

29 January 2021

Mr Gavin Crooks  
Assistant Director  
Investigations 3  
Anti-Dumping Commission  
Level 35  
55 Collins Street  
Melbourne Victoria 3000

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**Public File**

Dear Mr Crooks

**Investigations No. 540 and 541 – Submission by Press Metal Berhad – in response to Statement of Essential Facts**

We refer to Press Metal Berhad's ("PMB") submission received by the Anti-Dumping Commission ("the Commission") on 22 January 2021. The submission is concerned with normal value determination and certain adjustments.

*(a) Level of trade adjustment*

PMB contends that the Commission has adjusted normal value for level of trade differences (that did not relate to all sales) based upon profit differences. This would appear to have been the case for mill finish product (i.e. Invest 540) as in coated products (Invest 541) adjustments were made on the basis of selling price.

It would be reasonable for the Commission to make an adjustment based upon profit differentials if there was minimal differences in selling prices for customers at different levels of sale.

*(b) Domestic v export packaging*

PMB references the Commission's verification visit in Invest 362 where no adjustment was made for packaging costs. The Commission has conducted a number of investigations subsequent to the original investigation involving Malaysian exporters (i.e. Invest 362) and it is evident that exporters do incur a higher cost associated with the packaging of goods for export as opposed to domestic sales.

The Commission's adjustment for packaging costs for goods exported to Australia is warranted.

*(c) Stillage return costs*

Capral notes that PMB acknowledges that "...the ADC reduced the PMB to PMAA gross invoice value by this stillage return charge" and then states that the PMB Exporter Verification Report is silent on this adjustment.

It is anticipated that the reduction is incorporated and doesn't require any further explanation.

*(d) Extended normal value*

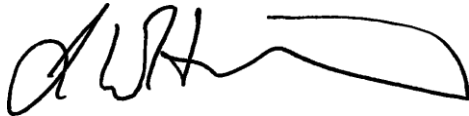
PMB is concerned by the Commission's determination of weighted average normal values versus weighted average export prices.

The Commission's methodology is consistent with the requirements of subsection 269TACB. The Commission has calculated weighted-average normal values in accordance with subsection 269TACB(2) and can determine weighted-average normal values down to a one-month period for alignment of domestic and export prices.

The Commission's determination of normal values for PMB is consistent with the legislative requirements and does not require amendment.

If you have any questions concerning this submission please do not hesitate to contact me on (02) 8222 0113 or Capral's representative Mr John O'Connor on (07) 3342 1921.

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