

Operational Policy
Trade Remedies Authority
North Gate House
21-23 Valpy Street
Reading
RG1 1AF



Reference AD 0012

We write to you as a group of companies that represent a significant downstream trade value in the UK Aluminium sector importing and distributing material that is now subject to investigation by the Trade Remedies Authority under complaint AD0012.

The UK Aluminium sector consumes 365K tonnes of Aluminium extrusion a year, the UK has a capacity to produce around 100K tonnes and the UK imports around 250K tonnes a year to satisfy the growing demand of the sector.

Once this material has been imported, its value is increased substantially as it moves through the downstream supply chain, being processed into finish products for consumption in the UK manufacturing sector and export sustaining thousands of jobs.

Distribution provides a critical link with producers in the Aluminium sector and the wider manufacturing supply chain, working in established partnerships developing downstream markets giving producers access to complex thriving UK supply chains. Our knowledge, capability and understanding of managing complex supply chains brings the perfect balance of quality, value and end user service complimenting and supporting UK producers.

Whilst we appreciate the need to support the UK manufacturing sector from dumped or subsidised material that damages growth and investment, there is a need to ensure that the TRA consider the economic contribution that we as a group of companies make to the UK manufacturing sector and indeed all signatories to this letter are investing in UK manufacturing.

The TRA also needs to recognise and accept that within the capability of UK Aluminium extruders, they do not manufacture the complete range of products consumed through the downstream supply chain as press sizes are restricted to < 300mm. This would exclude approximately 20% of our end customer requirements.

Our concern is the process the TRA has employed whilst investigating AD0012 and their understanding and knowledge of the Aluminium sector from an importer / distribution perspective.

1. The complex nature of how Aluminium is priced being a traded commodity
2. The economic contribution made into the UK
3. The support employment through the downstream supply chain
4. The understanding of how to replace 250K tonnes of material if AD0012 is implemented
5. The economic burden to the supply chain that anti-dumping tariffs will have
6. The effect of employment and investment in the sector and wider supply chain

A significant failure of the TRA in their investigation is to bring an equitable balance to the process. In any investigation due diligence is required to ensure every element is considered from both parties, this has not been the case in AD0012.

The TRA have been active in visiting the complaint of AD0012 to audit and understand the landscape, however when invited by some of the signatories of this letter they were not taken up. How can the TRA ever understand the industry or sector fully if it doesn't give a fair hearing to both the complaint of AD0012 and those who oppose it?

The following must be addressed.

1. Why does the TRA feel it doesn't need to visit organisations opposed to AD0012?
2. How do they expect to understand the entire sector?
3. How do they expect to produce a report that will significantly affect the sector without all the information and facts?
4. Do they understand the substantial economic impact on the sector if AD0012 is implemented?
5. Why is there such a rush to complete this?

We would welcome further discussion with the TRA and at the very least some of the signatories are visited by the TRA to understand this significant element of the UK Aluminium sector.

Yours Sincerely



Managing Director



Managing Director



Managing Director



Managing Director



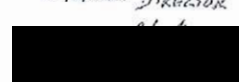
Purchasing Director



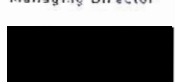
Managing Director



Company Position



Managing Director



Managing Director

