



## PUBLIC RECORD – NON-CONFIDENTIAL

12<sup>th</sup> October 2021

Case number: 554/ADN2021/126  
Product: Certain Concrete Underlay Film  
From: Malaysia  
Contact person: Ng Peg Shi  
Email: [pegshi@plastik-v.com](mailto:pegshi@plastik-v.com)  
Role: Exporter

The Director – Investigations 4  
Anti-Dumping Commission  
GPO Box 2013  
Canberra Act 2601

Dear Director,

## RE : COMMENTS TO THE PRELIMINARY AFFIRMATIVE DETERMINATION FOR PLASTIK V SDN BHD

We have received the preliminary affirmative determination (PAD) report and would like to comment on the labour cost and SG&A. Please find our findings and comments as below for your consideration and review:-

1. Total labour cost as per trial balance includes subcontract labour (7000/303) and Foreign Worker (F/W) recruitment expenses (7000/305) which needs to be excluded as it is not part of DIRECT LABOUR COST. Further, this costs comes under recruitment costs **not related to the Goods Under Consideration** (GUC) but rather subcontract labour, where it is a purchase for products not related to the GUC and the subcontractor charged the company for their processing cost which includes profit margin, packaging and transport cost. (Please refer to Confidential Appendix GL – General Ledger and Confidential Appendix SB 1 – 7). For F/W recruitment expenses, it is a non-payroll expense [REDACTED] [Example of the F/W recruitment expenses] which is not part of direct labour cost. (Please refer to Confidential Appendix GL – General Ledger and Confidential Appendix FW 1 – 3).
2. For SG&A, below are some points that we consider should be excluded from the SG&A as **it is not related to the GUC**.
  - a) Brokerage – RM [REDACTED] [value & details] Please refer to Confidential Appendix GL – General Ledger and Confidential Appendix BR – Brokerage Invoice.)



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- b) Legal & Professional fees – RM [REDACTED] [value & details] Please refer to Confidential Appendix GL – General Ledger and Confidential Appendix LG – Legal and Professional Fees Invoices.)
- c) Collection – RM [REDACTED] [value & details] Please refer to Confidential Appendix GL – General Ledger and Confidential Appendix CL – Collection Invoices.)
- d) Bills Discounting Interest – RM [REDACTED] [value & details] Please refer to Confidential Appendix GL – General Ledger.)
- e) Bill Discounting Charges and Commission – RM [REDACTED] [value & details] Please refer to Confidential Appendix GL – General Ledger.)
- f) LC charges & commission – RM [REDACTED] [value & details] Please refer to Confidential Appendix GL – General Ledger.)
- g) BG charges & commission – RM [REDACTED] [value & details] Please refer to Confidential Appendix GL – General Ledger.)
- h) Bills collection charges & commission – RM [REDACTED] [value & details] Please refer to Confidential Appendix GL – General Ledger.)
- i) FC Trust receipt interest – RM [REDACTED] [value & details] Please refer to Confidential Appendix GL – General Ledger.)
- j) FC Trust receipt charges – RM [REDACTED] [value & details] Please refer to Confidential Appendix GL – General Ledger.)

Above are all the findings that we seek your consideration and hope you will review PAD again based on the above requests. Please feel free to contact me if you have any questions or clarifications.

Thank you!



# PLASTIK V SDN. BHD.

(Company No. 169983-P)  
(SST No. B10-1808-21002802)

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Name : NG PEG SHI

Designation : GENERAL MANAGER