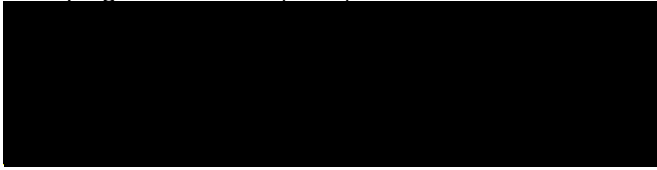




Conference Summary

Reconsideration No. 155A – Aluminium Extrusions exported from Malaysia and Vietnam

Panel Member	Jaclyne Fisher OAM
Review type	Reconsideration
Date	13 March 2026
Participants	Anti-Dumping Commission (ADC):  Press Metal Aluminium (Australia) Pty Ltd (PMAA): <ul style="list-style-type: none">• Andrew Korbel, Corrs Chambers Westgarth• Andrew Percival, Percival Legal• Paul Ingram, PMAA Capral Limited (Capral): <ul style="list-style-type: none">• Luke Hawkins, Capral Limited• Chad Uphill, Trade Advisory
Time opened	11:00am AEDT
Time closed	11:47am AEDT

Summary

The Anti-Dumping Review Panel (Review Panel) opened the conference with an Acknowledgment of Country.

The purpose of this conference was to obtain further information in relation to the reconsideration before the Review Panel in relation to Aluminium Extrusions (the goods) exported from Malaysia and Vietnam.

The conference was held pursuant to section 269ZZHA of the Customs Act 1901 (the Act).

In the course of the conference, I was able to ask the participants to clarify any argument, claim or specific detail contained in REP 591 in relation to Capral Limited (Capral's) application. The conference was not a formal hearing of the review, and was not an opportunity for parties to argue their case before me.

In accordance with section 269ZZHA(2), in making a recommendation under subsection 269ZZK(1), I may have regard to:

- (a) further information provided at this conference to the extent that it relates to “relevant information” within the meaning of section 269ZZK(6) of the Act;



(b) any conclusions reached at this conference based on “that relevant information”.

At the time of the conference, I advised the participants:

- That the conference was being recorded and transcribed by Microsoft Teams (as facilitated by the Review Panel’s Secretariat), and that the recording would capture everything said during the conference.
- That the conference was being recorded for the Review Panel to have regard to when preparing a conference summary. The conference summary would then be published on the Review Panel’s website.
- Any confidential information discussed during the conference would be redacted from the conference summary prior to publication.

Prior to the conference, participants were provided with a copy of the Review Panel’s Privacy Statement. The Privacy Statement outlines who the conference recording and transcript may be disclosed to. The Privacy Statement is available on the Review Panel’s website [here](#). The participants indicated that they understood the Privacy Statement and consented to:

- The recording of the conference; and
- The recording being dealt with as set out in the Privacy Statement.

Further information requested

The specific information that the Review Panel sought at this conference is set out below.

Background:

As ordered by the Federal Court of Australia on 20 November 2025, after the ADC has provided its report on normal value and dumping margin according to law (orders 3 and 4 refer), the Review Panel must prepare a report under s 269ZZK of the Act in response to Capral’s application for review dated 12 July 2022 (order 5 refers). This normal value and dumping margin report is relevant to the Review Panel’s consideration of material injury in Review Panel Report No. 155 and its recommendations to the Minister.

On 2 March 2026, Corrs Chambers Westgarth (Corrs) wrote to the Review Panel on behalf of PMAA regarding Reconsideration 155A:

- Referring to the public notice issued on 23 February 2026;



- Noting the ADC's provision of the report to PMAA on 23 February 2026;
- Indicating that upon PMAA's review, it considers an additional adjustment (pursuant to s 269TAC(8) of the Act) should have been made to the normal value established under s 269TAC(1) of the Act. It proposes that this adjustment is required to address the timing difference between when the orders were placed and when the invoices were issued for such export sales of aluminium extrusions during the inquiry period to ensure that a proper comparison can occur between the normal value and export price so that they are not impacted by sales occurring at different times.
- Proposing that the Review Panel should assess the need for such an adjustment and suggesting a conference be held to outline this information with the ADC.

For the purposes of obtaining further information about this issue, the Review Panel has convened this conference between PMAA and the ADC. The Review Panel invited Capral as an observer to the conference.

All parties were reminded that if referring to confidential information it would need to advise the Review Panel so that Capral could withdraw from the conference if necessary for such discussions.

The Review Panel's purpose is to obtain further information about this issue, including information relevant to whether the timing adjustment is an issue that the ADC was required to have regard to in preparing its report on normal value and dumping margin as ordered by the Federal Court on 20 November 2025.

The Review Panel member advised, for transparency purposes, that she constituted the Review Panel for Duty Assessment DA00243 (Review Panel Report 167) which is referred to by PMAA in Attachment A.

Further information:

The same further information request has been advised to PMAA and the ADC.

In advance of the conference, PMAA provided to the Review Panel a written response which it would read out at the conference. This information was suitable to be placed on the public record and attached to the conference summary.

The Review Panel advised PMAA, through the Secretariat, that it would need to provide exact references to any material referred to in its response at conference. A copy of its response would be provided to the ADC.



Information Request No 1: In relation to CON 591, did PMBA (or PMAA) provide evidence in its REQ, submissions or during the verification visit, to the ADC that there was a substantial difference in the placement of orders and the issuing of the export sale invoices (referred to as a timing difference) and accordingly propose that an adjustment to deal with comparison of the normal value and export price needed to have made to the normal value to deal with this difference?

(a) PMAA read out its full response (see attachment A). It refers to emails between PMAA's representative and the ADC in December 2021 at which time PMAA provided additional information relating to the purchase order dates of the export sales from PMB to PMAA. These emails were shown to participants via 'screen share' during the conference. This was following the verification visit. PMAA (Paul Ingram) attended the verification visit and was able to provide information as to the timing adjustment issue discussion from that visit if required.

PMAA indicated that the verification visit report and the Statement of Essential Facts No. 591 were published at similar times. Neither made reference to the timing adjustment issue.

PMAA's did not make any submissions on the timing adjustment issue as its focus turned to dealing with the level of trade issue in Continuation inquiry No 591.

(b) ADC indicated that the current team with responsibility for the remittal were not the team who dealt with Continuation Report 591. To address the Review Panel's information request it had undertaken a review of all the documents in its case records of 591 and advised the following (which is also to be supplied in writing for attachment to this conference summary):

There was no reference in the PMBA's response to the request for exporter information questionnaire (REQ) in relation to the need for a timing adjustment or a different approach to 'date of sale' (in both the export sales and the domestic sales section). Spreadsheets (sales information) provided as part of the REQ included information on domestic sales and this indicated that the date of sale was shown as the invoice date. With respect to the export sales spreadsheet, this also showed that the invoice date was shown as the date of sale.

In the exporter verification documentation for PMBA, including the confidential work program, there was no reference to the issue of a different date of sale or a timing adjustment being required. There was a record of a revised export sales listing being provided post-verification which included a column containing purchase order dates for



each export sale. There was also no reference to or record of information being provided for domestic sales regarding the purchase order date for domestic sales that could be compared to the export sales for the normal value purposes.

No correspondence was located in the verification team records regarding any concerns raised by PMBA with the verification report in relation to the date of sale of export and domestic sales or the need to make a timing adjustment.

The ADC also reviewed the correspondence and submissions and could not locate any correspondence in relation to consideration of the date of sale or the need for an adjustment in relation to timing.

Information Request No 2: Following the Court orders, did PMBA (or PMAA) provide in its RFI or in any of its submissions to the ADC, that a timing adjustment was required to ensure that the normal value was correct?

(a) **PMAA** *in addition to its written response, referred to its view that it considered the responsibility rests with the ADC to calculate the normal value according to law, that is, pursuant to s 269TAC(1) of the Act with appropriate adjustments under s 269TAC(8) of the Act. It considered given the timing adjustment for the normal value found in Review Panel Report 167, which included some crossover with the inquiry period for Continuation inquiry 591, it had expected the ADC's approach to be align with that adopted in the above-mentioned Review Panel Report.*

PMAA referred to the fact that the ADC did not provide the updated draft normal value calculations to PMAA to check these calculations. Accordingly, it did not have the opportunity to address the timing adjustment issue prior to the report being provided to the Review Panel.

(b) **ADC** *considered it had followed the Court Orders in relation to the preparation and provision of the report to the Review Panel. It issued a Request for Further Information (RFI) to PMBA which was developed with specific reference to the additional documents that were requested from PMBA in Review of Measures 640, and the request was limited to the information needed to consider the level of trade claim made in Continuation Inquiry 591. PMBA provided a response as well as some additional information beyond what was requested in the RFI. All information provided by PMBA was in relation to level of trade and addressed in the commission's report to the ADRP. The ADC indicated that PMAA had not made reference to the need to undertake additional adjustments to the normal value other than what was contained in the Court Orders and had noted in correspondence that*



(Confidential correspondence between the ADC and PMAA). The ADC stated there was no information or supporting evidence provided by PMAA in relation to the need for a different date of sale or an additional adjustment to the normal value.

The ADC confirmed that it had not provided a copy of the updated normal value calculations to PMAA prior to providing its report to the Review Panel.

The draft conference summary will be provided within one working day and it is required that participants provide any comments identifying if there is any confidential information that requires redaction or any comment on accuracy.

Information to be provided following the conference includes:

1. PMAA to provide the exact references to documents it referred to in the conference and also the email correspondence it screen-shared during the conference (ensuring any confidential information is appropriately identified).
2. The ADC to provide a copy of its summary of the information surveyed and outlined to the Review Panel at conference in relation to its assessment of the timing adjustment issue from Continuation 591 and the remittal report.

Attachment A: Written response from PMAA to conference information request

Attachment B: PMAA provided supporting documents with exact referencing information.

Attachment C: Written response from the ADC to conference information request, including additional information with the exact referencing information.



ADRP Review No. 155A – Review of Minister’s Decision in Continuation Inquiry 591

Information to be provided by PMAA at Conference on 13 March 2026

The Review Panel has requested that, at the conference scheduled for 13 March 2026, PMAA and the ADC address the two information requests set out below.

To assist the Review Panel, PMAA has reduced its responses to those questions to writing:

1. *In relation to CON 591, did PMBA (or PMAA) provide evidence in its REQ, submissions*

or during the verification visit, to the ADC that there was a substantial difference in the placement of orders and the issuing of the export sale invoices (referred to as a timing difference) and accordingly propose that an adjustment to deal with comparison of the normal value and export price needed to have made to the normal value to deal with this difference?

Yes, PMBA provided evidence of that to the ADC during the verification process in CON 591, having raised with the ADC, during the verification process, the potential need for an adjustment.

During verification, PMBA’s representatives raised with the ADC’s representatives their concern that there was a significant difference between order date and invoice date for export sales that did not also apply to domestic sales, and that an adjustment might be required as a result.

The period of investigation was entirely during the COVID-19 pandemic. During this time PMBA’s experience was that there was a significantly longer period, for exports than for domestic sales, between the placement of orders (and therefore the setting of prices) and the issue to customers of invoices and delivery of product. This arose because factory shutdowns and supply chain disruptions during the pandemic had a disproportionate impact on delivery of product to (among other destinations) Australia, and invoicing of those products.

As a result, when a domestic sale invoiced on a particular date is compared to an export sale invoiced on the same date, it is frequently the case that the price for the export sale was set much earlier than the price for the domestic sale, and by reference to different input prices.

In particular, there were material movements in aluminium ingot prices, as measured by the London Metal Exchange (**LME**) index, which account for approximately 70% of the cost to make aluminium extrusion products. LME aluminium prices increased over the period of investigation from USD 1587.27 to USD 2504.11.

After PMBA raised the issue in verification, the ADC requested further information and documents from PMBA, as to purchase dates and copies of purchase orders. PMBA provided that information to the ADC on 21 and 22 December 2021.

According to the information and evidence provided to the ADC, during the period of investigation:

- the average number of days between purchase order date and invoice date for domestic sales was 13 days, and
- the average number of days between purchase order date and invoice date for export sales was 87 days



2. **Following the Court orders, did PMBA (or PMAA) provide in its RFI or in any of its submissions to the ADC, that a timing adjustment was required to ensure that the normal value was properly comparable with the export price?**

No, PMBA and PMAA did not do so. Candidly, they did not see the need to do so because:

- they expected that the dumping margin calculated by the ADC, once it allowed a level of trade adjustment, would be negative or *de minimis*; and
- they expected that the ADC's approach to the invoice and purchase order dates would be consistent with the approach that the ADRP had required the ADC take in ADRP 167. That was a review of the ADC's decision in dumping duty assessment DA0243. That assessment related to goods exported to Australia by PMBA in the period 27 June 2021 to 26 December 2021. That period overlaps with, and then immediately follows, the period of investigation to which CON 591, and ADRP 155A, relate (namely 1 July 2020 to 30 June 2021).

Unfortunately, contrary to its usual practice, the ADC did not provide PMAA and PMBA with a draft of its dumping margin calculations for review and comment prior to providing those calculations to the ADRP with its report. Had the ADC done so, PMAA would have reminded the ADC of the need to make an adjustment to address the 'timing' issue, as it is apparent from the face of those calculations that such an adjustment is required.

At any rate, PMAA understands that the Court Orders required the normal value and dumping margin determinations for PMBA's exports be made by the ADC according to law. Pursuant to the *Anti-Dumping Agreement* and the *Customs Act 1901* (Cth) (**Act**), it is the obligation of the ADC as investigating authority to ensure a fair comparison is made where it is aware of any differences affecting price comparability. This is emphasised in WTO jurisprudence.

That obligation is imposed on the ADC such that where the data itself establishes that there exists a difference affecting price comparability, an adjustment must be made: refer ss 269TAC(8) and 269TACB(1) of the Act as well as decisions of the WTO Panel in *Egypt – Steel Rebar* (WT/DS211/R) (8 August 2002) para. 7.352, and Appellate Body in *United States – Hot Rolled Steel from Japan* (WT/DS184/AB/R) (24 July 2001).

In *Egypt – Steel Rebar* (WT/DS211/R) (8 August 2002) the WTO Panel relevantly said, at para. 7.352:

“7.352 To the contrary, we read Article 2.4 as explicitly requiring a fact-based, case-by-case analysis of differences that affect price comparability. [Text omitted] ... Finally, we note the affirmative information-gathering burden on the investigating authority in this context, that it “shall indicate to the parties in question *what information is necessary* to ensure a fair comparison and shall not impose an unreasonable burden of proof on those parties” (emphasis added). In short, where it is demonstrated by one or another party in a particular case, or **by the data itself that a given difference affects price comparability**, an adjustment must be made. In identifying to the parties the data that it considers would be necessary to make such a demonstration, the investigating authority is not to impose an unreasonable burden of proof on the parties. Thus, the process of determining what kind or types of adjustments need to be made to one or both sides of the dumping margin equation to ensure a fair comparison, is something of a dialogue between interested parties and the investigating authority, and must be done on a case-by-case basis, grounded in factual evidence. “ (bold added)

ADRP Review No. 155A – Review of Minister’s Decision in Continuation Inquiry 591**Supporting documents provided by PMAA following ADRP Conference on 13 March 2026**

Note: This document is not confidential, however the files referred to at items 1, 4, 5, 6 and 7 below are confidential.

In response to the information requests made by the Review Panel at the conference held on 13 March 2026, PMAA has uploaded to the Review Panel’s file sharing platform (Sigbox) the following files in connection with Continuation Inquiry 591:

1. spreadsheet entitled “**A B D & F sales sources ADC-SR 20-21**”;
2. image of email exchange on 20 and 21 December 2021 between Geoff Cantelo and [REDACTED]
3. image of email exchange on 22 December 2021 between Geoff Cantelo and [REDACTED]
4. spreadsheet entitled “**22 Dec 2021 update PO dates & numbers and PMB invoice dates GP6-Z B-2**”;
5. spreadsheet entitled “**591 - ADRP JR - Confidential Attachment 7 - PMBA - Dumping Margin**”;
6. spreadsheet entitled “**Press Metal Update Dumping Margin 591 - ADRP JR - Confidential Attach 7**”;
7. submission by PMBA and PMAA to the ADC dated 7 April 2022 (with Confidential Attachment B).

A brief explanation of what each of those files contains is set out below:

1. Spreadsheet entitled “**A B D & F sales sources ADC-SR 20-21**”

This spreadsheet was provided by PMBA to the ADC (by upload to its file sharing platform) on 22 October 2021 as an exhibit to PMBA’s response to the ADC’s exporter questionnaire.

In the workbook tab named “All”, the purchase order dates (for both export sales and domestic sales) are listed at column J, while invoice dates are listed in column F. Similarly in other tabs in the workbook such as in the tab named “Local”, at column J the date of the purchase order for each domestic sale is recorded.

When the ADC suggested, in the conference of 13 March 2026, that the purchase order dates for domestic sales had had not been provided to it in Continuation Inquiry 591, it must have overlooked this information or document.

2. Image of email exchange on 20 and 21 December 2021 between PMBA’s representative, Geoff Cantelo, and [REDACTED] of the ADC (with some emails copied to others) with subject line in the final email “**purchase order date B-2 update column headings & Century**”. This image was shared on screen during the conference of 13 March 2026.
3. Image of email exchange on 22 December 2021 between PMBA’s representative, Geoff Cantelo, and [REDACTED] of the ADC, with subject line “**Uploaded 22 Dec B-2 update PO dates & numbers and PMB invoice dates**”. This image was shared on screen during the conference of 13 March 2026.
4. Spreadsheet entitled “**22 Dec 2021 update PO dates & numbers and PMB invoice dates GP6-Z B-2**”

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This spreadsheet was provided by PMBA to the ADC (by upload to its file sharing platform) on 22 December 2021, during the ADC's exporter verification process. It is the spreadsheet referred to in the email imaged at item 3 above, and contains the additional information regarding purchase orders for export sales that had been requested in the verification process. That is, this spreadsheet has been updated with the purchase order dates in the workbook referred to in item 1 above.

It includes the following information in "tab 1A - 19 Dec 2021 B-2" for each export sale from PMBA to PMAA (through the intermediary, PMB):

- column BO: the purchase order number;
- column BL: the date of the purchase order; and
- column BQ: the date of the invoice issued to PMAA for the purchase.

As PMAA noted in the Conference, in March 2022 PMBA was provided with a draft of the Exporter Verification Report in Continuation Inquiry 591. That report was then published, also in March 2022, and a day later the Statement of Essential Facts (**SEF**) was published.

PMBA and PMAA made two submissions concerning the dumping margin calculations contained in the Exporter Verification Report and the SEF, but those submissions were focussed on the fact that the ADC had not made a level of trade adjustment. The confidential version of the first of those submissions, dated 7 April 2022 (with Confidential Attachment B to it), has been uploaded with this note. The second submission, dated 2 May 2022, is available [here](#) on the ADC's public file.

A further submission was made in ADRP 155, on 15 September 2022, by PMAA's adviser, GTR Consulting (Kevin Reilly). That submission records the concerns that PMBA and PMAA had with the absence of a level of trade adjustment, and the impact that was expected to the dumping margin if that adjustment was corrected. PMAA invites the Review Panel to refer again to that submission to ADRP 155 if further context is desired on that issue. It is available [here](#) on the ADRP's public file.

5. Spreadsheet entitled "**591 - ADRP JR - Confidential Attachment 7 - PMBA - Dumping Margin**"

This spreadsheet is confidential attachment 7 to the ADC's report dated 20 February 2026, titled "*Report to the Anti-Dumping Review Panel in accordance with Federal Court orders dated 20 November 2025 remitting the matter to the Anti-Dumping Commission (Order NSD67/2024: Press Metal Aluminium (Australia) Pty Ltd & Anor v Minister for Industry & Innovation & Or)*". It records the calculation of the dumping margin for PMBA which was undertaken by the ADC for the purpose of the current process.

In this workbook PMBA's export sales are detailed in "Tab (b) Dumping Margin 1". In that tab, purchase order dates for those export sales are recorded at column CG, and invoice dates at column R.

6. Spreadsheet entitled "**Press Metal Update Dumping Margin 591 - ADRP JR - Confidential Attach 7**"

This is the same spreadsheet as item 5 above, except in this version PMAA has, for the purposes of demonstration, re-calculated the dumping margin for PMBA if export order dates, rather than invoice dates, are compared with domestic sales dates.

In "Tab (a) NV Summary", two new surrogates have been made and shown in red in cells B11 and D15. This was necessary because moving from invoice dates to purchase order dates means that some of the sales that were previously in the period of investigation (**POI**) are now

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outside it (e.g. if an order was placed before the POI, but invoiced during the POI). PMAA has sought to replicate the ADC's methodology to creating surrogates in this tab.

In "Tab (b) Dumping Margin 1", new columns CN, CO, CP, CQ and CR have been added, which use export order dates (in column CG) instead of export invoice dates (in column R) for the calculation. In column CR, PMAA has added a filter for sales which are within the POI, or outside of it (for the reason described above). Once "yes" is filtered for in column CR using the "In the POI Yes / No" filter, a negative dumping margin of - 0.1420% is shown in cell CQ2.

In "Tab (c) PMBA Dumping margin 2" there is a table of the new dumping margins calculated by PMAA, using this method, for each MCC.

PMAA reiterates its view expressed in the Conference that an adjustment is required by law to take account of the "timing" issue due to its effect on the comparison of prices in the dumping margin determination. It arises on the date before the ADC, and was necessary to ensure a fair comparison.

17 March 2026



Australian Government
Department of Industry,
Science and Resources

Anti-Dumping Commission

ADRP 2026/155A – Aluminium extrusions from Malaysia and Vietnam

ADRP Conference Friday 13 March 2025

Written responses to Panel Member's request for further information on 10 March 2026¹

Information Request No 1

1. In relation to CON 591, did PMBA (or PMAA) provide evidence in its REQ, submissions or during the verification visit, to the ADC that there was a substantial difference in the placement of orders and the issuing of the export sale invoices (referred to as a timing difference) and accordingly propose that an adjustment to deal with comparison of the normal value and export price needed to have made to the normal value to deal with this difference?

Commission's written response to Information Request No 1

1. The commission reviewed the case record for Continuation Inquiry 591. It did not identify any evidence in the REQ, submissions, verification documents or other correspondence that claimed that there was a substantial difference in the timing of the placement of orders and the issuing of the export sales invoices (relative to domestic sales invoices). The commission did not identify any evidence or submissions proposing that a timing adjustment be made to deal with a difference.
2. The commission reviewed the following documents:
 - a. PMBA's confidential response to exporter questionnaire (REQ) (including spreadsheets attached to the REQ).
 - b. Exporter verification records (including the work program, verification report and email correspondence before, during and after verification).²
 - c. PMAA confidential response to importer questionnaire (RIQ).
 - d. Submissions in response to the verification report.
 - e. Submissions in response to the Statement of Essential Facts.
3. The commission reviewed the relevant sections of the REQ where the need for a consideration of differences in the timing of the sales or 'a timing adjustment' would usually be noted and observed the following:
 - a. In section B.1 Australian export sales process, question 9, on page 12, PMBA states that the date of sale for export sales is the invoice date because '[a]ll material contract terms exist by then'.

¹ Written responses provided on 18 March 2026 (after conference).

² This was a COVID era virtual verification, so the correspondence between the commission and PMBA was also ongoing during verification.

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- b. In section D-1 Domestic sales process, question 8, on page 19, PMBA states that the date of sale for domestic sales is the invoice date, stating '[n]o claim for any different date'.
 - c. In section E-5, question 1, page 26, PMBA responds to a question about 'any other adjustments required to ensure fair comparison between export price and normal value' without mentioning the need for a timing adjustment.
4. In its export and domestic sales listing attached to the REQ, PMBA entered the 'date of sale' as the 'invoice date' for all export and domestic sales transactions listed. The commission refers to the following tabs in the Excel workbook '591 - PMBA & PMB - REQ Spreadsheets - Confidential 221021' submitted in response to the REQ where 'invoice date' is identified as the date of sale:
 - a. D-2 Domestic sales (columns M&N)
 - b. B-2 Australian Sales (columns L&M)
5. The commission notes that during the exporter verification process, PMBA provided an updated Australian sales listing which included a column (column CF) containing purchase order dates for export sales. The commission has reviewed the correspondence and records that relate to the provision of this additional information and note the following:
 - a. The additional purchase order date information was sent with email correspondence that seeks to clarify the shipping terms (INCO terms) applicable for the related party transactions between PMBA, PMB and PMAA (Appendix 1, Item 4³).
 - b. The calculation of export price used in 591 contains an annotation that notes that shipping terms changed from a specified purchase order date. (Appendix 1, Item 13⁴).
 - c. The work program notes that the purchase order dates for export sales were verified (page 47).
6. The commission has no record of the purchase order dates for domestic sales being provided, discussed or verified. Purchase order dates for domestic sales, as well as purchase order dates for export sales, would usually be provided by the exporter in the REQ or requested by the commission in response to a claim made by an exporter that the date of sale is the purchase order date and therefore, the date that the export sales and domestic sales should be compared to ensure a proper comparison between export price and normal value. The usual approach to making an adjustment for 'sales at different times' is outlined in section 15.3 on page 51-52 of the Dumping and Subsidy Manual.
7. Following the preparation of the draft exporter verification report for continuation inquiry 591, the commission provided PMBA with a copy of the report and requested PMBA to identify any inaccuracies in the calculations. The issues raised by PMBA in response to the draft verification report did not include any concerns related to the date of sale or the need to make a timing adjustment.

³ Reference is made to verification email dated 22 December 2021 subject line: "Uploaded 22 Dec B-2 update PO dates numbers and PMB invoice dates."

⁴ Reference is made to Confidential Attachment 4, Cell W5 of worksheet "(a) Export sales"

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8. The commission has reviewed all submissions made by PMBA and PMAA in 591 and has not found any submissions related to sales at different times, date of sale or the need for a timing adjustment.

ADRP Request 2

2. Following the Court orders, did PMBA (or PMAA) provide in its RFI or in any of its submissions to the ADC, that a timing adjustment was required to ensure that the normal value was properly comparable with the export price?

Commission's written response to Information Request No 2

9. The commission did not receive any correspondence, evidence or submissions following the orders made by the Federal Court on 19 November 2025 related to a claim that a timing adjustment should be made to the normal value or that a different date of sale should be used when calculating export price and normal value to ensure a fair comparison between the two when calculating the dumping margin.
10. In accordance with the Court Orders including paragraph 4 and note A, the commission's request for information (RFI) issued to PMBA on 1 December 2025 only sought information from PMBA needed to assess whether a level of trade adjustment should be made and, if needed, to make the level of trade adjustment.
11. The commission also notes that:
 - a. In its response to the RFI provided to the commission on 5 January 2026, [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED].⁵ The commission considered PMBA's position, accepted it and did not seek any further information.
 - b. In its response to the RFI, PMBA provided an additional report to the commission that was not specifically requested by the commission in the RFI. The commission considered this submission in detail in the report provided to the ADRP.
12. In accordance with paragraph 4 (b) of the Court Orders, the commission prepared the report on the normal value and dumping margin and provided its report to the ADRP on Friday 20 February 2026 and provided a copy to PMBA and published a non-confidential on the electronic version on Monday 23 February 2026.
13. The commission confirms that it did not provide PMBA with a copy of the normal value and dumping margin calculations prior to providing its report to the ADRP on 20 February 2026.

⁵ Confidential Attachment 2 to the Commission's Report to the Anti-Dumping Review Panel in accordance with Federal Court Orders dated 20 February 2025, page 4, paragraph (v)(a).

Information provided following the conference

14. Following the conference, the commission retrieved archived emails that were exchanged between PMBA's consultant and the ADC verification leader after the exporter verification in December 2021. Some emails related to the revised Australian (export) sales list containing the purchase order dates of export sale provided by PMBA for the verification. These emails do not show that the purchase order dates for export sales were provided by PMBA to support a claim related to the timing of sales, date of sale or the need to make a timing adjustment.
15. Copies of key correspondence and documents provided in 591 as listed in Appendix A have been provided directly to the ADRP Secretariat.
16. On 17 March 2026, the ADRP Secretariat provided the commission with a copy of the further information provided to the ADRP by PMBA on 17 March 2026. The commission reviewed the case record again and identified a document referred to in item 1 of PMBA's note titled '**A B D & F sales sources ADC-SR 20-21**' in PMBA's REQ attachments file. This document had not been identified in the commission's review of the case record prior to the conference on 13 March 2026. The commission confirms that in the worksheets labelled 'All', 'PMAA', 'Local' and 'Others' there is a column labelled 'sales order date'.
17. The commission notes that this file is not referenced in PMBA's REQ (written response), REQ spreadsheets (including Tab B-2 Australian Sales, Tab B-2.2 Australian Sales Source, Tab D-2 Domestic Sales, and Tab D-2.2 Domestic Sales Source) or verification records (including verification correspondence, work program and the verification report). The file itself does not contain any information to indicate it has been provided for the purpose of demonstrating a timing difference as noted in question 1. This file is included in Item 2 of Appendix A.

Appendix A

591 - Key correspondence/documents provided by PMBA/PMAA		
Questionnaire responses		
1.	PMBA confidential response to exporter questionnaire (REQ) dated 22 October 2021 (word component)	Confidential
2.	Excel worksheets that form part of PMBA's confidential response to the exporter questionnaire (REQ) dated 22 October 2021	Confidential
2a	591 – ALEX – PMBA_PMB – REQ Bundle 1 (Pre-verification) – 22Oct21	Confidential
2b	591 – ALEX – PMBA_PMB – REQ Bundle 2 (Pre-verification) – 22Oct21	Confidential
2c	Excel worksheets that form part of PMBAs confidential response to the REQ dated 22 October 2021 (included in REQ Bundle 1)	Confidential
2d	A B D & F sales sources ADC-SR 20-21 (included in REQ Bundle 1)	Confidential
3.	PMAA confidential response to Part A of the importer questionnaire dated 22 September 2021	Confidential
Verification documents		
4.	Email correspondence in December 2021 between PMBA/PMAA and commission re verification of export sales including revised export sales listing with purchase order dates	Confidential
4a	Subject: 'Further questions' dated 15 December 2021	Confidential
4b	Subject: 'GP6-E [entity] & GP6-A [entity] Further questions' dated 15 December 2021	Confidential
4c	Subject: 'GP6-Z B-2 16 Dec 2021 uploaded to Sigbox' dated 16 December 2021	Confidential
4d	Subject: 'Answers in red GP6-Z B-2 16 Dec 2021 uploaded to Sigbox' dated 20 December 2021	Confidential
4e	Subject: 'purchase order date B-2 update column headings & [entity]' dated 21 December 2021	Confidential
4f	Subject: 'Uploaded 22 Dec B-2 update PO dates & numbers and PMB invoice date' dated 22 December 2021'	Confidential

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5.	Email correspondence in March 2022 between PMBA and commission re draft Exporter Verification Report	Confidential
5a	Subject 'RE: 591 PMBA comments in red A1 ocean freight A2 [entity] B Malaysia inland transport PMBA/PMB draft verification report' dated 17 March 2022	Confidential
5b	Subject 'RE: Press Metal - Draft Verification Report – Response' dated 17 March 2022, 1.11PM	Confidential
5c	Subject 'FW: Press Metal - Draft Verification Report – Response' dated 17 March 2022, 6.45PM	Confidential
6.	PMAA Importer Verification Report published 15 March 2022 (EPR 591 no. 20)	Non-Confidential
7.	PMBA Exporter Verification Report published 17 March 2022 (EPR 591 no. 23)	Non-Confidential
8.	PMBA - Exporter Verification Work Program	Confidential
PMBA/PMAA Submissions		
9.	Press Metal submission to ADC Continuation Inquiry 591 dated 18 March 2022 (Non-confidential version - EPR 591, no 24)	Confidential
10.	Press Metal submission to ADC Continuation Inquiry 591 dated 7 April 2022 (Non-confidential version - ERP 591, no 29)	Confidential
11.	Press Metal submission to ADC Continuation Inquiry 591 dated 7 April 2022 (ERP 591, no 31)	Non-confidential
12.	Press Metal submission to ADC dated 2 May 2022 (Non-confidential version - EPR 591, no 33)	Confidential
13.	Press Metal Supplementary submission on SEF dated 3 May 2022 (Non-confidential version - EPR 591, no 34)	Confidential
Confidential Attachments to Report 591		
14.	Confidential Attachment 3 PMBA Export Price	Confidential
15.	Confidential Attachment 4 PMBA CTMS	Confidential