

25 November 2016



Submission in respect of Anti-Dumping Commission Exemption Inquiry EX0047

ANTI-DUMPING NOTICE NO. 2016/104

Deep Drawn Stainless Steel Sinks Exported to Australia from the People's Republic of China
Exemption Goods - Lipped Laundry Tubs used in the Production of Laundry Cabinets

Dear Sir or Madam

Having now seen Tasman's response we request that you please consider the following submission.

We note that Tasman has acknowledged that they do not produce identical goods (PART B – C.1). We request that it be further noted that they not only don't produce identical goods but in fact have never produced identical goods.

In regards Tasman's assertion that they produce like goods (PART D – D.1) we note that the Anti-Dumping Commission has already concluded after extensive consultation that Cabinet & Tub combinations are not like goods and as such tubs specifically made for locally made cabinets are logically also not like goods.

We do understand why Tasman may feel this could be open to abuse but do note that the exemption in question is very specific in regards design features (lipped) and these prevent the tubs from being used in applications where Tasman's products are used. We are surprised that Tasman did not seek to further strengthen protection by requesting that the Exemption be limited to Milena - who is able to prove that it has a range of matching mass-produced cabinets and produces these locally.

Tasman notes that to produce identical product they would need to invest in additional tooling (PART E – E.1). Milena makes note that the replacement value alone for our locally made cabinets (Solo, Contour, Skinny & King) is over [redacted] Million Australian Dollars not to mention the investment required in plastic injection machinery which runs into tens of Millions.

Milena notes that the Dumping Duties in question have done substantial damage to local manufacturing with volumes on our locally made cabinets down by [redacted] since the implementation. This is not volume that has been gained by Tasman but rather volume that has been lost to the fully imported cabinets & tubs which have not been subject to these dumping duties – further proof that these products are not like goods.

Milena thanks the Anti-Dumping Commission and the Minister for initiating this Exemption Inquiry and requests that, should it be granted, it be backdated to cover all Dumping Duties paid to date on these products. We can confirm that if this is done Milena will be using the money to win back the volume it has lost to the Imported products so as to insure the future of local manufacturing.

Yours sincerely,

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