

20th 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 – Submission by Tai Shan Kam Kiu Aluminium Extrusion Co., Ltd

I. Introduction

I refer to the submission by Tai Shan City Kam Kiu Aluminium Extrusions Co., Ltd “Kam Kiu Aluminium”) dated 23 March 2020 (EPR Document No. 10).

The submission on behalf of Kam Kiu Aluminium seeks clarification concerning certain categories of goods as to whether they fall within the scope of the goods the subject of the continuation of measures Investigation No. 543.

II. Particular goods

Kam Kiu Aluminium is seeking clarification as to whether the following goods are included within the goods description that are subject to the anti-dumping measures applicable to exports from China:

- auto parts products – goods that are included as parts of motor-vehicle bumpers, slide rails for car sunroof, auto structures, etc.
- certain products cut into very short/small pieces which it is claimed are used in “cell phone cases, which, like auto parts, are subject to much higher quality, technical standards”.

III. Goods subject to measures

The goods covered by the anti-dumping measures the subject of Investigation 543 are as follows:

Aluminium extrusions produced via an extrusion process, of alloys having metallic elements falling within the alloy designations published by The Aluminium Association commencing with 1, 2, 3, 5, 6 or 7 (or proprietary or other certifying body equivalents), with the finish being as extruded (mill), mechanical, anodized or painted or otherwise coated, whether or not worked, having a wall thickness or diameter greater than 0.5 mm., with a maximum weight per metre of 27 kilograms and a profile or cross-section which fits within a circle having a diameter of 421 mm.

The goods under consideration (“GUC”) include aluminium extrusion products that have been further processed or fabricated to a limited extent, after aluminium has been extruded through a die. For example, aluminium extrusion products that have been painted, anodised, or otherwise

coated, or worked (e.g. precision cut, machined, punched or drilled) fall within the scope of the goods.

The GUC do not extend to intermediate or finished products that are processed or fabricated to such an extent that they no longer possess the nature and physical characteristics of an aluminium extrusion, but have become a different product.¹

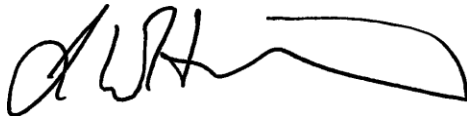
The Kam Kiu Aluminium submission seeks to distinguish its exports to Australia by the end-use application of those goods. However, the above goods description that applies to the exported goods is not based upon the end-use application of the exported goods. Further, the further work conducted on the aluminium extrusions is not a basis for asserting that the goods are not covered by the measures.

Where the goods manufactured and exported by Kam Kiu Aluminium fall within the description of the goods covered by the measures – without consideration of the end-use application – the goods are the subject of the anti-dumping measures and should be included within Kam Kiu Aluminium' exporter questionnaire response.

Where Kam Kiu Aluminium considers that goods as described for use in the automotive sector or for smaller, cut-to-shape extrusions are not covered by the measures, Kam Kiu Aluminium can seek an application for exemption from the anti-dumping measures.

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

¹ REP 148, p. 18 at 3.2