

2 December 2021

Mr Ben Merlin
Assistant Director
Investigations 1
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601

Dear Mr Merlin

Public File

Investigation No. 591 – Aluminium extrusions exported from Malaysia and Vietnam – continuation of measures inquiry

I. Background

Capral Limited (“Capral”) is the applicant company that has requested the continuation of anti-dumping measures to exporters in Malaysia and Vietnam following Investigation No. 362.

Capral’s application included confirmation of support from other Australian industry manufacturers that are impacted by exports of dumped aluminium extrusions from Malaysia and Vietnam.

Capral notes the representations made on behalf of Press Metal Aluminium Australia Pty Ltd (“PMAA”) that contests¹ that other members of the Australian industry have not suffered material injury in the most recent periods according to their respective audited financial statements.

Capral would like to draw to the attention of the Anti-Dumping Commission (“the Commission”) the recent financial performance of other industry members that is relevant to the Commissioner’s assessment as to whether material injury is “likely” to the Australian industry should the measures be allowed to expire.

II. Financial results

Capral has obtained Australian Investment and Securities Commission (“ASIC”) statements for the following Australian manufacturers in support of the continuation of measures application to demonstrate the tenuous nature of the financial position of the industry members.

(a) *Aluminium Profiles (Australia) Pty Ltd*

Aluminium Profiles (Australia) Pty Ltd held relatively stable revenues in 2018 and 2019, although returns in both years were xxx and xxx per cent (respectively). Refer Confidential Attachment 1.

(b) *Extrusions Australia Pty Ltd*

Extrusions Australia Pty Ltd [*description of profit*] in the consecutive 2018 and 2019 years. Refer Confidential Attachment 2.

¹ Investigation No. 591, EPR Document No 008, P.5.

(c) *G James Extrusion Co Pty Ltd*

In the financial period covered by the investigation period in Investigation No. 591, G James Extrusion Co Pty Ltd returned [commercially sensitive comments concerning profits and revenues]. Refer Confidential Attachment 3.

(d) *Almax Aluminium Pty Ltd*

Almax Aluminium Pty Ltd achieved a [commercially sensitive details concerning sales] in income in 2021, and returned an xxxx per cent return –[commercially sensitive details concerning performance] per cent return in 2020. Refer Confidential Attachment 4.

(e) *Ullrich Aluminium Pty Ltd*

Ullrich Aluminium Pty Ltd returned a xxxx per cent return on revenues of \$xxxx M in 2021 –[commercially sensitive details concerning performance] per cent return achieved in 2020. Refer Confidential Attachment 5.

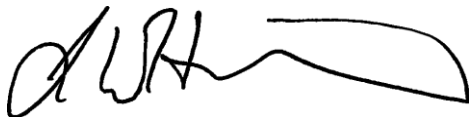
III. Material injury

The available financial results for the above five Australian aluminium extrusions manufacturers demonstrate that in the main, returns have been less than adequate in 2020 and 2021 to warrant ongoing reinvestment in aluminium extrusion manufacturing.

Malaysia and Vietnam are countries that have been exporting aluminium extrusions to Australia at prices that can only be described as at the low-end of all import sources. Given the low level of profit in the Australian aluminium extrusions industry it can be concluded that should the measures on Malaysia and Vietnam be allowed to expire, it is *likely* that the Australian industry would experience a recurrence of the material injury that the measures are intended to prevent.

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



Luke Hawkins
General Manager – Supply and Industrial Solutions