



2 December 2022

The Director - Investigations 3  
Anti-Dumping Commission  
GPO Box 2013  
Canberra ACT 2601

### **Circumvention inquiry into concrete underlay film from Malaysia**

Dear Director,

This submission is made on behalf of LCM General Products Pty Ltd, trading as Cromford Film ("Cromford"), to the current circumvention inquiry into concrete underlay film exported from Malaysia. The submission presents Cromford's views in response to the Commission's Statement of Essential Facts Report No. 606.

Cromford welcomes the Commission's finding that a circumvention activity occurred, in the form of slight modification of the subject goods. Whilst not unexpected, the lack of cooperation from relevant importers is disappointing. It is appropriate in these circumstances to consider the importers' unwillingness to respond to Cromford's claims or the Commission's request for information, as an admission that they sought to circumvent the existing measures by importing modified goods.

As noted in its submission to the inquiry, Cromford supports the decision to alter the description of the goods to include film of a width ranging from 1 to 7 metres. This properly addresses Cromford's concerns of future circumvention, whilst ensuring that legitimate non-competing imported films of widths less than 1 metre, are not unnecessarily captured by the measures.

Finally, Cromford also supports the Commission's decision to recommend retrospective date of effect of the altered notice, given that circumvention appears to have commenced shortly after imposition of the measures, and appears to have continued during the course of the inquiry. As expected, the retrospective altered notice would only affect those importers that continued to import the circumvented goods following the initiation of the Commission's inquiry.

**PUBLIC VERSION**

In conclusion, the Commission's recommendation and the Minister for Industry's expected decision is likely to result in a stronger expanded Australian manufacturing industry.

Yours Sincerely,

A handwritten signature in blue ink, appearing to read 'Austen Ramage'.

Austen Ramage  
General Manager  
Cromford Film Pty Ltd