



Australian Government
Department of Industry,
Science and Resources

OFFICIAL: PUBLIC RECORD

Anti-Dumping Commission

Australian Industry Questionnaire

Case number: 696

Product: Certain concrete underlay film

From: Malaysia

Review period: 1 January 2025 to 31 December 2025 (the period)

Response due by: 23 February 2026

Email enquiries to: investigations3@adcommission.gov.au

Anti-Dumping Commission website: www.adcommission.gov.au

Responses to the exporter questionnaire must be submitted via SIGBOX. Please contact the commission on the above email address to request access to SIGBOX.

OFFICIAL: PUBLIC RECORD

TABLE OF CONTENTS

TABLE OF CONTENTS	2
INSTRUCTIONS	3
CHECKLIST	6
GOODS UNDER CONSIDERATION / GOODS SUBJECT TO ANTI-DUMPING MEASURES	7
SECTION A COMPANY INFORMATION	8
A-1 COMPANY REPRESENTATIVE AND LOCATION	8
A-2 COMPANY INFORMATION	8
A-3 GENERAL ACCOUNTING INFORMATION	9
A-4 FINANCIAL DOCUMENTS	9
SECTION B AUSTRALIAN SALES	11
B-1 AUSTRALIAN SALES PROCESS	11
B-2 AUSTRALIAN SALES LISTING	13
B-3 SAMPLE SALE DOCUMENTS	13
B-4 OTHER PRODUCTION	13
B-5 COST INFORMATION	13
SECTION C AUSTRALIAN MARKET & INJURY	14
C-1 PREVAILING CONDITIONS OF COMPETITION IN THE AUSTRALIAN MARKET	14
C-2 CONDITIONS OF COMPETITION	17
C-3 RELATIONSHIP BETWEEN PRICE AND COST IN AUSTRALIA	19
C-4 MARKETING AND SALES SUPPORT IN THE AUSTRALIAN MARKET	24
C-5 DIRECT EVIDENCE OF CURRENT IMPORT COMPETITION IN AUSTRALIA AND ITS IMPACT ON AUSTRALIAN INDUSTRY	24
C-6 EFFECT OF THE ANTI-DUMPING MEASURES	26
C-7 FUTURE DEMAND, SUPPLY AND OTHER ANTICIPATED CHANGES IN THE MARKET	26

INSTRUCTIONS

Why you have been asked to fill out this questionnaire?

The Anti-Dumping Commission (the commission) is conducting a continuation inquiry into certain concrete underlay film (the goods) exported to Australia from Malaysia.

The commission will use the information you provide to determine whether dumping and material injury would be likely to continue or recur if the anti-dumping measures expire.

The commission will collect and use information in accordance with its [Collection and Use of Information Policy](#).

What happens if you do not respond to this questionnaire?

You do not have to complete the questionnaire. However, if you do not respond, do not provide all of the information sought, do not provide information within a reasonable time period, or do not allow the commission to verify the information, it may affect the commission's assessment as to whether the measures should continue. This may result in the measures being allowed to expire.

Therefore, it is in your interest to provide a complete and accurate response to this industry questionnaire, capable of verification.

Extension requests

If you require a longer period to complete your response to this industry questionnaire, you must submit a request to the commission, in writing, for an extension to the due date for all or part of the questionnaire. This request must be made prior to the due date. A request for extension will be rejected if received after the due date.

When considering the extension request, the commission will have regard to:

- the commission's responsibility to conduct the case in a timely and efficient manner
- the reasons why you could not provide a response within the whole period and not only the period remaining between the request and the due date
- ordinary business practices or commercial principles
- the commission's understanding of the relevant industry
- previous correspondence and previous dealings with your company and
- information provided by other interested parties.

More information on extensions can be found in the Customs (Extension of Time and Non-cooperation) Direction 2015 at <https://www.legislation.gov.au/Details/F2015L01736>.

You will be informed of the decision whether your request for an extension has been rejected, granted in full or granted in part. For example, you may be granted an extension to submit all sections except for Section A or you may be granted a shorter extension than you requested.

Submitting a response to the industry questionnaire

Responses to the industry questionnaire should be lodged via SIGBOX, a secure online document repository. Please contact the commission on the email address listed on the cover page to request access to SIGBOX.

In submitting the response to the industry questionnaire, you must answer all questions, include all attachments and spreadsheets, and provide a non-confidential version of your response to this industry questionnaire.

Confidential and non-confidential responses

You are required to lodge a confidential version (OFFICIAL: Sensitive) and a non-confidential version (for publishing on the public record) of your response to this industry questionnaire by the due date. Please ensure that *each page* of information you provide is clearly marked either “**OFFICIAL: Sensitive**” or “**PUBLIC RECORD**”.

All information provided to the commission in confidence will be treated accordingly. The public record version of your questionnaire will be placed on the public record and must contain sufficient detail to allow a reasonable understanding of the substance of the information without breaching confidentiality.

Please be aware that, if at any stage during this inquiry you become aware that you have inadvertently received confidential information submitted by another party, you have a responsibility to:

- notify the commission
- delete the information from your system and
- refrain from using, sharing or retaining the information in any way.

A person is not required to provide a summary for the public record if the commission can be satisfied that no such summary can be given that would allow a reasonable understanding of the substance of the information.

All questionnaires are required to have a bracketed explanation of deleted or blacked out information for the public record version of the questionnaire. An example of a statement to accompany deleted/blacked out text is:

[Explanation of cost allocation through the divisions, by reference to machine hours or weight].

If such an explanation is not provided, the commission may disregard the information in the questionnaire. Where the public record version of your response to the industry questionnaire does not contain sufficient detail, your company may be requested to resubmit your response with the required level of detail or, if deadlines have passed, the commission may not have regard to it.

Verification of the information that you supply

The commission may wish to conduct a verification of your questionnaire response for completeness, relevance and accuracy of the information to your company's records.

The verification is not meant to be a chance for you to provide new or additional information. The commission expects your response to the questionnaire to be relevant, complete and accurate.

The verification may include Commission staff visiting your company to conduct on onsite verification. Any onsite verification typically commences approximately 2 to 4 weeks after the due date of the response to the industry questionnaire. To assist with the planning of a verification, please contact the commission as soon as possible for a potential verification date to be scheduled.

The onsite verification may take 1-3 days. However, in complex cases, it may be scheduled over 5 days. A verification will include a detailed examination of your company's records and we will collect copies of relevant documents. The verification will require the participation of key staff, including your financial accountant, production manager and sales staff. A tour of the manufacturing facility may also be required during the verification.

The commission may elect to undertake an alternative verification methodology, rather than an onsite verification, to satisfy itself of the completeness, relevance and accuracy of the data.

Note that the commission may disregard any data or information that is not verified, including new or additional information provided after the verification visit.

A report will be prepared following the verification, which details the outcomes of the verification. This report will be placed on the public record and may include the publication of the preliminarily-assessed dumping margin. The commission considers that the dumping margin is not confidential information, but rather an aggregate figure derived from confidential data.

You will be provided with an opportunity to comment on the accuracy and confidentiality of the verification report prior to its publication on the public record.

For information on the commission's verification procedures, refer to Anti-Dumping Notice 2016/30 available on the commission's website.

Important instructions for preparing your response

- All questions in this industry questionnaire must be completed. If a question is not applicable to your situation, please answer the question with "Not Applicable" and provide an explanation as to why.
- All questions must be answered in English. An English translation must be provided for documents not originally in English. To the extent that the foreign language version differs, the English translation will be given priority as a matter of interpretation in Australia.
- Clearly identify all units of measurement (e.g. KG) and currencies (e.g. AUD) used. Apply the same measurement consistently throughout your response to the questionnaire.
- Label all attachments to your response according to the section of the questionnaire it relates to (e.g. label the chart of accounts as Attachment A-4.6)
- The data must be created as spreadsheet files in Microsoft Excel.
- If you have used formulas to complete spreadsheets, these formulas must be retained and not hard-coded.
- You must retain all worksheets used in answering the questionnaire. Be prepared to provide these worksheets during the commission's verification of your data.
- If you cannot present electronic data in the requested format contact the commission as soon as possible.
- Where possible, electronic data should be shared with the commission via SIGBOX, a secure online document repository. Please contact the commission to request access to SIGBOX if required.

CHECKLIST

This section is an aid to ensure that you have completed all sections of this questionnaire.

Section	Please tick if you have responded to all questions
Section A Company information	<input type="checkbox"/>
Section B Sales	<input type="checkbox"/>
Section C Australian market & Injury	<input type="checkbox"/>
Declaration	<input type="checkbox"/>
Non-confidential version of this response	<input type="checkbox"/>

Attachments	Please tick if you have provided spreadsheet
A4 Australian sales	<input type="checkbox"/>
A5 Other production	<input type="checkbox"/>
A6.1 CTMS domestic	<input type="checkbox"/>
A6.1 CTMS export	<input type="checkbox"/>
A7 Other factors	<input type="checkbox"/>

GOODS UNDER CONSIDERATION / GOODS SUBJECT TO ANTI-DUMPING MEASURES

The goods subject to anti-dumping measures (the goods) are:

Black or grey, or any colour variations of black or grey, concrete underlay film (also marketed as builders' film), manufactured from either recycled and/or virgin resins, with a thickness ranging between 150-230 microns, and a width from 1-7 metres.

Model Control Code

Details of the model control code (MCC) structure for the goods are detailed in the table below. Export sales data (Section B-2), domestic sales data (Section D-2) and cost to make and sell data (Section G-3, G-4 & G-5) submitted in this response must follow this MCC structure. At a minimum, the data must report sales and cost data separately for each of the mandatory MCC categories identified by the commission.

	Category	Sub-category	Identifier	Sales Data	Cost Data
1.	Impact resistance	Other – Construction / Industrial grade	O	Mandatory	Mandatory
		Medium	M		
		High	H		
2.	Actual thickness	150 – 179 microns	A1	Mandatory	Mandatory
		180 – 230 microns	A2		
3.	Nominal thickness	150 – 179 microns	N1	Mandatory	Optional
		180 – 230 microns	N2		

In constructing a MCC, use a "-" between each category. For example: O-A1-N2

The MCCs will be used to match export models to the identical or comparable domestic models. In addition, the MCCs will be used to determine the profitability of domestic sales in the ordinary course of trade by comparing domestic selling prices to the corresponding cost to make and sell. The MCC may also be used to compare the export price to the cost to make the exported model as part of the constructed normal value.

If there are models manufactured and sold by your company that do not align within the MCC structure above, this should be raised by lodging a submission with the commission as soon as is practicable, but no later than the time this questionnaire is due, otherwise the response may be considered deficient.

SECTION A COMPANY INFORMATION

A-1 Company representative and location

1. Please nominate a contact person within your company:
Name: Austen Ramage
Position in the company: General Manager
Telephone: [REDACTED]
E-mail address: [REDACTED]
2. If you have appointed a representative, provide their contact details:
Name:
Address:
Telephone:
E-mail address:

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

All answers below as per original application.

3. Please provide the location of the where your company's financial records are held.
4. Please provide the location of the where your company's production records are held.
5. Please provide the location of your company's production plant manufacturing the goods under consideration.

A-2 Company information

Please complete the below if there have been any changes in your business since the commission last verified your company as part of *Investigation 554* (1 July 2020). If there have been no changes, please state 'no change from previous verification'.

All answers below as per original application unless provided.

1. What is the legal name of your business?
2. Does your company trade under a different name and/or brand? If yes, provide details.
3. Was your company ever known by a different legal and/or trading name? If yes, provide details
4. Is your company part of a group (e.g. parent company with subsidiaries, common ownership, joint-ventures)?
If yes, provide:
 - (a) A diagram showing the complete ownership structure and
 - (b) A list of all related companies and its functions
5. Is your company or parent company publicly listed?
If yes, please provide:
 - (c) The stock exchange where it is listed and
 - (d) Any principle shareholders¹
If no, please provide:

¹ Principal shareholders are those who are able to cast, or control the casting of, 5% or more of the maximum amount of votes that could be cast at a general meeting of your company.

- (a) A list of all principal shareholders and the shareholding percentages.
- 6. What is the overall nature of your company's business? Include details of the products that your company manufactures and sells and the market your company sells into.
- 7. If your business does not perform all of the following functions in relation to the goods under consideration, then please provide names and addresses of the companies which perform each function:
 - (a) produce or manufacture
 - (b) sell in the domestic market
 - (c) export to Australia and
 - (d) export to countries other than Australia.
- 8. Provide your company's internal organisation chart.
[Most recent attached](#)
- 9. Describe the functions performed by each group within the organisation.
- 10. Does your company produce brochures, pamphlets or other promotional material? If yes, please provide them.

[Attached with submission file](#)

A-3 General accounting information

Please complete the below if there have been any changes in your business since the commission last verified your company as part of *Investigation 554* (1 July 2020). If there have been no changes, please state 'no change from previous verification'.

[All answers to questions below from original application.](#)

- 1. What is your financial accounting period?
- 2. Are your financial accounts audited? If yes, who is the auditor?
- 3. What currency are your accounts kept in?
- 4. What is the name of your financial accounting system?
- 5. What is the name of your sales system?
- 6. What is the name of your production system?
- 7. If your financial accounting, sales and production systems are different, how do the systems interact? Is it electronically or manual? Please provide a detailed explanation and include diagrams.
- 8. Do your accounting practices differ in any way from the generally accepted accounting principles in your country? If yes, please provide details.
- 9. Have there been any changes to your accounting practices and/or policies over the last two years? If yes, please provide details.

A-4 Financial Documents

Please complete the below if there have been any changes in your business since the commission last verified your company as part of *Investigation 554* (1 July 2020). If there have been no changes, please state 'no change from previous verification'.

OFFICIAL: PUBLIC RECORD

1. Please provide the two most recently completed annual reports and/or financial statements for your company and any other related companies involved in the production and sale of the goods.
[Provided – Annual Report FY24+FY25](#)
2. If the financial statements in A-4.1 are audited, provide a copy of the audit management letters from your auditor accompanying the audited financial statements.
[Attached as above](#)
3. If the financial statements in A-4.1 are unaudited, provide for each company:
 - (a) the tax returns relating to the same period and
[Tax return FY24 attached](#)
[Tax return FY 25 TBC](#)
 - (b) reconciliation of the revenue, cost of goods sold, and net profit before tax between the financial statements and tax returns.
[FY24+25 both provided \(attached confidential documents\), tax return for FY25 not lodged yet, so only 24 attached.](#)
4. Does your company maintain different profit centres? If yes, provide profit & loss statements for the profit centre that the goods falls into for:
 - (a) the most recent financial year and
 - (b) the period.
[NA](#)
5. If the period is different to your financial period, please provide:
 - (a) Income statements directly from your accounting information system covering the most recent financial period and the period or
 - (b) Quarterly or half yearly income statements directly from your accounting system covering the most recent financial period and the period.
[NA](#)
6. Please provide a copy of your company's trial balance (in Excel) covering the period and the most recent financial year.
[Attached as at 31/12/25](#)
7. Please provide your company's chart of accounts (in Excel).
[Attached as trial balance above](#)

If any of the documents are not in English, please provide a complete translation of the documents.

SECTION B AUSTRALIAN SALES

B-1 Australian sales process

Please complete the below if there have been any changes in your business since the commission last verified your company as part of *Investigation 554* (1 July 2020). If there have been no changes, please state 'no change from previous verification'.

No changes unless commented below.

1. Provide details (and diagrams if appropriate) of the Australian sales process of your company and representatives (e.g. agents) including:
 - (a) Marketing and advertising activities
Direct sales – ie manage account relationships through Sales Manager
 - (b) Price determination and/or negotiation process
Pricing set by [redacted] [price setting mechanism]
 - (c) Order placement process
Orders by [redacted], or via email to [redacted] [order setting mechanism]
 - (d) Order fulfilment process and lead time
Order placed [redacted] [lead time]
 - (e) Delivery terms and process
Typically FIS, ex-works or Customer Pick Up occasionally
 - (f) Invoicing process
Invoice on despatch
 - (g) Payment terms and process
Either COD or credit account

2. Are any customers of the goods sold in Australia related to your company? If yes, please provide a list of each related customer and provide details on how the selling price is set.
Not applicable

3. If sales are in accordance with price lists or price extras list, provide copies of these lists.

4. Do your selling prices vary according to the distribution channel identified? If yes, provide details. Real differences in trade levels are characterised by consistent and distinct differences in functions and prices.

Typically sales prices for similar goods are determined by competitive market pricing irrespective of distribution channel. Distribution channels are:

- To concrete accessory reseller
- To hardware reseller

5. Did you provide on-invoice discounts and/or off-invoice rebates to any customer or an associate of the customer in relation to the sale of the goods in Australia during the period? If yes, provide a description and explain the terms and conditions that must be met by the customer to obtain the discount and/or rebate.

Not applicable

6. Did you issue any credit or debit notes (directly or indirectly) to the customer or associate of the customer in relation to the sale of the goods in Australia during the period? If yes, provide details of the credit/debit notes including the reasons the credit/debit notes were issued.

Within A4 Australian Sales

OFFICIAL: PUBLIC RECORD

7. In establishing the date of sale, the commission will normally use the date of invoice as it best reflects the material terms of sale.:
- (a) Are you claiming a date other than the invoice date as the date of sale?
 - (b) If you are claiming a date other than the invoice date as the date of sale, why does this date better reflect the material terms of sale? Provide evidence to support your claim.

Note that any date of sale claim, other than the invoice date, that is made after submitting a response to this questionnaire may not provide the commission with sufficient time to assess the claim and may not be considered.

[Invoice on date of sale](#)

8. Were there any factors outside of your control which affected your ability to sell the goods in Australia during the review period? If yes, provide details of these factors and how they affected your patterns of trade over the review period
- [NO](#)

B-2 Australian sales listing

1. Please provide an updated copy of **A4 Australian sales** to include all Australian sales of concrete underlay film invoiced up to 31 December 2025.

Provided

B-3 Sample sale documents

1. Select the two largest invoices by value and provide the following documentation where applicable:
 - Contracts
 - Purchase order and order confirmation
 - Commercial invoice and packing list
 - Proof of payment, remittance advice and accounts receivable ledger
 - Documents showing bank charges
 - Invoices for inland transport.

Attached - Confidential B3 Sample Documents

B-4 Other production

1. Please provide an updated copy of **A5 Other production** to include up to 31 December 2025.

This is in A4 sales – [REDACTED]

B-5 Cost information

1. Please provide an updated copy of worksheets **A6.1 CTMS domestic** and **A6.2 CTMS export** to include up to 31 December 2025.

SECTION C AUSTRALIAN MARKET & INJURY

C-1 Prevailing conditions of competition in the Australian market

1. Describe the Australian market for the goods and the prevailing conditions of competition within the market, including:

(a) Provide an overall description of the Australian market for the goods which explains its main characteristics and trends over the past five years

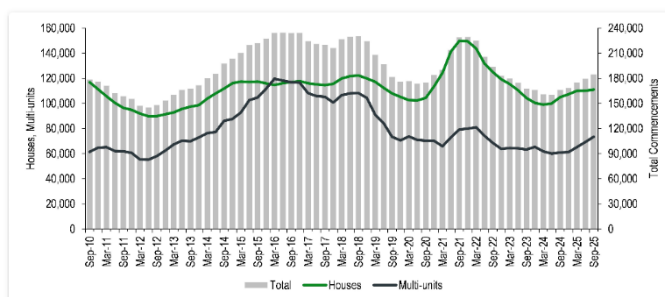
(b)

The Australian market for builders film is primarily for concrete slab on ground construction – this is typically applications that would fall under Australian Standard AS2870 where the film is used as a moisture barrier to protect the structure. The primary driver for demand for this product would be new build starts.

Elsewhere, the term builders film has been adopted as a general name used for industrial packaging film. We call this product 'industrial film' and it may be used for industrial packaging applications such as protecting heavy equipment or wrapping large products for delivery, protective flooring, or into some agricultural applications.

In general, [REDACTED]

New Home Commencements, Moving Annual Total, Australia



Source: ABS

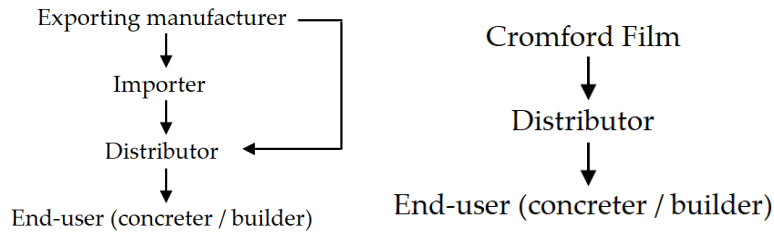
Some notable periods for the purpose of this continuation enquiry are as follows:

- The COVID period the plastics manufacturing market in Australia (but also regionally) [REDACTED].
- There were two separate occasions where injurious pricing found its way to the market – both were investigated as anti-circumvention enquiries, initially for <2m film, and subsequently for the importation of 'grey' film.

In both instances there were market prices that did not correlate with the new level of import pricing we had seen from Malaysia post the duties being imposed.

(c) Provide the sources of demand for the goods in Australia, including the categories of customers, users or consumers of the product

Generally, the Australian market operates on a [REDACTED]
[REDACTED]:



Over the past 5 years, [REDACTED]
[REDACTED].

- (d) Provide an estimated proportion (%) of sales revenue from each of those sources of demand listed in (b)

As above – circa [REDACTED] % is direct evidenced by cash sale account used.

- (e) Describe the factors that influence consumption/demand variability in Australia, such as seasonal fluctuations, factors contributing to overall market growth or decline, government regulation, and developments in technology affecting either demand or production

The market for builders film fluctuates predominantly on new housing starts from an annual perspective – this can be driven by Government policy (ie new home owner grants or immigration policy), as well as prevailing Economic conditions. there is usually a low period during January, and also again around Easter.

- (f) Describe any market segmentations in Australia; such as geographic or product segmentations

Builders film in Australia is segmented by application – residential , commercial and infrastructure.
Geographical segmentation occurs - for example in NSW + SA high impact builders film is required whereas in Tas, VIC, QLD, WA + NT – medium impact builders film is deemed acceptable.
The different product groups – medium and high impact, are referenced in the attachment – AS2870.

- (g) Provide an estimated proportion of sales revenue from each of the market segments listed in (e)

Whilst difficult to give an exact number as we supply through [REDACTED]
[REDACTED].

- (h) Describe the way in which Australian manufactured and other imported goods compete in the Australian market

Generally, locally manufactured and imported goods will compete head on in the Australian market.
In many instances, [REDACTED]
[REDACTED]

- (i) Describe the ways that the goods are marketed and distributed in the Australian market and

The goods are predominantly marketed through wholesale and industrial suppliers, specialist trade retailers and hardware chains.

- (j) Describe any other factors that are relevant to characteristics or influences on the market for the goods in Australia.

AS2870 compliance as products are categorised by impact resistance, economic influences such as a slowdown in the building sector, value of Australian dollar also has a significant effect on imported film landed cost.

Provide any available documentary evidence to support the responses made to questions D-1(a) to (i).

- 2. Describe the commercially significant market participants in the Australian market for the goods at each level of trade over the investigation period. Include in your description:
names of the participants

[REDACTED]

- the level of trade for each market participant (e.g., manufacturer, reseller, original equipment manufacturer (EOM), retailer, corporate stationer, importer, etc.)-

Manufacturer-Cromford Film

Importers- [REDACTED]

Resellers- [REDACTED]

Retail- [REDACTED]

- a description of the degree of integration (either vertical or horizontal) for each market participant and

Other than Cromford Film, the most vertically integrated businesses would be those that import on their own behalf – for example [REDACTED] and will also resell to the market either directly to end users or through their own resale to end users.

- an estimation of the market share of each participant.

Very difficult to know individually. We estimate Cromford Film hold approx. [REDACTED]-[REDACTED]% market share and estimate other local packaging type companies who have the ability to manufacture likely hold in the area of [REDACTED]% so our estimation of imported film is approx. [REDACTED]%.

- 3. Identify the names of commercially significant importers in the Australian market for the goods over the investigation period and estimate their market share. Specify the country each importer imports from and their level of trade in the Australian market, if known.

[REDACTED]

Market intelligence information we have been advised directly or second hand indicates that the [redacted]. As mentioned above it is difficult to attain the accurate percentages of market share each importer holds, but based on industry knowledge [redacted] all hold significant market share.

4. Describe the regulatory framework of the Australian market for the goods as it relates to competition policy, taxation, product standards and the range of the goods. Provide a copy of any regulation described, if available.

AS2870 – describes the quality requirements of medium and high impact builders film – provided as appendix.

AS/NZS 4347.9 - sets out a means of determining the thickness of polyethylene film, AS/NZS 4347.6 - sets out the method of determining the impact resistance of flat sheet material.

5. Describe any entry restrictions for new participants into the Australian market for the goods. Your response could include information on:
 - resource ownership
 - patents and copyrights
 - licenses
 - barriers to entry
 - import restrictions and
 - government regulations (including the effect of those government regulations).

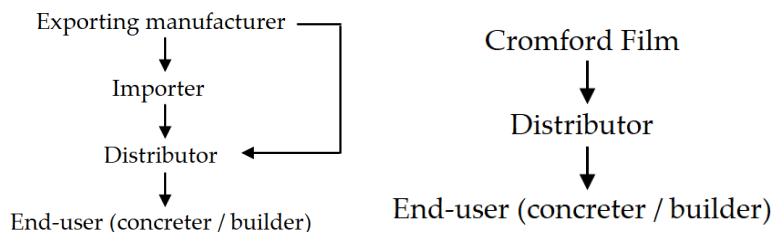
There is very little entry restriction for new participant in the Australian market – the product could be sourced from many manufacturing entities, providing the film dimensions are met and in some instances that the physical property / quality requirements of the standard are met by the manufacturer.

Furthermore, there is very little / no oversight or market policing of quality by relevant government or industry bodies – typically providing the film is branded AS2870.

In responding to question 6 ensure that relevant regulations are referenced.

C-2 Conditions of competition

1. Provide a diagram which describes the Australian market structure for the goods, ensuring that all the categories of participants are included. In this diagram use linkages to illustrate the different levels of trade and distribution channels within the Australian market.



2. Generally describe the range of the goods offered for sale in the Australian market. The description should include all goods under consideration including those produced by your company. Your description could include information about:
- quality differences-
There are three different quality levels for the Goods in Australia.
For branded concrete underlay there is medium and high impact available with high impact considered the superior product due to a higher weight impact test as part of AS2870. Medium impact film still requires a drop dart impact test under AS2870 however the weights are not as heavy as high impact.
There are also a range of industrial films sold not used as a concrete underlay. These are typically not branded and so there is no requirement for impact testing.
 - price differences-
For Cromford Film sales, high impact sells for approximately [redacted] % premium over medium impact, with industrial black films selling at [redacted].
 - supply/availability differences-
there is no significant supply or availability difference – both products can be manufactured on the same blown film extrusion lines and recycled resins are generally available for both.
 - technical support differences-
[redacted]
 - the prevalence of private labels/customer brands-
AS2870 requires that the manufacturer / distributors name is continuously branded on the film.
From a Cromford Film perspective at least [redacted] % of the film we produce has a customer brand on the label (this is usually the [redacted] brand).
Most of the imported film is manufactured for the importer's brand only.
 - the prevalence of generic or plain labels
We have seen examples of imported film with generic labels, this is non-compliant without a distributor/manufacturer brand included on the printing.

For industrial films (other) – there is no requirement for the film to be printed, sometimes this can be generic branding.
 - the prevalence of premium labels and
Not prevalent.
 - product segmentation.
Product segmentation medium impact everywhere except specific projects that require a high impact product in these states, due to soil type or architect drawings, NSW + SA – high impact.
3. Describe the end uses of the goods in the Australian market from all sources.
Main purpose is slab on ground construction for domestic and commercial properties, agricultural applications, and industrial packaging applications.
4. Describe the key product attributes that influence purchasing decisions or purchaser preferences in the Australian market. Rank these preferences or purchasing influencers in order of importance.
1. [redacted]
 2. [redacted]

5. Have there been any changes in market or consumer preferences in the Australian market for the goods in the last five years? If yes, provide details including any relevant research or commentary on the industry/sector that supports your response.

There has not been any change in market / consumer demand or preference in the Australian market, other than some very meagre interest in recycled content.

6. What changes, if any, do you anticipate in the Australian market for the goods in the next five years? This could be changes in:

- Market or consumer preferences-
With a change in ESG reporting requirements and the continuing plastic recycling crisis in Australia, we do see that there will be more focus on recycled content and carbon footprint of products used in the construction industry.

- Cost of production (e.g. raw material or energy costs)

[REDACTED]

- Source of imports (e.g. new countries)

We are continuing to monitor imports from other countries.

[REDACTED]

- Source of Australian production (e.g. new manufacturers)-

[REDACTED]

7. If available, provide examples of competition with exporters from Malaysia. Include, if available:

- A list of common customers- the companies buying locally and importing we are aware of are-

[REDACTED]

- Competition at applicable levels of trade (e.g. distributor or retail)

There is import pressure at all levels of trade.

- Any market intelligence concerning pricing from Malaysia

Refer market intelligence file provided

- Any example of lost sales or volume, or instances where you have lowered prices to compete with imports from Malaysia.

Refer market intelligence file provided

C-3 Relationship between price and cost in Australia

1. Describe the importance of the Australian market to your company's operations. In your response describe:

- (a) The proportion of your company's sales revenue derived from sales of the goods in Australia and

Black builders film remains a crucially important staple of our Pendle Hill business, since the duties have been imposed we have

[REDACTED]

[REDACTED]

(b) The proportion of your company's profit derived from sales of the goods in Australia.

The proportion of our company's profit derived from the sales of the goods is demonstrated in the table below:

	P2	P3	P ⁿ (6months)
Total Revenue	[REDACTED]	[REDACTED]	[REDACTED]
Traded Sheet Revenue	[REDACTED]	[REDACTED]	[REDACTED]
GUI Revenue	[REDACTED]	[REDACTED]	[REDACTED]
Profit from GUI	[REDACTED]	[REDACTED]	[REDACTED]
Total Profit	[REDACTED]	[REDACTED]	[REDACTED]

[REDACTED]

In responding to question 1 please provide evidence supporting calculations.

2. Is your organisation/business entity the price leader for the goods in the Australian market? If no, please explain the reasons behind your response and specify the name(s) of the price leaders.

[REDACTED]

3. Describe the nature of your product pricing (e.g., market penetration, inventory clearance, product positioning, price taker, price maker, etc.) and your price strategies (e.g., competition-based pricing, cost-plus pricing, dynamic pricing, price skimming, value pricing, penetration pricing, bundle pricing, etc.) in Australia. If there are multiple strategies applied, please rank these by importance. If there are different strategies for different products, please specify these. Provide copies of internal documents which support the nature of your product pricing.

[REDACTED]

4. Explain the process for how the selling prices of the goods for the Australian market by your business are determined. Provide copies of internal documents which support how pricing is determined.

[REDACTED]

5. How frequently are your Australian selling prices reviewed? Describe the process of price review and the factors that initiate and contribute to a review. Provide the names and positions of all persons involved.

[REDACTED]

6. Rank the following factors in terms of their influence on your pricing decisions in the Australian market, with the most important factor ranked first and the least important factor ranked last:

[REDACTED]. However in general we would rank as follows, particularly in instances when we share a position with a customer:

- Competitors' prices [REDACTED]
- Purchase price of raw materials [REDACTED]
- Cost to make and sell the goods [REDACTED]
- Level of inventory [REDACTED]
- Value of the order [REDACTED]
- Volume of the order [REDACTED]
- Value of forward orders
- Volume of forward orders [REDACTED]
- Customer relationship management [REDACTED]
- Supplier relationship management [REDACTED]
- Desired profit [REDACTED]
- Brand attributes [REDACTED]
- Other [please define what this factor is in your response]

7. Describe the relationship between selling price and costs to make and sell in the Australian market. Does your company maintain a desired profit margin for the goods? If not, does your company seek to maintain a desired profit margin for the goods? Provide copies of internal documents which support your response to this question.

[REDACTED]

8. Do you offer price reductions (e.g., commissions, discounts, rebates, allowances or credit notes) in the Australian market? If yes, provide a description and explain the terms and conditions that must be met by the customer to qualify. Explain how the cost to make and sell are considered in establishing these price reductions. Provide copies of internal documents which support your claims in response to this question.

[REDACTED]

9. Do you offer bundled pricing in the Australian market? If yes, explain how the pricing for bundled sales is determined. Explain how the costs to make and sell are considered in establishing these bundled prices for the goods. Provide copies of internal documents which support your claims in response to this question.

[REDACTED]

10. Does the volume of sales to a customer or the size of an order influence the selling price? If yes, advise how volume is used to determine selling prices. Explain how the costs to make and sell are considered in establishing volume based prices for the goods. Provide copies of internal documents which support your claims in response to this question.

[REDACTED]

[REDACTED]

11. Does your organisation/business entity use sales contracts in the Australian market? If yes:
- (a) What proportion of your sales revenue would come from contracted sales versus uncontracted sales?
[REDACTED]
 - (b) Do you offer exclusivity contracts? If yes, what proportion of your sales revenue would come from exclusivity contracts?
[REDACTED]
 - (c) How frequently are sales contracts renegotiated?
[REDACTED]
 - (d) How frequently are price reviews conducted between contracts?
[REDACTED]
 - (e) Do you provide opportunities for price reviews for customers within contracts? If yes, provide a description of the process and an explanation of the circumstances that might lead to a price review.
[REDACTED]
 - (f) Do changes in your costs to make and sell enable you to review prices for customers within contracts?
[REDACTED]
 - (g) Provide a list of the customers under contract during the investigation period and copies of the two largest contracts in terms of sales revenue.
[REDACTED]

12. Provide copies of any price lists for the goods used in the Australian market during the investigation period. If you do not use price lists, describe the transparency of your prices in the Australian market
[Refer market intelligence file](#)

13. How do you differentiate pricing for different products/models of the goods in the Australian market? Describe how your products are grouped for price differentiation and the methodology used. Describe any cost to make or selling cost differences between differentiated products. Describe how these cost differences (if any) influence pricing decisions. Provide copies of internal documents which support your claims in response to this question.

[REDACTED]

14. Do you tier or segment your Australian customers for the goods in terms of pricing? If yes, provide:
- (a) a general description of how this is done
 - (b) list the factors that influence pricing differentiation in different tiers or segments and
 - (c) explain how cost to make and selling costs are considered in making pricing decisions for different tiers or segments.

[REDACTED]

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Provide copies of internal documents which support your claims in response to this question.

15. Do you sell the goods to related entities in Australia? If yes, describe how prices are set for related party transactions and specify what proportion of your sales in terms of sales revenue are to related party entities. If available, provide copies of any internal documents relevant to establishing pricing to related parties.

No related entity sales for the goods during investigation period.

C-4 Marketing and sales support in the Australian market

1. How does your company market the goods in the Australian market? Include in your response the value proposition used (e.g., competitive price, superior quality, reliability, availability, etc.).

[REDACTED]

2. Does your company conduct brand segmentation in the Australian market for the goods? If yes, describe the brand segmentation used and provide the proportion of sales revenue derived from each brand segment.

No

3. Provide examples of your Australian advertising of the goods over the past five years. If you have not used advertising in Australia, provide examples of any other promotion campaigns you have conducted over the investigation period.

[REDACTED]

4. How many people are in your Australian sales team and where are they located? In general terms, how are they remunerated? If they are offered performance pay based on sales, describe the performance indicators used to establish the performance pay. Provide copies of internal documents which support your claims in response to this question.

[REDACTED]

5. Describe what parameters are provided to sales staff to assist in establishing pricing for the goods when negotiating sales with customers. Provide copies of internal documents which support your claims in response to this question.

With a small sales team,

[REDACTED]

C-5 Direct evidence of current import competition in Australia and its impact on Australian industry

1. Describe current status of import competition in the Australian market, including:
(a) the major Australian importers, traders or end users seeking to supply the goods into the Australian market

In general import competition

[REDACTED]

- (b) end users your company does not supply, but who solely import the goods from overseas

[REDACTED]

- (c) end users who source the goods from both your company and from overseas suppliers.

[REDACTED]

- (d) provide any specific details relating to exports from Malaysia.

In general, we are monitoring a significant change in macro trade from SE Asia due to the US tariff issues starting in 2025. In many different product segments, we are seeing SE Asian based plastics manufacturers aggressively targeting sales outside of US due to the lack of tariffs in these other countries. Anecdotally,

[REDACTED]

2. Provide examples during the inquiry period which demonstrate how import competition has influenced your pricing in the Australian market, including any specific information in relation to exports from Malaysia. Please provide evidence to support these examples.

We have provided evidence of [REDACTED]

3. Provide examples during the review period that demonstrate the loss, or threatened loss, of sales volume to an import source, including from Malaysia. Please provide evidence to support these examples

4. Describe any other circumstances in which imported goods have affected your company that you consider to be relevant to this inquiry

Cromford has lodged anti-circumvention applications on two occasions against Malaysia whilst the duties have been imposed. This was discussed in our initial application for continuation, and Cromford maintains that these two separate instances showed a clearly targeted approach to selling at low price points into the Australian market due to the high volumes available.

Both instances alerted Cromford to very cheap import pricing that looked to be unachievable if the duties were being paid by importers.

C-6 Effect of the anti-dumping measures

1. Describe the economic condition or financial performance of your company since the anti-dumping measures were imposed in relation to Malaysia.

There is no doubt that the dumping duties being imposed have had a meaningful impact on our business. In general, when looking at pricing outside of the periods preceeding circumvention enquiries –

[REDACTED]

Throughout the period of duties, the business has focused on [REDACTED]

[REDACTED]

2. Did any customer or end user switch or change suppliers following the imposition of anti-dumping measures? If yes, provide the following details and information:

(a) name of customer/end user

[REDACTED]

(b) the name of the customer's previous supplier

[REDACTED]

(c) the name of the customer's new supplier

[REDACTED]

(d) if known, the reason/s for the customer switching or changing suppliers. Provide any supporting evidence

[REDACTED]

(e) if the customer decided to source goods from your company, the volume or quantity of goods supplied by your company to this customer. Provide any supporting evidence such as copies of relevant contracts, purchase orders, invoices etc.

[REDACTED]

C-7 Future demand, supply and other anticipated changes in the market

1. Do you anticipate any changes in patterns of supply and demand in the Australian market over the next 5 years? What are your expectations for your own production of the goods over that period?

We anticipate that in general supply and demand in Australia will [REDACTED]

[REDACTED]

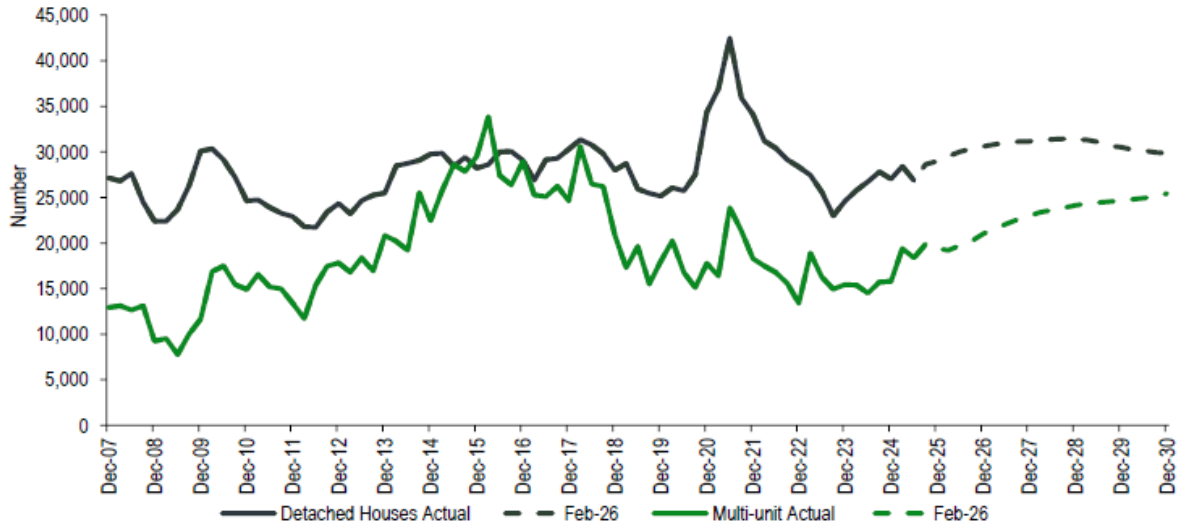
[REDACTED]

2. What do you consider to be primary economic indicators that correlate with the demand for the goods and may provide some indication of likely future demand?

New Housing Demand is the primary economic driver that creates demand for our product – we refer to annual HIA housing forecast graph below showing predicted new starts to 2029:

HIA Forecast - Australia

Source: HIA Economics



3. If any of your supply arrangements with your customers are subject to contracts, identify all contracts that are likely to be renegotiated or revised in the next 1 to 5 years. Provide details on the annual volume or quantity of these goods supplied in accordance with each contract.

[Redacted]

4. Do you have any direct evidence that demonstrates that your current customers would be willing to switch to or to increase supply from an import source?

[Redacted]

For example with [Redacted]

5. Are there any anticipated technological or product developments within the next five years that are likely to affect demand, your supply, your costs or pricing of the goods?

As above answer – [Redacted]

6. Do you anticipate any change in consumer preferences in the coming five years? If yes, provide details including any relevant research or commentary on the industry/sector that supports your response?

Other than potential shift in demand for Australian recycled product as part of expanded ESG reporting, we do not see any consumer preference change based on what we know today.