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Anti-Dumping Commission

FILE NOTE

EXEMPTION INQUIRY EX0068

ALUMINIUM EXTRUSIONS

MEETING WITH CONCRETE FORMWORK TECHNOLOGIES PTY LTD

14 November 2018

PRESENT:

Concrete Formwork Technologies Pty Ltd	Yuri Posa	Managing Director
	Robert Sladojevic	Managing Director
	Bethany Clark	Consultant
Anti-Dumping Commission	Jukka Mäntynen	Assistant Director
	Hayden Grigg	Investigator

The visit to Concrete Formwork Technologies Pty Ltd (CFT) was conducted to discuss and seek information pertaining to Exemption Inquiry EX0068 and to analyse claims made by CFT.

The meeting was held at CFT's premises in Kent Town, Adelaide.

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 and cannot be granted against criteria such as the size of the applicant company.

Clarification of the exemption goods

- Jukka indicated that the inquiry is in respect of the goods as described in the relevant notice 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 system branded as *Spartan Sideform*. CFT markets its side form system to customers as a complete concrete casting product. The exemption goods (certain aluminium extrusions) are used for the side forms.

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Physical properties of the exemption goods

- CFT described the various properties of the exemption goods and how they relate to their products.
- CFT provided evidence of product tests, *Spartan Sideform* brochures and technical specifications. CFT stated that it has tested a combination of properties and provided relevant specification sheets.

Timing for commercialisation of full range

 Commercialisation of the full range of Spartan Sideform products has been delayed, partly because certain sizes are deemed to not be commercially viable with the current measures in place.

Details of large sizes

 CFT indicated that currently larger sizes of pre-cast concrete formwork sideforms are generally used to make thick insulated wall panels and columns and in Australia are made using wooden side forms.

Consequences of supplier not providing entire range

- CFT stated that its *Spartan Sideform* system is designed and sold as a comprehensive system, with no ability to mix and match different magnets with different sideforms. CFT stated that it needs to cater to all pre-casters' formwork requirements and that wooden sideforms are currently used for sizes which cannot be provided.
- CFT stated that wooden sideforms are not nearly as effective as aluminium extrusions and
 its customers are demanding that the full size range of the sideforms be supplied as soon as
 possible.
- CFT stated that the wooden sideforms are slow and labour intensive to install and remove and are not cost effective. The wooden sideforms are generally only good for one use and do not provide anywhere near the quality, accuracy and finish to the product as produced by the CFT aluminium formwork)

Verification of sales to date of the exemption goods

• CFT provided relevant documents to allow the Commission to verify its sales to date of the exemption goods.

Verification of purchases to date of the exemption goods

• CFT provided relevant documents to allow the Commission to verify its purchases to date of the exemption goods.

Overview of costs

- CFT described its findings related to cost differences between various materials that are used in aluminium extrusions.
- CFT indicated that cost differences between certain materials that are used in aluminium extrusions are much greater in Australia than in other countries and that this results in the particular Australian extrusions it needs being much more expensive than imported goods.
- CFT stated that its aluminium extrusions represent approximately 20 per cent of the cost of its *Spartan Sideform* system.

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Identification of suppliers

- The exemption goods are supplied to CFT by a Chinese manufacturer that also provided a range of other services and products.
- CFT indicated that splitting its supply of aluminium extrusions between two or more suppliers would be costly due to shipping costs, production times, quality assurance and packaging.
- CFT indicated that splitting its supply of aluminium extrusions between two or more suppliers might result in the anomalous circumstance where smaller sizes are more expensive than larger sizes. CFT stated that these price discrepancies would have a significant negative impact on its ability to do business.
- It was noted that the Chinese manufacturer has not cooperated with the Commission in any of its investigations, inquiries or reviews.

Ownership and matters related to dies

- CFT indicated that intellectual property in relation to dies for its products is owned by a related entity, SRB.
- CFT provided a copy of its patent related to its sideform system.
- CFT provided a copy of its Non-Disclosure, Non-Competition and Non-Circumvention Agreement with its supplier.

Quotations received

- CFT indicated that it has attempted to source the goods from the Australian industry, but the entire range cannot be produced and the costs and services offered were not competitive.
- CFT provided quotations and relevant documentation that it has received from the Australian industry for tooling and extrusions.
- CFT indicated that comments and quotes that it has received from the Australian industry either directly indicate that it is unable to supply the exemption goods, or fail to include sufficient details to confirm the goods being quoted meet the required specifications.
- CFT indicated that it has received tooling quotes, including cost recovery methods, which the Australian industry has indicated are not negotiable. CFT stated that Australian tooling prices have increased significantly since 2008.
- CFT indicated that the cost of aluminium extrusions and tooling, including cost recovery methods, from China are significantly lower than those of the Australian industry.
- CFT indicated that its Chinese supplier was able to offer more options for the recovery of tooling costs and in relation to minimum quantities compared to those provided by the Australian industry.
- CFT undertook to provide the Commission with relevant quotes and documents related to tooling from its Chinese supplier.
- CFT provided copies of its internal workings to compare quotes received from Australian extruders.

Production

• CFT discussed its future sales projections, the drivers in the market, its market share and opportunities in foreign markets.