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## For Public File

### Investigation 362 Certain Aluminium Extrusions from Malaysia and Vietnam

#### Press Metal Aluminium (Australia) Pty Ltd (PMAA) & Press Metal Berhad (PMB)

I represent Press Metal group—PMAA the importer and PMB the exporter

The timetable so far:

		<b>Due Dates</b>	
		<b>SEF placed on public record</b>	<b>Recommendation to Parliamentary Secretary</b>
16 August 2016	Initiation	5 December 2016	18 January 2017
17 October 2016	PAD ADN 2016/108		
19 October 2016	IDD securities start PMB 13.2% <b>preliminary</b> dumping margin		
30 November 2016	<b>First</b> extensions notification ADN 2016/126	2 February 2017	20 March 2017
13 December 2016	PMB <i>Exporter Visit</i> <b>negative</b> 3.3% dumping margin report placed on public record		
2 February 2017	<b>Second</b> extensions notification ADN 2017/14	20 March 2017	3 May 2017

For the following reasons Press Metal group requests that the ADC recommend the Commonwealth from today cease taking Customs Act Section 42 securities on its GUC shipments and cancel all existing securities

**1 Press Metal group zero (negative) dumping margin and zero countervailing subsidy**

The November 2016 PMB exporter visit verification report, without qualification, set **negative** 3.3% dumping margin and zero countervailing subsidy—hence removing the need for securities

No one has presented evidence impacting on these ADC determinations

**2 SEF and *Recommendation to Parliamentary Secretary* already twice extended**

This has resulted in:

- 3½ months aggregate extensions from initiation scheduled dates
- only 3 months securities collected to 18 January 2017 *Recommendation to Parliamentary Secretary* date initiation schedule if securities ceased then
- 3½ months securities collected to today
- 6½ months securities (net of s 45 cancellations) collected if continued to currently scheduled 3 May 2017 *Recommendation to Parliamentary Secretary* date

More than enough time has passed for ADC to issue the SEF and *Recommendation to the Parliamentary Secretary*

**3 Substantial market and financial risk of Press Metal group**

**a Financial risk in the volume of securities**

Since the initiation, PMAA has continued its imports as normal and to date has put up around \$ [REDACTED] in securities without passing on to its customers any price increases reflecting this secured IDD

In doing this PMAA has undertaken an extreme financial risk that the Commonwealth will never liquidate these securities—based solely on the outcome of the non-binding PMB exporter verification report setting negative dumping margin

**b Market effect**

Even though PMAA has purposely avoided passing on to its customers any effect of the IDD subject to the securities, its customers have remained sensitive to and out of caution have limited their orders from PMAA—starting from the initiation of the investigation and the PAD **preliminary** 13.2% IDD. This has resulted in substantial and long term detriment to PMAA's Australian business

**4 Commonwealth not stopped from ceasing taking securities**

Nothing in the law stops the Commonwealth from ceasing to take any further securities

**5 Until today, since the PMB exporter and PMAA importer verification, Press Metal group have purposely withheld making submissions to the ADC—leaving the ADC free to complete its other investigations and the SEF**

To assist the ADC in promptly resolving this investigation and to speed up the SEF and ADC *Recommendation to the Parliamentary Secretary*, PMAA has gone out of its way to avoid making any submissions in response to others—which would consume valuable ADC resources and time to investigate, consider and to respond to for the SEF—even though others have questioned the PMB exporter and PMAA importer verification outcomes

**6 Sufficient grounds exist for the ADC to immediately recommend to terminate this investigation in respect of Press Metal group**

**Negative 3.3%** dumping margin and zero countervailing subsidy following comprehensive exporter verification visit and unqualified reports, in addition to confirming PMAA importer verification



Geoffrey Cantelo



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