

10 July 2025

Director
Investigations 3
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601

Email: investigations3@adcommission.gov.au

Note from the Anti-Dumping Commission

The commission received this submission on 10 July 2025 but did not upload it to the Electronic Public Record for Review 667.

The commission has uploaded this submission following a reminder from Capral received on 23 June 2026.

Dear Director,

Public File

Revocation Review No. 667 – Aluminium Extrusions exported from Malaysia

In relation to the above revocation review (**REV 667**) Capral Limited (**Capral**) refers to the submission by Press Metal Aluminium (Australia) Pty Ltd (**PMAA** and/or **the applicant**) dated 30 May 2025¹ and makes the following comments.

I. Injury to the Australian industry is obvious

In relevant part, PMAA state in their submission that:²

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.

It appears that PMAA continue to place reliance on what is its now-dated and irrelevant revocation application arguments – namely that a detailed assessment of Capral's financial performance from publicly available annual and half yearly reports is of sufficient evidence to satisfy the legislative test for revocation.

Capral reiterates from earlier representations in this inquiry that PMAA is in no position to make such a claim – firstly on the basis that the Commission's revocation decision and the injury assessment embedded therein cannot and will not hinge on Capral's published financial statements, and secondly that PMAA can in no way allege a lack of injury to Capral given the lack of visibility it has on the Australian industry's like-goods position (both quantitative and qualitative) over the inquiry period and prior.

For the Commission's reference and PMAA's reminder, Capral refers to its submission dated 5 May 2025³ where it provided the quantitative and qualitative position of the like goods for the Australian industry. The commercial-in-confidence version of this submission is provided at Confidential Attachment 1.

¹ EPR folio no. 11.

² At https://www.industry.gov.au/sites/default/files/adc/public-record/2025-06/667_-_11_-_submission_-_applicant_-_press_metal_aluminium_australia_-_pmbas_price_during_the_investigation_period.pdf

³ Available here: https://www.industry.gov.au/sites/default/files/adc/public-record/2025-05/667_-_8_-_submission_-_australian_industry_-_capral_limited_-_submission_on_dumping_or_likelihood_of_dumping_by_pmbs_continuing_or_recurring.pdf



If you have any questions concerning this submission, please do not hesitate to contact Capral's representative Mr Chad Uphill on 0412 377 603.

Yours sincerely

