

5 August 2026

By email

Investigations1@adcommission.gov.au

██████████
Director
Investigations 1, Investigations Branch
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601

Dear ██████████

**Revocation Review 667 – Exports of Certain Aluminium Extrusions from Malaysia –
New Exporter and Importer Questionnaires**

We refer to your letter to us dated 22 July 2026. We also refer to the covering email from the Commission under which that letter was sent, which attached a new exporter and importer questionnaire issued to, respectively, PMB Aluminium Sdn Bhd (**PMBA**) and Press Metal Aluminium (Australia) Pty Ltd (**PMAA**), as well as deficiency advices in relation to the REQ and RIQ which those entities respectively submitted in 2025.

Adoption of new review period

PMBA and PMAA are extremely disappointed that the Commission has, despite the matters raised in our letter to the Commission dated 13 July 2026, decided to adopt a new review period, and to request that PMBA and PMAA submit a new REQ and RIQ.

Your letter dated 22 July 2026 stated that the Commission had considered submissions made by interested parties (presumably including our letter of 13 July 2026) regarding the review period in response to ADN 2026/082. However, it did not address any of the concerns raised in our letter of 13 July 2026, or explain why the Commission had decided, completely against all precedent, and despite those concerns, to change the review period.

As we explained in our letter of 13 July 2026, PMBA and PMAA have spent considerable time, and incurred significant expense, preparing the REQ and RIQ submitted in 2025 in response to the Commission's request. As you know, following the Commission's decision to suspend (on 16 January 2026), and then to resume (on 19 June 2026), the Revocation Review, PMBA and PMAA spent still further time and money reviewing the data submitted in 2025, preparing supplementary information in relation to that data, and engaging with the Commission about it.

They are concerned that if they now have to go through that process all over again:

- it will absorb a further significant amount of management time, and they will incur further significant costs to external consultants and advisers; and

- the costs they have incurred and the effort they have already gone to in this review *at the Commission's request* will have been completely wasted.

It is also worth understanding that the burden of that resourcing requirement, and those costs, falls on PMAA, which is a relatively small Australian company, seeking to maintain employment of more than 60 employees in Australia.

While PMBA has distribution lines to a number of countries, the Australian distribution line and its importance to the Press Metal Group is only small in comparison to the overall business of Press Metal. As a result, the full financial and resource burden of complying with the Commission's investigations, inquiries and reviews falls upon PMAA.

In its endeavours to ensure the collection and submission of correct data, PMAA sends its own employees, with an external consultant, to PMBA in Malaysia each time an REQ is required to be submitted. We would ask the Commission to keep this in mind in the future.

Way forward

Extension of time to respond to questionnaires

Notwithstanding the views expressed in our letter of 13 July 2026, PMBA and PMAA will reluctantly complete and submit a further REQ and RIQ, to avoid being found to be non-cooperative, and the implications that would have.

In our letter of 13 July 2026, we explained that PMBA would need a minimum of 8 to 12 weeks to complete and submit a new REQ, and that PMAA would need a minimum of 6 to 8 weeks to complete and submit a new RIQ. Despite that, the Commission has only allowed until 28 August (a little over 5 weeks) for the REQ, and until 21 August (a little over 4 weeks) for the RIQ.

PMBA proposes to submit its response to the REQ by 25 September 2026, and PMAA proposes to submit its response to the RIQ by 11 September 2026. They request extensions accordingly. Please let us know if the Commission will grant those extensions.

Use of all data

PMBA and PMAA also submit that, having put them to the effort of supplying data for a full year, and then seeking data for a further full year, the Commission should use all of the data provided to it.

That is, the Commission should adopt a 2-year review period (covering 1 April 2024 to 31 March 2026) for its review and determination of the variable factors applying to PMBA's exports for the purposes of this review. This lengthier period, of course, will provide a more accurate and reliable basis for the Commission to assess whether PMBA's exports are being dumped than would a shorter period.

PMBA and PMAA are confident that, consistently with the periods prior to that 2-year period, PMBA will be found by the Commission not to have engaged in dumping throughout those 2 years. When the Commission makes that finding, they will submit that this is an even more compelling reason to conclude that dumping will not occur again in the future, and that the measures should be revoked insofar as they concern PMBA.

Given that the Commission has already reviewed the data for the original review period, and that the process of verification of the data for the 2-year period will not take significantly longer than for the new (later) 1-year period, we cannot see any proper reason why the Commission would decline to do so.

We would be grateful if you would confirm that the Commission will review and analyse the data for the full 2-year period when assessing whether there has been dumping and whether dumping is likely to occur again in the future. If the Commission does not agree to do so, we ask that it explain why it will not.

We look forward to the Commission's response to these issues as soon as possible.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Andrew Korbel', written in a cursive style.

Andrew Korbel

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