Percival Legal

Non-Confidential

30 May 2025

By Email

Director - Investigations,
Anti-Dumping Commission
Canberra ACT 2601

Dear Sir/Madam,

RE: Revocation Review 667 – anti-dumping measures applying to exports of aluminium extrusions products from Malaysia by PMBA – Submission – Absence of Dumping

I refer to the abovementioned Revocation Review 667 concerning whether the anti-dumping measures applying to exports by PMB Aluminium Sdn. Bhd (**PMBA**) are no longer warranted.

In its application for the revocation review, Press Metal Aluminium (Australia) Pty Limited (**PMAA**) provided information and evidence that PMBA's exports of the subject aluminium extrusion products during 2024 and first quarter 2025 were not being dumped.

To reiterate that fact, at **Confidential Attachment A** is a comparison of PMBA's pricing each month during the abovementioned period. It compares PMBA's prices to PMAA with PMBA's prices to PMBA's related entities/divisions in Malaysia using the same methodology as used by the Commission and endorsed by the Anti-Dumping Review Panel and, of course, is at the same level of trade. That information discloses that in each month, PMBA's prices to PMAA (i.e., export prices) were greater than the comparable domestic prices of PMBA to its related entities/divisions except in one month.

The exception in one month is attributable to an unfavourable fall in exchange rates, not a change in the pricing itself. That is, changes in PMBA's pricing during this period are attributable to factors outside of PMBA's control, such as LME aluminium prices, and not due to a change in the 'spread'.

It is to be noted that the comparison period is longer than the 12-month period used in investigations, reviews and inquiries. Further, when coupled with the prior periods referred to in PMAA's application for this review in which PMBA's exports have been determined to be dumped, discloses an extensive, continuous period in which PMBA's exports have not been at dumped prices.

This is consistent with PMBA's and PMAA's position that not only have PMBA's exports not been dumped, but also that PMBA can export at un-dumped prices and its exports continue to be competitive and profitable in the Australian market. Of course, there is the additional factor that the Australian industry, as represented by Capral, has not incurred injury from any source since at least 2019, let alone from PMBA's exports.

Please note that the information in **Confidential Attachment A** is based on information and evidence submitted to the Commission in this review. Accordingly, that information can be readily verified as being complete and accurate consistent with information submitted in previous reviews and inquiries.

If you have any questions, please contact me.

Yours faithfully,

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Confidential Attachment A
'Pricing' – PMAA vs Related Entities/Divisions

Months	Average Monthly Exchange rate MYR-AUD	Related Entities/Divisions Average Price MYR	PMAA Average Price MYR	Percentage Difference	PMAA Average Price AUD
Jan-24	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Feb-24	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Mar -24	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Apr – 24	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
May -24	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Jun- 24	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Jul -24	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Aug-24	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Sep-24	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Oct-24	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Nov-24	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Dec-24	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Jan-25	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

Feb-25	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Mar-25	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

[Confidential pricing information redacted]