Australian Government
Department of Industry, Science and Resources

Anti-Dumping Commission

Continuation No 696

Concrete underlay film exported from Malaysia

Comparative variable factors assessment

Great Cosmo Industries Sdn. Bhd.

The Anti-Dumping Commission (the commission) has calculated a preliminary dumping margin for Great Cosmo Industries Sdn. Bhd. (GCI).

The commission's approach to the variable factors and consideration of all alleged dumping will be addressed in the *Statement of Essential Facts 696* (SEF 696) due to be published on 24 September 2026. This report details the findings and recommendations of the case team in the commission and may not reflect the commission's final position.

Table 1 is the commission's preliminary assessment based on the information currently available and may not reflect the commission's final position.

Export price	Normal value	Dumping margin
Section 269TAB(1)(a)[1]	Section 269TAC(2)(c)	**16.67%**

Table 1: Summary of preliminary variable factors for GCI.

The commission determined that no onsite or virtual verification would be conducted for GCI. GCI was remotely verified in *Investigation 554 – Concrete underlay film from Malaysia* (INV 554), and the commission was satisfied in that case that GCI's information was complete, accurate and relevant for determining the applicable variable factors.[2] There have been no major changes to GCI's production process or costing methodology since INV 554. The commission has also undertaken 2 anti-circumvention inquiries[3] concerning concrete underlay film since INV 554 was concluded, providing ongoing insight into the Australian industry, market conditions and export of concrete underlay film (the goods) into the Australian market.

Accordingly, the commission considers that the verified information from INV 554, including relevant findings and conclusions concerning GCI, provides a reliable benchmark against which GCI's response to the exporter questionnaire (REQ) in this inquiry can be assessed, and is a reasonable approach in the circumstances.

In support of the analysis and findings detailed in this report, the commission has prepared the comparative analysis work program at **Confidential Attachment 1**.

[1] All legislative references are to the *Customs Act 1901* (Cth) (the Act)

[2] EPR 554, document 25 and 48 refers

[3] EPR 606 and EPR 671

1. Response to the exporter questionnaire

GCI's response to the REQ was received within the legislated period[4] and contained relevant information regarding:

- its role in the export of the goods to Australia
- sales of like goods that it manufactured, into both export and domestic markets
- the cost of production of like goods, including selling, general and administrative expenses (SG&A).

GCI is considered a cooperating exporter for the purpose of this inquiry.

The public version of GCI's REQ is available on the electronic public record (EPR) for this case on the commission's website at www.adcommission.gov.au.[5]

1.1 Summary of material revisions

The following assessment details revisions of the data supplied in GCI's REQ and response to additional questions.

Material revision 1: Production volume (REQ B-4, G-8 & G-10)

Description: The commission identified differences in production volume totals reported in GCI's capacity utilisation, upwards cost reconciliation and non-goods reconciliation, which were affecting manufacturing overhead allocations and were inconsistent with sales production volumes. **Resolution:** GCI provided revised information, including production output volume and value data, to address this issue.

Material revision 2: Colour differentiation in Domestic CTM (REQ G-3)

Description: The domestic CTM in GCI's REQ was not differentiated by colour. The commission identified a raw material price premium associated with producing certain colours of the plastic (such as orange, opaque, clear, etc.) and sought an updated version to break down the domestic CTM by colour. **Resolution:** GCI provided revised domestic CTM data including a breakdown by colour.

Material revision 3: Reconciling CTM data (REQ 6.1, G-7.2, G-7.4 and G-8.2)

Description: The commission identified inconsistencies between the raw material costs reported in the CTM tables (Australian, Domestic and Third Country) and the costs reported in GCI's raw material cost calculations and raw material purchases (when annualised and averaged). **Resolution:** GCI provided revised CTM data and updated the allocation to Australian, Domestic and Third Country CTM tables.

[4] GCI's REQ was received on or before the extended legislated due date. GCI received two extension requests of the initial due date in respect of Parts C to I. The revised due date was 26 March 2026. GCI provided further responses on 17 April 2026, to address deficiencies the commission identified in GCI's response of 26 March 2026, and on 6 July 2026 to address additional questions the commission identified in GCI's responses.

[5] EPR 696, document 5

Material revision 4: Reconciling CTM data (REQ G-6.1 (b) and G-6.1 (c))

Description: GCI's REQ did not apportion wages or overhead costs by production facility when reporting labour and manufacturing overheads.

Resolution: GCI provided a revised version of labour and manufacturing overheads and updated the CTM tables.

Material revision 5: Separation of Paper Core from film weight (Australian Sales)

Description: GCI's REQ did not separate the weights of the paper core and the plastic film, referencing total roll weight only.

Resolution: GCI provided revised Australian sales data separating out the weights of the paper core and the plastic film.

Material revision 6: Colour differentiation in Third Country Sales (REQ F-2)

Description: GCI's REQ did not differentiate Third Country sales by colour. The commission identified price differences (premiums) between certain plastic colours (non-goods) in the Domestic Sales and Australian Sales data and sought an updated version of Third Country sales broken down by colour.

Resolution: GCI provided revised Third Country sales data including a breakdown by colour.

Material revision 7: MCC missing from Domestic Cost to Make (REQ G-3)

Description: The Domestic Sales table included sales for MCC M-A2-N2, however, the domestic CTM data was missing for that MCC.

Resolution: GCI provided revised Domestic CTM data, including for the missing MCC, which aligned with the same MCC identified in Domestic Sales.

2. Export price

For the purposes of this preliminary assessment, the commission proposes to determine an export price for GCI under section 269TAB(1)(a).

Section 269TAB(1)(a) provides that the export price of any goods exported to Australia is the price paid or payable for the goods by the importer, less transport and other costs arising after exportation, where the goods have been exported to Australia otherwise than by the importer and have been purchased by the importer from the exporter in arms length transactions.

As outlined in section 2.3 below, the commission found that all of GCI's Australian exports of the goods to Australia were arms length transactions.

2.1 Who is the exporter?

The commission considers that GCI is the exporter of the Australian export goods because it:

- produced the Australian export goods at its manufacturing facility in Malaysia
- is named as the supplier on the commercial invoices
- is named as the consignor on bills of lading
- arranged and paid for inland transport to the port of export

- arranged and paid for port handling charges at the port of export
- arranged and paid for ocean freight (where applicable).

2.2 Who is the importer?

GCI had multiple Australian customers during the inquiry period. For all transactions, the commission considers GCI's Australian customers to be the importers of the Australian export goods.

Based on the transactions examined, the commission is satisfied that for each transaction, GCI's Australian customer:

- is named as the consignee on bills of lading
- is named as the importer on the import declarations to the ABF.

2.3 Were the Australian export sales sold at arm's length?

Unrelated customers

For all unrelated customer transactions, the commission finds that GCI sold the Australian export goods **at arms length** as defined under section 269TAA.[6]

For these transactions, the commission does not find that:

- there was consideration for the goods other than price
- a relationship between a buyer, a seller or their associates appeared to influence the price
- a buyer or buyer's associate directly or indirectly received compensation, reimbursement, or another benefit for, or relating to, any part of the price.

For these transactions the commission notes that GCI:

- sold goods at similar prices to all unrelated customers
- sold goods at similar prices to other sellers in the Australian market
- appeared to genuinely negotiate the price with unrelated customers.

Related customers

GCI did not have any related Australian customers.

3. Normal value

The commission has assessed the following matters that are relevant to the calculation of the normal value.

[6] This also includes consideration of the findings in INV 554.

3.1 Did the exporter produce and sell like goods for the domestic market?

The commission finds that during the investigation period, GCI produced and sold like goods for domestic home consumption.

The commission finds that these goods were 'like goods' because the domestic goods are identical to, or closely resemble, the Australian export goods. The commission has described its reasons below.

3.1.1 Physical likeness

The commission considers that GCI's domestic and Australian export goods are physically alike as they are manufactured to the same or similar physical properties, that is, black underlay film (no grey colour was identified) with a thickness ranging between 150-230 microns, and a width from 1-7 metres. The costs of production for models sold domestically and for export are the same.

The commission notes that GCI sells a broader range of underlay film colours (outside the scope of the goods description) in its domestic market compared to its Australian export sales.

3.1.2 Production likeness

GCI produced the goods and like goods at the same facilities, using the same types of raw material inputs and production processes.

3.1.3 Commercial likeness

The goods and like goods compete in the same market sectors, can be interchangeable and use similar distribution channels.

3.1.4 Functional likeness

The goods and like goods are considered functionally alike, and have the same end uses.

3.2 Were the domestic sales at arm's length?

All of GCI's domestic sales of like goods in Malaysia were arms length transactions.

3.3 Do the accounting records comply with generally accepted accounting principles?

The commission finds that GCI's accounting records for the investigation period comply with the generally accepted accounting principles of Malaysia. This is based on the auditor's opinion contained in the financial statements provided for the financial years ended 30 September 2023 and 2024, which concluded that GCI's financial accounts comply with Malaysian Private Entities Reporting Standards and the requirements of the Companies Act 2016 in Malaysia.

3.4 Did the production records reasonably reflect competitive market costs?

The commission is satisfied that GCI paid fair market rates for its inputs, such as plastic pellets, plastic scrap and other raw materials.

3.5 Related party suppliers

GCI provided a listing of its raw materials purchases at G-7.4 of its REQ. For one order, the raw material was supplied by the customer, as discussed below in section 3.6. However, that customer is not considered a related party.

3.6 Were domestic sales in the ordinary course of trade?

The commission assessed whether each domestic sale was in the ordinary course of trade (OCOT). The commission found that all but one of the sales (referenced in section 3.5 above) was in the OCOT – this sale was excluded from normal value calculations.

3.7 Is there a low volume of relevant domestic sales?

The commission assessed the volume of relevant domestic sales as a percentage of the volume of relevant export sales. This volume was calculated using kilograms of film produced, and forms part of the commission's sufficiency test.

The commission found that the total volume of relevant domestic sales during the period of investigation was significantly lower than the 5% sufficiency threshold required by the commission to calculate the normal value under section 269TAC(1); therefore, the commission will calculate the normal value as a constructed normal value under section 269TAC(2)(c).

3.8 Adjustments to compare export price and normal value

The commission is satisfied there is sufficient information to justify the following adjustments in accordance with section 269TAC(9). The commission considers the adjustments in Table 2 to be necessary to ensure a fair comparison of normal values and export prices.

Adjustment type	Deduction/addition
Export inland transport	Add an amount for export inland transport
Export handling & port charges	Add an amount for handling & port charges
Other export charges (e.g., pallet fumigation)	Add an amount for other export charges
Export credit terms	Add an amount for export credit charges

Table 2: Summary of adjustments

4. Appendices and attachments

Confidential attachment 1: Comparative analysis work program

Confidential appendix 1: Export price

Confidential appendix 2: Cost to make and sell

Confidential appendix 3: Normal value

Confidential appendix 4: Dumping margin