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Anti-Dumping Commission
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**Submission for Public File
SEF EverPress Aluminium Extrusions Review 509**

I represent EverPress

No separate confidential submission

On 3 June 2019 EverPress made similar pre-verification and pre-SEF submissions to which the ADC made no response

Following the SEF negative 10.1% dumping margin, rather than setting *ascertained normal value* floor price method IDD, for the following numbered reasons, now, in relation to EverPress, the Minister must either:

- **Revoke the current dumping duty notice because measures no longer warranted**—rather than the page 14 CON 509 ADC determination otherwise

1 No current dumping

ADC verified as **negative** plus negative **10.1%** at the extreme high end proving no dumping—*variable factors* have changed

2 Dumping unlikely in the future if revoked

- a** No current dumping forms the best evidence, the strongest grounds and more than a *reasonable* basis that EverPress will continue selling to Australia with this similar order of magnitude of high **negative** margin and, it naturally follows, without dumping and without injury to Australian industry

Even more so in the case of EverPress with such **high** negative dumping margin agreed by the ADC

- b** Given this high negative dumping margin, coupled with revoking the countervailing notice, when determining whether revocation would lead or likely lead to continuation of or recurrence of the material injury that the measures are intended to prevent, the ADC has yet give reasoned explanation as to how it excluded from its (continuation of or recurrence) injury analysis:

..... *the injurious effects of other* (that is, other than the EverPress shipments) *factors impacting upon the financial health of the Australian* (aluminium extrusion) *industry*

ADRP 104 , paragraph 104, restates this ADC burden, particularly as it applies to like aluminium extrusions shipped to Australia and over a contemporary IP as the 482 *Review* considered in ADRP 104

These other factors even more relevant for the ADC to explain in the case here of EverPress aluminium extrusion shipments with, among many other factors, its extremely high negative dumping margin

- c **ADC admits EverPress**
had reasonable grounds for asserting the injury to the Australian industry is not being caused by EverPress

(3.3.2 CON 509)

- d EverPress repeats the same reasons in item 3 of its 3 June 2019 confidential submission on the Consideration Report 509—redacted from the public version

- **Set *floor price* at zero or *de minimus***

- 3 Nothing in the legislation:

- prohibits this
- compels the Minister to set any particular *floor price* higher than zero, here in the case of EverPress with its such extremely high negative dumping margin

- 4 Most appropriate means to remedy *ascertained normal value* floor price



Geoff Cantelo