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To: Puan Gayatri Kumaraveloo
Director
Multilateral Policy & Negotiation Division,
Ministry of Investment, Trade and Industry (MITI)

Attn: Puan Mardiana Mohd. Yusof
Principal Assistant Director
Trade Practices Section,
Multilateral Policy & Negotiation Division,
Ministry of Investment, Trade and Industry (MITI)

15 August 2026

COMMENTS ON THE INITIATION OF ANTI-DUMPING INVESTIGATION (PETITION NUMBER AD01/26)

Sir / Mdm,

We are submitting this letter of comment on behalf of Pui Nam Cheong Industries Sdn. Bhd. (31200-A) in response to the notice of initiation regarding the anti-dumping investigation into products of [Flat rolled product of other alloy steel and non-alloy steel, plated or coated with Aluminium and Zinc, originating or exported from The People's Republic of China, Chinese Taipei and The Socialist Republic of Viet Nam].

While we appreciate the government's mandate to ensure fair trade practices within the domestic market, we formally submit our opposition to the petition and the imposition of any proposed trade remedies.

Our opposition towards this is mainly due to the following concerns regarding the dynamics of the domestic market and the standing of the Petitioner:

1. ***Potential monopolisation and disruption***: The imposition of anti-dumping duties in this instance would disproportionately restrict supply, severely limiting choices for domestic downstream manufacturers, industries and consumers. The imposition of corrective measures also risks giving the Petitioner market dominance. The result would be directly opposite of leveling the playing field because such duties would insulate a single entity from legitimate competition, creating a monopolistic environment detrimental to the broader Malaysian economy;

2. ***Conflict of Interest***: The commercial structure and market position of the Petitioner present a clear conflict of interest. Corrective measures sought as relief appears intended not to remedy unfair trade practices, but rather as a move to eliminate market competition and secure exclusive market dominance. It should be emphasized that trade remedies exist to restore fair market conditions – ***not*** to act as an instrument for market consolidation.

To ensure that any decision aligns with the statutory requirement to evaluate overall public interest in this matter, we respectfully request that MITI expands or includes the assessment of:

1. Whether there exists any potential adverse economic impacts on downstream industries and end-users from reduced supply and inflated prices;

2. Whether the Petitioner possesses market power that would be anti-competitive and further enhanced by the imposition of trade remedies.

Thank you for your time and consideration of these views.

Respectfully,



Michael Pui
Director
Pui Nam Cheong Industries Sdn. Bhd.
Kuching, Sarawak,
Malaysia.