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2 September 2015

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By email

Dear Kerry

Guangdong Jinxiecheng Aluminium Manufacturing Co., Ltd Dumping and countervailing margin

We have been instructed to contact you on behalf of Guangdong Jinxiecheng Aluminium Manufacturing Co., Ltd ("GDJ").

GDJ respectfully requests that the Commissioner recommend to the Parliamentary Secretary that she exercise her discretion under Section 269ZH(4)(iii) of the *Customs Act 1901* to fix different variable factors for GDJ's exports at the conclusion of the current continuation inquiry regarding certain aluminium extrusions exported to Australia from the People's Republic of China ("the Inquiry"), rather than simply adopting the "residual exporter" variable factors that were imposed at the conclusion of the recent review of anti-dumping and countervailing measures regarding certain aluminium extrusions exported from the People's Republic of China ("the Review").

Six months prior to the initiation of the Review the Commission completed an accelerated review of GDJ's aluminium extrusion exports, which determined that they were not exported at dumped prices. However, in the subsequent Review, despite GDJ submitting a full exporter questionnaire ("EQ") response, GDJ was categorised as a "residual exporter". GDJ was not made aware of this characterisation until the Statement of Essential Facts for the Review ("the SEF") had been released.


Following the publication of the SEF, GDJ made submissions to that Review, seeking to have its own variable factors determined. On GDJ's calculations, it had a significant no-dumping margin. Nonetheless, when the measures were imposed, GDJ remained a "residual exporter" subject to the higher dumping and subsidy margins applicable to that category of exporters.

GDJ has also submitted an updated EQ response for the purpose of the current Inquiry. GDJ's EQ response again illustrates the fact that GDJ continues not to dump its products on the Australian market nor to benefit from any countervailable subsidies.

In the context of GDJ's previous position, as well as its full cooperation with the Commission in the Review and this Inquiry, the decision to include GDJ as a "residual exporter" with an effective rate of 17.5% is considered to be a harsh one.

GDJ has faithfully submitted the information necessary for the Commission to calculate its variable factors for the period under consideration in the Inquiry in a clear and legible manner. Accordingly,

we respectfully request that the Commission calculate GDJ's own dumping and countervailing variable factors and margins, using the power available to it to do so in the context of a continuation inquiry such as this.



Alistair Bridges
Senior Lawyer