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September 10, 2014

Ms Andrea Stone

Manager – Anti-Dumping Commission

Customs House

Constitution Avenue

Canberra Act 2600

Dear Andrea

Re Anti-Dumping Investigation No. 238 – Certain deep drawn stainless steel sinks exported from China. Submission by importer.

We understand that forming part of the criteria for determining if certain stainless steel sinks have been sold at dumped prices to Australian importers is the comparison between the price a manufacturer sells stainless steel sinks into their local Chinese market compared to the sell price to the importer.

Our supplier [REDACTED] (name of supplier/sink manufacturer) does not sell sinks in the Chinese domestic market that remotely resemble the ones we import. They sell only through their own stores with no wholesaler involved. The sinks are aimed at the high end of the market.

Below are some noteworthy points:

- The sinks that our supplier sells in the Chinese market are vastly different to the ones we import.

- The sinks for local Chinese sale are only sold through their own stores. No wholesaler is involved so prices quoted would be retail which cannot be compared to ex factory or FOB prices for exports.
- The sinks for local sale are up-market with many accessories including stainless steel tray, detergent dispenser, stainless steel wire draining basket, plastic colander and set of knives and knife holder. The sale price includes these accessories.
- The bowls have very small radius corners from R10 up to R25.
- Because of the design and up-market status, the sinks for local market are made from heavy gauge stainless steel from 1.0 to 1.2.
- The production costs for these sinks must include a write-off for the sink moulds.

Given the considerable differences between the sinks produced for the local Chinese market by our supplier and those exported, we suggest that the Commission should not compare the two for the purpose of the investigation.

We also ask the Commission to take into consideration that the fact that we own our sink moulds. The factory manufactures to our requirements using our moulds . We do not import sinks that the factory produces that form part of their own line of sinks they offer. In effect, the price they charge us is for the supply of materials and the processing costs of making of the sinks plus packaging.

Regards

Ann Kerr

General Manager