



MBIE/SG/I/2026/001

SAFEGUARD INVESTIGATION

CERTAIN ALUMINIUM EXTRUSIONS

EXPORTER QUESTIONNAIRE

Investigation period: 1 January 2022 to 31 December 2025

Response due: 30 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 30 June 2026**.

Submissions from interested persons on matters 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 MBIE Trade Remedies 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
<i>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.</i> 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 aluminium extrusions 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 <i>World Trade Organization (WTO) Safeguards Agreement</i>, 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 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 date the provisional safeguard duty is terminated.

Investigation timetable¹

<i>Timeframe</i>	<i>Action</i>
Provisional Safeguard Duty - Any time 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 <i>“(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”.</i>
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 exports aluminium extrusions directly to customers in New Zealand or exports aluminium extrusions through an intermediary, 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 30 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 questions.

The applicant has sought a provisional safeguard duty. MBIE will provide advice to the Minister during the investigation to support their decision on whether to impose a provisional safeguard duty under section 14 of the Act.

Important instructions for preparing your response

- Please complete all questions that you can provide information on.
- Please provide answers in English. An English translation should be provided for documents not originally in English.
- Please clearly identify all units of measurement (e.g. kilograms), currencies used (e.g. NZD) 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.
- Please show all amounts in the currency originally denominated. Where any currency conversions are made, please indicate the exchange rate used and its source.
- Where requested, use the attached appendices to provide your responses. Please name the worksheets with the corresponding appendix number and structure the data clearly with appropriate headings, formatting and consistency.
- If you have used formulas to complete spreadsheets, please retain these formulas in the spreadsheets provided.
- Please provide all relevant evidence to support your responses to this questionnaire. This may include copies of invoices, export and shipping documentation, purchase orders or contracts, and product specification documents.
- You can contact Trade Remedies at MBIE if you have any questions or concerns in relation to information requested in this questionnaire.

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 export [300 metric] tonnes monthly from [Our-Suppliers-Name-Ltd].”

Then a satisfactory non-confidential summary could be:

“We export XXXXXXXXXXXX [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 subject goods defined on page 2.

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 that 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. Do you have any business relationship with your New Zealand customers, other than a standard commercial trading arrangement?
5. Please provide any brochures, pamphlets or booklets advertising your company's business in relation to its aluminium extrusion products.
6. What is the overall nature of your company's business? Does your company manufacture aluminium extrusions? Please provide details of make, level of trade, the products that your company export.
7. Please provide the names of the New Zealand importers that purchase aluminium extrusions from you.

SECTION 2. 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.

We appreciate that you may not be in a position to answer all of these questions. Please answer all possible questions and provide any available evidence to support the investigation.

8. Do you have any evidence for or against an argument that a delay in imposing a safeguard measure would cause damage that would be difficult to repair.
9. Do you have any evidence for or against an argument that increased imports are causing serious injury or a threat of serious injury.
10. Are you aware of any significant upcoming changes in export patterns – such as significant orders that have not yet shipped to New Zealand?
11. Are you aware of any significant upcoming commercial decisions among purchasers of aluminium extrusions, such as purchasing contracts?
12. Are you aware of any other imminent trade concerns that might threaten the industry? These could include things like a significant risk of imminent trade diversion, or commercial decision and that may be difficult or expensive to reverse.
13. Are you aware of any other mechanisms by which the imported products causing injury to the New Zealand 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 3. Product details

Please complete this section if your company exported aluminium extrusions to New Zealand over the period of investigation or exported aluminium extrusion to a third party which later supplied customers in New Zealand.

14. Please provide a full description of the types of aluminium extrusions that your company exported to New Zealand in the period **1 January 2022 to 31 December 2025**.
15. Using the table below, please provide details on the characteristics of the goods exported to New Zealand. Please provide all information that applies for the range of products your company exports.

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	

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

17. MBIE must assess whether the goods manufactured in New Zealand are “like” the goods imported. Please outline any similarities and differences of the goods that the New Zealand industry produces compared to the goods that you export.

Possible considerations include:

- Physical characteristics, including details of size and dimensions and details of the production methods and technologies utilised to create the product.
- Function and usage of products, including details of any known consumer perceptions and expectations, and end usages.
- Pricing structures for the products, including details of the level of trade at which the product is priced, costs that are built into its pricing structure, and how the price is set.
- Marketing and distribution channels used, customers (both actual and targeted), branding and advertising.

SECTION 4. Exports to New Zealand

Please complete this section if your company exported aluminium extrusions over the period of investigation.

18. Please provide the following information in respect of all aluminium extrusions exported by your company to New Zealand, or to another entity that later exported to New Zealand from **1 January 2022 to 31 December 2025**. Please feel free to add extra lines to the table below if, for example, you export multiple products to one customer.

Customer name	Product description	Total export volume			
		2022	2023	2024	2025

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19. Please provide details of all export transactions of your company's exports of aluminium extrusions to New Zealand for the period of **1 January 2022 to 31 December 2025** in the format set out in **Appendix 1**.
20. Does your company have any relationship other than that of a supplier with any of the businesses that you have listed in question **14** above? If so, please provide details of that relationship, including its effect on sales and pricing between the entities.
21. Please provide sample documentation (covering a period of 3-6 months each year) for transactions reported above. This includes invoices, purchase agreements, export documentation, product specifications, or test certificates.
22. Please explain the terms of trade that you offer to your customers in New Zealand. This should cover:
 - i. ordering and invoicing;
 - ii. lead times;
 - iii. terms of any supply agreements or contracts;
 - iv. explanation of how prices are negotiated;
 - v. the basis of your company's purchase price (e.g. FOB, CIF);
 - vi. currency of purchase;
 - vii. payment terms;
 - viii. details of any discounts; and
 - ix. any other special terms and conditions your company receives e.g. sales promotion, advertising rebates.
23. Are the prices offered by your company to customers for aluminium extrusions:
 - i. subject to any direct or indirect reimbursement; or
 - ii. influence by a commercial agreement or relationship; or
 - iii. inclusive of any consideration other than price? Please provide an explanation if so.
24. Please provide summary of exports of aluminium extrusions to other countries for the period of **1 January 2025 to 31 December 2025**. Please use the format provided in **Appendix 2**.
25. Over this period, **1 January 2022 to 31 December 2025**, please explain the following:
 - i. Any changes in the volume of products exported to New Zealand by your company. What caused the changes? What were the contributing factors?
26. Please provide details of any forward contracts that were entered into for the exportation of aluminium extrusions to New Zealand beyond **31 December 2025**. Use the format set out in **Appendix 3**. List the product type, volume and value, quantity ordered, price paid or payable, and anticipated delivery dates.

SECTION 5. Production capacity and inventory

Production data

27. Please briefly describe your aluminium extrusion production process, including the key stages of production, the inputs used, and any other relevant details.
28. Please provide your total production volume for each year and explain how your company measures its maximum production capacity. Please use the format provided in **Appendix 4**
29. Please explain any significant changes in production levels over the investigation period.
30. What factors have contributed to any observed change in production?
31. Identify any technological developments that may have impacted your company's production volumes over the period of investigation.

Capacity and utilisation

32. Please provide details of your installed production capacity for each year. Please use the format provided in **Appendix 4**.
33. Please explain any significant changes in capacity or utilization, including expansions, shutdowns, or operational constraints.
34. Is your company planning to increase its capacity to produce and sell aluminium extrusions? If so, please provide details. Please comment on the extent to which any such increase would enable your company to significantly increase exports to New Zealand.

Inventory

35. Please provide opening and closing stock levels for each year – Please use the format provided in **Appendix 5**.
36. Please explain any notable accumulation or depletion of inventories and the reasons for such changes.
37. Please provide your company's current inventory level of aluminium extrusions available for export. What percentage of your company's annual export sales does the current level of inventory represent? Does your company intend to increase this inventory level, in the foreseeable future? If so, by what amount and by what date?
38. If you are accumulating an inventory, what are the factors driving this decision?

SECTION 6. Cost and pricing information

Please provide detailed cost and financial data relating to the production and sale of the product under investigation.

39. Please provide an overall cost of production including raw materials, labour, energy, and overheads and please explain any major changes in cost components over the investigation period.
40. Please describe your export pricing methodology (e.g., cost-plus, market-based pricing).
41. Please provide the details of any discounts, rebates, commissions, or other adjustments affecting export prices.

42. Explain any notable pricing trends or strategies during the investigation period.

SECTION 7. Factors relevant to exports and market conditions

Please provide information on factors that may be relevant to the assessment of export trends and market conditions.

Changes in export trends

- 43. Please explain the reasons or your assessment for any increase or decrease in your exports to New Zealand over the investigation period.
- 44. From your experience, please describe any changes in demand for aluminium extrusions among your New Zealand customers over the period of investigation.
- 45. Please explain the impact of exchange rate movements on your export performance.

SECTION 8. Comments on injury and causation

Please provide your views on the issues of injury and causation in this investigation.

View on changes in volume of exports

- 46. Are you expecting any significant changes (increase or decrease) in exports to New Zealand? Please include any confirmed but not yet shipped orders (with volume, value, and timing).
- 47. Have there been any recent or planned changes in production capacity, export allocation, or market focus that may affect export volumes to New Zealand? This includes any redirection of exports from other markets — please explain the reasons.
- 48. Have you recently entered into, or are you negotiating, long-term supply contracts or other binding agreements with New Zealand customers that could influence export volumes regardless of market conditions?
- 49. Have you experienced reduced access to other export markets, or are there any government policies, incentives, or economic/regulatory factors in your country that may encourage increased exports to New Zealand?

Measures in other markets

- 50. Please indicate whether your exports are subject to safeguard, anti-dumping, or countervailing measures in other countries.
- 51. Please provide details of such measures, including the country, type of measure, and period of application.

Position on safeguard measure

- 52. Please explain how any proposed safeguard measure may affect your exports and broader market conditions.

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