

23 January 2026

By email

ADRP@industry.gov.au

Non-Confidential

Ms Jaclyne Fisher OAM
Panel Member
Anti-Dumping Review Panel
10 Binara Street
Canberra ACT 2601

Dear Ms Fisher

ADRP Review 175 – Exports of Certain Aluminium Extrusions from China - Review of Minister’s Decision in Continuation Inquiry 657 – Request for Reinvestigation

Together with Percival Legal, we act for Press Metal Aluminium (Australia) Pty Ltd (**PMAA**). We are instructed by PMAA to write this letter on its behalf in connection with ADRP Review 175.

We note your request of 19 January 2026 to the Anti-Dumping Commissioner (**Commissioner**) to reinvestigate certain findings in Continuation Inquiry 657 concerning Goomax Metal Co., Ltd, and to report to you on that reinvestigation by 20 March 2026. PMAA understands that, as a result of that request, you will now report to the Minister in ADRP Review 175, including in connection with the application for review made by PMAA, within 30 days of receipt by you of the Commissioner’s reinvestigation report.

Given that development, PMAA respectfully submits that the Review Panel should also request the Commissioner to reinvestigate whether the ‘fabricated products’ which are central to PMAA’s application for review are ‘like goods’ to those exported to Australia by Press Metal International Ltd (**PMI**).

As you know, and as outlined again below, PMAA and PMI have contended in the context of Continuation Inquiry 657, and PMAA has contended again in ADRP Review 175, that those ‘fabricated products’ are not ‘like goods’.

In its response to the exporter questionnaire (**REQ**) in Continuation Inquiry 657, PMI advised the Anti-Dumping Commission (**ADC**) that it considered ‘fabricated products’ not to be ‘like goods’ to those exported to Australia. For that reason information concerning the costs of production of those products was not included in the REQ.¹

PMI also identified ‘fabricated products’ as not being ‘like goods’ in its response to a deficiency report issued by the ADC. That response was provided to the ADC (in two parts) on 4 and 12 March 2025, months before the ADC provided to PMI and published its preliminary variable factors assessment for PMI, and more than four months before the publication of the ADC’s Statement of Essential Facts.

¹ Confidential “657 PMI EQ workbook.xlsx”, Tab D-2 Domestic sales, Column BI – categorization ‘NL’ that is, ‘Not Like’, as opposed to ‘L’ being ‘Like’, and Category Codes L and NL in tab 1 – PMI MCCs

Apparently without making an assessment of that contention the ADC included the 'fabricated products' in its determination of PMI's normal value and dumping margin determination, specifically, as falling within MCC NA-6A-T1-1.² However, the 'fabricated products' possessed characteristics additional to the four characteristics governing the classification of aluminium extrusion products to MCC NA-6A-T1-1. Those additional characteristics distinguished the 'fabricated products' from other products classified to MCC NA-6A-T1-1 by reference to production processes, production costs, applications and prices.

Accordingly, as has been contended for again by PMAA in Review 175, the 'fabricated products' should have been determined not to be 'like goods', and should therefore have been excluded from the determination of variable factors for PMI. Failing that they should have been classified to a separate MCC specific to such fabricated products.

PMI having raised the issue, it was incumbent on the ADC to investigate whether those 'fabricated products' were 'like goods' before including them in the normal value and dumping determination for PMI. If the ADC disagreed with PMI's contention that the 'fabricated products' were not 'like goods' to those exported to Australia, that disagreement and the reasons for it should have been communicated to PMI. Had it done so, this would also have provided PMI and PMAA with the opportunity to address any concerns or questions that the ADC may have had on the issue.

That did not occur, and nor has it been specifically addressed to date either by the Review Panel or the ADC in the conduct of Review 175. Given that it was a matter specifically identified in PMAA's Application for Review, the Review Panel has jurisdiction to consider the issue.

To address this deficiency, and given the time now available, PMAA respectfully submits that the Review Panel should request the Commissioner to investigate whether the 'fabricated products' produced by PMI are 'like goods' to those exported to Australia. That will involve an assessment of whether the characteristics the 'fabricated products' possess are identical to or, if not, closely resemble the characteristics of the aluminium extrusion products exported to Australia. PMAA (and PMI) will, if requested, make available to the ADC any further information sought about the 'fabricated products' in any such reinvestigation, as they would have done had issues been raised earlier by the ADC.

The timeframe for that reinvestigation could be the same as for the other reinvestigation already requested of the Commissioner.

If you have any questions about this submission, please do not hesitate to contact me.

Yours faithfully



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² Anti-Dumping Commission Report REP 657 - Confidential attachment 15 - PMI - Dumping margin"