#### IN THE AUSTRALIAN ANTI-DUMPING COMMISSION

# CERTAIN DEEP DRAWN STAINLESS STEEL SINKS EXPORTED FROM THE PEOPLE'S REPUBLIC OF CHINA

The Goods

TASMAN SINKWARE PTY LTD

**Australian industry** 

# SUBMISSION OF THE AUSTRALIAN INDUSTRY IN RESPONSE TO ISSUES PAPER 2014/03 -GOODS AND LIKE GOODS

Date of Document: 2 December 2014

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The Australian Industry Group

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**MELBOURNE VIC 3004** 

\_\_\_\_\_

This submission is made on behalf of the Australian industry producing certain deep drawn stainless steel sinks in Australia, specifically the applicant to *Dumping and Countervailing Investigation ADC 238*, Tasman Sinkware Pty Ltd.

The Australian Industry makes this submission in response to *Issues Paper 2014/03 - Goods and Like Goods* (**Issues Paper**) published on behalf of the Australian Anti-dumping Commission (**Commission**). The responses below follow the paragraph numbering in the Issues Paper.

#### 3.3 Individually-imported lipped laundry tubs

The Australian industry supports the Commission's assessment [3.3.2] that 'individually-imported lipped laundry tubs' are covered by the goods description. This is the correct view given the definition of the goods, *inter alia*:

"... deep drawn stainless steel sinks with a single deep drawn bowl having a volume of between 7 and 70 litres (inclusive), or multiple drawn bowls having a combined volume of between 12 and 70 litres (inclusive), with or without integrated drain boards, whether

finished or unfinished, regardless of type of finish, gauge, or grade of stainless steel and whether or not including accessories."

- Refer ADN No. 2014/20 (18 March 2014)

#### Possible Ministerial Exemption for individually-imported lipped laundry tubs

At the outset, the Australian industry feels compelled to correct the record in relation to an incorrect assumption expressed by the Commission on this issue:

"There is no suggestion in Tasman's submissions that its current production of laundry tubs can be installed atop free-standing laundry cabinets to made laundry units in the same way as lipped tubs are" – Issues paper, p. 7

For the avoidance of doubt, it is entirely possible for the Australian produced like goods to be installed atop free-standing laundry cabinets, designed to accommodate the Australian industry's laundry tubs. A free-standing laundry cabinet is designed around the deep drawn stainless steel sink that it intends to accommodate. It is important to acknowledge that lipped tubs are not exclusive to free-standing laundry cabinets. *Image 1*, below, illustrates the use of a laundry tub (as distinct from a so-called lipped tub) atop a free-standing laundry cabinet.





Image 1: LBC 600dr - 590mm Laundry Cabinet marketed as "Pre-assembled and nicely packed in box" sold by HBQ Investments Pty Ltd t/a 'BathroomLaundryKitchen.com' of Canning Vale, Western Australia.

Further examples of free standing laundry cabinets designed for laundry tubs (not being lipped tubs), and offered for sale in Australia form NON-CONFIDENTIAL ATTACHMENTS A, B, C and D.

The Australian industry is gravely concerned that the Commission has been led to believe that so-called 'free-standing laundry cabinets' are only compatible with 'lipped tubs'. On the above evidence, this view is incorrect. To the extent that such a conclusion affects the Commission's

recommendation to the Parliamentary Secretary on the issue of whether or not to make a ministerial exemption, the Australian industry would consider it an error of fact.

In response to the Commission's request for additional information to benefit it in making a determination as to whether lipped tubs should be subject to a ministerial exemption, the Australian industry submits the following responses to the Commission's request for information.

"whether laundry tub bowls produced by Tasman are directly substitutable for imported lipped tubs by being physically able to be installed on top of laundry cabinets to make free-standing unit..."

Firstly, it is important to recite the Australian industry's earlier submission in relation to the meaning of "like of directly competitive goods" as applied under paragraphs 8(7)(a) and 10(8)(a) of the *Customs Tariff (Anti-Dumping Act) 1975* (**the Dumping Duty Act**). In its response to the submission of Everhard Industries Pty Ltd dated 30 September 2014) the Australian industry submitted that:

"...reference to "like or directly competitive goods" in the *Dumping Duty Act*, should not be interpreted any differently to the term "like goods" under the Part XVB of the Customs Act." [Tasman response to Everhard Industries, 30 September 2014, pp. 10-11]

Therefore, it is immaterial as to whether the Australian produced like goods (so-called laundry tub bowls) are "directly substitutable for imported lipped tubs by being physically able to be installed on top of laundry cabinets to make free-standing laundry units" [emphasis added to Issues Paper, p. 8]. This is because according to section 2.3 of the Dumping Manual, where the goods under consideration (GUC) and the 'like goods' are not alike in all respects (i.e. 'directly substitutable'), the Commission will assess whether they have characteristics closely resembling each other against a number of considerations.

Image 2, below, illustrates a laundry tub bowl (as produced by the Australian industry) fitted on top of a laundry cabinet to make a free-standing laundry unit. Image 3, below, illustrates a lipped tub (the GUC) also fitted on top of a laundry cabinet to make a free-standing laundry unit.



Image 2: A laundry tub bowl fitted on top of a laundry cabinet (Dimensions: 590mm (W) x 580mm(D) x 880mm(H)) (Source: ATTACHMENT D)



Image 3: A lipped tub fitted on top of a laundry cabinet (Dimensions: 560 mm (W) x 560 mm (D) x 880 mm(H)) (Source: NON-CONFIDENTIAL ATTACHMENT E)

"whether imported lipped laundry tubs are directly substitutable for laundry tub bowls produced by Tasman by being physically able to be installed into a fixed bench top (and whether any modifications are required for this installation)"

*Image 4*, below, illustrates a lipped stainless steel sink installed into a fixed bench top. *Image 5*, below, illustrates a laundry tub installed into a fixed bench top.



Image 4: Lipped stainless steel sink installed into a fixed bench top (Blanco Attika model)



Image 5: A laundry tub bowl installed into a fixed bench top

"If modifications are required to allow for the above substitutability, the extent and viability of these (including commercial considerations)"

#### (a) Installation "on top of laundry cabinets"

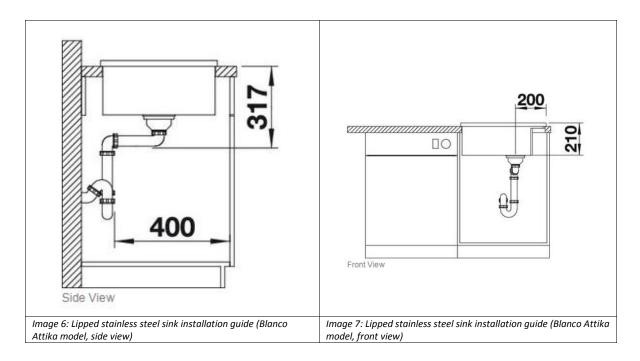
To the extent that the Commission has drawn a distinction between "laundry cabinets to make free-standing laundry units" and "fixed bench top[s]", it is observed from *images 2* and 3, above, laundry tub bowls and lipped laundry tubs may be installed on-top of 'laundry cabinets'.

No modifications are required to the laundry tub bowls or the lipped laundry tubs in order to install them on top of the laundry cabinet pictured in *image 2*, above. As this investigations relates to deep drawn stainless steel sinks (the goods), and not the so-called, laundry cabinets, it is not a relevant enquiry for the Commission to consider whether modifications are required to a sub-set of laundry cabinets, i.e. those pictured in *image 3*, above.

This is also then consistent with the treatment and consideration of the Commission in relation to kitchen sinks where a range of installation methods such as top mount or inset, undermount and flushmount exist and have different treatment depending on the type of benchtop surface (granite, composite stone or laminate) into which the kitchen sink is installed. The room and application of the sink (i.e. kitchen versus laundry) should not determine a separate classification of the goods where they are both installed for the common purpose of the collection and distribution of waste water.

#### (b) Installation "into a fixed bench top"

As *images 4 & 5*, above, illustrate no modifications are required to laundry tub bowls or lipped laundry tubs in order to install them into a fixed bench top. This is further supported by the following installation illustrations of a lipped laundry tub, images 6 & 7, below. The Australian industry advises that its installation method is exactly the same as that for the lipped laundry tub illustrated, as the same plumbing fixings are required to install any sink, and are not specific to a particular style or design of sink. In all cases, installation would need to comply with the ABCB (Australian Building Codes Board) PCA (Plumbing Code of Australia).



#### "in what circumstances the above substitutions may occur"

The substitutions may occur for aesthetic reasons, the desire to install a lipped sink into a fixed bench top gives the installation a contemporary post-industrial look.

The substitution may also occur due to the proprietary design of the particular laundry cabinet in use.

In terms of free-standing laundry cabinets, space constraints or size of installation, installation method or material applied for installation are not circumstances giving rise to substitution, as the laundry cabinets may be manufactured to fit any space or situation. The only issue becomes the volume of the laundry tub bowl or lipped tub to be accommodated within it.

"Whether, when considered as a whole, installed lipped laundry tubs atop of cabinets (i.e. free-standing laundry units) compete with completed installed laundry tub bowls installed in fixed bench tops, and the factors of competition between them"

At the outset, the question set by the Commission is based on the inaccurate premise that laundry tub bowls cannot be installed atop of cabinets to create fee-standing laundry units. This error of fact is dismissed by *image 1*, above. In other words, completed laundry tub bowls installed atop of cabinets compete with installed lipped laundry tubs atop of cabinets, as both create the so-called free-standing laundry units.

Separately, laundry tub bowls installed in fixed bench tops, compete with lipped laundry bowls installed in fixed bench tops, refer to *images 4 & 5*, above.

Although the Australian industry queries the relevance of the Commission's question, namely the "factors of competition between [laundry cabinets and fixed bench tops]" - which are irrelevant considerations in this investigation concerning deep drawn stainless steel sinks - the Australian industry nevertheless submits that the factors of competition between the two styles of cabinet, are economic, and the consideration becomes one of the cost of engaging a cabinet maker to produce a fixed bench top to accommodate a lipped laundry tub or laundry tub bowl, compared to the cost of a do-it-yourself (DIY) renovator, or plumber, placing a laundry cabinet in a utility space (and then, if the former, engaging a plumber to install the lipped laundry tub or laundry tub bowl atop of the laundry cabinet), and then to plumb the waste fittings to the waste water connection (assuming that taps/water inlets, have already been installed).

#### 3.4 Free-standing laundry units that include a lipped laundry tub

The Australian industry is concerned with the Commission's analysis of the meaning of 'accessories'. In support of its application, the Australian industry included a non-exhaustive list of accessories. This non-exhaustive list was adopted by the Commission's acceptance of the definition of the GUC in the initiating public notice:

"Deep drawn stainless steel sinks are covered by the scope of the investigation whether or not they are <u>sold in conjunction with accessories such as mounting clips, fasteners, seals,</u> <u>sound-deadening pads, faucets (whether attached or unattached), strainers, strainer</u> <u>sets, rinsing baskets, bottom grids, or other accessories</u>". [emphasis added]

> - Public Notice, Initiation of an Investigation into Alleged Dumping and Subsidisation, The Australian, 18 March 2014

Given that the Australian industry identified a non-exhaustive list of examples in support of its definition of accessories, it is not open to the Commission to dismiss the Australian industry's definition and substitute it with its own, based on a narrower interpretation of the class of goods that may constitute accessories.

The class of accessories the Australian industry anticipated when it defined the goods the subject of the application, extended beyond the scope of the Commission's so-called, 'true accessories'. Therefore, the Commission's attempt to narrow the scope of the goods on its view of the "genuine sense of the term 'accessory'", constitutes an interpretive error, and places the Commission in the invidious position of requiring industry applicants to exhaustively define and describe such items which may or may not be included with the primary goods the intended subject of the dumping duty notice.

Even if, the Commission's internet based definition of 'accessory' is accepted<sup>1</sup>, then the Australian industry fails to see how the Commission can in turn rely on this definition to conclude that a laundry cabinet is not an accessory, given that it is primarily "added to [the lipped laundry tub]... in order to make it more useful, versatile or attractive". As identified above (images 4 & 6 illustrates) lipped tubs may be installed into so-called 'fixed bench tops'. When packaged as an accessory, the laundry cabinet, improves the product offering of the lipped laundry tub, just as the inclusion of tapware, basket waste (plugs) do also. If not supplied as part of the kit, then the enduser will need to acquire them some other way. In summary, a laundry cabinet when supplied with a lipped laundry tub, simply improves the value proposition of the supplier to the consumer of the primary goods, namely the 'lipped laundry tub', being a deep drawn stainless steel sink. The end-user cannot avoid the need for a 'laundry cabinet' or 'fixed bench top', as deep drawn stainless steel sinks all need some method of installation and are incapable of defying gravity.

Therefore, the Australian industry submits that the Commission would be wrong to attempt to redefine the goods following initiation of the application. For the avoidance of doubt, the accessories which may or may not be included with the deep drawn stainless steel sinks, include, but are not limited to (to address those identified by the Commission), "accessories that are related to…":

- "...food preparation";
- "water supply (e.g. taps)";
- "pipes";
- "chopping boards";
- "colanders";
- "bowl protectors";
- "utility trays"; and
- "drainer baskets".

It is no argument for the Commission to assert (as it does in the Issues Paper), that a "lipped laundry tub... [is] of no (or very limited) use without these [laundry] cabinets", is no different to arguing that a laundry tub bowl is of any greater use without a laundry cabinet or fixed bench top. Neither product is of any use or functionality without the accessories, that may be offered with them, or must be separately acquired to ensure it is installed into a support structure to make it capable of collecting and holding water and distributing the waste water.

<sup>&</sup>lt;sup>1</sup> http://www.oxforddictionaries.com/definition/english/accessory?searchDictCode=all

#### 3.5 Cleaner's sinks and hand wash basins

The Australian industry welcomes the assessment of the Commission that cleaner's sinks and hand wash basins do constitute the goods under consideration. The Australian industry reminds the Commission that hand wash basins with a volume of less than 7 litres, do not constitute the goods.

In response to the Commission's request for further information, the Australian industry advises as follows:

"whether there are any functions that are specific to cleaner's sinks and wash basins that are not able to be performed by the sinks produced by the Australian industry, and whether the sinks produced by Tasman can be directly substitutable for these producers with or without any product modifications (and if modifications are needed, what sort of financial or operational implications may result)"

The Australian industry understands that cleaner's sinks and hand wash basins ( $\geq$  7 litres) constitute deep drawn stainless steel sinks with a number of accessories, including but not limited to a wall mounting bracket.

"whether there are common physical characteristics that may be used to identify cleaner's sinks and/or wash basins, the types of accessories that tend to be sold alongside these sinks (addressing any physical characteristics that are required in the sink to accommodate these accessories)"

Again, the Australian industry understands that the key physical characteristic to identify the cleaner's sinks and/or wash basins is the wall mounting bracket that allows the deep drawn stainless steel sink to be free-standing, unaided by cabinets or fixed bench-tops.

"what are the commercial similarities/differences (if any) between cleaner's sinks and hand wash basins and sinks produced by the Australian industry (including distribution channels)"

The Australian industry is capable of supplying into any distribution network responsible for the supply of sink and sink-related products.

#### 3.6 Tight corner radius sinks

The Australian industry agrees with the following assessments made by the Commission in relation to so-called "tight corner radius sinks", namely that:

- deep drawn stainless steel sinks produced by the Australian industry are 'like goods' to deep drawn stainless steel sinks with a tight corner radius;
- there is substantial production likeness, being made between the like goods produced by the Australian industry and the tight corner style imported goods;
- there is market and commercial 'overlap' between the like goods produced by the Australian industry and the tight corner style imported goods; and
- the like goods produced by the Australian industry are "like or directly compete" within the meaning under paragraphs 8(7)(a) and 10(8)(a) of the *Dumping Duty Act*.

At the outset, the Australian industry repeats its earlier submission that the production process of a deep drawn stainless steel sink with a tight radius has only two additional steps:

- annealing after first (cold) drawing/pressing; and
- second (soft) drawing/pressing,

in all other respects, the same materials are used, and all other steps in the manufacturing process are identical. The critical step of drawing/pressing the shape of the goods remains the same. Further, for the record, the Australian Industry **does** undertake second (soft) drawing/pressing as part of its existing manufacturing process for bowl production. While this process is not done for specifically for the production of tight radius bowls it is undertaken to ensure a higher standard of quality is achieved in the bowl draw process. Therefore, the only point of difference in the manufacturing process is the annealing step between the first and second drawing/pressing operations for the bowls. Subject to anti-dumping measures being imposed to address the material injury caused by dumping to the Australian industry, it is entirely possible for the Australian industry to produce tight radius bowls through investment in new tooling capabilities, allowing a two stage drawing process but without the requirement of an annealing process to heat and cool the bowls.

It is important to note that the product 'continuum' proposed by the Commission is not so much driven by product offering, but marketing and value perceptions. There is a marketing 'continuum', whereby certain brands are marketed as 'top-tier, high price', but these are not necessarily determined by the product design. With particular reference to deep drawn stainless steel sinks with a tight corner radius, the following examples demonstrate that they are just as capable of competing at the 'entry-level' to the market as they are at the 'top-tiers' of the market, all based on price. Therefore, it is not open for the Commission to conclude that tight radius sinks are incapable of directly competing with the Australian industry's like goods. Attached are examples of tight corner radius sinks sold into the entry-level market, NON-CONFIDENTIAL ATTACHMENT F, NON-CONFIDENTIAL ATTACHMENT G, CONFIDENTIAL ATTACHMENT H and

<u>CONFIDENTIAL ATTACHMENT I</u>. In other words, tight corner radius sinks compete with the Australian produced like goods on price, even in the entry-level market segment.

In the top-tier segment of the Australian market, the Australian industry competes with tight corner radius sinks, in terms of price, design and marketing with its Australian produced Nu-petite range (refer NON-CONFIDENTIAL ATTACHMENT J).

Finally, the Australian industry submits that it is not open to the Commission to recommend the Minister make an exemption under the *Dumping Duty Act*, where the Australian industry is found to produce like goods to the goods under consideration. The Australian industry repeats its submission dated 30 September 2014, where it analysed the antecedent legislation to the *Customs Act*, from which the term "like or directly competitive goods" was derived, an extract which is reproduced below:

"Specifically, the expression "like or directly competitive goods" was adopted by the *Dumping Duty Act* from the *Customs Tariff (Dumping and Subsidies) Act 1961* - being the Act that it later repealed. Reference to the antecedent Act suggests that "like or directly competitive goods" had the same meaning as the term "like goods" does under the current provisions of Part XVB of the Customs Act. Support for this interpretation may be found in the section 269TG (Customs Act) equivalent provisions found in the now repealed Act of 1961:

"7(1) If the Minister, after inquiry and report by the Tariff Board, is satisfied, as to any goods, that –

"the export price of any of those goods that have been exported to Australia is less than the normal value of the goods so exported; and

"the exportation of those goods is causing or threatening injury to an **Australian industry producing or manufacturing like or directly competitive goods...** may cause a notice to be published in the Gazette specifying the goods as to which he is so satisfied." [emphasis added]

"In other words, reference to "like or directly competitive goods" in the *Dumping Duty Act*, should not be interpreted any differently to the term "like goods" under the Part XVB of the Customs Act."

Submission of the Australian industry dated 30 September 2014

#### **Conclusions**

In summary, the Australian industry asserts that:

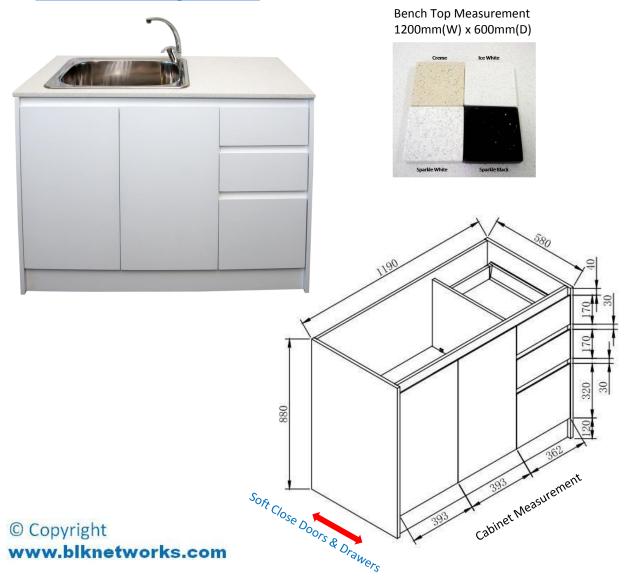
- individually-imported lipped laundry tubs are properly treated by the Commission as the goods under consideration;
- a ministerial exemption should not be granted for individually-imported lipped laundry tubs;
- free-standing laundry units that include a lipped laundry tub come within the definition of the goods under consideration;
- free-standing laundry units that include a lipped laundry tub should not be made subject to an ministerial exemption;
- cleaner's sinks and hand wash basins are essentially the goods under consideration sold with certain accessories, and such goods should not be made subject to a ministerial exemption as they directly substitutable;
- tight corner radius sinks are properly characterized by the Commission as the goods the under consideration; and
- tight corner radius sinks should not be made subject to a ministerial exemption, as the Australian industry produces like goods.

DATED	2 December 2014	
SIGNED:		
International Trade Remedies Advisor		
for the Australian industry		

Non-confidential Attachment A

# **LBC 1200dr**

**1190mm Laundry Cabinet** 









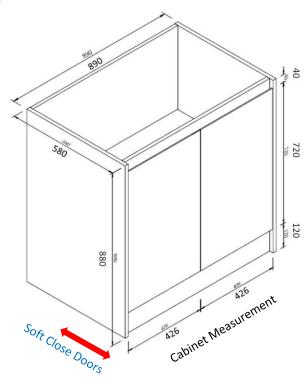
Non-confidential Attachment B

# LBC 900dr

#### 890mm Laundry Cabinet with 2 doors



Bench Top Measurement 900mm(W) x 600mm(D)



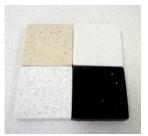






#### **Bench Top Colours**

Creme Ice White



Sparkle White Sparkle Black

# Mix & Match









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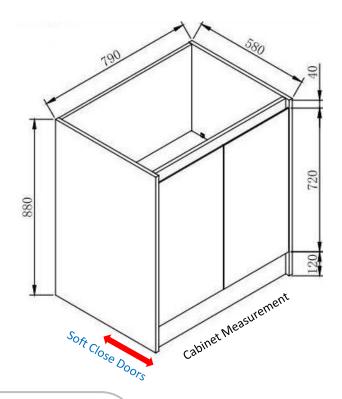
Non-confidential Attachment C

# LBC 800dr

#### 790mm Laundry Cabinet with 2 doors



Bench Top Measurement 800mm(W) x 600mm(D)



#### **Bench Top Colours**

Creme Ice White



Sparkle White Sparkle Black

# Mix & Match









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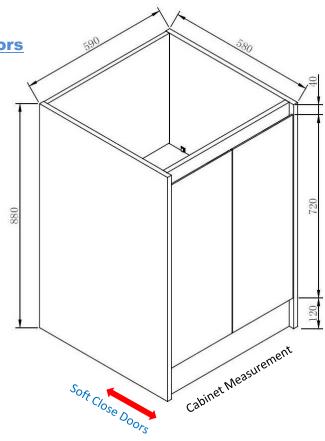
Non-confidential Attachment D

# LBC 600dr

**590mm Laundry Cabinet with 2 doors** 

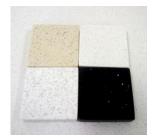


Bench Top Measurement 600mm(W) x 600mm(D)





Creme Ice White



Sparkle White Sparkle Black

# Mix & Match









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Non-confidential Attachment E

11/21/2014

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SKU #: INTC1098 📻

#### 35L Laundry Designer Boutique Tub and Foil Wrap Cabinet Intasink (View all from Intasink)







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\$416.00
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Linkware Kirra Shower Rose \$52.95



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OmniMount Furniture Cleaner and Polish \$31.95

#### **Product Details**

**Specifications** 

Product Q&A

**Shipping & Returns** 

Intasink 35L Laundry Designer Boutique Tub and Foil Wrap Cabinet

#### WEIGHTS & DIMENSIONS

- Exterior dimensions: 56 cm W x 56 cm D
- Overall dimensions: 88 cm H x 56 cm W x 56 cm D
- Overall Sink Depth Top to Bottom: 88cm
- Exterior Sink Length Side to Side: 56cm
- Exterior Sink Width Front to Back: 56cm

#### FEATURE:

FEATURES		
Product Type: Laundry Tub With Cabinet	Number of bowls: Single	
Bowl Capacity: 35 Litre	Material: Stainless Steel	
Finish / Colour: White & Cream	Tap Holes: Double	
Waste or Bypass Included: Yes	Country of Manufacture: China	

#### More From This Collection: (View All)



**45L Laundry Double Tub and Foil Wrap Cabinet** by Intasink

\$780.00



45L Laundry Designer Tub and Foil Wrap Cabinet by Intasink

\$416.00



Laundry Lifestyle Inset Trough by Intasink

\$300.00

Laundry Mini Lifestyle Trough by Intasink

#### ABOUT THE MANUFACTURER

Intasink has been offering high quality kitchen and bathroom fittings and accessories for more than ten years and have become widely recognised for high quality value for money products. Intasink offers a complete range from sinks and taps through to laundry troughs, accessories, kitchen systems, bathroomware, water filtration systems and a range of other specialised fittings.



\$280.00

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OUR SKU # INTC1098

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\$178.00



Cetona Laundry Tub Roma

Bathroom

\$521.00

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Non-confidential Attachment F

# AVOCA SINK PACKAGE

# SYN



Single over/undermount sink with chopping board and choice of drainer tray or flat tray.



plus



or



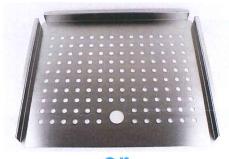
# ACTON SINK PACKAGE



Double over/undermount sink with chopping board and choice of drainer tray or flat tray.



plus



or



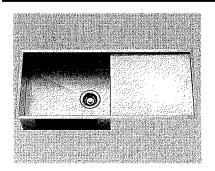


www.eaglesplumbing.com.au

Non-confidential Attachment G

# HAFILE

#### Squareline 100 - 539.97.990



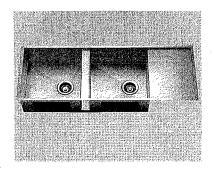
#### Pack includes:

- 1 x Single bowl sink with drainer
- 1 x Gooseneck mixer tap



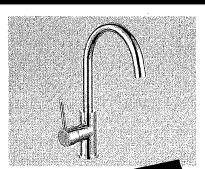
\$282\*

#### Squareline 120 - 539.97.991



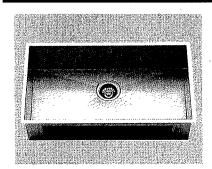
#### Pack includes:

- 1 x Double bowl sink with drainer
- 1 x Gooseneck mixer tap



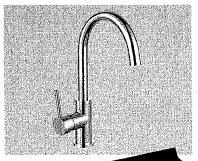


#### Squareline 78 - 539.97.992

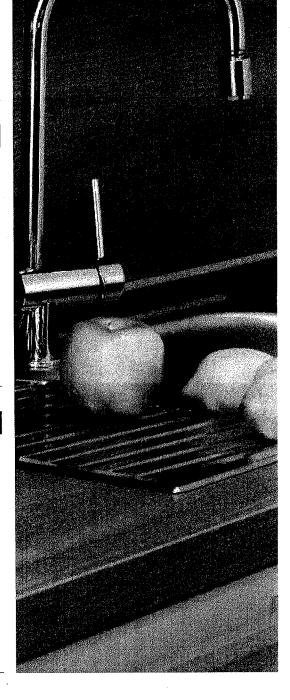


#### Pack includes:

- 1 x Single bowl
- 1 x Gooseneck mixer tap



\$262\*



<sup>\*</sup>Sink package pricing excludes GST and freight charges and are available to Häfele trade customers only.

Non-confidential Attachment J



#### **Nu-Petite®**

Beautiful and practical in every way. From apartment living to family home.



**NP611 LH Bowl** (NP612 RH Bowl) incl. AC62, AC65



**NP671 LH Bowl** (NP672 RH Bowl) incl. AC62, AC65 Shown with optional AC63 and SQ107 tap



**NP621 LH Bowl** (NP622 RH Bowl) incl. AC62, AC65



**NP663** incl. AC62, AC63, AC65

UNDERMOUNT SINKS



NP650U



**NP61U LH Bowl** (NP62U RH Bowl) incl. AC62, AC63, AC65



**NP63U** incl. AC62, AC63, AC65



**RECOMMENDED TAPWARE** 

**NP60U** incl. AC62, AC63, AC65

Additional sinks in this range available. See pages 30-31.

#### **ACCESSORIES** More accessories are available. See page 29.

















#### **FEATURES**

# **Undermount installation**Delivers a modern.

Delivers a modern, minimalist look. Ideal for solid surfaces.

#### Generous bowl capacity

Holds 30 litres in the main bowl to accommodate the biggest pots and pans.

## Custom made accessories

Transforms the sink into a streamlined food preparation area.

### Rear waste outlets

Allows the maximum amount of usable space in cupboards below.

## Solid supporting bridge

Joining the bowls this way means no weak areas are created between the bowls.

#### Australian Made

Oliveri has designed and manufactured sinks in Australia since 1948.