



Australian Government
Department of Industry, Science,
Energy and Resources

Anti-Dumping
Commission

Supplementary Australian Industry Questionnaire

Product: Aluminium Extrusions

From: Malaysian and The Socialist Republic of Vietnam (Vietnam)

Inquiry Period: 1 July 2020 to 30 June 2021

Response due by: 22 October 2021

Important note: The timeliness of your response is important. Please refer below for more information.

Case manager: Ben Merlin

Phone: 03 8539 2408

Fax: 03 8539 2499

E-mail: investigations1@adcommission.gov.au

Anti-Dumping Commission website: www.adcommission.gov.au

**Return completed
questionnaire to:** investigations1@adcommission.gov.au

OR

Anti-Dumping Commission
GPO 2013
Canberra ACT 2601
Australia

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DECLARATION

I believe that the information contained in this response is complete and correct.

Signature 

Name: Andrew Cockroft

Position: Business Support Manager

Company: G.James Extrusion Company P/L

ABN: 95 010 828 234

Date: 15/11/2021

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A-1 Identity and communication.

Please nominate a person in your company for contact about the response:

Contact Name:	Stephen Keune
Company and position:	G.James Australia Pty Ltd – Company Secretary
Address:	1084 Kingsford Smith Drive, Eagle Farm QLD 4009
Telephone:	(07) 3877 2333
Facsimile:	(07) 3877 2893
E-mail address:	stephen_keune@gjames.com.au
ABN:	47 010 823 542

Alternative contact

Name:	Andrew Cockroft
Position in company:	Business Support Manager
Address:	990 Kingsford Smith Drive, Eagle Farm QLD 4009
Telephone:	0412 416 373
Facsimile:	(07) 3877 2890
E-mail address:	drew_cockroft@gjames.com.au

If you have appointed a representative to assist with your response, provide the following details and complete Appendix A8 (Representation).

Name:	
Business name:	
Address:	
Telephone:	
Facsimile:	
E-mail address:	
ABN:	

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A-2 Company information.

1. State the legal name of your business and its type (e.g. company, partnership, sole trader, joint venture). Please provide details of any other business names you use to manufacture/produce/sell the goods that are the subject of the inquiry.
 - *G James Extrusion Company Pty Ltd is the legal name of the business which is a company*

2. Identify and provide details of any relationship you have with an exporter to Australia or Australian importer of the goods.
 - *KAM KIU Aluminium Products SND BHD – Supplier of extrusions outside our production capabilities. Represents <1% of total volume.*

3. Provide a copy of all annual reports applicable to the data supplied in appendix A3 (Sales Turnover). Any relevant brochures or pamphlets on your business activities should also be supplied.



4. Provide details of any relevant industry association.
 - *Refer to attachment A2_4 for details of any relevant industry association*

A-3 The imported and locally produced goods.

1. Fully describe your product(s) that are 'like' to the imported product:
 - Include physical, technical or other properties.
 - List this information for each make and model in the range.
 - Supply technical documentation where appropriate.
 - Indicate which of your product types or models are comparable to each of the imported product types or models. If appropriate, the comparison can be done in a table.
 - *Refer to attachment A3_1 (a) for Aluminium Press Capabilities.*

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- Refer to attachment A3_1 (b) for relevant industry association. This represents G. James ISO9001 quality management system certification. This outlines the following scope: The extrusion of both structural and architectural aluminium profiles for the domestic and commercial market including surface finishing such as polishing, bright dip, anodising, powder coating, polyester and fluorocarbon coating; casting of secondary aluminium logs and foundry ingots.
 - G James is capable of extruding profiles ranging from 0.15 – 20.00 kg/m in sizes up to 400mm widths in architectural to structural grade 6000s series aluminium alloys including but not limited to 6060, 6063, 6106, 6005a, 6351 & 6082. Structural grade alloys in 6082 can be certified under DNV rules for use in ship building.
2. If your product is manufactured from both Australian and imported inputs:
- describe the use of the imported inputs; and
 - identify that at least one substantial process of manufacture occurs in Australia (for example by reference to the value added, complexity of process, or investment in capital).
- Aluminium Billet, our major raw material component, is sourced both domestically from Rio Tinto, Gladstone QLD and imported from Hydro Aluminium, Qatar. [REDACTED]

A-4 The Australian market.

1. Describe the end uses of both your product and the imported goods.

Industry	Customer Channel	Product Group
Transport	Light Road Transport	Aluminium Extrusion
Construction - Commercial	Heavy Road Transport	Painting
Construction - Residential	Rail Transport	Anodising
Construction - Housing	Marine Transport	Security mesh
Manufacturing	Air Transport	Furniture
Mining & Energy	Furniture	Commercial
Agriculture	Hospitality	Windows
Government	Industrial	Doors
Education	Civil	Crimsafe
Distributors	Architectural	Wardrobes/Mirrors
Renewable Energy	Machinery / Plant / Equipment	Security screens
General / Other	Operations	Fly Screens
	Public Utilities	Shower screens
	Federal Government	Park Equipment
	State Government	Glass - Cut to Size

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<i>Local Government</i> <i>Tertiary Education</i> <i>Secondary Education</i> <i>Primary Education</i> <i>Distributors / Resellers / Systems</i> <i>Glaziers - Replacements</i> <i>Glaziers - Shopfronts</i> <i>Glaziers - Facades</i> <i>Glaziers - Windows and Doors</i> <i>Shower Screen Manufacturer / Installer</i> <i>Splash Back Manufacturer / Installer</i> <i>Balustrades/Pool Fencing</i> <i>Fabricators - Aluminium Windows</i> <i>Fabricators - PVC Windows</i> <i>Fabricators - Timber Windows</i> <i>Architect</i> <i>Builder - Multi Residential</i> <i>Builder - Single Dwelling</i> <i>Builder - Renovation / Maintenance</i> <i>Interior Designer</i> <i>Owner/Builder</i> <i>Internal Fit outs</i> <i>Shopfronts</i> <i>Internal Partitioning</i> <i>Glass Merchants</i> <i>Graphics</i> <i>Windscreen Manufacturer / Installer</i> <i>Signage Manufacturer / Installer</i> <i>Other</i>	<i>Glass - Cases and blocks</i> <i>Diptech</i> <i>Toughened glass</i> <i>Laminated Glass - Cut to Size</i> <i>Laminated Glass - Cases and blocks</i> <i>Glass Processing</i> <i>Insulated Glass Units</i> <i>Automotive Glass</i> <i>Painted Glass</i> <i>Cladding</i> <i>Scaffolding</i> <i>Balustrades</i> <i>Staircases/Escalators</i> <i>Pool fencing</i> <i>Shelters</i> <i>Solar</i>
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2. Generally describe the Australian market for the Australian and imported product and the conditions of competition within the overall market. Your description could include information about:
- sources of product demand;
 - marketing and distribution arrangements;
 - typical customers/users/consumers of the product;
 - the presence of market segmentation, such as geographic or product segmentation;
 - causes of demand variability, such as seasonal fluctuations, factors contributing to overall market growth or decline, government regulation, and developments in technology affecting either demand or production;
 - the way in which the imported and Australian product compete; and
 - any other factors influencing the market.

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- *G.James identify segments both by market type and geography.*
 - *G.James sales employees are allocated to geographical territories, but sales plans and customers are targeted by market segments.*
 - *There is seasonality to the overall business, as there are seasonality nuances to different segments as well. Factors that can determine this are political environment, end of financial year, Christmas / New Year shut-downs, weather (e.g. wet season, summer versus Winter etc.) and clusters of public holidays.*
3. Identify if there are any commercially significant market substitutes for the Australian and imported product.
- *As a commodity, aluminium will always face competition from such substitutes as differing steel (mild steel, stainless etc.), composite material, plastic / PVC and pre-fabricated products*
4. Complete appendix A1 (Australian production).

[REDACTED]

A-5 Company sales.

1. Complete appendix A3 (sales turnover).

[REDACTED]

[REDACTED]

2. Complete appendix A4 (domestic sales).

- If any of the customers listed at appendix A4 (domestic sales) are associated with your business, provide details of the association. Describe the price effect of the association.

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3. Complete appendix A5 (sales of other production) if you have made any:
- internal transfers; or
 - domestic sales of like goods that you have not produced, for example if you have imported the product or on-sold purchases from another Australian manufacturer.

[REDACTED]

[REDACTED]

3. Attach a copy of distributor or agency agreements/contracts.

[REDACTED]

4. Provide copies of any price lists.

[REDACTED]

5. If any price reductions (for example commissions, discounts, rebates, allowances and credit notes) have been made on your Australian sales of like goods provide a description and explain the terms and conditions that must be met by the customer to qualify.
- Where the reduction is not identified on the sales invoice, explain how you calculated the amounts shown in appendix A4 (domestic sales).
 - If you have issued credit notes (directly or indirectly) provide details if the credited amount has **not** been reported appendix A4 (domestic sales) as a

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discount or rebate.

[REDACTED]

9. Select two domestic sales in each quarter of the data supplied in appendix A4 (domestic sales). Provide a complete set of commercial documentation for these sales. Include, for example, purchase order, order acceptance, commercial invoice, discounts or rebates applicable, credit/debit notes, long or short term contract of sale, inland freight contract, and bank documentation showing proof of payment.

[REDACTED]

A-6 General accounting/administration information.

1. Specify your accounting period.
 - *Financial Year – 1 July and ends the next year on 30 June*
2. Provide details of the address(es) where your financial records are held.
 - *G. James Australia Pty Ltd, 1084 Kingsford Smith Drive, Eagle Farm QLD 4009*
3. Please provide the following financial documents for the two most recently completed financial years plus any subsequent statements:
 - chart of accounts;
 - audited consolidated and unconsolidated financial statements (including all footnotes and the auditor's opinion);
 - internal financial statements, income statements (profit and loss reports), or management accounts, that are prepared and maintained in the normal course of business for the goods.

These documents should relate to:

 1. the division or section/s of your business responsible for the production and sale of the goods covered by the inquiry, and
 2. the company overall.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4. If your accounts are **not** audited, provide the unaudited financial statements for the two most recently completed financial years, together with your taxation returns. Any subsequent monthly, quarterly or half yearly statements should also be provided.
 - *Non-Applicable*
5. If your accounting practices, or aspects of your practices, differ from Australian generally accepted accounting principles, provide details.
 - *Non-Applicable*
6. If the accounting methods used by your company have changed over the period covered by the inquiry please provide an explanation of the changes, the date of change, and the reasons.
 - *Non-Applicable*

A-10 Injury Claims

1. Please provide a statement setting out whether you support or oppose the continuation of the anti-dumping measures and your reasons for doing so. If you support a continuation of the anti-dumping measures, provide evidence addressing whether dumped or subsidised imports have caused, are causing and/or will cause material injury to the local industry producing like goods if the measures were to expire.

Your response should consider:

1. Information on market trends for the goods in question for the last three years, addressing in particular, in the absence of the measures, the:
 - i. Effects on volume and value of imports and sources of imports
 - ii. Effects on price
 - iii. Effects on sales and market shares
 - iv. Effects on key performance indicators such as:
 - a. profits,
 - b. price trends,
 - c. investment, and;
 - d. employment.
2. Information addressing the likelihood of material injury occurring to the Australian industry in the absence of the anti-dumping measures. Alternative

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sources of export supply that may arise following the potential imposition of dumping duty, or production capacity in the country concerned, may be relevant.

3. Discuss factors other than dumped imports that may have caused injury to the industry. This may be relevant to the inquiry, in that an industry weakened by other events may be more susceptible to injury from dumping.

Responses should be made as accurately and as comprehensively as possible. Supporting evidence should be attached wherever possible. It will not be sufficient to simply assert that the measure should remain in force.

- *Pre-fabricated imports hurt the domestic markets. It is difficult for our customer to compete with input and labour costs of many Asian, including Malaysian and Vietnam businesses, therefore they either face a downturn of work themselves, or import themselves. This in-turn hurts domestic aluminium extrusion supply.*
- *There is spare capacity in the market that extruders are trying to fill. This also leads to price discounting in an attempt to fill this volume. This has been compounded by further domestic extrusion capacity being made available (based on FY21 activity).*

APPENDICES

Appendix A1	Australian Production
Appendix A3	Sales Turnover
Appendix A4	Domestic Sales
Appendix A5	Sales of Other Production
Appendix A8	Authority to Deal With Representative