

7 April 2022

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 – Response to Statement of Essential Facts

Ullrich Aluminium Pty Ltd (Ullrich Aluminium) is a local manufacturer of aluminium extrusions and is impacted by imports from Malaysia and Vietnam. Statement of Essential Facts No. 591 (SEF) is proposing to recommend that the Minister not continue measures against exports of aluminium extrusions from Malaysia and Vietnam when the measures are due to expire on 27 June 2022.

Ullrich Aluminium urges the Commissioner to reconsider this proposed recommendation. It has been Ullrich Aluminium's recent experience that importers of the goods from Malaysia and Vietnam have been active in undercutting Ullrich Aluminium prices, preventing Ullrich Aluminium from supplying customers with locally produced goods.

Ullrich Aluminium provides the attached examples in support of the impact of the imports from Malaysia and Vietnam on its business:

- (i) [Source country for imports] – Ullrich Aluminium has been unsuccessful in a tender with a competitor supplying [*supply source and value of supply \$/month*] (Refer Confidential Attachment 1);
- (ii) [*Company name*] – Ullrich Aluminium is encountering fierce competition from [*company name*] sourcing aluminium extrusions from [*Exporter*] with price undercutting of up to xx per cent and gross margin down to as low as xx per cent. Ullrich Aluminium cannot compete against these low prices at the identified customers (Refer Confidential Attachment 2).

The identified examples demonstrate that the anti-dumping measures on aluminium extrusions exported from Malaysia and Vietnam should be extended on 27 June 2022 and not be allowed to expire.

If you have any questions, please do not hesitate to contact me on 0412 009 581.

Yours sincerely

Simon Williams
Manufacturing Manager