For Publication

30 October 2026

The Director - Investigations 3
Australian Trade Remedies Commission
GPO Box 2013
Canberra ACT 2601
investigations3@artc.gov.au

Dear Director

Supplementary Submission - Inquiry into the Continuation of Anti-Dumping Measures on Certain Concrete Underlay Film Exported to Australia from Malaysia - SEF 696

We act for Davmar Industries Pty Ltd (**Davmar**) and refer to our previous submission dated 14 October 2026 (**Previous Submission**). The defined terms used in the Previous Submission are used here. We request that the Commission consider this brief supplementary submission in light of matters raised in the submissions of Cromford and Great Cosmo provided subsequent to Davmar's Prior Submission.

1. Cromford's Submission

1.1 Whilst Davmar is under no obligation to explain to Cromford the reasons for any delay in its involvement in the Commission's inquiry, we wish to note that, despite Davmar's participation and co-operation in the original investigation by the Commission, the Minister decided to impose dumping margins. Since that time, Davmar has expended significant time, effort and resources to accommodate the existing margins. Upon learning of the current application to continue the dumping measures, Davmar did not understand, and indeed expected, that the dumping margins, if continued, would be in the same order. Only after reading the SEF and observing that the Commission proposed to increase the margins by such a significant extent did Davmar resolve to prepare the Prior Submission, as the extent of the proposed increase is likely to be fatal to Davmar's business.

1.2 The suggestion in Cromford's submission dated 20 October 2026 that Davmar's failure to complete an importer questionnaire is due to involvement in circumvention activities is baseless and should be disregarded.

1.3 Contrary to paragraph 1.7 of Great Cosmo's submission dated 16 October 2026, Great Cosmo is not the only genuine producer of concrete underlay film in Malayasia. Davmar imports concrete underlay film from [**PRODUCER**] and Mr Martyn Williams, a Director of Davmar, attended [**PRODUCER**]'s factory in [**CITY**], Malaysia in October 2026 and witnessed the production of concrete underlay film first-hand.

1.4 In paragraph 8.1 of Great Cosmo's submission dated 16 October 2026, it states that "*it is simply incorrect and untrue that Cromford imports a significant proportion of its concrete underlay film form GCI. GCI has had no transactions with Cromford*". Similarly, at page 5 of Cromford's submission dated 20 October 2026, it states that "*Cromford does not import concrete underlay film for resale, directly or indirectly, from GCI or any other supplier*".

1.5 To clarify the submission made at paragraph 6.3(a) of the Previous Submission, the Commission ought to pay regard to the following facts:

(a) 'Cromford', 'Cromford Products', 'Cromford Film', 'Cromford Recycling' and 'Cromford Sheet' are business names owned by Kantfield Pty Ltd (**Kantfield**);[1]

(b) 'Cromford', 'Cromford Film', 'Cromford Recycling', 'Cromford Products', 'Cromford Pipe' and 'Cromford Sheet' are trade marks owned by Kantfield;[2]

(c) Kantfield is also the owner of business names 'Martogg & Company' and "Martogg & Co';

(d) LCM General Products Pty Ltd (**LCM**), which trades as 'Cromford Film', is not recorded as the owner of any business names;

(e) by reason of (a) and (d) above, it can be inferred that there is an arrangement or understanding by which Kantfield licences or permits the 'Cromford Film' business name to be used by LCM;

(f) LCM and Kantfield have the same registered office, two common directors, two common secretaries and the same ultimate holding company;

(g) Rogers Constructions Supplies received a price sheet from ABL Distribution Pty Ltd (**ABL**) which priced '*200UMX4000MMX50M BLACK BUILDERS FILM C/F 2M/4M RECYCLED MATERIAL*' at $[**PRICE**] per roll (excluding GST). A copy of the price sheet is **Confidential Annexure 1**;

(h) it was reported to a Sales Representative in Davmar's Brisbane office that the price for builders film listed on ABL's price sheet was low because that product was imported; and

(i) the ABL Safety Data Sheet (**Confidential Annexure 2**) confirms that the builders film listed on ABL's price sheet was sourced from LCM, and the Safety Data Sheet is "*approved by Martogg".*

1.6 Davmar suspects that Kantfield, or one of its related entities, is an importer of concrete underlay film from Great Cosmo, but the difficulty which Davmar faces in demonstrating that fact through objective evidence is that Davmar does not have access to the information necessary to conduct this investigation itself.

1.7 As such, Davmar urges the Commission to investigate whether Cromford, via Kantfield or its related entities or under the 'Martogg' business name, imports concrete underlay film from Malaysia. Davmar invites the Commission to take up Cromford's offer, at paragraph 6 of its recent submission, "*to assist with any verification the Commissioner considers necessary*".

[1] Australian Business Register, https://abr.business.gov.au/ABN/View?abn=68006073418.
[2] IP Australia, https://search.ipaustralia.gov.au/trademarks/search/result?s=81b77c4a-08a2-41f2-a20f-ece4bed8257c#_1833677.

Yours sincerely



Zac Chami, Partner
+61 2 9353 4744
zchami@claytonutz.com

George Pasas, Special Counsel
+61 2 9353 5620
gpasas@claytonutz.com

Our ref 11276/20182