



Australian Government
Department of Industry, Science,
Energy and Resources

Anti-Dumping Commission

Exporter Questionnaire

Case number: 591

Product: Aluminium Extrusions

From: Malaysia

Inquiry period: 1 July 2020 to 30 June 2021 (the period)

Response due by: 22 October 2021

Email enquiries to: investigations1@adcommission.gov.au

Anti-Dumping Commission website: www.adcommission.gov.au

Responses to the exporter questionnaire must be submitted via SIGBOX. Please contact the Commission on the above email address to request access to SIGBOX.

SECTION I DOMESTIC MARKET

I-1 Prevailing conditions of competition in the domestic market

1. Describe the domestic market for the goods and the prevailing conditions of competition within the market, including:

(a) Provide an overall description of the domestic market which explains its main characteristics and trends over the past five years;

PMBA does not have that information

(b) Provide the sources of demand for the goods in the domestic market, including the categories of customers, users or consumers of the product;

(c) Provide an estimated proportion (%) of sales revenue from each of those sources of demand listed in (b);

PMBA does not have that information

(d) Describe the factors that influence consumption/demand variability in the domestic market, such as seasonal fluctuations, factors contributing to overall market growth or decline, government regulation, and developments in technology affecting either demand or production;

PMBA does not have that information

(e) Describe any market segmentations in the domestic market; such as geographic or product segmentations;

PMBA does not have that information

(f) Provide an estimated proportion of sales revenue from each of the market segments listed in (e);

PMBA does not have that information

(g) Describe the way in which domestically produced goods and imported goods compete in the domestic market;

Because Malaysia has a significant volume of aluminium extrusion mills, imports make up only a very small portion of the market and do not really compete

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- (h) Describe the ways that the goods are marketed and distributed in the domestic market; and



- (i) Describe any other factors that are relevant to characteristics or influences on the domestic market for the goods.

Provide documentary evidence to support the responses made to questions 1(a) to (i).

2. Provide a diagram which describes the domestic market structure for the goods, ensuring that all categories of participants are included. In this diagram use linkages to illustrate the different levels of trade and distribution channels within the domestic market.

PMBA does not have this diagram

3. Describe the commercially significant market participants in the domestic market for the goods at each level of trade over the investigation period. Include in your description:

- 1 names of the participants;

*Press Metal group
LB
Genesis
Premium Aluminium
EverPress Aluminium Industries
Alumac Industries
Superb Aluminium Industries
Kamco Aluminium
Milleon Extruder*

- 2 the level of trade for each market participant (e.g., manufacturer, reseller, original equipment manufacturer (EOM), retailer, corporate stationer, importer, etc.);

PMBA does not have this information

- 3 a description of the degree of integration (either vertical or horizontal) for each market participant; and

PMBA does not have this information

- 4 an estimation of the market share of each participant.

PMBA does not have this information

4. Identify the names of commercially significant importers in the domestic market for the goods over the investigation period and estimate their market share. Specify the country each importer imports from and their level of trade in the domestic market, if known.

No commercially significant importers

5. Describe the regulatory framework of the domestic market for the goods as it relates to competition policy, taxation, product standards and the range of the goods. Provide a copy of any regulation described, if available.

No regulations PMBA is aware of

6. Describe any entry restrictions for new participants into the domestic market for the goods. Your response could include information on:

[REDACTED]

- resource ownership;
- patents and copyrights;
- licenses;
- barriers to entry;
- import restrictions; and
- government regulations(including the effect of those government regulations).

In responding to question 6 ensure that relevant regulations are referenced.

I-2 Goods in the domestic market

1. Generally describe the range of goods offered for sale in the domestic market. The description should include all like goods, including those produced by your company. Your description could include information about:

- 5 quality differences;

Like aluminium extrusions we consider a commodity and generally have similar quality regardless of the supplier

- 6 price differences;

Larger mills with economies of scale produce at lower prices

- 7 supply/availability differences;

[REDACTED]

8 technical support differences;

[REDACTED]

9 the prevalence of private labels/customer brands;

[REDACTED]

10 the prevalence of generic or plain labels;

Same as above

11 the prevalence of premium labels; and

Do not exist

12 product segmentation.

Do not exist

2. Describe the end uses of the goods in the domestic market from all sources.

[REDACTED]

3. Describe the key product attributes that influence purchasing decisions or purchaser preferences in the domestic market. Rank these preferences or purchasing influencers in order of importance.

[REDACTED]

4. Identify if there are any commercially significant market substitutes in the domestic market for the goods.

*Plastic
Steel
Timber*

5. Have there been any changes in market or consumer preferences in the domestic market for the goods in the last five years? If yes, provide details including any relevant research or commentary on the industry/sector that supports your response.

[REDACTED]

I-3 Relationship between price and cost in the domestic market

1. Describe the importance of the domestic market to your company's operations. In your response describe:

- (a) The proportion of your company's sales revenue derived from sales of the goods in the domestic market; and

[REDACTED]

- (b) The proportion of your company's profit derived from sales of the goods in the domestic market.

[REDACTED]

In responding to question 1 please provide evidence supporting calculations.

2. Is your organisation/business entity the price leader for the goods in the domestic market? If no, please explain the reasons behind your response and specify the name(s) of the price leaders.

[REDACTED]

3. Describe the nature of your product pricing (e.g., market penetration, inventory clearance, product positioning, price taker, price maker, etc.) and your price strategies (e.g., competition-based pricing, cost-plus pricing, dynamic pricing, price skimming, value pricing, penetration pricing, bundle pricing, etc.) in the domestic market. If there are multiple strategies applied, please rank these by importance. If there are different strategies for different products, please specify these. Provide copies of internal documents which support the nature of your product pricing.

[REDACTED]

4. Explain the process for how the selling prices of the goods for the domestic market by your business are determined. Provide copies of internal documents which support how pricing is determined.



5. How frequently are your domestic selling prices reviewed? Describe the process of price review and the factors that initiate and contribute to a review. Provide the names and positions of all persons involved.

Monthly in line with LME

6. Rank the following factors in terms of their influence on your pricing decisions in the domestic market, with the most important factor ranked first and the least important factor ranked last:

- Competitors' prices 3
- Purchase price of raw materials 1
- Cost to make and sell the goods 2
- Level of inventory 6
- Value of the order 4
- Volume of the order 4
- Value of forward orders 6
- Volume of forward orders 6
- Customer relationship management 6
- Supplier relationship management 6
- Desired profit 5
- Brand attributes 6
- Other [please define what this factor is in your response]

Some of these rankings have same number because they said at the same level

7. Describe the relationship between selling price and costs to make and sell in the domestic market. Does your company maintain a desired profit margin for the goods?

Cost to make and sell include the single largest factor, that is LME international aluminium price which makes up the single largest and the dominant factor determining price. Other cost to make and sell factors much less significant

8. Do you offer price reductions (e.g., commissions, discounts, rebates, allowances or credit notes) in the domestic market? If yes, provide a description and explain the terms and conditions that must be met by the customer to qualify. Explain how the cost to make and sell are considered in establishing these price reductions. Provide copies of internal documents which support your claims in response to this question.

[REDACTED]

9. Do you offer bundled pricing in the domestic market? If yes, explain how the pricing for bundled sales is determined. Explain how the costs to make and sell are considered in establishing these bundled prices for the goods. Provide copies of internal documents which support your claims in response to this question.

[REDACTED]

10. Does the volume of sales to a customer or the size of an order influence your selling price in the domestic market? If yes, advise how volume is used to determine selling prices. Explain how the costs to make and sell are considered in establishing volume based prices for the goods. Provide copies of internal documents which support your claims in response to this question.

[REDACTED]

[REDACTED]

11. Does your organisation/business entity use sales contracts in the domestic market? If yes:

(a) What proportion of your sales revenue would come from contracted sales versus uncontracted sales?

[REDACTED]

- (b) Do you offer exclusivity contracts? If yes, what proportion of your sales revenue would come from exclusivity contracts?

[REDACTED]

- (c) How frequently are sales contracts renegotiated?

[REDACTED]

- (d) How frequently are price reviews conducted between contracts?

[REDACTED]

- (e) Do you provide opportunities for price reviews for customers within contracts? If yes, provide a description of the process and an explanation of the circumstances that might lead to a price review

[REDACTED]

- (f) Do changes in your costs to make and sell enable you to review prices for customers within contracts?

[REDACTED]

- (g) Provide a list of the customers under contract during the investigation period and copies of the two largest contracts in terms of sales revenue. Provide a complete translation of the documents.

[REDACTED]

12. Provide copies of any price lists for the goods used in the domestic market during the investigation period. If you do not use price lists, describe the transparency of your prices in the domestic market.

[REDACTED]

13. How do you differentiate pricing for different products/models of the goods in the domestic market? Describe how your products are grouped for price differentiation and the methodology used. Describe any cost to make or selling cost differences between differentiated products. Describe how these cost differences (if any) influence pricing decisions. Provide copies of internal documents which support your claims in response to this question.

[REDACTED]

[REDACTED]

14. Do you tier or segment your domestic customers for the goods in terms of pricing? If yes, provide:

[REDACTED]

- (a) a general description of how this is done;
- (b) list the factors that influence pricing differentiation in different tiers or segments; and
- (c) explain how cost to make and selling costs are considered in making pricing decisions for different tiers or segments.

Provide copies of internal documents which support your claims in response to this question.

15. Do you sell the goods to related entities in the domestic market? If yes, describe how prices are set for related party transactions and specify what proportion of your sales in terms of sales revenue are to related party entities. If available, provide a copy of any internal document relevant to establishing pricing to related parties.

[REDACTED]

[REDACTED]

I-4 Marketing and sales support in the domestic market

1. How does your company market the goods in the domestic market? Include in your response the value proposition used (e.g., competitive price, superior quality, reliability, availability, etc.).

Pricing always the main marketing factor. Quality, reliability and availability minor factors

2. Does your company conduct brand segmentation in the domestic market for the goods? If yes, describe the brand segmentation used and provide the proportion of sales revenue derived from each brand segment.

[REDACTED]

3. Provide examples of your domestic advertising of the goods over the past five years. If you have not used advertising provide examples of any other promotion campaigns for the goods you have conducted over the investigation period.

Limited advertising or campaigns.

On the ground sales representatives maintain contact with customers and take orders

4. How many people are in your domestic market sales team and where are they located? In general terms, how are they remunerated? If they are offered performance pay based on sales, describe the performance indicators used to establish the performance pay. Provide copies of internal documents which support your claims in response to this question.

[REDACTED]

5. Describe what parameters are provided to sales staff to assist in establishing pricing for the goods when negotiating sales with customers. Provide copies of internal documents which support your claims in response to this question.

[REDACTED]

EXPORTER'S DECLARATION

I hereby declare that. *PMB Aluminium Sdn Bhd.* and *Press Metal Berhad* have completed the attached questionnaire and, having made due inquiry, certify that the information contained in this submission is complete and correct to the best of my knowledge and belief.

Name *Geoffrey Cantelo*



Signature

Position in Company *Advisor*

Date *22 October 2021*