

27 November 2020

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

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Dear Sir/Madam

**Investigations 540 and 541 – Mill Finish and Surface Finish aluminium extrusions exported from Malaysia – Additional submission by Milleon Extruder Sdn Bhd Malaysia dated 17 November 2020**

I refer to the additional further submission by Milleon Extruder Sdn Bhd (“Milleon”) of 17 November 2020. Milleon states that this additional submission ‘restates’ earlier representations concerning its claim for it refers to as a ‘premium’ adjustment.

Capral Limited (“Capral”) reiterates its earlier representations that the claimed quality control checks undertaken by Milleon are consistent with any manufacturer seeking to ensure that it supplies quality products to its customers.

Milleon refers to the checking and compliance as ‘value-add’ activities. This description is an overstatement of the activities undertaken – there is no physical altering of the goods via an additional manufacturing process. The claimed ‘precision cutting’ of the goods does little more than define the length of the goods. The subject goods have not undergone any additional transformation and thus are manufactured in the same manner as the goods exported to Australia.

Aluminium extrusions are typically examined for flatness and bow testing, along with an examination of the required dimensional requirements. The wrapping of the goods following production is typical for most aluminium extrusions to limit marking and damage.

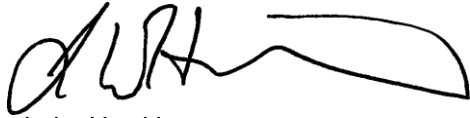
Milleon claims that the exported goods are not subjected to the same quality control checks. Capral rejects this suggestion as Milleon as a manufacturer would seek to ensure the quality of its goods sold on the export market.

Capral confirms its earlier representations that Milleon’s claim for adjustment for activities that may be described as usual business practice cannot be justified. Milleon is seeking to reduce its normal value (and hence its dumping margin) and the representations contending a unique and peculiar value-added activity must be rejected.

Capral requests the Commission to confirm Milleon’s normal value as reflected in Milleon’s exporter verification report.

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