



Venture DMG T/As Milena Australia  
5-11 Stephen Rd  
Dandenong Vic 3175  
Ph. 03 9212 3222  
Fax. 03 9212 3200

[jmcmanamny@ventureaustralia.com.au](mailto:jmcmanamny@ventureaustralia.com.au)

3<sup>rd</sup> September 2014

**Letter to the ADC – Public**

Ms. Andrea Stone  
Manager/Anti-Dumping Commission  
Customs House  
5 Constitution Ave  
Canberra ACT 2600

Dear Ms Stone,

**Public Record**

**Re: Anti-Dumping Investigation NO. 238 – Certain deep drawn stainless steel sinks Exported from China**

**Submission by Venture DMG T/as Milena Australia**

**Australian Importer of Laundry Stainless Steel Sinks – China – Australia**

We are aware that the point highlighted in this submission with regards to products described as lipped stand-alone stainless steel laundry units, have been raised by other parties throughout this investigation and we wish to add our information and request Venture DMG's support of this matter is documented and considered.

Milena Australia, established in 1976 has been a trusted local supplier to National Plumbing Merchants in the Laundry Category. Milena Australia is considered a low-middle range, value for money Laundry essential. Polymer Cabinets are injection moulded in two Victorian locations (Keysborough and Braeside), assembled in Dandenong and sold with either a Polymer Sink or imported Chinese Stainless Steel Sink assembled to form a stand-alone laundry unit. The stainless steel sinks are the only item Milena imports for its production – all other components are produced within Australia. Our point of difference is our commitment to a high level of local manufacturing.

## PUBLIC RECORD

Venture currently sells 17 items to National and Independent Plumbing Merchants, of which 11 contain Stainless Steel Sinks imported from China. A summary of our product split by sales value and volume is shown below.

Product Code	Description	Ave Monthly Unit Qty	% Of Our Business
CT-45MS	Laundry Lipped Sink - 45L sold as part of a stand-alone laundry unit	■	■
CT-35MS	Laundry Lipped Sink - 35L sold as part of a stand-alone laundry unit	■	■
Inset Troughs	Bench Top Tubs	■	■

**(Redacted – Sales Volume)**

Product Code	Description	Average Monthly Gross \$
CT-45MS	Laundry Lipped Sink 45L	■
CT-35MS	Laundry Lipped Sink 35L	■
Inset Troughs	Bench Top Tubs	■

**(Redacted – Sales Value)**

These figures reflect the impact the Levy will have on our local manufacturing plant. ■% **(Redacted actual figure)** of units made and sold to Merchants are Laundry Trough and Cabinets (containing Laundry lipped sinks) that equates to ■% **(Redacted actual figure)** of Gross Revenue.

The Two above mentioned Milena Product's (specifically Laundry Lipped Sinks) are shown below.



CT-35MS and CT-45MS

As per your notice **Anti-Dumping Notice No. 2014/20 Customs Act 1901- Part XVB**

*The application alleges that the goods have been exported to Australia at prices less than their normal value and were in receipt of countervailable subsidies and that the dumping and subsidisation has caused material injury to the Australian industry through:*

- *Lost sales volumes*
- *Reduced market share*
- *Price depression*
- *Price suppression*
- *Loss of profits and profitability*
- *Reduced return on investments*
- *Reduced capacity utilisation and*
- *Reduced employment numbers*

Venture DMG recommends that Lipped Laundry Troughs exported from China be excluded from the Duty and categorised as not the goods. We submit this application requesting you take action to exempt these sinks on the grounds that our Stainless Steel Trough and Polymer stand-alone cabinets on offer are in no way considered competitive to those goods offered for sale in Australia by Tasman Sinkware Pty Ltd. Tasman will not be affected by our importation of these units as we do not compete against them in any way with our Laundry Trough and Cabinets. It is a product which they are not manufacturing and selling.

Should the Levy apply we anticipate the following happening to our business:

- *Lost sales volumes*
- *Reduced market share*
- *Loss of profits and profitability*
- *Reduced return on investments*
- *Reduced capacity utilisation and*
- ***Reduced employment numbers***

This levy would have a severe negative impact on our viability as an employer in the Victorian manufacturing sector which is already under severe pressure to remain viable.

Should you require any additional information to support this submission please contact the undersigned.

Yours sincerely,



**Julie McManamny**

National Account Manager

Venture DMG T/As Milena Australia

[jmcmanamny@ventureaustralia.com.au](mailto:jmcmanamny@ventureaustralia.com.au)