



Australian Government  
Department of Industry,  
Innovation and Science

Anti-Dumping  
Commission

## FILE NOTE

EXEMPTION INQUIRY EX0068

ALUMINIUM EXTRUSIONS

### MEETING WITH CAPRAL ALUMINIUM

30 November 2018, 10.00 am

PRESENT:

Capral	Luke Hawkins - GM Supply and Industrial Solutions John O'Connor – Consultant Richard Axe – Plant Manager Peter Darvell – Sales & Distribution	
Anti-Dumping Commission	Jukka Mäntynen	Case Manager
	Lily Kong	Case Officer

The visit to Capral Aluminium Ltd (Capral) was conducted to discuss and seek information pertaining to Exemption Inquiry EX0068.

The meeting was held at Capral's premises at 151 Barry Road Campbellfield, Victoria.

The following is a summary of matters discussed:

#### Overview

- Jukka provided an overview of the inquiry, including inquiry timeframes, preparation of a public file note following this visit, and maintaining confidentiality with information and data.
- Jukka indicated that the application can only be considered with reference to the relevant legislation.
- Capral hosted a tour of its production, finishing and warehousing facilities.

#### Clarification of the exemption goods

- Jukka indicated that the inquiry is in respect of the goods as described in the relevant notice, being certain aluminium extrusions and not in respect of a product *range* that includes several aluminium extrusions that together form a *system*.
- The goods are part of a proprietary precast formwork production. The applicant markets its sideform system to customers as a complete concrete casting product. The exemption goods (certain aluminium extrusions) are used for the sideforms.

### **The Exemption Goods and Like Goods**

- Jukka clarified the definition of the exemption goods and sought Capral's understanding of the properties of the exemption goods.
- Jukka clarified with Capral the range of aluminium extrusions that Capral is capable of manufacturing. Capral indicated that it could produce these types of products up to a height of 400 mm and that it could do so with respect to other specifications required by the applicant, Concrete Formwork Technologies Pty Ltd (CFT).
- Capral discussed the relevant history of its capabilities to make the exemption goods and described when it was necessary to procure inputs or materials through external providers to satisfy certain specifications of the goods as required by the applicant.
- Concerning the certain specifications of the exemption goods required by CFT, Capral explained during the visit that it has previously provided quotations to CFT for aluminium with properties not identical to that the subject of the exemption application but with which it believes would be suitable for CFT's purposes. The reason for Capral's proposal to depart from the certain specifications as requested by CFT being that these specifications rendered the manufacturing process more difficult.

### **Information Provided**

- Capral provided evidence in relation to price quotations, volume requirements and tooling costs.
- Capral provided details of costing and quotations related to tooling quotations provided to CFT and to other customers.
- Information requested by the Commission at the visit was subsequently provided by Capral and included an email to CFT that indicated that its quotations were provided in respect of the specifications required.
- Capral provided evidence (internal emails, brochures, costing sheets) in relation to tooling, tooling costs and explained methods of recovering tooling costs. A tooling sheet was also provided which listed the client types into categories and detailed the payment options available.
- Capral confirmed the quotes as per CFT's application are accurate reflections of the quotes provided.
- Capral explained where it purchases extrusion dies from.
- Capral provided a copy of a die cost sheet and stated certain dies may be relatively costly due to size or complexity.
- Capral indicated that it believes its tooling prices are similar to those of other Australian extruders.
- Capral provided a copy of a technical drawing of a die that indicated the specifications of a certain aluminium extrusion and the name of the customer for which it had been previously supplied. Capral also provided a sales report and copies of invoices of sales of this particular product. The technical drawing, the sales report and the invoices confirmed that Capral has previously supplied aluminium extrusions that meet the specifications that Concrete Formwork Technologies has stated that it requires and that are the subject of this exemption inquiry.

## **PUBLIC RECORD**

- Capral indicated that it also provides customers a distribution service, where it will hold inventory so that customers can buy *ex-stock* at a fee. Capral believes this service is well known within industry.
- Capral indicated that it has the capability to manufacture the exemption goods as required by CFT. In instances where certain specifications are required, Capral will outsource that part of the process depending on what is specified, the volumes required and other matters related to production at the time.
- Capral indicated that it does not know the reasons why CFT has requested certain specifications related to the exemption goods.