

23 October 2014

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Ms Kerry Taylor
Director, Dumping Operations 4
Anti-Dumping Commission
1010 La Trobe Street
DOCKLANDS VICTORIA 3008

Email: Kerry.Taylor@adcommission.gov.au

Dear Ms Taylor

For Public File

Review of Anti-Dumping Measures on Certain Aluminium Road Wheels exported from P R China

Dragway Performance Engineering ("Dragway") is a fully owned Australian company and has been a market leader in Australia in the design and manufacture of street, race-car, American motorcycle and quality custom wheels for over 30 years.

Dragway also manufactures aluminium road wheels ("ARWs") within its production capability in Australia.

Dragway has previously participated in the original investigation (Investigation No. 181) into ARWs exported from China as a member of the Australian industry. Dragway has noted the commencement of a review investigation into ARWs exported from China as announced in Australian Dumping Notice ("ADN") No. 2014/86. It is asserted by the applicant – Jiangsu Yaozhong Aluminium Wheels Co., Ltd ("Jiangsu") – that as the LME price for aluminium has declined in the period July 2013 to June 2014 by approximately 25 per cent, there is also a 25 per cent decline in the normal values for ARWs sold in China.

Respectfully, Dragway rejects Jiangsu's claims. The claimed reduction in the LME aluminium price was a temporary reduction. LME aluminium prices have recovered in 2014 and have recovered to similar levels to prices in the original investigation. It is Dragway's understanding that the review of the measures can culminate in the Anti-Dumping Commission ("the Commission") recommending to the Parliamentary Secretary that the dumping and countervailing notices remain unaltered or, reflect recent/contemporary variable factors.

It is Dragway's position that the variable factors should remain unaltered in light of the recent LME aluminium (and aluminium alloy) price recovery. A recommendation to alter the variable factors based upon the temporary reduction in the LME aluminium price will result in a recurrence of material injury to the Australian industry and is not supported.

Dragway has attached a summary of its sales volumes and value for car wheels in 2013/14 (See Confidential Attachment 1) and is willing to provide the Commission with further costing details on its financial performance over the 2013/14 investigation period, as required.

If you have any questions concerning this letter, please do not hesitate to contact the undersigned on (07) 3808 3805, or Dragway's nominated representative John O'Connor on (07) 3342 1921.

Yours sincerely



Ian Splatt
Managing Director