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14 August 2026

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

Email: investigations1@adcommission.gov.au

Dear Director,

Public File

Revocation Review No. 667 – Aluminium Extrusions exported from Malaysia

I. **Introduction**

In relation to the above inquiry (**REV 667**), Capral Limited (**Capral**) makes the following submission in response to the submission dated 5 August 2026 by PMB Aluminium Sdn Bhd (**PMBA**) and Press Metal Aluminium (Australia) Pty Ltd (**PMAA**) (together, **Press Metal**), in which Press Metal requests that the Commission adopt a two-year review period of 1 April 2024 to 31 March 2026 and assess the variable factors applying to PMBA's exports over that period.

Capral objects to that request in the strongest possible terms. The Commission has adopted a correct and contemporary review period of the 12 months ending 31 March 2026 Press Metal has advanced no proper basis for departing from it. The …*proper reasons*… for the Commission to decline the request, which Press Metal itself invites the Commission to give, are several and fundamental.

II. **Results-oriented proposal**

Press Metal's request appears to be driven by the outcome it anticipates rather than by any trade remedy methodological merit. Press Metal states that it is …*confident*… PMBA will be found not to have dumped across the two-year period, and that it intends to rely on that finding to argue that the measures should be revoked.

The selection of the assessment period should not be set with reference to a period an interested party calculates will yield the most favourable outcome. A request is this type is not a proper basis for expanding the assessment period.

Press Metal's proposal would reintroduce the original 12-month inquiry period by adding it to the revised period. That Press Metal earlier supplied data for the superseded period does not oblige the Commission to use it. Data collected for a review period that has since been superseded does not become a proper basis for a 24-month assessment merely because administrative effort was exerted in its collection.

III. **The correct assessment period is 12 months, not 24**

Across every form of proceeding under Part XVB of the *Customs Act 1901*, the variable factors – normal values, export prices, and the dumping margins derived from them – are assessed over 12 months. This is the case whether the proceeding is an original investigation, a review of measures (whether an annual review or, as here, a revocation review), or a continuation inquiry. There is no type of proceeding in which the variable factors are assessed over a period of 24 months.

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The 12-month standard reflects the Commission's *Dumping and Subsidy Manual* (the Manual) and consistent Commission practice, and is consistent with the WTO Anti-Dumping Agreement and the recommendation of the WTO Committee on Anti-Dumping Practices concerning the periods of data collection, under which the period for dumping investigations should normally be 12 months and in any event no less than six months.[1] Press Metal identifies no provision of the Act, the Regulations, the Manual, or any Commission precedent that supports a 24-month variable factors assessment, as there is none.

A dumping margin calculated over 24 months is also mathematically unsound. It would combine two distinct pricing and cost environments (including movements over the two years in the LME, the MJP premium, input and conversion costs, and exchange rates) into a single averaged figure that accurately represents neither year.

To the extent Press Metal's request relies on the premise that a longer period is …*more accurate and reliable*…, it conflates the variable factors assessment period with the longer period over which injury is separately examined. The two are distinct, and the longer-term assessment of injury trends provides no justification for doubling the period over which the variable factors are assessed.

IV. The review is forward-looking and measures must be contemporary

Akin to a continuation, a revocation review is forward-looking – it requires an assessment of whether dumping, and the injury from it, would be likely to continue or recur if the measures were revoked.

The revised inquiry period is the most relevant evidence of current conditions, and therefore of the likely position going forward. Circling back a further 12 months dilutes the assessment with dated data. The Commission adopted the 12 months ending 31 March 2026 to capture current conditions, and the two-year proposal would defeat that purpose.

Variable factors are also intended to reflect current conditions so that the measures remain contemporary and appropriate to operate prospectively. Measures set by reference to a 24-month averaged period would incorporate older data into measures that are applied going forward. This would render them non-contemporary from the outset. This is contrary to the objective of a Division 5 review, which is to ensure that measures continue to reflect the variable factors as they currently stand.

V. Conclusion

For these reasons, there is no proper basis for the two-year review period Press Metal proposes, and the request should be declined.

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

For and on behalf of the Australian aluminium extrusion industry.

[1] WTO Committee on Anti-Dumping Practices, Recommendation Concerning the Periods of Data Collection for Anti-Dumping Investigations, G/ADP/6 (adopted 5 May 2000), which provides that the period of data collection for dumping investigations should normally be 12 months, and in any case no less than six months, ending as close to the date of initiation as is practicable. Refer https://docs.wto.org/dol2fe/Pages/SS/directdoc.aspx?filename=Q:/G/ADP/6.pdf&Open=True