

12 June 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 Press Metal International**

I refer to the submission by Press Metal International (“PMI”) dated 4 May 2020.

The PMI submission has identified a number of matters that Capral Limited (“Capral”) seeks to provide comments on.

(i) *PMI as a ‘residual’ exporter*

The Anti-Dumping Commission (“the Commission”) confirmed in Australian Dumping Notice (“ADN No. 2020/017 that it was not practical to examine the exports of all exporters for the purposes of the continuation of measures investigation. The Commission nominated six exporters that it had selected for the purposes of verification. PMI was not one of the ‘selected’ exporters.

Capral does not consider that the Commission can fully consider PMI’s EQR and verify accordingly within the prescribed timeframes of the current investigation.

(ii) *T Bars*

PMI references “*bespoke and high specialised aluminium extrusions known as T-Bars*” which it is requesting to be “exempted” from the current investigation.

Investigation 543 is an inquiry into whether the Minister should allow the measures to expire. It is not an investigation into whether certain goods should be exempted from the coverage of the notices. PMI’s request for the exemption of certain goods from the coverage of measures, therefore, cannot be considered.

Notwithstanding, Capral refers the Commission to the Capral website “Catalogues/Brochures” and the “Extrusion Die Catalogue” dated October 2019. Listed on P. 34 & 35 are T-bars that can be manufactured by Capral in Australia. Capral is a manufacturer of T-Bars and would strenuously oppose an exemption from anti-dumping measures on T-Bars.

(iii) *Material injury*

The PMI submission contends that PMI “*does not consider it to be reasonably likely that any material [injury] has been caused or will continue to be caused by the export of its goods to Australia*”. PMI further

contends that due to the “specialised nature” of its exports that it is “extremely unlikely” that its exports would cause injury to the Australian industry.

Capral disputes the claims by PMI. The Commission has established in previous investigations involving PMI’s exports of like goods to Australia that the exported goods were at dumped prices. The exported goods were goods that fall within the goods description the subject of the notices. The Australian industry manufactures goods that are alike to the goods exported by PMI and, unless the goods are exported at non-dumped levels, the Australian industry has suffered, and will continue to suffer, injury from the exported goods.

PMI has suggested that the small volume of its exports would not be injurious to the Australian industry. It should be noted that the anti-dumping measures are intended to prevent material injury from occurring and that in the absence of measures it is likely that Chinese exporters – including PMI – will resume exports at dumped prices, resulting in a recurrence of injury that the measures are intended to prevent.

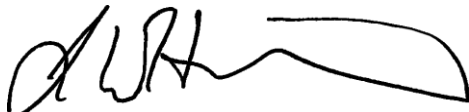
Irrespective of whether PMI is a “reputable, sophisticated and specialised manufacturer” of aluminium extrusions, these are not grounds to rely on that the exporter would not, in the absence of measures, export at dumped prices resulting in injury to the Australian industry.

*(iv) Conclusions*

Capral does not consider that PMI can be considered a “selected” exporter for the purposes of Investigation 543, given the advanced status of the investigation. Capral rejects PMI’s request for the exemption of T-Bar from the scope of the current investigation as the continuation investigation is not concerned with goods coverage. Finally, Capral does not consider that PMI’s claims that is minor export volumes of specialised manufactured goods are grounds to determine that PMI’s future exports in the absence of measures would not cause injury to the Australian industry.

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



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