MINISTRY OF BUSINESS, INNOVATION & EMPLOYMENT
HĪKINA WHAKATUTUKI

MBIE/SG/I/2026/001

SAFEGUARDS INVESTIGATION

CERTAIN ALUMINIUM EXTRUSIONS

DOMESTIC MANUFACTURERS (ALENZ) QUESTIONNAIRE

Investigation period: 1 January 2022 to 31 December 2025

Response due: 25 June 2026

Return completed questionnaire to:
TradeRemedies@mbie.govt.nz

Trade Remedies
Ministry of Business, Innovation and Employment
New Zealand

June 2026

Request for Information

The purpose of this questionnaire is to support the Ministry of Business, Innovation and Employment (MBIE) gather evidence to support its investigation as required in section 13 of the *Trade (Safeguard Measures) Act 2014* (the Act), and ultimately MBIE's advice to the Minister whether:

- a provisional safeguard duty should be applied, under section 14 of the Act, and
- whether a safeguard measure should be imposed under section 19 of the Act.

We are seeking information from a range of interested persons, including importers, and the domestic industry. We encourage you to complete the questionnaire, thereby ensuring that we have the best possible information to support our advice to the Minister.

Your response is requested by **5pm 25 June 2026**.

Submissions from interested persons on matters they consider relevant to the investigation, other than the questionnaire, can be made to MBIE throughout the investigation. Timely submissions are encouraged to ensure that information can be appropriately considered.

MBIE CONTACT DETAILS *If you have any questions regarding this questionnaire or the investigation, please contact the Trade Remedies team at the contact details below:*	
Trade Remedies	
MBIE switchboard:	64-4-472 0030
Email:	traderemedies@mbie.govt.nz

Safeguard Investigation

On 28 May 2026, the Minister of Commerce and Consumer Affairs (the Minister) initiated a safeguard investigation into imports of certain aluminium extrusions under section 8(1) of the Act.

Application from the New Zealand aluminium industry

The investigation is a response to an application from the New Zealand aluminium industry, represented by the Aluminium Extruders Association of New Zealand (ALENZ). In January 2026, ALENZ submitted evidence that increased imports of certain aluminium extrusions are causing serious injury to the domestic industry. The Minister determined that there were reasonable grounds to initiate a safeguard investigation.

Non-confidential copies of the application, and advice to the Minister of Commerce and Consumer Affairs, are available at Trade remedy investigations | Ministry of Business, Innovation & Employment.

What is included in this safeguard investigation?

Subject Goods
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. This includes aluminium extrusion products that have been further processed or fabricated to a limited extent, after aluminium has been extruded through a die.
Countries
Safeguard investigations consider imports from all countries. This investigation will consider imports of subject goods from 1 January 2022 to 31 December 2025. Any subsequent advice and decision to impose safeguard measures will necessarily exclude imports from Australia and Singapore, pursuant to commitments made with those countries in bilateral trade agreements. Further, advice and decisions on safeguard measures will be in line with New Zealand's commitments to the World Trade Organization (WTO).As such, exceptions will be made for products originating from developing countries, in line with article 9(1) of the *World Trade Organization (WTO) Safeguards Agreement,* if a developing country Member's share of imports does not exceed 3 per cent, and if developing country Members with less than 3 per cent import share collectively account for not more than 9 per cent of total imports.

Safeguard measures

Safeguard measures are temporary measures invoked to protect a domestic industry from serious injury caused by increased imports, and to give the industry time to adjust to import competition.

Section 19(1) of the Act outlines the points that the Minister must be satisfied with before imposing a safeguard measure. Section 18 of the Act outlines the measures that the Minister can take.

Provisional safeguard duty

The New Zealand aluminium industry has requested the consideration of a provisional safeguard duty. The Minister may order that a provisional safeguard duty be imposed on imported goods if the Minister is satisfied that there are reasonable grounds to believe that a delay in imposing a safeguard measure would cause damage that would be difficult to repair, and increased imports are causing serious injury or a threat of serious injury.

If the Minister imposes a provisional safeguard duty, that provisional safeguard duty is due and payable on the demand of the Customs on goods imported until the earliest of the date specified when the Minister imposed that provisional safeguard duty; or the date of the commencement of a safeguard measure; or 200 calendar days from the date the duty is due and payable; or the sate the provisional safeguard duty is terminated.

Investigation timetable[1]

Timeframe	Action
Provisional safeguard duty - after the Minister initiates a safeguard investigation under section 8(1) of the Act	In line with section 14(1) of the Act, the Minister may order that a provisional safeguard duty be imposed on imported goods if the Minister is satisfied that there are reasonable grounds to believe that *"(a) a delay in imposing a safeguard measure would cause damage that would be difficult to repair; and (b) increased imports are causing serious injury or a threat of serious injury".*
Final Determination - advice to the Minister deciding whether evidence supports actions under section 19 of the Act.	The Minister may impose a safeguard measure or do nothing under section 19 of the Act. Any action the Minister takes under section 19 will be notified.

Further information

If you would like further information on the safeguard investigation, please see our website at https://www.mbie.govt.nz/business-and-employment/business/trade-and-tariffs/trade-remedies/

[1] The duration of the safeguard investigation is set out in section 12 of the Act.

How to complete this questionnaire

Submission of information

Please complete all the sections of this questionnaire that are relevant to your business or your area of expertise. If your company imports aluminium extrusions, purchases imported aluminium extrusions from an intermediary and/or purchases from a New Zealand manufacturer, please complete all relevant sections of this questionnaire.

Please provide your response to this questionnaire, any supporting evidence, and a separate a version that has had confidential information removed and summarised. To support effective and timely consideration of your information, we request that responses are returned by **5pm 25 June 2026**. Your timely return of information supports MBIE's investigation and preparation of advice, against tight statutory deadlines. Please reach out to MBIE if you require any clarification or have any questions.

Important instructions for preparing your response

- Please complete all questions that you can provide information on.
- Please clearly identify all units of measurement (e.g. kilograms), currencies (e.g. NZD) used and explain any industry codes or standards. To the extent practicable, please apply the same measurement consistently throughout your response to the questionnaire and appendices.
- When referenced, please provide information in the attached appendices. Additional categories or columns may be added for any additional information required to support your submission.
- If you have used formulas to complete spreadsheets, please retain formulas in the spreadsheets provided.
- Please provide all relevant evidence to support your responses to this questionnaire. This may include copies of invoices, financial statement, extract from accounting system and shipping documentation, purchase orders or contracts, and product specification documents.
- You can contact the Trade Remedies at MBIE if you have any questions or concerns in relation to information requested in this questionnaire.

On-Site verification

MBIE may conduct an on-site verification of the information provided. This typically occurs after we receive and review your completed questionnaire. The questionnaire response forms the basis of the verification process. It is the responsibility of the respondent to ensure that all submitted information is accurate and complete, clearly links to company systems and documentation, and includes detailed explanations of how the data has been compiled.

Confidential information

MBIE is required to ensure that all interested persons have reasonable opportunity to access all non-confidential information supporting the investigation. MBIE maintains a public file for this investigation, which contains non-confidential versions of evidence gathered and received under this investigation. Interested persons can request copies of any documents on the public file.

Section 11(4) of the Act outlines the meaning and treatment of confidential information.

To support the maintenance of the public file, MBIE requests submitters to provide MBIE a summary of confidential information (for access by all interested parties) or reasons why a summary cannot be provided. Section 11(4) of the Act provides the test that MBIE must apply in assessing whether confirmation is confidential.

A non-confidential version should reproduce the original but omit or summarise any information you consider to be confidential.

Example: Redaction of Confidential Information
Where confidential text is redacted, we ask that you provide a satisfactory non-confidential summary of the information, or reasons why a summary cannot be provided. As an example, if a party was to indicate: “We import [300 metric] tonnes monthly from [Our-Suppliers-Name-Ltd].” Then a satisfactory non-confidential summary could be: “We import XXXXXXXXXXX [volume] monthly from XXXXXXXXXXXX [supplier name]”

Please note under section 11(3) of the Act, MBIE may disregard any information where it is not satisfied of non-confidential summaries (or satisfactory statement of why such a summary cannot be given).

QUESTIONNAIRE

Please note *that throughout this questionnaire references to aluminium extrusions are references to the type of goods subject to investigation as defined on page 2.*

Where data is requested to be provided on a spreadsheet, particularly in sections 5 & 7, use the accompanying spreadsheet and refer to a worksheet with the corresponding Appendix number.

To help us distinguish your answers from our questions, we would appreciate you highlighting or providing your answers in a colour other than black, e.g. red.

SECTION 1. General information

1. Please nominate a contact person in your company, or a representative, for the purposes of this investigation. We may approach you for further information to support your position throughout the investigation.

   Name:

   Position in the company:

   Telephone:

   Email address:

   Note: In nominating a representative, you are granting authority to MBIE to discuss matters relating to the investigation with the nominated representative, including your company's confidential information.

2. Please provide the following details relating to your company:
   i. Business name
   ii. Postal address
   iii. Head office address
   iv. Company website

3. Is your company part of a group (e.g. parent company with subsidiaries, common ownership, joint ventures)? If so, please provide a diagram showing the complete ownership structure, and a list of all related companies and their functions.

4. What is the overall nature of your company's business? Provide details of your level of production and trade both domestically and in international markets.

5. Please provide any brochures, pamphlets or booklets advertising your company's business, or in relation to its aluminium extrusion products.

SECTION 2. Product details

6. Please provide a full description of the types of aluminium extrusions that your company produced in the period of **1 January 2022 to 31 December 2025**.

7. Using the table below, please provide details on the characteristics of the produced goods. Please provide all information that applies for the range of products your company imports.

Physical characteristic	Detailed feature	Parameter
a. Product Identification	Production Type – Extruded	☐ Hollow ☐ Solid ☐ Complex ☐ Other: ____________
	Wall Thickness / Section Thickness	☐ ≤ 2.0 mm (Light) ☐ > 2.0 mm ≤ 4.0 mm (Medium) ☐ > 4.0 mm (Heavy / Structural)
b. Shape Classification	Shape Type	☐ Hollow / Box / RHS / SHS / Square tube / Rectangular / Pipe / Tube (HOL) ☐ Channel / U channel / C channel / Rail / Guide rail (CHN) ☐ Track / Multi track / LED housing / Circuit / Blind rail (CPL) ☐ Trim / Slat / Molding / Nosing / Cladding / Decorative (DEC) ☐ Flat bar / Solid bar / Angle / Plate / Beam (SOL)
	Additional Shape Details	____
c. Applicable Standards	AS/NZS Standard Code(s) – Primary Product	____
	AS/NZS Standard Code(s) – Post Manufacture Fabrication	____
d. Surface Finish	Finish Type	☐ Mill ☐ Mechanical ☐ Anodised ☐ Painted or Coated ☐ Other: ____________

e.	Alloy Details	Alloy Series	☐ 1xxx ☐ 2xxx ☐ 3xxx ☐ 5xxx ☐ 6xxx ☐ 7xxx
		Specific Alloy Code(s)	____________________
		Proprietary / Equivalent Alloy	____________________
		Temper Code(s)	____________________
f.	Anodising Thickness	Thickness	☐ Not Anodised ☐ ≤ 20 µm ☐ > 20 µm
g.	Post-Manufacture Fabrication	Description	____________________ ____________________ ____________________

8. Please provide any further comments you may have on any of the information provided on the specifications above.

9. MBIE must assess whether the goods manufactured in New Zealand are “like” the goods imported. Please outline similarities and differences of the goods the New Zealand industry produces compared to the imported goods. Possible considerations include:
   - Physical characteristics, including details of the size and dimensions and details of the production methods and technologies utilised to create the product.
   - Function and usage of the products including details of any known consumer perceptions and expectations, and end usages.
   - Pricing structures for the product including details of the level of trade at which the product is priced, costs that are built into its pricing structure and how price is set.
   - Marketing and distribution channels used, customers (both actual and targeted), branding and advertising.

SECTION 3. Manufacturing Process

10. The process for manufacturing the like goods, from start to finish, and if and to what extent there have been any recent changes in the process. This should include:

    a. A discussion on the relevant standards and external quality controls or audits and any limitations on product specification and size etc.;
    b. Any recent developments in manufacturing technology;
    c. Whether there are any differences between the aluminium extrusions produced by your company and that imported from overseas; and
    d. Your company's capacity utilisation, including a discussion on the necessity to maintain throughput.

11. The capability of your company to manufacture a range of product specifications and dimensions and the extent to which this production capacity satisfies demand within the New Zealand market.

SECTION 4. Accounting System

12. An overview of the structure of accounting system, how it operates and specific discussion on:

    a. costing method
    b. transfer pricing (if applicable)
    c. asset revaluation
    d. depreciation methods
    e. budget and forecasting models
    f. allocation of overheads and advertising expenses.

13. The methods of calculating the financial information contained in the application including information on:

    a. sales volume and sales revenue
    b. domestic production
    c. cost and expenditure information, including input costs and costs of sales
    d. fixed costs and how these are allocated to the goods under investigation.

14. Whether the accounting records kept by your company are independently audited and maintained in accordance with New Zealand's generally accepted accounting practice or NZ equivalents to IFRS.

15. A description of the stock management strategy that your company employs.

16. Costs relating to the production of aluminium extrusions will need to be verified, including the method of apportioning fixed costs to aluminium extrusions. Please explain if there has been any significant revaluation of assets in relation to the subject goods over the injury period.

SECTION 5. New Zealand market for alluminium extrustions

To the extent that you have not already done so in your application, or that you wish to, please provide further information on the following matters:

17. Details of market share and an overview of the New Zealand market for the goods under investigation.
    a. the make-up of the market
    b. any market segmentation (by type or size)
    c. the major participants in the market, their level of trade (e.g. merchant, trader, downstream industry, consumer) and their market shares
    d. factors affecting the market including seasonality
    e. any recent changes to the market
    f. the main factors influencing demand for the product in New Zealand
    g. your company's perception of future trends.
18. Comments on the trends in the global market for the subject goods, including any specific comments about the Chinese markets.
19. Please provide, in Excel spreadsheet format, transaction-level sales details (i.e. to each customer) of the values and volumes of all like goods sales for the period *1 January 2022 to 31 December 2025* including gross and net prices, discounts, rebates, freight and other costs or charges included in the price, and credit terms.
20. The sort of competition that your company is facing from any subject goods.

Product uses

21. Downstream uses of the subject goods and details of patterns of consumption in the New Zealand market over the last five years

SECTION 6. Provisional safeguard duty assessment

These questions are specific to our assessment under section 14(1)(a) of the Act. Our advice on whether the Minister should impose provisional safeguard duties will not be limited by answers in this section – though the questions specifically target that assessment. In preparing advice against other parts of section 14 of the Act, we will consider responses to other questions in this questionnaire.

Please answer all possible questions and provide any available evidence, to support the investigation.

22. Would a delay in imposing a safeguard measure cause damage to your industry that would be difficult to repair? If yes, please describe the damage and provide any supporting evidence
23. What actions is your company considering or implementing to manage the impacts of increased imports, including any operational, strategic, or workforce adjustments? please describe these actions, their timing, and why their impacts would be hard to repair.

24. Are you aware of any significant upcoming changes in import patterns – such as significant orders that have not yet arrived in New Zealand?

25. Are you aware of any significant upcoming commercial decisions among purchasers of aluminium extrusions, such as purchasing contracts?

26. Are you aware of any other imminent trade concerns that might further threaten the industry? These could include things like a significant risk of imminent trade diversion, possibly from a government, or commercial decision and that may be difficult or expensive to reverse?

27. Are you aware of any other factors that may be driving poorer economic performance among the domestic industry, and any imminent change to those factors?

28. Are you aware of any other mechanisms by which the imported products causing injury to the domestic industry. This can be impacts such as demand for goods produced by the domestic industry, competition, or pricing strategies. Do you consider that the alleged injury to the domestic industry is of an immediate or irreversible nature?

SECTION 7. Evidence of serious injury

MBIE is required to assess whether imports have caused serious injury or a threat of serious injury. During the investigation we will be working to normalise the injury data to calendar years, with the investigation period running 1 January 2022 to 31 December 2025. Please provide injury data in calendar years where possible.

Volume and value of goods

29. Please provide detailed information on the volume and value of aluminium extrusions that you produce, import, export, and sell. Please provide this information in calendar years where possible. You can use the tables below as a guide to structure your answer if helpful. ***(Please refer to Appendix tables 1, 2 & 3 for details productions and sales).***

Volume of goods manufactured and traded

	Calendar years			
Volume (e.g. in metric tonnes)	**2022**	**2023**	**2024**	**2025**
Your production				
Model 1				
Model 2				
Sales to customers in New Zealand				
Model 1				
Model 2				
Exports – if relevant				
Imports – if relevant				

Value of goods manufactured and traded, and cost of inputs

	Calendar years			
Value (e.g. in NZD)	**2022**	**2023**	**2024**	**2025**
Sales to customers in New Zealand				
Model 1				
Model 2				
Exports – if relevant				
Imports – if relevant				

30. If are exporting any aluminium extrusions, please provide details on the export markets that you supply to, including volume and value to each of those markets.

31. If you are importing any aluminium extrusions, please provide details on the markets that you are sourcing from, including volume and value from each of those markets (Appendix 5)

32. Please indicate if you are re-exporting any goods – that is, are you exporting any goods that you have imported? If so where are you exporting?

Input costs and EBIT

33. Please provide information on the total cost of production, and fixed costs associated with selling aluminium extrusions, using the table below. For variable costs, please list all costs to the ex-factory level of trade. For fixed costs, please explain how you allocated those fixed costs to the aluminium extrusions under investigation (i.e., to separate them from other goods that you sell). ***Please refer to Appendix 4 for details cost of production section.***

	Calendar years			
Value (e.g. in NZD)	**2022**	**2023**	**2024**	**2025**
Cost of production				
Please list input goods and their total costs over the investigation period				
Fixed costs				
Please list fixed costs associated with selling aluminium extrusions				
Earnings before interest and tax				

Use of production capacity

34. What is your production capacity? Please comment on how your production capacity compares with your actual production. The analysis of productivity will depend on the information the New Zealand industry is able to provide on the productivity measures it uses. A common productivity measure is the production of like goods per employee engaged in that production.

35. Has your production capacity changed since 1 January 2022? In what way has the production capacity changed and what where the reasons for the company to make this change?

36. Are there any significant decisions that you need to consider when operating below your production capacity?

Profits and productivity

37. Other than the earnings before interest and tax, do you have any other evidence to provide about your profitability or productivity?

Employment

38. Please provide information about the staff (FTE) that you employ to produce and sell aluminium extrusions. Please provide information on employment costs (e.g. wages) – which can be aggregated, through the investigation period. What proportion of employees that are permanent, part-time and casual?

Inventory

39. Please provide a summary of your inventory strategy, and whether the inventory that you have held has changed over the investigation period. Please provide substantiation of inventory levels by quantity and value at the end of each financial year over the injury period.

Other injury factors and threat of injury

40. Do you have any other commentary or evidence to provide to support your position that the increase in imports has caused serious injury to the domestic industry?

41. Do you have any other commentary of evidence to provide to support an argument that the industry is experiencing a *threat* of serious injury?

42. Please provide commentary and evidence of other factors contributing to the poorer economic performance of the domestic industry. Factors could include things like:
    a. Increases to input costs, such as energy, raw materials or labour costs
    b. Changes in demand in the New Zealand market and export performance
    c. Technological change
    d. Competition within the New Zealand producers

Factors affecting domestic prices

43. To the extent possible please substantiate details of any factors that have affected domestic prices over the injury period.

Adjustment plans

44. Please provide information on any adjustment plans your company intends to implement following an increased in imports. These could include factors such as:
    a. Any long-term adjustments to production
    b. Any proposed investments, including to improve productivity
    c. Any other business adjustment that you are considering, for example in changing your employment profile.
45. Do you have an expected timeline to make these adjustments?

46. If a temporary safeguard measure was imposed, how would that change your adjustment plans?

SECTION 8. Unforeseen development

As part of its investigation, MBIE is required to consider whether increased in imports were due to unforeseen developments. The application provides arguments on this in section 9 of the application.

47. Do you have any further commentary or evidence to support or refute the case made in the application that the increase in imports was due to unforeseen developments?

MBIE may seek further commentary or evidence on the domestic industry's perception of unforeseen developments later in the investigation.

SECTION 9. Public interest

MBIE is required to consider the public interest in recommending whether a safeguard measure should be imposed. Section 13(1)(e) contains a non-exhaustive list of factors that MBIE may consider.

48. What is your expectation of the likely effectiveness of a safeguard duty, or other restrictive trade measure, in assisting the domestic industry?

49. Do you have any views on alternative approaches to a safeguard measure?

50. What is your perception on the impact of a safeguard measure on the market, including consumers? To the extent you have evidence, please comment on the likely impact on price and availability of aluminium extrusions in New Zealand.

51. Do you have any comments on the strategic importance of the domestic industry, for example to the New Zealand economy?

SECTION 10. Suggested measures

If the Minister agrees that, having reviewed the evidence gathered, that a safeguard measure is necessary, the Minister may impose a safeguard duty under section 18 of the Act, a duty or a variation of any rate of duty… or a restriction on importing the goods.

52. Do you have a view on what measure would be most appropriate in this case? Please provide commentary and evidence to support your view.

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For any questions regarding this questionnaire or the investigation, please contact the Trade Remedies team at MBIE via **traderemedies@mbie.govt.nz**, using the case reference **MBIE/SG/I/2026/001** in the email subject line.

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