



2 December 2014

The Director
Operations 2
Anti-Dumping Commission
5 Constitution Avenue
Canberra ACT 2601

Issues Paper 2014/03: Submission by Abey Australia Pty Ltd

This submission is made on behalf of Abey Australia Pty Ltd (Abey) in response to Issues paper 2014/03, published by the Anti-Dumping Commission in relation to the alleged dumping and subsidisation of deep drawn stainless steel sinks exported to Australia from the People's Republic of China (China). Abey has previously requested an exemption from any resulting dumping and/or countervailing duties for tight corner radius sinks, and the issues paper in part addresses this exemption request.

We note the Commission's summary of interested party claims with respect to tight corner radius sinks and the observation that there exists a product 'continuum' in the stainless steel sinks market. We agree that there are various factors considered by a purchaser when making a choice between sinks, but we disagree with the finding that there is 'overlap' between traditional deep drawn stainless steel sinks manufactured by Tasman and tight corner radius sinks.

The issues paper lists the key factors present in purchasing decisions as:

- price
- design
- functionality
- available space for installation of the product, and
- quality.

We contend that the only two factors relevant to a decision between tight corner radius sinks sold by Abey and the traditional sinks produced and sold by Tasman are price and design. All of Abey and Tasman's sinks have identical functionality and are of the highest quality, therefore these are highly unlikely to be factors in a purchasing decision between the two. The space available for installation will determine which size sink to purchase within a range (ie single bowl, 1½ bowl, double bowl etc) and both Abey and Tasman provide a number of different size sinks within each range, therefore this consideration is also unlikely to be a factor in deciding whether to purchase an Abey or Tasman sink.

Non-Confidential – For Public Record

Design

An extract from Abey's brochure showing the 'Lucia' range of tight corner radius sinks is at Attachment A and the brochure for Tasman's Oliveri brand 'Monet' range of sinks is at attachment B. The distinction in design is clear, with the square look of the Lucia in contrast to the rounded look of the Monet. This distinction is further evidence by the significant price differential between the two (see below) and the fact that Tasman imports its own range of tight corner radius sinks (the Sonetto range) to fill the gap in its product range.

Price

Abey's retail price list for tight corner radius sinks is at Attachment C and Tasman's retail price list for its most popular traditional deep drawn sinks is at Attachment D. The prices for standard double bowl models in each range are compared in the following table.

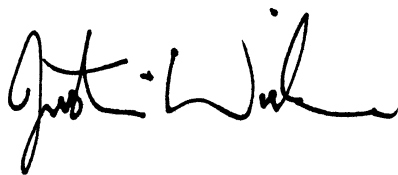
Abey and Tasman double bowl sink prices

Company	Range	Model	Price	Inclusions
Abey	Lago	LG200U	919.55	Drain tray, cutting board
Abey	Lucia	LUA200	990.00	None
Tasman	Diaz	DZ10U	616.00	Drain tray, cutting board, colander
Tasman	Monet	MO70U	731.50	Drain tray, cutting board, colander

As can be seen, the price of Abey's tight corner radius sinks is 26% to 61% higher than prices for Tasman's traditional deep drawn sinks, and the Tasman prices include more accessories. This significant price gap is clear evidence of the distinction between traditional and tight corner radius sinks and the lack of any direct competition or 'overlap' between the two types of sinks.

Conclusion

The design of tight corner radius sinks is easily distinguished from traditional deep drawn sinks and the price differential between Abey's tight corner radius sinks and Tasman's traditional sinks is so significant that there is no 'overlap' in competition as suggested in the issues paper. Therefore, there are no directly competitive goods to tight corner radius sinks manufactured in Australia, and tight corner radius sinks imported by Abey satisfy the conditions for exemption from measures under ss.8(7)(a) and 10(8)(a) of the Dumping Duty Act.



Justin Wickes
Director

LUCIA NEW

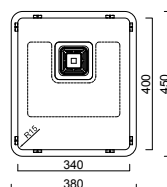


Sleek lines, smooth finish – total sink appeal. Lucia sinkware has been designed and engineered for ease of use, durability and style. They are of exceptional quality, built from the finest stainless steel and will last and last. Available in single and double bowl sinks. Designed with you in mind.

LUCIA_INSET AND UNDERMOUNT NEW

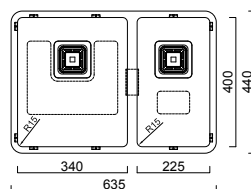
LUA100

_SINGLE BOWL (BOWL DEPTH 200MM)



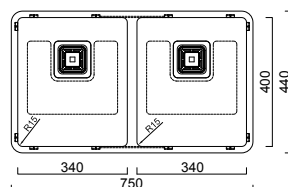
LUA190

_ONE & ONE THIRD BOWL (BOWL DEPTH L 200MM/S 160MM)



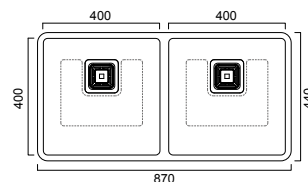
LUA200

_DOUBLE BOWL (BOWL DEPTH 200MM)



LUA240

_DOUBLE BOWL (BOWL DEPTH 200MM. BOWL RADIUS 15MM)



NOTE Lucia sinks can be inset or undermount.

OPTIONAL ACCESSORIES



CBB428A
Lucia Chopping
Board LUA240



DR007
Stainless Steel
Dish Rack
Suitable for
All Models



SCA400LU-S
Sink Cover
Suitable with
LUA240

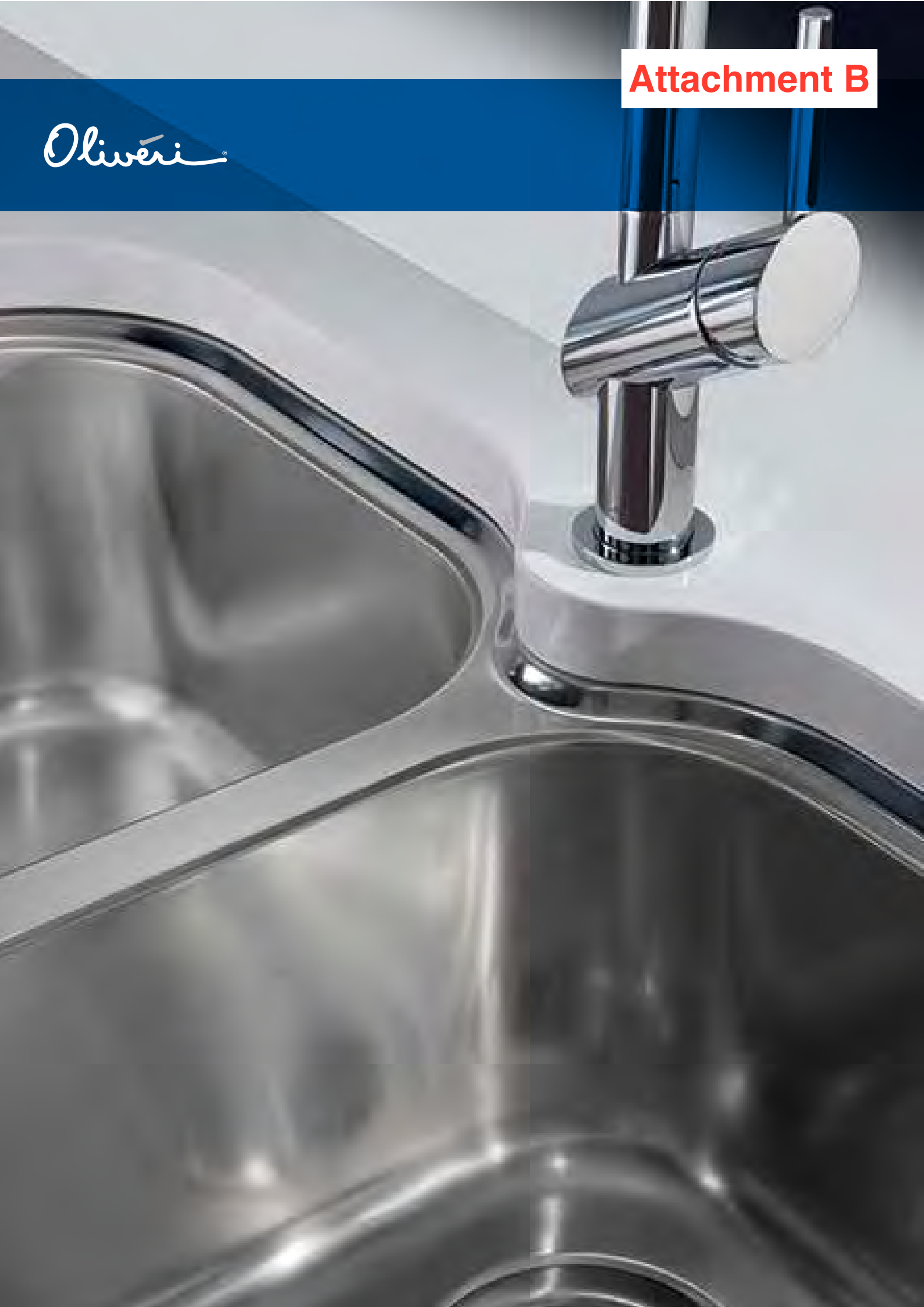


CBB245
Suitable for
All Models



DTA16
Suitable for
All Models

Oliveri



Monet®

A modern masterpiece. Beautiful, soft curves complement contemporary design.

UNDERMOUNT SINKS



MO71U LH Bowl
(MO72U RH Bowl) incl. AC72, AC73, AC74



MO70U incl. AC72, AC73, AC74
Shown with optional HB2030 tap

INSET SINKS



MO763 incl. AC72, AC73, AC74



MO711 LH Bowl (MO712 RH Bowl) incl. AC72, AC74



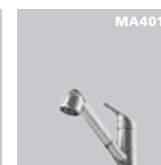
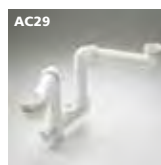
MO771 LH Bowl (MO772 RH Bowl) incl. AC72, AC74



MO753 incl. AC72, AC74

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

ACCESSORIES More accessories are available. See page 29.



RECOMMENDED TAPWARE

FEATURES

Extra capacity main bowl

The D-shaped design allows for a larger main bowl without compromising drainer space.

Undermount installation

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

Rear waste outlets

Allows the maximum amount of usable space in cupboards below.

Custom made accessories

Transforms the sink into a streamlined food preparation area.

Solid supporting bridge

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

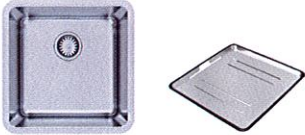

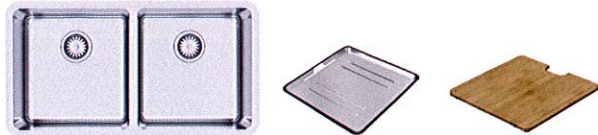
Australian Made

Oliveri has designed and manufactured sinks in Australia since 1948.

LUCIA

PRODUCT DESCRIPTION	DISC CODE	CODE	RRP Ex. GST	RRP Inc. GST
<p>LUA100 NEW Single Bowl Overall Sink Size L380 x W450mm</p> 	SQ	LUA100	495.00	544.50
<p>LUA190 NEW One and One Third Bowl Overall Sink Size L635 x W440mm</p> 	SQ	LUA190	900.00	990.00
<p>LUA200 NEW Double Bowl Overall Sink Size L750 x W440mm</p> 	SQ	LUA200	900.00	990.00
<p>LUA240 Double Bowl Overall Sink Size L870 x W440mm</p> 	SQ	LUA240	967.50	1064.25

LAGO NEW
 UNDERMOUNT RANGE

PRODUCT DESCRIPTION		DISC CODE	CODE	RRP Ex. GST	RRP Inc. GST
LG100U Single Bowl Overall Sink Size L430 x W450mm	Sink Only	SQ	LG100USO	375.00	412.50
	Sink with DT-05 Stainless Steel Drain Tray	SQ	LG100U	462.12	508.33
					
LG180U Double Bowl Overall Sink Size L660 x W450mm	Sink Only	SQ	LG180USO	700.00	770.00
	Sink with DT-05 Stainless Steel Drain Tray and CBB220 Cutting Board	SQ	LG180U	835.95	919.55
					
LG200U* Double Bowl Overall Sink Size L840 x W450mm	Sink Only	SQ	LG200USO	700.00	770.00
	Sink with DT-05 Stainless Steel Drain Tray and CBB390 Cutting Board	SQ	LG200U	835.95	919.55
					

Monet®	Included Accessories	EAN Number	Price	GST	Total
MO711 		1TH: 9324974001865 3TH: 9324974001872 NTH: 9324974001858	695.00	69.50	764.50
MO712 		1TH: 9324974001896 3TH: 9324974001902 NTH: 9324974001889	695.00	69.50	764.50
MO753 		1TH: 9324974001926 NTH: 9324974001919	720.00	72.00	792.00
MO763 		1TH: 9324974002848 NTH: 9324974002831	665.00	66.50	731.50
MO771 		1TH: 9324974001940 NTH: 9324974001933	710.00	71.00	781.00
MO772 		1TH: 9324974001964 NTH: 9324974001957	710.00	71.00	781.00
MO793 		1TH: 9324974003166 NTH: 9324974003159	790.00	79.00	869.00
MO70U 		9324974002800	665.00	66.50	731.50
MO71U 		9324974002817	615.00	61.50	676.50
MO72U 		9324974002824	615.00	61.50	676.50

Main Bowl 350W x 420H x 180D / 24Litre **3/4 Bowl** 280W x 350H x 130D / 11Litre **1/2 Bowl** 215W x 350H x 130D / 9Litre

= Undermount sink = Cabinet size (e.g. 8=800mm) = 720mm minimum bench depth = Australian made sink

Diaz	Included Accessories	EAN Number	Price	GST	Total
DZ101 		1TH: 9324974006273 NTH: 9324974006266	525.00	52.50	577.50
DZ102 		1TH: 9324974006297 NTH: 9324974006280	525.00	52.50	577.50
DZ111 		1TH: 9324974006327 3TH: 9324974006303 NTH: 9324974006310	545.00	54.50	599.50
DZ112 		1TH: 9324974006358 3TH: 9324974006334 NTH: 9324974006341	545.00	54.50	599.50
DZ121 		1TH: 9324974006372 NTH: 9324974006365	360.00	36.00	396.00
DZ122 		1TH: 9324974006396 NTH: 9324974006389	360.00	36.00	396.00
DZ133 		1TH: 9324974006426 3TH: 9324974006402 NTH: 9324974006419	415.00	41.50	456.50
DZ153 		1TH: 9324974006440 NTH: 9324974006433	590.00	59.00	649.00
DZ163 		1TH: 9324974006464 NTH: 9324974006457	560.00	56.00	616.00
DZ171 		1TH: 9324974006488 NTH: 9324974006471	570.00	57.00	627.00
DZ172 		1TH: 9324974006501 NTH: 9324974006495	570.00	57.00	627.00
DZ10U 		9324974006518	560.00	56.00	616.00
DZ150U 		9324974006525	295.00	29.50	324.50

Main Bowl 330W x 400H x 180D / 21Litre **3/4 Bowl** 280W x 350H x 130D / 11Litre **1/2 Bowl** 200W x 290H x 130D / 7Litre

Included accessories shown. More Accessories are available (See pages 14-17)