

# INV 691 – Exporter Briefing

16 April 2026

Public File

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# 1. Exporter Questionnaire Response (EQR)

## Guangdong Yuanjiang Facade Co., Ltd

***AGWA/Ventora (the applicants) have identified deficiencies, gaps, and inconsistencies in the public record version of Guangdong Yuanjiang Facade Co., Ltd.'s EQR.***

- Material questions have not been substantively answered (Sections H, J, K).
  - The public record version provides insufficient detail to allow a reasonable understanding of the substance of confidential information.
  - Claimed no-knowledge of publicly available information (Five Year Plans, government departments) is implausible and may indicate non-cooperation on PMS questions.
  - The absence of domestic sales, third country sales, and adequate cost transparency highlights the need for rigorous scrutiny of the response.
- Refer Appendix 1 for the detailed EQR assessment.

# 1. Exporter Questionnaire Response (EQR)

## Altop Façade Co., Limited

***Several deficiencies are identified as significant. If not capable of being rectified, it may warrant a finding that the exporter is uncooperative.***

- MCC modifications: “WW” and “AOWW” codes and an “H6” height band not in the Commission’s MCC structure. Majority of export MCCs use non-existent codes.
  - Cost allocations: costs recorded by project, not product. MCC-level costs reconstructed retrospectively using budgeted ratios, contradicting the claim of an actual cost system.
  - Domestic sales: single domestic MCC, single customer. Insufficient for domestic normal value determination.
  - Related party export sales: material proportion of Australian sales to “Altop Australia” (sister company). Arm’s length pricing not substantiated beyond generic “cost plus target profit” assertion.
  - Pricing documentation: absence of any internal documents supporting pricing decisions.
  - Inconsistences: cost-plus vs competition-based pricing; actual vs budgeted cost claims; credit expense dismissed despite milestone payment terms with post-shipment final payment, etc.
- Refer Appendix 2 for the detailed EQR assessment.

# 1. Exporter Questionnaire Response (EQR)

## Broad Windows & Doors & Curtain Wall System Co., Limited

***Several deficiencies are identified as significant. If not capable of being rectified, it may warrant a finding that the exporter is uncooperative.***

- **Unsigned declaration:** the Exporter's Declaration at p.72 is blank; the response is technically unexecuted.
  - **Contradictions:** Repeated claims of 'no production' in Sections J/K directly contradicted by cost, inventory, and capacity data in Section G.
  - **Unanswered questions/disclosures:** several questions answered with bare cross-references to redacted annexes and insufficient public record summaries.
  - **Export sales channel:** all exports via two related HK trading companies; functions, margins, and costs of intermediaries not separately detailed.
  - **Particular Market Situation:** claimed non-understanding of GOC involvement despite high-tech enterprise tax status and Guangdong Province location.
  - **Subsidy issues:** confused treatment of VAT surcharges. 15% corporate income tax rate confirms countervailable subsidy receipt.
- Refer Appendix 3 for the detailed EQR assessment.

# 1. Exporter Questionnaire Response (EQR)

## Foshan AMJ Windows & Doors Co., Ltd

***Several deficiencies are identified as significant. A response containing deficiencies of this nature and magnitude should warrant treatment as a deficient response***

- **Excessive redactions:** systemic failure to provide bracketed explanations. Public record version non-compliant with questionnaire instructions across multiple sections.
- **Domestic market questions (Section J):** wholesale "does not have such information" response across all domestic market questions, despite manufacturing and selling like goods domestically (incl. the 14-page listing of MCC's sold domestically).
- **Cost data redactions:** cost basis, accounting method, product specificity, and allocation methodology all redacted. No transparency for interested parties.
- **Disclosure contradictions:** for example, section H-4.4 denies government reporting; H-10.1 confirms it. Group status denied but related companies acknowledged with common directors.
- **Particular Market Situation non-compliance:** section H-1.1 entirely redacted. Five Year Plans not provided. No GOC policies acknowledged despite well-documented aluminium sector interventions.
- **Countervailing issues:** only 1 of 3 required years of tax returns. No proof of tax payments. Grant names and authorities redacted despite being public programs.
- Overall, the Commission assess AMJ as a non-cooperative exporter.
- ☐ Refer Appendix 4 for the detailed EQR assessment.

# 1. Exporter Questionnaire Response (EQR)

## Kete Facadetech Co., Ltd

***Several deficiencies are identified as significant. These include extensive unauthorised modifications to the MCC structure, project-level costing, government grants, and capacity utilisation reported at 100% by definition***

- **MCC's:** >400 export MCCs with unauthorised types (CAD, FLD, CAW, AUD), fabricated Category 10, H6 band, combined type strings, W|D identifier.
  - **CTM:** project-level costing only; quarterly breakdown required by template not provided.
  - **Related parties:** x3 related raw material suppliers (aluminium profiles + glass) — arm's length pricing asserted without evidence.
  - **Capacity:** reports actual production as designed capacity, avoiding disclosure of excess capacity available for increased exports.
  - **Grants:** exporter admits receiving grants but claims “no information” on criteria, application, or operation. Directly non-responsive to I-4.4.
  - **Particular Market Situation:** claims unawareness of Guangdong Five Year Plans; no board minutes, no business plans, no pricing notes; all financial activities “N/A”.
- Refer Appendix 5 for the detailed EQR assessment.

# 2. General Observations

## Discussion on Chinese AWD fabricators

### ***The below points are to prompt discussion during the briefing***

- Industry expansion, relocations, new assets, machinery, automation, etc – how funded? The applicants are aware that the Chinese AWD manufacturing footprint and levels of automation have significantly increased in the past 5 years...
- Entity structures (rare that only one entity is involved in selling locally or on export markets).
- Installation labor v's installation costs.
- Façade contracting and façade design.
- Project payments (deposits, retainers, bank guarantees, etc).
- Chinese AWD engineering teams (cost allocations).
- The Australian AWD industry is not a price leader.
- MCC's – any new EQR additions (e.g. Kete) can be incorporated into existing MCC's.
- AWD testing clips (Ventora).

# 3. Raw Material Cost Benchmarks

## Cost Composition

### AWD raw materials

- [*Confidential details deleted: Applicant raw material composition assessment*]:

# 3. Raw Material Cost Benchmarks

## Aluminium extrusions

### INV 657 constructed normal value – aluminium extrusions

In INV 657, the Commission used the Chinese aluminium LME + MJP China import price =====>  
(REP 657, Appendix C-5, p. 196)

± Chinese SG&A  
(REP 657, Appendix C-1, p. 173)

± profit based on like goods sales in OCOT  
(REP 657, Appendix C-1, p. 173).

to arrive at the constructed normal value.

#### **C5 The aluminium cost adjustment**

The Commissioner is satisfied that the equivalent LME + MJP import price to China is an accurate indication of the cost of producing primary and secondary aluminium in China (without influence of GOC market distortions) and is therefore suitable to use for determining an amount under section 269TAC(2)(c)(i).

The Commissioner has determined, based on the evidence currently before the commission, the aluminium costs by comparing the LME-based benchmark cost to the exporter's actual costs and applying the resulting variation as an adjustment to the exporter's records.

The commission used the equivalent aluminium price between PMI and its related entities in Malaysia for the aluminium cost adjustment in this inquiry.

The aluminium cost adjustment is an equivalent import price to China that includes the following components (also described at Table ).

- the price of ingot, equivalent to the LME price (monthly, cash terms)
- a premium for ingot, equivalent to the Major Japanese Ports (MJP) premium for ingot
- billet premium, based on Malaysian costs (as a comparable market to China) to convert the ingot to a billet, and
- inland freight costs from the port of arrival in China to PMI's mill in China.

For the reasons explained below, the commission is satisfied that the value assigned to each of these components reflects the value of those components in China, absent GOC influence. While some of the values are derived by using the price in a different market from China, the commission finds that these prices reflect the cost of aluminium used to produce aluminium extrusions in China once adjustments are made for the effects of the not normal and not ordinary circumstances affecting the price and therefore cost of aluminium. The commission has deliberately sought to isolate and remove the effects of those not normal and not ordinary circumstances, as they have the effect of masking the actual cost of production of aluminium in China. Adjustments to the equivalent LME + MJP import price to China is discussed further below.

The commission assessment of the aluminium cost adjustment is at **Confidential attachment 36: Aluminium benchmark** and the individual export cost record's assessments at **Confidential attachment 37 to Confidential attachment 40**.

# 3. Raw Material Cost Benchmarks

## Float glass

### *Float Glass Products (FGP) from China; 2024 – United States (A-570-188)*

- In FGP from China, the U.S. petitioners claimed that Turkey was an appropriate surrogate country because it is a market economy that is at a level of economic development comparable to that of China based on per-capita Gross National Income and because it was a significant producer of identical merchandise.
- The petitioners argued that Turkish data was publicly available.
- The DOC concluded it was appropriate to use Turkey as a surrogate country for both initiation and final assessment purposes.
- Because Chinese Factors of Production (**FOP**) data was unavailable, petitioners used actual materials, labour and energy (**MLE**) consumption rates from a U.S. float glass producer's POI production experience, stating the production process was similar to a Chinese producer's.
- POI = April. 2024 – Sept. 2024.

# 3. Raw Material Cost Benchmarks

## Float glass (cont.)

### ***Float Glass Products (FGP) from China; 2024 – United States (A-570-188)***

Normal value component	Source
Raw materials	Average CIF import values into Turkey for the POI, sourced from TDM subscription data (NME and unspecified countries, and packing materials excluded).
Electricity	Valued using Eurostat non-household user data for Turkey, converted from EUR/KWH to USD/KWH using E&C official exchange rates (average of Jan.–Jun. 2024).
Natural gas	Eurostat non-household user data for Turkey, converted from EUR/KWH to USD/MMBTU using the same E&C exchange rates.
Labour	Eurostat annual labour cost data (2023, most recent available), published in TRY/hour and converted to USD/hour via E&C exchange rates, then POI inflation-adjusted using Turkish PPI data.
Depreciation	Ratio of SISECAM's (a large Turkish glass manufacturer – see <a href="#">here</a> ) depreciation expense to its cost of materials plus labour, applied to each product's MLE total.
Other Manuf. Overhead	SISECAM's financials didn't disaggregate MOH beyond depreciation, petitioners used U.S. producer's TB's to derive an other-overhead-to-MLE ratio, which was then applied to each product's MLE.
SGA, financial expenses, profit	Derived from SISECAM's audited 2023 annual financial statements.

- The U.S. imposed final Chinese dumping margins of between 151.29% - 181.54%.

# 4. Appendix 1 – Detailed Assessment Guangdong Yuanjiang Facade Co., Ltd

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## Section A – Company Information

- **Checklist errors (p.7):** multiple worksheets unticked without formal N/A notation. Exporter's Declaration bookmark is broken.
- **No sales or production systems (pp.13–14, A-3.5 to A-3.7):** the exporter relies on YIQI financial accounting software with no sales or production tracking. For a project-based manufacturer exporting customised AWDs, this raises significant questions about how MCC-level data was compiled and whether it can be verified.
- **No audit management letter (p.15, A-4.2):** atypical. Auditors ordinarily issue management letters. It may indicate the audit was not conducted to expected standards.
- **Intermediary's accounts unaudited (p.15, A-4.3):** all Australian exports are via a related intermediary whose financial statements are unaudited. This is a significant verification risk, as the Intermediary's margins, costs, and transfer pricing cannot be confirmed.

# 4. Appendix 1 – Detailed Assessment

## Guangdong Yuanjiang Facade Co., Ltd

### Sections B & C – Export Sales & Like Goods

- **Export sales process almost entirely redacted (p.17, B-1.1):** price determination, order process, invoicing, and payment terms are all marked confidential – providing almost no meaningful detail on how export sales to Australia are conducted, falling short of the requirement for sufficient public record detail.
- **Invoicing in CNY, not AUD or USD (p.17, B-1.2):** unusual for FOB export sales. Moves FX risk to the Australian customer.
- **Goods description inadequate (p.21, C-1.1):** Yuanjiang declines to fully describe goods exported, stating “...it is therefore difficult to give full description...” The question requires specification details and technical/illustrative material. Referring only to MCCs is non-responsive.

### Sections D, F & J – Domestic/Third Country Sales

- EQR responses to sections D, F, and J are noted as not Applicable. Yuanjiang exports exclusively to Australia. This makes cost data (Section G) critically important and the sole basis for constructing normal values.

# 4. Appendix 1 – Detailed Assessment Guangdong Yuanjiang Facade Co., Ltd

## Sections E & G – Due Allowance & Cost to Make

- **Packaging costs embedded, not separately identified (p.27, E-2.2):** packaging is recorded within manufacturing cost without separate identification, making it impossible to assess specific cost for normal value adjustment.
- **VAT treatment inconsistency (p.28, E-4.2 vs p.48, H-7.2):** E-4.2 states “no difference in tax liability between domestic and export sales”. However (a) there are no domestic sales to compare, and (b) H-7.2 confirms a 13% VAT export rebate exists (contradiction).
- **Cost allocation methodology entirely redacted (pp.35–36, G-6.1):** the EQR provides no understanding of how costs are allocated between PUC and non-PUC products.

# 4. Appendix 1 – Detailed Assessment Guangdong Yuanjiang Facade Co., Ltd

## Sections H – Particular Market Situation

- **Provincial/City Five Year Plans (p.45, H-4.5):** the EQR states “The Company is not aware of the existence of such documents.” However, the applicants understand that the Foshan City and Guangdong Province have publicly available Five-Year Plans. This non-response may be treated as non-cooperation on a material PMS question.
- **No shareholders' meetings despite name change (p.46, H-4.7 vs p.12, A-2.3):** the EQR states that no board of shareholders meetings were held during the period, yet the company changed its legal name twice (including during the investigation period). Shareholders' resolutions would ordinarily be required for a name change.
- **Capacity expansion details entirely redacted (p.52, H-11.8):** the EQR confirms capacity has increased over 5 years but provides no indication of the scale of expansion on the public record.

# 4. Appendix 1 – Detailed Assessment Guangdong Yuanjiang Facade Co., Ltd

## Section I – Countervailing / Subsidies

- **SIE classification based on commercial databases only (p.59, I-2.1):** in identifying whether raw material suppliers are SIE's, Yuanjiang relies solely on Qichacha / Tianyancha rather than direct knowledge. The Commission should not accept self-assessed SIE classifications based on commercial databases without independent verification.
- **Grant details not disclosed on public record (p.61, I-4.1):** the EQR states that all financial benefits are recorded in Non-operating income and refers to the I-4 Grant worksheet. However, this provides no indication of the number, nature, or quantum of grants received, making the response deficient on subsidy transparency.

# 4. Appendix 1 – Detailed Assessment Guangdong Yuanjiang Facade Co., Ltd

## Section J & K – Domestic & Australian Market

- **Lack of knowledge of Australian market despite exclusive exports (pp.69–70):** section K-1.1(c)(f) states “No access to such information” on demand proportions. At section K-1.3 the exporter is “Not aware of detailed information on significant market participants.” For a company exporting exclusively to Australia, this seems odd.
- **Volume-based pricing unsubstantiated (p.75, K-3.10):** the EQR confirms volume influences price but provides no methodology, thresholds, or internal documents as requested by the question.

# 4. Appendix 2 – Detailed Assessment Altop Facade Co., Limited

# 4. Appendix 2 – Detailed Assessment

## Altop Facade Co., Limited

### MCC Structure

- Pages 21–23 (C-1.2): Altop has created MCC codes not in the structure. “WW” added to Category 1 (Door/Window) and “AOWW” added to Category 3 (Type). Neither exists in the questionnaire’s MCC table at pages 15–16. The overwhelming majority of Altop’s exported MCCs use these self-created codes.
- Pages 21–23 (C-1.2) — “H6” height band does not exist. The Commission’s MCC structure stops at H5 (>2,400 up to and including 3,000mm). Multiple MCCs list H6. This either means the goods exceed the GUC dimensional limits (and should not have been reported), or Altop has created an additional height band.

# 4. Appendix 2 – Detailed Assessment

## Altop Facade Co., Limited

### Related Party Australian Sales

- Page 19 (B-1.3): sales to related entity “Altop Australia” are disclosed. Altop acknowledges some Australian sales were to “the subsidiary of Altop’s sister company, Altop Australia.”
- Selling price methodology described only as “cost plus target profit, fluctuating by the market situation.” No evidence/details of arm’s length pricing is provided.
- Page 91 (K-3.15): the Proportion of related party sales is entirely redacted. Interested parties cannot assess the significance of this issue.
- This is a material issue given Altop describes Australia as its “main market.” If the majority of Australian sales are to a related party, the export price determination under s269TAB requires careful assessment.

# 4. Appendix 2 – Detailed Assessment

## Altop Facade Co., Limited

### Cost Allocations

- Page 38 (G-2.5): Altop records costs by project, not by product or MCC. The exporter acknowledges it does not normally record production costs at the product level. MCC-level cost data was reconstructed retrospectively by the finance department collaborating with production.
- Page 41 (G-6.2): allocation uses pre-production budgeted unit direct material cost proportions to distribute actual project costs. This is a standard/budgeted cost proxy applied to actual costs, which contradicts the G-2.1 claim that the cost accounting system is based on actual costs.
- Page 39 (G-2.8): weighted average method for raw materials but no finished goods valuation. Altop states it “does not evaluate finished goods inventories” on a make-to-order basis. This needs careful verification given the partially assembled nature of all exports (at C-3, p. 29).
- The Commission should scrutinise whether variances between budgeted and actual material costs have been captured, and whether the retrospective allocation produces reliable MCC-level cost data capable of supporting a normal value assessment.

# 4. Appendix 2 – Detailed Assessment

## Altop Facade Co., Limited

### **Production Volumes & Domestic Sales**

- Pages 43–44 (G-9.1, G-9.2, G-9.3): Altop states no difference between production and sales quantities across all responses (no scrap, rework, breakage, or WIP variance acknowledged). For a manufacturer of custom aluminium windows and doors, this is highly unlikely.
- Page 43 (G-9.2): Altop states that “The accounting system does not record the production quantity separately.” There is no independent production record against which to verify the sales-equals-production claim.
- Page 22 (C-2.2): only one domestic MCC sale reported: W-PA-AAW-H1-W1-NTB-SG-NC-F. Single model sold to a single customer. Highly likely insufficient volume for domestic normal value determination under s 269TAC(2)(a).
- Page 59 (H-11.4): only one domestic customer (redacted identity), project in Huizhou, Guangdong. Constructed normal value under s 269TAC(2)(c) or s 269TAC(6) will likely be required for virtually all MCCs.

# 4. Appendix 2 – Detailed Assessment

## Altop Facade Co., Limited

### Pricing Documentation

- Pages 77–81 (Section J) and 86–92 (Section K): Altop repeatedly states “there are no internal documents” or “there are no such internal documents” when asked to provide documentary support for pricing claims. This pattern appears across at least 15 separate questions.
- For a company whose main market is Australia, the complete absence of any documentary evidence of pricing methodology, pricing parameters, pricing review processes, or remuneration structures is notable and is relevant for verification.

# 4. Appendix 2 – Detailed Assessment

## Altop Facade Co., Limited

### Other Inconsistencies

- B-1.5 vs K-3.3: pricing strategy contradiction. At B-1.5, prices are “cost plus target profit, fluctuating by the market situation” (cost-plus). At K-3.3, the “primary pricing strategy is competition-based pricing.” These are different methodologies.
- G-2.1 vs G-6.2: “Actual costs” claim contradicted by budgeted allocation. G-2.1 states costs are based on actual costs; G-6.2 explains MCC-level allocation uses pre-production budgeted material cost proportions.
- E-1.1 vs B-1.1: credit expense improperly dismissed. E-1.1 claims no credit to customers (prepayment), but B-1.1 describes milestone payments with final payment after shipment. A credit period exists.

# 4. Appendix 3 – Detailed Assessment Broad Windows & Doors & Curtain Wall System Co., Limited

# 4. Appendix 3 – Detailed Assessment

## Broad Windows & Doors

### Completeness

- **p. 72, Exporter's Declaration:** name, signature, position, and date fields are all blank. The questionnaire is technically unsigned and unexecuted. This is a threshold completeness issue.

### Contradictions

- **p. 55–60, 'No production' claims:** Sections J and K regularly state “no production of the goods under investigation during the investigation period.” This contradicts Section G (cost to make data provided), G-9.3(b) (production quantities reported), G-10.2(c) (inventory turnover of 69 days with specific RMB figures), and G-10.3 (capital equipment upgrades for producing the goods). The exporter appears to conflate ‘no domestic sales’ with ‘no production’, undermining the reliability of the entire response.
- **G-10.3 vs G-10.5:** at G-10.3 the exporter lists extensive CNC machining centres, precision saws, forklifts, etc. acquired over five years. At G-10.5 it states 'None' for significant investments to upgrade or build production plants.
- **G-9.3(b), zero production/sales variance:** the exporter claims “No difference” between production quantities and sales volumes. For a “bespoke” engineer-to-order manufacturer with 69-day inventory turnover, zero variance is implausible.

# 4. Appendix 3 – Detailed Assessment

## Broad Windows & Doors

### Export Prices & Channels

- **p.12 (A-2.8), HK trading companies:** all exports (including to Australia) are conducted through two related Hong Kong entities: *Broad Windows & Facade Limited* and *Broad Facade International Limited*. The EQR does not separately detail the functions, costs, or margins of these intermediaries. Relevance re export price determination and whether the Commission has sufficient information on the full export price chain.
- **p.19 (D-1.1), domestic sales to export-destined customers:** the exporter states that “Sales made to clients based in the domestic market are ultimately destined for export to Australia.” Are these domestic or export sales? If the exporter sells to domestic Chinese customers who then export to Australia, these may be domestic sales, and/or raise questions about the identity of the exporter.

# 4. Appendix 3 – Detailed Assessment

## Broad Windows & Doors

### PMS & Countervailing Issues

- **p.40 (H-6.1), GOC industry policy:** the exporter states “No” to whether any GOC opinions, directives, or measures concern the AWD industry. Difficult to accept given well-documented GOC policies on the aluminium and building materials sectors.
- **p.40 (H-6.2), Govt. departments:** the exporter states “Our company is not aware...” of which government departments administer measures concerning the industry. Difficult to accept for a manufacturer operating in Guangdong Province.
- **p.51 (I-3.5), 15% corporate income tax rate:** the exporter confirms it pays 15% corporate income tax (vs. 25% standard rate) as a High-tech Enterprise. This is a countervailable subsidy (Program 89 in the INV 691 scope).
- **p.52 (I-4), no grants claimed:** the exporter states no financial grants received during investigation period plus two years prior. Given Guangdong Province location and the INV 691 listed programs, this warrants verification against non-operating income ledgers.
- **p.24 (E-4.2)/p.41 (H-7.1), VAT surcharges, confused treatment:** described as an 'export tax' at H-7.1 but as VAT surcharges at E-4.2. The Commission should clarify.

# 4. Appendix 3 – Detailed Assessment

## Broad Windows & Doors

### Other inconsistencies

- **p.13 (A-3.2), unaudited accounts:** financial accounts during the investigation period are unaudited, while the related HK trading companies' accounts are audited. This creates verification asymmetry as cost data from the unaudited manufacturer cannot be independently corroborated to the same standard as sales data.
- **p.71 (K-4.4, K-3.14), 'No internal documents maintained':** stated twice regarding sales team KPIs and customer tiering policies. For a company deriving 92% of revenue from Australia (p. 66), the absence of any documented pricing or sales management framework is difficult to accept.
- **G-10.2(c), inventory turnover:** calculation uses 2025 calendar year data only (Jan–Dec 2025), but the investigation period = FY2025. The six-month cross over means the calculation does not reflect investigation-specific inventory performance.

# 4. Appendix 4 – Detailed Assessment Foshan AMJ Windows & Doors Co., Ltd

# 4. Appendix 4 – Detailed Assessment

## Foshan AMJ Windows & Doors

### Section A – Company Information

- **A-2.4, Board list omitted:** AMJ states “not applicable” re member changes but never provides the list itself. Required for cross-referencing GOC affiliations in Section H.
- **A-2.5, Group status denied, but related companies exist:** AMJ says it’s “not a group” yet H-2.3 refers to “common directors and officers between Foshan AMJ and its related companies.” The Commission should test the existence and functions of related entities.
- **A-2.7, Australia >90% of exports:** Australia is the most important market, comprising >90% of total exports. Raises questions about why Section K Australian Market contains very little detail.
- **A-2.8, functional roles redacted:** EQR response indicates AMJ does not perform all four functions itself. The second sentence may refer to a related domestic sales channel requiring arm's length testing.

# 4. Appendix 4 – Detailed Assessment

## Foshan AMJ Windows & Doors

### Sections B & C – Export Sales & Goods Classification

- **B-1.3, related Australian customer details fully redacted:** no indication on public record whether sales are to related importers. Critical to export price determination. Australia is >90% of sales.
- **B-1.8(a), date of sale response redacted:** If AMJ is claiming a date other than invoice date, this has significant implications for sales-to-cost matching. The applicants reject any claim other than invoice date. The public record should disclose at minimum whether such a claim is being made.
- **C-3, Product coding methodology redacted:** all details fully redacted. Without understanding how AMJ maps internal codes to MCCs, no transparency on whether MCC assignment is reliable. Relevant to matching cost-to-make data (G-3/G-5) to sales (B-2/D-2).

# 4. Appendix 4 – Detailed Assessment

## Foshan AMJ Windows & Doors

### Sections D & E – Domestic Sales & Due Allowance

- **D-1.2, related domestic customers redacted:** cross-referencing A-2.8 confirms domestic sales through a related channel.
- **D-1.7, date of sale claim:** AMJ claims a non-invoice date “best reflects the sales condition” however provides none of the three mandatory analyses (price determination differences, materials cost timing, contracts). This is a deficient response and should be disregarded.
- **E-1.1, credit expense methodology unclear:** response redacted. It’s unclear whether the prescribed formula (avg AR / turnover / 365) was followed. If AMJ deviated, the basis for its credit calculation is unknown.
- **E-2.3, no packaging differences claimed:** AMJ states no distinct packaging differences between domestic and export sales. In most AWD cases, export packaging (containerisation, bracing for sea freight) differs materially. See slides 47-48.
- **E-4.2, VAT rate and rebate redacted:** VAT rates and export rebates are matters of Chinese law, not company-specific confidential information. These should be disclosed in the EQR.

# 4. Appendix 4 – Detailed Assessment

## Foshan AMJ Windows & Doors

### Sections G – Cost to Make

- **G-1.2 vs A-2.5, related suppliers:** AMJ states no related suppliers, however A-2.5 acknowledges related companies exist. Commission should verify at visit whether any related entity supplies inputs, components, or services to AMJ.
- **G-2/G-6, cost methodology entirely redacted:** cost basis (actual vs standard), accounting method, product specificity, and allocation methodology for raw materials, labour and overheads all redacted. These are methodological — not commercially sensitive. Interested parties cannot assess cost data reliability.
- **G-10, no capacity changes in 5 years:** AMJ claims no changes to capital, technology, investment, or production capacity over 5 years. For a manufacturer with >90% Australia exports, some capacity evolution would be expected. Warrants verification.

# 4. Appendix 4 – Detailed Assessment

## Foshan AMJ Windows & Doors

### Sections H – Particular Market Situation

- **H-1.1, government interaction entirely redacted:** the most important PMS question, covering reporting, taxes, SASAC, approvals, licensing, land, loans, grants. AMJ's entire response is redacted with no bracketed explanation. This is non-compliant with public record requirements.
- **H-4.4 vs H-10.1 direct contradiction:** H-4.4 = "...does not need to submit any reports to the Government of China." H-10.1 = acknowledges making submissions to a govt. organisation. Inconsistency undermining reliability of all PMS responses.
- **H-4.5, five Year Plans not provided:** AMJ states it "...does not receive such kind of documents." The question asks for Provincial/City Five Year Plans for Guangdong/Foshan, which are public documents. Representatives should have obtained and provided them.
- **H-6.1, no GOC policies acknowledged:** AMJ states no GOC opinions, directives, or measures concerning the AWD industry. Difficult to accept given well-documented Chinese government industrial policies affecting aluminium and building materials sectors.
- **H-11.8, no capacity changes in 5 years:** consistent with G-10 position and requires verification. If AMJ has grown to >90% of its sales are Australian, some capacity expansion would be expected.

# 4. Appendix 4 – Detailed Assessment Foshan AMJ Windows & Doors

## Sections H – Particular Market Situation (cont.)

- **Systemic PMS concern (reliability):** the H-4.4/H-10.1 contradiction, failure to provide Five Year Plans, denial of all GOC policies, and claim of no knowledge of any GOC departments collectively undermine the reliability of the entire Section H response and support adverse inferences.

# 4. Appendix 4 – Detailed Assessment

## Foshan AMJ Windows & Doors

### Sections 1 – Countervailing

- **I-4.3/I-4.4, grant details excessively redacted:** AMJ acknowledges receiving grants but names, granting authorities, and eligibility criteria all redacted. Grant program names and authorities relate to publicly administered programs, not company-specific confidential information.
- **I-3.4/I-3.5, tax rate treatment redacted:** general enterprise tax rate and whether AMJ paid less than the standard rate are both redacted. These are fundamental to identifying preferential tax treatment.

# 4. Appendix 4 – Detailed Assessment

## Foshan AMJ Windows & Doors

### Sections J – Domestic Market

- **J-1.1 to J-1.6, wholesale non-response:** almost all sub-questions answered with “the company does not have such information.” This is a significant deficiency. AMJ manufactures and sells domestically but claims zero market knowledge? It undermines the entire EQR.
- **J-2.1 contradicts above J-1 non-response:** At J-2.1, AMJ provides actual market information (“very small market share in China, customers are very stable”). Demonstrates AMJ CAN provide domestic market information, making the above non-disclosures less credible.

# 4. Appendix 4 – Detailed Assessment

## Foshan AMJ Windows & Doors

### Sections K – Australian Market

- **K-1.1, generic and unsourced market descriptions:** responses read as general industry commentary rather than company-specific intelligence (e.g. comments like 'modest revenue contraction' and 'shifting toward energy-efficient products' are generic). No documentary evidence provided despite explicit requirement.
- **K-3.5/K-3.6, pricing process inconsistencies:** AMJ ranks 'production and selling costs' as top pricing factor but K-3.5 says price reviews 'not applicable.' Difficult to reconcile cost-plus pricing claim with no documented pricing or review process.

# 4. Appendix 4 – Detailed Assessment

## Foshan AMJ Windows & Doors

### EQR deficiency highlights...

- **Public record adequacy, systemic failure:** multiple responses fully redacted with no bracketed explanations as required by questionnaire instructions. Systemic non-compliance across Sections A, B, D, E, G, H, and I. The Commission should treat AMJ as non-cooperative.
- **Related companies:** AMJ acknowledges related companies (A-2.5) and common directors (H-2.3), but denies group status (A-2.5), denies related suppliers (G-1.2, H-13.1), and denies related raw material sources (G-7.7). Commission must verify what these related entities actually do.
- **'not applicable' overuse:** 'Not applicable' and 'based on the best knowledge of the company' used repeatedly as substitutes for substantive investigation. These are not acceptable responses to questions requiring factual inquiry.

Taken together, these deficiencies raise the question of whether AMJ should be assessed as a cooperative exporter. The applicant submits that it should be treated as non-cooperative. The EQR response contains major deficiencies that may not be quickly and easily rectified in a supplemental.

# 4. Appendix 5 – Detailed Assessment Kete Facadetech Co., Ltd

# 4. Appendix 5 – Detailed Assessment

## Kete Facadetech

### MCCs

- **New Category 3 ‘Types’ created:** CAD (casement door), AUD (unclear), FLD (folding door), CAW (casement window). Not in INV 691 MCC table (p.9–10). EQR warns models not aligning with MCC must be raised or response “may be considered deficient.” Did the exporter provide a submission as required by the EQR? The exporter’s submission of 23 March 2026 ([folio no. 427](#)) did not raise new MCC matters.
- **New Safety identifiers added:** HS (heat strengthened), CF (ceramic fritted). Not in Category 9 (p.20–30). Creates unrecognisable code strings (e.g. TG-LM-HS-CF-ALS).
- **Fabricated "MCC Category 10" (ALS – aluminium sheet):** INV 691 MCC has only 9 categories. The exporter has invented a tenth and incorporated it throughout B-2 and D-2.
- **Height band H6 used extensively:** INV 691 MCC stops at H5 ( $\leq 3,000\text{mm}$ ). Products exceeding 3.0m height are outside scope.
- **Combined type codes (AFW-AAW, AFW-ALW-CAD, ASD-ALW, etc.) used throughout:** not contemplated by MCC structure and has created ~400+ unique export MCCs.
- **"W|D" used as Category 1 identifier for combined window/door units:** official MCC structure provides only W or D. A further structural modification.
- **Net effect:** ~400+ export MCCs, ~170 domestic MCCs. Degree of granularity will severely complicate model matching, profitability testing, and normal value determination.

# 4. Appendix 5 – Detailed Assessment

## Kete Facadetech

### CTM & SGA

- **Quarterly CTM not provided (pp.47, 49):** EQR requires quarterly CTM by MCC. The exporter reports total project costs across the investigation period instead. Cannot therefore match quarterly costs to quarterly sales for OCOT testing under.
- **Cost specificity at project level only, not MCC (p.46, G-2.5):** raw materials collected by project; labour/MOH allocated by finished product area. MCC-level CTM is derived, not directly recorded.
- **SG&A:** uses total average across all domestic projects (p.48, G-4.2). The exporter acknowledges no identical project names between domestic and Australian markets, recommends average. Dilutes any meaningful SG&A differentiation.
- **Systems:** no production system deployed (p.14, A-3.6). Production quantities manually recorded by workshop staff and submitted monthly (p. 52). No independent system to verify against. Combined with project-level costing, creates significant verification vulnerability.
- **Production v sales:** zero variance between production and sales volumes claimed (p.52, G-9.3). For a project-based manufacturer with concurrent projects and varying lead times, zero variance is implausible. Production data may have been reverse-engineered from sales data.

# 4. Appendix 5 – Detailed Assessment

## Kete Facadetech

### Related Parties

- **Three related raw material suppliers confirmed (p.45, G-1.2):** two for aluminium profiles (XX% and XX% of total), one for glass (XX%). These are the principal inputs.
- **Arm's length pricing asserted without evidence (p.51, G-7.7):** the exporter states that purchase price is "based on the market price" but provides no benchmarking, comparable pricing, or documentary support.
- **One related Australian customer confirmed (p.17, B-1.3):** Identity redacted. Exports through two channels, one involving a related entity. Arm's length nature of pricing requires s.269TAA scrutiny.

# 4. Appendix 5 – Detailed Assessment

## Kete Facadetech

### Capacity Utilisation

- **Capacity utilisation reported at 100% by definition (p.52, G-10.1):** the exporter states that “we report the actual production quantity as the designed capacity.” This does not disclose what the company could produce and whether excess capacity exists for increased exports to Australia.
- **Capacity changes:** the exporter states “No change in production capacity over these years” (p.62, H-11.8). Combined with the 100% utilisation claim, this asserts no growth in productive capacity over 5 years. Should be verified against financial statements, capital expenditure, and subsidies.
- **Investments:** the exporter states “No significant investments during the investigation period” (p.53, G-10.5). For a company relocating to a new production facility in 2026 (p.12, A-1.5), the claim of no significant investment is difficult to reconcile with the planned relocation.

# 4. Appendix 5 – Detailed Assessment

## Kete Facadetech

### Packaging

- **Domestic v's export:** Packaging claimed identical for domestic and export (p.40, E-2.3). Per-unit packaging costs in G-3 and G-5 should therefore match. Commission should verify during verification.
- Nonetheless, there is a difference between AWD domestic and exporting packing materials and therefore costs:

Chinese domestic delivery	Export shipping
Lighter packing focused on scratch protection and short-haul handling. Common features include PE/PVC protective film, corner guards, foam wrap, and upright storage on simple wheeled racks or light frames. The Chinese packaging-film examples (over page) show single units wrapped and grouped for local transport rather than fully crated.	Usually heavier “seaworthy” packing aimed at long transit, repeated handling, and container loading. Common features include timber or plywood frames/crates, thicker padding, strapping, and dense container loading. The export examples(over page) show framed units secured for container shipment.
Packaging is more open: the frame and glass are still visible, and the units are often packed individually or in small grouped batches.	Packaging is more enclosed and rigid: units are bundled into timber structures or crate-like assemblies before loading.
Main objective = to prevent surface damage during factory storage, local dispatch, and short-distance delivery.	Main objective = to prevent breakage, movement, and compression damage during longer sea transit and container handling.

# 4. Appendix 5 – Detailed Assessment Kete Facadetechn

## Packaging (cont.)

Chinese domestic delivery



Export shipping



# 4. Appendix 5 – Detailed Assessment

## Kete Facadetech

### Particular Market Situation – Section H

- **GOS interaction:** GOC interaction described as “little... other than normal administrative dealings” (p.54, H-1.1). For a company in Foshan, Guangdong (a major aluminium processing hub) this statement warrants verification.
- **5-year plans:** the exporter claims unawareness of provincial/city Five Year Plans (p.57, H-4.5). The 14th Five-Year Plan for Guangdong Province and Foshan Municipal plans are publicly available.
- **Governance:** the exporter discloses no details re board minutes, business plans, pricing decision meeting notes, etc (pp.57, H-4.6–H-4.8). For a company with multiple related entities and significant export operations, the absence of governance documentation is unusual.
- **Financial activities:** entirely "Not applicable" (pp.57–58, H-5). The exporter claims no debt, no capital raising, no cash policies, no securities. If correct, this suggests entirely self-funded (unusual for this size of Chinese manufacturer).

# 4. Appendix 5 – Detailed Assessment

## Kete Facadetech

### Countervailing – Section I

- **CRITICAL DEFICIENCY:** the exporter admits to receiving grants but claims “no information” on criteria, application, or operation (p.70, I-4.4). The EQR explicitly requires application forms, confirmation correspondence, proof of payment, and journal entries. An exporter cannot receive govt. funds and claim total ignorance of the basis on which it was provided.
- **Tax:** High and New Technology Enterprise (HTNE) preferential tax confirmed (p.70, I-3.5). Certified 2022, paying 15% CIT vs 25% standard rate. 10pp differential is countervailable (Program 89). Applies 2022–2025.
- **Tax payable:** income tax payable was nil for last three years (p.69, I-3.3). At 15% HNTTE rate, nil tax liability across three years warrants examination (potentially through R&D super-deductions or other tax credits (Program 97)).
- **SIE supplier status:** SIE status of suppliers determined by reference to external website [www.qcc.com](http://www.qcc.com) (p.69, I-2.1). Places burden of verification on Commission rather than providing the information. Inconsistent with cooperative obligations.

# 4. Appendix 5 – Detailed Assessment

## Kete Facadetech

### Domestic Market – Section J

- **Market description:** described in one sentence (p.73, J-1.1(a)): “The Chinese market is highly competitive because many manufacturers are operating there.” The EQR requests characteristics and trends over five years. No detail along these lines was provided.
- **Market participants:** described as “Too many market participants to list” (p.74, J-1.3). No market share estimates or competitor names provided.
- **Pricing strategy:** contradiction on pricing strategy (p.75, J-3.3 vs J-3.4). The exporter states it “does not operate with a product pricing strategy” but then describes cost-based pricing.

# 4. Appendix 5 – Detailed Assessment

## Kete Facadetech

### Australian Market – Section K

- **Market description:** mirrors domestic almost verbatim (p.79, K-1.1). One-sentence answers “not applicable” throughout. Section K adds no new information for the Commission.
- **Pricing:** the exporter provides no price lists, or internal pricing documents, or documented sales frameworks for either domestic or Australian markets. This is repeated across J-3.12, K-3.12, and multiple sub-questions.