

25 March 2019

The Director
Investigations 4
Anti-Dumping Commission
GPO Box 2013
CANBERRA ACT 2601

Email: leisa.baynham@adcommission.gov.au

Public File

Dear Ms Sir/Madam

Investigations No. 490 & 494 – Review of anti-dumping measures inquiry – aluminium extrusions exported from Malaysia by Alumac Industries Sdn Bhd

The exporter verification report for Alumac Industries Sdn Bhd (“Alumac”) of Malaysia (EPR Document No. 011) was recently placed on the public record in Investigations 490 (revocation of measures) and 494 (review of measures)..

Capral Limited (“Capral”) has reviewed the report and notes that the Anti-Dumping Commission (“the Commission”) has determined that exports of aluminium extrusions to Australia by Alumac had a dumping margin of negative 6.78 per cent.

The Commission also determined that Alumac was not the beneficiary of any subsidies from the Government of Malaysia during the investigation period.

In its submission dated 28 September 2018 Capral confirmed its support for the Commission’s decision not to consider the revocation of the measures. At the time of Alumac’s application, the measures had only been in place for a little over twelve months. A decision to consider revocation of the measures would be considered premature in the current circumstances.

Capral noted that the Commission excluded a model of goods referred to as “Sample-PC-6A-T1”. Capral concurs with the Commission’s decision to exclude this model from Alumac’s domestic sales comparisons with goods exported to Australia.

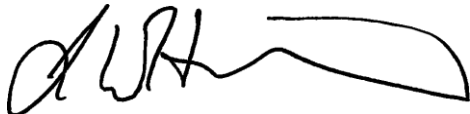
Capral notes that the Commission has afforded Alumac adjustments to normal value for cutting’ and ‘machining’ costs that it alleges are incurred on domestic sales. Capral queries whether the cutting and machining costs are limited only to domestic sales as these would also apply to export sales – and hence no adjustment is warranted.

Capral would also highlight that it is concerned about the broad categories defined by finish for model matching purposes. Capral is aware that some goods have different anodizing thicknesses and others have differing powder coating costs driven by colour and warranty requirements, than others and this can influence model matching outcomes.

Capral requests that the Commission re-examine the adjustments granted to Alumac for cutting and machining associated with domestic sales, and whether these adjustments are warranted.

If you have any questions concerning this submission, please do not hesitate to contact me. I can be contacted on (02) 8222 0113 or you may contact Capral's representative Mr John O'Connor on (07) 3342 1921.

Yours sincerely

A handwritten signature in black ink, appearing to read 'LHAWKINS', with a long horizontal flourish extending to the right.

Luke Hawkins
General Manager – Supply and Industrial Solutions