



Our Ref                    WJC:LK:SHR00758/074609

Lawyers

9 September 2014

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Dear Ms Stone

**PRELIMINARY AFFIRMATIVE DETERMINATION NO. 238 REGARDING CERTAIN DEEP DRAWN STAINLESS STEEL SINKS EXPORTED FROM CHINA  
SUBMISSION ON BEHALF OF SHIRO AUSTRALIA PTY LTD**

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This submission in relation to Preliminary Affirmative Determination No. 238 is made on behalf of our clients, Shiro Australia Pty Ltd. Our concern regards the products in our client's Supertub range, marketed under the Robinhood brand.

**Distinguishing Features**

Each product in our client's Supertub range is a fully assembled standalone laundry unit. Every product in the range includes flexible water hoses, washing machine hose tap connections, side apertures for washing machine hoses, satin finish powder-coated galvanised steel cabinets and adjustable rubber feet. Various products in the range also come installed with drawer storage, cupboard storage, goose-neck taps, single lever mixer taps, two handle mixer taps, and seamless stainless steel bowls. As such, the deep drawn stainless steel sinks which are the subject of the Preliminary Affirmative Determination No. 238 are merely one of many components of our client's product.

**Everhard Report**

We are aware from the Commission's website that the Commission sought and received a questionnaire from Everhard Industries regarding its view on the proposed tariff. The questions and results are not on the public record but we gather from the Commission's report that there are similarities in the Everhard position and Shiro's position. We note that in the Everhard Industries Pty Ltd Visit Report ('the Report'), the Commission has indicated that it is likely that, in relation to standalone laundry unit kits, the incorporation of other items with the tub into a full kit may no longer make the imported good a 'deep drawn stainless steel sink'. We submit to the Commission that the Supertub range of products fits into this description of goods, and therefore may be excluded from any anti-dumping measures by virtue of not being the goods subject to the investigation.

PUBLIC RECORD

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Date: 9 September 2014

To: Manager, Operations 2, Anti-Dumping Commission

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**Fully Assembled Standalone Unit**

The Supertubs sold by our client are imported as fully assembled standalone laundry units. While this characteristic distinguishes them from the 'kits' imported by Everhard which are subsequently assembled into standalone units, we believe that the two goods are comparable because, like Everhard's kits, Shiro's Supertubs are priced and invoiced collectively as one item. As the Commission, at 2.3.2 of the Report has advised, it is the fact of incorporation into a single unit which distinguishes Everhard's kits from the goods under investigation. Given the Commissioner's position, we submit to the Commission that Supertubs are similarly relevantly distinguishable from the goods under investigation given that (1) they are imported and invoiced as a single, assembled unit; and (2) they do not compete in a relevant sense with the locally manufactured Tasman product. There is no local manufacture or assembly at all.

Please find information about the Supertub products and invoicing from our client's Chinese manufacturers in the attachments to this letter.

We hope that this submission assists the Commission with its investigation.

Yours faithfully

**HOLMAN WEBB**

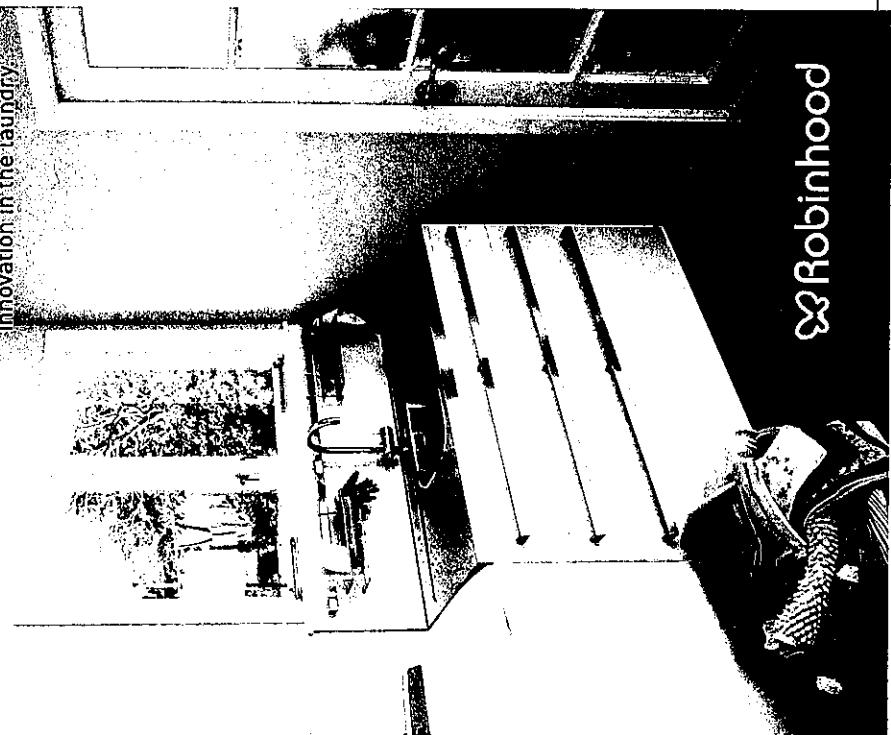


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**Encl**

Superclub

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X Robinhood

X Robinhood

Due to ongoing research and development, the manufacturer reserves the right to change specifications without notice. All specifications are subject to end user, please ask your merchant, terms and conditions are subject to change without notice. Brochure issued Jun 4 2011.

Super new range, super new features

On Saturday afternoons we have been talking to customers and trying to improve our products. We have had some very busy days. They've been calling to customers and trying to get them to come over and try it. The new range of Savoury gives you more choice and more variety. I think it's going to be a success.

Summer school from Sharm el-Sheikh, Egypt

For this range of Supertubs, we've gone away from high gloss. The new powder coated satin finish looks more stylish and is less likely to show fingerprints and other marks.

☐ Tidier hose apertures  
We cleaned up the way the hoses go into a Supertub.

that fits the water inlet hoses and another for the waste water hose. The

There are apertures on both sides so you can configure your SuperHub left or right. There's also a new cover plate that discreetly covers the apertures on the side hoses will go through.

Our tops are both stylish and practical

**Single-handed gooseneck (great for bucket fitting),  
a single-handed mixer (one finger operation) or hot**

for lower water pressure water systems).

Three small black and white photographs showing different views of a mechanical device or component.

In keeping with new laundry design trends, we've centralised the taps and spouts. Perfect symmetry!

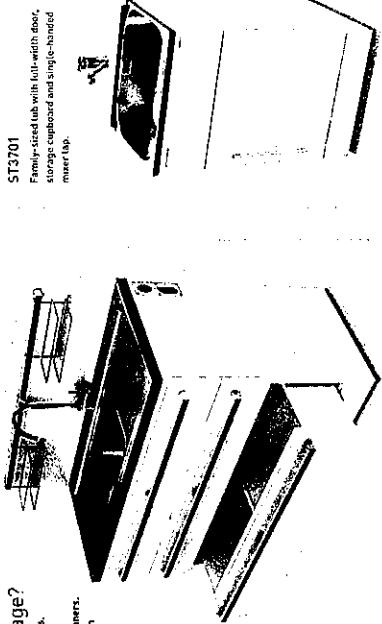
## Choose the Supertub that's right for you

### Looking for maximum storage?

These three Supertubs take storage to new dimensions. The ST700IW workstation has three wide drawers for anything from soap-pushing gear to household cleaners.

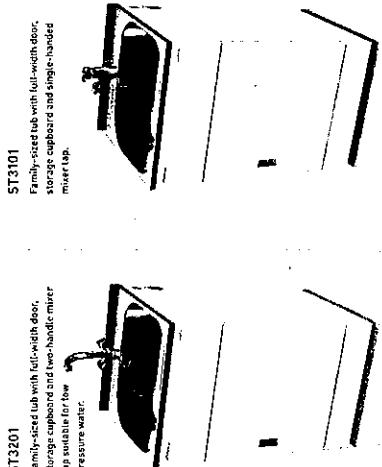
Other storage-friendly choices include the ST700I with two drawers, and the ST600I, which comes with one huge drawer and a chrome wire basket (inside) – a real multi-task storage solution.

**ST270I**  
Family-sized tub with tub-with-door, storage cupboard and single-handed mixer tap.

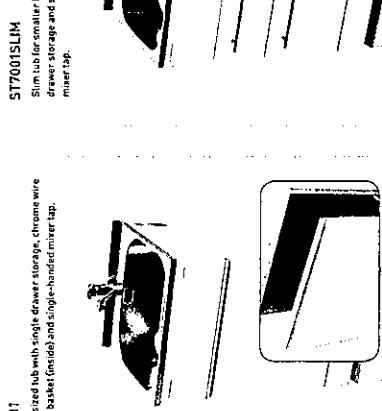


**ST900IW & ST1200**  
Deluxe laundry workstation featuring three giant storage drawers with compartments and single-handed gooseneck tap. Optional ST900IW adds on-tub splashback with rail and two chrome baskets.

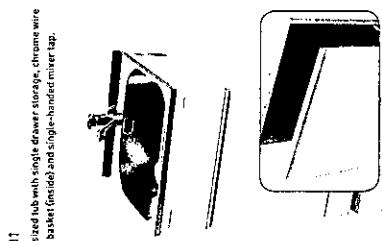
**ST3101**  
Family-sized tub with full-width door, storage cupboard and single-handed mixer tap.



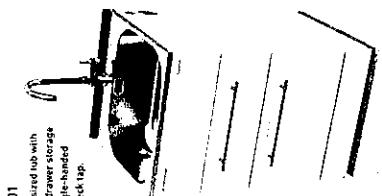
**ST700ISLIM**  
Slim tub for smaller laundries. Double drawer storage, chrome wire storage basket (inside) and single-handed mixer tap.



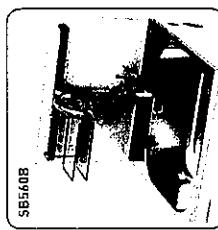
**ST600I**  
Family-sized tub with single drawer storage, chrome wire storage basket (inside) and single-handed mixer tap.



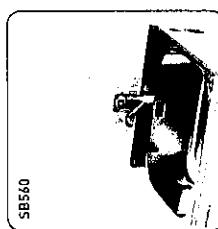
**ST700I**  
Family-sized tub with double drawer storage and single-handed gooseneck tap.



**Stylish splashbacks**  
A splashback serves several purposes – it protects your laundry from water damage. It stops splashed water from running down the wall to the floor, and it gives your laundry a more style. Our splashbacks fit all family-size, non-conical Supertubs. Available in white powder-coat finish, you can choose a standard splashback or the premium splashback with hanging rail and chrome storage basket.



**SB560B**



**SB550**

### Built-in connections reduce plumbing costs

Traditionally plumbers install separate connections for a tub and a washing machine but with a Supertub you're washing machine has to go to the hot and cold water supply from the integrated connections inside. There's no need for the second set of wall outlets saving time, effort and cost on the plumbing. Your Supertub also takes care of the waste water without blocking a hole over the edge of the tub. All Supertubs cleverly incorporate a waste pipe that implants directly to the drain via the trap. It means you can use the washing machine even when you're soaking something in the tub.



*For further information on the Supertub range visit [www.supertubs.com](http://www.supertubs.com)*