MINISTRY OF BUSINESS, INNOVATION & EMPLOYMENT
HĪKINA WHAKATUTUKI

TRADE AND INTERNATIONAL

Trade Safeguard Investigation Application

Trade (Safeguard Measures) Act 2014

ALUMINIUM EXTRUSIONS:

HOLLOW PROFILES AND OTHER

THAN HOLLOW PROFILES

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New Zealand Government

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1. Important Notes

1. An Application may be made by any person. An Application must include information about whether the applicant is a producer in the domestic industry and must include as much information as is reasonably possible about:

   - The level of support (if any) from domestic industry producers (apart from the applicant if the applicant is a producer in the domestic industry); and
   - The names of domestic industry producers; and
   - Details of the volume and value of the domestic industry's production of the like goods or directly competitive goods in New Zealand by (i) the applicant; and (ii) the other domestic industry producers.

   Domestic industry means New Zealand producers who produce goods that are 'like', or 'directly competitive', with the imported goods to which the Application relates. The domestic industry can consist of:

   - All such New Zealand producers; or
   - Those New Zealand producers whose collective production constitutes a major proportion of the production in New Zealand of like or directly competitive goods.

2. **Like goods**, in relation to imported goods are defined as goods that are like the imported goods in all respects or in their absence, goods which have characteristics that closely resemble those goods. **Directly competitive goods**, in relation to imported goods, means goods that, as a matter of fact and commercial common sense, are substitutable for the imported goods.

3. An Application must contain evidence that increased imports have caused or threaten to cause **serious injury** to the domestic industry. Serious injury means a significant overall impairment in the position of a domestic industry.

4. A safeguard investigation will usually be completed in 75 working days or 85 working days if provisional measures have been requested. A safeguard is usually applied in the form of a duty and can only be imposed for a maximum of 4 years (although this can be extended for a further 4 years in certain circumstances).

5. All interested parties are entitled to access all information relevant to a safeguard investigation which is not considered confidential. All submissions provided during an investigation must therefore be accompanied by a non-confidential summary so that it can be made available to all other interested parties.

6. The industry should provide a combined Application, that is, provide the information requested in this questionnaire to present the position of the industry, as well as providing the information separately for the individual producers who have provided injury information in support of the Application. If producers are concerned about sharing their information with other producers you may need an independent party to

co-ordinate and combine the data. Alternatively, each producer can send their information directly to the Ministry and we will combine it.

7. For more information, please contact the Trade Remedies team at TradeRemedies@mbie.govt.nz .

2. The Applicant

2.1. The Applicant is the Aluminium Extruders Association of New Zealand (ALENZ), representing the New Zealand Industry Manufacturing Aluminium Extrusions (Hollow Profiles and Other than Hollow Profiles) domestically.

The industry is made up of five independent companies as follows:

- **Independent Extrusions Limited (INEX)**:
- **Altus NZ Ltd (Altus)**:
- **McKechnie Aluminium Solutions Limited (McKechnie)**:
- **Aluminium Extrusion Company Limited (ALEXCO)**:
- **Vulcan Ullrich Aluminium NZ Limited (VULCAN).**

2.2. The industry is represented for the purposes of this Application by the Aluminium Extruders Association of New Zealand (ALENZ).

[redacted]
[Personal information]
[redacted]

2.3. For the purposes of this Application information is being supplied by INEX, Altus and McKechnie whose combined production of like or directly competitive goods is around 65% of total domestic production. Letters of support have been provided by the other members of ALENZ, viz ALEXCO and VULCAN (**Appendix 1**).

3. Description of Imported Goods

3.1. The imported goods are described as:

Aluminium extrusions produced via an extrusion process, of alloys having metallic elements falling within the alloy designations published by The Aluminium 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, anodised or painted or otherwise coated, whether or not worked….

3.2. The goods under consideration include aluminium extrusion products that have been further processed or fabricated to a limited extent, after aluminium has been extruded through a die. For example, aluminium extrusion products that have been worked (e.g. precision cut, machined, punched or drilled) fall within the scope of the goods. The goods under consideration do not extend to intermediate or finished products that are processed or fabricated to such an extent that they no longer possess the nature and physical characteristics of an aluminium extrusion, but have become a different product.

3.3. The goods are classified in the New Zealand Customs Service Working Tariff Document as follows:

76.04			Aluminium bars, rods and profiles:
			- Of aluminium alloys:
7604.21.00	00B	kg	- - Hollow profiles
7604.29			- - Other
7604.29.09	OOF	kg	- - - Other

4. Provisional Safeguard Duty

4.1. We are seeking the imposition of a provisional safeguard duty.

4.2. We submit that provisional measures are necessary on the grounds that delay would cause further serious injury to the domestic industry that would be difficult to repair.

4.3. The profitability and future viability of New Zealand's aluminium extruders is threatened by imports of industrial/geometric shapes which are arriving in New Zealand at a cost significantly below best manufactured cost in the country of origin. Orders to existing customers continue to be lost to imported products.

5. New Zealand Producers

5.1. The industry manufacturing aluminium extrusions consists of the following independent companies:

- **McKechnie Aluminium Solutions Limited**: Taranaki-based, the company is a pioneer of aluminium extrusion in New Zealand. McKechnie has expert capabilities in die design and development, aluminium extrusion, surface finishing (anodising and powder coating), and fabrication. McKechnie is the first aluminium extruder to achieve third-party Toitū carbonreduce product certification by Enviro-Mark Solutions Ltd in their end-of-life/reuse and recycling

operation. The company's shareholder is a New Zealand company whose ultimate holding company is based in the United States.

- **Independent Extrusions Limited (INEX)**: Independent Extrusions Limited (INEX) is an acknowledged leader in the aluminium extrusion industry. INEX supplies custom-designed and generic extruded aluminium to the manufacturing and fabrication industries throughout New Zealand and Australia. The company is 100% New Zealand owned.

- **Altus NZ Ltd**: Altus is a leading New Zealand-owned and operated manufacturer and exporter of innovative designs in aluminium extrusions and extrusion-based building systems. The company has a combination of New Zealand and Australian shareholders.

- **Aluminium Extrusion Company Limited (ALEXCO)**: Wellington based, it is a precision extruder specialising in manufacturing small-to-medium profile aluminium extrusions. It offers a full end-to-end service including in-house design and development, extrusions, mill, anodising and powder coating. The company is 100% New Zealand owned.

- **VULCAN Ullrich Aluminium NZ Limited (VULCAN):** The company offers a wide range of aluminium solutions for various industries including manufacturing, construction, infrastructure, transport and agriculture. Key offerings include aluminium productions including extrusions, processing capabilities, building systems and distribution. The company has a combination of New Zealand and Australian shareholders.

5.2. There are no New Zealand producers of like or directly competitive goods who do not support the Application.

6. Summary of NZ Producers

6.1. The volume and value of the domestic industry's domestic production of like or directly competitive goods for the most recent financial year is detailed in Figure 1.

Figure 1: Level of Support from Domestic Producers for Application

FY2025	Ex-factory Value ($)	Quantity (kg)
Producers who support the Application • INEX • McKechnie • Altus • AlexCo • Vulcan	[redacted]	[redacted]
Other Producers *(please list)*: NIL		
Total New Zealand Industry		

% Support from Industry: 100%		

7. Domestically Manufactured Goods

7.1. The goods produced by the Applicant that are like or directly competitive with the imported goods are described as follows:

Aluminium extrusions produced via an extrusion process, of alloys having metallic elements falling within the alloy designations published by The Aluminium Association commencing with 1, 2, 3, 5, 6 or 7 (or proprietary or other certifying body equivalents), with the finish being as extruded (mill) as described as industrial/geometric shapes.

Details are contained in **Appendix 2.**

7.2. The goods produced by the New Zealand industry are like or directly competitive with the imported goods in the following respects:

- **Method of Manufacture**:

Aluminum extrusion manufacture is a metal forming process that uses hydraulic force to push heated aluminum alloy material through a steel die to create specific cross-sectional profiles. Extruded aluminium alloys are versatile metal profiles (alloyed with elements like magnesium, silicon, copper) creating continuous shapes with excellent strength, corrosion resistance, and light weight.

The Extrusion Process:

- Billet Preparation: Aluminum alloy billet is heated.
- Pressing: Billet is forced through a shaped die by a hydraulic ram.
- Cooling and Straightening: Extrusion is quenched (cooled) and stretched to correct twists.
- Finishing: Can be tempered (T5/T6) for further strength

- **Physical Characteristics:**

Aluminium extrusions will be in standard lengths (commonly the length of the shipping container in which they are shipped).

- **End Use:**

Aluminium extrusions are principally used in construction, marine and transport industries.

- **Marketing and Distribution Channels:**

Aluminium extrusions are sold through retail outlets, trade warehouses. Web based marketing is common with web-based product catalogues.

- **In the case of directly competitive goods, how the imported goods are substitutable for the New Zealand produced goods:**

The vast bulk of extrusions are generic shapes. Some examples are (but not limited to) Angles, Channels, Flats, Half Rounds, Hollow Squares / Rectangles, I Beams, Rounds, Squares, Hexagons, Tees, Extruded Tubes, Zeds, Top Hats

8. Production Volumes of the Domestic Industry and the NZ Market

8.1. Introduction

Aluminium Extrusion manufacturing in New Zealand is a $600m industry suppling supplying an estimated $2billion customer base in New Zealand across building/construction, marine, transport and manufacturing/fabrication.

New Zealand extruders are regional businesses with over 95% of aluminium extrusion production capacity in Waikato and Taranaki regions. Our members employ almost 2,000 people directly and indirectly support over 6,000 jobs in our suppliers and downstream customers across principally the building and construction, transport and marine sectors. Many of our customers use unique New Zealand extrusions to manufacture high value exports across engineering, medical and infrastructure.

8.2. The aluminium extrusion market in New Zealand is segmented into the following:

- Fenestrations – extrusions designed/manufactured specifically for proprietary window/door systems
- Industrial/ geometric shapes – squares, rectangles, angles etc, including other exclusive shapes with IP in design owned by the customer.

8.3. As referred to in paragraphs 3.1 (Imported Goods) and 7.1 (Domestically Manufactured Goods) it is the industrial/geometric shapes segment of the market which is relevant for this Application. Within that segment of the market will be “other exclusive shapes with IP in design owned by a customer”.

By adjusting for exports and imports (on the assumption that they are all industrial/geometric shapes) the calculation of the market segments in New Zealand has been made.

8.4. Domestic Production is summarised below in Figure 2.

Figure 2: Domestic Production

[redacted]

9. Increase in Imports

9.1. Under trade agreements with Australia and Singapore, New Zealand cannot impose a safeguard measure on imports which originate from those countries. Our assessment of the extent to which imports have increased have therefore excluded imports from Australia and Singapore.

9.2. Figure 3 summarises imports since 2022 (sourced from Statistics New Zealand) and the relationship with domestically produced goods and the total New Zealand market, as well as relative changes in levels since 2022.

Figure 3 : Imports

	Period ended 31/12/22		**Period ended 31/12/23**		**Period ended 31/12/24**		**Period ended 31/10/25**	
	Qty (kg)	Value (NZD)	Qty (kg)	Value (NZD)	Qty (kg)	Value (NZD)	Qty (kg)	Value (NZD)
Total imports	8,834,032	62,636,873	7,573,018	53,016,901	8,163,054	62,168,719	6,019,265	48,557,372
Imports from Australia and Singapore	1,138,026	8,853,457	955,440	7,462,257	480,193	12,576,481	264,985	6,708,475
Imports from all countries excluding Australia and Singapore	**7,696,006**	**53,783,416**	**6,617,578**	**45,554,644**	**7,682,861**	**49,592,238**	**5,754,280 (6,277,396) (pro rata)**	**41,848,897 (45,653,342) (pro rata)**
NZ industry production of like or directly competitive goods for domestic sale			[redacted]		[redacted]		[redacted]	
Total NZ market			[redacted]		[redacted]		[redacted]	

Imports from all countries excluding Australia and Singapore as % of NZ industry's production			[redacted]		[redacted]		[redacted]	
Imports from all countries excluding Australia and Singapore as % of total NZ market			[redacted]		[redacted]		[redacted]	
% change in imports from preceding period (excluding imports from Australia and Singapore)	4.1%	29.4%	(14%)	(15.3%)	16.1%	8.9%	(18.3%) (pro rata)	(7.95%) (pro rata)
% change in imports from 1st period (excluding imports from Australia and Singapore).	-	-	(14%)	(15.3%)	(0.17%)	(7.8%)	(18.43%)	(15.1%)

9.3. The import statistics contained in Figure 3 are subject to review with the New Zealand Customs Service. We have concerns that some of the imports identified as of Australian origin are in fact Chinese product transhipped through Australia.

9.4. Section 5 of the Act defines **increased imports** as "increased imports of goods into New Zealand, whether it is an absolute increase or a relative increase as compared with the amount of like goods or directly competitive goods produced in New Zealand." Article 2.1 of the Safeguards Agreement, requires a determination that: *"A product is being imported into its territory in such increased quantities, absolute or relative to domestic production, and under such conditions as to cause or threaten serious injury to the domestic industry."*. The text then defines **absolute increase** as a significant increase in the total volume of imports; while **relative increase** means imports have grown faster than domestic production, increasing their market share.

9.5. The summary of imports above in the Application show that imports have decreased absolutely in quantity since the exceptionally high level of 2021. There are a variety of reasons for this including the effects of COVID, the resulting slow down in the New Zealand economy, increased inventories, reduced construction levels etc.

Following a reduction in imported volumes in 2023, volumes were restored in 2024. However the slowing New Zealand economy and lower construction activity meant

that increased inventories were created. This necessitated a slow down in orders in early 2025, reflected in lower import volumes.

However, imports have increased significantly relative to the growth of domestic production from [redacted] in 2023 to [redacted] in 2025 YTD. The share of the market held by imports has similarly increased from [redacted] to [redacted], a [redacted] increase in the level of market share held by imported products. The effect of the increased level of imported products in the market is reflected in the Financial Summaries provided by each of the three companies.

9.6 The surge in import volumes relative to domestic production volumes, outlined in Figure 3 have been caused by unforeseen developments.

The term "unforeseen developments" is not defined in the Act. Guidance for how this may be interpreted can be found in international precedents.

In *DS595 European Union – Safeguard Measures on Certain Steel Products*, the European Union applied the measures on the grounds that three unforeseen developments (increased global steel overcapacity, an increase in the use of trade restrictive and trade defence measures on steel, and the US Section 232 measures on steel) had resulted in an increase in imports of certain steel products into the EU market, and that the increase in imports was threatening the EU industry with serious injury.

In that case it was found that the existence of several unforeseen developments at the same time reinforced the finding of a logical connection between the increase in imports into the European Union, which was an attractive and major market for steel exports, and the identified unforeseen developments.

Further, "unforeseen" has been interpreted in international fora as meaning "unexpected" not "unforeseeable".

9.7. Unforeseen and unexpected developments that have resulted in an increase in imports of the subject goods relative to domestic production volumes include the following:

- New Zealand is now unique amongst our major trading partners in that there is no duty on imported aluminium extrusions.
- The ongoing effects of the disruption of trade arising from the COVID pandemic.
- President Trump's introduction of blanket tariffs on goods entering the United States including from countries operating without favourable state interventions, including from New Zealand's value-adding export sectors.
- EU raising Safeguard tariffs on imported Aluminium and steel from 25% to 50% in 2025.

- In 2026 the EU will be introducing a Carbon Border Adjustment mechanism which will effectively close the EU market to imports.
- Belief that specific Chinese manufacturers are focused on moving funds out of China
- Chinese government export incentives were paid to exporters up until November 2024
- New New Zealand players who have recently entered the aluminium distribution market.
- New examples of some importers advertising specific alloys, delivering a different alloy and supplying test certificates for a third alloy. Also test certificates dated on day of sale, whereas tests are conducted on the date of manufacture.
- The imposition of additional tariffs in the United States has resulted in significant diversion of Chinese exports to other markets. New Zealand has been the recipient of some of these exports.

9.8. With respect to the trade diverting consequences of the Trump tariffs imposed earlier in 2025, (**Appendix 3**) demonstrates clearly how volumes of aluminium extrusions into the United States have reduced significantly in 2025, when compared with 2024 volumes. Annualising 2025 volumes YTD August gives a projected 2025 volume of just over 1 million tonnes when compared with the 2024 volume of 2.3 million tonnes. This displaced volume has had to find another home, and we submit that some of this volume has been diverted to the New Zealand market.

10. Serious Injury or Threat of Serious Injury

10.1. ALENZ members manufacture aluminium extrusions which compete with imports which appear to have a unique and unfair advantage in the New Zealand market place. No other country, except Singapore has no duty on imported extrusions. Singapore has two extruders but the industry focus is more on precision, custom profiles, distribution and value added services rather than very large scale extrusion like Chinese mills. The Singapore market does not get targeted by Chinese producers.

To understand our international competitiveness, ALENZ has (since 2017) maintained a best manufactured cost model, manufactured in China and freighted to New Zealand. This is based on a similar model used by Australian Border Security which actively monitors imports across the Australian border. Globally the real cost of manufacturing aluminium extrusions is consistent. Aluminium billet is purchased on the London or Shanghai Metal Exchanges, plus nominal values for alloys, manufacturing costs (benchmarked against a surrogate which we believe is India) and nominal freight to New

Zealand. The alloy and manufactured costs have been static since 2017… there has been a small increase in freight around COVID times. Owing to variation in LME and in US / NZ dollar rates the landed costs over the last 8 years have fluctuated between a monthly low of NZD3.93 per kg of extrusion and a high of NZD7.26/kg. Suffice to say no New Zealand extruder (or Australian for that matter) can manufacture at these costs. However, it does provide insight into what product is being imported for.

10.2. Imports of aluminium extrusions (*like those manufactured in New Zealand)*, specifically tariff items 7604.21.00.00B (hollow profiles) and 7604.29.09.00F (other profiles), have increased significantly in volume in recent years, particularly from China, with a corresponding significant decrease in per unit (kg) values. Analysis of import shipment declarations has revealed that in 2021 imports from China of products like those manufactured in New Zealand which were significantly below best manufactured cost totalled 4.1% of aluminium extrusion imports. In 2022 this increased to 8.7%. In 2024 imports from China significantly below best manufactured cost amounted to 21% of all imports of aluminium extrusion products like those manufactured in New Zealand.

In the last three months of 2024, the average value of subject goods imported from China was $1.00 below the best manufactured cost in China. In eight of the last twelve months (to Oct 2025), the average value of subject goods, imported from China, was below best manufactured cost (**Appendix 4**).

10.3. **Price Effects**

The price effects of the imported goods specific to each of the three companies submitting information are contained in separate confidential **Appendices 5, 6 and 7**. There are consistent themes across all companies which are summarised below.

The three elements of price effects supporting this Application are summarised as follows:

(a) Price Undercutting

Price undercutting occurs where the imported goods are sold on the New Zealand market, at the relevant level of trade, at lower prices than comparable like (or directly competitive) goods manufactured by the New Zealand industry for sale on the New Zealand domestic market.

The Financial Summaries in Appendices 7, 8 and 9 show that all three companies are suffering price undercutting ranging from [redacted] to [redacted] over the period. The level of price undercutting has increased recently as imported product continues to enter the market at prices below the best manufactured cost.

Appendix 8 contains details of a recent consignment from China showing an into warehouse price of NZD6.44 per kg.

(b) Price Depression

Price depression occurs when the New Zealand industry's domestic selling prices are reduced because of the imports.

Domestic sales prices are affected by LME, MJP, Billet premium, Alloy premium and Market premium in USD converted to NZD exchange rate. So the average selling price each year reflects these factors. Therefore although the sales price may have increased, the margins have reduced.

(c) Price Suppression

Price suppression occurs when price increases that would otherwise have taken place do not occur because of the imports. This could mean, for example, that cost increases are not fully recovered.

All three companies have been unable to raise prices to a level that adequately recovers increasing costs. Energy cost increases ranging from 38% to 152% over the last four years have been experienced by ALENZ members, which has threatened the future viability of local manufacturing. Across all companies total costs are in excess of 90% of average ex-factory prices, and have been increasing, particularly energy costs.

10.4. **Economic Impact**

The economic impact of the imported goods specific to each of the three companies submitting information is contained in separate confidential Appendices 5, 6 and 7. It is not practical to endeavour to aggregate the numbers as each company has a different balance date. However, consistent themes are evident across all companies which are summarised below.

(a) Output

Figure 3 shows that the output of the New Zealand industry has declined from FY 2023 to FY 2025 by almost [redacted] tonnes, or [redacted].

(b) Sales

The Financial Summaries of all three companies as contained in Appendices 5, 6 and 7 demonstrate significant declines in sales volume and sales revenue. Revenue has of course risen over the period due to the partial recovery of significant increases internationally in import costs, for example increases in aluminium billet/alloy costs, coupled with the decline in the NZ currency against the US.

The decrease in sales volume and revenue is directly attributable to the

increased market share being taken by the imported products.

(c) Market Share

The domestic industry's share of the New Zealand market has declined from [redacted] in FY 2023 to [redacted] in FY 2025, which represents a decline of [redacted] in the level of domestic industry's market share.

(d) Profits

The individual company Financial Summaries all demonstrate a significant decline from FY 2023 to FY 2025 in earnings before interest and tax (EBIT). This is directly attributable to loss of business to imported products and having to compete at prices below best manufactured cost.

(e) Productivity

The individual Financial Summaries of all three companies demonstrate a significant reduction in productivity measured on production per full time worker. This reflects the decline in production volumes while the workforce has required to remain relatively stable.

(f) Employment

The individual Financial Summaries of all three companies demonstrate various levels of reduced employment caused by reduced production volumes resulting from the loss of business and market share to the imported products.

(g) Use of Production Capacity

Comments on the serious injury incurred by the industry in the individual Financial Summaries note the reduced use of production capacity as volumes decline in response to the increased imports.

(h) Other Adverse Effects

Other adverse effects suffered by the individual three companies are set out in the individual Financial Summaries (commentary on serious injury).

10.5. **Other Causes of Injury**

The rising cost of energy has impacted significantly on all manufacturing in New Zealand.

ALENZ members are doubly impacted as they rely on natural gas for heat of billet/dies prior to extruding the aluminium, and natural gas is used for heat tempering process, post extrusion - refer 2 above. Natural gas costs have more than doubled over the Application period.
Over the Application period energy costs for ALENZ members have increased by 38%, 60% and 152% respectively.

10.6. **Exports by the Industry**

Exports of aluminium extrusions by the domestic industry are summarised in **Appendix 9**. Over the Application period, exports have reduced by over [redacted] in value.

10.7. **Imports by the Industry**

There have been negligible imports of the subject goods by the domestic industry (**Appendix 10**).

11. Public Interest

11.1. **The likely effectiveness of a safeguard measure in assisting the domestic industry**

It should be noted that in the last five years ALENZ members have invested [redacted] in new plant and equipment.

The introduction of safeguard measures will provide local manufacturers with the time to

- successfully transition from natural gas to electricity.
- continue to invest in productivity improvements.
- better understand the changing global geopolitical situation and respond accordingly.

11.2. **Alternatives to a safeguard measure**

Anti-dumping and Countervailing measures, while potential alternative options to a safeguard measure, involve statutory timeframes that are commercially unacceptable for the situation confronting our members. Preparation time for an Application is also usually extended due to the difficulty of obtaining normal value and/or subsidy information in the market of the overseas supplier. As a result, the damage caused to the local industry while this process proceeds (a minimum of twelve months) may well lead to the demise of the industry.

11.3. **The likely effect of a safeguard measure on the market (including on consumers)**

The imposition of safeguard measures is unlikely to reduce the volume of aluminium extrusions consumed in the New Zealand market. Rather, pricing is likely to return to 2021 /2022 levels, restoring some profitability to local manufacturers.

A safeguard measure will enable the domestic industry to continue to supply the very specific needs of its customers. Domestic customers typically have small extrusion runs, frequent die changes, complex shapes, a large range of products, some product running at the edge of press capability just in time

delivery, low stock levels and limited capital. Transitioning to an import model would jeopardise their survival.

11.4. **New Zealand's international relations and trade goals**

The Application of safeguard measures will serve to reinforce New Zealand's position as a strong advocate for free and fair trade to grow our exports. It will also ensure that our local manufacturing is not destroyed by the unique geopolitical situation we currently find ourselves in. Some of our trading partners are taking the opportunity to export surplus extrusions to New Zealand, now that the United States, European and Australian marketplaces are less attractive owing to various tariffs and Safeguard actions.

11.5. **The strategic importance of the industry**

New Zealand extruders are regional businesses with over 95% of aluminium extrusion production capacity in the regions, specifically Waikato and Taranaki. Our members employ almost 2,000 people directly and indirectly support over 6,000 jobs in our suppliers and downstream customers across principally the building and construction, transport and marine sectors. Many of our customers use unique New Zealand extrusions to manufacture high value exports across engineering, medical and infrastructure. The industry achieves quality, productivity and recovery metrics that compare favourably with world best practice.

The strategic importance of a strong domestic industry is that it enables economic resilience and stability through employment, the creation of high quality and high paying jobs, GDP contribution and supply chain security. It reduces the reliance and dependency on imported products, and mitigates risks from volatile global markets and supply disruptions.

The domestic industry has sovereign capability, ie the ability to step up and supply the market in times of crises outside New Zealand's control vis disrupted trade routes through geopolitical tensions, pandemics, wharf strikes, piracy etc. The lack of a local industry would ripple through to the potential demise of other industries in New Zealand that rely on the reliable supply of aluminium extrusions.

12. Declaration

Trade (Safeguard Measures) Act 2014

Note: *The Application should be attached to the following declaration:*

I hereby apply for the initiation of an investigation into the imports of aluminium extrusions: Hollow Profiles and Other Than Hollow Profiles.

In support of this Application, I attach evidence meeting the requirements of sections 9(2) and 9(3) of the Act.

This Application is made by Aluminium Extruders of New Zealand Limited (ALENZ)

Signed:  [Personal information]

Position: **Chairman**

Date: **21 January 2026**

Aluminium Extrusion Company
(A division of Parkin Metal Moulding Company Limited)
P O Box 15063, Wellington, New Zealand
Telephone (64) (4) 388 1091 Facsimile (64) (4) 388 1191
www.alexco.co.nz

14/01/2026

[redacted]
Manager
Trade and Supply Chains
New Zealand Ministry of Business Innovation and Employment

By Email: [redacted]

Dear [redacted]

Application by ALENZ for Safeguard Action Against Imported Aluminium Extrusions

AlexCo is a member of the Aluminium Extruders Association of New Zealand (ALENZ). We are a Wellington based precision extruder specialising in manufacturing small to medium profile aluminium extrusions. We offer a full end-to-end service including in-house design and development, extrusions, mill annodising and powder coating. We are 100% New Zealand owned.

We support the application for a Safeguard Action against imported aluminium extrusions, lodged by ALENZ.

Your sincerely

[redacted] [Personal information]
Managing Director

19 January 2026

Appendix 1

[redacted]
Manager
Trade and Supply Chains
New Zealand Ministry of Business Innovation and Employment

By Email: [redacted]

Dear [redacted]

Application by ALENZ for Safeguard Action Against Imported Aluminium Extrusions

Vulcan is a member of the Aluminium Extruders Association of New Zealand (ALENZ). We are listed on the New Zealand and Australian stock exchanges and consequently have a combination of New Zealand and Australian shareholders.

We offer a wide range of Aluminium solutions for various industries including manufacturing, construction, infrastructure, transport and agriculture. Our Aluminium offerings include extrusions, processing capabilities, building systems, flat products supported by a national distribution network of our own branches.

We support the application for a Safeguard Action against imported Aluminium extrusions, lodged by ALENZ.

Yours faithfully,

[redacted]
NZ Leader
Vulcan [Personal information]
[redacted]

Appendix 2

Manufacturers' Catalogues

Vulcan: https://product.vulcan.co/nz/aluminium.html?page=1
AlexCo: https://store.alexco.co.nz/collections/all
McKechnie: https://www.mckechnie.co.nz/uploads/PDF/Mill-Run-Standards/McKechnie_Mill_Run_Standards_Catalogue_9.2.pdf

PDFs:
Altus Catalogue Geometics Shapes
Altus Catalogue Extruded Products
Inex Catalogue

Appendix 3

Standard Report – Imports

Current date: 12/03/2025 8:18 PM (Eastern Standard Time)

Country	China							
Time	**2022**		**2023**		**2024**		**2025 through August**	
Measures	Customs Value ($US)	Quantity 1	Customs Value ($US)	Quantity 1	Customs Value ($US)	Quantity 1	Customs Value ($US)	Quantity 1
Commodity								
7604210010 Aluminum Alloy Hollow Profiles, Heat Trtable Indst (kg)	3,282,765	583,170	3,808,327	793,366	6,370,428	923,273	1,379,553	195,456
7604210090 Aluminum Alloy Hollow Profiles, Nesoi (kg)	3,351,955	867,479	2,065,577	375,917	2,407,556	416,387	628,838	140,363
7604291010 Aluminum Alloy Prof, Heat-trtble Indstrl Not Hollw (kg)	1,396,160	151,986	516,003	46,134	302,160	37,384	331,295	39,357
7604291090 Aluminum Alloy Profiles Not Hollow, Nesoi (kg)	5,524,065	1,015,551	4,390,461	756,916	6,166,103	924,276	2,118,564	291,767
	13,554,945	**2,618,186**	**10,780,368**	**1,972,333**	**15,246,247**	**2,301,320**	**4,458,250**	**666,943**

TRADE SAFEGUARD INVESTIGATION APPLICATION
MANUFACTURER'S QUESTIONNAIRE

INDEPENDENT EXTRUSIONS LIMITED

This Questionnaire provides evidence that supports an Application for a Safeguard Action against the imported goods from all countries except Australia and Singapore.

The imported goods in question are:

> ***Aluminium extrusions produced via an extrusion process, of alloys having metallic elements falling within the alloy designations published by The Aluminium 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, anodised or painted or otherwise coated, whether or not worked….***
>
> **<u>For the purposes of calculating costs, the following are included on a per kg basis:</u>**
>
> **Landed cost per kg for aluminium log including alloy**
>
> **Adjustments for production scrap and credit for scrap sales.**
> **Extrusion processing costs per kg such as labour, consumables, R&M, energy costs, depreciation, die amortization.**
> **Press services expressed as a cost per kg such as die correction**

The description of "like goods" (ie those manufactured domestically) is as follows:

> ***Aluminium extrusions produced via an extrusion process, of alloys having metallic elements falling within the alloy designations published by The Aluminium Association commencing with 1, 2, 3, 5, 6 or 7 (or proprietary or other certifying body equivalents), with the finish being as extruded (mill) as described as industrial/geometric shapes.***

1. Company Details

Company	Independent Extrusions Limited
Contact Person	[redacted]
Contact Details	[redacted]

2. Goods Manufactured by your Company

Your Company's Production of Like or Directly Competitive Goods for Domestic Sale	YE 31/3/23		YE 31/3/24		YE 31/3/25		YTD 31/10/25 (7 months)	
	Qty (kg)	Ex-Factory Value (NZD)	Qty (kg)	Ex-Factory Value (NZD)	Qty (kg)	Ex-Factory Value (NZD)	Qty (kg)	Ex-Factory Value (NZD)
	[redacted]							

3. Goods Imported by Your Company

Subject Goods Imported by Your Company	FY 2022		FY 2023		FY 2024		FY 2025 (YTD)	
	Qty (kg)	FOB Value (NZD)	Qty (kg)	FOB Value (NZD)	Qty (kg)	FOB Value (NZD)	Qty (kg)	FOB Value (NZD)
[redacted]								

4. Like Goods Exported by Your Company

Subject Goods Exported by Your Company	FY 2022		FY 2023		FY 2024		FY 2025 (YTD)	
	Qty (kg)	Ex-Factory Value (NZD)	Qty (kg)	Ex-Factory Value (NZD)	Qty (kg)	Ex-Factory Value (NZD)	Qty (kg)	Ex Factory Value (NZD)
[redacted]								

5. Evidence of Serious Injury

5.1. Price Undercutting

Price undercutting occurs where the imported goods are sold on the New Zealand market, at the relevant level of trade, at lower prices than comparable like (or directly competitive) goods manufactured by the New Zealand industry for sale on the New Zealand domestic market.

Period	YE31/3/23	YE31/3/24	YE 31/3/25	YTD 10/25 (7months)
Your price per kg (FIS)	[redacted]	[redacted]	[redacted]	[redacted]
Price of the imported goods per kg (FIS)[1]	[redacted]	[redacted]	[redacted]	[redacted]
Amount of price undercutting	[redacted]	[redacted]	[redacted]	[redacted]
Price undercutting as % of your price	[redacted]	[redacted]	[redacted]	[redacted]

5.2. Price depression

Price depression occurs when the New Zealand industry's domestic selling prices are reduced because of the imports.

Period	YE 31/3/23	YE 31/3/24	YE 31/3/25	YTD 10/25 (7 months)
Average selling prices per kg net of discounts and rebates (FIS)	[redacted]	[redacted]	[redacted]	[redacted]

5.3. Price Suppression

Price suppression occurs when price increases that would otherwise have taken place do not occur because of the imports. This could mean, for example, that cost increases are not fully recovered.

Period	YE 31/3/23	YE 31/3/24	YE 31/3/25	YTD Oct 25 (7 mths)
Ex-Factory	[redacted]	[redacted]	[redacted]	[redacted]
Cost of production per kg	[redacted]	[redacted]	[redacted]	[redacted]
Selling and administration costs per kg	[redacted]	[redacted]	[redacted]	[redacted]
Total costs per kg	[redacted]	[redacted]	[redacted]	[redacted]

[1] Prices based on information provided by New Zealand Customs, CIF ex China (summary attached), plus $0.60 for FIS.

Total costs as % of average selling price	[redacted]	[redacted]	[redacted]	[redacted]

5.4. Injury Summary

Period	YE 31/3/23	YE 31/3/24	YE 31/3/25	YTD Oct 25 (7mths)
Output (MT)				
Sales Volume	[redacted]	[redacted]	[redacted]	[redacted]
Sales Revenue	[redacted]	[redacted]	[redacted]	[redacted]
Cost of Production	[redacted]	[redacted]	[redacted]	[redacted]
Gross Profit	[redacted]	[redacted]	[redacted]	[redacted]
Selling and Admin Expenses	[redacted]	[redacted]	[redacted]	[redacted]
Earnings Before Interest and Tax (EBIT)	[redacted]	[redacted]	[redacted]	[redacted]
Per Unit (kg)				
Sales Revenue	[redacted]	[redacted]	[redacted]	[redacted]
Cost of Production	[redacted]	[redacted]	[redacted]	[redacted]
Gross Profit	[redacted]	[redacted]	[redacted]	[redacted]
Selling and Admin Expenses	[redacted]	[redacted]	[redacted]	[redacted]
EBIT/kg	[redacted]	[redacted]	[redacted]	[redacted]

5.5. Cost of Production Summary

Per kg	YE 31/3/23	YE 31/3/24	YE 31/3/25	YTD OCT 25 (7 MTHS)
Variable costs (specify)				
Metal	[redacted]	[redacted]	[redacted]	[redacted]
Direct Labour	[redacted]	[redacted]	[redacted]	[redacted]
R&M	[redacted]	[redacted]	[redacted]	[redacted]
Packing	[redacted]	[redacted]	[redacted]	[redacted]
Energy	[redacted]	[redacted]	[redacted]	[redacted]
Fixed costs (specify)				
Die Costs	[redacted]	[redacted]	[redacted]	[redacted]
Other Overheads	[redacted]	[redacted]	[redacted]	[redacted]
Total Costs	[redacted]	[redacted]	[redacted]	[redacted]

5.6. Employment

Period	YE 31/3/23	YE 31/3/24	YE 31/3/25	YTD OCT 25 (7 MTHS)
Number of Employees at the end of the Period	[redacted]	[redacted]	[redacted]	[redacted]
Average Number of Employees for Each Period	[redacted]	[redacted]	[redacted]	

6. Commentary on Serious Injury

[redacted]

[redacted]

[redacted]

TRADE SAFEGUARD INVESTIGATION APPLICATION
MANUFACTURER'S QUESTIONNAIRE

MCKECHNIE ALUMINIUM SOLUTIONS LIMITED

This Questionnaire provides evidence that supports an Application for a Safeguard Action against the imported goods from all countries except Australia and Singapore.

The imported goods in question are:

> ***Aluminium extrusions produced via an extrusion process, of alloys having metallic elements falling within the alloy designations published by The Aluminium 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, anodised or painted or otherwise coated, whether or not worked….***
>
> **<u>For the purposes of calculating costs, the following should be included on a per kg basis:</u>**
>
> **Landed cost per kg for aluminium log including alloy**
>
> **Adjustments for production scrap and credit for scrap sales.**
> **Extrusion processing costs per kg such as labour, consumables, R&M, energy costs, depreciation, die amortization.**
> **Press services expressed as a cost per kg such as die correction**

The description of "like goods" (ie those manufactured domestically) is as follows:

> ***Aluminium extrusions produced via an extrusion process, of alloys having metallic elements falling within the alloy designations published by The Aluminium Association commencing with 1, 2, 3, 5, 6 or 7 (or proprietary or other certifying body equivalents), with the finish being as extruded (mill) as described as industrial/geometric shapes.***

1. Company Details

Company	McKechnie Aluminium Solutions Limited
Contact Person	[redacted]
Contact Details	[redacted]

2. Goods Manufactured by your Company

Your Company's Production of Like or Directly Competitive Goods for Domestic Sale	FY 2022 (Dec)		FY 2023 (Dec)		FY 2024 (Dec)		FY 2025 (YTD – Oct)	
	Qty (kg)	Ex-Factory Value (NZD)	Qty (kg)	Ex-Factory Value (NZD)	Qty (kg)	Ex-Factory Value (NZD)	Qty (kg)	Ex-Factory Value (NZD)
[redacted]								

3. Goods Imported by Your Company

Subject Goods Imported by Your Company	FY 2022 (Dec)		FY 2023 (Dec)		FY 2024 (Dec)		FY 2025 (YTD – Oct)	
	Qty (kg)	FOB Value (NZD)	Qty (kg)	FOB Value (NZD)	Qty (kg)	FOB Value (NZD)	Qty (kg)	FOB Value (NZD)
[redacted]								

4. Like Goods Exported by Your Company

Subject Goods Exported by Your Company	FY 2022 (Dec)		FY 2023 (Dec)		FY 2024 (Dec)		FY 2025 (YTD – Oct)	
	Qty (kg)	Ex-Factory Value (NZD)	Qty (kg)	Ex-Factory Value (NZD)	Qty (kg)	Ex-Factory Value (NZD)	Qty (kg)	Ex Factory Value (NZD)
[redacted]								

5. Evidence of Serious Injury

5.1. Price Undercutting

Price undercutting occurs where the imported goods are sold on the New Zealand market, at the relevant level of trade, at lower prices than comparable like (or directly competitive) goods manufactured by the New Zealand industry for sale on the New Zealand domestic market.

Period	FY 2022 (Dec)	FY 2023 (Dec)	FY 2024 (Dec)	FY 2025 (YTD - Oct)
Your price per kg (delivered to NZ customer)	[redacted]	[redacted]	[redacted]	[redacted]
Price of the imported goods per kg (FIS, Fabricator)	[redacted]	[redacted]	[redacted]	[redacted]
Amount of price undercutting	[redacted]	[redacted]	[redacted]	[redacted]
Price undercutting as % of your price	[redacted]	[redacted]	[redacted]	[redacted]

5.2. Price depression

Price depression occurs when the New Zealand industry's domestic selling prices are reduced because of the imports.

Period	FY 2022 (Dec)	FY 2023 (Dec)	FY 2024 (Dec)	FY 2025 (YTD – Oct)
Average selling prices per kg net of discounts and rebates (delivered to NZ customer)	[redacted]	[redacted]	[redacted]	[redacted]

5.3. Price Suppression

Price suppression occurs when price increases that would otherwise have taken place do not occur because of the imports. This could mean, for example, that cost increases are not fully recovered.

Period	FY 2022 (Dec)	FY 2023 (Dec)	FY 2024 (Dec)	FY 2025 (YTD - Oct)
Average selling prices per kg net of discounts and rebates (delivered to NZ customer)	[redacted]	[redacted]	[redacted]	[redacted]
Cost of production per kg	[redacted]	[redacted]	[redacted]	[redacted]
Selling and administration costs per kg	[redacted]	[redacted]	[redacted]	[redacted]
Total costs per kg	[redacted]	[redacted]	[redacted]	[redacted]
Total costs as % of average selling price	[redacted]	[redacted]	[redacted]	[redacted]

5.4. Injury Summary

Period	FY 2022 (Dec)	FY 2023 (Dec)	FY 2024 (Dec)	FY 2025 (YTD - Oct)
Output (kg)	[redacted]	[redacted]	[redacted]	[redacted]
Sales Volume	[redacted]	[redacted]	[redacted]	[redacted]
Sales Revenue	[redacted]	[redacted]	[redacted]	[redacted]
Cost of Production	[redacted]	[redacted]	[redacted]	[redacted]
Gross Profit	[redacted]	[redacted]	[redacted]	[redacted]
Selling and Admin Expenses	[redacted]	[redacted]	[redacted]	[redacted]
Earnings Before Interest and Tax (EBIT)	[redacted]	[redacted]	[redacted]	[redacted]
Per Unit (kg)				
Sales Revenue	[redacted]	[redacted]	[redacted]	[redacted]
Cost of Production	[redacted]	[redacted]	[redacted]	[redacted]
Gross Profit	[redacted]	[redacted]	[redacted]	[redacted]
Selling and Admin Expenses	[redacted]	[redacted]	[redacted]	[redacted]
EBIT/kg	[redacted]	[redacted]	[redacted]	[redacted]

5.5. Cost of Production Summary

	FY 2022 (Dec)	FY 2023 (Dec)	FY 2024 (Dec)	FY 2025 (YTD - Oct)
Costs (specify)				
Metal	[redacted]	[redacted]	[redacted]	[redacted]
Labour	[redacted]	[redacted]	[redacted]	[redacted]
R&M	[redacted]	[redacted]	[redacted]	[redacted]
Energy	[redacted]	[redacted]	[redacted]	[redacted]
Tooling	[redacted]	[redacted]	[redacted]	[redacted]
Other	[redacted]	[redacted]	[redacted]	[redacted]
Depreciation	[redacted]	[redacted]	[redacted]	[redacted]

5.6. Employment

Period	FY 2022 (Dec)	FY 2023 (Dec)	FY 2024 (Dec)	FY 2025 (YTD - Oct)
Number of Employees at the end of the Period	[redacted]	[redacted]	[redacted]	[redacted]
Average Number of Employees for Each Period	[redacted]	[redacted]	[redacted]	[redacted]

6. Commentary on Serious Injury

[redacted]

- [redacted]
- [redacted]
- [redacted]
- [redacted]
  - [redacted]
  - [redacted]
  - [redacted]
  - [redacted]
  - [redacted]
  - [redacted]
  - [redacted]
- [redacted]

[redacted]

- [redacted]

Anecdotal Evidence from [redacted] with Respect to Imported Aluminium Extrusions

[redacted]

[redacted]

[redacted]

[redacted]

TRADE SAFEGUARD INVESTIGATION APPLICATION
MANUFACTURER'S QUESTIONNAIRE

ALTUS NEW ZEALAND LIMITED

This Questionnaire provides evidence that supports an Application for a Safeguard Action against the imported goods from all countries except Australia and Singapore.

The imported goods in question are:

> ***Aluminium extrusions produced via an extrusion process, of alloys having metallic elements falling within the alloy designations published by The Aluminium 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, anodised or painted or otherwise coated, whether or not worked….***
>
> **<u>For the purposes of calculating costs, the following should be included on a per kg basis:</u>**
>
> **Landed cost per kg for aluminium log including alloy.**
>
> **Adjustments for production scrap and credit for scrap sales.**
> **Extrusion processing costs per kg such as labour, consumables, R&M, energy costs, depreciation, die amortization**
> **Press services expressed as a cost per kg such as die correction**

The description of "like goods" (ie those manufactured domestically) is as follows:

> ***Aluminium extrusions produced via an extrusion process, of alloys having metallic elements falling within the alloy designations published by The Aluminium Association commencing with 1, 2, 3, 5, 6 or 7 (or proprietary or other certifying body equivalents), with the finish being as extruded (mill) as described as industrial/geometric shapes.***

1. Company Details

Company	Altus NZ Ltd
Contact Person	[redacted]
Contact Details	[redacted]

2. Goods Manufactured by your Company

Your Company's Production of Like or Directly Competitive Goods for Domestic Sale	YE 30/06/2022		YE 30/06/2023		YE 30/06/2024		YE 30/06/2025	
	Qty (kg)	Ex-Factory Value (NZD)	Qty (kg)	Ex-Factory Value (NZD)	Qty (kg)	Ex-Factory Value (NZD)	Qty (kg)	Ex-Factory Value (NZD)
	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

3. Goods Imported by Your Company

Subject Goods Imported by Your Company	FY 2022		FY 2023		FY 2024		FY 2025 (YTD)	
	Qty (kg)	FOB Value (NZD)	Qty (kg)	FOB Value (NZD)	Qty (kg)	FOB Value (NZD)	Qty (kg)	FOB Value (NZD)
	[redacted]							

4. Like Goods Exported by Your Company

Subject Goods Exported by Your Company	YE 30/06/2022		YE 30/06/2023		YE 30/06/2024		YE 30/06/2025	
	Qty (kg)	Ex-Factory Value (NZD)	Qty (kg)	Ex-Factory Value (NZD)	Qty (kg)	Ex-Factory Value (NZD)	Qty (kg)	Ex Factory Value (NZD)
	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

5. Evidence of Serious Injury

5.1. Price Undercutting

Price undercutting occurs where the imported goods are sold on the New Zealand market, at the relevant level of trade, at lower prices than comparable like (or directly competitive) goods manufactured by the New Zealand industry for sale on the New Zealand domestic market.

Period	FY 2022	FY 2023	FY 2024	FY 2025
Your price per kg (ex-warehouse)	[redacted]	[redacted]	[redacted]	[redacted]
Price of the imported goods per kg (FIS customer warehouse)[1]	[redacted]	[redacted]	[redacted]	[redacted]
Amount of price undercutting	[redacted]	[redacted]	[redacted]	[redacted]
Price undercutting as % of your price	[redacted]	[redacted]	[redacted]	[redacted]

5.2. Price depression

Price depression occurs when the New Zealand industry's domestic selling prices are reduced because of the imports.

Period	YE 30/06/2022	YE 30/06/2023	YE 30/06/2024	YE 30/06/2025
(State basis of sales, eg ex-factory, FIS) Average selling prices per kg net of discounts and rebates	[redacted]	[redacted]	[redacted]	[redacted]

5.3. Price Suppression

Price suppression occu s when price increases that would otherwise have taken place do not occur because of the imports. This could mean, for example, that cost increases are not fully recovered.

Period	FY 2022	FY 2023	FY 2024	FY 2025 (YTD)
(State basis of sales eg ex-factory, FIS) Average selling prices per kg net of discounts and rebates	[redacted]	[redacted]	[redacted]	[redacted]

[1] See attached

Cost of production per kg	[redacted]	[redacted]	[redacted]	[redacted]
Selling and administration costs per kg	[redacted]	[redacted]	[redacted]	[redacted]
Total costs per kg	[redacted]	[redacted]	[redacted]	[redacted]
Total costs as % of average selling price	[redacted]	[redacted]	[redacted]	[redacted]

5.4. Injury Summary

Period	YE 30/06/2022	YE 30/06/2023	YE 30/06/2024	YE 30/06/2025
Output (kg)				
Sales Volume	[redacted]	[redacted]	[redacted]	[redacted]
Sales Revenue	[redacted]	[redacted]	[redacted]	[redacted]
Cost of Production	[redacted]	[redacted]	[redacted]	[redacted]
Gross Profit	[redacted]	[redacted]	[redacted]	[redacted]
Selling and Admin Expenses	[redacted]	[redacted]	[redacted]	[redacted]
Earnings Before Interest and Tax (EBIT)	[redacted]	[redacted]	[redacted]	[redacted]
Per Unit (kg)				
Sales Revenue	[redacted]	[redacted]	[redacted]	[redacted]
Cost of Production	[redacted]	[redacted]	[redacted]	[redacted]
LME, NZD cost per unit	[redacted]	[redacted]	[redacted]	[redacted]
Gross Profit	[redacted]	[redacted]	[redacted]	[redacted]
Selling and Admin Expenses	[redacted]	[redacted]	[redacted]	[redacted]
EBIT/kg	[redacted]	[redacted]	[redacted]	[redacted]

5.5. Cost of Production Summary

	YE 30/06/2022	YE 30/06/2023	YE 30/06/2024	YE 30/06/2025
Variable costs (specify)	[redacted]	[redacted]	[redacted]	[redacted]
Remake Dies	[redacted]	[redacted]	[redacted]	[redacted]
Labour	[redacted]	[redacted]	[redacted]	[redacted]
Packing	[redacted]	[redacted]	[redacted]	[redacted]
Chemicals	[redacted]	[redacted]	[redacted]	[redacted]
Gas/electricity	[redacted]	[redacted]	[redacted]	[redacted]
Freight	[redacted]	[redacted]	[redacted]	[redacted]
Fixed costs (specify)	[redacted]	[redacted]	[redacted]	[redacted]
Personnel costs	[redacted]	[redacted]	[redacted]	[redacted]
Maintenance	[redacted]	[redacted]	[redacted]	[redacted]
Depreciation&rent	[redacted]	[redacted]	[redacted]	[redacted]

Overheads	[redacted]	[redacted]	[redacted]	[redacted]
Site costs	[redacted]	[redacted]	[redacted]	[redacted]

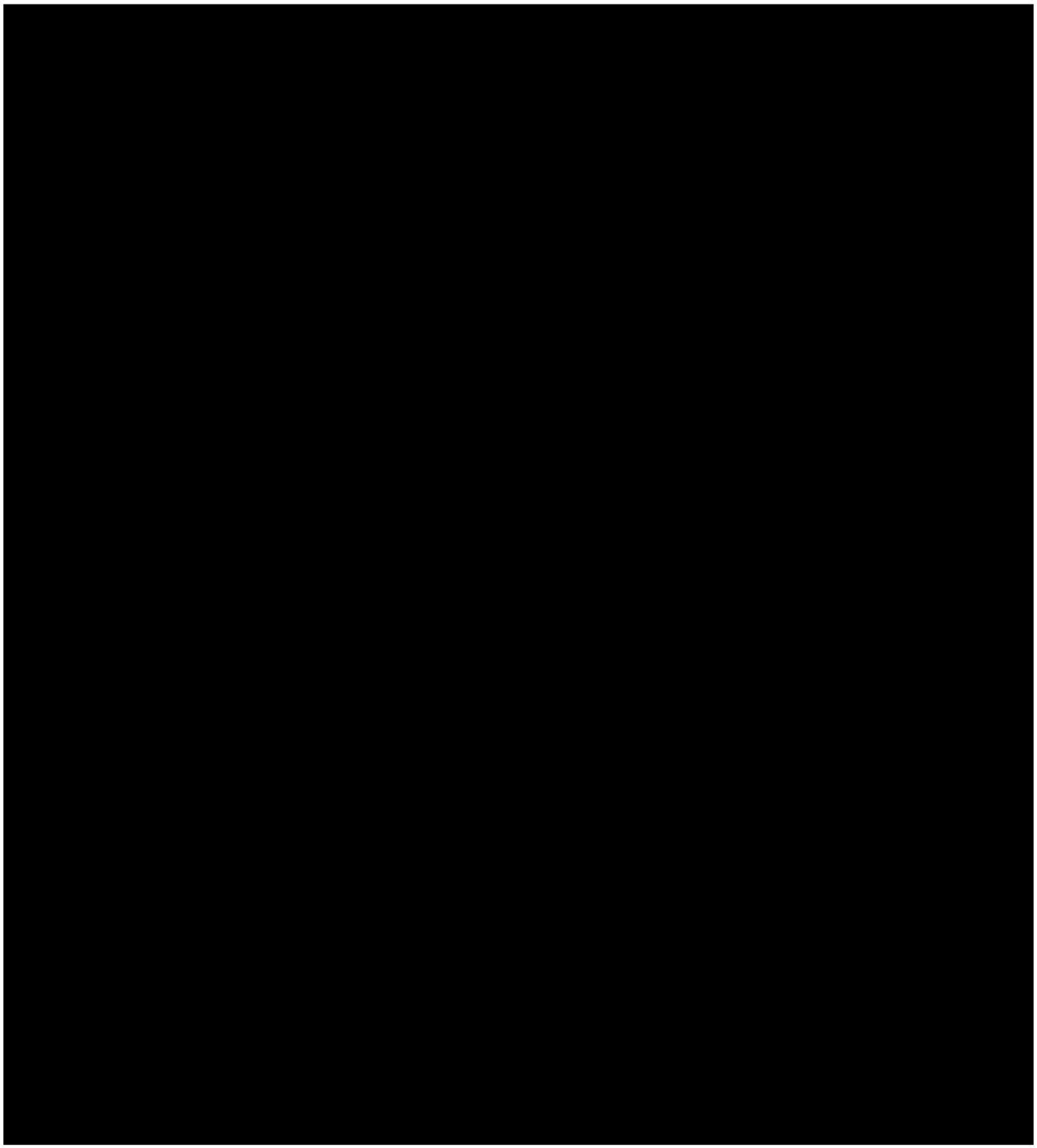
5.6. Employment *

*All people involved in running extrusion operation, and those involved in only selling the specified goods.

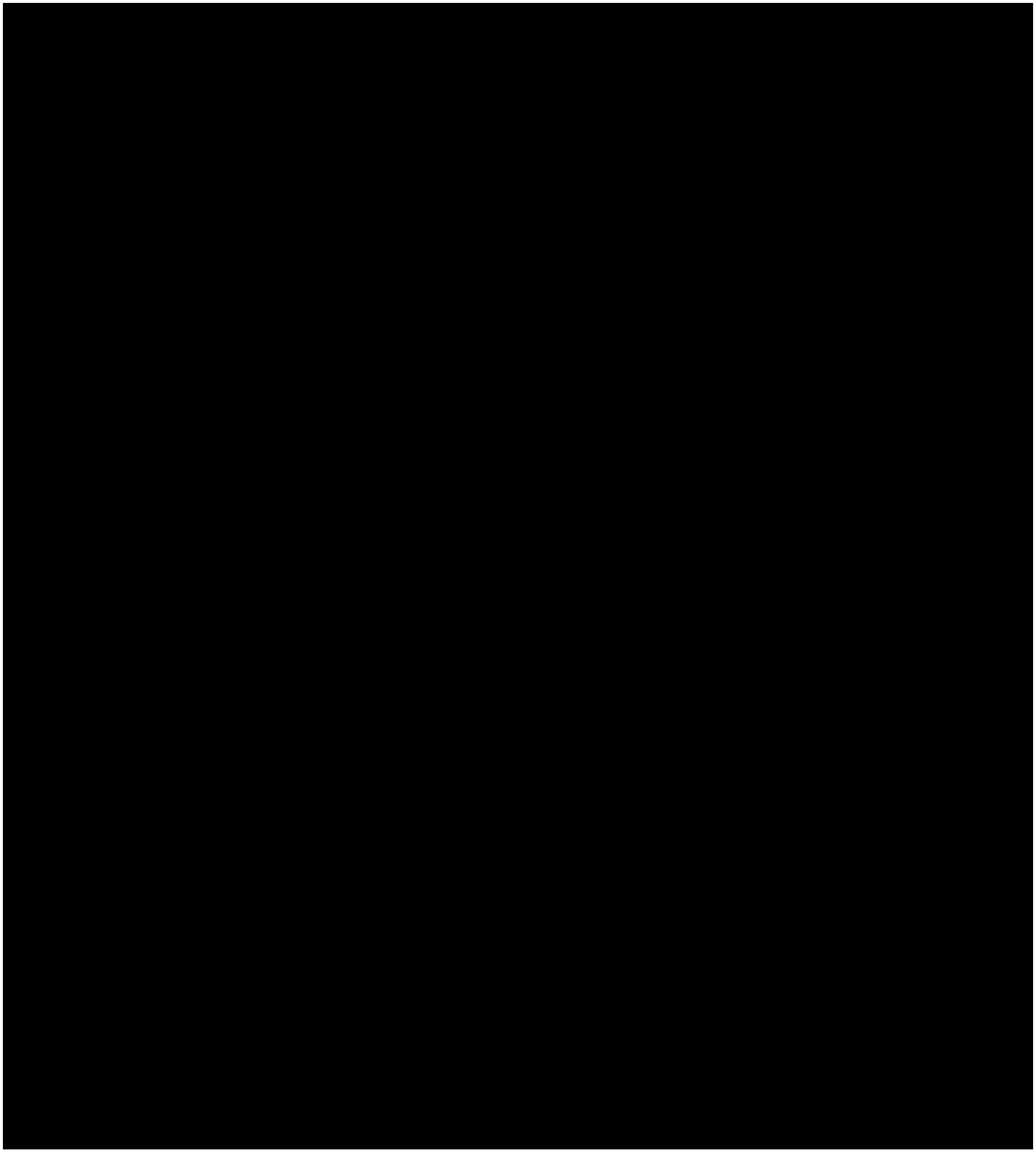
Period	FY 2022	FY 2023	FY 2024	FY 2025
Number of Employees at the end of the Period	[redacted]	[redacted]	[redacted]	[redacted]
Average Number of Employees for Each Period				

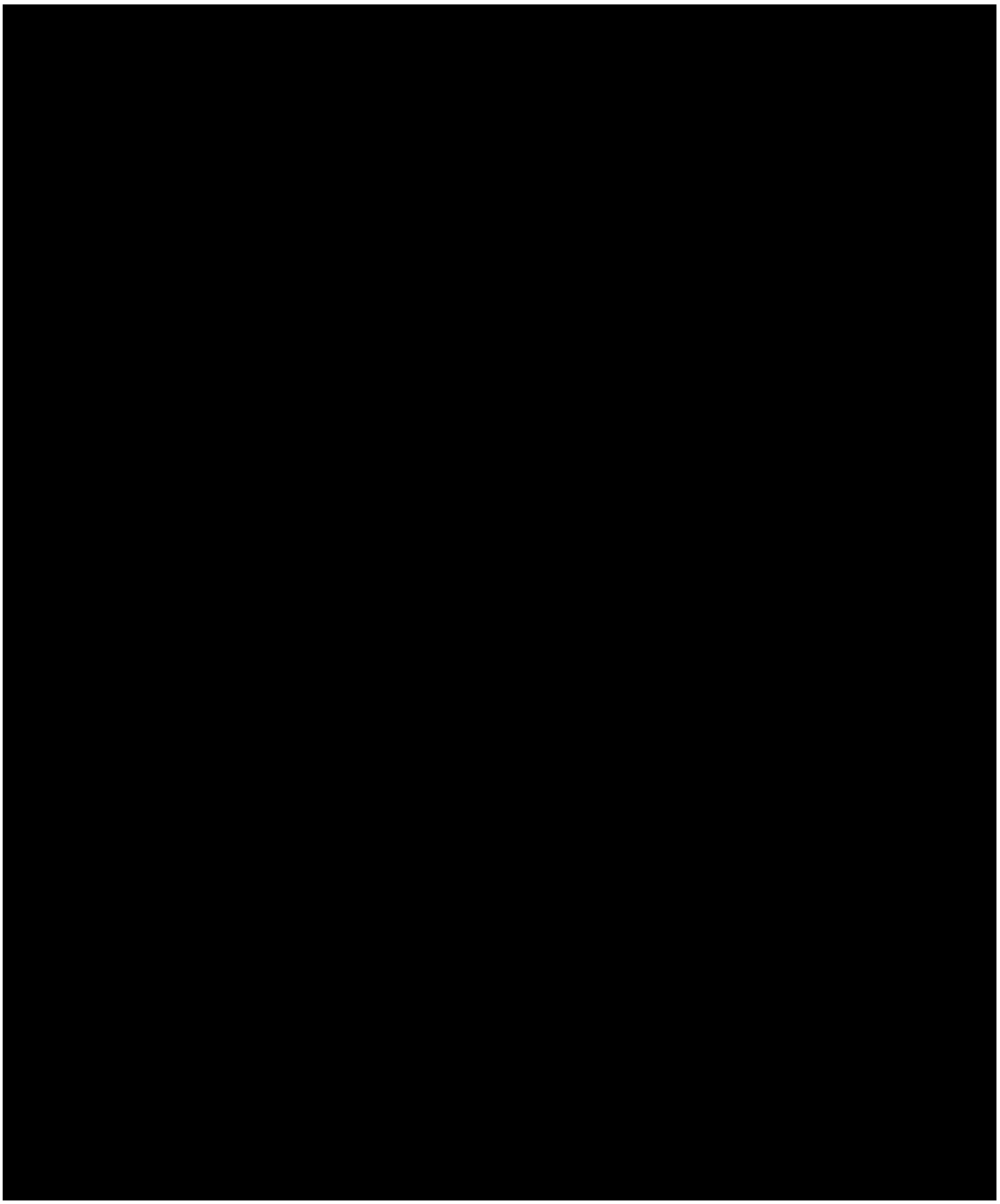
6. Commentary on Serious Injury

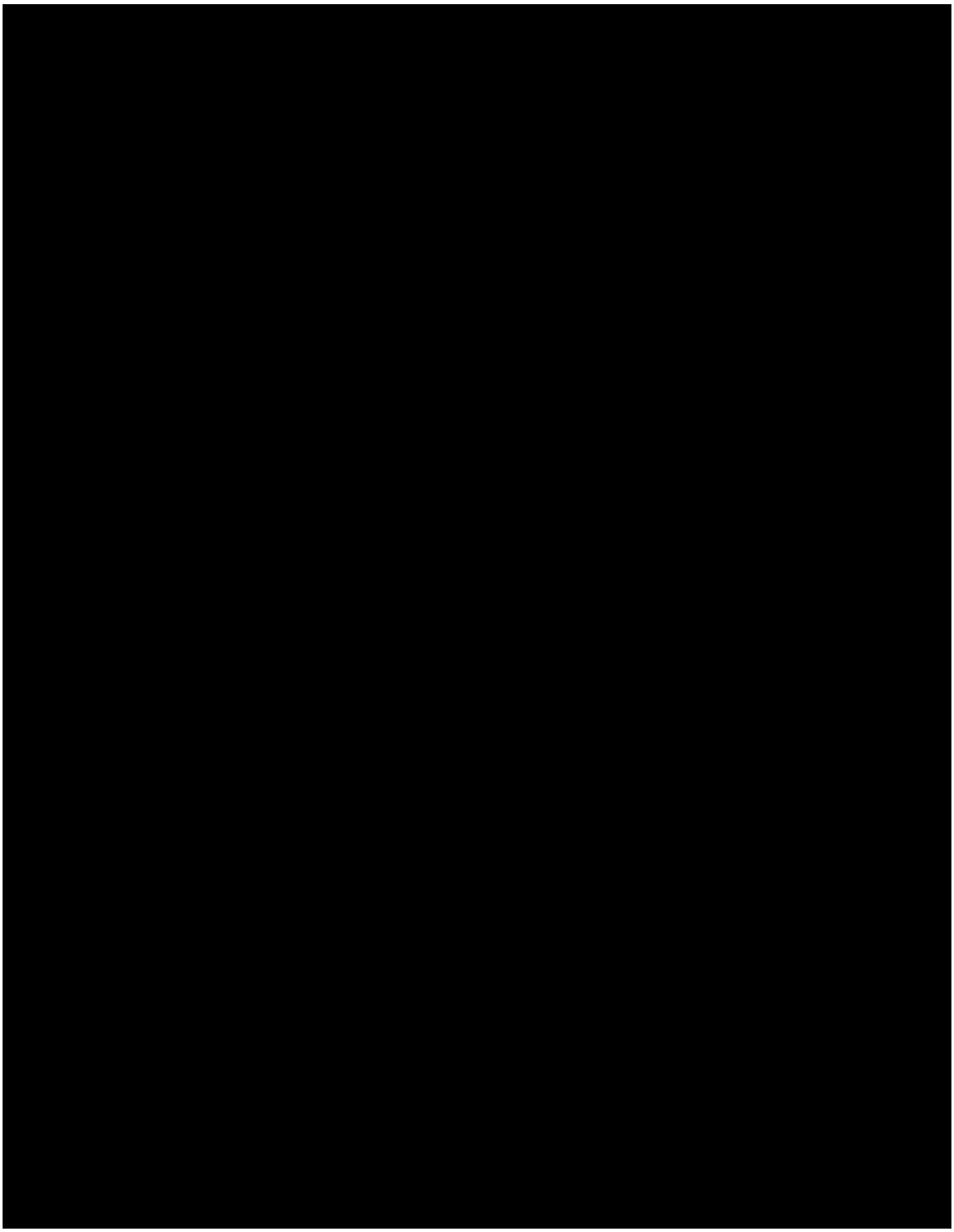
[redacted]


[redacted]

[redacted]







Appendix 9

SUMMARY OF EXPORTS
BY THE DOMESTIC INDUSTRY

Company	FY 2022		FY 2023		FY 2024		FY 2025	
	Qty (kg)	Ex Factory Value (NZD)	Qty (kg)	Ex Factory Value (NZD)	Qty (kg)	Ex Factory Value (NZD)	Qty (kg)	Ex Factory Value (NZD)
[redacted]								
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

Appendix 10

SUMMARY OF IMPORTS
BY THE DOMESTIC INDUSTRY

Company	FY 2022		FY2023		FY 2024		FY 2025	
	Qty (kg)	FOB Value (NZD)	Qty (kg)	FOB Value (NZD)	Qty (kg)	FOB Value (NZD)	Qty (kg)	FOB Value (NZD)
[redacted]								