

The Commissioner of the Anti-Dumping Commission

By email: clientsupport@adcommission.gov.au

Application seeking an exemption from anti-dumping measures

Studform Pty Ltd would like to seek an exemption from anti-dumping measures that apply to certain aluminium extrusions exported to Australia from China, Malaysia and Vietnam. Our details are as follows:

Studform Pty Ltd
4 Manton Street
Hindmarsh SA 5007

Contact:

info@studform.com.au

The Exemption Goods

The goods for which we are seeking an exemption are ceiling section tees and wall angles with a nominal wall thickness of 1.2mm as listed below.

- 37 x 24mm Bulbed T Section with nominal thickness less than 1.2mm of either 6063 T6 or 6106 T6 alloy
- 37 x 15mm Bulbed T Section with nominal thickness less than 1.2mm of either 6063 T6 or 6106 T6 alloy
- 21 x 24mm T Section with nominal thickness less than 1.2mm of either 6063 T6 or 6106 T6 alloy
- 24 x 21mm T Section with nominal thickness less than 1.2mm of either 6063 T6 or 6106 T6 alloy
- 19 x 19mm Wall angle with ribs and nominal thickness parameters of 1.2mm in 6063 T5 alloy
- 19 x 10mm x 10mm x 19mm W Wall angle with ribs and nominal thickness parameters of 1.2mm in 6063 T5 alloy
- 32 x 10mm x 10mm x 25mm W Wall angle with nominal thickness parameters of 1.2mm in 6063 T5 alloy
- 32 x 34mm Wall angle with nominal thickness parameters of 1.2mm in 6063 T5 alloy
- 32 x 10mm x 10mm x 34mm Wall angle with nominal thickness parameters of 1.2mm in 6063 T5 alloy
- 32 x 34mm Two part Wall angle with nominal thickness parameters of 1.2mm in 6063 T5 alloy
- 32 x 10mm x 10mm x 34mm Two part Wall angle with nominal thickness parameters of 1.2mm in 6063 T5 alloy

All finished in either powder coated, mill finish, or natural anodized

The exemption goods are generally classified to the following tariff classifications and

statistical codes:

Tariff Subheading	Statistical Code	Description
7604.10.00	06	non alloyed aluminium bars, rods and profiles
7604.21.00	07	aluminium alloy hollow angles and other shapes
7604.21.00	08	aluminium alloy hollow profiles
7604.29.00	09	aluminium alloy non hollow angles and other shapes
7604.29.00	10	aluminium alloy non hollow profiles
7608.10.00	09	non alloyed aluminium tubes and pipes
7608.20.00	10	aluminium alloy tubes and pipes
7610.10.00	12	doors, windows and their frames and thresholds for door
7610.90.00	13	other

Applicant's interest as an affected party

Studform manufactures doors, access panels, aluminum ceiling systems and distributes aluminum partitioning systems to the Australian and New Zealand construction industry.

The goods subject of this application are used inputs to the manufacture of Studform's ceiling systems. Typical ceiling systems include sections of 1.2mm in either W angle, standard angle, shadow line T Bar or standard T Bar sections, commonly used in seismic installations on Australian projects.

Critically, as part of quality control procedures, consistency and reliability of finish have proven important as related to press diameters being no greater than 4.5 inches. Typically, past experience has shown that particularly the T sections can more easily generate face imperfections when run on larger presses

The goods represent a base product in preparation for value added features and processing on Australian shores. The extruded product is run through press tools and processing on Australian shores effectively value adding the material. The tolerances needed including wall thickness parameters are crucial for successful tool performance.

Details of other parties likely to have an interest in this exemption application and their interests in this application

Pan Asia Aluminum Pty Ltd – importer of the goods

Capral Aluminum who supply aluminium extrusions through Allied Buying Group

Grounds on which we are seeking the exemption

Like or directly competitive goods are not offered for sale in Australia to all purchasers on equal terms under like conditions having regard to the custom and usage of trade

Evidence that all known Australian producers have been contacted in writing and asked whether, or not, they can manufacture and supply goods, the terms of supply

See attached emails (Confidential Attachment 1) from Capral Aluminum including section drawings that confirm their dies are unable to process extrusions thicker than 1.2mm through their press tooling.

Details of the current investigation or the anti-dumping and countervailing measures applying to the goods

The goods subject to measures:

Aluminium extrusions produced via an extrusion process, of alloys having metallic elements falling within the alloy designations published by The Aluminium Association commencing with 1, 2, 3, 5, 6 or 7 (or proprietary or other certifying body equivalents), with the finish being as extruded (mill), mechanical, anodized or painted or otherwise coated, whether or not worked, having a wall thickness or diameter greater than 0.5 mm, with a maximum weight per meter of 27 kilograms and a profile or cross-section which fits within a circle having a diameter of 421 mm.

The goods (relevant to ADN 2021/033 Mill Finish) apply to mill finish aluminium extrusions with a finish being as extruded (mill), excluding all other surface finishes.

The goods (relevant to ADN 2021/035 Surface Finish) apply to surface finish aluminium extrusions with the finish being mechanical, painted, powder coated, anodised or otherwise coated (excluding mill-finish).

The goods subject to measures include aluminium extrusion products that have been further processed or fabricated to a limited extent, after aluminium has been extruded through a die. Aluminium extrusion products that have been painted, anodised, or otherwise coated, or worked (e.g. precision cut, machined, punched or drilled) fall within the scope of the goods.

The countries subject to measures are China, Malaysia and Vietnam.

Detailed statement setting out reasons for seeking an exemption

Despite reaching out to multiple companies extruding aluminum on Australian shores we have been unable to obtain a solution within our specifications.

Furthermore, as part of our quality control procedures we specifically prefer/require these extrusions to be run on 3.5 to 4.5 inch extrusion press dies, none of which exist to our knowledge in Australian mills.

Yours sincerely



David Wright
Managing Director
21/6/2021