

30 October 2020

The Director
Investigations 3
Anti-Dumping Commission
GPO Box 1632
Melbourne Victoria 3001

Email: investigations3@adcommission.gov.au

PUBLIC FILE

Dear Sir/Madam

Investigations 540 and 541 – Mill Finish and Surface Finish aluminium extrusions exported from Malaysia – Submission of Milleon Extruder Sdn Bhd Malaysia

I. Introduction

I refer to the further submission (undated) by Milleon Extruder Sdn Bhd (“Milleon”) recently placed on the Public File (on 28 October 2020) in Investigation No’s 540 and 541 involving mill finish and surface finish aluminium extrusions exported from Malaysia.

II. Premium sales

Milleon has again referred to its alleged premium products that it sells domestically and does not export to Australia. It is suggesting that the Anti-Dumping Commission (“the Commission”) must adjust the domestic normal value for “premium value added services” that it does not incur on export sales.

This further Milleon submission details the value added services it claims apply only to the premium sales namely, precision cutting, quality control checks including flatness and curving, dimensional checks, and individual wrapping. Capral considers that these quality control checks undertaken by Milleon would be conducted for all products (whether domestic or export sales).

Capral submits that Milleon would provide technical services and quality control checks for all of its product – irrespective of whether it describes the goods as “premium” in nature or whether they are sold on the domestic or export markets. As such, no adjustment for service is warranted.

III. Adjustment for management sales

Milleon has stated that it is seeking a downward adjustment for certain management sales expenses that “relate to the cost of personnel who are directly involved in making sales to non-commission customers”. This explanation does not of itself qualify Milleon for the adjustment.

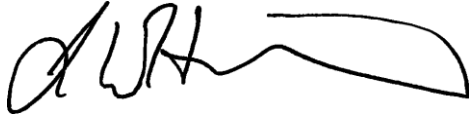
Milleon seeks to prove an explanation as to how the claimed expenses can be differentiated from other selling and general administration (SGA) expenses. However, the explanations provided by Milleon do not demonstrate the expenses being not similar to usual SGA expenses. As such, the estimates provided by Milleon cannot be relied upon as being directly and solely incurred in relation to the non-commission sales.

IV. Conclusion

Capral does not consider that the further explanations provided by Milleon warrant adjustments being made to Milleon's normal value for premium sales or for certain SGA expenses incurred on non-commission sales.

If you have any questions concerning this submission, please do not hesitate to contact me on (02) 8222 0113.

Yours sincerely

A handwritten signature in black ink, appearing to read 'LHAWKINS', with a long horizontal flourish extending to the right.

Luke Hawkins
General Manager – Supply and Industrial Solutions