



QINGYUANHUANAN COPPER AND ALUMINUM CO LTD
High Quality Alumin • YinrenHuananum

10 June 2021

The Director - Investigations 1
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601

**Accelerated review into aluminium extrusions exported by
Qingyuan City Huanan Copper and Aluminium Co., Ltd from China**

Dear Director,

This submission is made on behalf of the Qingyuan City Huanan Copper and Aluminium Co., Ltd (QCHCA) in response to the submission by Capral Limited (Capral), dated 31 May 2021. Capral makes a number of points in response to QCHCA's application for accelerated review of aluminium extrusions.

Exports to Australia

Capral queries whether QCHCA has made exports of aluminium extrusions to Australia, which would prevent it from being a new exporter. However, as the Commission is aware, the definition of a new exporter is one that did not export the subject goods during the original investigation period and as such, was not investigated at that time. QCHCA reiterates and confirms that it has **not** exported the goods subject to the notice to Australia during the original investigation period.

Likewise, it is confirmed that no associated entities exported the subject goods during the original investigation period.

Normal value

Capral notes that the Commission has in past accelerated reviews where no exports occurred during the review period, determined export prices at the level of the ascertained normal values. QCHCA agrees with Capral that this approach ensures that future exports are exported at prices no less than the established normal values, and in so doing, prevents injury to the local industry.

Form of measure

Capral supports the continued use of the combination duty method. Whilst the combination method may be applicable more broadly for exports of aluminium extrusions, QCHCA notes that the Commission has commonly utilised the floor price measure which allows for a variable component of duty to be collected to ensure that export prices do not fall below the ascertained normal value.