AD0012 ALUMINIUM EXTRUSIONS

COMMENTS ON THE SEF

FROM GARNALEX

OPEN FOR INSPECTION

The Trade Remedies Authority has proposed in SEF §434 to exclude extrusions having a maximum cross-sectional diameter greater than 310mm and a weight per metre of greater than 14kg from the intended final measures. The TRA has based this determination on a finding, in SEF §435 that these goods are not manufactured by the UK industry and have not, or are not, causing injury to the UK industry.

A more detailed examination of the capacity of the UK industry to produce >310mm and >14kg/m extrusions is found in SEF §78 to §82. It is clear from SEF §58 that the two producers referred to in SEF §80 include Garnalex. SEF §82 states that '*UK producers do not have the capability to produce these goods*.'

In this submission, Garnalex informs the TRA that it has the capability to produce extrusions with a cross-sectional diameter greater than 310mm and heavier than 14kg/m [CONFIDENTIAL AS IT CONCERNS BUSINESS SECRETS]. As the TRA is aware Garnalex [confidential as it contains business sensitive information] and the exclusion of extrusions of these sizes and weights will cause it injury.

Garnalex has the capability to produce extrusions >310mm

Garnalex uses extrusion tools provided by the company [BUSINESS SENSITIVE INFORMATION]. The [BUSINESS CONFIDENTIAL] press that the TRA has verified to be present in Garnalex is [BUSINESS SENSITIVE INFORMATION]

It is thus clear that Garnalex has the capability to produce extrusions with a cross-sectional diameter of 400mm and not a maximum of 280mm as stated in SEF §81.

Garnalex has examined the PMI Press Information table referred to in footnote 8 of the SEF which is the basis of the TRA claim that a 9 inch billet press cannot make extrusions >280mm. The PMI Press Information[1] does not provide any source for the information. It can be presumed that this information refers to the capacities of the presses operated by PMI. It does not refer to the presses operated by Garnalex. In any event, Garnalex notes that the PMI Press Information indicates that 9 inch billet presses are capable of making extrusions with a cross-sectional diameter of 390mm depending on the shapes.

Garnalex concludes that the TRA has based its conclusions as to its capability to produce extrusions >310mm on factual data which is not applicable to it and does not appear to be in line with the PMI source material the TRA has used.

[1] http://www.pressmetalukltd.com/pressmetal-v2/pmi_extrusion.html

The Garnalex [business sensitive information]

[THIS SECTION DISCUSSES GARNALEX BUSINESS AND PRODUCTION CAPABILITIES AND IS INHERENTLY COMMERCIALLY SENSITIVE]

Extrusions with a weight above 14kg per meter

Despite the separate findings in SEF §80 and SEF §81 in relation to >14kg/m and >310mm it is clear from SEF §82 and SEF §434 that the exclusion of certain extrusions is based on meeting two criteria, namely above 310mm and heavier than 14kg. per meter. These criteria are cumulative. However, there is no indication of what evidence the TRA used for the separate finding in SEF §80 in relation to weight.

The weight per meter is not directly linked to the diameter of an extrusion. It is linked to the power of the press to press the aluminium through the die. [BUSINESS SENSITIVE INFORMATION]

For this reason, Garnalex contests the finding that it is not able to produce extrusions with a weight above 14kg per meter.

Conclusions

Garnalex concludes that the TRA proposal to exclude extrusions greater than 310mm and heavier than 14kg/m is not based on facts either in relation to Garnalex's capabilities or on the source material used.

Garnalex is concerned that the exclusion of certain sized and weighted extrusions from the scope of the Goods Concerned will:

i) Inhibit its ability to [business sensitive information]
ii) Inhibit its ability to tender for work that requires both large and small extrusions;
iii) Lead to circumvention of the measures in place.

For these reasons, Garnalex asks that the TRA reviews its proposal to exclude extrusions >310mm and >14kg/m.

Annex: [BUSINESS SENSITIVE INFORMATION]