

7 May 2020

The Director  
Investigations 3  
Anti-Dumping Commission  
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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 – Comments re further submission by Classic Blinds and Shutters**

I refer to the further submission in Investigation 543 by Classic Blinds and Shutters ("CB&S") (EPR Document 012).

CB&S representations suggest that Capral Limited ("Capral") is not exposed to a future threat of material injury from exports of aluminium extrusions to Australia from China. Capral rejects this inference and considers that the findings of increased dumping margins for Chinese exporters the subject of the measures is supportive of Capral's concerns about the future threat of material injury. These concerns have been reflected in Capral's Financial Results announcement to the Australian Stock Exchange dated 29 April 2020 (see Non-Confidential Attachment 1).

It is noted that CB&S asserts that injury sustained by Capral can be "*attributed to many factors, most of them being internal and not sales related*". CB&S then refers the reader to Capral's 2018 P&L Statement. Investigation 543 concerning the continuation of measures has an investigation period of 1 January 2019 to 31 December 2019. Capral's announcements to the ASX on 29 April 2019 reflect this period.

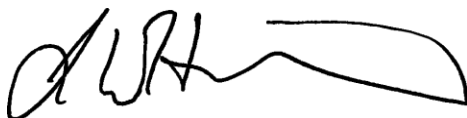
CB&S appears to be critical of Capral providing the customer with a credit note for "material delivered not to specification". CB&S then further criticises Capral for not approaching CB&S to provide revised pricing. Capral has sought to rectify the provision of out-of-specification product.

CB&S has made references to public interest provisions of other administrations.

Capral and the Anti-Dumping Commission ("the Commission") have been further criticised by CB&S in respect of dumping and subsidy margin calculations. The Commission will assess the dumping and subsidy margins in Investigation 543 on the available information.

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  
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