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By Email: investigations3@adcommission.gov.au

Director, Investigations 3
Anti-Dumping Commission
GPO Box 2013
CANBERRA ACT 2601
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**Komodo Submission on Statement of Essential Facts No.517
Inquiry Concerning the Continuation of Anti-Dumping Measures Applying to
Deep Drawn Stainless Steel Sinks Exported to Australia From
the People's Republic of China**

This submission is filed on behalf of Komodo Hong Kong Limited and Guangzhou Komodo Kitchen Technology Co., Ltd. (herein after referred as "Komodo") to make comments on the Anti-Dumping Commission's Statement of Essential Facts (SEF) 517 of the Inquiry Concerning the Continuation of Anti-Dumping Measures Applying to Deep Drawn Stainless Steel Sinks Exported to Australia From the People's Republic of China (China).

Komodo noticed that, in the Statement of Essential Facts that issued on 27 November 2019, the Commission identified the supplier of Komodo, i.e. Guangdong Cresheen Smart Home Co Ltd (Cresheen) as the exporter and not Komodo. It is different from that made in the final determination of original investigation, however the operation method and cooperation method of Komodo with supplier maintained no change since the original investigation.

Komodo thinks that it is not proper to just grant the individual AD/CVD duty to Cresheen. As Komodo have shown in the responses to questionnaire. Komodo play the core and most important role in the export sales to Australia, Komodo also participates in the manufacture of subject in the following aspect,

- Komodo designed the products models;
- Komodo provided accessories to Cresheen;
- Komodo sent staff to Cresheen's plant to make quality testing and arrange loading.

Komodo thinks that the Commission shall group Komodo and Cresheen together as a exporter, and decide a joint dumping margin/tax rate to the two companies. That means:

- Cresheen can only enjoy the tax rate when exporting subject products to Australia through Komodo;
- Komodo also can only enjoy the tax rate when exporting subject products



manufactured with Cresheen to Australia.

The advantage of joint dumping margin/tax is:

[REDACTED]
[REDACTED] maintain the effectiveness
of antidumping measure. [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Yours faithfully,
Beijing DHH Law Firm

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