



Canadian International  
Trade Tribunal

Tribunal canadien du  
commerce extérieur

CANADIAN  
INTERNATIONAL  
TRADE TRIBUNAL

# Dumping and Subsidizing

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## ORDER AND REASONS

Expiry Review No. RR-2018-008

Aluminum Extrusions

*Order and reasons issued  
Monday, January 13, 2020*

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IN THE MATTER OF an expiry review, pursuant to subsection 76.03(3) of the *Special Import Measures Act*, of the order made by the Canadian International Trade Tribunal on March 17, 2014, in Expiry Review No. RR-2013-003, continuing, without amendment, its findings made on March 17, 2009, in Inquiry No. NQ-2008-003, as amended by its determination made on February 10, 2011, in Inquiry No. NQ-2008-003R, concerning:

**ALUMINUM EXTRUSIONS ORIGINATING IN OR EXPORTED FROM THE  
PEOPLE'S REPUBLIC OF CHINA**

**ORDER**

The Canadian International Trade Tribunal, pursuant to subsection 76.03(3) of the *Special Import Measures Act*, has conducted an expiry review of its order made on March 17, 2014, in Expiry Review No. RR-2013-003, continuing, without amendment, its findings made on March 17, 2009, in Inquiry No. NQ-2008-003, as amended by its determination made on February 10, 2011, in Inquiry No. NQ-2008-003R, concerning the dumping and subsidizing of aluminum extrusions produced via an extrusion process of alloys having metallic elements falling within the alloy designations published by The Aluminum Association commencing with 1, 2, 3, 5, 6 or 7 (or proprietary or other certifying body equivalents), with the finish being as extruded (mill), mechanical, anodized or painted or otherwise coated, whether or not worked, having a wall thickness greater than 0.5 mm, with a maximum weight per metre of 22 kg and a profile or cross-section which fits within a circle having a diameter of 254 mm, excluding the products described in the attached appendix, originating in or exported from the People's Republic of China.

Pursuant to paragraph 76.03(12)(b) of the *Special Import Measures Act*, the Canadian International Trade Tribunal hereby continues its order in respect of the aforementioned goods.

Georges Bujold  
\_\_\_\_\_  
Georges Bujold  
Presiding Member

Serge Fréchette  
\_\_\_\_\_  
Serge Fréchette  
Member

Randolph W. Heggart  
\_\_\_\_\_  
Randolph W. Heggart  
Member

## APPENDIX

### PRODUCTS EXCLUDED FROM THE FINDINGS IN INQUIRY NO. NQ-2008-003

- Aluminum extrusions produced from either a 6063 or a 6005 alloy type with a T6 temper designation, in various lengths, with a powder coat finish on both the interior and the exterior surfaces of the extrusion, which finish is certified to meet the American Architectural Manufacturers Association AAMA 2603 standard, “Voluntary Specification, Performance Requirements and Test Procedures for Pigmented Organic Coatings on Aluminum Extrusions and Panels”, for use in exterior railing systems.
- Aluminum extrusions produced from a 6063 alloy type with a T5 temper designation, having a length of 3.66 m, with a powder coat finish, which finish is certified to meet the American Architectural Manufacturers Association AAMA 2603 standard, “Voluntary Specification, Performance Requirements and Test Procedures for Pigmented Organic Coatings on Aluminum Extrusions and Panels”, for use as head rails and bottom rails in fabric window shades and blinds where the fabric has a cross-sectional honeycomb or “cellular” construction.
- Aluminum extrusions produced from a 6063 alloy type with a T5 temper designation and forming part of the Vario System™ 20, 30, 40, 45 and 60 series line of profiles, or equivalent, having a length of either 4.5 or 5.8 m and a straightness tolerance of +/-1.5 mm or less per 6.0 m of length, for use in those parts of mechanical systems and automated machinery, such as gantry systems and conveyors, where precise linear movement is required.
- Aluminum extrusions produced from either a 6063 or a 6463 alloy type, having a length of 3 m, with a hand-applied gold and silver leaf finish, for use as picture frame mouldings.
- Aluminum extrusions produced from a 6063 alloy type with either a T5 or a T6 temper designation, having a length of between 20 and 33 ft. (between 6.10 and 10.06 m), with a powder coat finish, which finish is certified to meet the American Architectural Manufacturers Association AAMA 2603 standard (“Voluntary Specification, Performance Requirements and Test Procedures for Pigmented Organic Coatings on Aluminum Extrusions and Panels”), for use in window frames.
- Heat sinks imported under tariff item No. 8473.30.90 and weighing 700 g or less.

**ADDITIONAL PRODUCTS EXCLUDED FROM THE FINDINGS IN INQUIRY  
NO. NQ-2008-003 FOLLOWING THE DETERMINATION IN INQUIRY NO. NQ-2008-003R**

- Aluminum extrusions produced by China Square Industrial Ltd. from either a 6063 or a 6463 alloy type with a T5 temper designation, with a profile or cross-section which fits within a circle having a diameter of 100 mm, for use by MAAX Bath Inc. in the assembly of its shower enclosures, specifically identified in the following table:

Part Number	Description	Alloy	Die Number	Length (m)	Density (kg/m)	Wall Thickness (mm)	Fabrication	Finish
10004475-084	ALUMINUM - PLC01 67.62" CH	6463	PLC01	1.7175	0.3839	1.27	Precision cut, punched	Mechanical polish, bright dip chrome
10004475-085	ALUMINUM - PLC01 67.62" PB	6463	PLC01	1.7175	0.3839	1.27	Precision cut, punched	Mechanical polish, bright dip gold
10004475-105	ALUMINUM - PLC01 67.62" BN	6463	PLC01	1.7175	0.3839	1.27	Precision cut, punched	Mechanical polish, bright dip nickel
10004477-084	ALUMINUM - PLC03 67.62" CH	6463	PLC03	1.7175	0.6072	1.27	Precision cut, punched	Mechanical polish, bright dip chrome
10004477-085	ALUMINUM - PLC03 67.62" PB	6463	PLC03	1.7175	0.6072	1.27	Precision cut, punched	Mechanical polish, bright dip gold
10004477-105	ALUMINUM - PLC03 67.62" BN	6463	PLC03	1.7175	0.6072	1.27	Precision cut, punched	Mechanical polish, bright dip nickel
10004479-084	WALL JAMB PNA01 71.74" CH	6463	PNA01	1.8222	0.3125	1.27	Precision cut, punched	Mechanical polish, bright dip chrome
10004487-084	ALUMINUM - PR02 CURVED 7436 CH	6463	PR02	1.6167	0.3988	1.143	Precision cut, bent	Mechanical polish, bright dip chrome
10004487-084-011	ALUMINUM - PR02 11 7436 CB CLEAR	6463	PR02	1.6167	0.3988	1.143	Precision cut, bent	Mechanical polish, bright dip chrome
10004487-084-601	BOTTOM TRACK 1604MM (PR-02) CHR	6463	PR02	1.6040	0.3988	1.143	Precision cut, bent	Mechanical polish, bright dip chrome
10004487-085-601	BOTTOM TRACK 1604MM (PR-02) GLD	6463	PR02	1.6040	0.3988	1.143	Precision cut, bent	Mechanical polish, bright dip gold
10004487-105-601	BOTTOM TRACK 1604MM (PR-02) NIC	6463	PR02	1.6040	0.3988	1.143	Precision cut, bent	Mechanical polish, bright dip nickel
10004488-084	ALUMINUM - PR03R1 71.74" CH	6463	PR03R1	1.8222	0.4494	1.27	Precision cut	Mechanical polish, bright dip chrome
10004488-105	ALUMINUM - PR03R1 71.74" BN	6463	PR03R1	1.8222	0.4494	1.27	Precision cut	Mechanical polish, bright dip nickel
10004491-084	ALUMINUM - PR06R1 71.74" CH	6463	PR06R1	1.8222	0.4301	1.27	Precision cut, punched	Mechanical polish, bright dip chrome
10004491-085	ALUMINUM - PR06R1 71.74" PB	6463	PR06R1	1.8222	0.4301	1.27	Precision cut, punched	Mechanical polish, bright dip gold

Part Number	Description	Alloy	Die Number	Length (m)	Density (kg/m)	Wall Thickness (mm)	Fabrication	Finish
10004492-084	ALUMINUM - PR08 69.20" CH	6463	PR08	1.7577	0.2560	1.27	Precision cut, punched	Mechanical polish, bright dip chrome
10004492-085	ALUMINUM - PR08 69.20" PB	6463	PR08	1.7577	0.2560	1.27	Precision cut, punched	Mechanical polish, bright dip gold
10004492-105	ALUMINUM - PR08 69.20" BN	6463	PR08	1.7577	0.2560	1.27	Precision cut, punched	Mechanical polish, bright dip nickel
10004495-084	ALUMINUM - PR10 CURVED 7436-7536 CH	6463	PR10	1.6167	0.3899	1.27	Precision cut, punched	Mechanical polish, bright dip chrome
10004495-084-006	ALUMINUM - PR10 06 7436 CH	6463	PR10	1.6167	0.3899	1.27	Precision cut, bent	Mechanical polish, bright dip chrome
10004495-084-601	TOP TRACK 1604MM (PR-10) CHR	6463	PR10	1.6040	0.3899	1.27	Precision cut, bent	Mechanical polish, bright dip chrome
10004495-085-006	ALUMINUM - PR10 06 7436 PB	6463	PR10	1.6167	0.3899	1.27	Precision cut, bent	Mechanical polish, bright dip gold
10004495-085-601	TOP TRACK 1604MM (PR-10) GLD	6463	PR10	1.6040	0.3899	1.27	Precision cut, bent	Mechanical polish, bright dip gold
10004495-105-601	TOP TRACK 1604MM (PR-10) NIC	6463	PR10	1.6040	0.3899	1.27	Precision cut, bent	Mechanical polish, bright dip nickel
10004496-084	ALUMINUM - PR3601 71.74" CH	6463	PR3601	1.8222	0.3676	1.27	Precision cut, punched	Mechanical polish, bright dip chrome
10004496-105	ALUMINUM - PR3601 71.74" BN	6463	PR3601	1.8222	0.3676	1.27	Precision cut, punched	Mechanical polish, bright dip nickel
10004570-084	WALL JAM CH	6063	137xxx- 003	2.0800	0.6830	1.5	Precision cut, punched	Mechanical polish, bright dip chrome
10008881-105	ALUMINUM - PR02 CURVED 7532 54.15" BN	6463	PR02	1.2230	0.3988	1.143	Precision cut, bent	Mechanical polish, bright dip nickel
10014464-128-002	WALL JAMB 72 9/16 SPTW-A4763	6463	A4763	1.8431	0.3914	1.27	Precision cut	Powder Coat White
10014465-084-001	JAMB RAIL 72 9/16 CHR -A4764	6463	A4764	1.8431	0.5164	1.27	Precision cut	Mechanical polish, bright dip chrome
10014465-128-001	JAMB RAIL 72 9/16 SPTW-A4764	6463	A4764	1.8431	0.5164	1.27	Precision cut	Powder coat white
10014467-128-001	POST RAIL 69 7/8 SPTW- A4766	6463	A4766	1.7748	0.3333	1.27	Precision cut	Powder coat white
10014467-128-003	POST RL 67 21/64 SPTW- A4766 K33908 (P)	6463	A4766	1.7101	0.3333	1.27	Precision cut	Powder coat white
10014471-084-002	TOP DR RAIL 51 13/16 CHR -A5077	6463	A5077	1.3161	0.3512	1.27	Precision cut, punched	Mechanical polish, bright dip chrome
10014473-084-002	POST RAIL CAP 71 11/16 CHR -A5370	6063	A5370	1.8209	0.3810	1.27	Precision cut	Mechanical polish, bright dip chrome
10014477-084-001	JAMB RAIL 73 9/16 CHR -A5454	6463	A5454	1.8685	0.4316	1.27	Precision cut	Mechanical polish, bright dip chrome

Part Number	Description	Alloy	Die Number	Length (m)	Density (kg/m)	Wall Thickness (mm)	Fabrication	Finish
10014478-001-601	D.T/B RAIL,22.25,WHT,A5455M11	6463	A5455	0.5652	0.3423	1.27	Precision cut	Powder coat white
10014478-001-602	D.T/B RAIL,21.81" WHT, A5455M12	6463	A5455	0.5540	0.3423	1.27	Precision cut	Powder coat white
10014478-001-603	D.T/B RAIL,25.94, WHT, A5455M13	6463	A5455	0.6589	0.3423	1.27	Precision cut	Powder coat white
10014478-084-001	T/B DR RAIL 68 CHR - A5455	6463	A5455	1.7272	0.3423	1.27	Precision cut	Mechanical polish, bright dip chrome
10014502-128-003	PNL P.RAIL,70.00",SPTW, A5903M	6463	A5903	1.7780	0.5834	1.27	Precision cut	Powder coat white
10014505-001-601	JAMB RAIL,72.50", WHT, A5907M	6463	A5907	1.8415	0.4435	1.27	Precision cut, punched	Powder coat white
10014506-001-601	DOOR S.RAIL,69.19" WHT, A5908M2	6463	A5908	1.7574	0.2128	1.27	Precision cut, punched	Powder coat white
10014506-001-602	DOOR S. RAIL,67 23/32 WHT A5908M1	6463	A5908	1.7201	0.2128	1.27	Precision cut, punched	Powder coat white
10014508-084-002	HANDLE 71 CHR -A5946	6463	A5946	1.8034	0.3661	1.27	Precision cut	Mechanical polish, bright dip chrome
10014508-128-001	HANDLE 70 SPTW-A5946	6463	A5946	1.7780	0.3661	1.27	Precision cut	Powder coat white
10014509-084-002	SIDE RAIL 71 CHR - A5947	6463	A5947	1.8034	0.2917	1.27	Precision cut	Mechanical polish, bright dip chrome
10014509-128-001	SIDE RAIL 70 SPTW-A5947	6463	A5947	1.7780	0.2917	1.27	Precision cut	Powder coat white
10014512-128-001	T/B PNL RAIL 72 SPTW-A5955	6463	A5955	1.8288	0.2560	1.27	Precision cut	Powder coat white
10014872-128	(R)TP RAIL,28.12,SPTW,A5076 M1 K19491 (P)	6463	A5076	0.7142	0.5729	1.27	Precision cut, punched, drilled	Powder coat white
10014873-128	(L)TP RAIL,28.12,SPTW A5076M K19492 (P)	6463	A5076	0.7144	0.5729	1.27	Precision cut, punched, drilled	Powder coat white
10014917-128	(L)RAIL BTM,28.12,SPTW A5561M1 K20938 P	6463	A5561	0.7144	0.4241	1.27	Precision cut, punched, countersink	Powder coat white
10014918-128	(R)RAIL BTM,28.12,SPTW,A5561 M1 K20939 P	6463	A5561	0.7144	0.4241	1.27	Precision cut, punched, countersink	Powder coat white
10015129-128	WALL JAMB,70.00",SPTW A4763M2 K33904	6463	A4763	1.7780	0.3914	1.27	Precision cut, punched	Powder coat white
10015130-128	(L)JAMB RAIL,70",SPTW A4764M4 K33905 (P)	6463	A4764	1.7780	0.5164	1.27	Precision cut, punched, drilled	Powder coat white
10015131-128	(R)JAMB RAIL,70",SPTW A4764M5 K33906 (P)	6463	A4764	1.7780	0.5164	1.27	Precision cut, punched, drilled	Powder coat white
10015140-128	WALL JAMB, 72.50",SPTW, A5927M	6463	A5927	1.8415	0.3140	1.27	Precision cut, punched	Powder coat white
10015180-128	PNL B.RAIL,12.81,SPTW A4751M5 K34354	6463	A4751	0.3254	0.2887	1.27	Precision cut, drilled	Powder coat white
10015184-128	PNL T.RAIL,12.81,SPTW A5077M5 K34360	6463	A5077	0.3254	0.3512	1.27	Precision cut, drilled	Powder coat white
10015189-128	L.HDL RL,67.44,SPTW,A5946M1 K34371	6463	A5946	1.7130	0.3661	1.27	Precision cut, punched, countersink	Powder coat white

Part Number	Description	Alloy	Die Number	Length (m)	Density (kg/m)	Wall Thickness (mm)	Fabrication	Finish
10015190-128	R.HDL RL,67.44,SPTW,A5946M1 K34372	6463	A5946	1.7130	0.3661	1.27	Precision cut, punched, countersink	Powder coat white
10015193-128	D.SIDE RAIL,67.44,SPTW,A5947 M1 K34378	6063	A5947	1.7130	0.2917	1.27	Precision cut, punched, countersink	Powder coat white
10015208-128	PNL T/B RAIL,16.44"SPTW,A5955 M	6463	A5955	0.4176	0.2560	1.27	Precision cut, punched notch	Powder coat white
10015563-001-001	EXP WALL JAMB 69 5/8" WHT	6463	NCF0002	1.7685	0.2351	1.0414	Precision cut, punched	Powder coat white
10015563-084-001	EXP WALL JAMB CHR 69.625"	6463	NCF0002	1.7685	0.2351	1.0414	Precision cut, punched	Mechanical polish, bright dip chrome
10015574-001-001	WALL JAMB SPTW 69 5/8" WHT (k22)	6463	NCF0001	1.7685	0.1845	1.0414	Precision cut, punched	Powder coat white
10015574-084-001	WALL JAMB CHR 69.625" (k22)	6463	NCF0001	1.7685	0.1845	1.0414	Precision cut, punched	Mechanical polish, bright dip chrome
10015919-084-601	HDR 142 SIL 60 POLY KSD439-02	6463	KSD439-02	1.5240	1.5849	2.032	Precision cut	Mechanical polish, bright dip chrome
10015920-084-601	HEADER 143 KSD-448-01 60" CHR	6463	KSD448	1.5240	1.5477	1.27	Precision cut	Mechanical polish, bright dip chrome
10015922-084-601	WC SIL 56 KSD058-21CH	6463	KSD058	1.4224	0.3244	1.27	Precision cut	Mechanical polish, bright dip chrome
10017557-001-601	WC WHT 70 KSD470-CH01	6463	KSD470	1.7780	0.3289	1.128	Precision cut, punched	Powder coat white
10017557-084-602	WC SIL 71 KSD470-CH	6463	KSD470	1.8034	0.3289	1.128	Precision cut, punched	Mechanical polish, bright dip chrome
10017568-001-601	PNL UPR WHT 70 KSD469-CH01	6463	KSD469	1.7780	0.3973	1.27	Precision cut, punched	Powder coat white
10017568-084-602	PANEL UPRIGHT 71 CH KSD-469	6463	KSD469	1.8034	0.3973	1.27	Precision cut, punched	Mechanical polish, bright dip chrome
10017569-001-601	HDR WHT 27 31/32 KSD480-CH01	6463	KSD480	0.7104	0.7605	1.27	Precision cut, punched	Powder coat white
10017572-001-601	FRONT PNL UPRIGHT 66 1/4" WHT KSD-424	6463	KSD424	1.6828	0.1280	1.27	Precision cut	Powder coat white
10017573-001-602	REAR PNL UPRIGHT 68 1/8" WHT KSD-424	6463	KSD424	1.7305	0.1280	1.27	Precision cut	Powder coat white
10017576-001-601	DR TP-X WHT 13 55/64 KSD481-CH01	6463	KSD481-CH01	0.3520	0.2902	1.27	Precision cut, punched	Powder coat white
10017577-001-601	DR FRT UPR WHT 68 1/8 KSD482-CH01	6463	KSD482	1.7305	0.2292	1.27	Precision cut, punched, punched notch	Powder coat white
10017578-001-601	DR BTM-X WHT 13 55/64 KSD483-CH01	6463	KSD483	0.3520	0.2054	1.27	Precision cut	Powder coat white
10017613-170-602	DOOR UPRIGHT 55 3/16" VELO	6463	KSD492	1.4018	0.1414	1.016	Precision cut, punched	Mechanical polish, bright dip velo
10017614-170-601	DOOR TOP/BTM RAIL 28,25" VELO KSD-493	6463	KSD493	0.7176	0.1801	1.016	Precision cut, punched	Mechanical polish, bright dip velo



Part Number	Description	Alloy	Die Number	Length (m)	Density (kg/m)	Wall Thickness (mm)	Fabrication	Finish
10017737-084-601	PANEL UPRT 70 13/16" CHR KSD923-CH	6063	KSD923-CH	1.7986	0.4911	1.016	Precision cut, punched	Mechanical polish, bright dip nickel
10017740-084-601	WALL CHNL 70 13/16" CHR 332/342KSD922-CH	6063	KSD922-CH	1.7986	0.2857	1.016	Precision cut, punched	Mechanical polish, bright dip nickel
10018339-084-601	TRACK SIL 60 ±1/8 KSD274-01	6463	KSD274	1.5240	0.4941	1.397	Precision cut	Mechanical polish, bright dip chrome
10040787-105	HF20 SERIES WALL JAMB X13 NIC	6063	137595-002	1.7780	0.3800	1.27	Precision cut, punched	Mechanical polish, bright dip nickel
10040788-105	HF20 SERIES WALL JAMB EXTEN X14 NIC	6063	137595-001	1.7780	0.2290	1.27	Precision cut, punched	Mechanical polish, bright dip nickel
10040789-105	HF20 SERIES WALL JAMB EXTENSION X16 NIC	6063	137593-001	1.7780	0.2180	1.27	Precision cut, punched	Mechanical polish, bright dip nickel
10041007-105-001	WALL CHANNEL 67 7/8" NIC (k)	6463	KSD044	1.7240	0.2589	1.5748	Precision cut, punched	Mechanical polish, bright dip nickel
10041009-084-010	DOOR STRICKER 66 11/16 CHR	6463	41009	1.6939	0.2515	1.27	Precision cut	Mechanical polish, bright dip chrome
10041009-105-010	DOOR STRICKER 66 11/16 NIC	6463	41009	1.6939	0.2515	1.27	Precision cut	Mechanical polish, bright dip nickel
10041012-001-002	DR-X WHT 6-7/16 ±1/32 KSD810-02	6063	KSD810	0.1635	0.2219	0.889	Precision cut, punched, punched notch, drilled, bent, countersink	Powder coat white
10041012-001-004	DR-X WHT 11-11/16 ±1/32 KSD810-04	6063	KSD810	0.2969	0.2219	0.889	Precision cut, punched, punched notch, drilled, bent, countersink	Powder coat white
10041012-001-006	DR-X WHT 16-9/16 ±1/32 KSD810-06	6063	KSD810	0.4207	0.2219	0.889	Precision cut, punched, punched notch, drilled, bent, countersink	Powder coat white
10041012-001-008	DR-X WHT 20-11/16 ±1/32 KSD810-07	6063	KSD810	0.5255	0.2219	0.889	Precision cut, punched, punched notch, drilled, bent, countersink	Powder coat white
10041012-001-009	DR-X WHT 20-7/16 ±1/32 KSD810-08	6063	KSD810	0.5191	0.2219	0.889	Precision cut, punched, punched notch, drilled, bent, countersink	Powder coat white
10041012-001-011	DR UPR WHT 28-3/16 ±1/32 KSD810-10	6063	KSD810	0.7160	0.2219	0.889	Precision cut, punched, punched notch, drilled, bent, countersink	Powder coat white

Part Number	Description	Alloy	Die Number	Length (m)	Density (kg/m)	Wall Thickness (mm)	Fabrication	Finish
10041013-001-001	UPR HG WHT 25-1/4 ±1/32 KSD808-02	6063	KSD808	0.6414	0.3962	0.889	Precision cut, punched, punched notch, drilled, bent, countersink	Powder coat white
10041013-001-002	DR UPR HG WHT 29-1/4 ±1/32 KSD808-03	6063	KSD808	0.7430	0.3962	0.889	Precision cut, punched, punched notch, drilled, bent, countersink	Powder coat white
10041025-001-010	JOINT FLANGE 69 5/8" WHT	6463	41025	1.7685	0.4360	1.143	Precision cut, punched, punched notch	Powder coat white
10041025-084-010	JOINT FLANGE 69 5/8" SILVER	6463	41025	1.7685	0.3869	1.143	Precision cut, punched, punched notch	Mechanical polish, bright dip chrome
10041025-085-010	JOINT FLANGE 69 5/8" GOLD	6463	41025	1.7685	0.4360	1.143	Precision cut, punched, punched notch	Mechanical polish, bright dip gold
10041026-001-010	JOINT FRAME 45 DEG 69 5/8 WHT	6463	41026	1.7685	0.3348	1.143	Precision cut, punched, punched notch	Powder coat white
10041026-084-010	JOINT FRAME 45 DEG 69 5/8 SILVER	6463	41026	1.7685	0.3348	1.143	Precision cut, punched, punched notch	Mechanical polish, bright dip chrome
10041026-085-010	JOINT FRAME 45 DEG 69 5/8 GLD	6463	41026	1.7685	0.3348	1.143	Precision cut, punched, punched notch	Mechanical polish, bright dip gold
10041041-001-010	T/B FRAME 13 1/2" WHT	6463	41041	0.3429	0.2723	1.27	Precision cut	Powder coat white
10041041-001-011	T/B FRAME 15 1/2" WHT	6463	41041	0.3937	0.2723	1.27	Precision cut	Powder coat white
10041041-001-012	T/B FRAME 16" WHT	6463	41041	0.4064	0.2723	1.27	Precision cut	Powder coat white
10041041-084-010	T/B FRAME 13 1/2" SILVER	6463	41041	0.3429	0.2723	1.27	Precision cut	Mechanical polish, bright dip chrome
10041041-084-011	T/B FRAME 15 1/2" SILVER	6463	41041	0.3937	0.2723	1.27	Precision cut	Mechanical polish, bright dip chrome
10041041-084-012	T/B FRAME 16" SILVER	6463	41041	0.4064	0.2723	1.27	Precision cut	Mechanical polish, bright dip chrome
10041041-085-011	T/B FRAME 15 1/2" GOLD	6463	41041	0.3937	0.2723	1.27	Precision cut	Mechanical polish, bright dip gold
10041042-084-003	CLOSE SIL 63" SILVER	6463	41042	1.6002	0.4450	1.0414	Precision cut and punched	Mechanical polish, bright dip chrome
10041042-085-003	CLOSE SIL 63" GLD	6463	41042	1.6002	0.4450	1.0414	Precision cut and punched	Mechanical polish, bright dip gold
10041045-001-010	P-U- JAMB 64 1/2" WHT (k)	6463	41045	1.6383	0.2688	1.27	Precision cut and punched	Powder coat white
10041045-084-005	WALL JAMB 76 13/16 CHR	6463	41045	1.9510	0.2688	1.27	Precision cut and punched	Mechanical polish, bright dip chrome
10041045-084-010	P-U- JAMB 64 1/2" SIL (k)	6463	41045	1.6383	0.2688	1.27	Precision cut and punched	Mechanical polish, bright dip chrome

Part Number	Description	Alloy	Die Number	Length (m)	Density (kg/m)	Wall Thickness (mm)	Fabrication	Finish
10041045-085-010	P-U- JAMB 64 1/2" GLD (k)	6463	41045	1.6383	0.2688	1.27	Precision cut and punched	Mechanical polish, bright dip gold
10041047-084-004	PULL FRAME 63 1/2 SIL	6463	41047	1.6129	0.3438	1.0414	Precision cut and punched	Mechanical polish, bright dip chrome
10041061-001-006	WALL JAMB 69 9/16 WHT (k)	6463	41061	1.7669	0.2917	1.397	Precision cut	Powder coat white
10041061-001-007	WALL JAMB 54 11/16" WHT (k)	6463	41061	1.3891	0.2917	1.397	Precision cut	Powder coat white
10041061-001-008	WALL JAMB 64 7/16" WHT (k)	6463	41061	1.6367	0.2917	1.397	Precision cut	Powder coat white
10041061-084-006	WALL JAMB 69 9/16 SIL (k)	6463	41061	1.7669	0.2917	1.397	Precision cut	Mechanical polish, bright dip chrome
10041061-084-007	WALL JAMB 54 11/16" SIL 4106111CTS (k)	6463	41061	1.3891	0.2917	1.397	Precision cut	Mechanical polish, bright dip chrome
10041061-084-008	WALL JAMB 64 7/16" SIL 4106111CTS (k)	6463	41061	1.6367	0.2917	1.397	Precision cut	Mechanical polish, bright dip chrome
10041061-085-006	WALL JAMB 69 9/16 GLD (k)	6463	41061	1.7669	0.2917	1.397	Precision cut	Mechanical polish, bright dip gold
10041061-085-007	WALL JAMB 54 11/16" GLD 4106112CTS (k)	6463	41061	1.3891	0.2917	1.397	Precision cut	Mechanical polish, bright dip gold
10041061-105-006	WALL JAMB 69 9/16 NIC (k)	6463	41061	1.7669	0.2917	1.397	Precision cut	Mechanical polish, bright dip nickel
10041061-105-007	WALL JAMB 54 11/16" NICKEL 4106112CTS	6463	41061	1.3891	0.2917	1.397	Precision cut	Mechanical polish, bright dip nickel
10041063-001-005	BTM TRACK 60" WHT (k)	6463	41063	1.5240	0.3274	1.27	Precision cut	Powder coat white
10041063-084-005	TRACK 60" SIL 4106311 (k)	6463	41063	1.5240	0.3274	1.27	Precision cut	Mechanical polish, bright dip chrome
10041063-085-005	TRACK 60" GLD 4106312 (k)	6463	41063	1.5240	0.3274	1.27	Precision cut	Mechanical polish, bright dip gold
10041063-105-003	TRACK 72 1/2" NICKEL	6463	41063	1.8415	0.3274	1.27	Precision cut	Mechanical polish, bright dip nickel
10041063-105-005	TRACK 60" NICKEL 4106312 (k)	6463	41063	1.5240	0.3274	1.27	Precision cut	Mechanical polish, bright dip nickel
10041064-001-007	BTM FRAME 49" WHT 41064CTS	6463	41064	1.2446	0.2396	1.143	Precision cut	Powder coat white
10041064-001-680	(P) BTM FRAME 28 1/16 WHT	6463	41064	0.7128	0.2396	1.143	Precision cut, punched	Powder coat white
10041064-001-685	(P) BTM FRAME 18 9/16 WHT	6463	41064	0.4715	0.2396	1.143	Precision cut, punched	Powder coat white
10041064-084-007	BTM FRAME 49" SIL 41064CTS	6463	41064	1.2446	0.2396	1.143	Precision cut	Mechanical polish, bright dip chrome
10041064-084-680	BTM FRAME 28" 1/16 SIL(118)	6463	41064	0.7128	0.2396	1.143	Precision cut, punched	Mechanical polish, bright dip chrome

Part Number	Description	Alloy	Die Number	Length (m)	Density (kg/m)	Wall Thickness (mm)	Fabrication	Finish
10041064-084-685	(P) BTM FRAME 18"9/16 SIL (118)	6463	41064	0.4715	0.2396	1.143	Precision cut, punched	Mechanical polish, bright dip chrome
10041064-085-685	(P) BTM FRAME 18"9/16 GLD(118)	6463	41064	0.4715	0.2396	1.143	Precision cut, punched	Mechanical polish, bright dip gold
10041064-105-008	BTM FRAME 56 1/4" NIC 41064CTS	6463	41064	1.4288	0.2396	1.143	Precision cut	Mechanical polish, bright dip nickel
10041065-001-004	TOP FRAME 2 PNL 40 3/4" WHT	6463	41065	1.0351	0.3155	1.27	Precision cut	Powder coat white
10041065-001-612	(P) TOP FRAME 28 1/16 WHT	6463	41065	0.7128	0.3155	1.27	Precision cut, punched	Powder coat white
10041065-084-004	TOP FRAME 2 PNL 40 3/4" SIL	6463	41065	1.0351	0.3155	1.27	Precision cut	Mechanical polish, bright dip chrome
10041065-084-612	TOP FRAME 28"1/16 SIL(118)	6463	41065	0.7128	0.3155	1.27	Precision cut, punched	Mechanical polish, bright dip chrome
10041065-085-002	TOP FRAME 2 PNL 56 3/4" GLD	6463	41065	1.4415	0.3155	1.27	Precision cut	Mechanical polish, bright dip gold
10041067-001-652	(P) TOP FRAME 18 9/16 WHT	6463	41067	0.4715	0.3125	1.27	Precision cut, punched	Powder coat white
10041067-084-002	TOP FRAME 3 PNL 59" SIL 4106711	6463	41067	1.4986	0.3125	1.27	Precision cut	Mechanical polish, bright dip chrome
10041067-084-652	(P) TOP FRAME 18"9/16 (118)	6463	41067	0.4715	0.3125	1.27	Precision cut, punched	Mechanical polish, bright dip chrome
10041067-085-652	(P) TOP FRAME 18"9/16 (118)	6463	41067	0.4715	0.3125	1.27	Precision cut, punched	Mechanical polish, bright dip gold
10041067-105-002	TOP FRAME 3 PNL 59" NICKEL 4106712CTS	6463	41067	1.4986	0.3125	1.27	Precision cut	Mechanical polish, bright dip nickel
10041067-128-002	TOP FRAME 3 PNL 59" SPTW 41067CTS	6463	41067	1.4986	0.3125	1.27	Precision cut	Powder coat white
10041084-001-010	T/B FRAME 22 1/4" WHT	6463	41084	0.5652	0.3333	1.143	Precision cut	Powder coat white
10041084-001-603	T/B FRAME 66" WHT 41084CTS	6463	41084	1.6764	0.3333	1.143	Precision cut	Powder coat white
10041084-084-004	T/BOTTOM FRAME 66" SILVER	6463	41084	1.6764	0.3333	1.143	Precision cut	Mechanical polish, bright dip chrome
10041084-084-010	T/B FRAME 22 1/4" SILVER	6463	41084	0.5652	0.3333	1.143	Precision cut	Mechanical polish, bright dip chrome
10041112-084-002	BTM TRACK OPU/STORM 60" SIL 4111211	6463	41112	1.5240	0.4822	1.27	Precision cut	Mechanical polish, bright dip chrome
10041112-105-002	BTM TRACK OPU/STORM 60" NICKEL 4111211	6463	41112	1.5240	0.4822	1.27	Precision cut	Mechanical polish, bright dip nickel
10041152-001-010	S/M FRAME 67 3/4" WHITE	6463	41152	1.7209	0.1146	1.27	Precision cut, punched	Powder coat white
10041152-084-010	S/M FRAME 67 3/4" SILVER	6463	41152	1.7209	0.1146	1.27	Precision cut, punched	Mechanical polish, bright dip chrome

Part Number	Description	Alloy	Die Number	Length (m)	Density (kg/m)	Wall Thickness (mm)	Fabrication	Finish
10041186-128-001	HEADER 3-PNL 60" SPTW (k)	6463	41186	1.5240	1.2828	1.651	Precision cut	Powder coat white
10041187-084-001	HEADER 2-PANEL 60" SIL (k)	6463	41187	1.5240	0.8959	1.778	Precision cut	Mechanical polish, bright dip chrome
10041232-001-010	SIDE FRAME 52 15/16" SLOT WHT	6463	41232	1.3446	0.2054	1.27	Precision cut, punch, punched notch	Powder coat white
10041232-001-011	SIDE FRAME 62 5/8" SLOT WHT	6463	41232	1.5907	0.2054	1.27	Precision cut, punch, punched notch	Powder coat white
10041232-001-013	SIDE FRAME 65 7/8 WHT	6463	41232	1.6732	0.2054	1.27	Precision cut, punch, punched notch	Powder coat white
10041232-001-014	SIDE FRAME 67 3/4 SLOT WHT	6463	41232	1.7209	0.2054	1.27	Precision cut, punch, punched notch	Powder coat white
10041232-001-611	(P) SIDE FRAME 65 7/8 SLOT WHT	6463	41232	1.6732	0.2054	1.27	Precision cut, punch, punched notch	Powder coat white
10041232-084-010	SIDE FRAME 52 15/16" SLOT SIL	6463	41232	1.3446	0.2054	1.27	Precision cut, punch, punched notch	Mechanical polish, bright dip chrome
10041232-084-011	SIDE FRAME 62 5/8" SLOT SIL	6463	41232	1.5907	0.2054	1.27	Precision cut, punch, punched notch	Mechanical polish, bright dip chrome
10041232-084-012	SIDE FRAME 52 15/16" SIL	6463	41232	1.3446	0.2054	1.27	Precision cut, punch, punched notch	Mechanical polish, bright dip chrome
10041232-084-013	SIDE FRAME 65 7/8 SIL	6463	41232	1.6732	0.2054	1.27	Precision cut, punch, punched notch	Mechanical polish, bright dip chrome
10041232-084-014	SIDE FRAME 67 3/4 SLOT SIL	6463	41232	1.7209	0.2054	1.27	Precision cut, punch, punched notch	Mechanical polish, bright dip chrome
10041232-084-611	(P) SIDE FRAME 65 7/8 SLOT SIL	6463	41232	1.6732	0.2054	1.27	Precision cut, punch, punched notch	Mechanical polish, bright dip chrome
10041232-084-614	(P) SIDE FRAME 62 5/8 SIL	6463	41232	1.5907	0.2054	1.27	Precision cut, punch, punched notch	Mechanical polish, bright dip chrome
10041232-085-011	SIDE FRAME 62 5/8" SLOT GLD	6463	41232	1.5907	0.2054	1.27	Precision cut, punch, punched notch	Mechanical polish, bright dip gold
10041232-085-611	(P) SIDE FRAME 65 7/8 SLOT GLD	6463	41232	1.6732	0.2054	1.27	Precision cut, punch, punched notch	Mechanical polish, bright dip gold
10041232-105-010	SIDE FRAME 52 15/16" SLOT NIC	6463	41232	1.3446	0.2054	1.27	Precision cut, punch, punched notch	Mechanical polish, bright dip nickel
10041232-105-011	SIDE FRAME 62 5/8 SLOT NIC	6463	41232	1.5907	0.2054	1.27	Precision cut, punch, punched notch	Mechanical polish, bright dip nickel
10041232-105-014	SIDE FRAME 67 3/4" SLOT NIC	6463	41232	1.7209	0.2054	1.27	Precision cut, punch, punched notch	Mechanical polish, bright dip nickel
10041232-105-611	SIDE FRAME 65 7/8" SLOT NIC	6463	41232	1.6732	0.2054	1.27	Precision cut, punch, punched notch	Mechanical polish, bright dip nickel

Part Number	Description	Alloy	Die Number	Length (m)	Density (kg/m)	Wall Thickness (mm)	Fabrication	Finish
10041233-001-602	(P) MID FRAME 62 5/8 WHT	6463	41233	1.5907	0.2396	1.27	Precision cut, punch, punched notch	Powder coat white
10041233-001-603	(P) MID FRAME 67 3/4 WHT	6463	41233	1.7209	0.2396	1.27	Precision cut, punch, punched notch	Powder coat white
10041233-001-606	MID FRAME 52 15/16 WHT	6463	41233	1.3446	0.2396	1.27	Precision cut, punch, punched notch	Powder coat white
10041233-084-602	(P) MID FRAME 62 5/8 SIL	6463	41233	1.5907	0.2396	1.27	Precision cut, punch, punched notch	Mechanical polish, bright dip chrome
10041233-084-603	(P) MID FRAME 67 3/4 SIL	6463	41233	1.7209	0.2396	1.27	Precision cut, punch, punched notch	Mechanical polish, bright dip chrome
10041233-084-604	(P) MID FRAME 65 7/8 SIL	6463	41233	1.6732	0.2396	1.27	Precision cut, punch, punched notch	Mechanical polish, bright dip chrome
10041233-084-606	MID FRAME 52 15/16 SIL	6463	41233	1.3446	0.2396	1.27	Precision cut, punch, punched notch	Mechanical polish, bright dip chrome
10041233-085-603	(P) MID FRAME 67 3/4 GLD	6463	41233	1.7209	0.2396	1.27	Precision cut, punch, punched notch	Mechanical polish, bright dip gold
10041233-105-603	(P) MID FRAME 67 3/4 NIC	6463	41233	1.7209	0.2396	1.27	Precision cut, punch, punched notch	Mechanical polish, bright dip nickel
10041233-105-606	MID FRAME 52 15/16" NICKEL	6463	41233	1.3446	0.2396	1.27	Precision cut, punch, punched notch	Mechanical polish, bright dip nickel
10041235-128-004	TOWEL BAR 54" SPTW 41235CTS (K)	6463	41235	1.3716	0.3765	1.27	Precision cut	Powder coat white
10041252-084-001	SIDE FRAME 73 5/8" SIL	6463	41252	1.8701	0.1310	1.143	Precision cut, punch, punched notch	Mechanical polish, bright dip chrome
10041252-085-001	SIDE FRAME 73 5/8" GLD	6463	41252	1.8701	0.1310	1.143	Precision cut, punch, punched notch	Mechanical polish, bright dip gold
10041276-001-010	PIVOT JAMB 64 3/8" WHITE (K)	6463	41276	1.6351	0.4078	1.778	Precision cut, punched notch	Powder coat white
10041276-084-010	PIVOT JAMB 64 3/8" SILVER (K)	6463	41276	1.6351	0.4078	1.778	Precision cut, punched	Mechanical polish, bright dip chrome
10041285-001-010	T/B FRAME 13 3/4" WHT	6463	41285	0.3493	0.2173	1.143	Precision cut, punched	Powder coat white
10041285-001-011	T/B FRAME 15 1/2" WHT	6463	41285	0.3937	0.2173	1.143	Precision cut, punched	Powder coat white
10041285-001-012	T/B FRAME 12 5/16" WHT	6463	41285	0.3127	0.2173	1.143	Precision cut, punched	Powder coat white
10041285-084-010	T/B FRAME 13 3/4" SILVER	6463	41285	0.3493	0.2173	1.143	Precision cut, punched	Mechanical polish, bright dip chrome
10041285-084-011	T/B FRAME 15 1/2" SILVER	6463	41285	0.3937	0.2173	1.143	Precision cut, punched	Mechanical polish, bright dip chrome
10041285-084-012	T/B FRAME 12 5/16" SILVER	6463	41285	0.3127	0.2173	1.143	Precision cut, punched	Mechanical polish, bright dip chrome

Part Number	Description	Alloy	Die Number	Length (m)	Density (kg/m)	Wall Thickness (mm)	Fabrication	Finish
10041285-084-013	T/B FRAME 16 15/16" SILVER	6463	41285	0.4302	0.2173	1.143	Precision cut, punched	Mechanical polish, bright dip chrome
10041285-084-014	T/B FRAME 11" SILVER	6463	41285	0.2794	0.2173	1.143	Precision cut, punched	Mechanical polish, bright dip chrome
10041285-085-014	T/B FRAME 11" GOLD	6463	41285	0.2794	0.2173	1.143	Precision cut, punched	Mechanical polish, bright dip gold
10041285-105-003	T/B FRAME 52" NIC	6463	41285	1.3208	0.2173	1.143	Precision cut, punched	Mechanical polish, bright dip nickel
10041285-105-612	(P) T/B FRAME 12 5/16 NIC	6463	41285	0.3127	0.2173	1.143	Precision cut, punched	Mechanical polish, bright dip nickel
10041286-001-010	BTM TRACK 48 7/8" WHITE	6463	41286	1.2414	0.5372	1.778	Precision cut, drilled, bent	Powder coat white
10041286-001-012	BTM TRACK 54 13/16" WHITE	6463	41286	1.3922	0.5372	1.778	Precision cut, drilled, bent	Powder coat white
10041286-001-013	BTM TRACK 62 1/2" WHITE	6463	41286	1.5875	0.5372	1.778	Precision cut, drilled, bent	Powder coat white
10041286-001-014	BTM TRACK 54" WHITE	6463	41286	1.3716	0.5372	1.778	Precision cut, drilled, bent	Powder coat white
10041286-001-015	BTM TRACK 57 1/2" WHITE	6463	41286	1.4605	0.5372	1.778	Precision cut, drilled, bent	Powder coat white
10041286-001-016	BTM TRACK 60 3/16" WHITE	6463	41286	1.5288	0.5372	1.778	Precision cut, drilled, bent	Powder coat white
10041286-084-010	BTM TRACK 48 7/8" SILVER	6463	41286	1.2414	0.5372	1.778	Precision cut, drilled, bent	Mechanical polish, bright dip chrome
10041286-084-012	BTM TRACK 54 13/16" SILVER	6463	41286	1.3922	0.5372	1.778	Precision cut, drilled, bent	Mechanical polish, bright dip chrome
10041286-084-013	BTM TRACK 62 1/2" SILVER	6463	41286	1.5875	0.5372	1.778	Precision cut, drilled, bent	Mechanical polish, bright dip chrome
10041286-084-014	BTM TRACK 54" SILVER	6463	41286	1.3716	0.5372	1.778	Precision cut, drilled, bent	Mechanical polish, bright dip chrome
10041286-084-015	BTM TRACK 57 1/2" SILVER	6463	41286	1.4605	0.5372	1.778	Precision cut, drilled, bent	Mechanical polish, bright dip chrome
10041286-084-016	BTM TRACK 60 3/16" SILVER	6463	41286	1.5288	0.5372	1.778	Precision cut, drilled, bent	Mechanical polish, bright dip chrome
10041286-105-005	BTM TRACK 68" NICKEL	6463	41286	1.7272	0.5372	1.778	Precision cut	Mechanical polish, bright dip nickel
10041286-105-605	(P) BENT BTM TRK 54 13/16 NIC61"	6463	41286	1.3922	0.5372	1.778	Precision cut, drilled, bent	Mechanical polish, bright dip nickel
10041286-105-617	(P) BENT BTM TRK 62 1/2 NIC68"	6463	41286	1.5875	0.5372	1.778	Precision cut, drilled, bent	Mechanical polish, bright dip nickel
10041286-105-625	(P) BENT BTM TRK 48 7/8 NIC61"	6463	41286	1.2414	0.5372	1.778	Precision cut, drilled, bent	Mechanical polish, bright dip nickel
10041287-001-010	TOP TRACK 48 7/8" WHITE	6463	41287	1.2414	0.5357	1.143	Precision cut, drilled, bent	Powder coat white

Part Number	Description	Alloy	Die Number	Length (m)	Density (kg/m)	Wall Thickness (mm)	Fabrication	Finish
10041287-001-012	TOP TRACK 54 13/16" WHITE	6463	41287	1.3922	0.5357	1.143	Precision cut, drilled, bent	Powder coat white
10041287-001-014	TOP TRACK 54" WHITE	6463	41287	1.3716	0.5357	1.143	Precision cut, drilled, bent	Powder coat white
10041287-001-015	TOP TRACK 57 1/2" WHITE	6463	41287	1.4605	0.5357	1.143	Precision cut, drilled, bent	Powder coat white
10041287-001-016	TOP TRACK 60 3/16" WHITE	6463	41287	1.5288	0.5357	1.143	Precision cut, drilled, bent	Powder coat white
10041287-084-010	TOP TRACK 48 7/8" SILVER	6463	41287	1.2414	0.5357	1.143	Precision cut, drilled, bent	Mechanical polish, bright dip chrome
10041287-084-012	TOP TRACK 54 13/16" SILVER	6463	41287	1.3922	0.5357	1.143	Precision cut, drilled, bent	Mechanical polish, bright dip chrome
10041287-084-013	TOP TRACK 62 1/2" SILVER	6463	41287	1.5875	0.5357	1.143	Precision cut, drilled, bent	Mechanical polish, bright dip chrome
10041287-084-014	TOP TRACK 54" SILVER	6463	41287	1.3716	0.5357	1.143	Precision cut, drilled, bent	Mechanical polish, bright dip chrome
10041287-084-015	TOP TRACK 57 1/2" SILVER	6463	41287	1.4605	0.5357	1.143	Precision cut, drilled, bent	Mechanical polish, bright dip chrome
10041287-084-016	TOP TRACK 60 3/16" SILVER	6463	41287	1.5288	0.5357	1.143	Precision cut, drilled, bent	Mechanical polish, bright dip chrome
10041287-084-017	TOP TRACK 65 7/8" SILVER	6463	41287	1.6732	0.5357	1.143	Precision cut, drilled, bent	Mechanical polish, bright dip chrome
10041287-105-605	(P) BENT TOP TRK 54 13/16 NIC	6463	41287	1.3922	0.5357	1.143	Precision cut, drilled, bent	Mechanical polish, bright dip nickel
10041287-105-617	(P) BENT TOP TRK 62 1/2 NIC	6463	41287	1.5875	0.5357	1.143	Precision cut, drilled, bent	Mechanical polish, bright dip nickel
10041287-105-625	(P) BENT TOP TRK 48 7/8 NIC	6463	41287	1.2414	0.5357	1.143	Precision cut, drilled, bent	Mechanical polish, bright dip nickel
10041288-001-010	PULL FRAME 67 3/4" LFT WHT	6463	41288	1.7209	0.2470	1.143	Precision cut, punched notch, countersink	Powder coat white
10041288-001-011	PULL FRAME 67 3/4" RGT WHT	6463	41288	1.7209	0.2470	1.143	Precision cut, punched notch, countersink	Powder coat white
10041288-001-012	PULL FRAME 68" LFT WHT	6463	41288	1.7272	0.2470	1.143	Precision cut, punched notch, countersink	Powder coat white
10041288-001-013	PULL FRAME 68" RGT WHT	6463	41288	1.7272	0.2470	1.143	Precision cut, punched notch, countersink	Powder coat white
10041288-084-010	PULL FRAME 67 3/4" LFT SIL	6463	41288	1.7209	0.2470	1.143	Precision cut, punched notch, countersink	Mechanical polish, bright dip chrome
10041288-084-011	PULL FRAME 67 3/4" RGT SIL	6463	41288	1.7209	0.2470	1.143	Precision cut, punched notch, countersink	Mechanical polish, bright dip chrome
10041288-084-012	PULL FRAME 68" LFT SIL	6463	41288	1.7272	0.2470	1.143	Precision cut, punched notch, countersink	Mechanical polish, bright dip chrome



Part Number	Description	Alloy	Die Number	Length (m)	Density (kg/m)	Wall Thickness (mm)	Fabrication	Finish
10041288-084-013	PULL FRAME 68" RGT SIL	6463	41288	1.7272	0.2470	1.143	Precision cut, punched notch, countersink	Mechanical polish, bright dip chrome
10041288-085-013	PULL FRAME 68" RGT GLD	6463	41288	1.7272	0.2470	1.143	Precision cut, punched notch, countersink	Mechanical polish, bright dip gold
10041288-105-012	PULL FRAME 68" LFT NIC	6463	41288	1.7272	0.2470	1.143	Precision cut, punched notch, countersink	Mechanical polish, bright dip nickel
10041288-105-013	PULL FRAME 68" RGT NIC	6463	41288	1.7272	0.2470	1.143	Precision cut, punched notch, countersink	Mechanical polish, bright dip nickel
10041289-001-010	SIDE FRAME 68" WHT	6463	41289	1.7272	0.1280	1.143	Precision cut, punched notch, countersink	Powder coat white
10041289-084-010	SIDE FRAME 68" SILVER	6463	41289	1.7272	0.1280	1.143	Precision cut, punched notch, countersink	Mechanical polish, bright dip chrome
10041289-085-010	SIDE FRAME 68" GLD	6463	41289	1.7272	0.1280	1.143	Precision cut, punched notch, countersink	Mechanical polish, bright dip gold
10041289-105-010	SIDE FRAME 68" NIC	6463	41289	1.7272	0.1280	1.143	Precision cut, punched notch, countersink	Mechanical polish, bright dip nickel
10041290-001-011	DOUBLE ROLLER 5" L/R WHT	6463	41290	0.1270	0.2426	1.143	Precision cut, punched notch, countersink	Powder coat white
10041290-001-012	TOP ROLLER SUPPORT 5" RGT WHT	6463	41290	0.1270	0.2426	1.143	Precision cut, punched notch, countersink	Powder coat white
10041290-001-015	ROLLER SUPPORT 5 13/16" CTR WHT	6463	41290	0.1476	0.2426	1.143	Precision cut, punched notch, countersink	Powder coat white
10041290-001-019	T/B FRAME 11 3/4 CTR WHT	6463	41290	0.2985	0.2426	1.143	Precision cut, punched notch, countersink	Powder coat white
10041290-084-010	TOP ROLLER SUPPORT 5" LFT SIL	6463	41290	0.1270	0.2426	1.143	Precision cut, punched notch, countersink	Mechanical polish, bright dip chrome
10041290-084-011	DOUBLE ROLLER 5" L/R SIL	6463	41290	0.1270	0.2426	1.143	Precision cut, punched notch, countersink	Mechanical polish, bright dip chrome
10041290-084-012	TOP ROLLER SUPPORT 5" RGT SIL	6463	41290	0.1270	0.2426	1.143	Precision cut, punched notch, countersink	Mechanical polish, bright dip chrome
10041290-084-013	ROLLER SUPPORT 5 13/16" RGT SIL	6463	41290	0.1476	0.2426	1.143	Precision cut, punched notch, countersink	Mechanical polish, bright dip chrome
10041290-084-014	ROLLER SUPPORT 5 13/16" LFT SIL	6463	41290	0.1476	0.2426	1.143	Precision cut, punched notch, countersink	Mechanical polish, bright dip chrome
10041290-084-015	ROLLER SUPPRT 5 13/16" CTR SIL	6463	41290	0.1476	0.2426	1.143	Precision cut, punched notch, countersink	Mechanical polish, bright dip chrome
10041290-084-017	DOUBLE ROLLER 7" CTR SIL	6463	41290	0.1778	0.2426	1.143	Precision cut, punched notch, countersink	Mechanical polish, bright dip chrome
10041290-084-019	T/B FRAME 11 3/4 CTR SIL	6463	41290	0.2985	0.2426	1.143	Precision cut, punched notch, countersink	Mechanical polish, bright dip chrome

Part Number	Description	Alloy	Die Number	Length (m)	Density (kg/m)	Wall Thickness (mm)	Fabrication	Finish
10041290-105-601	(P) TOP ROLLER SUPP 5 13/16 LFT NIC	6463	41290	0.1476	0.2426	1.143	Precision cut, punched notch, countersink	Mechanical polish, bright dip nickel
10041290-105-602	(P) TOP ROLLER SUPP 5 13/16 L/R NIC	6463	41290	0.1476	0.2426	1.143	Precision cut, punched notch, countersink	Mechanical polish, bright dip nickel
10041290-105-603	(P) TOP ROLLER SUPP 5 13/16 RGT NIC	6463	41290	0.1476	0.2426	1.143	Precision cut, punched notch, countersink	Mechanical polish, bright dip nickel
10041291-001-010	WALL JAMB 69 5/8" WHT	6463	41291	1.7685	0.3259	1.143	Precision cut, punched	Powder coat white
10041291-084-010	WALL JAMB 69 5/8" SILVER	6463	41291	1.7685	0.3259	1.143	Precision cut, punched	Mechanical polish, bright dip chrome
10041291-085-010	WALL JAMB 69 5/8" GOLD	6463	41291	1.7685	0.3259	1.143	Precision cut, punched	Mechanical polish, bright dip gold
10041291-105-605	(P) WLL JAMB 69 5/8 NIC	6463	41291	1.7685	0.3259	1.143	Precision cut, punched	Mechanical polish, bright dip nickel
10041292-001-010	EXP JAMB 69 5/16" WHT	6463	41292	1.7605	0.3095	1.143	Precision cut, punched	Powder coat white
10041292-084-010	EXP JAMB 69 5/16" SILVER	6463	41292	1.7605	0.3095	1.143	Precision cut, punched	Mechanical polish, bright dip chrome
10041292-085-010	EXP JAMB 69 5/16" GOLD	6463	41292	1.7605	0.3095	1.143	Precision cut, punched	Mechanical polish, bright dip gold
10041292-105-602	(P) EXP JAMB 69 5/16 NIC	6463	41292	1.7605	0.3095	1.143	Precision cut, punched	Mechanical polish, bright dip nickel
10041312-001-601	(P) WLL JAMB 64 3/8 WHT	6463	41312	1.6351	0.4792	1.27	Precision cut, punched	Powder coat white
10041312-084-601	(P) WALL JAMB 64"3/8 SIL	6463	41312	1.6351	0.4792	1.27	Precision cut, punched	Mechanical polish, bright dip chrome
10041312-085-601	(P) WLL JAMB 64 3/8 GLD	6463	41312	1.6351	0.4792	1.27	Precision cut, punched	Mechanical polish, bright dip gold
10041314-001-601	(P) PIVOT SUPP 4 3/4 LFT WHT	6463	41314	0.1207	0.7054	1.27	Precision cut, punched	Powder coat white
10041314-001-602	(P) PIVOT SUPP 4 3/4 RGT WHT	6463	41314	0.1207	0.7054	1.27	Precision cut, punched	Powder coat white
10041314-084-002	T/B FRAME 60" SIL 413141101	6463	41314	1.5240	0.7054	1.27	Precision cut, punched	Mechanical polish, bright dip chrome
10041314-085-002	TOP/BOT, FRAME 60" GLD CTS	6463	41314	1.5240	0.7054	1.27	Precision cut, punched	Mechanical polish, bright dip gold
10041358-084-001	HINGE INNER PLATE SIL	6463	41358	0.0450	2.5039	1.5748	Precision cut, countersink, taped	Mechanical polish, bright dip chrome
10041358-105-001	HINGE INNER PLATE NIC	6463	41358	0.0450	2.5016	1.5748	Precision cut, countersink	Mechanical polish, bright dip nickel
10041369-001-010	SILL 37" WHT (k)	6463	41369	0.9398	0.2411	1.8542	Precision cut	Powder coat white
10041369-084-010	SILL 37" SIL (k)	6463	41369	0.9398	0.2411	1.8542	Precision cut	Mechanical polish, bright dip chrome

Part Number	Description	Alloy	Die Number	Length (m)	Density (kg/m)	Wall Thickness (mm)	Fabrication	Finish
10041369-105-010	SILL 37" SIL NIC (K)	6463	41369	2.9210	0.2411	1.8542	Precision cut	Mechanical polish, bright dip nickel
10047568-084-603	PNL UPR SIL 71" 469-CH02	6463	KSD469	1.8034	0.4028	1.27	Precision cut, punched	Mechanical polish, bright dip chrome
10075379-084	HDR 331 SIL 33 KSD472-CH	6463	KSD472	0.8382	0.5720	1.524	Precision cut	Mechanical polish, bright dip chrome
10081206-001-004	LT BOX WHT 28-15/16 ±1/32 KSD417-01	6463	KSD417	0.7350	1.3063	1.651	Precision cut, punched, punched notch, drilled, bent, countersink	Powder coat white
10081219-084-004	BOTTOM STRIP 27 1/16 CHR	6463	KSD424	0.6874	0.1281	1.27	Precision cut	Mechanical polish, bright dip chrome
10081219-171-004	BOTTOM STRIP 27 1/16 SN	6463	KSD424	0.6874	0.1281	1.27	Precision cut	Mechanical polish, bright dip nickel
10081229-001-001	SIDE WHT 24-1/4 ±1/32 KSD430-02	6463	KSD430	0.6160	0.5020	1.3208	Precision cut, punched, punched notch, drilled, bent, countersink	Powder coat white
10081238-001-003	BOX-X WHT 13-11/16 ±1/32 KSD802-02	6463	KSD802	0.3477	0.7060	1.5748	Precision cut, punched, punched notch, drilled, bent, countersink	Powder coat white
10081238-001-007	BOX-X WHT 22-11/16 ±1/32 KSD802-04	6463	KSD802	0.5763	0.7060	1.5748	Precision cut, punched, punched notch, drilled, bent, countersink	Powder coat white
10081238-001-008	BOX-X WHT 27-5/8 ±1/32 KSD802-07	6463	KSD802	0.7017	0.7060	1.5748	Precision cut, punched, punched notch, drilled, bent, countersink	Powder coat white
10081238-001-011	BOX-X WHT 34-3/4 ±1/32 KSD802-06	6463	KSD802	0.8827	0.7060	1.5748	Precision cut, punched, punched notch, drilled, bent, countersink	Powder coat white
10081238-001-019	BOX-X WHT 12-3/4+/-1/32 KSD802-11	6463	KSD802	0.3239	0.7060	1.5748	Precision cut, punched, punched notch, drilled, bent, countersink	Powder coat white
10081238-001-022	BOX-X WHT 99 ±1/8 KSD802-16	6463	KSD802	2.5146	0.7060	1.5748	Precision cut, punched, punched notch, drilled, bent, countersink	Powder coat white
10081238-015-002	BOX-X PPG90212 BLK 18-1/4±1/32 KSD802-37	6463	KSD802	0.4636	0.7060	1.5748	Precision cut, punched, punched notch, drilled, bent, countersink	Powder coat black

Part Number	Description	Alloy	Die Number	Length (m)	Density (kg/m)	Wall Thickness (mm)	Fabrication	Finish
10081240-001-003	BOX UPR WHT 30 ±1/32 KSD803-03	6463	KSD803	0.7620	0.6598	1.3208	Precision cut, punched, punched notch, drilled, bent, countersink	Powder coat white
10081240-001-007	BOX UPR WHT 108 ±1/8 KSD803-05	6463	KSD803	2.7432	0.6598	1.3208	Precision cut, punched, punched notch, drilled, bent, countersink	Powder coat white
10081292-001-007	CTR SUP WHT 108 ±1/8 KSD804-05	6463	KSD804	2.7432	1.3614	1.27	Precision cut, punched, punched notch, drilled, bent, countersink	Powder coat white
10081298-015-001	BX UP PPG90212BK 25-13/16±1/32 KSD805-08	6463	KSD805	0.6556	0.6181	1.5748	Precision cut, punched, punched notch, drilled, bent, countersink	Powder coat black
20000110-003	ALUMINUM - PLC01 67,62" WH	6463	PLC01	1.7175	0.3839	1.27	Precision cut	Powder coat white
20000112-003	ALUMINUM - PLC03 67,62" WH	6463	PLC03	1.7175	0.6072	1.27	Precision cut	Powder coat white
20000114-003	WALL JAMB PNA01 71,74" WH	6463	PNA01	1.8222	0.3125	1.27	Precision cut, punched	Powder coat white
20000115-003	PULL FRAME PNA02R2 69,20 " WH	6463	PNA02R2	1.7577	0.6667	1.143	Precision cut	Powder coat white
20000123-003	CORNER POST PNAK01 71,74 " WH	6463	PNAK01	1.8222	0.5298	1.27	Precision cut	Powder coat white
20000123-084	CORNER POST PNAK01 71,74 " CHR	6463	PNAK01	1.8222	0.5298	1.27	Precision cut	Mechanical polish, bright dip chrome
20000124-003	CORNER POST STRICKER PNAK02 71,74" WHT	6463	PNAK02	1.8222	0.6027	1.27	Precision cut	Powder coat white
20000124-084	CORNER POST STRICKER PNAK02 71,74" CHR	6463	PNAK02	1.8222	0.6027	1.27	Precision cut	Mechanical polish, bright dip chrome
20000125-003	TOP/BOTTOM FRAME PNAK03 66" WHT	6463	PNAK03	1.6764	0.3973	1.27	Precision cut	Powder coat white
20000125-084	TOP/BOTTOM FRAME PNAK03 66" CHR	6463	PNAK03	1.6764	0.3973	1.27	Precision cut	Mechanical polish, bright dip chrome
20000126-003	EXP, WALL JAMB PNAK05 71,74" WHT	6463	PNAK05	1.8222	0.4241	1.27	Precision cut	Powder coat white
20000126-084	EXP, WALL JAMB PNAK05 71,74" CHR	6463	PNAK05	1.8222	0.4241	1.27	Precision cut	Mechanical polish, bright dip chrome
20000127-084	ALUMINUM - PNAK06 71" CHR	6463	PNAK06	1.8034	0.5789	1.27	Precision cut	Mechanical polish, bright dip chrome
20000128-003	PULL FRAME PNAK07 69,01" WHT	6463	PNAK07	1.7529	0.4851	1.27	Precision cut	Powder coat white
20000128-084	PULL FRAME PNAK07 69,01" CHR	6463	PNAK07	1.7529	0.4851	1.27	Precision cut	Mechanical polish, bright dip chrome
20000129-084	SIDE FRAME PNAK08 69,01" CHR	6463	PNAK08	1.7529	0.2902	1.27	Precision cut	Mechanical polish, bright dip chrome

Part Number	Description	Alloy	Die Number	Length (m)	Density (kg/m)	Wall Thickness (mm)	Fabrication	Finish
20000130-084	ALUMINUM - PNAK09 65" CHR	6463	PNAK09	1.6510	0.3453	1.27	Precision cut	Mechanical polish, bright dip chrome
20000135-003	ALUMINUM - PR03R1 71.74" WH	6463	PR03R1	1.8222	0.4494	1.27	Precision cut	Powder coat white
20000137-003	ALUMINUM - PR05 68,41" WH	6463	PR05	1.7376	0.2932	1.143	Precision cut	Powder coat white
20000138-003	ALUMINUM - PR06R1 71,74" WH	6463	PR06R1	1.8222	0.4301	1.27	Precision cut	Powder coat white
20000139-003	ALUMINUM - PR08 69,20" WH	6463	PR08	1.7577	0.2560	1.27	Precision cut	Powder coat white
20000143-003	ALUMINUM - PR3601 71,74" WH	6463	PR3601	1.8222	0.3676	1.27	Precision cut	Powder coat white
20004480-084	PULL FRAME PNA02R2 69,20 " CH	6463	PNA02R2	1.7577	0.6667	1.143	Precision cut	Mechanical polish, bright dip chrome
20004480-085	PULL FRAME PNA02R2 69,20 " PB	6463	PNA02R2	1.7577	0.6667	1.143	Precision cut	Mechanical polish, bright dip gold
20004480-105	PULL FRAME PNA02R2 69,20 " BN	6463	PNA02R2	1.7577	0.6667	1.143	Precision cut	Mechanical polish, bright dip nickel
20004485-084	ALUMINUM - PR02 54,922" CH	6463	PR02	1.3950	0.3988	1.143	Precision cut, bent	Mechanical polish, bright dip chrome
20004485-105	ALUMINUM - PR02 54,922" BN	6463	PR02	1.3950	0.3988	1.143	Precision cut, bent	Mechanical polish, bright dip nickel
20004489-084	ALUMINUM - PR04 69,75" CH	6463	PR04	1.7717	0.2842	1.27	Precision cut	Mechanical polish, bright dip chrome
20004489-085	ALUMINUM - PR04 69,75" PB	6463	PR04	1.7717	0.2842	1.27	Precision cut	Mechanical polish, bright dip gold
20004489-105	ALUMINUM - PR04 69,75" BN	6463	PR04	1.7717	0.2842	1.27	Precision cut	Mechanical polish, bright dip nickel
20004490-084	ALUMINUM - PR05 68,41" CH	6463	PR05	1.7376	0.2932	1.143	Precision cut	Mechanical polish, bright dip chrome
20004490-085	ALUMINUM - PR05 68,41" PB	6463	PR05	1.7376	0.2932	1.143	Precision cut	Mechanical polish, bright dip gold
20004490-105	ALUMINUM - PR05 68,41" BN	6463	PR05	1.7376	0.2932	1.143	Precision cut	Mechanical polish, bright dip nickel
20004493-084	ALUMINUM - PR09 69,75" CH	6463	PR09	1.7717	0.3542	1.27	Precision cut	Mechanical polish, bright dip chrome
20004493-085	ALUMINUM - PR09 69,75" PB	6463	PR09	1.7717	0.3542	1.27	Precision cut	Mechanical polish, bright dip gold
20004493-105	ALUMINUM - PR09 69,75" BN	6463	PR09	1.7717	0.3542	1.27	Precision cut	Mechanical polish, bright dip nickel
20004494-084	ALUMINUM - PR10 CH 82"	6463	PR10	2.0828	0.3899	1.143	Precision cut, bent	Mechanical polish, bright dip chrome

<b>Part Number</b>	<b>Description</b>	<b>Alloy</b>	<b>Die Number</b>	<b>Length (m)</b>	<b>Density (kg/m)</b>	<b>Wall Thickness (mm)</b>	<b>Fabrication</b>	<b>Finish</b>
20004494-105	ALUMINUM - PR10 PB 82" BN	6463	PR10	2.0828	0.3899	1.143	Precision cut, bent	Mechanical polish, bright dip nickel

Place of Hearing: Ottawa, Ontario  
Date of Hearing: November 5, 2019

Tribunal Panel: Georges Bujold, Presiding Member  
Serge Fréchette, Member  
Randolph W. Heggart, Member

Support Staff: Alain Xatruch, Lead Counsel  
Heidi Lee, Counsel  
Mark Howell, Lead Analyst  
Josée St-Amand, Analyst  
Andrew Wigmore, Analyst  
Thy Dao, Analyst  
Julie Charlebois, Data Services Advisor

**PARTICIPANTS:****Domestic Producers**

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Apel Extrusions Limited  
Apex Aluminum Extrusions Ltd.  
Can Art Aluminum Extrusion LP  
Dajcor Aluminum Ltd.  
Extrudex Aluminum Corp.  
Hydro Extrusion Canada, Inc.  
Metra Aluminum Inc.  
Spectra Aluminum Products Ltd./Spectra  
Anodizing Inc.

**Other**

United Steelworkers

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## STATEMENT OF REASONS

### INTRODUCTION

[1] This is an expiry review, conducted pursuant to subsection 76.03(3) of the *Special Import Measures Act*,<sup>1</sup> of the order made by the Canadian International Trade Tribunal on March 17, 2014, in Expiry Review No. RR-2013-003, continuing, without amendment, its findings made on March 17, 2009, in Inquiry No. NQ-2008-003, as amended by its determination made on February 10, 2011, in Inquiry No. NQ-2008-003R, concerning the dumping and subsidizing of aluminum extrusions originating in or exported from the People's Republic of China (China) (the subject goods).<sup>2</sup>

[2] Under *SIMA*, findings of injury or threat of injury and the associated protection in the form of anti-dumping or countervailing duties expire five years from the date of the finding or, if one or more orders continuing the finding have been made, the date of the last order made under paragraph 76.03(12)(b), unless the Tribunal initiates an expiry review before that date. The order in Expiry Review No. RR-2013-003 was scheduled to expire on March 16, 2019.

[3] The Tribunal's mandate in this expiry review is to determine whether the expiry of the order is likely to result in injury to the domestic industry and then, accordingly, to make an order either continuing or rescinding the order, with or without amendment.

### PROCEDURAL BACKGROUND

[4] The Tribunal issued its notice of expiry review on March 8, 2019. This notice triggered the initiation of an investigation by the Canada Border Services Agency (CBSA) on March 11, 2019, to determine whether the expiry of the Tribunal's order was likely to result in the continuation or resumption of dumping and subsidizing of the subject goods.

[5] On August 2, 2019, the CBSA determined, pursuant to paragraph 76.03(7)(a) of *SIMA*, that the expiry of the order was likely to result in the continuation or resumption of dumping and subsidizing of the subject goods.<sup>3</sup>

[6] On August 6, 2019, following the CBSA's determination, the Tribunal began its expiry review to determine, pursuant to subsection 76.03(10) of *SIMA*, whether the expiry of the order was likely to result in injury to the domestic industry.

[7] The period of review (POR) for the Tribunal's expiry review covered three full calendar years, from January 1, 2016, to December 31, 2018, as well as the interim period of January 1 to June 30, 2019 (interim 2019). For comparative purposes, information was also collected and presented for the interim period of January 1 to June 30, 2018 (interim 2018).

[8] The Tribunal sent questionnaires to known domestic producers and importers of aluminum extrusions meeting the product definition, and to known foreign producers of the subject goods. The Tribunal received 14 replies to the domestic producers' questionnaire from companies stating that they produced aluminum extrusions meeting the product definition during the POR. The Tribunal

<sup>1</sup> R.S.C. 1985, c. S-15 [*SIMA*].

<sup>2</sup> The full product definition is set out in paragraph 13.

<sup>3</sup> Exhibit RR-2018-008-03, Vol. 1 at 5.



received 26 replies to the importers' questionnaire from companies that imported subject goods and/or aluminum extrusions meeting the product definition from non-subject countries during the POR. Finally, the Tribunal received two replies to the foreign producers' questionnaire from firms indicating that they did not produce the subject goods.

[9] Using the questionnaire responses and other information on the record, staff of the Canadian International Trade Tribunal Secretariat of the Administrative Tribunals Support Service of Canada prepared public and protected versions of three investigation reports—one containing general information and one each for custom-shaped and standard-shaped aluminum extrusions. The reports were placed on the record on September 30, 2019.

[10] Domestic producers Almag Aluminum Inc. (Almag), Apel Extrusions Limited (Apel), Apex Aluminum Extrusions Ltd. (Apex), Can Art Aluminum Extrusion LP (Can Art), Dajcor Aluminum Ltd. (Dajcor), Extrudex Aluminum Corp. (Extrudex), Hydro Extrusion Canada, Inc. (Hydro), Metra Aluminum Inc. (Metra) and Spectra Aluminum Products Ltd./Spectra Anodizing Inc. (Spectra) (collectively referred to as the Domestic Extruders) filed joint written submissions in support of a continuation of the order. The United Steelworkers (USW) filed evidence in the form of witness statements that were supportive of a continuation of the order. The Tribunal did not receive any submissions opposing the continuation of the order.<sup>4</sup>

[11] Given that there were no submissions opposing the continuation of the order, the Domestic Extruders requested that the Tribunal proceed by way of a file hearing in lieu of an oral hearing. Noting that there were no objections to proceeding by way of a file hearing and being satisfied that it was appropriate to do so in the circumstances, the Tribunal decided, pursuant to rule 25.1 of the *Canadian International Trade Tribunal Rules*,<sup>5</sup> to hold a hearing by way of written submissions, without the presence of the parties. That hearing was held on November 5, 2019.

[12] The Tribunal did not receive any requests for product exclusions.

## **PRODUCT**

### **Product Definition**

[13] The goods that are subject to this expiry review (i.e. the subject goods) are defined as aluminum extrusions produced via an extrusion process of alloys having metallic elements falling within the alloy designations published by The Aluminum Association commencing with 1, 2, 3, 5, 6 or 7 (or proprietary or other certifying body equivalents), with the finish being as extruded (mill), mechanical, anodized or painted or otherwise coated, whether or not worked, having a wall thickness greater than 0.5 mm, with a maximum weight per metre of 22 kg and a profile or cross-section which fits within a circle having a diameter of 254 mm, excluding the products described in the attached appendix, originating in or exported from China.

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<sup>4</sup> Polaron Solartech Corp. filed a notice of participation but did not file any submissions or requests for product exclusions. On October 10, 2019, it withdrew from the proceedings.

<sup>5</sup> SOR/91-499.

## Product Information<sup>6</sup>

[14] Aluminum extrusions are widely used in numerous market sectors. The main end-use sectors for aluminum extrusions are building and construction, transportation and engineered products. Uses for aluminum extrusions in the building and construction industry cover a wide range of products, including windows, doors, railings, bridges, light poles, high-rise curtain walls, framing members and other various structures. Uses for aluminum extrusions in the transportation industry include parts for automobiles, buses, trucks, trailers, rail cars, mass transit vehicles, recreational vehicles, aircraft and aerospace. Aluminum extrusions are also used in many consumer and commercial products, including air conditioners, appliances, furniture, lighting, sports equipment, electrical power units, heat sinks, machinery and equipment, food displays, refrigeration, medical equipment and laboratory equipment.

[15] All aluminum extrusions are produced as either hollow or solid profiles. Hollow profile extrusions generally cost more to produce and obtain higher prices than solid profile extrusions. Extrusions are often produced in standard shapes such as bars, rods, pipes and tubes, angles, channels and tees but they are also produced in customized shapes.

[16] In addition to “as extruded” or mill finish, extrusions can be finished mechanically by polishing, buffing or tumbling. Extrusions can have anodized finishes applied by means of an electro-chemical process that forms a durable, porous oxide film on the surface of the aluminum. Also, they can be finished with liquid or powder paint coatings utilizing an electrostatic application process.

[17] Working or fabricating extrusions includes any operation performed other than mechanical, anodized, painted or other finishing, prior to utilization of the extrusion in a finished product. These operations can include precision cutting, machining, punching and drilling.

[18] The extrusion process is described in detail in the Tribunal’s statement of reasons in Inquiry No. NQ-2008-003.<sup>7</sup> Both standard-shaped and custom-shaped aluminum extrusions are manufactured using the same equipment and according to a similar process. Generally, in the case of custom shapes, the customer will provide the chosen manufacturer with the specific design and specific desired characteristics. This often entails the use of custom-made dies, whereas standard shapes are made from generally available standard dies.<sup>8</sup> There is no evidence that this process has changed in material respects since the issuance of the Tribunal’s findings in Inquiry No. NQ-2008-003.

## PRELIMINARY MATTER

[19] As noted above, the Tribunal did not receive any submissions opposing the continuation of the order. In light of this fact, the Tribunal was particularly vigilant in its assessment of the information contained on the record in order to ensure that its determinations were based on positive, accurate evidence and involved an objective examination of all the factors that are relevant to the likelihood of an injury determination. In this respect, Tribunal staff conducted a rigorous review of all questionnaire replies to ensure that they were complete, that inconsistencies were addressed and

<sup>6</sup> Exhibit RR-2018-008-05.01, Vol. 1.1 at 4-5.

<sup>7</sup> *Aluminum Extrusions* (17 March 2009), NQ-2008-003 (CITT) [*Aluminum Extrusions Inquiry*] at paras. 25-32.

<sup>8</sup> *Aluminum Extrusions Inquiry* at paras. 117, 122.

errors corrected, that the data reconciled and were reasonable, and that any anomalies were explained. This approach is consistent with the Tribunal's past practice.<sup>9</sup>

## LEGAL FRAMEWORK

[20] The Tribunal is required, pursuant to subsection 76.03(10) of *SIMA*, to determine whether the expiry of the order in respect of the subject goods is likely to result in injury or retardation for the domestic industry.<sup>10</sup> Pursuant to subsection 76.03(12), if the Tribunal determines that the expiry of the order is unlikely to result in injury, it is required to rescind the order. However, if it determines that the expiry of the order is likely to result in injury, the Tribunal is required to continue the order, with or without amendment.

[21] Before proceeding with its analysis of the likelihood of injury, the Tribunal must first determine what domestically produced goods are "like goods" in relation to the subject goods and whether there is more than one class of goods. Once those determinations have been made, the Tribunal must determine what constitutes the "domestic industry".

[22] Given that this expiry review concerns both the dumping and subsidizing of the subject goods, the Tribunal must also determine whether it will make an assessment of the cumulative effect of this dumping and subsidizing on the domestic industry, i.e. whether it will cross-cumulate the effect.

## LIKE GOODS AND CLASSES OF GOODS

[23] In order for the Tribunal to determine whether the resumed or continued dumping and subsidizing of the subject goods is likely to cause material injury to the domestic producers of like goods, it must determine which domestically produced goods, if any, constitute like goods in relation to the subject goods. The Tribunal must also assess whether there is, within the subject goods and the like goods, more than one class of goods.<sup>11</sup>

[24] Subsection 2(1) of *SIMA* defines "like goods", in relation to any other goods, as follows:

- (a) goods that are identical in all respects to the other goods, or
- (b) in the absence of any goods described in paragraph (a), goods the uses and other characteristics of which closely resemble those of the other goods.

[25] In deciding the issue of like goods when goods are not identical in all respects to the other goods, the Tribunal typically considers a number of factors, including the physical characteristics of

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<sup>9</sup> See, for example, *Hot-rolled Carbon Steel Plate and High-strength Low-alloy Steel Plate* (31 October 2019), RR-2018-007 (CITT) at para. 21; *Hot-rolled Carbon Steel Plate and High-strength Low-alloy Steel Plate* (13 February 2015), RR-2014-002 (CITT) at para. 16.

<sup>10</sup> Subsection 2(1) of *SIMA* defines "injury" as "material injury to a domestic industry" and "retardation" as "material retardation of the *establishment* of a domestic industry" [emphasis added]. Given that there is currently an established domestic industry, the issue of whether the expiry of the order is likely to result in retardation does not arise in this expiry review.

<sup>11</sup> Should the Tribunal determine that there is more than one class of goods in this expiry review, it must conduct a separate likelihood of injury analysis and make a decision for each class that it identifies. See *Noury Chemical Corporation and Minerals & Chemicals Ltd. v. Pennwalt of Canada Ltd. and Anti-dumping Tribunal*, [1982] 2 F.C. 283 (FC).

the goods (such as composition and appearance) and their market characteristics (such as substitutability, pricing, distribution channels, end uses and whether the goods fulfill the same customer needs).<sup>12</sup> These same factors are also considered in deciding whether there is more than one class of goods.<sup>13</sup>

[26] In Inquiry No. NQ-2008-003, the Tribunal, upon consideration of the above factors, found that domestically produced aluminum extrusions, defined in the same manner as the subject goods, constitute like goods in relation to the subject goods.<sup>14</sup> The Tribunal was also of the view that the subject goods and, therefore, the like goods, include aluminum extrusion products that have been further processed, but only to a certain extent.<sup>15</sup> With regard to classes of goods, the Tribunal concluded that standard-shaped aluminum extrusions (comprised of bars and rods, pipes and tubes, angles, channels, beams and tees) and custom-shaped aluminum extrusions (comprised of all shapes that are not standard shapes) are not “like goods” in relation to each other and therefore constitute two separate classes of goods.<sup>16</sup> These conclusions were maintained in Expiry Review No. RR-2013-003.<sup>17</sup>

[27] There is no evidence in the present expiry review that would suggest that the above conclusions should be revisited. Accordingly, the Tribunal finds that domestically produced aluminum extrusions, defined in the same manner as the subject goods, constitute like goods in relation to the subject goods and that there are two separate classes of goods, namely, standard-shaped and custom-shaped aluminum extrusions. The Tribunal will therefore conduct a separate likelihood of injury analysis and make a decision for each of these two classes of goods.

## DOMESTIC INDUSTRY

[28] Subsection 2(1) of *SIMA* defines “domestic industry” as follows:

... the domestic producers as a whole of the like goods or those domestic producers whose collective production of the like goods constitutes a major proportion of the total domestic production of the like goods except that, where a domestic producer is related to an exporter or importer of dumped or subsidized goods, or is an importer of such goods, “domestic industry” may be interpreted as meaning the rest of those domestic producers.

[29] The Tribunal must therefore determine whether there is a likelihood of injury to the domestic producers as a whole or those domestic producers whose production represents a major proportion of

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<sup>12</sup> See, for example, *Copper Pipe Fittings* (19 February 2007), NQ-2006-002 (CITT) at para. 48.

<sup>13</sup> In order to decide whether there is more than one class of goods, the Tribunal must determine whether goods potentially included in separate classes of goods (or that have previously been included in separate classes of goods) constitute “like goods” in relation to each other. If they do, they will be regarded as comprising a single class of goods. See, for example, *Aluminum Extrusions Inquiry* at para. 115; *Fasteners* (7 January 2005), NQ-2004-005 (CITT) at para. 70.

<sup>14</sup> *Aluminum Extrusions Inquiry* at para. 90.

<sup>15</sup> *Aluminum Extrusions Inquiry* at paras. 95-98. The Tribunal noted that the wording of the definition and the contextual guidance provided by the additional product information make it clear that aluminum extrusion products that are not manufactured beyond the fabrication and finishing processes referred to in these descriptions, which include anodizing, painting or otherwise coating, precision cutting, machining, punching and drilling, are included in the scope of the like goods.

<sup>16</sup> *Aluminum Extrusions Inquiry* at paras. 126, 132.

<sup>17</sup> *Aluminum Extrusions* (17 March 2014), RR-2013-003 (CITT) [*Aluminum Extrusions Review*] at paras. 39, 45.

the total production of like goods.<sup>18</sup> In this expiry review, since the Tribunal has determined that there are two classes of goods, it must identify the domestic producers that constitute the domestic industry for each class of goods.

[30] The evidence indicates that there were 15 known Canadian producers of aluminum extrusion products during the POR. These are the nine domestic producers constituting the Domestic Extruders (i.e. Almag, Apel, Apex, Can Art, Dajcor, Extrudex, Hydro, Metra and Spectra) and six other producers, namely, Astrex Inc. (Astrom), Kawneer Canada Limited (Kawneer), Kromet International Inc. (Kromet), 9283-9034 Québec Inc. d.b.a Pexal Tecalum Canada (Pexal), Kaiser Aluminum Limited (Kaiser) and Signature Aluminum Canada Inc. (Signature). All of these producers, save for Kaiser and Signature, filed responses to the Tribunal's domestic producers' questionnaire.<sup>19</sup> However, the responses provided by Apex and Pexal were such that their financial results could not be included with those of the other domestic producers in the investigation reports.<sup>20</sup>

[31] The 13 domestic producers that provided responses to the Tribunal's domestic producers' questionnaire (Almag, Apel, Apex, Astrex, Can Art, Dajcor, Extrudex, Hydro, Kawneer, Kromet, Metra, Pexal and Spectra) all produce custom-shaped aluminum extrusions and, together, accounted for all confirmed domestic production of such extrusions over the POR.<sup>21</sup> Accordingly, the Tribunal finds that, for the purposes of this expiry review, these 13 producers constitute the domestic industry for custom-shaped aluminum extrusions.

[32] Eight of the thirteen domestic producers that provided responses to the Tribunal's domestic producers' questionnaire produce standard-shaped aluminum extrusions. They are Almag, Apex, Can Art, Dajcor, Extrudex, Hydro, Pexal and Spectra.<sup>22</sup> Together, these producers accounted for all confirmed domestic production of standard-shaped aluminum extrusions over the POR.<sup>23</sup> Accordingly, the Tribunal finds that, for the purposes of this expiry review, the domestic industry for standard-shaped aluminum extrusions is composed of these eight producers.

[33] The Tribunal adds that the combined production of only those domestic producers participating in this expiry review (i.e. the Domestic Extruders) represented more than 90 percent of

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<sup>18</sup> The term "major proportion" means an important or significant proportion of total domestic production of the like goods and not necessarily a majority of these goods: *Japan Electrical Manufacturers Assn. v. Canada* (Anti-Dumping Tribunal), [1986] F.C.J. No. 652 (FCA); *McCulloch of Canada Limited and McCulloch Corporation v. Anti-Dumping Tribunal*, [1978] 1 F.C. 222 (FCA); *China – Anti-dumping and Countervailing Duties on Certain Automobiles from the United States* (23 May 2014), WTO Docs. WT/DS440/R, Report of the Panel at para. 7.207; *European Community – Definitive Anti-dumping Measures on Certain Iron or Steel Fasteners from China* (15 July 2011), WTO Docs. WT/DS397/AB/R, Report of the Appellate Body at paras. 411, 412, 419; *Argentina – Definitive Anti-dumping Duties on Poultry from Brazil* (22 April 2003), WTO Docs. WT/DS241/R, Report of the Panel at para. 7.341.

<sup>19</sup> The Tribunal estimates that Kaiser and Signature have minor production and sales volumes and thus likely represent a small proportion of total domestic production of the like goods. The Tribunal notes that it actually received 14 responses to its domestic producers' questionnaire as Extrudex's Ontario and Quebec operations each filed separate questionnaire replies. In these reasons, any reference to "Extrudex" will be taken to mean both its Ontario and Quebec operations.

<sup>20</sup> See Exhibit RR-2018-008-18.13 (protected), Vol. 4 at 26; Exhibit RR-2018-008-18.07A (protected), Vol. 4 at 18.

<sup>21</sup> Exhibit RR-2018-008-05.01, Table 2, Vol. 1.1; Exhibit RR-2018-008-06.03 (protected), Table 2, Vol. 2.1.

<sup>22</sup> Exhibit RR-2018-008-05.01, Table 2, Vol. 1.1.

<sup>23</sup> Exhibit RR-2018-008-06.02 (protected), Table 2, Vol. 2.1.

the total confirmed domestic production of like goods in both classes of goods over the POR.<sup>24</sup> Thus, these producers clearly account for a major proportion of the total confirmed production of like goods.

## CROSS-CUMULATION

[34] The Tribunal must also determine whether it will make an assessment of the cumulative effect of the dumping and subsidizing of the subject goods.

[35] There are no legislative provisions that directly address the issue of cross-cumulation of the effects of both dumping and subsidizing. However, as noted in previous cases, the effects of dumping and subsidizing of the same goods from a particular country are manifested in a single set of injurious price effects and it is not possible to isolate the effects caused by the dumping from the effects caused by the subsidizing. In reality, when the dumped and subsidized goods originate from a single country, the effects are so closely intertwined as to render it impossible to allocate discrete portions of injury to the dumping and the subsidizing.<sup>25</sup>

[36] Given that this expiry review is in respect of dumped and subsidized goods from China only, the likely effects of the resumption of dumping and subsidizing of the subject goods will likewise be manifested in a single set of prices. Therefore, as it did in Expiry Review No. RR-2013-003<sup>26</sup>, the Tribunal will make a cumulative assessment of the likely impact of the continued or resumed dumping and subsidizing of the subject goods on the domestic industry for each class of goods should the order be rescinded.

## LIKELIHOOD OF INJURY ANALYSIS

[37] An expiry review is forward-looking.<sup>27</sup> It follows that evidence from the period during which an order or a finding was being enforced is relevant insofar as it bears upon the prospective analysis of whether the expiry of the order or finding is likely to result in injury.<sup>28</sup>

[38] There is no presumption of injury in an expiry review; findings must be based on positive evidence, in compliance with domestic law and consistent with the requirements of the World Trade Organization.<sup>29</sup> In the context of an expiry review, positive evidence can include evidence based on past facts that tend to support forward-looking conclusions.<sup>30</sup>

[39] In making its assessment of likelihood of injury, the Tribunal has consistently taken the view that the focus should be on circumstances that can reasonably be expected to exist in the near to

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<sup>24</sup> Exhibit RR-2018-008-06.02 (protected), Table 2, Vol. 2.1; Exhibit RR-2018-008-06.03 (protected), Table 2, Vol. 2.1.

<sup>25</sup> See, for example, *Unitized Wall Modules* (3 July 2019), RR-2018-002 (CITT) at para. 47; *Steel Piling Pipe* (4 July 2018), RR-2017-003 (CITT) at para. 41.

<sup>26</sup> *Aluminum Extrusions Review* at paras. 56-57.

<sup>27</sup> *Certain Dishwashers and Dryers* (procedural order dated 25 April 2005), RR-2004-005 (CITT) at para. 16.

<sup>28</sup> *Copper Pipe Fittings* (17 February 2012), RR-2011-001 (CITT) at para. 56. In *Thermoelectric Containers* (9 December 2013), RR-2012-004 (CITT) at para. 14, the Tribunal stated that the analytical context pursuant to which an expiry review must be adjudged often includes the assessment of retrospective evidence supportive of prospective conclusions. See also *Aluminum Extrusions Review* at para. 21.

<sup>29</sup> *Flat Hot-rolled Carbon and Alloy Steel Sheet and Strip* (16 August 2006), RR-2005-002 (CITT) at para. 59.

<sup>30</sup> *Thermoelectric Containers* at para. 14; *Aluminum Extrusions Review* at para. 21.

medium term, which is generally considered to be a period that can extend to 24 months from the date on which the finding or order would be rescinded. In this case, the Tribunal was not presented with any argument that it should consider limiting its examination to a shorter period. It will therefore focus its analysis on the next 24 months.

[40] Subsection 37.2(2) of the *Special Import Measures Regulations*<sup>31</sup> lists factors that the Tribunal may consider in addressing the likelihood of injury in cases where the CBSA has determined that there is a likelihood of continued or resumed dumping and subsidizing. The factors that the Tribunal considers relevant in this expiry review are discussed in detail below. For the most part, the discussion of these factors will be made in common for, and apply to, both classes of goods. However, where appropriate, the Tribunal will make relevant distinctions between the two classes.

### Changes in Market Conditions

[41] In order to assess the likely volumes and prices of the subject goods and their impact on the domestic industry if the order was rescinded, the Tribunal will first consider changes in international and domestic market conditions that occurred during the POR and that are likely to occur over the next 24 months.<sup>32</sup> These changes provide some general context for the Tribunal's analysis and are likely to occur whether the order is continued or rescinded.

#### International Market Conditions

[42] In general, forecasts indicate that the global economy is showing signs of weakness. In July 2019, the International Monetary Fund (IMF), in its World Economic Outlook report, downgraded its 2019 and 2020 global growth forecasts to 3.2 and 3.5 percent, respectively, both 0.1 percentage point lower than its April 2019 forecasts.<sup>33</sup> However, the IMF notes that the 0.3 percentage point increase in forecasted growth for 2020 is precarious and presumes, among other factors, progress toward resolving trade policy differences. The IMF also notes that GDP figures for 2019 and softening inflation indicate weaker-than-anticipated global activity.

[43] Given the limited availability of market forecast data for aluminum extrusions, the Domestic Extruders relied on forecasts for the global primary aluminum market on the basis that such trends are generally indicative of trends for downstream products, such as aluminum extrusions.<sup>34</sup>

[44] CRU data indicate that global consumption of primary aluminum exceeded production in 2016 and 2018, and is forecasted to continue to do so from 2019 to 2022.<sup>35</sup> However, as growth in global production is projected to outpace growth in global consumption over the next 12 to 24 months (i.e. in 2020 and 2021), the rate at which global stocks of primary aluminum are drawn down will be reduced.<sup>36</sup> For China, CRU data indicate that the situation is different as production of primary aluminum exceeded consumption from 2016 to 2018, and is forecasted to continue to do so from

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<sup>31</sup> S.O.R./84-927 [*Regulations*]

<sup>32</sup> See paragraph 37.2(2)(j) of the *Regulations*.

<sup>33</sup> Exhibit RR-2018-008-A-01, Vol. 11 at 116.

<sup>34</sup> Primary aluminum is used as feedstock, and represents the largest input cost, for the production of aluminum extrusions (see Exhibit RR-2018-008-A-01 at paras. 52, 127, Vol. 11).

<sup>35</sup> Exhibit RR-2018-008-A-02 (protected), Vol. 12 at 17, 125.

<sup>36</sup> Exhibit RR-2018-008-A-02 (protected), Vol. 12 at 17, 125.

2020 to 2022.<sup>37</sup> Growth in Chinese production is also projected to outpace growth in Chinese consumption over the next 12 to 24 months.

[45] Global production of primary aluminum is dominated by China. In 2017, China produced 57.1 percent of the world's primary aluminum.<sup>38</sup> Although China's share of world production declined slightly in 2018 and then again in 2019, it is forecasted to increase gradually over the next two years to finally match 2017 levels in 2021. Between 2020 and 2022, Chinese production is also forecasted to continue increasing at a rate that outpaces production growth in the rest of the world.<sup>39</sup>

[46] In addition, China has significant excess production capacity for primary aluminum, which is expected to be more than double that of the rest of the world's combined excess capacity through 2022.<sup>40</sup> The Domestic Extruders submitted that China's overcapacity in primary aluminum spills into downstream products (often called "semis"), which include aluminum extrusions. The evidence indicates that Chinese overcapacity in semis has more than quadrupled since 2008.<sup>41</sup>

[47] In terms of global demand for aluminum extrusions, CRU projects growth trending closely to that projected for the global primary aluminum market from 2019 through to 2022.<sup>42</sup> Although CRU does not forecast aluminum extrusion production, if such production parallels primary aluminum production, it could reasonably be expected that production growth for aluminum extrusions will exceed demand growth over the next 12 to 24 months.

[48] The Domestic Extruders also submitted that recent U.S. import restrictions on aluminum extrusions are pushing producers of the subject goods to search for other markets. Most notably, in March 2018, the United States, acting pursuant to section 232 of the U.S. *Trade Expansion Act of 1962*, imposed a 10 percent duty on imports of "aluminum articles", including aluminum extrusions, from most countries, including China (the section 232 measures).<sup>43</sup> Although Canada was initially excluded from the application of the section 232 measures, on May 31, 2018, the United States extended them to include Canada. On July 1, 2018, Canada responded by imposing retaliatory tariffs, i.e. a 10 percent surtax on imports of certain products, including aluminum extrusions, from the United States. On May 17, 2019, the United States and Canada announced that they had reached an agreement whereby the United States agreed to eliminate all tariffs imposed by the section 232 measures on imports of aluminum products from Canada, and Canada agreed to eliminate all tariffs imposed in retaliation thereof.

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<sup>37</sup> Exhibit RR-2018-008-A-02 (protected), Vol. 12 at 17, 125. The Tribunal notes that consumption exceeded production by a very small margin in 2019.

<sup>38</sup> Exhibit RR-2018-008-A-02 (protected), Vol. 12 at 125. A report published by the United States International Trade Commission (USITC) in June 2017 on factors affecting the global competitiveness of the U.S. aluminum industry indicates that, in 2015, China produced 64 percent of the world's aluminum extrusions (see Exhibit RR-2018-008-A-01, Vol. 11 at 180).

<sup>39</sup> Exhibit RR-2018-008-A-02 (protected), Vol. 12 at 125.

<sup>40</sup> Exhibit RR-2018-008-A-02 (protected), Vol. 12 at 125.

<sup>41</sup> Exhibit RR-2018-008-A-01, Vol. 11 at 943.

<sup>42</sup> Exhibit RR-2018-008-A-02 (protected), Vol. 12 at 125-126.

<sup>43</sup> Exhibit RR-2018-008-A-01, Vol. 11 at 1466-1469. The section 232 measures cover goods classified in headings No. 76.01, 76.04 to 76.09 and 76.16. The subject goods are generally classified in headings No. 76.04, 76.08 and 76.10 (see Exhibit RR-2018-008-05.01, Vol. 1.1 at 5). Therefore, aluminum extrusions classified under heading No. 76.10, while not subject to the section 232 measures, are covered by the Tribunal's order.



[49] This measure, as well as other measures discussed further below, gives rise to a heightened risk of diversion that did not exist to the same extent at the time of the last expiry review. As a result, Chinese manufacturers and exporters will be less likely to export their excess production of aluminum extrusions to the United States and will thus be more likely to seek other markets, such as Canada.

### Domestic Market Conditions

[50] Forecasts suggest that the Canadian economy is in a soft patch. According to TD Economics, real GDP growth is expected to average 1.3 percent in 2019 before strengthening to 1.7 percent in 2020.<sup>44</sup> The IMF similarly forecasts a decrease in GDP growth to 1.5 percent for 2019 followed by a moderate increase to 1.9 percent in 2020.<sup>45</sup>

[51] The evidence on the record shows that the Canadian apparent market for both classes of goods generally grew over the POR. For custom-shaped aluminum extrusions, the market grew by 7 percent in 2017 and by 1 percent in 2018, but decreased by 3 percent in interim 2019 as compared to interim 2018.<sup>46</sup> Meanwhile, the market for standard-shaped aluminum extrusions grew by 8 percent in 2017, by 16 percent in 2018 and by 4 percent in interim 2019 as compared with interim 2018.<sup>47</sup> Domestic producer and total market pricing also generally increased throughout the POR for both classes of goods.<sup>48</sup> However, total market pricing for both classes of goods did decrease slightly in interim 2019 when compared to full year 2018 prices.

[52] With respect to custom-shaped aluminum extrusions, the share of total imports represented by imports of subject goods decreased significantly over the POR, from 13 percent in 2016 down to 2 percent interim 2019, and the share of imports from the United States remained relatively steady throughout the POR until interim 2019, when it was nearly reduced in half.<sup>49</sup> Conversely, the share of imports from other non-subject countries increased from 33 percent in 2016 to 69 percent in interim 2019. The same trends can be observed with respect to market share.<sup>50</sup> As for the domestic industry, its share of the market remained relatively stable throughout the POR.

[53] With respect to standard-shaped aluminum extrusions, there were almost no imports of subject goods during the POR.<sup>51</sup> The share of total imports represented by imports from the United States decreased from 81 percent in 2016 to 66 percent in interim 2019, with most of the decline occurring in interim 2019.<sup>52</sup> Conversely, the share of imports from other non-subject countries increased from 19 percent in 2016 to 34 percent in interim 2019, with most of the increase occurring in interim 2019. Again, the same trends can also be observed with respect to market share.<sup>53</sup> As for the domestic industry, its share of the market decreased slightly over the POR.

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<sup>44</sup> Exhibit RR-2018-008-A-01, Vol. 11 at 227.

<sup>45</sup> Exhibit RR-2018-008-A-01, Vol. 11 at 123.

<sup>46</sup> Exhibit RR-2018-008-05.03, Table 8, Vol. 1.1.

<sup>47</sup> Exhibit RR-2018-008-05.02, Table 8, Vol. 1.1.

<sup>48</sup> Exhibit RR-2018-008-05.02, Table 13, Vol. 1.1; Exhibit RR-2018-008-05.03, Table 13, Vol. 1.1.

<sup>49</sup> Exhibit RR-2018-008-05.03, Table 5, Vol. 1.1.

<sup>50</sup> Exhibit RR-2018-008-05.03, Table 9, Vol. 1.1.

<sup>51</sup> Exhibit RR-2018-008-05.02, Table 3, Vol. 1.1.

<sup>52</sup> Exhibit RR-2018-008-05.02, Table 5, Vol. 1.1.

<sup>53</sup> Exhibit RR-2018-008-05.02, Table 9, Vol. 1.1.

[54] The marked decline in imports of aluminum extrusions from the United States in interim 2019, and the corresponding increase in imports from other non-subject countries was likely attributable to Canada's retaliatory tariffs imposed in response to the section 232 measures.

[55] Looking forward, the evidence on the record indicates that domestic demand for aluminium extrusions may be soft over the next 12 to 24 months as it trends with demand for products within certain market sectors. In particular, housing activity is expected to slow down gradually into 2020, declining from the 10-year high recorded in 2017.<sup>54</sup> While population growth will continue to stimulate new construction, it will do so at a slower pace than in previous years due to expected declines in international migration, increasing borrowing costs and changing demographics.<sup>55</sup> Declines in the automotive sector attributable to decreasing investment, sales and production will also contribute to weakening demand for aluminum extrusions.<sup>56</sup>

[56] Both producers and distributors appear to echo this view. For example, Apex expects that the Canadian market will remain flat and that demand will not increase significantly, although it expects that low-priced imports will continue to increase.<sup>57</sup> Can Art expects the domestic market to remain flat in 2020 and 2021, relative to 2019.<sup>58</sup> For their part, Apel and Metra expressed similar outlooks, although Metra also noted that it expects demand to be driven down by the economic slowdown in the United States.<sup>59</sup> Samuel, Son & Co., a distributor, expects a downturn of approximately 5 percent over the next 12 to 24 months.<sup>60</sup>

[57] From this evidence, the Tribunal finds that the domestic market will not experience any substantial growth in the next 24 months. As the demand for aluminum extrusions is unlikely to strengthen significantly in the near future, the Tribunal finds that the current and foreseeable domestic market conditions are likely to increase the domestic industry's vulnerability to the resumed or continued dumping and subsidizing of the subject goods for both classes of goods.

### **Likely Import Volume of the Dumped and Subsidized Goods**

[58] Paragraph 37.2(2)(a) of the *Regulations* directs the Tribunal to consider the likely volume of the dumped and subsidized goods if the order is allowed to expire, and, in particular, whether there is likely to be a significant increase in the volume of imports of the dumped and subsidized goods, either in absolute terms or relative to the production or consumption of like goods.

[59] The Tribunal's assessment of the likely volume of the dumped and subsidized goods encompasses the likely performance of the foreign industry, the potential for the foreign producers to produce goods in facilities that are currently used to produce other goods, evidence of the imposition of anti-dumping and/or countervailing measures in other jurisdictions in respect of goods of the same description or similar goods, and whether measures adopted by other jurisdictions are likely to cause a diversion of the subject goods to Canada.<sup>61</sup>

<sup>54</sup> Exhibit RR-2018-008-A-01, Vol. 11 at 265.

<sup>55</sup> Exhibit RR-2018-008-A-01, Vol. 11 at 265.

<sup>56</sup> Exhibit RR-2018-008-A-01, Vol. 11 at 274-276, 278-280, 284-288.

<sup>57</sup> Exhibit RR-2018-008-C-03 at para. 12, Vol. 11.

<sup>58</sup> Exhibit RR-2018-008-D-03 at para. 15, Vol. 11.

<sup>59</sup> Exhibit RR-2018-008-B-03 at paras. 27, 32, Vol. 11; Exhibit RR-2018-008-H-04 at para. 14, Vol. 11.

<sup>60</sup> Exhibit RR-2018-008-20.31, Vol. 5 at 10.

<sup>61</sup> See paragraphs 37.2(2)(d), (f), (h) and (i) of the *Regulations*.

[60] The Domestic Extruders submitted that, if the order is rescinded, the volume of imports of subject goods into Canada will be significant and will cause injury to the domestic industry. In support of their position, they refer to a number of elements that they believe will contribute to greater import volumes, including a projected decrease in demand growth for aluminum extrusions in China, Chinese policies encouraging the production and export of aluminum extrusions, increasing production and production capacity, trade measures taken against aluminum extrusions in other jurisdictions, a slowdown in China's major export markets and the continued interest of Chinese producers in the Canadian market.

[61] For the reasons set out below, the Tribunal finds that it is highly likely that the rescission of the order would result in a significant increase in the volume of imports of subject goods for both classes of goods in the next 24 months.

[62] First, China is the world's leading producer of aluminum extrusions and has massive excess production capacity, which provides its producers with the opportunity to significantly increase production levels. According to evidence on the record, China produced more than 17 million tonnes of aluminum extrusions in 2015—a 44 percent increase over the amount it produced just four years earlier.<sup>62</sup> This amount also represented 64 percent of the world's total production of aluminum extrusions for that year.

[63] As for production capacity, information obtained by the Domestic Extruders from China's National Bureau of Statistics indicates that, in 2018, China's excess production capacity for aluminum extrusions was approximately 30 times larger than the size of the entire Canadian market for both classes of goods combined for that year.<sup>63</sup> Moreover, the evidence on the record indicates that there are a number of individual producers in China that, alone, have production capacity exceeding the size of the entire Canadian market.<sup>64</sup>

[64] Chinese excess production capacity for primary aluminum in 2018 was even greater as it stood at approximately 45 times the size of the entire Canadian market for both classes of goods combined for that year.<sup>65</sup> According to CRU, China has also recently added, and continues to add, significant primary aluminum production capacity through greenfield and brownfield expansions.<sup>66</sup> Taking into account the fact that primary aluminum is used as feedstock for the production of aluminum extrusions, such excess production capacity helps to ensure that excess capacity for aluminum extrusions can actually be utilized. In other words, greater excess capacity for primary aluminum supports increased capacity utilization for aluminum extrusions.

[65] Second, Chinese producers are, for many reasons, incentivized to produce and export increasingly higher volumes of aluminum extrusions and must therefore continually seek export markets for their products. As is generally the case with industries that exhibit high fixed costs, there is a production imperative to maintain high capacity utilization rates, which creates an incentive to

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<sup>62</sup> Exhibit RR-2018-008-A-01, Vol. 11 at 180.

<sup>63</sup> Exhibit RR-2018-008-A-02 (protected), Vol. 12 at 986; Exhibit RR-2018-008-05.02, Table 7, Vol. 1.1; Exhibit RR-2018-008-05.03, Table 7, Vol. 1.1.

<sup>64</sup> See, for example, Exhibit RR-2018-008-A-01, Vol. 11 at 968, 973, 989.

<sup>65</sup> Exhibit RR-2018-008-A-02 (protected), Vol. 12 at 125; Exhibit RR-2018-008-05.02, Table 7, Vol. 1.1; Exhibit RR-2018-008-05.03, Table 7, Vol. 1.1.

<sup>66</sup> Exhibit RR-2018-008-A-02 (protected), Vol. 12 at 332.

rely on export markets to absorb any excess production.<sup>67</sup> The Tribunal is of the view that Chinese producers of aluminum extrusions face such a production imperative.

[66] Moreover, the Domestic Extruders submitted, and the evidence indicates, that the Chinese government maintains policies that are aimed at increasing the production and exportation of aluminum extrusions. As such, the Chinese producers' decisions are not entirely based on market considerations. For example, according to the Organisation for Economic Co-operation and Development, the Chinese government uses value-added tax rebates and export taxes selectively to discourage exports of primary aluminum while encouraging exports of certain semis, including aluminum extrusions.<sup>68</sup> As a result, despite being the world's largest producer of primary aluminum, China accounts for a very small proportion of global exports of primary aluminum, which is instead sold domestically for lower prices than would otherwise be obtained in global markets.<sup>69</sup> The net effect is that Chinese producers are incentivized to convert primary aluminum into aluminum extrusions for export.

[67] In fact, China's clear export orientation is beyond dispute as it has become the world's largest exporter of wrought aluminum products.<sup>70</sup> CRU data indicate that, between 2015 and 2018, China's net exports of semis increased by more than 50 percent and are projected to increase by another 20 percent between 2018 and 2021.<sup>71</sup> CRU data also indicate that, between 2015 and 2018, Chinese exports of aluminum extrusions increased by about 25 percent.<sup>72</sup>

[68] China's export orientation is further demonstrated by the fact that exports of aluminum extrusions dominate many major global markets. For example, UN Comtrade data indicate that Chinese aluminum extrusions that are classified under the same HS codes as the subject goods account for more than 50 percent of imports in Japan, Australia, Malaysia and South Africa, and 43 percent of imports in India.<sup>73</sup> Additionally, a number of Chinese producers clearly state their export orientation in annual report and on websites.<sup>74</sup>

[69] Looking forward, a factor that will further increase the volume of Chinese aluminum extrusions that are exported in the near to medium term is the projected economic slowdown for China's economy and decrease in demand growth for such goods in China. In July 2019, the IMF lowered its projections for China's economic growth, noting the negative effects of escalating tariffs and weakening external demand.<sup>75</sup> As for aluminum extrusions, annual growth in Chinese demand is expected to be significantly lower between 2019 and 2021 than it was at any time between 2012 and 2017.<sup>76</sup> The Tribunal notes that, in 2018, Chinese production of aluminum extrusions already exceeded demand by an amount that is nearly 5 times the size of the entire Canadian market for both classes of goods combined for that year.<sup>77</sup>

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<sup>67</sup> See, for example, *Corrosion-resistant Steel Sheet* (21 February 2019), NQ-2018-004 (CITT) at para. 112.

<sup>68</sup> Exhibit RR-2018-008-A-01, Vol. 11 at 489-490. See also Exhibit RR-2018-008-A-01, Vol. 11 at 155.

<sup>69</sup> Exhibit RR-2018-008-A-01, Vol. 11 at 494.

<sup>70</sup> Exhibit RR-2018-008-A-01, Vol. 11 at 148.

<sup>71</sup> Exhibit RR-2018-008-A-02 (protected), Vol. 12 at 126.

<sup>72</sup> Exhibit RR-2018-008-A-02 (protected), Vol. 12 at 1073.

<sup>73</sup> Exhibit RR-2018-008-A-01, Vol. 11 at 1039.

<sup>74</sup> See, for example, Exhibit RR-2018-008-A-01, Vol. 11 at 423, 973-974, 1134, 1139.

<sup>75</sup> Exhibit RR-2018-008-A-01, Vol. 11 at 119.

<sup>76</sup> Exhibit RR-2018-008-A-02 (protected), Vol. 12 at 331.

<sup>77</sup> Exhibit RR-2018-008-A-02 (protected), Vol. 12 at 331, 986; Exhibit RR-2018-008-05.02, Table 7, Vol. 1.1; Exhibit RR-2018-008-05.03, Table 7, Vol. 1.1.

[70] This expected decrease in demand growth is consistent with projections for China's economic growth as well as with information regarding the projected slowdown in industries that use aluminum extrusions and other aluminum products. Indeed, CRU projects a significant decrease in yearly total demand for semis in China over the next 24 months, with the majority of the decrease occurring in the transportation, construction, and machinery and equipment sectors.<sup>78</sup> The Tribunal notes that these projections are corroborated by other evidence indicating weak or declining domestic demand in the construction, real estate and automotive sectors in China.<sup>79</sup>

[71] Third, the continued presence of subject goods throughout the POR, despite the imposition of anti-dumping and countervailing duties, suggests that Chinese producers have maintained interest in the Canadian market. Even if there were minimal imports and sales of subject standard-shaped aluminum extrusions during the POR,<sup>80</sup> their presence nonetheless indicates that Chinese producers have maintained access to distribution channels in the Canadian market such that larger volumes could easily be imported should the order be rescinded.<sup>81</sup> Evidence of potential circumvention attempts by Chinese producers also suggests that the Canadian market is attractive to them and supports the view that they will target Canada if the order is rescinded.<sup>82</sup>

[72] Fourth, there are a number of trade measures in other jurisdictions, as well as other factors, that are likely to cause a diversion of the subject goods into Canada if the order is rescinded. Currently, Australia and the United States have both anti-dumping and countervailing measures in effect against imports of aluminum extrusions from China, whereas Colombia, Vietnam and Trinidad and Tobago have anti-dumping measures in place.<sup>83</sup> In addition to the foregoing are the section 232 measures in the United States, which impose a 10 percent duty on imports of aluminum articles, including most subject goods.<sup>84</sup> These measures will remain in place for such time as the President of the United States deems necessary.<sup>85</sup>

[73] There is also the ongoing U.S.-China trade dispute, which has seen both countries impose tariffs on an increasing number of each other's exports. The dispute has resulted in at least \$550 billion worth of Chinese imports being subject to tariffs in the United States (the section 301 tariffs).<sup>86</sup> All Chinese imports falling under a prescribed list of HS codes are currently subject to either a 15 or

<sup>78</sup> Exhibit RR-2018-008-A-02 (protected), Vol. 12 at 374.

<sup>79</sup> Exhibit RR-2018-008-A-01, Vol. 11 at 357, 360-362, 372-375, 396-398.

<sup>80</sup> Exhibit RR-2018-008-05.02, Tables 3, 7, Vol. 1.1.

<sup>81</sup> The Tribunal's General Information Investigation Report indicates that a significant number of importers imported subject custom-shaped and standard-shaped aluminum extrusions over the POR (see Exhibit RR-2018-008-05.01, Table 12, Vol. 1.1).

<sup>82</sup> Exhibit RR-2018-008-D-03 at paras. 19-25, Vol. 11; Exhibit RR-2018-008-C-04A (protected) at para. 18a), Vol. 12. The Tribunal also notes that, in August 2019, the U.S. Department of Commerce determined that aluminum extrusions exported from Vietnam, that were produced from aluminum previously extruded in China were circumventing anti-dumping and countervailing duty measures imposed on Chinese aluminum extrusions exported to the United States (see Exhibit RR-2018-008-A-01 at para. 157, Vol. 11; United States, Department of Commerce, "Aluminum Extrusions from the People's Republic of China: Final Affirmative Determination of Circumvention of the Antidumping and Countervailing Duty Orders, and Partial Rescission", 84 FR 39805 (12 August 2019), A-570-967, C-570-968).

<sup>83</sup> Exhibit RR-2018-008-05.01, Table 22, Vol. 1.1; Exhibit RR-2018-008-A-01, Vol. 11 at 1449-1452. Vietnam imposed provisional measures in June 2019 and planned to complete its investigation in the fourth quarter of 2019.

<sup>84</sup> See footnote 43.

<sup>85</sup> See section 232(b) of the U.S. *Trade Expansion Act of 1962*.

<sup>86</sup> Exhibit RR-2018-008-A-01, Vol. 11 at 1535, 1538-1544, 1627-1629.

25 percent tariff.<sup>87</sup> The net result is that most aluminum extrusions covered by the Tribunal's order are subject to a combined section 232 and section 301 tariff of 25 percent when imported into the United States.<sup>88</sup> The risk of diversion from these measures was not present at the time of the last expiry review.

[74] Fifth, the view that subject goods would return to the Canadian market in increased volumes if the order were rescinded is held by several importers and customers of the Domestic Extruders.<sup>89</sup> The Tribunal notes that some of the Domestic Extruders' witnesses, using information from the market situation that prevailed prior to the issuance of the Tribunal's initial findings, indicated in their statements that a significant amount of subject goods would flood the Canadian market shortly following the rescission of the order.<sup>90</sup>

[75] In summary, the Tribunal finds that all of these conditions together make it very likely that the rescission of the order would result in a significant increase, in both absolute and relative terms, in the volume of imports of subject custom-shaped and standard-shaped aluminum extrusions into Canada over the next 24 months.

### **Likely Price Effects of the Dumped and Subsidized Goods**

[76] The Tribunal must consider whether, if the order is allowed to expire, the dumping and subsidizing of the subject goods is likely to significantly undercut the prices of like goods, depress those prices, or suppress them by preventing increases in those prices that would likely have otherwise occurred.<sup>91</sup> In this regard, the Tribunal distinguishes the price effects of the dumped and subsidized goods from any price effects that would likely result from other factors affecting prices.

[77] However, before addressing the likely price effects of the dumped and subsidized goods, the Tribunal must first determine the relative importance of price in purchasing decisions for aluminum extrusions as well as the proper point at which to compare prices between imported and domestically produced aluminum extrusions.

[78] The Domestic Extruders submitted that subject goods and like goods meeting the same shape, dimensional, mechanical and chemical characteristics are identical or substitutable and that price is the principal determinant in purchasing decisions between the two. They added that, while each extruder will market the particular benefits or approach they may have with respect to their specific manufacturing process, delivery schedules, finishing or overall customer service, price remains the primary consideration, with the cost of aluminum being a key component to pricing.

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<sup>87</sup> The tariff of 25 percent applied on \$250 billion of Chinese imports was scheduled to be increased to 30 percent on October 15, 2019 (see Exhibit RR-2018-008-A-01, Vol. 11 at 1630-1631). However, it does not appear that this increase was implemented (see <https://www.strtrade.com/f-tariff-actions-resources.html>).

<sup>88</sup> Aluminum extrusions classified in headings No. 76.04 and 76.08 are subject to a 10 percent section 232 tariff and 15 percent section 301 tariff, whereas some aluminum extrusions classified in heading No. 76.10 are subject to a 15 percent section 301 tariff only and others a 25 percent section 301 tariff (see footnote 86; Exhibit RR-2018-008-A-01 at para. 180, Vol. 11).

<sup>89</sup> Exhibit RR-2018-008-A-05 at para. 15, Vol. 11; Exhibit RR-2018-008-20.02A, Vol. 5 at 11; Exhibit RR-2018-008-20.08, Vol. 5 at 10; Exhibit RR-2018-008-20.31, Vol. 5 at 10; Exhibit RR-2018-008-20.32A, Vol. 5 at 10.

<sup>90</sup> Exhibit RR-2018-008-B-03 at para. 33, Vol. 11; Exhibit RR-2018-008-D-03 at para. 31, Vol. 11; Exhibit RR-2018-008-H-03 at para. 33, Vol. 11.

<sup>91</sup> Paragraph 37.2(2)(b) of the *Regulations*.

[79] In Inquiry No. NQ-2008-003, the Tribunal stated that “while price might not be necessarily the most important consideration in the purchasing process of either custom-shaped or standard-shaped aluminum extrusions and may come after other factors such as quality and availability of specifications, the evidence indicates that price remains a very important consideration for most purchasers . . . .”<sup>92</sup> This finding was not called into question in Expiry Review No. RR-2013-003.

[80] The evidence on the record in the present expiry review indicates that price continues to be a very important consideration in customers’ purchasing decisions for both custom-shaped and standard-shaped aluminum extrusions and that, in some instances, customers of the Domestic Extruders would switch suppliers solely on the basis of price.<sup>93</sup> Indeed, there is some evidence indicating that the costs involved in switching suppliers are minimal such that they are not a barrier to a customer’s decision to transfer its business to a lower-priced supplier.<sup>94</sup> Therefore, for the purposes of this expiry review, the Tribunal will continue to consider price as one of the most, if not the most, important factor driving customers’ purchasing decisions.

[81] As for the point at which price competition takes place, the Tribunal found in Expiry Review No. RR-2013-003 that it was the comparison between the importers’ purchase price and the domestic producer’s selling price that was most indicative of price competition in the Canadian market.<sup>95</sup> The evidence in that expiry review indicated that many of the larger importers that had completed the Tribunal’s questionnaire were the same purchasers to whom the domestic industry sold its aluminum extrusions and that, in such instances, the domestic producer lost the sale when the importer decided to purchase imported goods.<sup>96</sup>

[82] There is no evidence in the present expiry review that suggests that market conditions have changed such that this comparison is no longer appropriate. Therefore, as it did in Expiry Review No. RR-2013-003, the Tribunal will compare the net delivered purchase value of imports to the net delivered selling value of domestically produced goods for the purposes of examining trends in pricing over the POR and assessing the likely price effects of the dumped and subsidized goods in both classes of goods.<sup>97</sup>

[83] Turning to the likely price effects of the dumped and subsidized goods, the Domestic Extruders submitted that, if the order is rescinded, subject goods will likely be sold at prices that undercut not only the prices offered by domestic producers but also the lowest-priced imports currently being imported into Canada so as to regain market share, thereby further depressing market prices. The Domestic Extruders estimated that the subject goods would be offered at prices that are approximately 30 percent below domestic pricing.<sup>98</sup> The Tribunal notes that the Domestic Extruders’ submissions on likely prices and price effects are the same for both classes of goods.

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<sup>92</sup> *Aluminum Extrusions Inquiry* at para. 155.

<sup>93</sup> Exhibit RR-2018-008-A-03 at para. 58, Vol. 11; Exhibit RR-2018-008-A-05 at para. 11, Vol. 11; Exhibit RR-2018-008-B-03 at para. 25, Vol. 11; Exhibit RR-2018-008-D-03 at para. 11, Vol. 11; Exhibit RR-2018-008-E-03 at paras. 2, 17, Vol. 11; Exhibit RR-2018-008-F-03 at paras. 18, 43, Vol. 11; Exhibit RR-2018-008-G-03 at para. 14, Vol. 11; Exhibit RR-2018-008-H-03 at para. 27, Vol. 11.

<sup>94</sup> Exhibit RR-2018-008-D-03 at paras. 11-12, Vol. 11; Exhibit RR-2018-008-G-03 at para. 14, Vol. 11.

<sup>95</sup> *Aluminum Extrusions Review* at para. 113.

<sup>96</sup> *Aluminum Extrusions Review* at para. 113.

<sup>97</sup> Aluminum extrusions are typically sold on a weight basis. In the Tribunal’s investigation reports, prices are expressed in dollars per kilogram (\$/Kg).

<sup>98</sup> See, for example, Exhibit RR-2018-008-A-03 at para. 70, Vol. 11; Exhibit RR-2018-008-F-03 at paras. 30, 34, Vol. 11.

[84] Data from the Tribunal's investigation reports show that, while the domestic industry's average unit value of domestic sales from domestic production increased steadily throughout the POR for both classes of goods, the average unit purchase value of subject imports remained below this price in all periods except in interim 2019 for custom shapes (when it was 16 percent higher) and in 2018 for standard shapes (when it was 5 percent higher).<sup>99</sup> This is despite the fact that anti-dumping and countervailing duties, representing between 19 and 48 percent of the total value for duty declared to the CBSA at the time of importation, were collected on subject imports during the POR.<sup>100</sup>

[85] That being said, the average unit purchase value of imports from non-subject countries other than the United States was even lower than the average unit purchase value of subject imports in each period of the POR for both classes of goods, except in 2016 for standard shapes.<sup>101</sup> It was also lower than the domestic industry's average unit selling value in each period, except in 2016 for standard shapes where it exceeded the domestic producers' selling price by one cent per kilogram.<sup>102</sup> In percentage terms, the average unit purchase value of imports from non-subject countries other than the United States was between 10 and 21 percent lower than the domestic industry's average unit selling value for custom shapes during the POR and between 10 and 37 percent lower for standard shapes (except in 2016 where it was 0.2 percent higher).

[86] The Tribunal finds that the above information indicates that, should the order be rescinded and the duties lifted, import purchase prices for subject goods in both classes of goods will, in all likelihood, consistently and significantly undercut domestic producers' selling prices as Chinese producers and exporters attempt to regain sales and market share by lowering prices below import prices of non-subject goods from countries other than the United States.

[87] This is further supported by evidence on the record pertaining to prices at which the subject goods are offered for sale in Canada, the pricing behaviour of Chinese producers prior to the Tribunal's findings in 2009, prices for Chinese aluminum extrusions in other markets, as well as prices of non-subject goods imported into Canada from a select number of low-priced countries. Each of these points is addressed in more detail below.

[88] The Domestic Extruders provided evidence that Chinese producers appear to be ready, willing and able to undercut all participants in the Canadian market. For example, Can Art received an unsolicited offer for 11 Chinese origin aluminum extrusion products at prices that were, on average, 29 percent below those of Can Art.<sup>103</sup> For its part, Extrudex received two quotes from a

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<sup>99</sup> Exhibit RR-2018-008-05.02, Tables 11, 13, Vol. 1.1; Exhibit RR-2018-008-05.03, Tables 11, 13, Vol. 1.1. The Tribunal notes that import volumes of subject standard-shaped aluminum extrusions represented less than 0.5 percent of total imports throughout the POR (see Exhibit RR-2018-008-05.02, Table 5, Vol. 1.1). Such a small volume of imports may result in average unit purchase values for the subject goods that are not representative of average prices for standard shapes. Import volumes of subject custom-shaped aluminum extrusions represented between 2 and 13 percent of total imports over the POR (see Exhibit RR-2018-008-05.03, Table 5, Vol. 1.1).

<sup>100</sup> Exhibit RR-2018-008-05.02, Table 1, Vol. 1.1. The Tribunal notes that the CBSA enforcement data from which these figures were obtained does not distinguish between custom-shaped and standard-shaped aluminum extrusions.

<sup>101</sup> Exhibit RR-2018-008-05.02, Table 11, Vol. 1.1; Exhibit RR-2018-008-05.03, Table 11, Vol. 1.1.

<sup>102</sup> Exhibit RR-2018-008-05.02, Tables 11, 13, Vol. 1.1; Exhibit RR-2018-008-05.03, Tables 11, 13, Vol. 1.1.

<sup>103</sup> Exhibit RR-2018-008-D-03 at paras. 19-25, Vol. 11; Exhibit RR-2018-008-D-04 (protected), Attachments 3-12, Vol. 12. The Chinese firm making the offer suggested that the Tribunal's order could be circumvented by having the products re-exported through a third-country.



Chinese producer for standard-shaped aluminum extrusions at prices that were 16 to 19 percent lower than Extrudex's lowest price at the time and for custom-shaped aluminum extrusions at prices that were 30 to 32 percent lower.<sup>104</sup>

[89] The Tribunal notes that the aforementioned level of price undercutting is corroborated by a number of importers who indicated in their responses to the Tribunal's importers' questionnaire that imports of aluminum extrusions from overseas are lower in price than domestically produced aluminum extrusions.<sup>105</sup>

[90] The Domestic Extruders submitted that Chinese producers of subject goods have a history of price undercutting and are likely to re-engage in the same pricing behaviour that they exhibited prior to the Tribunal's findings in 2009 should the order be rescinded. In Inquiry No. NQ-2008-003, the Tribunal found that, over the period of inquiry, subject custom-shaped and standard-shaped aluminum extrusions had undercut domestic producers' selling prices by a margin ranging between 11 and 19 percent, and 11 and 20, respectively.<sup>106</sup> Given the evidence on the current and expected market conditions, discussed above, there is no reason to believe that Chinese producers of subject goods would not adopt the same aggressive pricing behaviour should the order be rescinded.<sup>107</sup>

[91] The Domestic Extruders also provided evidence that subject goods consistently undercut other imports in various other markets. Indeed, UN Comtrade data show that, in a number of major markets where there were no anti-dumping or countervailing measures in effect, Chinese aluminum extrusion products that are classified under the same HS codes as the subject goods undercut the world import price (which includes Chinese pricing) for those markets by 10 to 50 percent in 2018.<sup>108</sup> These products also undercut the world import price in the United States by 38 percent in that same year, notwithstanding the fact that anti-dumping and countervailing measures applied to imports of Chinese aluminum extrusions in that market.

[92] While the Tribunal is reluctant to ascribe much weight to this type of data, it is of the view that the magnitude of the observed price undercutting confirms that, should the order be rescinded,

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<sup>104</sup> Exhibit RR-2018-008-F-03 at paras. 27-30, Vol. 11; Exhibit RR-2018-008-F-04 (protected), Attachments 4-6, Vol. 12.

<sup>105</sup> Exhibit RR-2018-008-20.02B, Vol. 5 at 11; Exhibit RR-2018-008-20.05, Vol. 5 at 8; Exhibit RR-2018-008-20.13, Vol. 5 at 8; Exhibit RR-2018-008-20.22, Vol. 5 at 8; Exhibit RR-2018-008-21.22A (protected), Vol. 6 at 8. Some importers made reference to prices for aluminum extrusions from overseas, while other made direct reference to Chinese aluminum extrusions. As noted by the Domestic Extruders and as the Tribunal finds on the evidence, if the reference to aluminum extrusions from overseas is not a reference to Chinese aluminum extrusions, it is the level of price undercutting at which Chinese producers will likely need to compete in order to regain market share.

<sup>106</sup> *Aluminum Extrusions Inquiry* at paras. 171, 270. The Tribunal notes that, in the original inquiry, the level of price undercutting was established by comparing selling prices of imports and domestically produced goods in the market. Had the Tribunal compared importers' purchase prices with domestic producers' selling prices, as it did in Expiry Review No. RR-2013-003 and as it has decided is appropriate in the current expiry review, the level of price undercutting would have been greater.

<sup>107</sup> The Tribunal is of the view that past pricing behaviour, provided that the overall context remains largely the same, can, in certain cases, be an indicator of potential future pricing behaviour.

<sup>108</sup> Exhibit RR-2018-008-A-01, Vol. 11 at 47, 1039. The UN Comtrade data supplied by the Domestic Extruders cover Japan, Australia, the United States, the United Kingdom, Malaysia, Germany, India and South Africa. However, both Australia and the United States have anti-dumping and countervailing measures in effect against imports of aluminum extrusions from China (see Exhibit RR-2018-008-05.01, Table 22, Vol. 1.1).

Chinese producers are likely to significantly undercut both domestic producers' selling prices and import prices of non-subject goods from countries other than the United States.

[93] With respect to imports of goods from non-subject countries, the Domestic Extruders provided evidence in the form of Statistics Canada data indicating that, over the POR, the main low-priced import sources of aluminum extrusion products classified under the same HS codes as the subject goods were Malaysia, Thailand and Vietnam, and that, taken together, average import prices for these three countries were below domestic producers' average selling prices (for both classes of goods combined) by 31 to 33 percent.<sup>109</sup>

[94] Although the reliability of the Statistics Canada data is questionable due to the high probability that it includes goods falling outside of the product definition and that the import prices are non-delivered prices (which are then improperly compared to the domestic producers' average delivered selling prices for both classes of goods combined), it nonetheless indicates that Malaysia, Thailand and Vietnam are the price leaders in the Canadian market and that average import prices for these countries are likely lower than average import prices for all countries other than the United States.<sup>110</sup> Commercial intelligence gathered by the Domestic Extruders does confirm that the domestic industry is currently facing low-priced imports from Malaysia, Vietnam and other countries such as Spain and India.<sup>111</sup> Given the importance of price in purchasing decisions, it is therefore likely that, in order to regain market share, the subject goods would have to compete with, and likely be priced lower than, imports from these countries.

[95] In summary, on the basis of the foregoing evidence, the Tribunal finds that, if the order is rescinded, both subject custom-shaped and standard-shaped aluminum extrusions will likely undercut domestic producers' selling prices by 25 percent or more in order to regain market share.

[96] As a result, it is reasonable to project that, if the order is rescinded, the domestic industry's selling prices would be forced down by a significant amount below the price that would otherwise prevail. Indeed, in this scenario, given purchasers' price sensitivity<sup>112</sup>, the domestic industry for each class of goods will have no other choice but to reduce its prices in order to maintain minimum levels of production and sales. The commonly held view among Domestic Extruders is that prices will decrease by a minimum of 10 percent in the 12 months following the rescission of the order.<sup>113</sup> While the Domestic Extruders' projections regarding the magnitude of the expected levels of price depression were not challenged in this proceeding owing to the lack of any submissions opposing the

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<sup>109</sup> Exhibit RR-2018-008-A-01, Vol. 11 at 64, 1922-1924.

<sup>110</sup> The Tribunal notes that, even if a reasonable amount for delivery of 6 to 8 percent is added to the average import prices, they remain below domestic producers' selling prices by 25 percent.

<sup>111</sup> See, for example, Exhibit RR-2018-008-I-03 at para. 28, Vol. 11; Exhibit RR-2018-008-G-03 at para. 15, Vol. 11; Exhibit RR-2018-008-H-04 (protected) at para. 28, Vol. 12; Exhibit RR-2018-008-A-04 (protected) at para. 48, Vol. 12; Exhibit RR-2018-008-F-03 at para. 19, Vol. 11; Exhibit RR-2018-008-E-03 at paras. 8, 14, Vol. 11.

<sup>112</sup> According to the Domestic Extruders, a price difference of 10 percent or less, and sometimes as little as 1 to 2 percent, is enough for a customer to move their business to another supplier (see Exhibit RR-2018-008-B-03 at para. 25, Vol. 11; Exhibit RR-2018-008-G-03 at para. 14, Vol. 11; Exhibit RR-2018-008-I-03 at para. 28, Vol. 11; Exhibit RR-2018-008-D-03 at para. 11, Vol. 11; Exhibit RR-2018-008-H-03 at para. 27, Vol. 11).

<sup>113</sup> Exhibit RR-2018-008-C-03 at para. 21, Vol. 11; Exhibit RR-2018-008-I-03 at para. 30, Vol. 11; Exhibit RR-2018-008-G-03 at para. 31, Vol. 11; Exhibit RR-2018-008-B-03 at para. 40, Vol. 11; Exhibit RR-2018-008-D-03 at para. 29, Vol. 11.

continuation of the order, the Tribunal's assessment of the evidence on the record and its own analysis shows that they are reasonable projections.<sup>114</sup>

[97] Accordingly, the Tribunal finds that, if the order is rescinded, the dumping and subsidizing of the subject goods in both classes of goods is likely to cause significant adverse price effects, namely, price undercutting and price depression<sup>115</sup>, over the next 24 months.

### **Likely Impact of the Dumped and Subsidized Goods on the Domestic Industry**

[98] The Tribunal will now assess the likely impact of the above volumes and prices on the domestic industry should the order be rescinded, taking into consideration the recent performance of the domestic industry.<sup>116</sup> In this analysis, the Tribunal distinguishes the likely impact of the dumped and subsidized goods from the likely impact of any other factors affecting or likely to affect the domestic industry.<sup>117</sup>

#### Recent Performance of the Domestic Industry

##### - Custom Shapes

[99] As attested by the investigation report data, virtually all indicators relating to the performance of the domestic industry producing custom-shaped aluminum extrusions improved over the POR.<sup>118</sup> For example, total production increased by 7 percent in 2017, by 11 percent in 2018 and by 3 percent in interim 2019 as compared to interim 2018. Production for both domestic and export sales contributed to this increase, although the increase in production was more pronounced for export sales than it was for domestic sales. As the increase in practical plant capacity essentially mirrored the increase in total production, capacity utilization remained relatively flat, increasing from 65 percent in 2016 to 66 percent in 2018 and remaining at this level in interim 2019.

[100] Domestic sales from domestic production increased by 2 percent in 2017, by 8 percent in 2018 and by 4 percent in interim 2019 as compared with interim 2018. The domestic industry's market share ranged from a low of 70 percent in 2017 to a high of 77 percent in interim 2019. For their part, export sales increased by 21 percent in 2017, by 16 percent in 2018 and by 2 percent in interim 2019 as compared to interim 2018.

[101] In addition, the number of employees, hours worked and wages paid—both for direct and indirect employment—increased throughout the POR. As for productivity on a per-employee and per-hour-worked basis, there was a decrease of 5 percent for both in 2017 and an increase of 2 and 1 percent, respectively, in 2018. Investments totalling approximately \$80 million were made over the POR (excluding interim 2019).

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<sup>114</sup> In Expiry Review No. RR-2013-003, the Tribunal also considered an estimate of a 10 percent price reduction for both classes of goods to be reasonable (see *Aluminum Extrusions Review* at paras. 132, 136).

<sup>115</sup> The Tribunal notes that the issue of price suppression was not raised by the Domestic Extruders.

<sup>116</sup> See paragraphs 37.2(2)(c), (e) and (g) of the *Regulations*.

<sup>117</sup> See paragraph 37.2(2)(k) of the *Regulations*.

<sup>118</sup> See Exhibit RR-2018-008-05.03, Tables 2, 8, 9, 18, 19, Vol. 1.1. Tables 18 and 19 do not include data from Pexal.

[102] On a consolidated basis, the domestic industry's financial performance was generally positive over the POR as it remained profitable throughout.<sup>119</sup> Gross margins for domestic sales rose throughout the POR, both at the aggregate and per unit levels, with the increase in interim 2019 being significantly greater. Net income, both at the aggregate and per unit levels, decreased somewhat in 2017, remained stable in 2018 and increased significantly in interim 2019 as compared to interim 2018. It must be noted that the decrease in net income was attributable to a significant jump in financial expenses in 2017 and 2018 related to a domestic producer's corporate restructuring and foreign exchange losses.

[103] The above positive trends appear to have been driven in part by the domestic industry being able to increase sales in a growing market, maintain market share despite an increase in imports from non-subject countries, and by the improvement in prices in every period of the POR.

- Standard Shapes

[104] The domestic industry producing standard-shaped aluminum extrusions did not fare as well with a number of performance indicators deteriorating over the POR.<sup>120</sup> For example, total production declined by 1 percent in 2017 and 2018, and declined a further 6 percent in interim 2019 as compared to interim 2018. Production for both domestic and export sales were relatively stable in 2017 and 2018 as the declines hovered around 1 to 2 percent. However, production for export sales decreased by 29 percent in interim 2019 as compared to interim 2018.<sup>121</sup> These decreases, combined with increases in practical plant capacity over the POR, resulted in capacity utilization rates dropping from 10 percent in 2016 to 8 percent in interim 2019.

[105] Domestic sales from domestic production remained fairly stable throughout the POR, although the domestic industry's market share fell from 26 percent in 2016 to 20 percent in 2019. On the other hand, while export sales stayed essentially the same from 2016 to 2018, they dropped by 28 percent in interim 2019 as compared to interim 2018. This reduction in export sales, as compared to a modest increase for export sales of custom-shaped aluminum extrusions during the same period, appears to be the result of a few domestic producers having reduced export sales for both classes of goods, but who account for a larger proportion of exports of standard-shaped aluminum extrusions.<sup>122</sup>

[106] As for number of employees, hours worked and wages paid—both for direct and indirect employment—all generally increased throughout the POR, with only the number of employees and hours worked for indirect employment falling by 1 percent in interim 2019 as compared to interim 2018. In contrast, productivity on a per employee and per hour worked basis, decreased throughout the POR. Investments totalling approximately \$61 million were made over the POR (excluding interim 2019).

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<sup>119</sup> Exhibit RR-2018-008-05.03, Table 15, Vol. 1.1; Exhibit RR-2018-008-06.03 (protected), Table 15, Vol. 2.1. The financial results do not include data from Apex and Pexal.

<sup>120</sup> See Exhibit RR-2018-008-05.02, Tables 2, 8, 9, 18, 19, Vol. 1.1. Tables 18 and 19 do not include data from Pexal.

<sup>121</sup> It is worth noting that production volumes for standard-shaped aluminum extrusions are fairly low such that relatively small decreases in production volumes can appear large when expressed in percentage terms.

<sup>122</sup> These domestic producers' reduced export sales appear to be attributable, at least in part, to the section 232 measures (see Exhibit RR-2018-008-G-03 at para. 25, Vol. 11).

[107] On a consolidated basis, the domestic industry's financial performance related to domestic sales was generally positive over the POR as it remained profitable throughout.<sup>123</sup> Gross margins and net income, both at the aggregate and per unit levels, followed the same pattern of an increase in 2017, followed by a decrease in 2018 and then a significant increase in interim 2019 as compared to interim 2018. For net income, the decrease in 2018 and the increase in interim 2019 were particularly large due to an equally large and temporary jump in financial expenses in 2018, also related to a domestic producer's corporate restructuring and foreign exchange losses.

[108] The above negative trends were likely driven by the domestic industry's inability to increase sales to maintain its share of a growing market while the positive trends were likely due to the improvement in prices in every period of the POR.

- Conclusion

[109] From the foregoing evidence, it is clear that the order was beneficial to the domestic industry for each class of goods as their margins generally improved and they remained profitable throughout. Indeed, according to the Domestic Extruders, the order allowed them to retain customers, increase or maintain domestic sales, increase employment and, most importantly, make significant investments in their operations and facilities.<sup>124</sup>

[110] However, the issue that must be addressed is whether the domestic industry is likely to continue to perform within an acceptable range if the order is rescinded. For the reasons that follow, the Tribunal finds that neither the domestic industry producing custom-shaped aluminum extrusions nor that producing standard-shaped aluminum extrusions is likely to maintain its recent level of performance should the order be rescinded. In fact, the evidence demonstrates that, without the protection offered by anti-dumping and countervailing duties, both domestic industries would likely be materially injured by the resumed dumping and subsidizing of the subject goods.

Likely Impact on the Domestic Industry if the Order Is Rescinded

[111] The Domestic Extruders submitted that, if the order is rescinded, it is likely that Chinese producers and exporters will immediately resume selling aluminum extrusions in the Canadian market at low prices, resulting in lost sales and price erosion, thereby causing material injury to the domestic industry in the form of reduced margins, reduced capacity utilization, layoffs, reduced return on investment and foregone investments.

[112] The Tribunal has already found that, if the order is rescinded, the subject goods in both classes of goods will likely undercut domestic producers' selling prices by 25 percent or more and that, as a result, domestic pricing will, as submitted by the Domestic Extruders, decrease by a minimum of 10 percent in the 12 months following the rescission of the order in order to maintain minimum levels of production and sales.

[113] The Domestic Extruders estimated the impact that such a 10 percent reduction in domestic prices would have on the domestic industry's profitability by applying that percentage reduction to

<sup>123</sup> Exhibit RR-2018-008-05.02, Table 15, Vol. 1.1; Exhibit RR-2018-008-06.02 (protected), Table 15, Vol. 2.1. The financial results do not include data from Apex and Pexal.

<sup>124</sup> See, for example, Exhibit RR-2018-008-C-03 at paras. 14-15, Vol. 11; Exhibit RR-2018-008-G-03 at para. 18, Vol. 11; Exhibit RR-2018-008-D-03 at para. 16, Vol. 11; Exhibit RR-2018-008-A-03 at paras. 51-52, 56-57, Vol. 11; Exhibit RR-2018-008-E-04 (protected) at para. 10, Vol. 12.

the domestic industry's financial results for the POR. According to them, a 10 percent decline in net sales value, without adjusting costs, expenses or production volume, would have resulted in net losses in all periods for both classes of goods.<sup>125</sup>

[114] The Tribunal undertook the same exercise and found that a 10 percent decline in net sales value over the POR would have resulted in a reduction in gross margins ranging from 61 to 73 percent for custom-shaped aluminum extrusions and from 66 to 96 percent for standard-shaped aluminum extrusions, as well as substantial net income losses in all periods for both classes of goods. The Tribunal also found that even a more conservative 5 percent decline in net sales value over the POR would have resulted in a reduction in gross margins ranging from 30 to 37 percent for custom-shaped aluminum extrusions and from 33 to 48 percent for standard-shaped aluminum extrusions. It would also have resulted in a reduction in net income ranging from 59 to 89 percent for custom-shaped aluminum extrusions and in net income losses in all periods for standard-shaped aluminum extrusions.

[115] In light of the above, the Tribunal is of the view that the reduction in domestic prices that would result from the rescission of the order, whether that reduction be 5 or 10 percent, would have a significant negative impact on the financial performance of the domestic industry for each class of goods, thereby causing what the Tribunal considers to be material injury. Thus, the threshold of materiality is met even before the negative impact of any lost sales volume is considered. In any event, given the magnitude of the expected level of price undercutting and likely import volumes of the subject goods, significant volumes of domestic sales, and hence production, would likely be displaced by sales of subject goods.<sup>126</sup> This would predictably lead to lower capacity utilization rates, lost market share, higher unit costs and further reduced margins, thereby exacerbating the injury experienced by the domestic industry and potentially placing certain domestic producers' operations at risk.

[116] There is also an abundance of evidence on the record from both the Domestic Extruders and the USW that lost sales and price erosion would cause injury to the domestic industry in the form of decreased employment and would lead to a reduction or postponement of currently planned investments, thereby prejudicing the domestic industry's ability to remain competitive against, and making it even more vulnerable to injury from, the subject goods.<sup>127</sup> The Tribunal finds this evidence to be credible and compelling.

[117] In light of the foregoing, the Tribunal finds that, if the order is rescinded, the dumping and subsidizing of the subject goods is likely to cause material injury to the domestic industry for each class of goods.

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<sup>125</sup> Exhibit RR-2018-008-A-02 (protected) at paras. 242-243, Vol. 12.

<sup>126</sup> There is evidence that domestic producers' sales volume would decline, in some cases by up to 30 percent or more, following the rescission of the order (see, for example, Exhibit RR-2018-008-B-03 at para. 43, Vol. 11; Exhibit RR-2018-008-E-03 at para. 21, Vol. 11; Exhibit RR-2018-008-F-03 at paras. 41-42, Vol. 11; Exhibit RR-2018-008-H-04 (protected) at para. 30, Vol. 12).

<sup>127</sup> Exhibit RR-2018-008-C-03 at para. 24, Vol. 11; Exhibit RR-2018-003-D-03 at para. 33, Vol. 11; Exhibit RR-2018-008-E-04 (protected) at para. 20, Vol. 12; Exhibit RR-2018-008-G-03 at paras. 19, 39, Vol. 11; Exhibit RR-2018-008-H-04 (protected) at para. 31, Vol. 12; Exhibit RR-2018-008-I-03 at para. 39, Vol. 11; Exhibit RR-2018-008-K-01 at paras. 18-20, Vol. 11; Exhibit RR-2018-008-K-03 at para. 24, Vol. 11; Exhibit RR-2018-008-K-05 at para. 14, Vol. 11.

### Factors Other than the Dumping and Subsidizing

[118] Pursuant to paragraph 37.2(2)(k) of the *Regulations*, the Tribunal may consider any other factors that are relevant in the circumstances. While no such factors were explicitly identified by the Domestic Extruders, and given the lack of any submissions opposing the continuation of the order, the Tribunal, on its own initiative, considered whether there were some factors unrelated to the dumping and subsidizing of the subject goods that could adversely affect the domestic industry in the next 24 months. The Tribunal ensured not to attribute the effects of such factors to an eventual rescission of the order.

[119] The Tribunal first considered whether the replacement of higher-priced imports from the United States with lower-priced imports from non-subject countries other than the United States<sup>128</sup> could have an adverse effect on the domestic industry producing each class of goods over the next 24 months. In this regard, the Domestic Extruders did mention that they would remain in a vulnerable position in the near to medium term due to continued low-priced imports from such countries.

[120] Data from the Tribunal's investigation reports show that, over the POR, the share of total imports represented by imports from non-subject countries other than the United States increased from 33 to 69 percent for custom-shaped aluminum extrusions and from 19 to 34 percent for standard-shaped aluminum extrusions.<sup>129</sup> Conversely, the share of total imports represented by imports from the United States decreased from 55 to 28 percent and from 81 to 66 percent, respectively for each class of goods. A similar trend is observed with respect to the share of the market held by imports from the United States and other non-subject countries for both classes of goods.<sup>130</sup>

[121] The Tribunal was faced with the same issue in Expiry Review No. RR-2013-003 and found that the market share held by low-priced imports from non-subject countries would likely decrease if the findings were rescinded given that it had already found that the subject goods would enter the Canadian market in large volumes and at prices that were likely to be below the prices of aluminum extrusions from the low-priced countries.<sup>131</sup> While the Tribunal did recognize the potential injury that could result from such low-priced imports in the near to medium term, it did not consider that such potential injury eliminated injury attributable to the likely volumes and prices of the subject goods that would enter the Canadian market if the findings were rescinded.<sup>132</sup> There is nothing to suggest that it would be inappropriate for the Tribunal to adopt this line of reasoning in the context of the present expiry review and it therefore reaches the same conclusion as it did in 2014.

[122] The Tribunal also notes that, while the shift in the source of imports and sales from imports operated over the POR, the greatest change took place in interim 2019. This is most assuredly due to Canada's retaliatory tariffs imposed in response to the section 232 measures. However, given the agreement reached between the United States and Canada on May 17, 2019, there is likely to be a

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<sup>128</sup> Average purchase prices of imports from the United States were higher than average import prices for other non-subject countries in all periods of the POR for both classes of goods (see Exhibit RR-2018-008-05.03, Table 11, Vol. 1.1; Exhibit RR-2018-008-05.02, Table 11, Vol. 1.1).

<sup>129</sup> Exhibit RR-2018-008-05.03, Table 5, Vol. 1.1; Exhibit RR-2018-008-05.02, Table 5, Vol. 1.1.

<sup>130</sup> Exhibit RR-2018-008-05.03, Table 9, Vol. 1.1; Exhibit RR-2018-008-05.02, Table 9, Vol. 1.1.

<sup>131</sup> *Aluminum Extrusions Review* at para. 167.

<sup>132</sup> *Aluminum Extrusions Review* at para. 168.

reversal, or at the very least a partial reversal, of this trend even before the impact of the likely volumes and prices of the subject goods is taken into consideration.

[123] The Tribunal next considered the impact of expected flat economic conditions, in both the aluminum extrusion market and global economy as a whole, on the domestic industry. However, there is no evidence on the record which indicates that such economic conditions would have a disproportionate impact on the domestic industry or that they would constitute a cause of material injury in the next 24 months. In any event, the Tribunal is of the view that, if the order is rescinded, the likely injury to the domestic industry resulting from the dumping and subsidizing of the subject goods will be over and above any other injury that may be caused by poor economic conditions that would affect all market participants.

[124] Finally, the Tribunal considered the domestic industry's likely export performance over the next 24 months. Bearing in mind that the section 232 measures no longer apply to Canadian exports of aluminum products to the United States, and having considered the evidence on the domestic industry's historical export performance, there is insufficient information for the Tribunal to conclude that, should the order be rescinded, the likely poor performance of the domestic industry producing each class of goods could be attributed to an eventual inability to maintain adequate export sales.

[125] Having accounted for the impact of the above factors and ensured not to attribute their effects to an eventual rescission of the order, the Tribunal finds that the resumption of the dumping and subsidizing of the subject goods will likely result, in and of itself, in material injury to the domestic industry for both custom-shaped and standard-shaped aluminum extrusions over the next 24 months.

## **DETERMINATION**

[126] Pursuant to paragraph 76.03(12)(b) of *SIMA*, the Tribunal hereby continues its order in respect of the subject goods.

Georges Bujold

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Georges Bujold

Presiding Member

Serge Fréchette

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Serge Fréchette

Member

Randolph W. Heggart

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Randolph W. Heggart

Member