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

By email: investigations3@adcommission.gov.au

Continuation Inquiry No. 696: certain concrete underlay film exported to Australia from Malaysia

Response to the supplementary submission of Davmar Industries Pty Ltd

Dear Director,

This submission is made by LCM General Products Pty Ltd, trading as Cromford Film (Cromford), the applicant for the continuation of the anti-dumping measures. It responds briefly to the supplementary submission of Davmar Industries Pty Ltd (Davmar) dated 30 October 2026.

Cromford does not import the goods

Davmar first claimed that Cromford imports film from Great Cosmo Industries Sdn Bhd (GCI) and resells it. GCI has since told the Commission that it has had no transactions with Cromford, and Cromford has confirmed that it imports no concrete underlay film for resale from any source. Davmar does not dispute either statement. It now says only that it suspects a related company, Kantfield Pty Ltd (Kantfield), of importing from GCI, and it accepts that it cannot show this with objective evidence. A claim of fact has shrunk to a suspicion about a different company.

The corporate links Davmar describes, being a shared office, common directors and the ownership of the Cromford and Martogg names, are ordinary features of a group. They say nothing about where film comes from. Cromford confirms that neither LCM, Kantfield nor any related company imports concrete underlay film from Malaysia or anywhere else, directly or indirectly, under the Martogg name or any other.

Davmar's own evidence points the other way. It relies on a distributor's price sheet, a second-hand remark that the distributor's film was cheap because it was imported, and the distributor's safety data sheet. That safety data sheet, on Davmar's own account, shows the film was sourced from LCM. Film sourced from LCM is film LCM makes. The SEF finds that the like goods were wholly manufactured in Australia by Cromford, and the Commission inspected the Pendle Hill plant in August 2025. An unnamed person's comment, passed on to one of Davmar's sales staff, cannot outweigh Davmar's own document or a verified finding.

Davmar says it lacks the information to investigate the point itself. The Commission has the verified information from GCI naming each Australian customer, and the ABF import database names every importer. A search of both for Kantfield, Martogg or any other company related to LCM would settle the matter.

Davmar's decision not to take part

Davmar says it owes Cromford no explanation for staying out of the inquiry, and then gives one. It knew of the application, expected the margins to stay about the same, and decided to engage only after reading the SEF. That answers two of the questions Cromford asked. Davmar knew of the inquiry and chose to wait for the result. It still does not say whether it received an importer questionnaire, or why it did not return one.

Its expectation had no basis. The initiation notice said the Commissioner would examine whether the variable factors had changed, and Cromford asked for a new export price for uncooperative exporters on 16 September 2026, before the SEF was published. A change in rates was in issue from the start.

Davmar calls baseless a suggestion that it stayed out because of circumvention. Cromford made no such allegation. It asked whether Davmar's choice not to cooperate reflects an unwillingness to disclose imports that may have circumvented the measures. That question remains unanswered. Davmar still has not provided its 2025 imports by product and supplier, yet it asks the Commission to investigate Cromford on a suspicion it admits it cannot support.

Davmar adds that it buys from a Malaysian producer it will not name, and that one of its directors visited that producer's factory in October 2026. Apart from GCI, no Malaysian exporter completed a questionnaire. Davmar's supplier is therefore one of the exporters that chose not to cooperate, even though its relationship with Davmar was close enough for a factory visit.

The higher rate that Davmar says may be fatal to its business follows from that choice. The SEF proposes 16.7% for GCI, slightly below its current rate, and 63.6% for all other exporters. The increase falls only on exporters that gave the Commission nothing.

Yours faithfully

John Bracic

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