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PUBLIC RECORD

10 July 2020

The Director, Investigations 4
Anti-Dumping Commission
GPO Box 2013
CANBERRA ACT 2601

By Email: investigations4@adcommission.gov.au

Dear Director,

**Press Metal International Ltd
Submission to Continuation Inquiry No 543 into aluminium extrusions exported from
the People's Republic of China
NON-CONFIDENTIAL**

We refer to our submissions dated 4 May 2020 and 26 June 2020 (**Submissions**). Please refer to the definitions included in our submission dated 4 May 2020 which are adopted in this letter.

We are instructed to make the following additional submissions in relation to this Inquiry.

1 **T-Bars**

1.1 Our Submissions have raised the issue of excluding the T-Bars from measures. In order to maintain confidentiality, details in relation to the specifications of the T-Bars have been redacted in our previous Submissions.

1.2 We are instructed, [REDACTED], [CONFIDENTIAL COMMUNICATIONS] to make further public disclosures in relation to the specifications of the T-Bars. The T-Bars are produced from a specific alloy, namely 5383 T, and are designed for use in the manufacture of marine vessels. The T-Bars are supplied by PMI to its main customer in Australia, [REDACTED] [PMI'S CUSTOMER].

1.3 [REDACTED] [PMI'S CUSTOMER] is a manufacturer of marine vessels and is one of Australia's leading exporter of completed marine vessels for commercial use. [REDACTED] [PMI'S CUSTOMER] has specific requirements for the components used to manufacture its vessels and relies on those requirements to produce efficient, competitive and high-quality products.

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1.4 The alloy used to produce the T-Bars is of particular importance to [REDACTED] [PMI'S CUSTOMER] production process. The 5383 alloy has mechanical properties which are required when they are used in the frame of the hulls of the vessels. [REDACTED] [PMI'S CUSTOMER], requires those mechanical properties to be present for the manufacture of its vessels as they allow for the use of aluminium in the hulls of its vessels. The mechanical properties of 5383 alloy are particularly relevant when the T-Bars are welded to the external shell plates of the hull between the hull frame of the vessel. Use of aluminium decreases the weight of the vessels and so allows for more efficient operation once the vessels are completed.

1.5 Further information in relation to the T-Bars and [REDACTED] [PMI'S CUSTOMER] requirements have been provided in our previous Submissions.

2 Application of measures to goods not produced by the Australian industry

2.1 As the ADC is aware, the purpose of dumping and countervailing measures is to protect the Australian industry from material injury caused by allegedly dumped imports.

2.2 As discussed above, we are instructed that [REDACTED]
[REDACTED]
[REDACTED] [CONFIDENTIAL COMMUNICATIONS]

2.3 Dumping and countervailing measures are only appropriate in circumstances where it can be shown that goods are being dumped and that that alleged dumping is causing material injury to the Australian industry. In circumstances where the Australian industry does not manufacture T-Bars in 5383 T alloy the ADC cannot find that PMI's exports of those goods have caused any material injury.

2.4 Imposing dumping and countervailing duty on the T-Bars would lead to measures being imposed on goods which are not appropriately contemplated as GUC, are not produced by the Australian and could not be causing the alleged material injury to the Australian industry.

Accordingly, we request that the ADC confirms that the T-Bars will be excluded from measures.

We would be pleased to provide the ADC with any further information it may require.

If you have any queries, please do not hesitate to contact our office.

Yours faithfully



Andrew Hudson
Partner