



PT MULIAGLASS  
FLOAT DIVISION

Anti Dumping Notice 29210010 Inquiry No 575

Attention:- Investigations3@adcommission

Dear Sirs,

We wish to make a submission in relation to the above Inquiry in response to the Applicants Claims in paragraph 6 as follows:-

**Claim:- 1**

- the existing anti-dumping measures have been effective in limiting dumping and material injury since they were last continued in 2016:

**Response:-**While initially this may be correct,subsequently and most certainly in the period under investigation, 2 of the countries against whom dumping duties were imposed simply exported from their alternative manufacturing facilities in both Malaysia and the United Arab Emirates at prices which Muliaglass with a dumping duty of only 0.3%, could not compete with and as a consequence our exports volumes declined from previous years.

**Claim:-2**

- exporters from China, Indonesia and Thailand have maintained their distribution channels to Australia and have continued to export the goods to Australia:
- exporters from China and Indonesia retain excess capacity that may be directed to Australia:

**Response:-**

It is fortunate for processors other than Viridian that this is true because the much reduced capacity of after the closure of the Ingleburn Float Line in Sydney,Oceania Glass could not possibly meet the volumes required by the overall Australian and New Zealand Markets,this condition can be substantiated by the requests to Muliaglass for significant volumes of CFG to supplement the requireements of both Oceania and their downstream processor Viridian.



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### Claim:3

- recent exports of the goods to Australia from Indonesia have been at dumped prices. Although recent exports to Australia from China and Thailand do not appear to be at dumped prices, the expiration of measures would likely lead to a resumption of dumping from China and Thailand, because exporters from these countries would seek to match alternative sources of supply; and
- if the measures were not continued, exporters from China, Indonesia and Thailand would seek to increase volumes by decreasing prices, and the Australian industry would suffer material injury as a result. Oceania Glass claims, in particular, that it would suffer reduced sales volumes and market share, contributing to increases in the unit cost of production that could not be recovered in selling prices. Oceania Glass maintains that the CFG market in Australia continues to be competitive, particularly in respect of price. The Australian Industry manufacturing like goods would be exposed to a recurrence of the material injury through price undercutting, price suppression, reduced profits and profitability if the measures expired.

### Response:-

If recent exports to Australia from Muliaglass are found to be at dumped prices it will not be attributable to reduced pricing since the validity of our price, other than a small adjustment early in 2020 to help offset the depreciation of the AUD v the USD, was constant during the investigation period, instead it will prove to be as a consequence of having to subsidise the huge increases in the cost of sea freight which could not be passed onto their Australian customers. This subsidy resulting in the FOB pricing being sacrificed.

Exports from China and Thailand to Australia whether at dumped pricing or not are not significant because volumes are small as a consequence of Thailand moving its volume exports to the United Arab Emirates and China moving its exports to Malaysia, this is quite obvious from the statistics available from the ABF which has Malaysia as the largest exporter and the UAE and the second largest.

Continuing the measures or not will be against China, Indonesia or Thailand will have little or no effect to the performance or profitability of Oceania Glass because there will be no measures at all on the volume exports from the main exports from Malaysia who are the price leaders and also from the United Arab Emirates.



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## General

We would also make comment that in our view the real downward pressure on pricing of both Australian CFG and processed product is a consequence of the cheap imports of finished product from China and until this issue is addressed the performance of all Australian Glass companies will continue to be adversely affected.

In conclusion while Muliaglass has always cooperated positively in any all previous Anti- Dumping Investigations we strongly feel that on this occasion the period chosen for the Investigation is not reasonable to be used as the reference periode.

The year 2020 encompassing the COVID -19 pandemic was as we all are aware a year of extreme disruption and abnormality and should never have been selected as the investigation period . We strongly request that that the review will be postponed one year , until the adverse effect of pandemic covid-19 is subdue.

Cikarang, 9 March 2021

  
  
PT. MULIAGLASS  
Jghan Dharmawan  
Deputy COO  
PT.MULIAGLASS