

Received 20 July 2020

17 July 2020

Mr Gavin Crooks  
Assistant Director  
Investigations 3  
Anti-Dumping Commission  
Level 35  
55 Collins Street  
Melbourne Victoria 3000

Email: [Gavin.Crooks@adcommission.gov.au](mailto:Gavin.Crooks@adcommission.gov.au)

**Public File**

Dear Mr Crooks

**Investigations No. 540 and 541 – Mill Finish and Surface Coated Aluminium Extrusions exported from Malaysia – Domestic prices versus export prices**

I. Background

Capral Limited (“Capral”) seeks to highlight with the Anti-Dumping Commission (“the Commission”) some recent examples of *prima facie* dumping concerning the supply of aluminium extrusions to Australia by select Malaysian exporters the subject of Investigations 540 and 541.

II. [Exporter] offers

Capral is aware that [exporter] provided an offer to supply [month] for aluminium extrusions as per the following:

- [Grade & temper]: xx metric tonnes, [details re size and freight] in mill finish or [surface finish].

An earlier offer (date) for [grade & temper, size and freight] was also obtained. Please refer to Confidential Attachment 1 for worksheet with [supplier] offers.

Capral has obtained market intelligence on domestic prices offered by [exporter] to align (adjusted for LME pricing at time) with the above offers. This information is included in worksheet “name” at Confidential Attachment 1.

A comparison with the proposed export supply offer with corresponding domestic pricing (adjusted for LME pricing at the time) is included in worksheet (Price comparison Dom v Export). Based upon the identified offers, Capral has contrasted the comparable domestic and export price offers of [exporter] and determined a xx per cent dumping margin for mill finish product, and an xx per cent margin for [surface finish] extrusion.

III. [Exporter]

In [month] [importing company] responded to an offer for supply of [goods – details] . Refer worksheet at Confidential Attachment 1 – “[supplier] Offer”).

Capral obtained domestic market offerings from [supplier] for similar goods offered for sale in Malaysia adjusted for contemporary LME pricing (refer worksheet “[supplier] offer”).

Capral has followed a [pricing] methodology from the [importer] to calculated a dumping margin for the two revised [importer] offers – mill finish (i.e. \$xxxx per kg) and [surface finish] extrusions (\$xxxx per kg).

Capral contrasted the mill finish and anodised domestic and export price offers and calculated dumping margins of xxper cent and xx per cent, respectively.

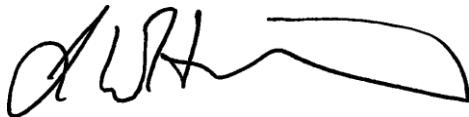
IV. Indicative dumping

Capral submits that preceding analysis confirms that the Malaysian exporters [supplier] and [supplier] have quoted to supply aluminium extrusions for export to Australia at dumped prices. Capral further contends that the injury experienced by Capral during 2019 (and by other members of the Australian industry) can be attributed to the preparedness of the Malaysian exporters not the subject of anti-dumping measures to export at dumped prices that undercut the Australian industry’s selling prices and priced below import prices for goods supplied from other countries.

Capral welcomes the opportunity to further discuss the price offers included at Confidential Attachment 1 from the two Malaysian exporters.

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



Luke Hawkins  
General Manager – Supply and Industrial Solutions