MINISTRY OF BUSINESS, INNOVATION & EMPLOYMENT
HĪKINA WHAKATUTUKI

Trade (Safeguard Measures) Act 2014

SAFEGUARD INVESTIGATION

Certain Aluminium Extrusions

Final Report

MBIE/SG/I/2026/001

September 2026

Public version

ISBN(Online): 978-1-997308-73-7

New Zealand Government

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1. Executive Summary

1.1 Purpose of this report

1. This report details the safeguard investigation into the import of extruded aluminium products under the *Trade (Safeguard Measures) Act 2014* (the Act). This investigation follows an application made by the Aluminium Extruders Association of New Zealand (ALENZ) under the Act.

2. The investigation has been undertaken by the Ministry of Business, Innovation and Employment (MBIE). It is New Zealand's first safeguard investigation under the Act.

3. This report largely follows the same structure as the Act, stepping through the matters the chief executive must investigate in a safeguard investigation.

4. After receiving the chief executive's report about a safeguard investigation (this document), the Minister may make a decision on the imposition of a safeguard measure.

1.2 Findings

5. On the basis of its investigation conducted in accordance with section 13 of the Act, MBIE is satisfied that the findings to be reported to the Minister are that:

- Absolute volumes of aluminium extrusions increased between 2015 and 2022, peaking in late 2022. Since this peak, imports have declined over the period of investigation (1 January 2022- 31 December 2025) and increased in the first seven months of 2026. Trade volumes of aluminium extrusions are erratic, and MBIE does not consider that the increase in imports in the first seven months of 2026 to be significant when viewed over the investigation period.
- The domestic market for aluminium extrusions has contracted since 2022 and imports relative to domestic production have increased since then.
- The domestic industry has suffered serious injury. However, the increase in imports is one source among many, including a contracting domestic market and cost increases. Therefore, the injury attributable to imports does not reach the threshold of serious injury for the purpose of 13(1)(a).
- The domestic industry has submitted that the circumstances that led to the increase in imports were unforeseen developments. However, MBIE found that while some of these developments, for example changes to United States tariff policy, or a reduction in construction activity in The People's Republic of China (China), may have been unforeseen, those developments have not led to a corresponding increase in imports in New Zealand.
- While a safeguard measure would likely improve the financial performance of the domestic industry by reducing competition from imports, it will not address the injury caused by domestic factors. Additionally, there is insufficient evidence that a safeguard measure would enable the domestic industry to adjust to the increased competition posed by increased imports of goods. Accordingly, MBIE has found that this case does not pass the threshold in the Act to recommend a safeguard measure is imposed.
- Public interest considerations weigh against the imposition of a safeguard measure. A safeguard measure is likely to be effective in assisting the domestic

industry over the short term, supporting New Zealand's manufacturing sector and regional economies. However, a safeguard measure is likely to raise prices for downstream manufacturers, end-users and consumers, and not support New Zealand's international relations and trade goals. Therefore, MBIE finds that public interest considerations do not warrant the imposition of a safeguard measure.

2. Background to the investigation

2.1 Summary of proceedings

6. On 21 January 2026, MBIE received an application from ALENZ to initiate a safeguard investigation into the import of extruded aluminium products under the Act.

7. ALENZ' grounds for the application are that there has been an increase in imports of aluminium extrusions relative to the amount of like goods produced in New Zealand and that this increase is causing serious injury to the domestic industry.

8. On 27 May 2026 the Minister of Commerce and Consumer Affairs, Cameron Brewer, decided to initiate an investigation under section 8 of the Act, being satisfied that there were reasonable grounds for an investigation into whether increased imports are causing serious injury or a threat of serious injury.

9. On 28 May 2026, in accordance with section 8(3) of the Act, the Minister notified the decision to initiate a safeguard investigation. The time allowed for the investigation formally commenced on 29 May 2026, the day after the date on which the Minister initiated the investigation as per section 12(1) of the Act.

10. Submissions were received from interested parties throughout the course of the investigation. The public file of submissions to the investigation and other relevant documents, available to interested parties to the investigation, was updated throughout the course of the investigation.

11. Verification of information took place on 19, 24, 25, and 26 August 2026. This included an online verification workshop with all ALENZ members on 19 August, and MBIE undertaking site visits to domestic manufacturers in New Plymouth and Hamilton.

2.1.1 Provisional safeguard duty

12. Section 14(1) of the Act allows for a provisional safeguard duty to be imposed, after the initiation of the investigation, 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.*"

13. ALENZ, in its application to initiate a safeguard investigation, requested the imposition of a provisional safeguard duty. ALENZ submitted that a provisional safeguard duty was necessary on the grounds that a delay in the application of a safeguard duty would cause "further serious injury to the domestic industry that would be difficult to repair".

14. MBIE provided initial advice to the Minister on a provisional safeguard duty on 4 August 2026. Following additional submissions from interested parties MBIE provided supplementary advice to the Minister on 1 September 2026, taking into account this additional information.

15. On advice from MBIE, the Minister declined to impose a provisional safeguard duty. MBIE advised that although there were reasonable grounds to believe that increased imports were causing serious injury or threat of serious injury, there were not reasonable grounds

to believe that a delay in imposing safeguard measures would cause damage to the domestic industry that would be difficult to repair.

16. The decision to not impose a provisional safeguard measure was communicated to ALENZ on 3 September 2026.

17. The test for provisional safeguard measures is different to that of the overall safeguard investigation. A decision not to impose a provisional safeguard measure does not preclude the Minister from imposing a safeguard measure upon receipt of this report.

18. After the decision not to impose a provisional safeguard measure was communicated to ALENZ, MBIE approached the remainder of the investigation without predetermined conclusions, remaining open to all possible outcomes.

2.1.2 Period of investigation

19. The period of the investigation is 1 January 2022 to 31 December 2025. This period was primarily determined on the basis of information supplied by ALENZ in its application.

20. When engaging interested parties, for example through questionnaires, MBIE referred to this period of investigation, and asked for data specifically for this period. Directing the scope of data requests to this period also reflected the administrative burden and cost associated with compiling information over a longer timeframe.

21. MBIE also has access to additional data, such as import data, and some data relating to the injury assessment, for periods before and after the period of investigation. MBIE has considered that additional data in the course of this investigation.

22. Although the primary period of investigation is 1 January 2022 to 31 December 2025, MBIE has considered events and data from periods outside of this period where relevant to the investigation for comparison or baseline purposes.

2.1.3 Purpose of the Act

23. Section 3 of the Act describes the purpose of the legislation;

> *"to enable New Zealand to apply safeguard measures and provisional safeguard duties at its border in accordance with the Agreement establishing the World Trade Organization adopted at Marrakesh on 15 April 1994 (the WTO Agreement). Such measures and duties are intended to –*
>
> *(a) provide temporary protection to a domestic industry from serious injury caused by increased imports; and*
>
> *(b) facilitate adjustment by a domestic industry to increased competition from increased imports."*

24. Section 4 of the Act refers to safeguard measures being a trade remedy, along with dumping and countervailing duties. The distinction between purposes is illustrative:

25. Section 1A of the *Trade (Anti-dumping and Countervailing Duties) Act 1988* notes that;

> *"[a]nti-dumping and countervailing duties are intended to prevent material injury or the threat of material injury to an industry, or the establishment of an industry being materially retarded, due to dumped or subsidised goods being imported into New Zealand."*

26. The notable differences between safeguard measures and anti-dumping and countervailing duties are that:

- Safeguard measures are intended to be temporary measures to provide relief, and facilitate adjustment to increased competition from the increase in imports. The imposition of a safeguard measure does not require a finding of unfair trade practices.
- Anti-dumping and countervailing duties go further than this and seek to specifically remediate harm from unfair trading practices.

27. One of the defining purposes of the Act is to give effect to the 1994 Marrakesh Agreement establishing the World Trade Organization (WTO). The Marrakesh Agreement is the umbrella treaty under which both the General Agreement on Tariffs and Trade 1994 (the GATT) and the Agreement on Safeguards (and other WTO Agreements) are incorporated. Where relevant domestic case law is unavailable for interpreting the Act, MBIE has relied on the WTO Agreements and their corresponding jurisprudence to support implementation of the Act.

28. The WTO Agreements and their associated jurisprudence highlight the extraordinary circumstances that safeguard measures seek to address:

- Article XIX of the General Agreement on Tariffs and Trade (GATT) is subtitled "Emergency action on imports of particular products"[1]
- In *Argentina – Footwear*, in 1999, the WTO Appellate Body further emphasised this point saying "safeguard measures are by definition a mechanism based on "emergencies": the very nature of a safeguard measure is to tackle an *urgent* situation which was *not expected* [paragraph 43]. It later noted that "Article XIX:1(a) [of the GATT] requires a product be imported "*in such increased quantities* and *under such conditions as to cause or threaten serious* injury to domestic producers"" [paragraph 93]
- In *Korea – Dairy*, in 1999, the Appellate Body highlighted the differences between safeguard measures and anti-dumping and countervailing duties: "We should not lose sight of the fact that taking safeguard action results in restrictions on imports arising from "fair" trade. The imposition of a safeguard measure does not depend upon "unfair" trade actions, as is the case with anti-dumping or countervailing measures." [paragraph 87]

29. In undertaking this investigation, MBIE has sight of the situations that safeguard measures are intended to address, noting in particular that the imposition of a safeguard measures seeks to restrict an increase in imports arising from fair trade.

2.2 Interested persons

30. Section 10(1) of the Act requires the chief executive to seek submissions relating to a safeguard investigation from interested persons (giving an appropriate time period), and to consider any submissions received.

[1] The Marrakesh Agreement is the umbrella treaty under which both the GATT and the Agreement on Safeguards operate (and other WTO Agreements). The GATT incorporates and updates the original GATT 1947 rules, while the Agreement on Safeguards sets out the specific conditions for applying safeguard measures under GATT Article XIX

31. Section 11(1) of the Act provides for all interested persons to have access to all information relevant to a safeguard investigation except for confidential information and other information the chief executive would be likely to withhold under provisions in the *Official Information Act 1982*. This information is held on a file that is available to interested parties.

2.2.1 Applicant

32. The applicant is the Aluminium Extruders Association of New Zealand (ALENZ), an incorporated society that represents the combined interests of the New Zealand domestic industry of aluminium extruders.

33. The industry is made up of five independent businesses who all support the application:

- Altus NZ Limited (Altus)
- Independent Extrusions Limited (INEX)
- McKechnie Aluminium Solutions Limited (McKechnie)
- Aluminium Extrusion Company Limited (ALEXCO), and
- Vulcan Ullrich Aluminium NZ Limited (Vulcan).

34. Detailed information in the application was supplied by Altus, INEX, and McKechnie. While commonly referred to by name, these three companies are also referred to in this report as the participating industry. ALEXCO has provided some information and data to the investigation as well. Vulcan provided rounded production figures in support of the application.

Composition of domestic industry

35. The combined production of Altus, INEX, and McKechnie of like or directly competitive goods accounts for around [redacted] per cent of total domestic production with the remainder made up by ALEXCO and Vulcan. [redacted]

36. The participating industry largely produces a similar range of goods, both custom-designed and generic extruded aluminium products. Some of the manufacturers offer their own proprietary products lines or are connected to particular product lines. McKechnie for example, owns OMEGA Windows and Doors while INEX is vertically integrated into the production of APL Window Solutions.

37. ALEXCO is a smaller, Wellington-based precision extruder specialising in manufacturing small-to-medium profile extrusions. Vulcan is a large metals distributor and processor. In July 2022, Vulcan acquired Ullrich Aluminium, a major Australasian aluminium distributor for approximately NZ$165 million[2].

2.2.2 Other interested persons

38. New Zealand-based importers were identified from New Zealand Customs Service (Customs) data and invited to supply information which would identify suppliers and information which would assist in identifying imports of imported goods. Questionnaires

2 Radio New Zealand. (2022, January 22). Vulcan Steel targets buyout of Ullrich Aluminium for $165m. Radio New Zealand. https://www.rnz.co.nz/news/business/471433/vulcan-steel-targets-buyout-of-ullrich-aluminium-for-165m.

were sent to these importers to obtain and confirm information relating to import shipments, and information on the operation of the New Zealand market.

39. Other persons also registered as interested persons to the investigation. A full list of interested persons can be found at Appendix 2.

2.3 Imported goods, like goods and directly competitive goods

40. MBIE must investigate the "domestic industry" as defined in the Act:

> ***"domestic industry*** *means—*
>
> *(a) producers who produce like goods or directly competitive goods in New Zealand; or*
>
> *(b) producers whose collective production constitutes a major proportion of the production in New Zealand of like goods or directly competitive 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."*
>
> ***"like goods****, in relation to imported goods, means—*
>
> > *(a) goods that are like the imported goods in all respects; or*
> >
> > *(b) in the absence of goods referred to in paragraph (a), goods that have characteristics closely resembling the imported goods."*

41. This means the definition of the "domestic industry" depends on the definition of "like goods" or "directly competitive goods", which in turn, depends on the definition of the "imported goods" set out in the application. "Imported goods" is not defined in the legislation.

42. Imported goods are defined in ALENZ' application 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..."*

43. These imported goods are further defined in ALENZ' application as:

> *"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.."*

44. This definition of imported goods provides the basis for the matters MBIE must investigate, being producers who produce goods that are like or directly competitive with the imported goods.

45. MBIE notes that in its application, ALENZ defines the goods produced by the domestic industry that are like or directly competitive with the imported goods using a narrower

definition compared to its definition of imported goods. Namely, the applicant appears to have excluded goods subject to further finishing. The applicant described the like or directly competitive goods 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) as described as industrial/geometric shapes."*

46. Despite this narrower characterisation of like or directly competitive goods by the applicant, MBIE is required to investigate the 'domestic industry' as defined in the Act. This means producers of goods that are like goods or directly competitive with the imported goods as described in ALENZ' application.

47. MBIE has assessed that the parties to the application (Altus, Inex, McKechnie, ALEXCO and Vulcan form part of the 'domestic industry' as defined in the Act.

48. MBIE notes that there are likely to be additional producers that specialise solely in finishing activities and that have not provided data for this investigation. MBIE considers that while this is a limitation, the information supplied is sufficiently representative of the domestic industry to enable the necessary conclusions to be reached for the purposes of this investigation.

ALENZ proposed updates to goods description

49. After discussions during verification regarding the coverage of the like goods description compared to imported goods and reflecting MBIE's assessment outlined above, ALENZ and the participating industry provided further data to align with the imported goods definition in the application.

50. ALENZ also proposed to extend the goods definition to include thermal breaks. Doing so would have changed the definition of the imported goods subject to investigation. MBIE ruled out expanding the goods definition without giving other interested parties adequate opportunity to consider the change, which was not possible at that stage of the investigation.

2.3.1 Tariff classification

51. The imported goods to this investigation are classified in the Customs Working Tariff Document as follows:

Tariff item	Stat Key Code	Unit	Description	Duty %	Pref.
76.04			Aluminium bars, rods and profiles -- of aluminium alloys		
7604.21.00	00B		--Hollow profiles	5	Free *
7604.29			--Other	5	Free
7604.29.09	00F	kg	---Other	5	Free*
*Unless otherwise indicated, AAN, AU, CN, CPT, HK, KR, LLDC, MY, Pac, SG, TH, TPA and TW rates in the Preferential Tariff are Free					

Table 1 - Tariff Classification[3]

52. MBIE notes that these tariff items also contain goods that are made of aluminium but are not subject to this investigation. Examples include aluminium drink bottles or household goods, aluminium dies, finished goods made of aluminium and assembly kits. For the purposes of this investigation these goods have been excluded from analysis. Further detail of the process MBIE undertook to refine the goods under these tariff lines to the goods subject to this investigation only is included in Appendix 5.

2.3.2 Summary of imported goods, like goods, and directly competitive goods

53. MBIE is satisfied that the definition of the imported goods description is sufficiently clear and comprehensive for the purposes of this investigation, and that the domestic industry produces goods that are like, or directly competitive with those imported goods.

54. Further analysis and findings related to goods is available at Appendix 3.

[3] New Zealand Customs Service. (2019, July 1). *Working tariff document of New Zealand: Section XV, base metals and articles of base metals*. https://www.customs.govt.nz/globalassets/documents/tariff-documents/working-tariff-document-2018/section-xv-1-july-2019.pdf

3. Legal Requirements

3.1 Matters the chief executive must investigate

55. Section 13(1) of the Act specifies matters that the chief executive must investigate:

(a) whether increased imports have caused serious injury or a threat of serious injury:

(b) whether the increased imports were due to unforeseen developments:

(c) whether a safeguard measure is necessary—

i. to prevent or remedy serious injury; and

ii. to facilitate adjustment by the domestic industry to the increased competition from the increased imports:

(d) if a safeguard measure is necessary, —

i. which goods should be subject to a measure; and

ii. which measure is appropriate; and

iii. what is the appropriate extent and duration of the measure:

(e) the public interest, which may entail, among other matters, a consideration of the following:

i. the likely effectiveness of a safeguard measure in assisting the domestic industry:

ii. the alternatives to a safeguard measure:

iii. the likely effect of a safeguard measure on the market (including on consumers):

iv. New Zealand's international relations and trade goals:

v. the strategic importance of the domestic industry.

56. Section 13(2) of the Act also provides that:

In investigating whether there is a serious injury or threat of serious injury for the purposes of subsection (1)(a), the chief executive must consider the impact of the increased imports on the domestic industry, including actual and potential decline in output, sales, market share, profits, productivity, employment and utilisation of production capacity.

57. Section 13(3) of the Act provides that:

In investigating whether the increased imports have caused serious injury or threat of serious injury for the purposes of subsection (1)(a), the chief executive must consider-

(a) the nature and extent of imports of the goods by the domestic industry, including the value, quantity, frequency, and purpose of the imports; and

(b) factors other than imports that have injured, or are injuring, the domestic industry.

3.2 Form of safeguard measure

58. A safeguard measure, as defined in section 18 of the Act, is:

...any of the following imposed on or in relation to imported goods, following a safeguard investigation under this Act:

(a) a safeguard duty:

(b) a duty or a variation of any rate of duty under the Tariff Act 1988:

(c) a restriction on importing the goods under the Customs and Excise Act 2018, or the Imports and Exports (Restrictions) Act 1988.

3.3 Basis for Minister's decision about a safeguard measure

59. After receiving the chief executive's report about a safeguard investigation (this document), the Minister may take actions to impose a safeguard measure, if they are satisfied that certain criteria, set out in section 19(1) of the Act, are met.

60. The specific criteria that must be met is as follows;

"After receiving the chief executive's report about a safeguard investigation, the Minister may take one or both of the actions set out in subsection (2) in relation to imported goods if the Minister is satisfied that—

(a) increased imports have caused serious injury or a threat of serious injury; and

(b) the increased imports were due to unforeseen developments; and

(c) the safeguard measure is necessary—

i. to prevent or remedy serious injury; and

ii. to facilitate adjustment by the domestic industry to the increased competition from the increased imports; and

(d) the safeguard measure relates to the appropriate goods, is the appropriate measure, and is of the appropriate extent and duration; and

(e) the action is in the public interest; and

(f) the particular safeguard measure is not incompatible with New Zealand's international obligations as a party to the WTO Agreement or otherwise."

3.4 Actions the Minister may take

61. Upon satisfaction of the above criteria, as outlined in section 19(2), the actions the Minister may take are to;

(a) order that a safeguard duty be imposed; or

(b) recommend that the Governor-General make an Order in Council imposing a safeguard measure referred to in section 18(b) or (c).

62. Section 19(3) of the Act includes detail on exemptions;

The Minister may exempt or may recommend the Governor-General by Order in Council exempt (whichever is appropriate) imported goods from certain exporting countries from a safeguard measure at any time, including after the measure has been imposed, if the Minister is satisfied that an exemption -

(a) is necessary to comply with New Zealand's international obligations as a party to the WTO Agreement or otherwise; or

(b) will further New Zealand's international relations or trade goals.

63. New Zealand has committed in certain trade agreements to exempt particular economies from any safeguard measures and not to impose safeguard measures beyond certain thresholds in others. A technical note on exemptions to safeguard measures is included at Appendix 4.

4. Whether the increase in imports have caused serious injury or a threat of serious injury

4.1 Increase in imports, causation and serious injury

64. Section 13(1)(a) of the Act requires the chief executive to investigate "*whether increased imports have caused serious injury or a threat of serious injury*".

65. This section of the report considers this matter in three parts:

1. whether imports have increased
2. whether serious injury or a threat of serious injury has occurred or is occurring, and
3. whether there is a causal relationship between any increase in imports and any observed serious injury.

66. There are several definitions outlined in section 5 of the Act that are pertinent to the application of the test:

> ***increased imports*** *means 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*
>
> ***serious injury*** *means a significant overall impairment in the position of a domestic industry*
>
> ***threat of serious injury*** *means a serious injury that is clearly imminent.*

67. In investigating whether the increased imports have caused serious injury or a threat of serious injury for the purposes of subsection (1)(a), MBIE has considered the matters set out in sections 13(2) and 13(3) of the Act.

4.2 Assessing import volumes

4.2.1 Data understanding and limitations

68. Imported goods are recorded under two tariff codes that are broader than the scope of this investigation. As a result, the tariff codes include some goods that are not subject to the investigation.

69. To ensure the import analysis reflects only relevant trade, MBIE reviewed detailed Customs import data and undertook a line-by-line assessment to identify goods that were in scope, out of scope, or uncertain. This included removing imports for example, gun parts and accessories, or aluminium drink bottles, that may legitimately be classified under the relevant tariff codes but are not subject to the investigation. The methodology used to make these determinations is outlined in Appendix 5.

70. MBIE determined that 93.09 per cent of the trade under the relevant two tariff lines was in scope, or likely in scope of the investigation. 2.37 per cent of trade under the two relevant tariff lines was determined as uncertain, and 4.55 per cent out of scope of the investigation. Both uncertain and out of scope trade were not included for further analysis. Appendix 6 includes a sensitivity analysis of this import data, where uncertain import entries are added to the analysis. MBIE also obtained information from participating importers and exporters to help validate the Customs data.

71. The Customs data that MBIE has relied on is more detailed than publicly available data, which some interested parties, including ALENZ, reference in submissions. Publicly shared data includes all trade aggregated at the tariff code level. MBIE, operating under a Memorandum of Understanding with NZ Customs, has access to data with a higher degree of disaggregation. Although access to this data helps MBIE make better assessments as to the trade patterns, the limitations outlined above still apply.

72. MBIE's analysis of trade volumes includes import data from all trade, including trade from countries that may be exempt from safeguard measures (refer Appendix 4 for an explanation of exemptions to any safeguard measure). Imports from these countries were included to ensure that MBIE was able to consider the full picture of imports and any resulting injury.

4.2.2 Absolute import volume

Import volumes have not increased over the period of investigation

73. Imports of relevant goods have gradually declined over the investigation period. Figure 1 below shows the volume and value of trade data over the investigation period.

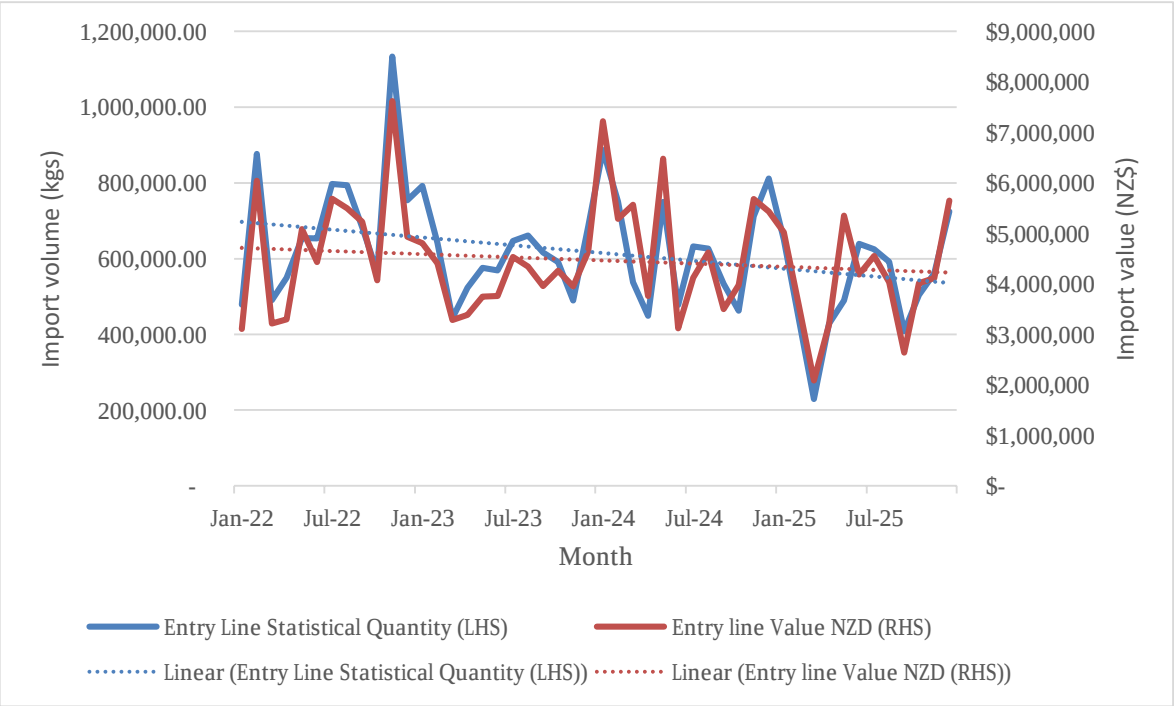

Figure 1 – Total import good imports by month 2022 – 2025[4]

Imports have increased over the last 11 years

74. When considering import data of aluminium extrusions over a longer time period, data shows that imports have increased over time, with a marked acceleration in import growth between 2020 and 2022. Figure 2 below illustrates annual imports of imported goods from 2015 to 2025.

[4] New Zealand Customs Service. (2026). Confidential trade data showing imports against tariff items 76042100 00B and 76042909 00F. Unpublished.

Figure 2 - Imports in kg and NZ$[5]

75. ALENZ argues that with a previous increase in trade, the imports have been able to embed in the New Zealand market, and that while imports have not increased in absolute terms over the investigation period, they have commanded a greater market share, and therefore imports have increased in relative terms.

Imports have increased since the end of the period of investigation

76. Over the course of the investigation, ALENZ submitted additional information illustrating an increase in imports in 2026. While this information was primarily provided in support of ALENZ's request for provisional duties, the additional import data is relevant to the wider investigation.

77. Figure 3 below shows the volume of imported goods from January 2022 to July 2026 by month. It illustrates that there have been some months, chiefly May and July 2026, where there has been a higher volume of imports compared to the same period in previous years, while other months like February, March and April have had lower volumes than in recent years.

[5] New Zealand Customs Service. (2026). Confidential trade data showing imports against tariff items 76042100 00B and 76042909 00F. Unpublished.

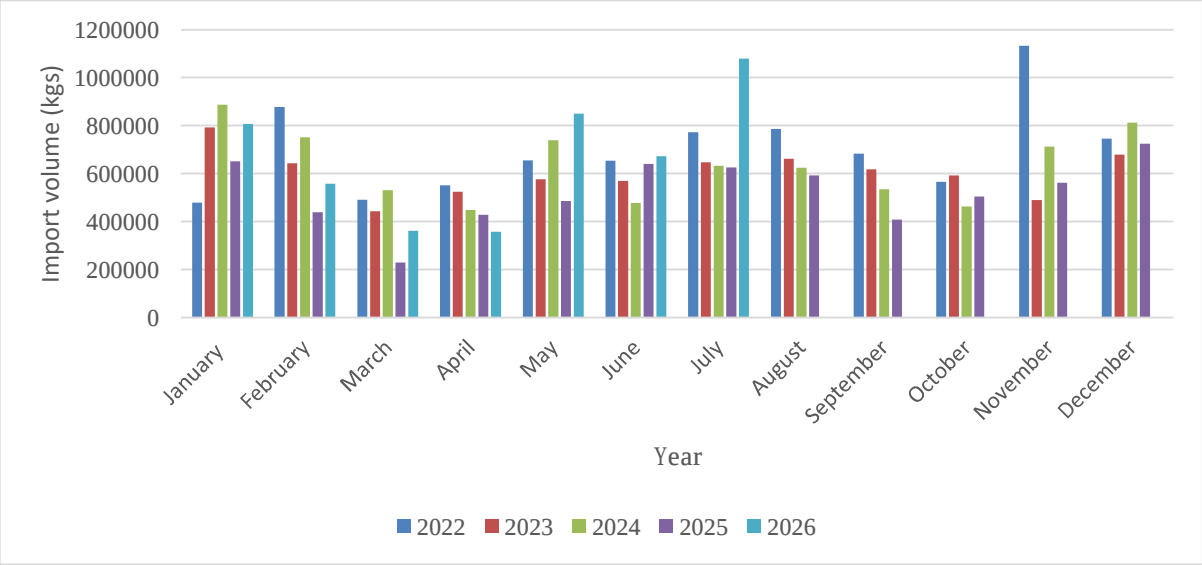

Figure 3: Volume of imported goods from January 2022 to July 2026[6]

78. Table 2 below shows imports for the January to July period each year, and how this has changed from the previous year (expressed as a percentage). While there was an increase in imports in 2026, this followed a drop in imports in 2025. Imports in 2026 were approximately five per cent higher in the equivalent period in 2024.

Year (Jan – July)	Volume of imports (kg)	Percentage change on previous year
2022	4,475,325	4%
2023	4,193,975	(6%)
2024	4,464,188	6%
2025	3,497,358	(22%)
2026	4,685,136	34%

Table 2 – Imports to New Zealand, January to July 2022 - 2026[7]

Imports relative to New Zealand production

79. This section considers changes in imports compared to domestic production and the New Zealand market.

80. This reflects the definition of increased imports in the Act 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"*. This comparison is outlined in both absolute and relative terms in Figures 4 and 5.

[6] New Zealand Customs Service. (2026). Confidential trade data showing imports against tariff items 76042100 00B and 76042909 00F. Unpublished.

[7] New Zealand Customs Service. (2026). Confidential trade data showing imports against tariff items 76042100 00B and 76042909 00F. Unpublished.

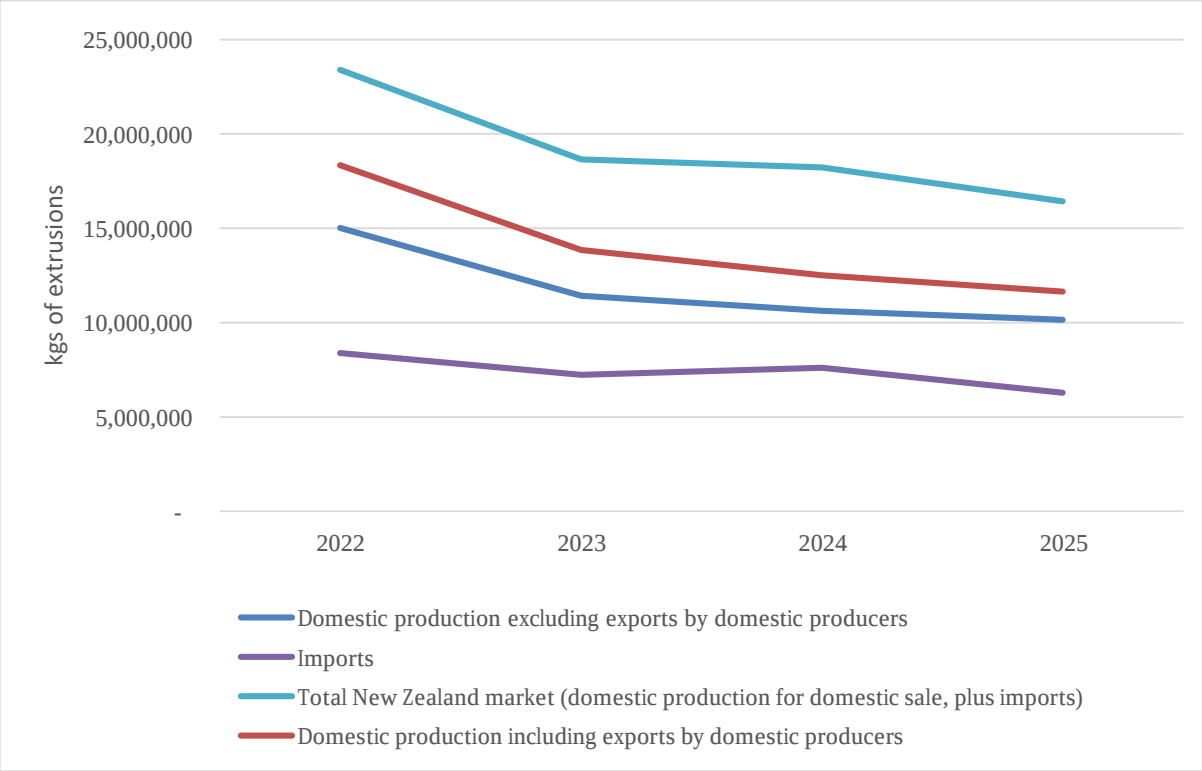

Figure 4 – Domestic market, imports and domestic production[8]

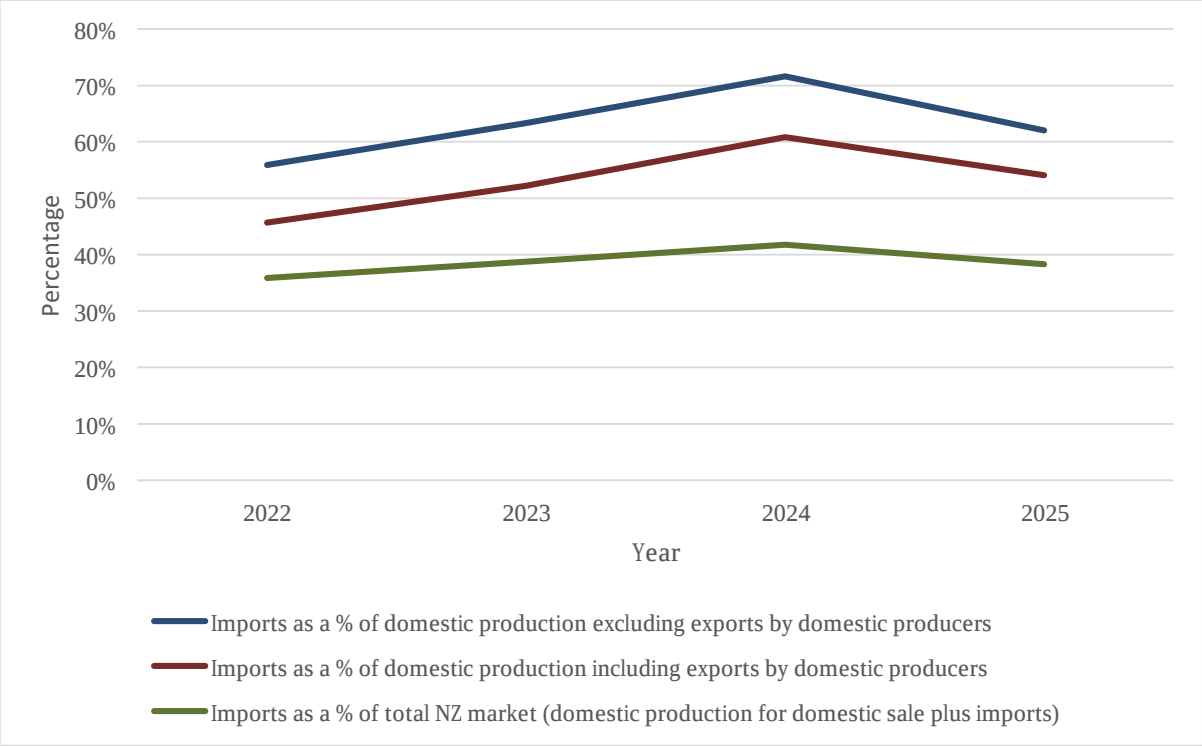

Figure 5 - Imports as a percentage of domestic production and the New Zealand market[9]

4.2.3 Summary of imports analysis

81. The evidence above can be summarised as:

- Absolute volumes of imports of aluminium extrusions increased between 2015 and 2022. Since 2022, imports have remained somewhat steady in absolute terms, with a

minor decline over the investigation period and an increase in the first seven months of 2026.

- By comparison, the total New Zealand market and domestic production also declined in absolute terms.
- In relative terms, imports increased as a percentage of domestic production (including exports) from 46 per cent in 2022 to 61 per cent in 2024, before declining to 54 per cent in 2025.[10]

4.3 Serious injury

82. In investigating whether there is serious injury or a threat of serious injury for the purposes of subsection 13(1)(a), the Act states that "*the chief executive must consider the impact of the increased imports on the domestic industry, including actual and potential decline in output, sales, market share, profits, productivity, employment, and utilisation of production capacity.*

83. Serious injury is defined under the Act as "*a significant overall impairment in the position of the domestic industry*". Threat of serious injury means "*a serious injury that is clearly imminent*".

84. Section 13(2) of the Act specifies the list of factors that the chief executive must consider in relation to serious injury. MBIE has chosen to include price effects analysis on price undercutting, price depression and price suppression, as additional measures to support the injury analysis and provide a more comprehensive assessment of injury.

4.3.1 Injury data provided by industry

85. To investigate the existence of serious injury or a threat of serious injury, MBIE considered:

- Data provided by [redacted] a[redacted]owing actual and potential decline in output, sales, market share, profits, productivity, employment, and utilisation of production capacity. This data was provided for the period of investigation (2022 to 2025) and for January to July for 2026.
- Undercutting, price depression, and price suppression, as additional measures to support the injury analysis.

86. [redacted] and [redacted] provided separate injury data for distinct stages of the extrusion production process. This is reflected in how the data has been recorded in the injury sections below. Data was provided distinct to the following stages of the production process for like or directly competitive goods:

- **Mill-finish goods:** Data relating to aluminium extrusions that have been produced but not subject to further processing.
- **Further processed goods:** Data relating to aluminium extrusions that have undergone additional processing, including powder coating, fabrication, and/or anodising. These

[8] See Appendix 8: Source for domestic production data and total NZ market data.

[9] See Appendix 8: Source for domestic production data and total NZ market data.

[10] Note the Act requires consideration of the "*… relative increase as compared with the amount of like or directly competitive goods produced in New Zealand*". This measure risks masking other factors, such as declining exports from the domestic industry. MBIE has provided analysis on alternative calculations in Figure 5 but has concluded in line with the Act.

goods are commonly referred to by the industry as “value-add” or “value-added” goods.

- **Mill-finish and further processed goods (combined):** Aggregate data covering all aluminium extrusions within scope of the investigation, including both mill-finish goods and further processed goods.

87. MBIE notes that the “like or directly competitive goods” that are the subject of this investigation include extrusions that are produced as both mill-finish and further processed goods.

4.3.2 Data limitations

88. MBIE relied on information provided by the applicant in submissions to the investigation, including responses to the domestic questionnaire and in the application. Verification, proportionate to the timeframes available to conduct the investigation, was undertaken to assess whether the reported data related to the stated injury factors and whether it was internally consistent and broadly supported by underlying records. Verification was not conducted as a financial audit and did not include a full reconciliation of reported data to audited financial statements.

89. The injury analysis relates to a subset of each producer's operations rather than their total business activities. As producers do not ordinarily collect or report information on this basis, assumptions and allocation methodologies were required to attribute revenue, costs, employment, and other injury factors to the like goods. Verification assessed the reasonableness of these methodologies but did not independently recalculate all allocations from source records.

90. Injury information was received by MBIE at several stages of the investigation, with some data changing due to refinement of calculation methodologies used by producers. Where data was inconsistent across different tranches of information, MBIE relied on the most recent data provided, as this reflected changes made by participating industry to calculation methodologies and the separation of mill-finish, further processed, and total production data. Earlier information was relied upon where updated information was unavailable for a relevant measure.

91. Whi[redacted] counted for approximately [redacted] of the domestic market in 2025 and the company [redacted] market share over the period of investigatio[redacted]d not provide data for the injury analysis. Consequently, [redacted]

92. Whil[redacted]rovided some data, that data could not be verified and as such has been included in a separate section (4.3.13). MBIE assessed trends i[redacted]erformance based on publicly available information.

93. Further information on MBIE’s approach to verification is provided in Appendix 7.

4.3.3 Output

Mill-finish goods output

94. Mill-finish goods data fro[redacted]how declining sales output from 2022 to 2025:

- [redacted]l-finish goods sales output declined by [redacted] per cent, from [redacted] kg in 2022 to [redacted] kg in 2025.

- [redacted] was unable to confirm output figures provided [redacted] only related to mill-finish goods.
- [redacted] mill-finish goods sales output declined by [redacted] per cent, from [redacted] kg in 2022 to [redacted] kg in 2025.

[redacted] **Sales output (kg)**	**2022**	**2023**	**2024**	**2025**	**Jan to June 2026**
Mill-finish goods	[redacted]				
Percentage change on previous year					
[redacted] **Sales output (kg)**	**2022**	**2023**	**2024**	**2025**	**Jan to July 2026**
Mill-finish goods	[redacted]				
Percentage change on previous year					

Table 3 – Sales output of mill-finish goods for [redacted] (kg)

Further processed goods output

95. [redacted] stated further processed goods sales output declined from 2022 to 2025:

- [redacted]r processed goods sales output declined by [redacted] per cent, from [redacted] kg in 2022 to [redacted] kg in 2025.
- [redacted]t provide data relating to only further processed goods output.
- [redacted] further processed goods sales output declined by [redacted] per cent, from [redacted] kg in 2022 to [redacted] kg in 2025.

[redacted]

[redacted] **Sales output (kg)**	**2022**	**2023**	**2024**	**2025**	**Jan to June 2026**
Powder coated standard Finish	[redacted]				
Powder coated high-performance finish					
Anodised					
Total further processed goods sales output					
Percentage change on previous year					
[redacted] **Sales output (kg)**	**2022**	**2023**	**2024**	**2025**	**Jan to July 2026**
Powder coated	[redacted]				
Anodised					
Fabricated					
Total further processed goods sales output					
Percentage change on previous year					

Table 4 – Sales output of further processed goods for [redacted]

Mill-finish and further processed goods output

96. [redacted] stated mill-finish and further processed goods sales output declined

- [redacted] put declined by [redacted] per cent, from [redacted] kg in 2022 to [redacted] kg in 2025.
- [redacted] declined by [redacted] per cent, from [redacted] kg in 2022 to [redacted] kg in 2025.
- [redacted] stated output declined by [redacted] per cent, from [redacted] kg in 2022 to [redacted] kg in 2025.

[redacted]

[redacted] Sales output (kg)	2022	2023	2024	2025	Jan to June 2026
Mill-finish and further processed goods	[redacted]				
Percentage change on previous year					
[redacted] Sales output (kg)	2022	2023	2024	2025	Jan to June 2026
Mill-finish and further processed goods	[redacted]				
Percentage change on previous year					
[redacted] Sales output (kg)	2022	2023	2024	2025	Jan to July 2026
Mill-finish and further processed goods	[redacted]				
Percentage change on previous year					

Table 5 – Mill-finish and further processed goods output for [redacted]

4.3.4 Sales

Mill-finish goods sales revenue

97. [redacted] all experienced declines in mill-finish goods sales revenue from 2022 to 2025:

- [redacted] goods sales revenue declined by [redacted] per cent, from $[redacted] in 2022 to $[redacted] in 2025.
- [redacted] goods sales revenue declined by [redacted] per cent, from $[redacted] in 2022 to $[redacted] in 2025.
- [redacted] mill-finish goods sales revenue declined by [redacted] per cent from $[redacted] in 2022 to $[redacted] in 2025.

[redacted]

[redacted] **Sales revenue (NZ$)**	**2022**	**2023**	**2024**	**2025**	**Jan to June 2026**
Mill-finish goods	[redacted]				
Percentage change on previous year					
[redacted] **Sales revenue (NZ$)**	**2022**	**2023**	**2024**	**2025**	**Jan to June 2026**
Mill-finish goods	[redacted]				
Percentage change on previous year					
[redacted] **Sales revenue (NZ$)**	**2022**	**2023**	**2024**	**2025**	**Jan to July 2026**
Mill-finish goods	[redacted]				
Percentage change on previous year					

Table 6 – Sales revenue of mill-finish goods for [redacted]

Further processed goods sales revenue

98. [redacted] all demonstrate declining further processed goods sales revenue from 2022 to 2025:

- [redacted] further processed goods sales revenue declined by [redacted] per cent, from $[redacted] in 2022 to $[redacted] in 2025.
- [redacted] further processed goods sales revenue declined by [redacted] per cent, from $[redacted] in 2022 to $[redacted] in 2025.
- [redacted] further processed goods sales revenue declined by [redacted] per cent, from $[redacted] in 2022 to $[redacted] in 2025.

[redacted]

[redacted] **Sales revenue (NZ$)**	**2022**	**2023**	**2024**	**2025**	**Jan to June 2026**
Powder coated standard finish	[redacted]				
Sales revenue powder coated high-performance finish					
Sales revenue anodised					
Total further processed goods sales revenue					
Percentage change on previous year					
[redacted] **Sales revenue (NZ$)**	**2022**	**2023**	**2024**	**2025**	**Jan to June 2026**
Anodised and powder coated sales revenue	[redacted]				
Percentage change on previous year					
[redacted] **Sales revenue (NZ$)**	**2022**	**2023**	**2024**	**2025**	**Jan to July 2026**
Powder coated	[redacted]				
Anodised					
Fabricated					
Total further processed goods					
Percentage change on previous year					

Table 7 – Further processed goods sales revenue for [redacted]

Mill-finish and further processed goods sales revenue

99. [redacted] all demonstrate declining mill-finish and further processed goods sales revenue from 2022 to 2025:

[redacted]

- [redacted]sh and further processed goods sales revenue declined by [redacted] per cent, from $[redacted] in 2022 to $ [redacted]in 2025.
- [redacted]ish and further processed goods sales revenue declined by [redacted] per cent, from $[redacted] in 2022 to $ [redacted]in 2025.
- [redacted] mill-finish and further processed goods sales revenue declined by [redacted] per cent, $[redacted] in 2022 to $ [redacted]in 2025.

[redacted] **Sales revenue (NZ$)**	**2022**	**2023**	**2024**	**2025**	**Jan to June 2026**
Mill-finish and further processed goods	[redacted]				
Percentage change on previous year					
[redacted] **Sales revenue (NZ$)**	**2022**	**2023**	**2024**	**2025**	**Jan to June 2026**
Mill-finish and further processed goods net of freight	[redacted]				
Percentage change on previous year					
[redacted] **Sales revenue (NZ$)**	**2022**	**2023**	**2024**	**2025**	**Jan to July 2026**
Mill-finish and further processed goods	[redacted]				
Percentage change on previous year					

Table 8 – Mill-finish and further processed goods sales revenue for [redacted]

4.3.5 Market share[27]

100. This section considers any changes to the share of the New Zealand market, shared between the domestic industry and importers.

[redacted]

[27] See Appendix 8: Source for domestic production data and total NZ market data.

101. The domestic industry's share of the New Zealand market was 64 per cent in 2022, 61 per cent in 2023, 58 per cent in 2024 and 62 per cent in 2025.

Measure	2022	2023	2024	2025
Total domestic industry (kg)	15,013,677	11,322,877	10,620,742	10,143,599
Imports by the domestic industry (kg)	493,427	1,028,190	199,292	123,735
Total imports (kg)	8,388,289	7,230,931	7,608,154	6,287,251
Total domestic market (kg)	23,401,966	18,553,808	18,228,896	16,430,850
Imports as a share of the domestic market	36%	39%	42%	38%
Domestic production as a share of the domestic market	64%	61%	58%	62%

Table 9 – Market share

4.3.6 Profit

102. To understand any profit changes, the MBIE considered earnings before interest and tax (EBIT).

Mill-finish goods profit

103. [redacted] saw declining profit (EBIT) for mill-finish goods from 2022 to 2025:

- [redacted] finish goods EBIT declined by [redacted] per cent, from $[redacted] 2022 to $[redacted] 2025.
- [redacted] ere unable to confirm output figures provided [redacted] only related to mill-finish goods.
- [redacted] mill-finish goods EBIT declined from $[redacted] 2022 to $[redacted] 2025.

[redacted] EBIT (NZ$)	2022	2023	2024	2025	Jan to June 2026
Mill-finish goods	[redacted]				
[redacted] EBIT (NZ$)	2022	2023	2024	2025	Jan to July 2026
Mill-finish goods	[redacted]				

Table 10 – Profit for mill-finish goods fo[redacted]

Further processed goods profit

104. [redacted]aw declining profits from 2022 to 2025 for further processed goods:

- [redacted]her processed goods EBIT declined from $[redacted] in 2022 to a loss of $[redacted] in 2025.
- [redacted]ata specific to further processed goods was not provided.
- [redacted] further processed goods EBIT declined by [redacted] per cent, from $[redacted] in 2022 to $[redacted] in 2025.

[redacted]

[redacted] EBIT (NZ$)	2022	2023	2024	2025	Jan to June 2026
Powder coated standard finish	[redacted]				
Powder coated high-performance finish					
Anodised					
Total further processed goods					
[redacted] EBIT (NZ$)	2022	2023	2024	2025	Jan to July 2026
Powder coated	[redacted]				
Anodised					
Fabricated					
Total EBIT for further processed goods					

Table 11 - Profit for further processed goods for [redacted]

Mill-finish and further processed goods profit

105. [redacted] all stated declines in mill-finish and further processed goods (EBIT) from 2022 to 2025:

- [redacted] mill-finish and further processed goods EBIT declined by [redacted] per cent, from $[redacted] 2022 to $[redacted] 2025.
- [redacted] mill-finish and further processed goods EBIT declined by [redacted] per cent, from $[redacted] 2022 to $[redacted] 2025.
- [redacted] Stated mill-finish and further processed goods EBIT declined from $[redacted] 2022 to [redacted] 2025.

[redacted]

[redacted] EBIT (NZ$)	2022	2023	2024	2025	Jan to June 2026
Mill-finish and further processed goods	[redacted]				
[redacted] EBIT (NZ$)	2022	2023	2024	2025	Jan to June 2026
Mill-finish and further processed goods	[redacted]				
[redacted] EBIT (NZ$)	2022	2023	2024	2025	Jan to July 2026
Mill-finish and further processed goods	[redacted]				

Table 12 – Mill-finish and further processed goods profit for [redacted]

4.3.7 Productivity

106. Productivity indicators for [redacted] as reported, were mixed. Note the figures included below are as reported to MBIE, including reference to "hours worked" and "man hours".

- [redacted]ctivity increased by [redacted] per cent, from [redacted] kg per hour worked in January to June 2022 to [redacted] kg per hour worked in January to June 2026.
- [redacted]ge productivity declined by [redacted] per cent, from [redacted] kg per man hour at year end 31 March 2023 to [redacted] kg per man hour at year end 31 March 2025.
- [redacted] Extrusion, caustic, die correction, and packing productivity declined by [redacted] per cent, from [redacted] kg per man hour in 2022 to [redacted] kg per man hour in 2025.

[redacted]

[redacted] Productivity	H1 2022	H2 2022	H1 2023	H2 2023	H1 2024	H2 2024	H1 2025	H2 2025	H1 2026
kg per hour worked	[redacted]								
Percentage change on previous period									

Table 13 – Productivity for [redacted]

[redacted] Productivity	2022/23	2023/24	2024/25		
Average kg per man hour	[redacted]				
Percentage change on previous year					

Table 14 – Productivity for [redacted]

[redacted] Productivity	2022	2023	2024	2025	Jan to Jun 2026
kg per man hour	[redacted]				
Percentage change on previous year					

Table 15 – Productivity for [redacted]

4.3.8 Employment

107. [redacted] all experienced declines in employment over the investigation period, noting each business reports employment differently.

- [redacted]loyees at period end declined by [redacted] per cent, from [redacted] at year end 2022 to [redacted] at FY 25. [redacted] also provided additional employment figures. MBIE were unable to confirm what these figures represent but have included them for completeness.
- [redacted]oyees at period end declined by [redacted] per cent, from [redacted] at 31 March 2023 to [redacted] at 31 March 2025.
- [redacted] Full time equivalent (FTE) employees declined by [redacted] per cent, from [redacted] FTEs in 2022 to [redacted] FTEs in 2025.

108. Note that employees involved in the extrusion process typically work shifts, which are adjusted according to output demands. Accordingly, total employee figures do not necessarily reflect total hours worked.

[redacted]

[redacted] Employment	FY 22	FY 23	FY 24	FY 25	
Employees at period end	[redacted]				
Percentage change on previous year					
[redacted] Employment	2022	2023	2024	2025	Jan to June 2026
Employees	[redacted]				
Percentage change on previous year					
[redacted] Employment	2023	2024	2025		
Employees at period end	[redacted]				
Percentage change on previous year					
[redacted] Employment	2022	2023	2024	2025	Jan to June 2026
Employment in FTE	[redacted]				
Percentage change on previous year					

Table 16 – Employment for [redacted]

4.3.9 Utilisation of production capacity

109. [redacted] all experienced declining utilisation of production capacity over the period of investigation:

- [redacted] declined from [redacted] per cent in 2022 to [redacted] per cent in 2025, a decrease of [redacted] percentage points.
- [redacted] declined from [redacted] per cent in 2022 to [redacted] per cent in 2025, a decrease of [redacted] percentage points.
- [redacted] Utilisation declined from [redacted] per cent in 2022 to [redacted] per cent in 2025, a decrease of [redacted] percentage points.

110. MBIE understands theoretical production capacity figures relate to total theoretical extrusion capacity which includes the extrusion of goods which are out of scope (for

[redacted]

example, windows and doors). Utilisation figures do not capture production of goods that are out of scope of the investigation. Capacity utilisation figures are only reflective of the production of goods that are in scope; figures are not reflective of total actual plant utilisation of all types of extrusion. The trend therefore, rather than any single figure, is illustrative.

[redacted] **Utilisation of production capacity (kg)**	**2022**	**2023**	**2024**	**2025**
Plant production capacity	[redacted]			
Total extruded				
Capacity utilisation				
[redacted] **Utilisation of production capacity (kg)**	**2022**	**2023**	**2024**	**2025**
Plant production capacity	[redacted]			
Total extruded				
Capacity utilisation				
[redacted] **Utilisation of production capacity (kg)**	**2022**	**2023**	**2024**	**2025**
Plant production capacity	[redacted]			
Total extruded				
Capacity utilisation				

Table 17 – Utilisation of production capacity for [redacted]

4.3.10 Price undercutting

111. Price undercutting occurs when imported goods are sold at prices below the domestic industry's prices. To understand whether price undercutting is occurring, the actual average domestic selling price is compared to the import price at the same level of trade.

112. Note that due to data limitations in import data, MBIE cannot determine which consignments are for mill-finish goods, and which consignments have had further processing. Analysis in this section is based on aggregated import data.

[redacted]

Price undercutting of mill-finish goods

113. For mill-finish goods, imported mill-finish goods undercut the selling prices of [redacted] and [redacted]

- [redacted] undercutting of mill-finish goods ranged from [redacted] per cent to [redacted] per cent from 2022 to 2026.
- [redacted] undercutting of mill-finish goods stayed steady at about [redacted] per cent apart from 2024 where it was [redacted] per cent.
- [redacted] price undercutting of mill-finish goods ranged from [redacted] per cent to [redacted] per cent.

	2022	2023	2024	2025	2026
[redacted]	[redacted]				
[redacted]					
[redacted]					
Imports ex-wharf price per kg (NZ$)					

Table 18 – Average selling price of mill-finish goods for [redacted] compared to import ex-wharf price per kg

	2022	2023	2024	2025	2026
[redacted]	[redacted]				
[redacted]					
[redacted]					

Table 19 – Price undercutting for mill-finish goods as a percentage

Price undercutting of further processed goods

114. For further processed goods, imported mill-finish goods consistently undercut the selling prices of goods produced by [redacted]

- [redacted] undercutting of further processed goods ranged from [redacted] per cent to [redacted] per cent.
- [redacted] undercutting of further processed goods ranged from [redacted] per cent to [redacted] per cent.
- [redacted] price undercutting of further processed goods ranged from [redacted] per cent to [redacted] per cent.

115. Although average domestic selling prices generally increased over the period of investigation, imported goods continued to enter the market at lower prices. Prices of

[redacted]

imported goods ranged from $[redacted]/kg to $[redacted]/kg, while domestic selling prices ranged from approximately $[redacted]/kg to $[redacted]/kg.

	2022	2023	2024	2025	2026
[redacted]	[redacted]				
[redacted]					
[redacted]					
Imports ex-wharf price per kg (NZ$)					

Table 20 – Average selling prices of further processed goods for participating industry compared to imports ex-wharf price per kg

	2022	2023	2024	2025	2026
[redacted]	[redacted]				
[redacted]					
[redacted]					

Table 21 – Price undercutting for further processed goods for [redacted]

4.3.11 Price depression

116. Price depression occurs when businesses are unable to raise their prices.

Price depression of mill-finish goods

117. [redacted] all report price increases over the period of investigation, with [redacted] in 2023.

(NZ$/kg)	2022	2023	2024	2025	2026
[redacted]	[redacted]				
[redacted]					
[redacted]					

Table 22 - Ex-factory selling price for [redacted]

Price depression of further processed goods

118. [redacted]eported variability in the average prices of further processed goods:

[redacted]

- [redacted]rienced an [redacted] in average selling prices from $[redacted]/kg in 2022 to $[redacted]/kg in 2025, before prices [redacted] to $[redacted]/kg in 2026.
- [redacted]ienced a [redacted] in selling prices from $[redacted]/kg in 2022 to $[redacted]/kg in 2023, a decrease of approximately [redacted] per cent. However, prices [redacted], reaching $[redacted]/kg in 2026.
- [redacted] experienced a consistent [redacted] in selling prices throughout the period of investigation, with average selling [redacted] from $[redacted]/kg in 2022 to $[redacted]/kg in 2026, [redacted] of approximately [redacted] per cent.

119. The broader evidence suggests that imports did not cause a sustained decline in selling prices across [redacted]

(NZ$/kg)	2022	2023	2024	2025	2026
[redacted]	[redacted]				
[redacted]					
[redacted]					

Table 23 – Average further processed goods selling price for [redacted]

4.3.12 Price suppression

120. Price suppression occurs when businesses are prevented from raising their prices to cover rising costs, and their profit margins narrow.

Price suppression of mill-finish goods

121. Across the industry, over the period of investigation, average selling prices of mill-finish goods increased from $[redacted], [redacted] of approximately [redacted] per cent while average production costs increased from $[redacted], an increase of approximately [redacted] per cent.

122. We note that these numbers are based on figures from the participating industry, and are a simple average.

123. Although the domestic industry increased selling prices during the period of investigation, these increases did not keep pace with rising production costs. Production costs rose faster than selling prices, resulting in the participating industry's margins declining from $[redacted]/kg to $[redacted]/kg, a reduction of [redacted] per cent.

124. Specifically;

- [redacted] by [redacted] per cent, while production costs increased by [redacted] per cent.
- [redacted] percent, while production costs increased [redacted] per cent.
- [redacted] prices [redacted] by [redacted] per cent, while production costs increased by [redacted] per cent.

[redacted]

	2022	2023	2024	2025	2026
Ex-factory selling price (NZ$/kg)	[redacted]				
Cost of production (NZ$/kg)					
Margin (NZ$/kg)					
Margin %					
Changes over period of investigation	**Selling price**	[redacted]			
	Cost of production	[redacted]			

Table 24 – Selling price of mill-finish goods, costs of production and marg[redacted]

	2022	2023	2024	2025
Ex-factory selling price (NZ$/kg)	[redacted]			
Cost of production (NZ$/kg)				
Margin (NZ$/kg)				
Margin %				
Changes over period of investigation	**Selling price**	[redacted]		
	Cost of production	[redacted]		

Table 25 - Selling price of mill-finish goods, costs of production and margi[redacted]
(figures at year end 31 March)

[redacted]

	2022	2023	2024	2025	2026
Ex-factory selling price (NZ$/kg)	[redacted]				
Cost of production (NZ$/kg)					
Margin (NZ$/kg)					
Margin %					
Changes over period of investigation	**Selling price**	[redacted]			
	Cost of production	[redacted]			

Table 26 - Selling price of mill-finish goods, costs of production and margins for [redacted]

Price suppression of further processed goods

125. For further processed goods [redacted] reported price increases but that these price increases failed to keep up with increased production costs;

- [redacted] by [redacted] per cent, while production costs increased by [redacted] per cent.
- [redacted] percent, while production costs increased [redacted] per cent.
- [redacted] Prices [redacted] by [redacted] per cent, while production costs increased by [redacted] per cent.

[redacted]

	2022	2023	2024	2025	2026
Ex-factory selling price (NZ$/kg)	[redacted]				
Cost of production (NZ$/kg)					
Margin (NZ$/kg)					
Margin %					
Changes over period of investigation	**Selling price**	[redacted]			
	Cost of production	[redacted]			

Table 27 – Selling price of further processed goods, costs of production and margins for [redacted]

	2022	2023	2024	2025	2026
Ex-factory selling price (NZ$/kg)	[redacted]				
Cost of production (NZ$/kg)					
Margin (NZ$/kg)					
Margin %					
Changes over period of investigation	**Selling price**	[redacted]			
	Cost of production	[redacted]			

Table 28 – Selling price of further processed goods, costs of production and margins for [redacted]

	2022	2023	2024	2025	2026
Ex-factory selling price (NZ$/kg)	[redacted]				
Cost of production (NZ$/kg)					
Margin (NZ$/kg)					
Margin %					
Changes over period of investigation	**Selling price**	[redacted]			
	Cost of production	[redacted]			

Table 29 – Selling price of further processed goods, costs of production, and margins for [redacted]

4.3.13 Injury incurred by [redacted]

126. MBIE verified the data provided by the participating industry. [redacted] although a member of ALENZ and supportive of the application for a safeguard measure chose not to participate in the investigation. [redacted] did however, provide MBIE with some data. This data has not been verified but has been included below to give a more fulsome picture of the experience of the domestic industry.

[redacted]

127. In the data provided to MBIE, [redacted] reported;

- Sales output [redacted] by [redacted] per cent, from [redacted] kg in 2023 to [redacted] kg in 2025.
- Sales revenue [redacted] by [redacted] per cent, from $[redacted] in 2023 to $ [redacted] in 2025.
- MBIE has not independently assessed market share as an injury factor for [redacted] Market share analysis for the domestic industry is captured in section 4.3.5 above.
- Profit (measure in EBIT) [redacted] by [redacted] per cent, from $[redacted] in 2023 to $ [redacted] in 2025.
- Productivity [redacted] by [redacted] per cent, from [redacted] kilograms per FTE in 2023 to [redacted] kilograms per FTE in 2025.
- Employment [redacted] by [redacted] per cent, from [redacted] FTE employees in 2023 to [redacted] FTE employees in 2025.
- Capacity utilisation [redacted] from [redacted] per cent in 2023 to [redacted] per cent in 2025.
- Price undercutting – [redacted]
- Price depression - [redacted] average ex-factory selling price [redacted] from $[redacted]/kg in 2023 to $[redacted]/kg in 2025. Although selling prices [redacted] to $[redacted]/kg in 2026, they remained [redacted] per cent [redacted] 2023 levels.

[redacted]

- Price suppression - [redacted] average ex-factory selling price [redacted] from $[redacted]/kg in 2023 to $[redacted]/kg in 2026, a [redacted] of [redacted] per cent. Over the same period, average ex-factory production costs [redacted] from $[redacted]/kg to $[redacted]/kg, an [redacted] of [redacted] per cent. Margins [redacted] over this period as well, which is reflected in [redacted]

	2023	2024	2025	Jan to July 2026
Sales output (kg)	[redacted]			
Percentage change on previous year				
Sales Revenue (NZ$)				
Percentage change on previous year				
EBIT (NZ$)				
Percentage change on previous year				
Productivity - kg per FTE				
Percentage change on previous year				
Employment - FTE				
Percentage change on previous year				
Plant Production Capacity (kg)				
Capacity Utilisation				

Table 30 – Injury data for [redacted] (unverified) [61]

	2022	2023	2024	2025	Jan to July 2026
Average selling prices – mill-finish (NZ$)	[redacted]				
Imports ex-wharf price per kg					
Price undercutting (%)					

Table 31 – [redacted] average selling prices of mill-finish goods compared to import ex-wharf price per kg (unverified)

[redacted]

	2023	2024	2025	2026
Ex-factory selling price	[redacted]			
Percentage change on previous year (%)				

Table 32 – [redacted] ex-factory selling prices from 2023 – 2026 (unverified)

	2023	2024	2025	2026
Selling price (per unit)	[redacted]			
Total production costs - ex-factory				
Margin				
Margin %				

Table 33 – Selling price of mill-finish goods, total production costs, and margin for [redacted] (unverified)

[redacted]

128. [redacted] is supportive of ALENZ's application. Throughout the investigation it only provided a very small amount of information to MBIE through a combined ALENZ submission on provisional safeguard measures.[62] [redacted] also participated in a joint cross-industry verification meeting and provided production estimates to support the initiation application. [redacted] described the injury being experienced by the domestic industry being:

[redacted]

129. [redacted] It considers the prospect of this in the current environment to be unlikely, and it [redacted][64]

130. MBIE supplemented qualitative submissions from [redacted] with information from publicly available sources. [redacted] public filings describe it as a New Zealand-incorporated, ASX/NZX-listed group involved in the sale and distribution of steel and metal products across New Zealand and Australia.

131. The company's reportable segments are "Steel and Metals", with the "Metals" segment including stainless steel, engineering steel, and aluminium. Aluminium covers internally extruded standardised and customised products plus third-party aluminium sheet, plate and coil product. This makes it difficult for MBIE to distinguish what element of [redacted] information relates specifically to its aluminium extrusion business.

132. [redacted] publicly available data indicates that market conditions between 2022 and 2025 were challenging, with declining sales volumes, revenue weakness and a substantial reduction in profitability. Although sales volumes and revenue appeared to stabilise in

[redacted]

2025, the available data does not indicate a return to the earnings levels observed in 2022. Notwithstanding these conditions, [redacted] continued to undertake significant capital investment throughout the period, suggesting an ongoing commitment to maintaining and developing its operational capabilities across its business.

Metric	2022	2023	2024	2025
Sales Revenue (NZ$)	$1,109,000	1,155,000	1,006,000	1,009,000
Percentage change on previous year		4.1%	(12.9%)	0.3%
Adjusted EBITDA	231,000,000	184,000,000	130,000,000	113,000,000
Percentage change on previous year		(20.6%)	(29.2%)	(13.1%)
Sales volume (t)[65]	257,287	239,958	221,171	227,902
Percentage change on previous year		(6.7%)	(7.8%)	3.0%
Customers Transacted	11,974	12,324	17,134	36,320
Percentage change on previous year		2.9%	39.0%	112.0%

Table 34 – [redacted] sales revenue, profit, sales volume and customers transacted for mill-finish goods (from publicly available material)[67]

4.3.14 Summary of injury

133. The investigation into whether the domestic industry is experiencing serious injury or a threat of serious injury found:

- From 2022 to 2025, [redacted] reported declines in sales output, sales revenue, profit, employment and utilisation of production capacity. Productivity was variable wi[redacted]creasing productivity, and [redacted] decreasing productivity.
- [redacted] reported increased sales output, sales revenue, productivity and capacity utilisation from 2023 to 2025, but reported declines in EBIT and employment.
- From 2022 to 2025, the price effects analysis shows that for [redacted] and [redacted]
    - Imports undercut the prices of domestically produced extrusions.
    - Domestic prices increased.
    - Domestic prices increased at a rate substantially slower than cost increases, leading to erosion of profit margins.

[redacted]

- [redacted] available data (which MBIE has not verified and relates to [redacted] indicated sales revenue and sales volume was steady from 2022 to 2025, with declines in EBITDA.

4.4 Imports by the domestic industry

134. Section 13(3) outlines that;

"In investigating whether the increased imports have caused serious injury or a threat of serious injury for the purposes of subsection (1)(a), the chief executive must consider-

(a) The nature and extent of imports of the goods by the domestic industry, including the value, quantity, frequency, and purpose of the imports; and

(b) factors other than the imports that have injured, or are injuring, the domestic industry."

4.4.1 Nature and extent of imports of the goods by the domestic industry

135. [redacted] and [redacted] all import some aluminium extrusions. MBIE has relied upon Customs data for analysis of the value, quantity, and frequency analysis of the imports of goods by the domestic industry.

Value, quantity, and frequency

136. The average value per kilogram of goods imported by the domestic industry ranged from $[redacted]/kg to $[redacted]/kg over the period of investigation. The value of imported goods was lowest in 2023, at $[redacted]/kg, before it rose through 2024 and peaked in 2025, at $[redacted]/kg.

NZ$	2022	2023	2024	2025	Jan to July 2026
[redacted]	[redacted]				
[redacted]					
[redacted]					
[redacted]					
Total	4,218,288.00	7,677,611.00	1,495,026.00	1,119,059.00	454,711.00
Average import price/kg (domestic industry)	[redacted]				

Table 35 - Value of domestic market imports (NZ$)[68]

137. Total volume of goods imported by the domestic industry varied from 1,028,190 kg in 2023 to 123,735 kg in 2025. Figure 6 shows that imports from the domestic industry spiked in 2023 but have fallen from 2023 to 2025. [redacted] accounted for much of the spike in 2023, with [redacted] per cent of imports.

[68] New Zealand Customs Service. (2026). Confidential trade data showing imports against tariff items 76042100 00B and 76042909 00F. Unpublished.

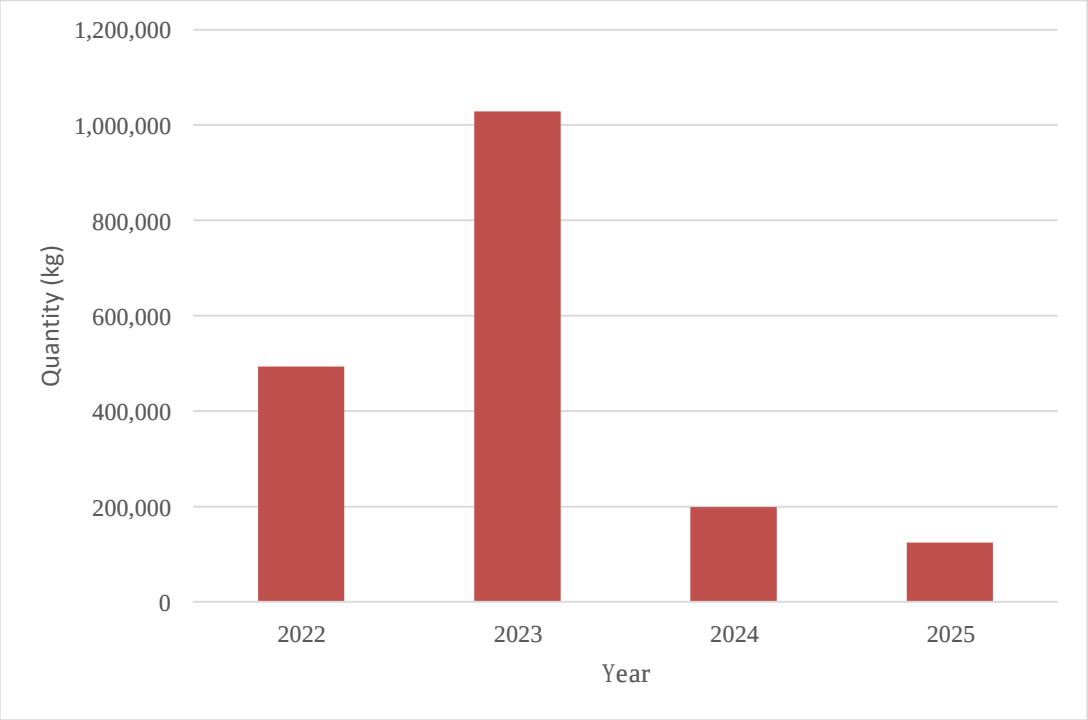

Figure 6 – Imports by the domestic industry (kg)[69]

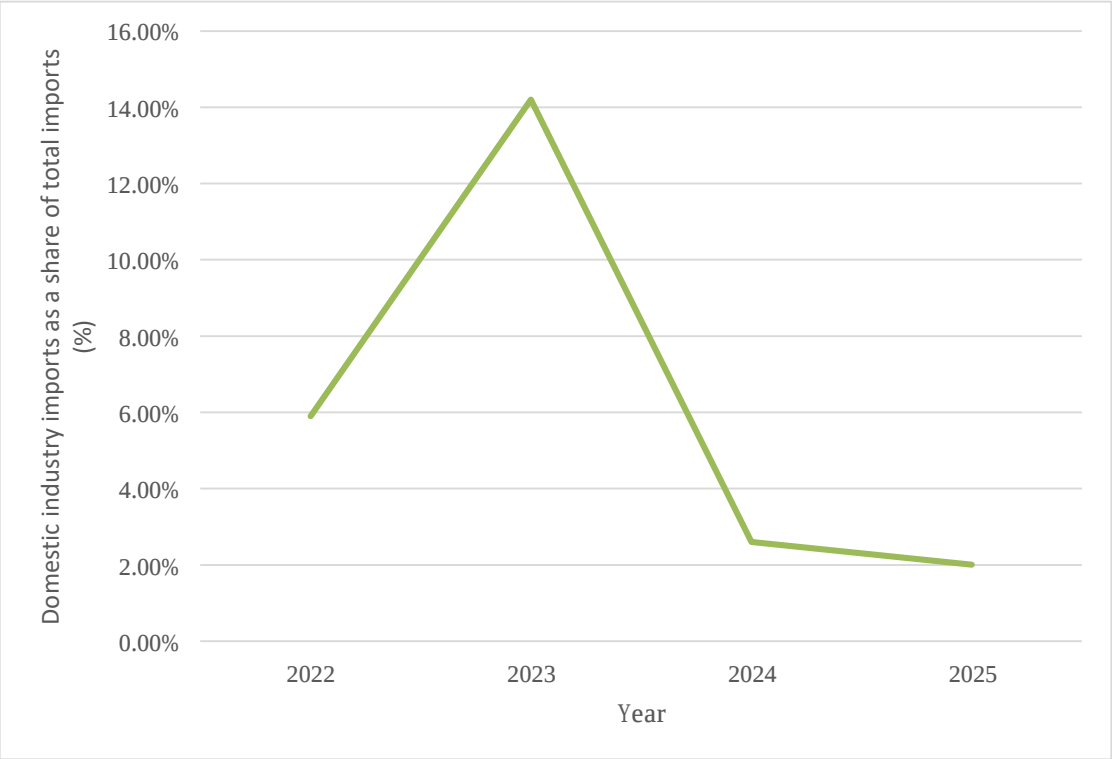

Figure 7 - Domestic industry imports as a share of total imports (%)[70]

[69] New Zealand Customs Service. (2026). Confidential trade data showing imports against tariff items 76042100 00B and 76042909 00F. Unpublished.

[70] New Zealand Customs Service. (2026). Confidential trade data showing imports against tariff items 76042100 00B and 76042909 00F. Unpublished.

Purpose

138. [redacted] reports that it imports goods that require a die larger than its press. Other reasons include the finish not being locally available or not running a specific alloy type.

139. [redacted] in response to the domestic manufacturer's questionnaire, reported its imports of goods as "[redacted] describing the importation of one shape, that it can [redacted]

140. [redacted] evidence that it imports oversized goods that cannot be extruded locally and according to specific customer requirements.

141. [redacted] not provide any data or information on the purpose of its imports.

Summary of goods imported by the domestic industry

142. In analysing the data on value and quantity of imports together, the high import volumes of goods observed in 2023 look likely to have been made up of lower-priced imports as the average import value was low during this period (detailed in Table 35 above).

143. The scale that the industry imported goods in 2022 and 2023, combined with evidence that it is importing goods that it is not technically capable of producing, limits its arguments that the increase in imports has caused serious injury. This is mitigated somewhat by reductions in import volumes from 2024 to 2026 and an increase in the value of the imported goods.

4.5 Factors other than imports that have injured or are injuring the domestic industry

144. MBIE has identified the following factors other than imports that have injured or are injuring the domestic industry:

- a contracting domestic market
- efficiency losses through throughput reduction
- increasing costs, and
- domestic competition.

145. These factors have been identified based on submissions to the investigation, from [redacted] and other interested parties, as well as MBIE's own research.

4.5.1 Contracting domestic market

The domestic market for aluminium extrusions contracted by 29.8 per cent from 2022 to 2025

146. Domestic production of extrusions has declined due to a contracting market, with this contraction likely caused by factors other than imports, namely weaker demand in the construction sector and in the broader New Zealand economy.

147. The domestic market for extrusions contracted by 29.8 per cent from 2022 to 2025. Both the import of extrusions and domestic production for domestic sale have declined during this period. In particular:

- Total New Zealand market, including imports, declined from 23,401,966 kg in 2022 to 16,430,850 kg in 2025, representing a 29.8 per cent decline over this period. [71]
- Domestic production declined from 15,013,677 kg in 2022 to 10,143,599 kg in 2025, representing a 32.4 per cent decline over this period. [72]
- Imports declined from 8,388,289 kg in 2022 to 6,287,251 kg in 2025, representing a 25 per cent decline over this period. [73]

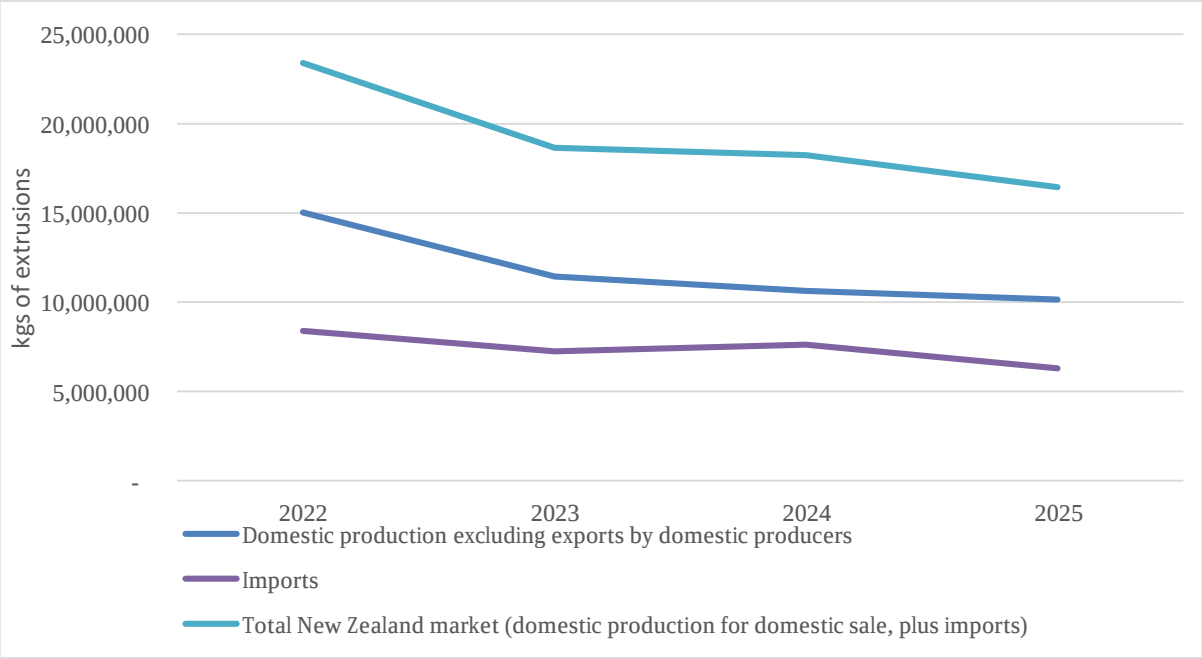

Figure 8 – Changes to the New Zealand market over the period of investigation, including imports (kg) [74]

The market contraction is consistent with data showing weaker economic activity in the sectors that purchase extrusions

148. From 2022 to 2025, there were declines in the rate of building consents issued. The construction sector is a key end user of extrusions, so it is reasonable to expect that a declining construction sector would impact the market for aluminium extrusions.

[71] See Appendix 8: Source for domestic production data and total NZ market data.
[72] See Appendix 8: Source for domestic production data and total NZ market data.
[73] See Appendix 8: Source for domestic production data and total NZ market data.
[74] See Appendix 8: Source for domestic production data and total NZ market data.

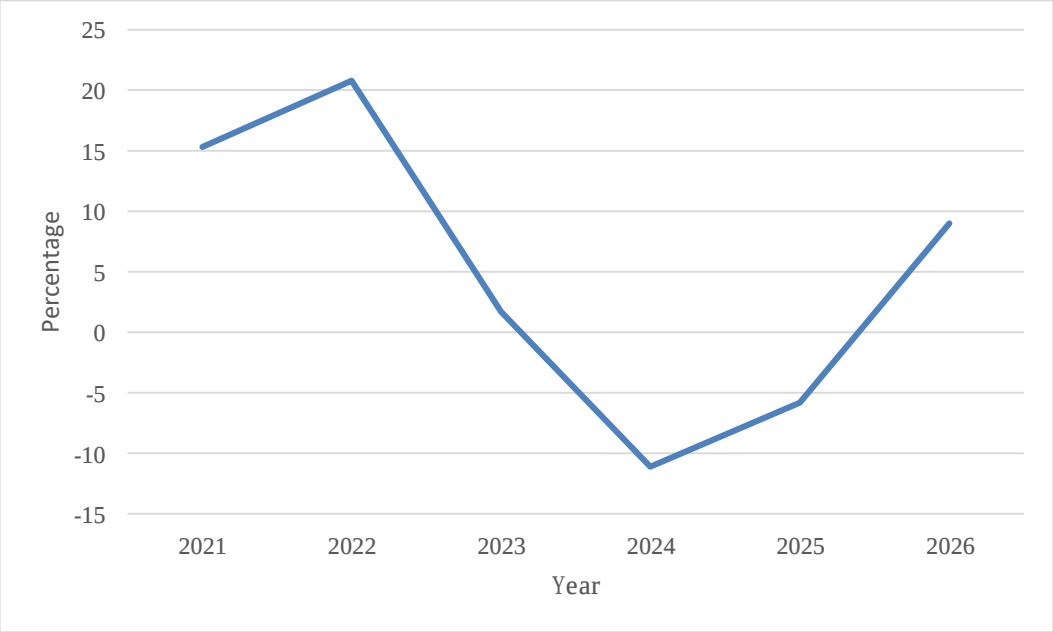

Figure 9 – Building consents issued, percentage change from same period of previous year[75]

149. From 2022 to 2025, there were also declines in production-based GDP growth rates. This indicates reduced demand for extrusions across other sectors that purchase extrusions.

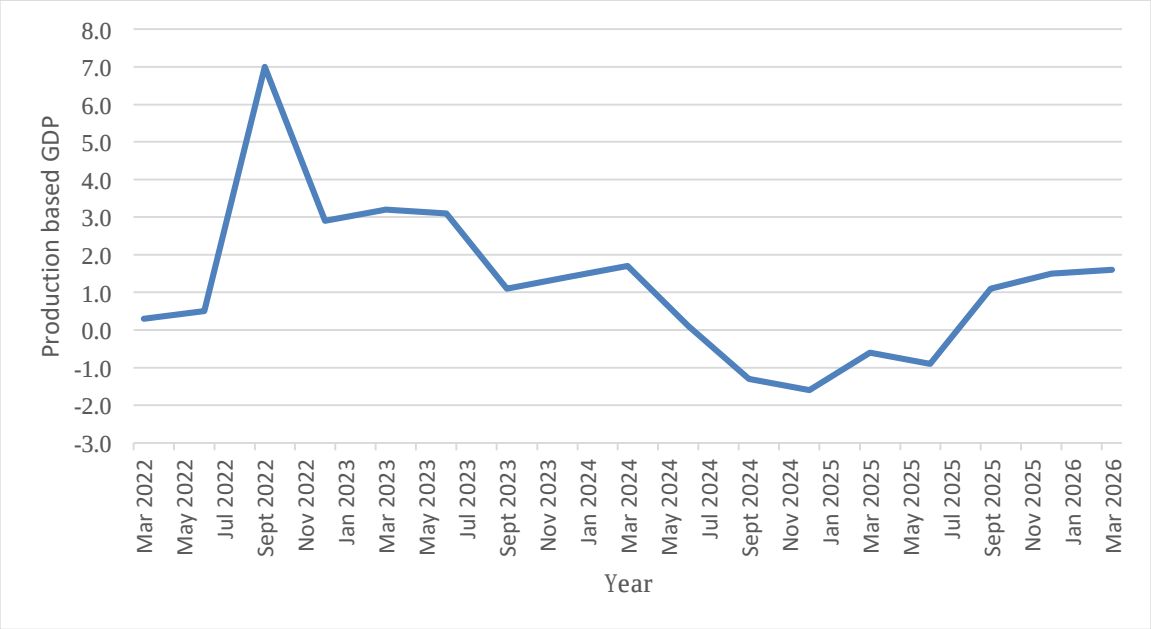

Figure 10 - New Zealand production-based gross domestic product (real y/y%) [76]

The scale of the injury caused by the declining market can be illustrated through an assessment of the counterfactual

150. A market contraction of 29.8 per cent over three years is significant and highly likely to have caused injury to domestic producers independent of any injury caused by imports.

[75] Stats NZ. (2026, June 3). Building consents issued: April 2026. Building consents issued: April 2026 | Stats NZ

[76] Reserve Bank of New Zealand. (2026). Gross Domestic Product (M5). Gross Domestic Product (M5) - Reserve Bank of New Zealand - Te PÅ«tea Matua

Reduced output causes injury through reduction in revenue, reduction in total profits and reduction in per unit profits due to efficiency losses (efficiency losses are discussed further below).

151. The scale of this injury caused by the market contraction can be illustrated by comparing actual domestic production in 2023, 2024 and 2025 with a theoretical level of domestic production assuming the New Zealand market remained at its 2022 size and domestic producers retained their actual market share in each year. These differences are outlined in Table 36 below.

152. The calculations show that if the market had not contracted as it did from 2022 to 2025, New Zealand producers would likely have produced an additional 3 million kg in both 2023 and 2024 and an additional 4.3 million kg of extrusion in 2025. These calculations are theoretical and illustrative only.

Measure	2022	2023	2024	2025
Total domestic industry (kg)	15,013,677	11,422,877	10,620,742	10,143,599
Imports (kg)	8,388,289	7,230,931	7,608,154	6,287,251
Total NZ market (kg)	23,401,966	18,653,808	18,228,896	16,430,850
Imports as % of total NZ market	36%	39%	42%	38%
Domestic production as % of total NZ market	64%	61%	58%	62%
Theoretical domestic production assuming the NZ market remained at its 2022 size and domestic producers retained their actual market share through subsequent years	15,013,677	14,330,467	13,634,739	14,447,224
Theoretical domestic production lost to total NZ market contraction (kg)		2,907,590	3,013,997	4,303,625

Table 36 – Calculated loss in domestic output due to domestic market contraction [77]

153. This scale of injury caused by the contracting market to individual producers can be illustrated using calculated counterfactuals in Tables 37, 38, and 39 below. These tables estimate lost profit due to market contraction, assuming actual market share and reported EBIT per kg.

154. This counterfactual analysis highlights that irrespective of any loss of market share due to imports, a meaningful degree of injury is likely to have been caused by the declining size of the total New Zealand market.

155. Calculations likely underestimate the scale of the loss of profits due to declines in EBIT per kg. EBIT per kg would be expected to be higher where production levels are higher due to production efficiencies.

[77] See Appendix 8: Source for domestic production data and total NZ market data. Percentages may not sum precisely due to rounding.

Measure	2022	2023	2024	2025
NZ production lost to total NZ market contraction (kg)		2,907,590	3,013,997	4,303,625
Actual market share of domestic industry	[redacted]			
Lost production due to market contraction				
EBIT ($/kg) [78]				
Estimated loss of profit due to market contraction ($)				

Table 37 – [redacted] lost profits from market contraction[79]

Measure	2022	2023	2024	2025
NZ production lost to total NZ market contraction (kg)		2,907,590	3,013,997	4,303,625
Actual market share of domestic industry	[redacted]			
Lost production due to market contraction				
EBIT ($/kg) [80]				
Estimated loss of profit due to market contraction ($)				

Table 38 - [redacted] lost profits from market contraction[81]

Measure	2022	2023	2024	2025
NZ production lost to total NZ market contraction (kg)		2,907,590	3,013,997	4,303,625
Actual market share of domestic industry	[redacted]			
Lost production due to market contraction				
EBIT ($/kg) [82]				
Estimated loss of profit due to market contraction ($)				

Table 39 – [redacted] lost profits from market contraction[83]

4.5.2 Efficiency losses due to throughput reduction

156. As well as reducing total revenue and profits, a contraction in the New Zealand market is likely to have contributed to lower profitability by causing efficiency losses.

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78 [redacted]

79 Figures may not sum precisely due to rounding.

80 [redacted]

81 Figures may not sum precisely due to rounding.

82 [redacted]

83 Figures may not sum precisely due to rounding.

157. Producers submitted that extrusion operations benefit from higher throughput, as larger production volumes support economies of scale and more efficient utilisation of plant and labour. This means that as output declined, these efficiencies are reduced, increasing costs on a per kilogram basis.

158. Losses in production efficiency are consistent with the injury data provided, which shows declines in profitability per kilogram over the period (noting profitability losses can also have a range of other causes).

159. Production efficiency losses may also have been caused by both the contracting domestic market as discussed above, declines in production for export, with export volumes declining from 3.34 million kg in 2022 to 1.49 million kg in 2025, and lost market share to imports discussed in the preceding section.

Export Volumes (kg)	2022	2023	2024	2025
[redacted]	[redacted]			
[redacted]				
[redacted]				
Total export volumes	3,339,847	2,426,905	1,881,551	1,491,512

Table 40: Export volumes for [redacted]

160. MBIE recognises that the injury indicators examined in this investigation relate only to the domestic production and sale of the subject goods and therefore do not directly capture the effects of changes in export production.

161. However, given the importance of high factory throughput for efficiency, declining production of all types of extrusion caused by declining export sales may also have reduced economies of scale and operational efficiency across producers' operations. This may have resulted in higher costs per kilogram than would otherwise have occurred.

162. Accordingly, contractions in the domestic market, alongside declining export volumes, have likely contributed to lower profitability per kilogram during the period, suppressing economies of scale. These effects are independent of any effect caused by increased imports.

4.5.3 Increasing Costs

Costs have increased during the investigation period

163. Producer costs generally increased during the period:

- in absolute terms (see Table 41)
- as a proportion of price (see price depression and price suppression analysis in sections 4.3.11 and 4.3.12 above)
- faster than inflation (CPI) (see comparison of Table 41 to Table 42).

164. These costs increases are illustrated in Table 41 below. We note that these increases are explained in part by higher fixed costs per unit resulting from declining output.

[redacted]

165. Costs incurred in producing extrusion include:

- **Billet costs:** Billet is typically the largest single input cost to aluminium extrusion production. Billet costs are driven by global aluminium prices (London Metal Exchange), the Main Japanese Ports premium (MJP), the product premium, the exchange rate, and scrap recycling savings.
- **Labour costs**: Labour costs include extrusion press operators and other production employees. Producers reported labour cost increases arising from wage inflation, minimum wage increases and broader labour market pressures.
- **Energy costs:** Energy costs comprise electricity and gas used in the extrusion process and generally account for a small proportion of production costs. Producers reported significant increases in electricity and gas prices during the period.
- **Other operating costs:** Other operating costs include packaging, freight, transport, tooling, maintenance, repairs, insurance, corporate and other overhead expenses. Producers reported increases across a range of these cost categories during the period.

[redacted] Total cost ($/kg)	**2022**	**2023**	**2024**	**2025**
Weighted average cost per kg	[redacted]			
Percentage change on previous year				
[redacted] Total cost ($/kg)	**2022**	**2023**	**2024**	**2025**
Total costs per kg	[redacted]			
Percentage change on previous year				
[redacted] Total cost ($/kg)	**2022**	**2023**	**2024**	**2025**
Total average cost per kg	[redacted]			
Percentage change on previous year				

Table 41 - Costs per kilogram of goods for [redacted]

Energy costs have increased

166. Many submitters, both from the domestic industry, and exporters and importers, highlighted that energy costs had increased during the period of the investigation. Domestic producers noted that energy costs make up a relatively small proportion of total costs. Given the scale of submissions pointing to energy as a form of injury, MBIE has considered a counterfactual scenario where energy prices increase with inflation.

[redacted] ng template for various extrusions. Provided in September 2026.
[redacted] or Safeguard Action by calendar years 2022 to 2025. Provided in September 2026.
[87] [redacted] September. 5.5.9. 10. Costing template for industrial shapes incl VA. Provided in September 2026.

167. MBIE compared data provided by domestic producers on their energy costs to energy costs increasing at the same rate as inflation, to illustrate the impacts of energy cost increases.

	2022	2023	2024	2025
CPI	7.2%	4.7%	2.2%	3.1%

Table 42 – Inflation over the period of investigation[88]

Measure	2022	2023	2024	2025
Energy prices per kg (NZ$)	[redacted]			
Energy costs (NZ$)				
CPI (%)	7.2%	4.7%	2.2%	3.1%
Energy rising at CPI (NZ$/kg)	[redacted]			
Output (kg)				
Estimated additional energy costs above inflation (NZ$)				

Table 43 – Costs [redacted]er the period of investigation, including the difference of cost increases at CPI and actual cost increases[89]

Measure	2022	2023	2024	2025
Energy prices per kg (NZ$)	[redacted]			
Energy costs NZ($)				
CPI (%)	7.2%	4.7%	2.2%	3.1%
Energy rising at CPI (NZ$/kg)	[redacted]			
Output (kg)				
Estimated additional energy costs (NZ$)				

Table 44 – Costs [redacted]er the period of investigation, including the difference of cost increases at CPI and actual cost increases[90]

[88] Stats NZ. (July 21, 2026). Consumer price index (CPI). Consumers price index (CPI) | Stats NZ

[redacted]

Measure	2022	2023	2024	2025
Energy prices per kg (NZ$)	[redacted]			
Energy prices (NZ$)				
CPI (%)	7.2%	4.7%	2.2%	3.1%
Energy rising at CPI (NZ$/kg)	[redacted]			
Output (kg)				
Estimated additional energy costs (NZ$)				

Table 45 – Costs for [redacted] over the period of investigation, including the difference of cost increases at CPI and actual cost increases[91]

Other raw materials costs have increased

168. The domestic industry noted that the landed cost of billet is the most significant cost driver in their operations, accounting for between 65 to 80 per cent of the manufactured cost of like goods. The domestic industry provided evidence of the costs relating to the London Metal Exchange (LME) cost of billet, MJP premium (the Main Japanese Port premium, an extra cash charge added to the base LME price for physical aluminium delivered to major ports in Japan), billet premium, exchange rates and landed billet cost for New Zealand producers.

169. Landed billet prices increased from approximately $4.00 to 4.60 a kg during 2022-2024 to over $7.00/kg in mid-2026. These increases indicate substantial cost pressure arising from raw material inputs and represent a factor that may have adversely affected the domestic industry's cost of production independently of imports.

170. MBIE considers that rising raw material costs placed significant upward pressure on the domestic industry's production costs during the period of investigation. However, despite these increasing costs, due to a competitive environment, the domestic industry was unable to increase selling prices to a corresponding extent. Cost increases substantially exceeded selling price increases, resulting in a deterioration in profit margins, as discussed in the section 4.3 above.

171. Changes to the billet price are a significant determinant of price and profitability in the production of aluminium extrusions. MBIE notes however, that submissions point out that billet is traded in global markets, and that production of goods overseas would face the same cost pressure. MBIE is cautious about drawing a conclusion that increasing billet prices are a cause of injury independent of competition with imports.

Cost increases are likely to have caused injury as distinct from any injury caused by imports

172. Producers submitted that injury has arisen because increased import competition has constrained their ability to pass higher costs through to customers.

173. The data shows that:

[redacted]

- the domestic industry has been unable to increase its prices to accommodate the increase in costs (see section 4.3.12 on price suppression above) and,
- some of those costs increased significantly above inflation, where imports are unlikely to have faced comparable increases.

174. Cost increases are likely to have caused injury. MBIE acknowledges that some of this injury may have been caused by an inability to increase prices due to import competition. However, as some of the increases in costs exceed the rate of inflation, and may not have been experienced by overseas producers, MBIE concludes that some of the injury is likely attributable to increasing costs independent of imports.

4.5.4 Domestic competition

175. The participating industry highlighted that competition among domestic aluminium extrusion producers is robust, with the respective market share of domestic producers changing over the period of investigation.

176. Data provided by the industry shows that [redacted] market share from 2022 to 2025, while [redacted] appear to have [redacted] market share, with [redacted] increasing its share by approximately ten percentage points, as shown in Table 46 below.

177. It is likely that some of the declines in EBIT seen with [redacted] are at least partially attributable to domestic competition, and the reconfiguration of competition in the domestic market.

	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
2022	[redacted]				
2023					
2024					
2025					

Table 46 – Domestic market share as percentages [92]

4.5.5 Summary of factors other than imports that have injured, or are injuring, the domestic industry

178. MBIE concludes that the following factors other than imports are likely to have injured, or are injuring, the domestic industry:

- **Contracting market size** – the New Zealand market for aluminium extrusions contracted by 29.8 per cent from 2022 to 2025, consistent with declines in sectors that purchase extrusions (illustrated by declines in building consent and GDP data). This contraction is likely to have caused injury through loss of output/sales and total profits.
- **Efficiency losses due to throughput reduction** – declining output for both domestic sale and export reduced production volumes and factory throughput. This likely resulted in efficiency losses, higher costs per kilogram, and lower profitability for domestic producers, independent of the effects of increased imports.

[92] See Appendix 8: Source for domestic production data and total NZ market data.

- **Increasing costs** – Some production costs have increased above inflation over the period of the investigation. Injury is likely to have been caused by an inability to pass these increases in costs on to customers, eroding profit margins.
- **Domestic competition** – Market share between domestic producers evolved over the period. [redacted] market share to [redacted]. [redacted] are likely to have suffered injury due to loss of sales/outputs, with the competitive pressure across the domestic industry likely to have exerted pressure on profit margins.

4.6 Conclusion on increase in imports and causation and serious injury

179. Section 13(1)(a) of the Act requires the chief executive to investigate whether increased imports have caused serious injury or a threat of serious injury to the domestic industry. In doing so, MBIE has considered whether imports have increased, whether serious injury or threat of serious injury has occurred or is occurring, and the extent to which any injury is causally linked to those increased imports.

180. In relation to import volumes, the evidence shows that:

- Imports increased in absolute terms between 2015 and 2022 but have decreased in absolute terms since then.
- There was an increase in imports in absolute terms at the start of 2026, but it is too early to judge if that increase will form a trend.

181. In relation to the domestic industry's injury claims:

- MBIE has received financial data for three companies in the domestic industry, making up approximately [redacted] of New Zealand production, for the period 2022-2025, as requested, and some data for the start of 2026.
- During that time, [redacted] have demonstrated a clear and sustained deterioration across the injury factors identified in section 13(2).
- [redacted] also demonstrated declines in key indicators, noting MBIE only received summary data, and has not verified this information.
- [redacted] non-participating party to the investigation, did not provide MBIE with any material data to understand any injury impacts, other than production volumes which were included in the application. MBIE understands [redacted] approximately [redacted] per cent of the domestic market share in 2024. From publicly available information, MBIE understands [redacted] lower sales volumes, weaker revenue, and reduced profitability, but continued to invest heavily in capital projects.

182. The industry has also experienced price undercutting from imports, and price suppression. In this context, MBIE notes submissions from the industry arguing that imports have focused on high volume, low value trade such as standard shapes, while the domestic industry has focused on bespoke, higher cost segments of the market. MBIE considers therefore that undercutting is of limited value as a comparison in this instance.

183. Taken together, these factors demonstrate a significant overall impairment in the position of the domestic industry. MBIE concludes that the domestic industry is experiencing serious injury.

184. MBIE considers that the increased imports will have been one cause among many that has injured or is injuring the domestic industry.

185. MBIE particularly notes that:

- The increase in imports in the period for which the industry has demonstrated injury, is relatively modest and unlikely to account for the scale of injury stated.
- The domestic market reduced in size by approximately 30 per cent between 2022 and 2025.
- There is reported competition between domestic manufacturers, and evidence of a reconfiguration of the market, with [redacted] increasing their market share compared to [redacted].
- Exports from [redacted] reduced between 2022 and 2025.
- Lower output from lower demand, domestic competition and reduced exports (and competition from imports) has a compounding effect as manufacturers become less efficient resulting in lower profit per kilogram.
- Some cost increases in recent years have contributed to deterioration in profitability.

186. Accordingly, while imports have likely caused injury to the domestic industry, MBIE does consider that the injury the domestic industry has experienced from imports, in and of itself, has not met the threshold of "serious injury".

187. The evidence indicates that the combined effects of a contracting market, reduced exports, rising costs, reduced efficiency, and domestic competition are likely to have meaningfully contributed to the injury that the industry has experienced.

188. Accounting for those other sources of injury, MBIE therefore concludes that the injury that the domestic industry has experienced from imports, has not met the threshold of "serious injury". MBIE finds that, while serious injury is occurring, the requirements of section 13(1)(a) are not satisfied because the serious injury or threat of serious injury has not been caused by increased imports.

5. Unforeseen developments

190. Section 13(1)(b) of the Act requires the chief executive to investigate "*whether the increased imports were due to unforeseen developments*". The Act provides no further definition of unforeseen developments, or guidance on how to apply this section of the legislation.

191. There is no relevant New Zealand case law or precedent that can be drawn on for interpretive guidance. In the absence of relevant New Zealand case law, MBIE drew on the WTO Agreements, which are binding in and of themselves on New Zealand and corresponding jurisprudence on the application of unforeseen developments.

192. MBIE also reviewed Select Committee reports and the Hansard from the time of the Act's passing to support interpretation of Parliament's intent for the application of section 13(1)(b).

193. Drawing on the material outlined above, MBIE has identified the following key factors are relevant in assessing whether increased imports are due to unforeseen developments:

- **The development must be unforeseen in the eye of the competent authority on behalf of the Government of New Zealand** (i.e. the Crown). Jurisprudence points to the negotiators representing the Government needing to have reasonably foreseen developments that would later occur.
- **"unforeseen" is taken to mean that a development was unexpected at the point in time that New Zealand made a relevant trade commitment.** In this case, this is the combination of when the WTO was formed in 1995, at which time New Zealand made its bound tariff commitment, and subsequent relevant trade agreements with other trading partners. Given the profile of the imports of the goods relevant to this investigation, this is the China New Zealand Free Trade Agreement.
- **There must be a direct link between the identified development, and the increase in imports.** This is required in the Act by use of the phrase "due to", which is consistent with jurisprudence, which speaks of a logical connection between the unforeseen development and the connections set forward for the imposition of a safeguard measure.
- **The extraordinary nature of the safeguard measure must reflect the circumstances created by the unforeseen developments.** Jurisprudence comments on the 'emergency' nature of safeguard measures.

194. MBIE assessed these factors against the arguments received via submissions, including the application. MBIE has supplemented these arguments with its own desktop research. Appendix 9 contains further detail on from these sources and outlines how MBIE arrived at the four factors that it has used for analysis.

5.1 Arguments relating to unforeseen developments

5.1.1 Arguments from submissions

195. In its application, ALENZ makes the following points relating to unforeseen developments causing an increase in imports;

- *New Zealand is now unique among 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 New Zealand's value adding export sectors*
- *The EU raising safeguard tariffs on imported aluminium and steel from 25 per cent to 50 per cent in 2025.*
- *In 2026, the EU will introduce 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 players have recently entered the New Zealand aluminium distribution market*
- *There are new examples of some importers advertising specific alloys, delivering a different alloy, and supplying test certifications for a third alloy. Allegations have been made that test certificates for some products are dated on the day of sale, whereas tests should be 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 those exports.*

196. ALENZ argues that recent changes to building product regulation likely increased imports – including the import of what ALENZ allege are falsely or under-certified goods.

197. In later submissions, ALENZ made further points relating to "unforeseen developments", including that current events amount to "*a perfect storm on a global scale…*

- *Trump kicks off a cycle of tariffs in 2018*
- *Followed by massive decline in China construction activity*
- *Meaning vast excess extrusion capacity (7000 presses) unused*
- *Aluminium is heavily state subsidised and looking for other markets*
- *Export duty (30 per cent) on primary aluminium creates huge incentives to export extruded products rather than billet*
- *USA doubles down and increases tariffs again*
- *Europe, Canada, Australia & others implement trade measures to avoid destruction of their industries*
- *New Zealand stands alone in not acting"*

5.1.2 Assessment of arguments

198. MBIE considered these arguments qualitatively against the factors outlined above. Section 5.3 of this report includes quantitative analysis to consider the possibility that any of these identified developments caused trade diversion across the global economy.

Lack of duty for aluminium extrusions

199. ALENZ states that New Zealand does not have a duty on aluminium extrusions and infers that New Zealand's major trading partners have duties in place against aluminium extrusions.

200. New Zealand has a baseline duty in place against specified aluminium extrusions of five per cent, with a duty-free preferential rate from a wide range of import sources. In 2025, more than 99% of the imported goods entered duty free. MBIE does not have data on the volume of trade that is entering other markets free of duty.

201. Across the relevant tariff lines, major trading partners apply the following rates:

Country	Tariff line	MFN rate	Preferential rates
New Zealand	760421	5%	Generally free
	760429		
Australia[93]	760421	5%	Generally free under FTAs with some higher rates for developing countries
	760429		
United States[94]	760421	1.5%	Free under some programmes and trade agreements
	760429	2.6-5%	
Canada[95][96]	760421	Free	Free
	760429		
United Kingdom[97]	760421	6%	Free
	760429		
EU[98]	760421	7.5%	Generally free
	760429		

Table 47 – Rates on aluminium extrusions across major trading partners

202. While MBIE acknowledges that the list above does not include all of New Zealand's major trading partners, it illustrates that aluminium extrusions generally have low or zero baseline tariffs, with zero tariffs common when applying preference.

[93] Australian Border Force. Chapter 76: Aluminium and articles thereof. Retrieved September 23, 2026, from https://www.abf.gov.au/importing-exporting-and-manufacturing/tariff-classification/current-tariff/schedule-3/section-xv/chapter-76

[94] U.S. International Trade Commission. (2026). Harmonized Tariff Schedule of the United States (HTS). https://hts.usitc.gov/?query=760421

[95] Canada Border Services Agency. (2026). Customs Tariff 2026. Government of Canada. https://www.cbsa-asfc.gc.ca/trade-commerce/tariff-tarif/2026/menu-eng.html

[96] Canada Border Services Agency. (2026). Customs tariff 2026 (T2026, effective January 1, 2026) [PDF]. Government of Canada. https://www.cbsa-asfc.gc.ca/trade-commerce/tariff-tarif/2026/01-99/01-99-2026-eng.pdf

[97] HM Government. Trade tariff: Look up commodity codes, duty and VAT rates. GOV.UK. https://www.gov.uk/trade-tariff

[98] European Commission. TARIC consultation methodology (Integrated Tariff of the European Union). https://ec.europa.eu/taxation_customs/dds2/taric/taric_consultation.jsp?Lang=en

Ongoing trade disruption from the COVID-19 pandemic

203. The COVID-19 pandemic resulted in major trade disruptions across the world. MBIE understands that the dominant feature in COVID-19 related trade disruptions was delays and subsequent increases in costs of global production, and shipping delays.

204. MBIE considers that, while the impact of COVID-19 pandemic was disruptive and unforeseen, there is no evidence to suggest that it contributed directly to an increase in aluminium extrusions to New Zealand.

United States trade policy

205. ALENZ claims that changes in trade policy in the United States are an unforeseen development that has resulted in increased imports of aluminium extrusions through trade diversion. MBIE understands this claim to be about the 'Section 232' tariffs imposed by the Trump administration on steel and aluminium products. The timetable for those tariffs, imposed on all imports from all sources, on the tariff lines relevant to this investigation is outlined below;

Date	Tariff imposed
March 2018[99]	Established 10% tariffs, with some exemptions approved in subsequent years
February 2025	Increased tariffs to 25% and removed all exemptions
June 2025	Increased tariffs to 50%

Table 48 – Key United States tariff changes on the tariff lines relevant to this investigation

206. MBIE agrees that the New Zealand Government could not have reasonably foreseen the specific tariff rates on these products at the time of making trade liberalisation commitments – neither at the time that the WTO was established, nor any subsequent preferential agreements.

207. These developments, however, must be linked to an increase in imports to New Zealand in order to satisfy the test under the Act. See section 5.2 of this report for analysis on trade diversion.

Trade remedies across the world (particularly the European Union)

208. ALENZ describes the European Union's (EU) recent increase in safeguard duties on imported aluminium and steel as an unforeseen development that has led to an increase in imports in New Zealand through diversion of goods that now face higher duties in other markets.

209. MBIE has analysed the EU alongside other major trading partners and has identified significant and prolonged trade remedies on aluminium. Table 49 below illustrates only duties that are currently applied to imports of aluminium from China – it does not cover those that have expired without renewal. MBIE understands that there are other trade remedies on aluminium that apply to other countries – but has focused on imports from China given the prominence of trade remedies, and the profile of imports in New Zealand.

[99] Trump, D. J. (2018, March 8). Proclamation 9704: Adjusting imports of aluminum into the United States. In Compilation of Presidential Documents. Office of the Federal Register. https://www.govinfo.gov/app/details/DCPD-201800147

Authority	Exporting country	Measure taken	Relevant coverage	Duty rate	In force date
EU[100][101]	China	Anti-dumping	760421 760429	21.2% - 32.1%	March 2021
United Kingdom[102][103]	China	Anti-dumping	760421 760429	0% - 35.1%	December 2022
Canada[104][105]	China	Anti-dumping Countervailing	760421 760429	0% - 43% - 102% 0 - 15.84 CNY/kg	November 2008
United States[106]	China	Anti-dumping Countervailing	760421 760429	4.25% - 376.85% 14.56% - 168.81%	May 2011
Australia	China	Anti-dumping	760421 760429	0% - 29.4%	6 November 2009

Table 49 – Duties on relevant tariff lines across major trading partners

210. From desktop research, MBIE could not corroborate the assertion made by ALENZ that the EU had recently put in place and increased safeguard tariffs on aluminium from 25 per cent to 50 per cent. However, MBIE notes that a steel safeguard investigation[107] drew similar conclusions to those alleged.

211. MBIE notes the prolonged use of trade remedies on aluminium products across the world. There may be a case that such widespread and sustained use of remedies could be considered unforeseen. Section 5.3 below considers whether trade diversion as a result of these developments led to an increase in imports in New Zealand.

[100] Directorate-General for Trade and Economic Security. (2021, March 30). Commission imposes anti-dumping duties on imports of aluminium extrusions from China. European Commission. https://policy.trade.ec.europa.eu/news/commission-imposes-anti-dumping-duties-imports-aluminium-extrusions-china-2021-03-30_en

[101] European Commission. (2026). Trade defence investigations: AD664 Aluminium extrusions. https://tron.trade.ec.europa.eu/investigations/case-history?caseId=2449

[102] Trade Remedies Authority. (2026, June 22). AD0012: Aluminium extrusions from China. https://public-file.trade-remedies.service.gov.uk/case/ad0012

[103] World Trade Organization. (2022, December 16). 2021/088 CN: Investigation details. Trade Remedies Data Portal. https://trade-remedies.wto.org/en/antidumping/investigations/measures/gbr-2021088-cn

[104] Canada Border Services Agency. (2025, October 8). *Aluminum extrusions: Measures in force*. Government of Canada. https://www.cbsa-asfc.gc.ca/sima-lmsi/mif-mev/ae-eng.htm

[105] World Trade Organization. (n.d.). CAN-AD1379CN-1: Anti-dumping measure concerning aluminum extrusions from China. Trade Remedies Data Portal. https://trade- remedies.wto.org/en/antidumping/investigations/measures/can-ad1379cn-1

[106] International Trade Administration. (2024, September 27). Final determinations in the AD/CVD investigations of aluminum extrusions from multiple countries. U.S. Department of Commerce. https://www.trade.gov/final-determinations-ad-cvd-investigations-aluminum-extrusions-multiple-countries

[107] European Commission. (2025, March 24). *Commission Implementing Regulation (EU) 2025/612 of 24 March 2025 amending Commission Implementing Regulation (EU) 2019/159 imposing a definitive safeguard measure on imports of certain steel products*. *Official Journal of the European Union*, L 2025/612. https://eur-lex.europa.eu/eli/reg_impl/2025/612/oj/eng

EU Carbon Border Adjustment Mechanism (CBAM)

212. The CBAM seeks to ensure that the price of imports reflects their embedded carbon emissions to ensure that industrial goods imported to the EU compete fairly with the goods produced within the EU that are subject to the EU Emissions Trading Scheme.

213. Between 1 October 2023 and 31 December 2025, the regime was in a transitional phase, with importers required to share emissions data with the European authorities, but no payment due. The definitive regime, where payments for embodied carbon commenced, began on 1 January 2026.

214. MBIE understands that ALENZ's argument is that trade would be/has been diverted from the EU to other markets, including New Zealand as a result of CBAM.

215. MBIE considers it highly unlikely that the EU's imposition of CBAM led to an increased imports of aluminium extrusions to New Zealand during the investigation period, noting that the definitive regime has only been in place since 1 January 2026 which is after the investigation period so would not have caused a trade diversion leading to an increase in imports in New Zealand. Analysis on trade diversion is outlined below in section 5.2 of this report.

Allegations relating to moving capital out of China

216. In its application ALENZ alleges that specific Chinese manufacturers are focused on moving funds out of China. MBIE has interpreted this as follows:

- A Chinese exporter sells goods at a cheaper than commercial rate to a related importer/distributor in New Zealand
- That related importer/distributor then sells the goods in New Zealand at a competitive rate
- Exporting the goods for less than a commercial rate supports value extraction out of China, which is then realised by the importer/distributor – thereby helping "move funds out of China" on behalf of the exporter.

217. MBIE considers that the logic behind this argument is inconsistent with other petitioning that it has received from the domestic industry that imported goods are being sold in New Zealand for less than the cost of manufacturing the goods. Selling to the consumers in New Zealand at low costs would deteriorate the value extraction out of China. If the alleged below cost trade occurs right through to the consumer, then it would not be an effective strategy for value extraction out of China.

218. MBIE considers that there is no reliable evidence to validate these allegations, so has disregarded it.

Export incentives from the Government of China

219. ALENZ alleges that Chinese government export incentives paid to exports (up until November 2024) amount to an unforeseen development resulting in increased imports to New Zealand.

220. MBIE understands that the Government of China has provided/provides export tax rebates for listed goods. This policy is understood to be a financial instrument to support exports of goods. Submitters including China Non-Ferrous Metals Industry Association submitted that the export tax rebate was removed in late 2024. MBIE undertook independent research to confirm that on 15 November 2024, the Chinese Ministry of Finance and State Tax

Administration announced the cancellation of export tax rebates for listed aluminium products. This was effective on 1 December 2024.

221. There are two ways to interpret the argument raised by ALENZ. It could be that ALENZ is implying that the application of the tax rebate led to an increase in imports, or that the cancellation of the tax rebate for aluminium extrusions led to an increase in imports. MBIE has investigated both approaches. MBIE has also assessed if either of these developments could be considered unforeseen.

222. Export tax rebates have existed in China's general export tax system since 1985 and were incorporated into the modern VAT regime in 1994. The application of the full rebate (the rebate scheme that existed until November 2024) was from 1 February 2009, when the rebate for listed aluminium profiles/extrusions was increased to 13 per cent. The rate was increased to 16 per cent in later years, before being revised to 13 per cent after VAT reform in 2013.[108]

223. Before 2009, for a period of about 18 months from July 2007 to January 2009, China reduced or removed rebates on many aluminium and other resource intensive products.

224. Given the length of time that the export tax rebate scheme appears to have been in place, it is unlikely that there is a reasonable case to argue that the policy in China could have been unforeseen to the government of New Zealand. In particular, the substantive policy appears to have been in place before:

- New Zealand became a member of the WTO on 1 January 1995, and
- New Zealand agreed a bilateral Free Trade Agreement with China on 8 April 2008.

225. MBIE understands that the policy to remove the export tax rebate is itself exports-discouraging – that is, the rebate encouraged exports, so removing it was a net discourager. MBIE considers that the decision to remove the export tax incentive was unlikely to have led to an increase in imports.

226. Notwithstanding the further quantitative analysis that follows, it is possible that China's export tax rebates led to an increase in exports from China (and therefore imports in New Zealand) before it was removed. However, as noted above, given the length of time that the policy has been in place, it cannot have been unforeseen at the time that New Zealand made its trade liberalisation commitments.

New importers in New Zealand

227. MBIE considers that importers, or any other market participant, entering or exiting the market for aluminium extrusions in New Zealand is a feature of normal economic conditions. MBIE considers that a range of normal market conditions would have been anticipated when agreeing to the relevant trade concessions. Importers entering the market for aluminium extrusions in New Zealand is therefore not an unforeseen development.

[108] Ministry of Finance of the People's Republic of China, & State Taxation Administration of the People's Republic of China. (2009, March 27). Notice on increasing export tax rebate rates for light industry, textiles, electronics, and other products. https://www.chinatax.gov.cn/chinatax/n810341/n810765/n812166/200903/c1189479/content.html (Translated 30/08/26).

Allegations about certification

228. ALENZ has made a range of allegations about testing and certification of imported goods, including for example, falsification of testing certificates.

229. MBIE considers that there are other government mechanisms to address any concerns about fraudulent behaviour, including relating to testing and certification. In this safeguard investigation, MBIE does not have access to information that could support investigating whether any fraudulent behaviour or lack of certification has led to an increase in imports.

Building Act changes

230. McKechnie identifies that the *Building (Overseas Building Products, Standards, and Certification Schemes) Amendment Act 2025* (the Building Amendment Act) "create[ed] pathways for complex products such as aluminium windows and doors to enter New Zealand without having to meet New Zealand standards."

231. While, as outlined above, standards and conformity assessment is not in scope of this investigation, McKechnie's point is relevant in as much as it relates to whether the increase in imports is due to unforeseen circumstances.

232. The stated purpose of the Building Amendment Act when it was a Bill in Parliament was:

> *"to respond to competition issues in the sector by amending the Building Act 2004 to remove barriers to overseas building products entering New Zealand's building product market and being used in New Zealand buildings."*

233. The increase in imports of building materials after the passing of the Building Amendment Act was clearly a policy outcome intended by Parliament.

234. MBIE considers that the Building Amendment Act is not an unforeseen development. As outlined above, the Building Amendment Act responds to competition issues in the sector. The Government at the time of making trade concessions will have reasonably foreseen that policy measures may be taken to reduce the barriers for building materials. Lowering the cost of construction in New Zealand has been a long-standing policy objective of successive governments. For example, the Building Act 1991 sought to create a performance-based regulatory framework to enable greater use of alternative products and innovations, including overseas products. It was therefore foreseeable at the time the relevant concessions made were (namely 1995 when New Zealand acceded to the WTO) that the government may take further action to remove barriers to using overseas products.

235. MBIE notes that the quantum of the increase in imports could be an unforeseen development – that is, the government's response to a policy problem, results in an increase in imports which was unforeseen at the time that New Zealand made its trade concessions.

236. However, in the current case, the volume of imports noted in the first seven months of 2026 is of a similar scale to that seen in 2024. This suggests that the relative scale of the increase in imports potentially attributable to the Building Amendment Act, is not sufficient to itself meet the threshold for being an unforeseen development.

237. Any subsequent increases in imports after the Building Amendment Act was passed in April 2025 therefore cannot be an unforeseen development.

China construction industry contraction

238. ALENZ also made a series of further claims, broadly relating to softening demand in the Chinese construction sector leading to excess capacity of aluminium extrusions in the Chinese market.

239. In running a brief desktop exercise, a contraction in property investment and construction activity in China over recent years is observable. In 2023 Reuters reported that property investment activity in China fell in 2022 for the first time since 1999, and that new home starts in China fell 63 per cent from their peak in 2021, in the 12 months to April 2024. [109] That downturn appears to have persisted since then. [110]

240. Given how important the construction sector is as a user of aluminium extrusions, it is reasonable to infer that softening demand in the Chinese construction sector has likely led to a corresponding softening of demand for aluminium extrusions, particularly since 2022, leading to excess capacity.

241. Further, there are reasonable grounds to argue that such a development could have been unforeseen, given the reported scale of the contraction in building activity, and the size of the Chinese economy.

Summary of qualitative assessment

242. Having considered the points above qualitatively against the framework established, MBIE considers that there are reasonable arguments that the following developments can be considered unforeseen at the time that New Zealand made a commitment to trade liberalisation:

- prolonged use of trade remedies with respect to aluminium extrusions around the world
- specific tariff rate changes on these goods in the United States, and
- China's construction industry downturn since early 2021.

243. MBIE has assessed whether there is reasonable argument that those developments have led to an increase in imports in New Zealand in section 5.3 below.

244. MBIE considers it necessary to assess one further point that it considers is not an unforeseen development, as outlined above, quantitatively:

- legislative changes to the *Building (Overseas Building Products, Standards, and Certification Schemes) Amendment Act 2025* to lower barriers to further imports of building material.

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[109] Reuters. (2024, June 4). China sees property silver lining but can't shake Japan comparisons. Reuters. https://www.reuters.com/world/china/china-sees-property-silver-lining-cant-shake-japan-comparisons-2024-06-04/

[110] Reuters. (2023, January 17). China's 2022 property investment falls for first time since 1999. Reuters. https://www.reuters.com/world/china/chinas-2022-property-investment-falls-first-time-since-1999-2023-01-17/ ; Reuters. (2023, January 31). China home prices seen falling slightly less this year, property investment slump deepens: Reuters poll. Reuters. https://www.reuters.com/world/china/china-home-prices-seen-falling-slightly-less-this-year-property-investment-slump-2023-01-31/ ; Reuters. (2023, August 15). China's property investment falls 12% y/y in January-July. Reuters. https://www.reuters.com/world/china/chinas-property-investment-falls-12-yy-january-july-2023-08-15/.

5.2 Trade diversion

5.2.1 Assessing if unforeseen developments have led to an increase in imports

245. ALENZ and ALENZ members claim in various submissions, including the application, that various unforeseen developments have led to changes in trade patterns, such as trade diversion, which has led to an increase in imports to New Zealand.

246. Trade diversion is a quantifiable measure of an unforeseen development in overseas jurisdictions that could lead to an increase in imports in New Zealand.

5.2.2 MBIE considered trade flows of aluminium extrusions

247. MBIE has considered the best data reasonably available for reviewing trade of aluminium extrusions around the world. The most detailed trade data that is consistently available across markets for aluminium extrusions is at the HS6[111] level, across two identified tariff items. This is different to the data used to assess the increase in imports above, which covers trade at a more granular level, and has been assessed line-by-line for its relevance to this investigation. That level of granularity is not possible for assessing trade flows in other countries. For this section, we have taken a standard approach to use HS6 level trade flow data.

248. For consistency, and to make a reasonable comparison with trade flows in other countries, MBIE has used HS6 data from the same source when considering New Zealand imports. That means the graphs will necessarily look different to those in the preceding section.

249. Using HS6-level data provides a reasonable estimate, rather than a detailed accurate representation of trade flows in other markets.

5.2.3 Focus on selected markets

250. China is the primary source of imports of aluminium extrusions to New Zealand and is the primary focus of the domestic manufacturers' submissions. As such, MBIE has considered China's export volumes when considering arguments against unforeseen developments.

251. Further, MBIE has considered import data from Australia, the United States, Canada, and the EU, to assess any risk of trade displacement. It has been difficult to obtain reliable data on imports to the EU that exclude imports to the UK and MBIE note this is a limitation impacting interpretation over the 2020-2021 period.

5.2.4 China's exports of aluminium extrusions fluctuate seasonally, but are steady over the long term

252. The figure below illustrates China's exports to all destinations for aluminium extrusions. The figure illustrates that exports reduced over 2015-2016, and have been steady ever since, with a reduction in 2025-2026.

[111] HS refers the World Customs Organisation's Harmonized System (HS), which uses code numbers to define products. HS6 refers to a particular level of detail in the description of the product definition. Six-digit codes are the most detailed definitions where consistent data is unavailable.

253. The figure also illustrates seasonal variation, with February being a notably lower month of trade. MBIE understands that this typically reflects the Chinese New Year holiday period.

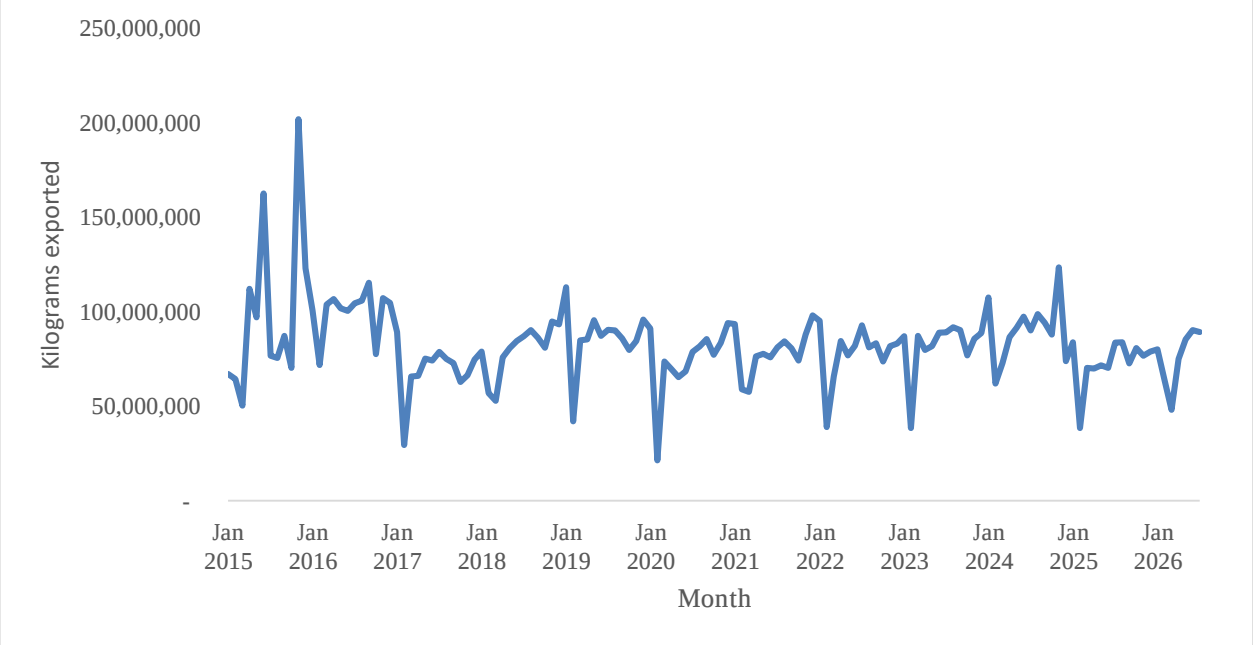

Figure 11: China exports to all destinations, 760421 and 760429[112]

5.2.5 Imports of aluminium in key markets

Imports from all destinations

254. The figure below (Figure 12) shows imports from all sources to the United States, Canada, and Australia, of aluminium extrusions by month.

[112] Trade data obtained from the Global Trade Atlas showing exports from China against tariff items 760421 and 760429

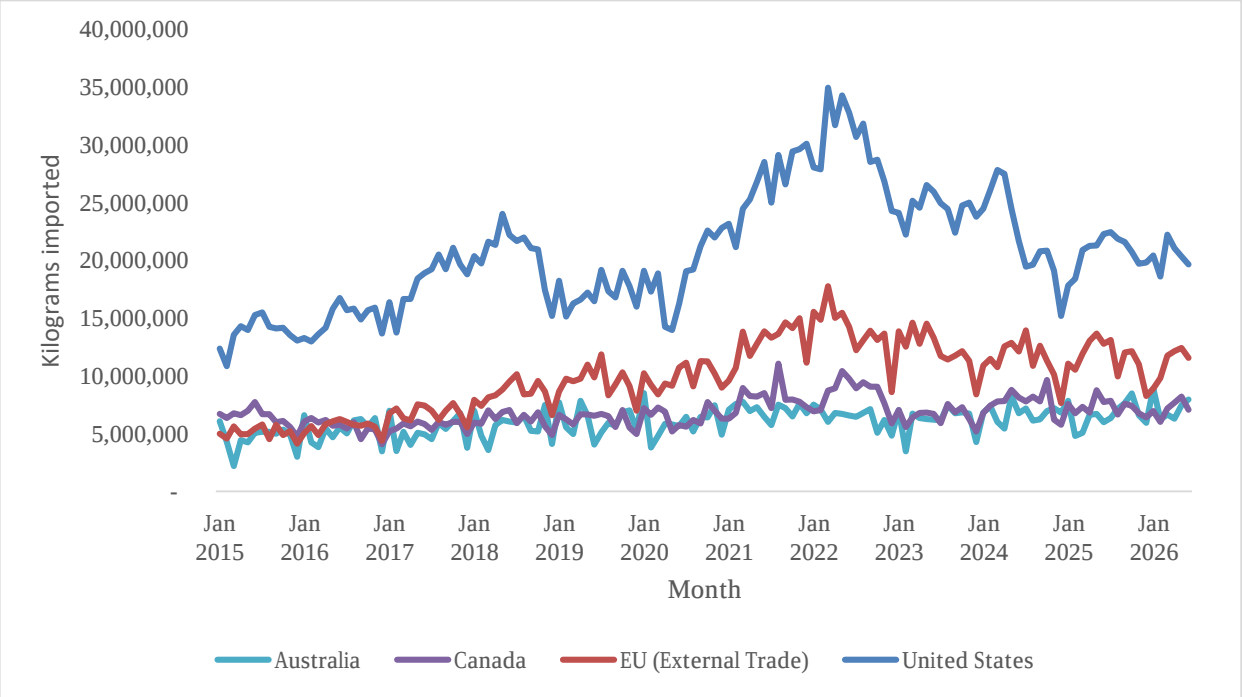

Figure 12- Imports of aluminium extrusions from all sources to the United States, Canada, the EU, and Australia, by month[113]

255. The figure shows a notable increase in imports to the United States and EU peaking in 2022, with a gradual fall since then. Imports to Canada and Australia have been slowly rising in aggregate, with a reduction in Canada in 2023.

Imports from China

256. Figure 13 considers those same import markets and considers imports only from China.

[113] Trade data obtained from the Global Data Atlas showing imports in selected countries against tariff items 760421 and 760429, from all sources.

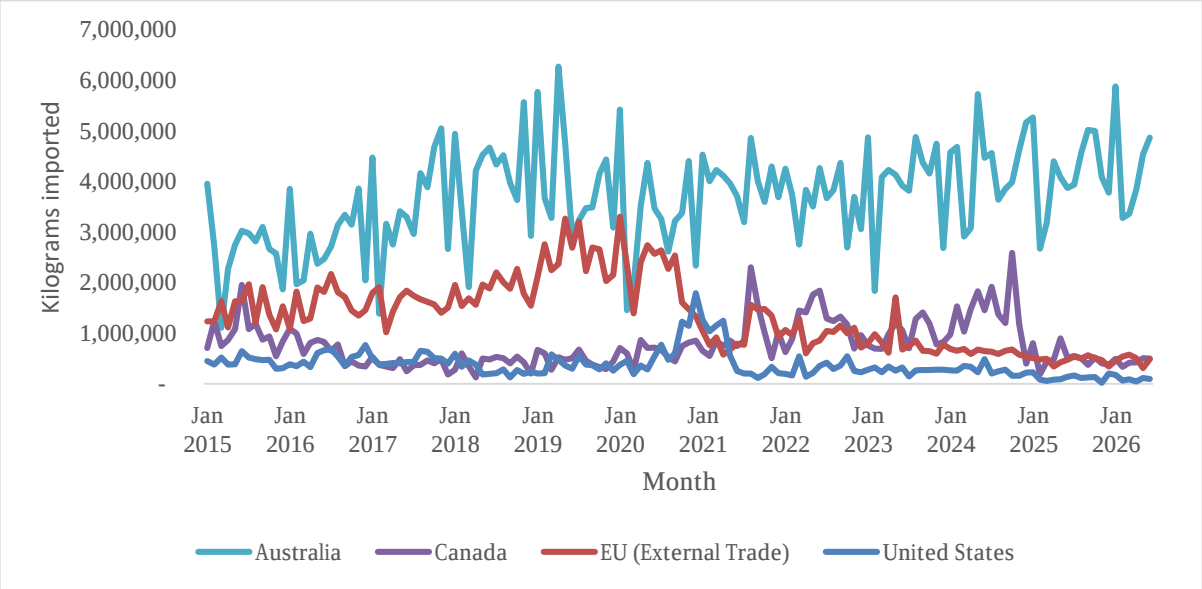

Figure 13 - Imports of aluminium extrusions from China to the United States, Canada, the EU and Australia by month

257. Figure 13 shows that:

- Australia is a significant importer of Chinese aluminium, relative to other large markets, and imports from China in Australia have gradually increased in the last 11 years.
- While the United States is a significant importer, it is not a major market for Chinese aluminium. Imports of Chinese aluminium in the United States peaked in 2021, then has gradually decreased.
- The EU was a major market for Chinese aluminium, but imports reduced after peaking in 2019-2020
- Canada has steadily grown its imports from China, with a significant peak at the end of 2024, and a decline in 2025.

258. There is a notable change in trade patterns from China to Canada in late 2024. Trade reduced from approximately 1.5 million kg per month in 2024, to 0.5 million kg per month in 2025. This change is likely due to the Canadian government imposing a 25% "surtax" on specified aluminium extrusions from China from 22 October 2024. [114]

5.2.6 Linking trade diversion to identified developments

United States' section 232 tariffs

259. There is no apparent direct link between the changes in United States' use of section 232 tariffs and its imports of aluminium extrusions – from either China or another source. The major tariff changes occurred in March 2018, February 2025, and June 2025. None of those times correspond to a notable reduction in imports in the United States. Indeed, after 2018, imports to the United States from both China and all markets increased.

[114] Department of Finance Canada. (2024). Final list of steel and aluminum products from China that will be subject to a 25 per cent surtax. Government of Canada. https://www.canada.ca/en/department-finance/news/2024/10/final-list-of-steel-and-aluminum-products-from-china-that-will-be-subject-to-a-25-per-cent-surtax.html

260. Juralco, an importer, submitted that *"The applicants infer that displaced product was redirected to other markets and that some of that volume entered New Zealand. However, that proposition is inconsistent with the evidence that import volumes into New Zealand have also decreased in absolute terms. Evidence of a reduction in volumes entering the United States, without evidence of corresponding volume increases in New Zealand, does not demonstrate that any displaced volume entered New Zealand, nor that it caused imports to account for a greater market share."*[115]

261. MBIE has done independent analysis and consider that there is no credible evidence to suggest that changes in the United States' tariff policy caused a trade displacement leading to a subsequent increase in imports in New Zealand.

Use of trade remedies globally

262. MBIE has not observed any risk of trade diversion resulting from trade remedies in key import markets of Chinese aluminium. Specifically:

- Australia imposed anti-dumping duties on Chinese aluminium in 2009 but has seen a gradual increase of imports from China, apart from short-term reduction in 2020. MBIE considers it is unlikely that the trade remedy action taken in Australia could have led to an increase in imports in New Zealand. MBIE has reached this conclusion because there is no apparent reduction in imports in Australia of aluminium from China, therefore it cannot conclude that the Australian trade remedy action could have led to a trade diversion resulting in an increase in imports in New Zealand.
- The EU and United Kingdom imposed anti-dumping duties on Chinese aluminium in 2021-2022. Trade data shows that the EU was decreasing its imports from China from 2019/2020. The imposition of a remedy could possibly have contributed to the further decline in imports of Chinese aluminium to the EU and UK after the fact. After 2021, imports of Chinese aluminium in New Zealand declined. It is unlikely therefore that the trade remedy action in the EU and United Kingdom could reasonably have led to an increase in imports in New Zealand.
- Canada has had anti-dumping and countervailing duties on Chinese aluminium since 2008. Despite those duties, imports of aluminium from China appears to have increased up to 2024, before decreasing in 2025. It is likely that the decrease in 2025 was due to the "surtax" policy, discussed above. Given the increase in imports from China in Canada up until the surtax was imposed in 2025, it is unlikely that this trade remedy action prompted a diversion of trade that led to an increase in imports in New Zealand.
- The United States has had anti-dumping and countervailing duties in place on Chinese aluminium since 2011. Its imports of Chinese aluminium gradually increased to 2020, then gradually declined, on volumes much lower than Australia and the EU. These changes in trade patterns do not align with the trade remedy action, nor the change in import patterns in New Zealand. It is therefore unlikely that the trade remedy action in the United States has led to an increase in imports in New Zealand.

[115] Juralco. Submission for New Zealand Safeguard Investigation into Certain Aluminium Extrusions | Juralco Aluminium Building Products Limited. Provided on 23 September 2025. Public file 099.

Construction activity in China

263. There is no apparent link with a reported reduction in construction activity in China leading to an increase in trade volumes. CNIA submits that *exports to New Zealand [from China] have declined more sharply than China's overall exports of aluminium extrusions, demonstrating that New Zealand is not becoming an alternative destination for Chinese exports*.[116]

264. As noted above, MBIE has done independent research and understands Chinese construction industry activity growth peaked in early 2021. After that time exports from China to all destinations remained steady, but for some seasonal variations and a reduction in 2025.

265. MBIE considers, therefore, that there is no credible evidence to suggest that the reduction in construction activity in China has led to an increase in export volumes from China. This therefore cannot have been a development that led to an increase in imports in New Zealand.

China export tax rebate

266. Given that China's exports of aluminium have remained fairly constant since 2016, MBIE considers that the export tax rebate is unlikely to have led to an increase in exports.

267. MBIE observes a short but notable fluctuation in November 2024, followed by a few months of lower trade volumes. MBIE understands that around this time that the Government of China announced the discontinuation of the export tax rebate. It is likely that there was a short-term rush of exports to take advantage of the policy before it was removed.

268. MBIE considers that there is no credible evidence to suggest that the policy's existence, or its removal, has led to a sustained increase in imports in New Zealand.

269. MBIE acknowledges that *exports from* China increased in November 2024 (see Figure 13 above), which could be as a result of the announcement that the export incentive was to be cancelled. This was followed by a decline in exports after December 2024. However, export volumes returned to a relatively steady state after several months, indicating that any impact from the removal of the export tax incentive was not long lasting.

Canada surtax on aluminium extrusions

270. As outlined above, MBIE observes that imports of Chinese aluminium to Canada reduced by about two thirds at the end of 2024 when the Canadian government announced an additional duty on such imports. MBIE notes that that trade volume has not recovered since.

271. It is possible to argue that the reduction in Chinese exports to another major market (Canada), prompted by the imposition of a tax on imports, is a development that would not have been foreseen by the New Zealand Government.

272. MBIE considers the link to imports in New Zealand in section 5.3.1 below.

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[116] China Nonferrous Metals Industry Association. Submission of Exporter Questionnaire and Annex by CNIA. Provided on 7 July 2026. Public file 074.

5.3 Linking to imports in New Zealand

273. For consistency with the analysis above, MBIE has used imports at the HS6 level. This is different to the data used in section 4.2 above.

274. Figure 14 below show imports to New Zealand from all markets, since 2015, across monthly and annual data.

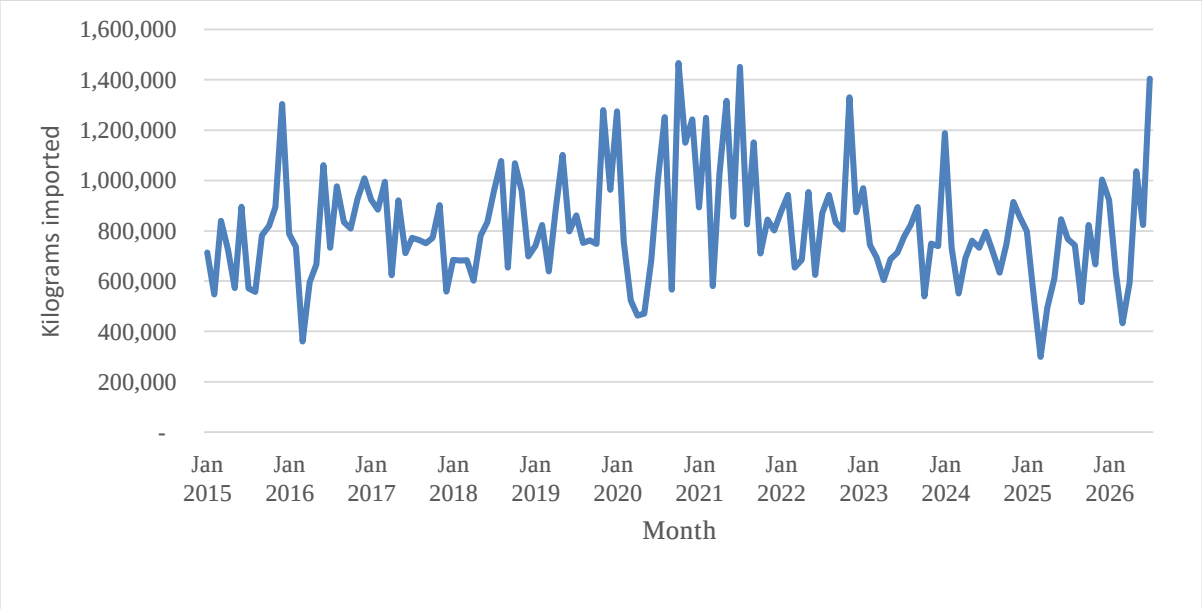

Figure 14 - Imports to New Zealand from all markets by month[117]

275. Figure 14 shows erratic trade volumes month-to-month, a gradual increase peaking in 2021, a reduction through to 2025, with an increase in 2026. While this analysis uses different data to the preceding section, the trends are similar.

276. When considering imports from China only, as shown in Figure 15 below, there is a clearly observable increase in imports in the period up to 2021, with a levelling off between 2021 and 2025, and a further increase in 2026. While based on different datasets, the observations here are broadly consistent with the analysis in section 4.

[117] Trade data obtained from the Global Data Atlas showing imports in New Zealand against tariff items 76 04 21 and 76 04 29 from all sources

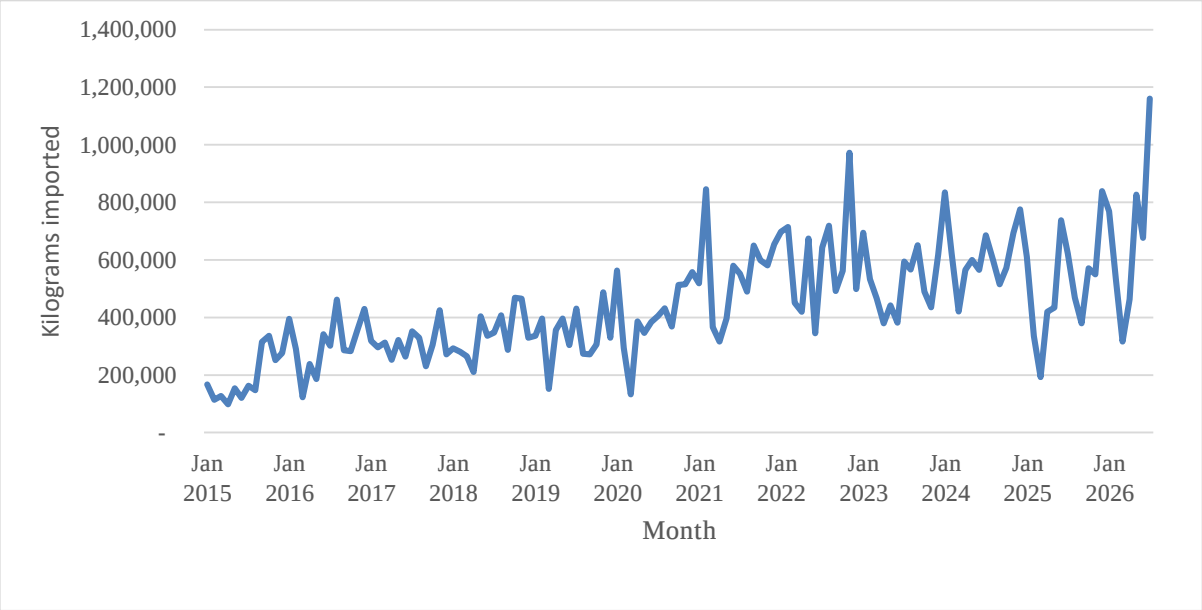

Figure 15 – Imports to New Zealand from China by month[118]

5.3.1 No evidence of Canadian surtax leading to increase in imports in New Zealand

277. The suggestion that the reduction in Chinese aluminium exports to Canada from late 2024 led to a subsequent diversion of these exports to New Zealand, is not substantiated by New Zealand's import data. Trade flow from China to New Zealand decreased from 2024 to 2025 – the period following the imposition of the Canadian surtax.

278. MBIE understands from the investigation that it is uncommon for producers of aluminium extrusions to hold significant inventory, and that product is generally made to order. Therefore, MBIE considers that the increase in 2026 is unlikely to be because of trade diversion from Canada's surtax imposition, its reduction in imports from China, and any subsequent trade diversion that may have occurred.

279. MBIE considers that there is no credible evidence that Canada imposing a surtax on Chinese aluminium in 2024 could have reasonably led to an increase in imports in New Zealand.

5.3.2 Impacts from legislative changes to the Building Act

280. In April 2025, legislation was introduced to amend the Building Act 2024 to reduce barriers and testing requirements for trusted overseas building materials. It is likely that the increase in imports observed from December 2025 to the end of the available data, was due to the lowering of barriers to bring in building materials.

281. Increases in imports of building materials after the passing of the Building Amendment Act is an intended policy outcome. The subsequent increases in imports cannot be unforeseen developments as any increased imports would indicate that the Building Amendment Act is working as intended.

[118] Trade data obtained from the Global Data Atlas showing imports in New Zealand against tariff items 76 04 21 and 76 04 29 from China only

5.4 Conclusion on unforeseen developments

282. MBIE has considered the following evidence, supplemented with independent research:

- the arguments in submissions and the application on why an increase in imports may have been due to unforeseen developments
- export data from China, and
- import data from New Zealand and other major global economies.

283. MBIE considers that the following developments are likely to have been unforeseen by the government of New Zealand when making trade liberalisation commitments:

- use of trade remedies on relevant tariff lines globally to the extent observed
- United States section 232 tariffs
- a Canadian "surtax" on imports of aluminium from China, and
- a reduction in construction activity in China to the extent observed.

284. However, MBIE has not found any direct link between any of the above developments and an increase in imports in New Zealand, in particular:

- Imports of aluminium in the United States, from all sources and specifically from China, peaked at a similar time as imports of aluminium in New Zealand, and have been gradually falling since.
- There is no apparent link between the trade remedy action across New Zealand's major trading partners and a subsequent change in trade patterns, that could have reasonably led to an increase in imports in New Zealand.
- Aluminium imports in Canada from China dropped after Canada imposed a "surtax" at the end of 2024, but MBIE considers that that development is unlikely to have reasonably led to an increase in imports in New Zealand, especially given imports in New Zealand decreased from 2024 to 2025.
- A decline in China's domestic construction activity from early 2021, and the subsequent reduction in domestic demand in China for aluminium extrusions has not led to an increase in exports from China, suggesting that there has not been a diversion of product from the domestic to export markets. Imports from China in New Zealand decreased after 2021.

285. Having considered the arguments made by the industry against the factors outlined at the start of this section, and detailed in Appendix 9, MBIE considers that any increase in imports, whether in absolute terms before 2021 and in 2026, or in relative terms between 2022 and 2025, has not been due to unforeseen developments.

6. Necessity of safeguard measure

6.1 Necessity of safeguard measures

286. The Act, under section 13(1)(c), outlines that the chief executive must investigate

> *"whether a safeguard measure is necessary –*
>
> *(i) to prevent or remedy serious injury;*
>
> *(ii) and to facilitate adjustment by the domestic industry to the increased competition from the increased imports."*

6.1.1 Prevention or remediation of serious injury

287. Section 4 outlines the investigation that MBIE has conducted under section 13(1)(a) of the Act. Section 4 concludes that a relative increase in imports is one factor among many that has caused injury to the domestic industry. While serious injury to the domestic industry has occurred, MBIE does not consider that the relative increase in imports has caused injury that can be considered as "serious injury" as defined in the Act.

288. By extension, MBIE concludes that imposition of a safeguard measure would likely improve the financial performance of the domestic industry by increasing the prices of competing imported goods. However, a safeguard measure cannot remediate the injury experienced from other sources, such as the contracting domestic market, poor export performance leading to lower throughput efficiencies, and increasing production costs.

6.1.2 Facilitation of adjustment by the domestic industry to the increased competition from the increased imports

289. The chief executive must investigate whether a safeguard measure is necessary to facilitate adjustment to the increased competition – i.e. whether the imposition of the safeguard is necessary to provide headroom to the domestic industry to make adjustments with the aim of becoming more competitive with imported goods.

290. To meet the test in this section, MBIE has looked for evidence suggesting that the domestic industry would use the temporary relief offered by a safeguard measure, to adjust to the competition from increased supply of imported goods.

291. A safeguard measure is intended to be temporary in nature (refer section 2.1.3, Purpose of the Act). The purpose of the measure would be defeated, if the domestic industry relied on the safeguard measure to remove import competition, rather than using the period to adjust to increased competition from imports. Adjustments should be designed to help businesses become more competitive with (i.e. adjust to) the increased competition from imports when the period for which a safeguard measure is imposed is over.

292. The domestic manufacturers questionnaire asked respondents to outline their plans for adjustment, including any long-term adjustment to production, any proposed investments, and any other business adjustment being considered.

293. [redacted] provided detail in their response to the domestic manufacturers questionnaire about future adjustment plans that would aid in making it more competitive against increased imports. These adjustment plans are mostly larger capital investments, and [redacted] was clear that it would need to have confidence that the investments were going to generate some return, before it could commit to making that investment.

294. The kind of investment mentioned was in, for example, additional extrusion capacity, automation projects, improved processing capability and equipment replacement. These are all investments that would be expected to improve productivity, increase throughput, or expand product offerings and thus improve competitiveness.

295. [redacted] stated that they would decarbonise at a faster rate, should a safeguard measure be imposed. This implies that, to some degree, [redacted] believes that decarbonising would allow it to become more competitive. McKechnie provided a submission to the Commerce Commission in 2025, now publicly available, relating to energy prices in which it characterised any decarbonisation investment as "negative/zero/near zero ROI"[119]. CNIA also noted the content of McKechnie's submission to the Commerce Commission in its submission.

296. Neither [redacted] describe the nature of any adjustment plans in their responses to the domestic manufacturers' questionnaire. [redacted] that it has already invested a substantial sum in [redacted] upgrades and [redacted], which has possibly helped it stay competitive to an extent.

297. In a further submission of 9 September 2026, [redacted]peated that it had already spent a significant sum on new [redacted] and [redacted] improvements in an attempt to adjust to increased competition from imports.

298. In this same submission of 9 September 2026[redacted] requesting a provisional duty request a tariff rate of 25 to 30 per cent to "deliver a more level playing field whilst allowing time for deeper evaluation of the injury being experienced and enabling time to design and implement a longer-term structure to protect this industry". MBIE notes, that any protection offered by a safeguard measure (provisional or otherwise) is temporary and not intended as a long-term solution to increased competition faced by the domestic industry from imported goods.

299. As outlined above, a safeguard measure would provide temporary relief from one of the sources of competition that the domestic industry faces, which in turn would likely improve the financial performance of that industry. The Act requires MBIE to investigate "whether a safeguard measure is necessary [...] to facilitate adjustment by the domestic industry to the increased competition from the increased imports."

300. MBIE concludes that a safeguard measure is not necessary to facilitate adjustments, because:

   (a) The domestic industry argues that it has made many adjustments without a safeguard measure in place – therefore a safeguard measure was not necessary for those adjustments to have been made.

[119] McKechnie Aluminium Solutions Ltd. (2025, July 23). *Submission on Gas DPP4 issues paper*. https://www.comcom.govt.nz/__data/assets/pdf_file/0038/367796/McKechnie-Aluminium-Submission-on-Gas-DPP4-Issues-paper-23-July-2025.pdf

(b) The domestic industry has provided no further credible evidence or plans of further adjustments that it would make.[120]

301. MBIE notes that the industry makes arguments for "longer-term structure to support this industry" being necessary and appeals to "level the playing field", which suggests it is considering, applying for other measures such as anti-dumping duties. MBIE notes that a safeguard measure is not necessary for the domestic industry to apply for an anti-dumping investigation.

[120] MBIE notes that the media has reported that there is around $270 million of planned investment on hold. Llewellyn, I. (2026, September 15). *Aluminium industry: Shifts cut, $270m investment freeze as import case drags*. *BusinessDesk*. https://businessdesk.co.nz/article/economy/aluminium-industry-shifts-cut-270m-investment-freeze-as-import-case-drags. MBIE has not received any submissions providing any further information on this figure.

7. Public interest considerations

7.1 What the public interest test entails

302. As part of the safeguard investigation MBIE must investigate the public interest, as it pertains to the imposition of a safeguard measure. The Act (at section 13(1)(e)) says that this public interest test "*may entail, among other matters, a consideration of the following*:

(i) the likely effectiveness of a safeguard measure in assisting the domestic industry:

(ii) the alternatives to a safeguard measure:

(iii) the likely effect of a safeguard measure on the market (including on consumers):

(iv) New Zealand's international relations and trade goals:

(v) the strategic importance of the domestic industry."

303. Using the information provided by domestic industry in submissions and during verification, each of these factors have been assessed to help MBIE form a view of the public interest in the imposition of a safeguard measure.

7.1.1 Likely effectiveness of a safeguard measure in assisting the domestic industry

304. As concluded in section 4, there are a variety of factors causing injury to the domestic injury, including the recent contraction in the domestic market. At section 6, MBIE concluded that a safeguard measure is not necessary to remedy serious injury.

305. However, to assess this factor as part of the public interest assessment, we have considered submissions from domestic manufacturers regarding what adjustments would be undertaken, should a safeguard measure be imposed. MBIE also considered the time that a safeguard measure can be imposed for, a maximum of four years, as provided for under section 20(5) of the Act (with the possibility of one extension).

306. ALENZ claims that $270 million of investment is currently on hold.[121] Domestic manufacturers submitted that a safeguard measure would provide relief from unfair import competition and increase industry confidence to invest in their businesses. For example, [redacted] submitted that safeguard relief would support it to undertake further capital investment, innovation, employment, and the roll out of lower-emissions technology.

307. [redacted] submitted that import competition had contributed to [redacted] capacity utilisation and they could supply a larger share of New Zealand demand.

Assessment on likely effectiveness of a safeguard measure in assisting the domestic industry

308. Submissions from the domestic industry could support an argument that a safeguard measure could enable it to increase production volumes and capacity utilisation to increase

[121] Llewellyn, I. (2026, September 15). *Aluminium industry: Shifts cut, $270m investment freeze as import case drags*. *BusinessDesk*. https://businessdesk.co.nz/article/economy/aluminium-industry-shifts-cut-270m-investment-freeze-as-import-case-drags

its collective market share relative to imports, particularly in the short term. It could offer some protection to the domestic industry from import competition until economic conditions improve, for example, when the construction sector rebounds (expected in 2030).[122]

309. However, MBIE does not have good evidence about the extent to which the safeguard period would support the industry over the medium to longer term when the safeguard measure is liberalised in accordance with the Act and having regard to the WTO Agreement on Safeguards. While the domestic industry has submitted that a safeguard measure could increase business confidence to progress deferred capital investment projects, as noted in section 6 of this report, MBIE has not been provided with adjustment plans, quantified forecasts, or documented evidence demonstrating the extent to which future investment activities are contingent on the imposition of a safeguard measure.

310. Accordingly, this factor does not support the imposition of a safeguard measure.

7.1.2 Alternatives to a safeguard measure

311. To assess this factor, MBIE looked at available alternatives to a safeguard measure that could address the circumstances which have given rise to the investigation. MBIE also considered the information provided in submissions and during verification, including allegations of:

- foreign government subsidies on imported goods
- Chinese manufacturers' excess capacity relative to domestic demand in China, and the resulting need for these manufacturers to seek new markets for this excess product, and
- import pricing alleged to be below commercially sustainable levels.

312. Where injury arises from allegedly dumped or subsidised imports, anti-dumping and countervailing duties may constitute alternative remedies, as these measures are specifically intended to address unfair trade practices. By contrast, safeguard measures are concerned with the effects of a sudden increase in imports regardless of whether those imports are fairly traded.

313. ALENZ raised examples of other jurisdictions, such as Australia, that have applied anti-dumping duties on aluminium extrusions. Submitters also referred to alternative measures outside of the trade remedies system. China Non-Ferrous Metals Industry Association submitted that productivity initiatives and measures supporting energy transition should be considered before resorting to trade restrictions.

Assessment on alternatives to a safeguard measure

314. MBIE considers that allegations relating to dumping or subsidisation are matters that could potentially be examined through the anti-dumping or countervailing duty frameworks set out in the *Trade (Anti-dumping and Countervailing Duties) Act 1988*. MBIE is open to any domestic industry applying for a dumping or subsidies investigation at any time if they see

[122] Ministry of Business, Innovation and Employment. (2025). *National construction pipeline report 2025: A forecast of building and construction activity* (13th ed.). Ministry of Business, Innovation and Employment. https://www.mbie.govt.nz/dmsdocument/31693-national-construction-pipeline-report-2025

merit in doing so. If these are matters that ALENZ wants to investigate, it would need to apply to initiate either a dumping or subsidies investigation.

315. While measures aimed at increasing productivity or efficiency may improve competitiveness, insufficient evidence was provided regarding the likely effectiveness of these measures at addressing the circumstances giving rise to this investigation – a perceived increase in imports resulting in injury to the domestic industry. MBIE notes that these measures would not directly affect import volumes or prices.

316. MBIE considers that there may be alternatives to the application of a safeguard measure but the information available is not sufficient to understand the effectiveness of these measures.

7.1.3 Likely effect of a safeguard measure on the market (including on consumers)

317. MBIE reviewed submissions and independently assessed how the imposition of a safeguard measure could affect producers, importers, upstream suppliers, downstream manufacturers and other users and final consumers. The assessment considered:

- prices and the pass-through of additional costs
- the possible effects on end users, including in the construction, marine and transport sectors
- domestic capacity and the practical substitutability of goods
- competition, consumer choice and commercial access to domestic products, and
- the impact on downstream manufacturing from imported finished goods.

Prices and pass-through

318. A number of importers, including [redacted] submitted that any imposition of a safeguard duty would ultimately pass through to end users and consumers. These submitters said they would pass on some or all of the safeguard measure to their customers, although noted that [redacted]. [redacted] speculated that the impact of the safeguard measure could reduce its volumes by 5 to 10 percent.

319. MBIE considers that at least some pass through is likely, but that the extent of pass-through is uncertain and would depend on the form and level of the measure, the proportion of imported goods in a firm's purchases, contractual arrangements, margins, competitive conditions and the availability of alternative supply.

320. Domestic producers submitted that competition among the five New Zealand extrusion businesses, together with continued competition from fairly traded imports, would constrain domestic pricin[redacted]ubmitted that imported prices were [redacted] per cent below its domestic pricing, indicating that imported goods currently provide a material price constraint in at least some transactions.

321. MBIE considers that a measure would increase the price of affected imports and reduce the price constraint those imports place on domestic goods competing in the market. MBIE therefore considers that downstream industries would see some increase in downstream prices.

Effects on end users

322. Domestic producers submit that aluminium extrusions are generally a small component of the installed cost of products such as windows, balustrades, vehicle bodies, and solar frames. On this basis, McKechnie considers that a modest increase in extrusion prices would have a significantly smaller effect on the price paid by the final consumer.

323. [redacted] an importer of aluminium extrusions, commissioned economic analysis from [redacted], an economic consultancy, to support its submission. [redacted] analysis, which MBIE has not independently verified, estimates that the effect of a safeguard measure on aluminium extrusions used on windows for an apartment, townhouse or unit could range from [redacted], depending on the tariff rate and assumptions used. [redacted] noted that for residential units consented in 2025, the estimated aggregate construction cost was between approximately [redacted]

324. MBIE considers that the price effect on an individual final product may be relatively small where aluminium extrusion represents a limited share of the total installed cost. The effect could nevertheless be more material:

- for extrusion-intensive products
- for projects containing a large number of repeated units
- for manufacturers and builders operating on low margins
- where prices have already been fixed
- where the relevant import has no practical domestic substitute, or
- when costs are aggregated across the construction sector.

325. MBIE does not have good information on the impact this would have on demand. ALENZ considers that consumption would remain broadly unchanged. [redacted] and [redacted], however, expect some demand reduction or switching to complementary goods, for example plastic, where customers are price sensitive. MBIE considers some demand response plausible, but the scale would depend on the extent of the measure and application.

Domestic capacity and substitutability

326. McKechnie outlines that the five domestic manufacturers operate nine presses, collectively covering almost the full spectrum of aluminium extrusion capability. [redacted] considers that there is sufficient domestic capacity to supply the entire New Zealand market.

327. Domestic producers also identify capabilities that are not captured by aggregate press capacity. ALENZ states that local producers supply small production runs, undertake frequent die changes, manufacture complex shapes and provide timely delivery.

328. These services can reduce downstream users' inventories, working-capital requirements and product-development times. MBIE considers that the retention of responsive domestic extrusion capability could therefore provide benefits to downstream manufacturers beyond the price of the extrusion itself.

329. Several downstream users contest the proposition that aggregate domestic capacity is equivalent to practical substitutability. [redacted] states that New Zealand suppliers have previously been unable or unwilling to supply certain punched, drilled or customised profiles. [redacted]

330. [redacted] all submitted that some profiles are too large or complex to be produced in New Zealand, either due to technical limitations or because it is uneconomic to do so.

331. MBIE considers that aggregate spare capacity does not demonstrate that every affected import can be replaced domestically. Practical substitutability depends on:

- press dimensions and capability
- alloy and temper
- profile complexity and dimensional tolerances
- finishing and fabrication requirements
- tooling availability and ownership
- minimum economic run size
- qualification and testing requirements
- lead time
- price, and
- the domestic producer's commercial willingness to supply the customer.

332. Imposition of a safeguard measure is more likely to result in domestic substitution for standard profiles that New Zealand producers already manufacture or can readily produce, particularly if prices are comparable given price sensitivity in the market. For large, complex, proprietary, or extrusions otherwise outside of what the domestic industry already produces, imposition of a safeguard measure may instead result in continued importing at a higher cost, delay, or reduced downstream production.

Competition, customer choice and commercial access

333. ALENZ submitted that competition would remain vigorous after imposition of a safeguard measure because the five extrusion businesses would continue to compete among themselves, and imports would remain in the market.

334. ALENZ members also consider that they compete through providing customers with material non-price benefits, including short production runs, just-in-time supply, lower inventory requirements, technical support and collaborative product development.

335. Submissions from downstream users and importers, particularly in the construction sector, present a different view of industry competition. [redacted] submitted that some supply occurs through proprietary networks, limiting independent manufacturers' access on equivalent terms. [redacted] reported being declined supply by a domestic extruder for reasons unrelated to capacity. [redacted] similarly stated that most locally extruded aluminium available to it is supplied by firms that also compete in the downstream door market, which it considers limits access to extrusion on commercially viable terms.

336. MBIE considers that the presence of physical production capacity does not, in itself, demonstrate that customers have effective commercial access to that capacity. Where a domestic extruder is vertically integrated into a downstream market or supplies through a proprietary network, a safeguard measure could strengthen the competitive position of the integrated system relative to independent manufacturers. This risk is more significant where imported extrusions are an independent manufacturer's principal alternative source.

337. In addition, as discussed above, the government also has a longstanding position to encourage competition within industries, including through imports. This is particularly

apparent in the building sector. As a recent example, the stated purpose of the Bu*ilding (Overseas Building Products, Standards, and Certification Schemes) Amendment Act 2025* (the Building Amendment Act) when it was a Bill in Parliament was:

> *"to respond to competition issues in the sector by amending the Building Act 2004 to remove barriers to overseas building products entering New Zealand's building product market and being used in New Zealand buildings."*

338. The increase in imports of building materials after the passing of the Building Amendment Act was clearly an intended policy outcome. Another example includes when the Government removed duties on plasterboard, reinforcing steel bar and wire nails and tariffs on building products like roofing, cladding, and electrical plumbing fittings in 2014.[123]

339. MBIE considers that imposition of a safeguard measure is unlikely to eliminate imported competition for aluminium extrusions, but it would reduce the price competitiveness of affected imports and could narrow supplier choice. The extent of this effect on the market, including the end consumer, would depend on the measure's coverage and whether users can source equivalent products either domestically or from overseas suppliers whose country is exempt from the imposition of a safeguard measure).

Downstream manufacturing and imported finished goods

340. A significant concern raised by downstream manufacturers and importers is that a measure applied to aluminium extrusions could increase costs for New Zealand manufacturers of products that use aluminium extrusions as a component part, while competing finished or semi-finished imports remain unaffected. Juralco considered this could encourage fabrication to move offshore and increase imports of finished products, while [redacted] and [redacted] submitted that higher input costs and reduced access to independent suppliers would weaken their competitiveness.

341. MBIE considers this argument to be credible. Where extrusions cannot be made domestically or cannot be supplied to an independent manufacturer on competitive terms, imposition of a safeguard measure may not transfer production to the domestic extrusion industry. Instead, it may:

- increase the New Zealand manufacturer's costs, which would likely be passed onto the end-user
- reduce investment or production
- increase imports of finished goods, or
- reduce New Zealand employment and value-added activity.

Assessment on likely effect of a safeguard measure on the market (including consumers)

342. The evidence indicates a trade-off between the supporting an adjustment by the domestic extrusion industry and the costs this would impose on importers, downstream manufacturers and end users, including consumers.

343. MBIE is satisfied a safeguard measure would increase the price of affected imports and place some upward pressure on downstream prices. While the effect on individual end users may be modest, effects could nevertheless be material in aggregate and for

[123] Penk, C. (2024, March 6). Duties and tariffs on building products removed. Beehive.govt.nz. https://www.beehive.govt.nz/release/duties-and-tariffs-building-products-removed

extrusion-intensive products, repeated-residential unit developments, low-margin firms and end-users without a practical domestic alternative.

344. There is also a risk that a safeguard measure covering imported extrusions, but not competing finished goods, could disadvantage New Zealand downstream manufacturers and encourage fabrication or other value-added activity to move offshore. Vertical integration and proprietary supply arrangements may further limit the extent to which domestic capacity provides an effective competitive alternative for independent manufacturers.

345. MBIE considers that the effect of a safeguard measure could vary materially by product and user segment:

- standard profiles with readily available domestic equivalents are more likely to transfer toward domestic supply, particularly if prices were relatively comparable.
- small-run custom profiles would continue to benefit from maintaining local technical capability and responsive production
- large, complex, highly fabricated or customer-specific profiles present a potential risk of cost increases, delays and ineffective domestic substitution, and
- profiles used by independent manufacturers competing with vertically integrated domestic extruders or imported finished goods present a risk of adverse competition and downstream-manufacturing effects.

346. Overall, a safeguard measure would likely provide benefits to upstream die makers, domestic extruders and some downstream users that depend on local capability but would also impose costs and supply risks on other downstream manufacturers and consumers. The balance of these effects would depend materially on the measure's rate, duration and product coverage

7.1.4 New Zealand's international relations and trade goals

347. The broader purpose of the Act is to enable New Zealand to apply temporary safeguard measures consistent with the WTO Agreements, both to protect a domestic industry from serious injury caused by increased imports and to facilitate adjustment to increased competition.

348. MBIE has considered publicly available sources to investigate New Zealand's international relations and trade goals. New Zealand has a strong interest in support open and predictable trade, the WTO, and the rules-based international trading system and maintaining strong bilateral and regional relationships for security and trade purposes. This is because New Zealand's economic prosperity, productivity and employment outcomes depend heavily on access to overseas markets for its exports.

349. Accordingly, New Zealand's commitment to open trade does not preclude the imposition of a safeguard measure but supports ensuring that any measure is rules-based, exceptional, temporary and appropriately calibrated to address any injury.

350. Recent ministerial statements have reaffirmed New Zealand's commitment to free and open trade, emphasising that the country's prosperity as a small, trade-dependent economy relies on a predictable, rules-based international trading system. These statements also highlight growing concerns about rising protectionism, expanding tariff

and non-tariff barriers, and a shift towards trade outcomes being determined by economic leverage rather than agreed international rules.[124]

[redacted]

352. The imposition of a safeguard measure on aluminium extrusions could also have implications for New Zealand's relationships with affected exporting economies and key trading partners. In considering New Zealand's international relations and trade goals, as they pertain to the imposition of a safeguard measure on aluminium extrusions, the following factors are relevant:

- [redacted]
- [redacted]
- whether imposition of a safeguard measure at the New Zealand border could contribute to normalisation of safeguard activity internationally, which would generally disadvantage small, export-oriented economies like New Zealand.

353. New Zealand's current exposure to safeguard action in major export markets gives consideration of New Zealand's international relations and trade goals particular significance. China, one of New Zealand's most important trading partners, imposed a three-year safeguard measure on beef from 1 January 2026.

354. Although New Zealand's country quota is sufficiently large that export volumes are unlikely to be constrained (based on recent export volumes over the last two years), the New Zealand Government described the measure as "unwelcome" and undertook sustained engagement to ensure that it recognised the strength of the bilateral relationship and minimised disruption under the China-New Zealand FTA.[125]

[redacted]

356. In July 2026, the United States also initiated a global safeguard investigation into fresh, chilled, or frozen lamb meat, which is ongoing. The United States is a high-value and important market for New Zealand lamb. The current United States investigation and

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[124] Luxon, C. (2025, April 10). *Speech on foreign affairs and trade*. Beehive.govt.nz. https://www.beehive.govt.nz/speech/speech-foreign-affairs-and-trade; McClay, T. (2026, May 13). *Speech to the New Zealand Institute of International Affairs: International trade in troubled times*. Beehive.govt.nz. https://www.beehive.govt.nz/speech/speech-new-zealand-institute-international-affairs-international-trade-troubled-times ; Peters, W. (2025, April 13). *Enduring Pacific partnerships*. Beehive.govt.nz. https://www.beehive.govt.nz/speech/enduring-pacific-partnerships

[125] McClay, T. (2026, January 1). China beef safeguards unlikely to restrict New Zealand exports. Beehive.govt.nz. https://www.beehive.govt.nz/release/china-beef-safeguards-unlikely-restrict-new-zealand-exports

recent safeguard action in China reinforces New Zealand's direct interest in conducting this safeguard investigation in accordance with domestic legislation and having appropriate regard to the WTO Agreements.

Consideration of proportionate compensation

357. MBIE notes that should the Minister decide to impose a safeguard measure on aluminium extrusions, the Minister should be aware of Article 8(1) of the WTO Agreement on Safeguards which provides:

> *"A Member proposing to apply a safeguard measure or seeking an extension of a safeguard measure shall endeavour to maintain a substantially equivalent level of concessions and other obligations to that existing under GATT 1994 between it and the exporting Members which would be affected by such a measure, in accordance with the provisions of paragraph 3 of Article 12. To achieve this objective, the Members concerned may agree on any adequate means of trade compensation for the adverse effects of the measure on their trade."*

358. WTO Members affected by any safeguard measure may reasonably expect that New Zealand would consider trade compensation options should the measure restrict imports from their country. This could include New Zealand offering something of equivalent value in return, such as removal of other trade barriers or quotas. Should the Minister determine that the threshold for imposition of a safeguard measure is met, and that a duty will be imposed, then further advice on possible compensation will be provided.

Assessment on New Zealand's international relations and trade goals

359. These concerns do not establish that a safeguard should not be imposed. A well-founded New Zealand measure could demonstrate the value of rules-based trade by showing that safeguards are available where the test is met.

360. New Zealand's current exposure to safeguard measures in key export markets strengthens the public interest case for restraint unless the substantive case is strong and the measure is tightly designed. In this investigation, the substantive case faces challenges as there is little causation evidence, and the domestic industry has not provided sufficient evidence that a safeguard measure will assist the industry to adjust to increased competition from imports. MBIE assesses New Zealand's international relations and trade goals as weighing moderately against imposing a safeguard measure in this instance.

7.1.5 The strategic importance of the domestic industry

361. To assess this factor, MBIE considered whether the domestic industry performs functions or provides capabilities that are of strategic importance to New Zealand. This assessment has included analysis of the domestic industry's role in New Zealand's supply chain security and resilience, the economic significance of the domestic industry to New Zealand, the regional importance of the domestic industry and employment and capability retention.

Supply chain security and resilience

362. Aluminium extrusions are used in;

- building and construction
- infrastructure projects
- transport equipment
- marine applications

- engineering products
- medical applications, and
- wider manufacturing.

363. The domestic industry submits that maintaining domestic extrusion capability reduces New Zealand's exposure to supply disruptions, of an important product used in many downstream applications. The COVID-19 period and subsequent shipping disruptions associated with overseas conflicts were repeatedly cited by submitters as demonstrating the value of local supply capability.

364. MBIE notes that the industry is an upstream supplier to multiple sectors of the New Zealand economy. However, the domestic industry is only one part of a large supply chain. Raw billet used to produce extrusions is sourced in part from New Zealand Aluminium Smelter but also substantially imported. This leaves the supply chain for aluminium extrusions vulnerable to supply chain disruptions notwithstanding the domestic sector.

365. MBIE assess that the domestic industry enhances New Zealand supply chain resilience to some degree by reducing dependence on offshore suppliers and providing rapid-response manufacturing capability during international disruptions.

366. Therefore, MBIE considers that the domestic industry contributes to a low to moderate degree to New Zealand's supply chain security and resilience for the downstream industries and users that rely on it.

Economic significance

367. ALENZ submits that the aluminium extrusion sector generates an estimated:

- $400 million in direct industry sales
- $100 million in upstream economic activity
- over $2 billion in downstream sales enabled by extrusion products.

368. ALENZ also estimates more than 1,000 direct jobs and approximately 6,000 upstream and downstream jobs are supported or enabled by the industry or broader industry. MBIE has not verified these figures.

369. McKechnie makes similar assertions; that the broader extrusion-enabled ecosystem supports more than 5,000 jobs and contributes approximately $6.3 billion in direct and downstream economic activity. MBIE has not verified these figures.

370. Publicly available information supports the proposition that extrusion is a significant value-adding stage in the aluminium supply chain. ALENZ describes extrusion as enabling local manufacture of building systems, transport products and marine products rather than simply supplying commodity aluminium.

371. The range of economic estimates and lack of independent verification suggests that economic estimates should be treated cautiously. However, available evidence and the known wide-ranging uses of aluminium extrusions suggest that the domestic industry acts as an enabling industry supporting substantially larger downstream economic activity.

372. The importance of the industry arises less from its direct output and more from its multiplier effects throughout the wider economy. MBIE's assessment is that the industry appears to contribute to significant economic activity in construction, manufacturing, transport, infrastructure and export-oriented sectors.

Regional importance, employment and capability retention

373. The domestic industry's production capacity is heavily concentrated in Waikato (Altus, INEX, Vulcan) and Taranaki (McKechnie). ALENZ submitted that more than 95 per cent of New Zealand aluminium extrusion production capacity is in those regions. Additionally, ALEXCO is based in Wellington.

374. ALENZ states that the Waikato aluminium extrusion industry is worth more than $1 billion annually and directly employs more than 400 workers. A 2020 ALENZ case study notes that Waikato extruders produce approximately 25,000 tonnes of aluminium extrusions annually and provide critical inputs to downstream industries.

375. In Taranaki, McKechnie is one of New Zealand's largest extrusion operations, operating in New Plymouth since 1947. McKechnie identify as a major regional employer, with more than 300 people primarily based at their New Plymouth site (but with offices in Auckland, Christchurch and Australia).

376. For both Waikato and Taranaki, the respective regional industry supports skilled manufacturing and engineering employment, contributes to retaining manufacturing capability within the region, supports other fabrication and manufacturing capability, and purchases inputs and services from local engineers, transport, and maintenance providers.

377. However, MBIE also notes that the domestic industry is not among New Zealand's largest regional employers and that the evidence does not suggest the regional economies concerned are uniquely dependent upon extrusion production.

378. MBIE notes that extrusion facilities involve substantial fixed capital investment and specialised manufacturing equipment. Submissions emphasise that extrusion capability encompasses specialised assets and skills including extrusion press operation, fabrication, anodising, powder coating, CNC machining, for example.

379. On balance, MBIE assess the aluminium extrusion industry as of moderate importance to the regions in which domestic producers typically operate, Waikato and Taranaki.

Assessment on strategic importance of the domestic industry

380. MBIE finds that the domestic aluminium extrusion industry possesses a moderate degree of strategic importance to New Zealand, performing a function and providing capability that is of strategic importance to the country. This importance derives from the concentration of production capacity in Waikato and Taranaki, the industry's role in sustaining skilled manufacturing employment and advanced industrial capability, and its contribution to supply chain security and resilience.

7.2 Summary of public interest

381. MBIE considers that the public interest factors weigh against imposing a safeguard measure.

382. A safeguard measure could assist the domestic manufacturing industry in the face of increased competition from imports in the short term by supporting investment confidence, improving utilisation of existing capacity, and helping preserve manufacturing capability.

383. However, these benefits must be weighed against the likely costs of a safeguard measure. A measure would likely increase costs for some importers, downstream manufacturers and consumers, particularly where affected products are not readily substitutable with

domestic supply. There is also a credible risk that higher input costs caused by a safeguard measure could disadvantage New Zealand manufacturers competing against imported finished goods and reduce value-added activity in some downstream sectors.

384. MBIE further notes New Zealand's strong interest in maintaining an open, rules-based and competitive trading system. While safeguard measures are a legitimate trade remedy, their imposition should be exceptional, temporary and carefully targeted. This consideration weighs against intervention where the benefits of a measure are uncertain or where the evidence supporting relief is not compelling.

385. Overall, while there are public interest considerations supporting the retention of domestic extrusion capability, MBIE considers that the likely costs and risks to downstream industries, consumers and New Zealand's wider trade interests outweigh the expected benefits. The public interest therefore weighs against the imposition of a safeguard measure.

8. Conclusion

386. MBIE has investigated the matters it is required to under section 13 of the Act and found that the statutory requirements for imposing a safeguard measure are not met.

387. MBIE found that imports of aluminium extrusions increased between 2015 and 2022. Since the peak in 2022, imports have remained relatively steady in absolute terms. The New Zealand market has declined since 2022, and MBIE found there has been a relative increase in imports compared to domestically produced goods, since then. MBIE also found that the domestic aluminium extrusion industry is experiencing serious injury. Output, sales, profitability, employment and capacity utilisation have declined.

388. However, MBIE found that increased imports have not, in and of themselves, caused serious injury. Imports declined in absolute terms over the investigation period, while the New Zealand market contracted by about 30 per cent. Reduced exports, rising costs, lower efficiency, and domestic competition also contributed materially to the injury suffered by the domestic industry.

389. MBIE concludes that while there were several unforeseen developments over the investigation period, increased imports were not due to those unforeseen developments. The evidence also does not establish that a safeguard is necessary to address the injury suffered by the domestic industry. In addition, the industry has not provided sufficient detail on how it would use any temporary protection afforded by a safeguard measure to adjust to the increase in imports once the safeguard measure ends.

390. The public interest also weighs against intervention. A safeguard measure could provide relief from some competitive pressure in the short-term, and that domestic industry supports domestic manufacturing capability that contributes to regional employment. However, notwithstanding that the threshold in the Act has not been met, it is not clear that applying a safeguard would contribute to the industry's competitiveness over the medium term. Alongside this, a safeguard measure could raise costs for some importers, downstream manufacturers, including those competing with ALENZ members, and consumers. [redacted]

Appendix 1 – List of acronyms and key terms

Acronym/key term	Meaning
ALENZ	Aluminium Extruders Association of New Zealand
ALEXCO	Aluminium Extrusion Company Limited
Altus	Altus NZ Limited
AS/NZS	Australian/New Zealand Standard
ASX	Australian Securities Exchange
CBAM	Carbon Border Adjustment Mechanism
China	People's Republic of China
CPI	Consumer Price Index
CSTRQ	Country Specific Tariff Rate Quota
Customs	New Zealand Customs Service
EBIT	Earnings Before Interest and Tax
EBITDA	Earnings Before Interest, Tax, and Depreciation
EU	European Union
FTA	Free Trade Agreement
GATT 1994	General Agreement on Tariffs and Trade
GDP	Gross Domestic Product
HS	Harmonised System
INEX	Independent Extrusions Limited
kg	kilogram
MBIE	Ministry of Business, Innovation and Employment
McKechnie	McKechnie Aluminium Solutions Limited
MFAT	Ministry of Foreign Affairs and Trade
MFN	Most Favoured Nation
MJP	Main Japanese Ports Premium
NZX	New Zealand Exchange
NZ$	New Zealand Dollar
PACER Plus	Pacific Agreement on Closer Economic Relations Plus
ROI	Return on Investment
VAT	Value Added Tax
Vulcan	Vulcan Ullrich Aluminium NZ Limited
WTO	World Trade Organization

Appendix 2 – List of interested persons

The full of list of parties that provided information to the investigation or registered as interested parties is below;

Name	**Government**	**Producer / Manufacturer**	**Exporter**	**Importer**	**Supplier / Distributor/Wholesaler**	**End user/ downstream industry**	**Other**
China Nonferrous Metals Industry Association							Industry Association
PT Indal Aluminium Industry							
Foshan Xingtaomei Aluminum Industry Co							
GuangDong YongLiJian Aluminum Co. Ltd							
Guangdong Jihua Aluminium Co. Ltd.							
Guangdong Luoxiang Aluminium Co.Ltd.							
Bazhou Herong International Trade Co. Ltd.							
Tianjin Alcoa International Trade Co., Ltd							
Langfang Guomei Aluminium Industry Co., Ltd							
Guangdong HuaChang Group Co., Ltd							
Press Metal International Ltd.							
Guang Ya Aluminium Industries Co.Ltd.							

Name	**Government**	**Producer / Manufacturer**	**Exporter**	**Importer**	**Supplier / Distributor/Wholesaler**	**End user/ downstream industry**	**Other**
Shandong Orient Aluminium Co.Ltd.		■					
Foshan City Nanhai Yongfeng Aluminium Co.Ltd		■					
Foshan Davos Aluminium Extrusions Co., Ltd		■					
Foshsan Sanshui Fenglu Aluminium Co. Ltd.		■	■				
PT Calindo DSA			■				
Monkey Toe Group		■					
Ali Arc Industries							None specified
Reloc8 NE Limited						■	
Extec Limited		■	■		■		
Fortis Windows and Doors Limited		■			■		
Omega Canterbury Limited		■					
Central Glass and Aluminium						■	
Nu-Wall Aluminium Cladding		■					
SD Aluminium Limited				■	■	■	
Metropolitan Glass and Glazing Limited		■					
Rapid Hardware Group				■			
R&B Aluminium Limited				■	■		

Name	**Government**	**Producer / Manufacturer**	**Exporter**	**Importer**	**Supplier / Distributor/Wholesaler**	**End user/ downstream industry**	**Other**
Weathershield Windows and Doors							
Parkwood							
Paynes Aluminium							
Thermosash Commercial							
UNO Windows and Doors							
Juralco Aluminium Building Products Limited							
EasyGate Ltd.							
APL Windows Solutions							
Starke Group							
Window and Glass Association of New Zealand							Trade Industry Association
Metals NZ							Trade Industry Association
The EU							
Government of the People's Republic of China							
Government of Indonesia							
Government of India							
Government of Taipei							

Name	**Government**	**Producer / Manufacturer**	**Exporter**	**Importer**	**Supplier / Distributor/Wholesaler**	**End user/ downstream industry**	**Other**
Government of Malaysia	[redacted]						
Government of Viet Nam							
Government of the United Kingdom							
Government of Mexico							

Appendix 3 – Additional analysis and findings related to goods

Further analysis on imported goods

In their questionnaire responses, importers, exporters, and foreign manufacturers define the exported or imported goods as having the following general characteristics;

- Product type: Hollow, solid and complex extrusions, custom
- Product thickness: thickness of up to 4mm, light to heavy or structural wall thickness
- Product shape[126]: Hollow, channel, track, trim and flat bar shapes plus custom shapes
- Applicable standard: Goods that fall within AS/NZS Standard Code(s) 1866 and 1997 or equivalent for the primary product
- Finish: Mill, mechanical, Anodised ≤ 20 µm, painted or coated
- Product temper code: T5 &T6, and
- Post-manufacture fabrication: precision cutting, punching, cutting, drilling, notching, bending, assembly parts, end deburring, hole drilling and punching, CNC milling and end machining, and a small amount of non-structural welding for local assembly connection. No deep forming, electroplating, full assembly or other complex finished-product processing is carried out.

Further analysis of like goods and directly competitive goods

From the submissions provided by the domestic industry MBIE has identified the following characteristics of aluminium extrusions;

- Product types: Hollow, solid or complex types, custom
- Product thickness (wall or section): thickness of up to 4mm. Light industrial use to heavy industrial use.
- Product shapes[127]: including but not limited to, angles, channels, flats, half rounds, hollow squares/rectangles, I beams, rounds, squares, hexagons, tees, extruded tubes, zeds and top hats. This description also includes aluminium extrusions that are made to custom specifications per a customer's request.
- Applicable standard: Goods that fall within AS/NZS Standard Code(s) 1866 and 1997 or equivalent for the primary product.
- Product alloy series 6000, specifically alloy codes 6005, 6005A, 6060, 6063, 6061, 6101, 6106, 6261, 6463.
- Product alloy series 1000, specifically alloy code 1200.
- Product temper code: 0 temper, T1, T4, T5, T6, T52, T526, T591
- Product finish: mill, mechanical, painted or coated not anodised and those anodised up to ≤ 20 µm

[126] Angles, channels, flats, half rounds, hollow squares/rectangles, I beams, rounds, squares, hexagons, tees, extruded tubes, zeds, top hats - 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 / moulding / nosing / cladding / decorative (DEC); trim / slat / moulding / nosing / cladding / decorative (DEC).

[127]. 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 / Moulding / Nosing / Cladding / Decorative (DEC); Trim / Slat / Moulding / Nosing / Cladding / Decorative (DEC).

- Fabrication: precision cut, punching, drilling, CNC machining, CNC bending, welding, zipping, polishing, knurling, rumbling/deburring, cropped, cut to length.

The products made by the domestic industry are in standard lengths, mainly used in the construction, marine, and transport sectors. They are sold through retail stores and trade warehouses as well as online.

The largest sector for aluminium extrusions is for window and door joinery applications, which are mainly produced using the 6060 alloy. Other product uses include transport, the marine sector, sporting goods, electricity infrastructure, storage units, sun control systems, cladding, partitioning, cable trunking, internal items such as wardrobe doors and cabinetry, lighting and other.

Findings from verification related to like goods

The goods produced by the domestic industry (like goods) are best reflected by the supplementary description provided by ALENZ on 28 August 2026 rather than the description provided in the application which referrers to mill-finish goods only.

This supplementary description 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), mechanical, anodised or painted or otherwise coated, whether or not worked...*
>
> *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, drilled or a thermal break inserted) 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.*

Goods produced by [redacted] are outlined in the table below;

Feature	Like goods	Exclusions
Type or shape	Geometric/industrial and complex extrusions - Hollow, solid, custom or bespoke shapes.	Goods produced for use in the domestic producers' windows and doors businesses. These goods are produced under intellectual property protection.
Thickness	Thickness of up to 420mm and weighing below 23kg per m^2. Light to heavy or structural wall thickness	Thickness beyond 420mm and weighing above 23kg per m^2
Surface finish	Mill, mechanical, anodised, painted or otherwise coated	None
Fabrication	Precision cutting, punching, cutting, drilling, notching, bending, assembly parts, end deburring, hole drilling and punching, CNC milling and end machining, and a small amount of non-structural welding for local assembly connection. No deep forming, electroplating, full assembly or other complex finished-product processing is carried out.	Windows and doors. Thermal breaks inserted.
Alloys	6000 series	1000 series - produced by the domestic industry but the goods are functionally different from the good produced by the 6000 series aluminium 2, 3, 5, 6 or 7series – the domestic producers do not manufacture goods using these alloys. Goods made from these alloys are not functionally close substitutes to the goods produced using the 6series alloy.

Table 50 – Goods produced by [redacted] and specific exclusions from the investigation

Like goods analysis

Factor	MBIE's overall comments
Method of manufacture	The goods produced by the domestic industry and imported goods are manufactured using a similar process involving the extrusion of a heated aluminium billet through a die. In both cases the similar raw material and productions processes are used i.e. aluminium billet of various specification within the 6 series alloy and an extrusion process.

Physical characteristics	MBIE considers that the products produced in New Zealand carry similar physical characteristic and are close substitutes to the imported goods. Both product categories are generally made from the same alloy series, have similar finishes and are manufactured within the same range of thickness and shape. The products also generally fall within the same AS/NZS Standard Code(s). MBIE notes that some of the exporters specialise in producing extrusions with a thickness of less than 2mm and some with shorter lengths that are precisions cut. It also notes that domestic producers have the capacity to produces to customer specifications.
Function and usage of the products	In both cases the goods are identical or close substitutes and are used for the same functions by the consumers or they are close substitutes used interchangeably and have comparable applications.
Pricing structures and the level of trade	Pricing of these goods is based on the cost of billet and factors reflecting other costs of production. From the information provided by domestic and foreign manufacturers, MBIE considers that the pricing for these products is set using similar formulations. There is direct competition between the goods produced by the domestic producers with the imported goods. These goods are also sold at the same level of trade within the New Zealand market and to customers who also purchase imported goods through domestic distributors or directly from overseas manufacturers.
Marketing and distribution channels	Domestic manufacturers and foreign manufacturers/exporters market and distribute their goods via the same channels such as New Zealand retailers, and other distributors of the imported goods or online selling platforms. Customers are able to equally choose between domestic and imported products as they are equally accessible via similar channels.

Table 51 – Analysis of like goods

Appendix 4 – Technical notes on exemptions to safeguard measure

This appendix details the specific commitments that New Zealand has made across its international agreements in relation to the exemption of safeguard measures or other additional commitments.

Trade Agreements

Table 52 below illustrates the specific commitments that New Zealand has made to other economies in addition to the WTO Agreement on Safeguards:

Relevant economies	Agreement	Commitment
Australia	New Zealand – Australia Closer Economic Relations[128]	Prohibition on the imposition of tariffs, quantitative import restrictions and tariff quotas to Australian goods
Singapore	New Zealand Singapore Closer Economic Partnership Agreement [129]	Prohibition on initiating or taking any safeguard measure against goods from Singapore
Hong Kong	New Zealand – Hong Kong, China Closer Economic Partnership[130]	Obligation to exclude imports of goods from safeguard measures if the imports do not in and of themselves cause or threaten to cause serious injury
Chinese Taipei	Agreement between New Zealand and the Separate Customs Territory of Taiwan, Penghu, Kinmen and Matsu on Economic Cooperation[131]	
China	New Zealand – China Free Trade Agreement[132]	Discretion to exclude imports of goods from safeguard measures if they do not in and of

[128] New Zealand Ministry of Foreign Affairs and Trade. *NZ-Australia Closer Economic Relations (CER)*. https://www.mfat.govt.nz/en/trade/free-trade-agreements/free-trade-agreements-in-force/nz-australia-closer-economic-relations-cer

[129] New Zealand Ministry of Foreign Affairs and Trade. *NZ-Singapore closer economic partnership*. https://www.mfat.govt.nz/en/trade/free-trade-agreements/free-trade-agreements-in-force/nz-singapore-closer-economic-partnership

[130] New Zealand Ministry of Foreign Affairs and Trade. *NZ-Hong Kong, China closer economic partnership*. https://www.mfat.govt.nz/en/trade/free-trade-agreements/free-trade-agreements-in-force/nz-hong-kong-china-closer-economic-partnership

[131] New Zealand Commerce and Industry Office. *About ANZTEC*. https://www.nzcio.com/en/anztec/about-anztec

[132] New Zealand Ministry of Foreign Affairs and Trade. *NZ-China free trade agreement*. https://www.mfat.govt.nz/en/trade/free-trade-agreements/free-trade-agreements-in-force/nz-china-free-trade-agreement

South Korea	Korea – New Zealand Free Trade Agreement[133]	themselves cause or threaten to cause injury.
Malaysia	Malaysia – New Zealand Free Trade Agreement[134]	
Thailand	New Zealand – Thailand Closer Economic Partnership[135]	
United Arab Emirates	New Zealand – United Arab Emirates Free Trade Agreement[136]	
Pacific Island countries[137]	PACER Plus[138]	Requirement to provide the equivalent treatment to low volume goods from both WTO members and non-WTO members.
EU	New Zealand – EU Free Trade[139]	Obligation to endeavour to impose global safeguard measures in a way that least affects trade between Parties.

Table 52 – Commitments New Zealand has made to other economies in addition to the WTO Agreement on Safeguards

WTO Agreement on Safeguards

Article 9 of the WTO Agreement on Safeguards provides that safeguard measures cannot be applied against goods from developing Members as long as the share of imports from each developing Member is less than three percent, provided that imports from developing Members with less than three percent share collectively account for not more than nine percent of the total imports. WTO Member states self-report as developing or developed.

[133] New Zealand Ministry of Foreign Affairs and Trade. *Korea-New Zealand Free Trade Agreement* https://www.mfat.govt.nz/en/trade/free-trade-agreements/free-trade-agreements-in-force/korea-new-zealand-free-trade-agreement

[134] New Zealand Ministry of Foreign Affairs and Trade. *NZ-Malaysia free trade agreement*. https://www.mfat.govt.nz/en/trade/free-trade-agreements/free-trade-agreements-in-force/nz-malaysia-free-trade-agreement

[135] New Zealand Ministry of Foreign Affairs and Trade. *NZ-Thailand closer economic partnership*. https://www.mfat.govt.nz/en/trade/free-trade-agreements/free-trade-agreements-in-force/nz-thailand-closer-economic-partnership

[136] New Zealand Ministry of Foreign Affairs and Trade. *New Zealand–United Arab Emirates free trade agreement*. https://www.mfat.govt.nz/en/trade/free-trade-agreements/free-trade-agreements-in-force/new-zealand-united-arab-emirates-free-trade-agreement

[137] Including the Cook Islands, Australia, Kiribati, Niue, Samoa, Solomon Islands, Tonga, Tuvalu, Vanuatu

[138] New Zealand Ministry of Foreign Affairs and Trade. *Pacific Agreement on Closer Economic Relations (PACER) Plus* https://www.mfat.govt.nz/en/trade/free-trade-agreements/free-trade-agreements-in-force/pacer-plus

[139] New Zealand Ministry of Foreign Affairs and Trade. *New Zealand-European Union Free Trade Agreement* https://www.mfat.govt.nz/en/trade/free-trade-agreements/free-trade-agreements-in-force/new-zealand-european-union-free-trade-agreement

MBIE has assessed trade volumes in 2025 and determined that the following economies would be exempt from any measures under these provisions of the Agreement. These economies have traded non-zero volumes, but meet the exemption criteria above:

- Malaysia
- Chinese Taipei
- Vietnam
- Sri Lanka
- Türkiye
- India
- Fiji
- Ecuador
- South Africa

Appendix 5 – Method used to identify relevant aluminium extrusion imports

The Customs import dataset covering the most recent ten-year period was extracted and used as the primary source of import transaction information for this investigation.

Import records falling within the two relevant Harmonised System (HS) codes were extracted from the broader Customs dataset. A further filtering exercise was then undertaken using the free-text product descriptions recorded within the Customs data.

To support consistent classification of products, a set of inclusion and exclusion criteria was developed to define the scope of goods relevant to the investigation. These criteria were translated into a structured prompt and applied using Microsoft Copilot to assist with the initial sorting and categorisation of import records. The AI-assisted review produced an initial dataset, but further human classification was required for product descriptions the AI-assisted review could not classify. Human classification was required for more than 2000 lines of Customs data. Human review was undertaken to review the accuracy of the lines classified by Microsoft Copilot.

Products were generally treated as being within scope where the available information indicated that they were likely to be aluminium extrusions. In applying this assessment:

- Goods were assumed to be aluminium products, as they were imported under one of two aluminium tariff lines, unless there was evidence to the contrary.
- Product descriptions referring to extruded profiles, sections, bars or similar terminology were treated as an indicator that the goods may fall within scope.
- Goods in scope included relevant aluminium alloys (1200, 6005, 6005A, 6060, 6061, 6063, 6101, 6106, 6261) and extrusion tempers (F, FT, O, T1, T4, T5, T52, T526, T591, T6) only.
- Records that appeared to describe unfinished or semi-finished extruded products were generally retained for further review.

The following categories of goods were generally treated as outside the scope of the investigation and excluded from further consideration:

- products explicitly identified as being manufactured from non-aluminium materials
- finished goods and complete assemblies.
- complete or partial window, door, or other fenestration systems
- glazing beads, mullions, and louvre parts.

Application of the HS code filtering, free-text searches and inclusion/exclusion criteria produced an initial population consisting of several thousand import records for detailed review.

A manual review was then undertaken to assess individual records. Where the available product description indicated that a product was probably an aluminium extrusion, the record was retained within the dataset. Where required, further research on particular items was undertaken to determine if the items were in scope of the investigation. Where insufficient information was available to determine whether a product was an aluminium extrusion, the record was excluded. This approach was adopted to minimise the risk of including products that could not be reasonably identified as being within the scope of the investigation.

Appendix 6 – Sensitivity Analysis for import data

Appendix 5 above outlines that where insufficient information was available to determine whether a consignment was an aluminium extrusion, the record was excluded. The sensitivity analysis tests the effect of changing that assumption – from assuming those consignments (those unable to be determined as an aluminium extrusion) are out of scope, to assuming they are in scope.

Uncertain lines make up a small portion of the total trade across the relevant tariff lines

Across data from 1 January 2015 to 31 July 2026, 1,686,070 kgs of goods (or 2.54 per cent of the goods deemed in scope) with a value of $15,673,997 (or 3.72 per cent of goods deemed in scope) were unable to be determined as in scope of the investigation.

Figure 16 below illustrates the profile of this trade since 2015. The figure demonstrates the small additional volume of goods that could have been subject to this investigation but has not been considered in the investigation. Figure 16 shows, through the red shading, that the additional uncertain volume is low, and not material to the findings of the investigation. Having conducted this sensitivity analysis, MBIE considers that the import analysis is robust.

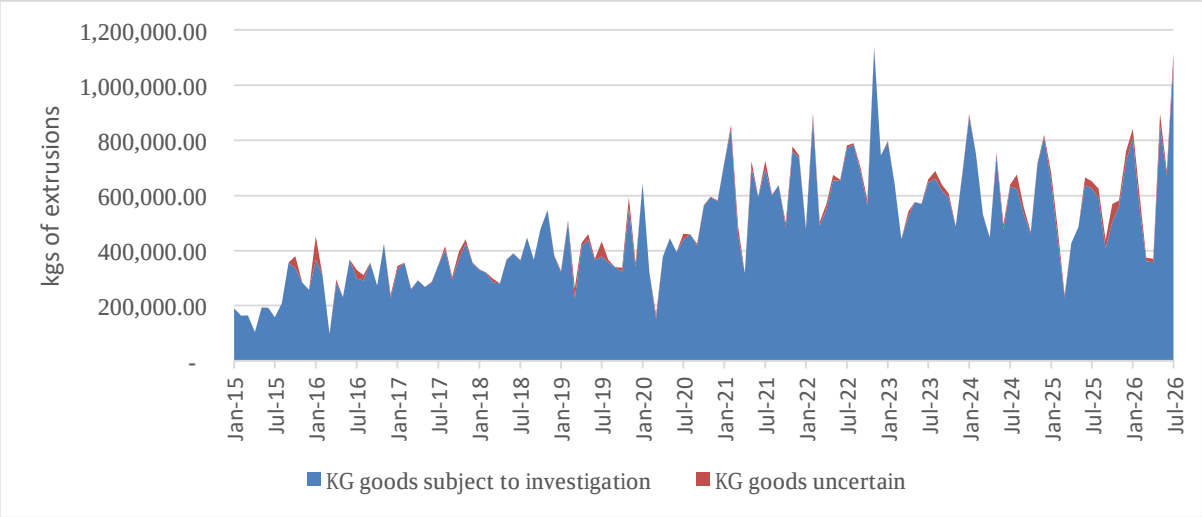

Figure 16 – Total volume of goods in scope, and unable to be determined as in scope of the investigation[140]

[140] Confidential trade data obtained from the New Zealand Customs Service showing imports against tariff items 76 04 21 00 00B and 76 04 29 09 00F.

Appendix 7 – Injury data and verification process

Purpose

This appendix outlines the information relied upon in assessing injury, and the approach taken to verify that information. It should be read alongside the discussion of data limitations contained in section 4 of this report.

Overview of information provided

Detailed injury information was provided primarily by Altus, INEX, and McKechnie during the investigation.

This information was received through multiple stages of the investigation, including:

- information contained in the application submitted by ALENZ
- responses to the domestic manufacturers' questionnaire received in June 2026, and
- additional information and supporting documentation provided during verification and in subsequent submissions in response to verification questions made during August and September 2026.

That injury data supported MBIE's investigation on output, sales volumes, sales revenue, market share, profitability, productivity, employment, production capacity utilisation, costs, pricing, and other factors relevant to the injury assessment.

ALEXCO has provided some information and data to the investigation as well. Vulcan provided rounded production figures in support of the application.

Approach to verification

MBIE undertook verification as to the reliability of the data provided by ALENZ and individual businesses.

The purpose of verification was to assess whether the information provided by participating domestic producers:

- related to the injury factors under investigation
- was internally consistent
- was supported by underlying business records and source documentation where possible, and
- was reasonable for the purposes of, and time allowed for, the investigation.

Verification was not conducted as a financial audit and did not involve a full reconciliation of reported information to audited financial statements.

MBIE undertook the following verification activities:

- review of questionnaire responses, submissions, spreadsheets, and supporting documents provided by participants;
- an online verification workshop with the producers collectively;
- site visits to domestic manufacturers to discuss methodology, assumptions, and source data;
- examination of underlying data where possible; and
- follow-up questions and requests for clarification where inconsistencies or gaps were identified.
- an assessment, to the extent possible, of whether the information provided related to the injury factors under investigation, was internally consistent, was supported by underlying data, and was reasonable for the purposes of the investigation.

Producers made refinements to the data provided over the course of the investigation

On 10 June 2026, MBIE requested, via the domestic manufacturer's questionnaire, producers provide injury data relating to the full scope of the domestic industry. The questionnaire described the subject goods included in this investigation as including "aluminium extrusion products that have been further processed or fabricated to a limited extent, after aluminium has been extruded through a die."

Verification site visits undertaken by MBIE in August 2026 identified that injury data provided by producers to date had generally related to only mill-finish extrusions and did not relate to additional finishing processes.

Because the goods within scope of the investigation also included goods subject to finishing processes, injury data relating to only mill-finished goods was insufficient to consider the full scope of the industry under investigation. Accordingly, following on-site verification visits in August, MBIE requested that producers provide injury data on extrusions that had been subject to further processing to ensure the full scope of the relevant goods was considered.

This information was provided by producers in September 2026.

The September information included changes to original data provided by producers due to adjusted calculation methodologies used by producers. This means there were some inconsistencies in the tranches of data provided by producers across the full investigation period.

Given the September data was provided at a late stage in the investigation, MBIE's ability to verify this data was limited.

Approach to use of injury data

Injury information was received by MBIE at several stages of the investigation, with some data changing due to refinement of calculation methodologies used by producers.

Where data was inconsistent across different tranches of information, MBIE relied on the most recent data provided, as this data reflected changes made by producers to calculation methodologies and the separation of mill-finish, further finished, and total production data. Earlier information was relied upon where updated information was unavailable for a relevant measure.

Where information was based on estimates, allocations, assumptions, or methodologies developed by participating producers, MBIE assessed the reasonableness of those approaches during verification. Data limitations are outlined in the injury data limitations section, with further detail on limitations for particular data included in footnotes.

Appendix 8 – Source for domestic production data and total New Zealand market data

Domestic production data is obtained from data provided by the domestic industry:

- [redacted]

Total NZ market data is obtained from:

- Domestic production data; and
- Import data. Obtained from New Zealand Customs Service. (2026). Confidential trade data showing imports against tariff items 76042100 00B and 76042909 00F. Unpublished.

Exports by the domestic industry is obtained from:

- ALENZ. ALENZ Appendix 9 _Summary of exports by the domestic industry. Public file 001i. Provided in January 2026. This data does not account for exports, if any, by [redacted]

Appendix 9 – Legal framework for unforeseen developments

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