

18 September 2014

Ms Andrea Stone
Manager, Operations 2
Anti-Dumping Commission
Customs House
5 Constitution Ave, Canberra ACT 2601



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Bathrooms & Kitchens

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Dear Ms Stone

Deep Drawn Stainless Steel Sinks exported to Australia from the People's Republic of China

We refer to the ADC's ongoing investigation 238 generally and, specifically, the ADC's verification of data provided by [REDACTED].

We understand that the ADC is currently in the process [REDACTED]
[REDACTED]
[REDACTED] [Details of
investigative processes]

[REDACTED] recent communication with the ADC that the ADC has made certain findings in relation to a number of factors that are material to:

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED] [Confidential Issues]

GWA understands that, given the ADC currently proposes to construct normal values for all exporters under Section 269 TAC(2)(c), that the determination of the CTM the GUC, and a rate of domestic profit achievable on sale of the GUC will materially affect the constructed normal value of the GUC exported to Australia.

To assist the ADC's verification of these issues, GWA offers the following comments based upon its understanding of the process of manufacturing the GUC and its experiences as a leading importer and retailer of the GUC in Australia for over 60 years.

Raw material consumption and scrap in the production of the GUC

The ADC has, at this stage of its investigation, had the opportunity to observe the process of manufacturing the GUC. The ADC will have a working understanding of the primary raw materials consumed in the manufacturing process and the stages of production involved. Furthermore, the ADC will appreciate the relative uniformity of production processes .

The nature of the finished goods (both physical characteristics and specification requirements)

[REDACTED]

[Redacted]
[Redacted]
[Redacted] [Confidential comments on production processes]

GWA submits that the production process [Redacted]
[Redacted]
[Redacted] [Confidential comments on production processes]

To assist the ADC's understanding of these issues GWA has provided [Redacted]
[Redacted]
[Redacted] [Details regarding confidential attachments]

GWA would be happy to assist the ADC in relation to this issue with reference to historical production data that GWA may be able to provide upon request.

The calculation of reasonable profit margins on sale of the GUC

GWA manages a variety of well-known brands that have been operating in the Australian market for the GUC for over 60 years. As the ADC is aware following the verification of GWA's importer questionnaire and associated site-visit during the investigation process, GWA maintains exclusive supply relationships with [Redacted]
[Redacted] [Supplier information]

Through its relationship with its supplier's GWA [Redacted]
[Redacted]
[Redacted] [Confidential information regarding suppliers]

Consequently, GWA has direct awareness [Redacted]
[Redacted]
[Redacted]

[Redacted]
[Redacted]
[Redacted] [Confidential commercial information]

The suggestion that [Redacted]
[Redacted]
[Redacted] [Confidential information regarding matters under consideration]

GWA urges the ADC to carefully consider the methodology for determining the rate of profit to be allocated in the construction of Normal Values. GWA submit that the rate of profit that is allocated should be proportionate (and at the very least not exceed) the rates of profit that are actually realized by manufacturers of the goods.

GWA would be happy to assist the ADC with any verification it may wish to perform in relation to this information.

Yours Sincerely,



Trevor Smith

Category Marketing Manager



Caroma

FOWLER

stylus

darf

Irwell

RADIANT

CLARK

dUX

HANSA
Wasser erleben