

27 May 2019

Case Manager
Investigations 4
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601

Email: investigations4@adcommission.gov.au

Public File

Dear Sir/Madam

Review of Measures Investigation No. 509 – Application by EverPress Aluminium Industries Sdn Bhd

I. Introduction

EverPress Aluminium Industries Sdn Bhd (EverPress”) has made an application for the Anti-Dumping Commission (“the Commission”) to determine individual variable factors for the Malaysian exporter from those previously determined for “uncooperative” exporters.

EverPress has demonstrated to the Commission that the variable factors that were determined in Investigation No. 362 have changed based upon a comparison of normal values and export prices in the original investigation period with those apparent in 2018.

Capral Limited (“Capral”) notes that EverPress claims that it is not in receipt of any subsidies from the Government of Malaysia.

II. EverPress Aluminium

EverPress is a Malaysian producer of aluminium extrusions that sells approximately xxx per cent of its goods on the domestic market, and exports the remaining xxx per cent primarily to Australia. EverPress operates on an annual turnover of approx.. \$xxx-xxx M, with xxx profit (i.e. less than xx per cent in 2017) (refer Confidential Attachment 1).

EverPress carries a relatively high debt level – with close to \$xxx M in borrowings.

EverPress has not previously been the subject of an exporter verification visit by the Commission. Capral requests the Commission to be satisfied that EverPress’ aluminium purchases include the following:

- The cost of primary aluminium (typically linked to LME price);
- A regional premium;
- Inland transport costs; and
- A billet premium reflecting the additional cost to convert an ingot into a billet for use in the manufacture of the goods.

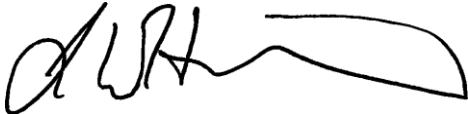
The aggregate of these costs should be reflected in EverPress' raw material aluminium cost.

The Commission should then validate EverPress' extrusion costs, including fixed overheads, allocation of overheads, and the exporter's selling and general administration expenses.

Consistent with other inquiries Capral draws to the Commission's attention that the exporter's costs should confirm that packaging costs for export are higher than domestic packaging costs, including for steel trolleys, wooden crates and inter-leave paper. In previous investigations, certain exporters have contended that there is no difference between domestic and export packaging costs. Recent investigations (including 362, 392 and 442) have confirmed the existence of these costs for export sales of the goods to Australia necessitating an upwards adjustment to EverPress' normal value.

If you have any questions concerning this submission, please do not hesitate to contact me on (02) 8222 0113 or 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