

Anti-Dumping Commission
<https://consult.industry.gov.au/itrf-proposed-tor>
14 October 2024



Dear Ms Lueckenhausen,

Re: International Trade Remedies Forum (ITRF) proposed Terms of Reference (ToR)

The Australian Aluminium Council (the Council) represents Australia's bauxite mining, alumina refining, aluminium smelting and downstream processing industries. The aluminium industry has been operating in Australia since 1955, and over the decades has been a significant contributor to the nation's economy. The industry directly employs more than 20,000 people and indirectly supports a further 55,000 families, predominantly in regional Australia. The integrated nature of bauxite mining, alumina refining, aluminium smelting and extrusion processes in Australia means that efficient and effective regulatory processes for each step are critically important to the ongoing operation of the overall system.

The integrated bauxite, alumina, aluminium and downstream industry provides a sovereign capability that increases the value added contribution to the Australian economy. The local production of aluminium lowers logistic risks and improves the competitiveness of the vertically integrated industry and other sectors. The vertically integrated aluminium industry can provide further sovereign capability and product reliability by minimising the dependency on foreign sourced long-term inputs used in the production of alumina and aluminium. By manufacturing production inputs within Australia, the industry provides additional value add and employment to the economy. However, currently the unfair import competition in the downstream sectors of the industry is believed to be threatening future production and community outcomes. Downstream sectors of industry are exposed to foreign competitors, that at times sell below the price of production. The Australian importation of extruded and fabricated aluminium has increased with the dumping of aluminium products that have subsidised production costs. The Department of Foreign Affairs and Trade have reported a steady increase in the importation of extruded aluminium and fabricated aluminium structures since 2010¹. Anti-dumping measures on aluminium extrusion and fabricated products occur within international markets. Markets that apply an anti-dumping measure, such as import tariffs or quotas on aluminium extrusions, include the USA, UK, Europe Union, and Canada. These anti-dumping measures recognise that unfair trade practices are causing harm to domestic aluminium extruders.

The Council has been a Member of the ITRF since February 2024, and as such has had the opportunity to review and input into the proposed Terms of Reference. The Council is satisfied that these are fit for purpose to enable the ITRF to appropriately advise the Australian Government on running and improving Australia's anti-dumping and countervailing laws. The Council supports strong action by the Australian government to protect against cost subsidised imported aluminium. This should include further strengthening the trade remedies process to better protect domestic industries against these practices to ensure free and fair trade. The Council looks forward to continuing to work with the ITRF under these new Terms of Reference to help ensure there is free and fair trade in Australia.

Kind regards,

A handwritten signature in black ink, appearing to read 'mjohnson'.

Marghanita Johnson
Chief Executive Officer
Australian Aluminium Council
M +61 (0)466 224 636
marghanita.johnson@aluminium.org.au

¹ Department of Foreign Affairs and Trade, [Trade and statistical pivot table](#).