



PT MULIAGLASS
FLOAT DIVISION

Cikarang, 6th May 2021

To : Director, Investigation 3
Anti-Dumping Commission
Department of Industry, Science, Energy and Resources
Australian Government

Re : 3rd Submission, ADN 20210010 Inquiry N0.575

We thank to the ADC verification team for your time spent during the verification and we trust these verifications are able to support on our submission. We kindly request that this information together with our concerns receive due consideration by Mr Dale Seymour, the Commissioner of the ADC prior to any decisions are made in regards to Dumping Margins that may or may not be applicable to PT Muliaglass.

We are satisfied and happy with your professional approach in regard to the verification. However, we are most disappointed that these verifications are not taking into consideration of the points and concerns that we have raised in our previous submissions and only concentrated on proofing whether our accounting records are valid. Besides the accounting submission that we have submitted, to be frank, we also do hope that some points below should also be reviewed since it is highly related to the fact if this investigation is fair to all parties or it is only benefiting for certain individual company. Monopoly is fine if it is based on the company's own capability but shouldn't sacrifice the overall public interest.

1. History of PT. Muliaglass and Australia Float Glass manufacturers.

(official – Sensitive/Confidential)

Comments:

- a) The ownership of the Australia float glass factories has been keep changing however each owner still continue for the anti-dumping investigation against PT Muliaglass even under condition that the dumping rate of PT Muliaglass in 2016 is as low as 0.3%. This sounds very unreasonable for us since each takeover should already process certain kind of "write off" in debt plus improving on the management systems so the question is if and why the injuries are still continuing? Future more, Oceania Glass own both upstream and downstream process which they are the "leader" in the market in terms of the trend of pricing, service, designs in the market. With proper management in the manufacturing and it is unbelievable that they are still able to claim injuring. Even if there is any injuries, it must because of the miss-management and this is not fair sacrificing public interest just to afford them such protection.
- b) No matter how many times changes of ownership, the most current owner are still asking PT Muliaglass for support as a supplier to cover their shortfall in capacity to supply the market. This would indicate that they acknowledge that PT Muliaglass is a reliable, reasonable professional company and not a company who only knows how to dump prices. The act of requesting the continuation of an anti-



PT MULIAGLASS
FLOAT DIVISION

c) dumping investigation against PT Muliaglass is therefore in our view only because of their own private interest.

d) (official – Sensitive/Confidential)

e) (official – Sensitive/Confidential)

2. (official – Sensitive/Confidential)

3. Indonesia is no longer the biggest exporter to Australia according to the data as below which is provided by “AUSTRALIAN BUREAU OF STATISTICS”.

(official – Sensitive/Confidential)

Malaysia & Middle East (UAE & Saudi) are around (official - Sensitive/Confidential) of the total import CFG to Australia and these countries exports will have much more impact on Oceania Glass than Indonesia which is only (official – Sensitive/Confidential) of total imports. By not including Malaysia nor Middle East into the investigation it appears that the purpose is to take out Indonesia from Australia market which is against Asia Free Trade policy.

(official – Sensitive/Confidential)

We strongly request the commissioner to look into on this issue by checking the business activity of Oceania Glass.

In the last few years, PT Muliaglass are never been the leaders of the pricing trend they just follow Oceania Glass pricing or try (without success) to compete against imports from Malaysia or Middle East. Which clearly indicates that if there is necessity to initiate anti-dumping investigations and it should be against to Malaysia the UAE and Saudi Arabia manufacturers, not PT Muliaglass.

4. PT Muliaglass domestic and other countries demand has been relatively strong in the last few years therefore PT Muliaglass has no reason for dumping the glass to Australia.

(official – Sensitive/Confidential)

PT Muliaglass has consistently added to the production capacity by implementing new technology in the production but the portion selling to Australia is stable which demonstrates that PT Muliaglass only wants to serve the old customers and have no intention to expand the market.

5. In the dumping review result published in 2017, PT Muliaglass dumping rate was determined to be 0.3%. Since that time PT Muliaglass volumes of export to Australia have steadily declined, the main reason given from our customers is because PT Muliaglass prices are not able to compete with Domestic manufacture or imports from Malaysia & Middle East. PT Muliaglass decided not to follow the price war but just maintaining the service to our old customers with the maximum that we can do. It



PT MULIAGLASS
FLOAT DIVISION

can show the result that the sales of PT Muliaglass have dropped significantly ever since 2019.

6. As stated in PT Muliaglass first submission, 2020 is really not a good representative or fair and reasonable year to make judgments due to the pandemic. (official – Sensitive/Confidential)

(official – Sensitive/Confidential)

Explanation:

- a. (official – Sensitive/Confidential)
- b. (official – Sensitive/Confidential)
- c. (official – Sensitive/Confidential)
- d. (official – Sensitive/Confidential)
- e. (official – Sensitive/Confidential)

7. We have seen the submission from Oceania Glass in which is accusing that PT Muliaglass exports volumes keep increasing even in the years of 2019 – 2020 and requesting for new dumping duties to be applied in between 19.2% - 36.1% to PT Muliaglass. From the data which we have submit and becoming a big question marks how and where Oceania Glass are arriving at this calculation. And if the data provided are not reliable and we believe that whatever Oceania Glass claim might become a big question marks to all parties.

We trust that our above explanation is clear and we are willing to provide more information to you if you need. Once again, we really hope that the commissioner will take into consideration our above explanation and not only focus on the finance report as it does not take into account what is actually happening in the market. We are hoping that the commissioner could put the public interest as first priority and give all parties a fair judgement.

Thank you for kindest attention and consideration.

Sincerely yours,



PT. MULIAGLASS

Johan Dharmawan
Deputy COO
PT Muliaglass