

26 March 2020

The Director
Investigations 3
Anti-Dumping Commission
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Public File

Dear Sir/Madam

Investigations 544 – Review of Anti-Dumping Measures on aluminium extrusions exported to Australia from Malaysia and the Socialist Republic of Vietnam

I. Introduction

I refer to Anti-Dumping Notice No. 2020/014 (“ADN 2020/14”) notifying the commencement of an investigation into the review of anti-dumping and countervailing measures applicable to exports of aluminium extrusions to Australia from Malaysia and anti-dumping measures applicable to exports from the Socialist Republic of Vietnam (“Vietnam”).

The review will examine whether the variable factors (normal value, export price, amount of countervailable subsidy received and non-injurious price) relevant to the taking of the anti-dumping measures as they affect certain exporter in Malaysia and all exporters in Vietnam, have changed.

The review of measures investigation follows a request by the Minister for Industry, Science and Technology to review the dumping and/or countervailing measures as they affect exporters of aluminium extrusions exported to Australia from Malaysia and Vietnam.

II. Change in raw material aluminium price

As you know, Capral Limited (“Capral”) is a manufacturer of aluminium extrusions and a member of the Australian industry that has previously requested the imposition of anti-dumping and/or countervailing measures.

In Investigation 362 the investigation period for the examination of dumping and subsidisation for exports to Australia from Malaysia and Vietnam was 1 July 2015 to 30 June 2016. Since the original investigation period in Investigation 362, there has been significant movements in the London Metals Exchange (“LME”) price for primary aluminium and the Major Japanese Port Premium (“MJP”) which are associated with the purchase price for raw material aluminium ingots used by aluminium extrusions manufacturers.

The following Table 1 highlights the changes in the LME and MJP from the original investigation period to calendar year 2019 (the investigation period in Review of Measures Investigation 544).

Table 1 – Changes in LME and MJP 2015/16 to 2019

Period	LME + MJP A\$ per MT	% Change
1 July 2015 to 30 June 2016	\$xxxx	
1 January 2019 to 31 December 2019	\$xxxx	
Difference	\$xxxx	xx% ↑

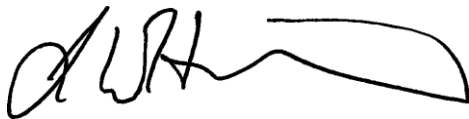
Please refer to a graphic depiction of the above change in the two identified investigation periods in the attached Confidential Attachment 1.

The xx per cent increase in the LME and MJP translates to a material change in production costs and selling prices. The variable factors determined in Investigation No. 362 are ineffective in addressing injurious dumping as the contemporary costs associated with raw material inputs consumed in the manufacture of aluminium extrusions have increased by xx per cent.

Capral anticipates that the Anti-Dumping Commission’s (“the Commission”) review of variable factors applicable to exports from Malaysia and Vietnam will align the variable factors with contemporary values and the variable factors that were recently reviewed in respect of aluminium extrusions exported from the People’s Republic of China (“China”).

If you have any questions concerning this submission, please do not hesitate to contact me on (02) 8222 0113.

Yours sincerely



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