

11 May 2020

The Director
Investigations 3
Anti-Dumping Commission
GPO Box 1632
Melbourne Victoria 3001

Email: investigations3@adcommission.gov.au

PUBLIC FILE

Dear Sir/Madam

Investigation No. 543 – Continuation of measures on aluminium extrusions exported from The People's Republic of China – Kam Kiu (Australia) Pty Ltd

I refer to the recent exporter briefings provided to the Anti-Dumping Commission (“the Commission”) involving certain ‘selected’ exporters of aluminium extrusions to Australia for the purposes of continuation of measures Investigation No. 543 (“invest 543”).

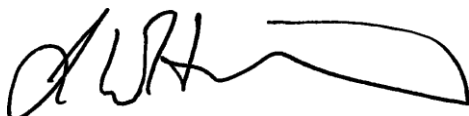
Capral Limited (“Capral”) has obtained a copy of Kam Kiu (Australia) Pty Ltd’s (“Kam Kiu Australia”) financial statements to 31 December 2019. As indicated in the exporter briefing specific to Kam Kiu Australia, the Australian importer has operated at a loss for the past four financial years. The attached financial statements for 2019 lodged with ASIC for 2019 (refer Confidential Attachment 1) confirm the loss for the year and also include an ongoing outstanding liability to Kam Kiu KHK (refer P. 13). It is understood that this outstanding amount relates to Kam Kiu Australia’s affiliate in Hong Kong.

It is also noted that Kam Kiu Australia has a significant amount outstanding to Kam Kiu Group – Malaysia of A\$2,347,779.

Capral queries whether the outstanding liability to the affiliated Hong Kong company Kam Kiu Group – KHK, relates to aluminium extrusions purchases for re-sale into Australia. The outstanding balance must therefore be included as a cost for the goods exported to Australia. Capral requests that the Commission to investigate these outstanding liabilities as they impact Kam Kiu Australia’s sales of aluminium extrusions exported to Australia from China (and Malaysia).

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