

2nd December 2014

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

Dear Ms Stone,

In response to the Issues Paper 2014/03 we offer the following comments:

3.3 Individually-imported Lipped Laundry tubs

We note that some Australian Importers and Australian industry have argued that this category of product should be considered like goods to Australian industry produced items.

Whilst both categories of products are deep drawn, to assert that the lipped laundry tubs are operating in the same market as the inset troughs is to totally disregard the actual market position of the two product ranges. It is the equivalent to arguing that a luxury car competes against a utility vehicle, whilst they are both vehicles, they operate in different markets and there is little to no chance of any cross selling.

Lipped laundry tubs are used in basic home configurations with limited or no laundry cupboards. Inset laundry tubs are used in laundries with benchtops and custom made joinery. There is no conceivable real-life scenario where the lipped laundry sink could or would be used in place of the inset tub.

Seima asserts that the individual lipped laundry tub should be exempt as per the Commission determination of section 3.4.

3.4 Free standing laundry units that include a lipped laundry tub

Our comments in Section 3.3 above are also applicable to this section. Furthermore the standalone nature of the complete unit further distances this product from any potential to compete or substitute the Australian industries inset laundry tub.

We assert that there is no commercial basis to consider that a standalone lipped laundry tub can cause a substitution of an inset tub.

3.6 Tight corner radius sinks

As has been detailed in earlier submissions from Seima and other importers, there is a significant difference in the production requirements of tight radius sinks versus the Australian industry manufactured sinks.

Once again, from a market position, the normal radius Deep Drawn Stainless Steel sink is not directly comparable to the tight radius sinks. The two products operate in different product categories with different target markets. Substitution of products from normal sinks to tight radius sinks is not typical.

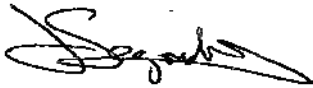
For public distribution

Given that the Australian industry does not manufacture goods in this product category, the inclusion of tight radius sinks within the like goods on the sole basis that it is functionally equivalent is unfounded. Fabricated sinks which are exempt from like goods are also functionally equivalent as are ceramic wash basins, however these are equally out of place as a substitute product and cannot be considered like goods.

Furthermore the fact that the Australian industry must import its own tight radius sinks for sale is further evidence that the tight radius sinks are not like goods and cannot be substituting for Australian produced product.

I look forward to your consideration to the above, please contact the undersigned if you require further information.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Jim Segredos', written in a cursive style.

Jim Segredos
Director
Seima Pty Ltd