

30 September 2022

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

Dear Sir/Madam

**Public File**

**Investigation No. 609 – Aluminium extrusions exported from The People’s Republic of China – Review of variable factors**

**I. Exporter Questionnaire Responses**

Capral Limited (“Capral”) refers to the update of 29 September 2022 concerning the status (refer EPR Document 005) with identified selected exporter questionnaire responses in Review of Variable Factors Investigation No. 609 (“Invest 609”).

The Anti-Dumping Commission (“the Commission”) file note (EPR Document No. 005) confirmed that it had not received by the due date (i.e. 14 September 2022) completed exporter questionnaire responses (“EQRs”) for the following selected Chinese exporters:

- Goomax Metal Co., Ltd Fujian (“Goomax”);
- Guangdong Jinxi Cheng Al Manufacturing Co., Ltd (“Jinxi Cheng”);
- Qingyuan City Huanan Copper & Aluminium Co., Ltd (“Huanan”);
- Foshan Lvqiang Metal Product Co., Ltd (“Lvqiang”).

Jinxi Cheng and Goomax were afforded extensions of time to complete EQRs. Jinxi Cheng provided a response within the extended timeframe. Goomax received a timeframe extension to 30 September 2022.

**II. Extension of selected exporters**

We note that the Commission has extended its acceptance of EQR responses to the following two exporters:

- Tai Shan City Kam Kui Aluminium Extrusion Co., Ltd (“Kam Kui”); and
- Guangdong Xingfa Aluminium Co., Ltd (“Xingfa”).

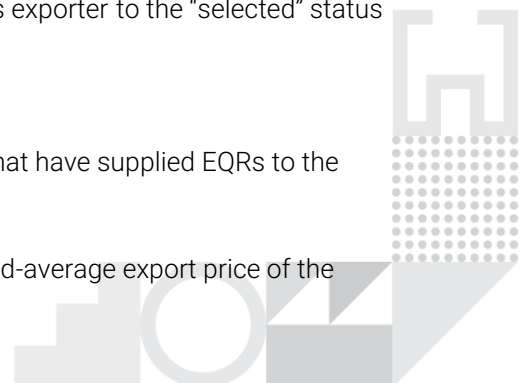
The File Note confirms that Xingfa has provided an unsolicited EQR by the original deadline for exporters of 14 September 2022. Kam Kui has been afforded an extended deadline for its EQR by 7 November 2022.

The Commission has accepted Xingfa’s EQR and appears to have elevated this exporter to the “selected” status for the purpose of the current review of variable factors investigation.

**III. Residual exporters**

EPR Document 005 additionally confirms the identified 25 residual exporters that have supplied EQRs to the Commission by the due date of 14 September 2022.

The residual exporters will be afforded an export price based upon the weighted-average export price of the



selected cooperative exporters and normal value based upon the weighted average normal value of the selected cooperative exporters. At this point in time the selected exporters have been re-assessed to include:

- Jinxi Cheng;
- Goomax;
- Kam Kui; and
- Xingfa.

The residual exporters' export price and normal values will be assessed on the information supplied by the above selected exporters.

Jinxi Cheng, Goomax and Kam Kui each have specific normal values and export prices with individual IDD and ICDs applicable. Xingfa is currently subject to the residual exporters' rate of IDD and ICD.

#### IV. Xingfa EQR

Capral has reviewed the Xingfa EQR and notes at Section A-2.8 that Xingfa states:

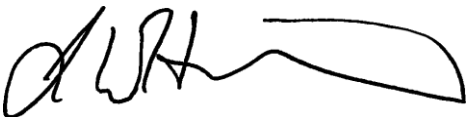
*"When exporting the GUC to Australia, it also only makes direct sales without using any trading company."*

The Xingfa response may be in relation to exporting agents in China for goods manufactured by its and sold to Australia. Capral, however, understands that the Xingfa Group of companies has appointed AUS STAR INTERNATIONAL HOLDINGS PTY LTD as its exclusive agent for goods exported to Australia from China (See attached Market Announcement. It is Capral's understanding that Star Alum is a major importer of aluminium extrusions from China (and other countries) including on behalf of Xingfa.

We further note that Xingfa's response at Section E-4 states that it does not provide commissions in respect of "domestic and export sales". Capral raises with the Commission its concern of an ongoing relationship with Star Alum that would likely include the payment of commissions on an ongoing basis.

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  
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