

2 April 2020

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

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**Public File**

Dear Sir/Madam

**Investigation No. 543 – Continuation of measures on aluminium extrusions exported from The People’s Republic of China – Extensions of time for Exporter Questionnaire Responses**

I refer to EPR Document 007 recently published in respect of Continuation of Measures Investigation No. 543.

Capral Limited (“Capral”) notes that the Anti-Dumping Commission (“the Commission”) has approved extensions of time for exporters to provide responses to exporter questionnaires. Extensions of time to submit an exporter questionnaire have been approved as follows:

Entity	Extension Requested	Extension Granted	Revised due date
Foshan City Sanshui Yongya Aluminium Co., Ltd	14 days	14 days	6 April 2020
Goomax Metal Co., Ltd Fujian	14 days	14 days	6 April 2020
Guangdong Jinxiacheng Al Manufacturing Co., Ltd	14 days	14 days	6 April 2020
Tai Shan City Kam Kiu Aluminium Extrusions Co., Ltd	21 days	21 days	13 April 2020
PanAsia Aluminium (China) Limited	49 days	49 days	11 May 2020

The Commission has up until recently adopted a practise of limiting extensions for the completion of exporter questionnaire responses to a relatively short timeframe (typically 7 days). It is acknowledged that the current circumstances do warrant concessions to entities where business practices have been impacted by the COVID 19 pandemic. Capral is, however, concerned by the significant timeframe extension afforded to PanAsia Aluminium (China) Limited (“PanAsia”) which more than doubles the usual 37-day timeframe for the completion of an exporter questionnaire response. PanAsia is familiar with the Australian Anti-Dumping System and legislated timeframes and its appears extraordinary that an extension has been granted that provides an exporter that is familiar with the process and timeframes requires almost three months to complete an exporter questionnaire response for the continuation investigation.

Capral urges the Commission to reconsider the length of the extension granted to PanAsia.

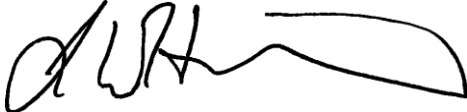
Whilst the timeframe extension afforded to the residual exporter Press Metal International Ltd (“Press Metal”) is not the lengthy 49 days, at 28 days this is also considered excessive given the exporter’s

familiarity with the Australian Anti-Dumping System (i.e. approximately ten years of participation in anti-dumping investigations in Australia).

Capral is concerned that the timeframe extensions granted to the identified exporters will contribute to overall timeframe extensions to the investigation. Capral is seeking an assurance from the Commission that the overall timeframe extension for the investigation will not be jeopardised.

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