Australian Government
Department of Industry, Science and Resources

Anti-Dumping Commission

Investigation No. 691

Aluminium Windows and Doors

Exported from The People's Republic of China

Comparative Variable Factors Assessment

Zhuhai Yipeng Technology Co., Ltd

The Anti-Dumping Commission (commission) has calculated a preliminary dumping margin for Zhuhai Yipeng Technology Co., Ltd (Zhuhai Yipeng).

The commission's approach to normal value and consideration of all alleged subsidies will be addressed in the *Statement of Essential Facts 691* (SEF 691) due to be published on **23 September 2026.**

Table 1 is the commission's assessment based on the information currently available and may not reflect the final position of the commission.

Export Price	Normal Value	Dumping Margin	Subsidy Margin
Section 269TAB(1)(a)[1]	Refer to chapter 1.3	To be determined	To be determined

Table 1: Summary of preliminary variable factors for Zhuhai Yipeng

The commission determined that no onsite or virtual verification would be conducted for Zhuhai Yipeng.

The commission has therefore assessed Zhuhai Yipeng by having regard to its response to the exporter questionnaire (REQ), questionnaires received by other exporters cooperating with the investigation and any other relevant information.

In support of the analysis and findings detailed in this report, the commission has prepared the comparative analysis work program at **Confidential Attachment 1**.

1.1 Zhuhai Yipeng's response to the exporter questionnaire

The commission received a response to the exporter questionnaire (REQ) from Zhuhai Yipeng. It contained relevant information regarding the following:

- Its role in the export of the goods to Australia
- Sales of like goods made by it to export and domestic markets
- The cost of production of like goods, including selling, general and administrative expenses (SG&A)

[1] All legislative references are to the *Customs Act 1901* (Cth) (the Act).

Zhuhai Yipeng is considered a cooperative exporter.

The public version of Zhuhai Yipeng's REQ is available on the electronic public record (EPR) for this case on the commission's website at www.adcommission.gov.au. [2]

1.1.1 Summary of material revisions

The following details revisions performed on the data supplied in the exporter's REQ.

Material revision 1: Exclusion of goods not under consideration

Description: The commission identified transactions in Zhuhai Yipeng's Australian sales listing that were not sales of the goods under consideration. Specifically, these transactions were described as 'Aluminium Alloy Subframe', 'Aluminium Components' and 'Louver'. The commission considered that transactions described as 'Aluminium Alloy Window & Door' were sales of the goods under consideration, consistent with the product descriptions reported in Zhuhai Yipeng's domestic sales listing. **Resolution:** The commission reviewed the Australian sales listing and excluded transactions described as 'Aluminium Alloy Subframe', 'Aluminium Components' and 'Louver' from the dumping margin calculation.

Material revision 2: Revision to ocean freight expense for cost, insurance and freight (CIF) delivery term sales

Description: The commission identified several transactions reported on CIF terms where the reported ocean freight expense was recorded as zero. The commission's review identified that this was caused by a formula issue in the worksheet. **Resolution:** The commission reviewed these transactions and amended the reported ocean freight expense by applying the same formula for the other sales transactions

Material revision 3: Reclassification of insurance premium in SG&A listing

Description: The commission identified that insurance premiums as a direct selling expense in its selling, general and administrative (SG&A) listing. However, insurance premiums were not reported as a separate direct selling expense in the sales listing. The commission considered that insurance premiums were more appropriately treated as an SG&A expense rather than a direct selling expense. **Resolution:** The commission removed insurance premiums from direct selling expenses and included the expense in the calculation of SG&A expenses.

Material revision 4: Removal of domestic sales outside of the investigation period

Description: The commission identified one transaction in Zhuhai Yipeng's domestic sales listing outside the investigation period (1 July 2024 to 30 June 2025). **Resolution:** The commission has removed the transaction from the domestic sales listing in the dumping margin calculation.

[2] EPR 691 document no. 447

Material revision 5: Addition of units of measurement in the raw material purchase listing

Description: The commission identified that Zhuhai Yipeng's raw material purchase listing did not specify the unit of measurement for raw material purchases made during the investigation period.
Resolution: At the commission's request, Zhuhai Yipeng provided an updated raw material purchase listing that specified the unit of measurement for each raw material purchase.

Material revision 4: Revision to net invoice value calculation

Description: Following a review of its reported data, Zhuhai Yipeng advised the commission that the net invoice value in its sales listing had been calculated using a formula that added 'Other Charges or Surcharges' to the gross invoice value. Zhuhai Yipeng submitted that these amounts, comprising testing costs, installation costs and new die costs, were already included in the gross invoice value. As a result, Zhuhai Yipeng submitted that the amounts were effectively counted twice in the net invoice value calculation, resulting in an overstatement of the reported net invoice value.
Resolution: The commission reviewed the revised sales listing and supporting documentation provided by Zhuhai Yipeng, including VAT invoices and project contracts. The commission accepted that the reported testing costs, installation costs and new die costs were already included in the gross invoice value and amended the net invoice value calculation to remove the double counting of these amounts in the dumping margin calculation.

Material revision 5: Removal of value-added tax (VAT) from domestic sales

Description: The commission identified that Zhuhai Yipeng reported domestic sales values inclusive of VAT, while Australian sales values were reported exclusive of VAT. The commission considers that domestic and export sales values should be reported on an equivalent basis to ensure a fair comparison of normal value and export price.
Resolution: The commission adjusted the domestic sales listing to remove VAT from the reported sales values used in the dumping margin calculation.

Material revision 6: Revision to sales listings to include project identifiers

Description: Following further enquiries by the commission regarding Zhuhai Yipeng's sales and costing methodology, Zhuhai Yipeng advised that it manages its sales and cost data on a project basis. To support this explanation, Zhuhai Yipeng provided revised worksheets containing project identifiers linking individual sales transactions to specific projects.
Resolution: The commission reviewed the revised worksheets and used the project identifiers provided by Zhuhai Yipeng in conducting the dumping margin analysis on a project basis.

1.2 Export price

The commission recommends determining an export price for Zhuhai Yipeng under section TAB(1)(a).

Error! Reference source not found. contains the commission's export price calculations.

1.2.1 Who is the exporter?

The commission considers Zhuhai Yipeng is the exporter of the Australian export goods because this company:

- produced the Australian export goods
- is named as the supplier on commercial invoices
- arranged and paid for inland transport to the port of export
- arranged and paid for port handling charges at the port of export

1.2.2 Who is the importer?

For all transactions, the commission considers Zhuhai Yipeng's Australian customer is the importer of the goods exported to Australia. The commissioner considers that the Australian customer beneficially owned the goods at the time of importation into Australia.

For each transaction, Zhuhai Yipeng's customer:

- is named as the consignee on bills of lading
- is named as the importer on import declarations to ABF.

1.2.3 Were the Australian export sales sold at arm's length?

Unrelated customers

All of Zhuhai Yipeng's Australian export sales of the goods in were sold to unrelated party customers. The commission finds that Zhuhai Yipeng sold the Australia goods at arm's length as defined under section 269TAA.

For these transactions, the commission does not find that:

- there was consideration for the goods other than price
- a relationship between a buyer, a seller or their associates appeared to influence the price
- a buyer or buyer's associate directly or indirectly received compensation, reimbursement or another benefit for, or relating to, any part of the price.

Related customers

Zhuhai Yipeng did not have any related Australian customers.

1.3 Normal value

The commission has assessed the following matters that are relevant to the calculation of normal value. However, not all aspects of the exporter's normal value calculation have been examined. This is because the commission has not yet decided to accept or reject a claim concerning an alleged particular market situation in the Chinese domestic market for aluminium windows and doors. The commission's consideration of this claim and the determination of normal values will be detailed in the SEF 691.

1.3.1 Did the verified company produce and sell like goods for the domestic market?

The commission finds that, during the investigation period, Zhuhai Yipeng produced and sold like goods for domestic home consumption.

The commission finds that these goods were ‘like goods’ because these domestics goods are identical to, or closely resemble, the Australian export goods. The commission has described its reasons below.

1.3.1.1 Physical likeness

Zhuhai Yipeng’s goods are made specific to customer or project requirements however similar physical characteristics between domestic like goods and the Australian export goods.

1.3.1.2 Production likeness

Zhuhai Yipeng produced all goods at the same facilities, using the same raw material inputs and production processes.

1.3.1.3 Commercial likeness

All goods compete in the same market sector, are interchangeable and use similar distribution channels.

1.3.1.4 Functional likeness

All goods are functionally alike, as they have similar end uses, however, are manufactured to a specific requirement (covered by the goods description) as per the project contract.

1.3.2 Were the domestic sales sold at arm’s length?

Unrelated customers

All of Zhuhai Yipeng’s domestic sales of like goods in China were sold to unrelated party customers. The commission finds that Zhuhai Yipeng sold the domestic goods at arm’s length as defined under section 269TAA.

For these transactions, the commission does not find that:

- there was consideration for the goods other than price
- a relationship between a buyer, a seller or their associates appeared to influence the price
- a buyer or buyer’s associate directly or indirectly received compensation, reimbursement or another benefit for, or relating to, any part of the price.

Related customers

Zhuhai Yipeng did not have any related customers in China.

1.3.3 Do the accounting records comply with generally accepted accounting principles?

The commission finds that Zhuhai Yipeng’s accounting records for the investigation period comply with the generally accepted accounting principles of China. This is based on the auditor’s opinion contained in the financial statements for the 2023 and 2024 financial years which concluded Zhuhai Yipeng’s financial accounts comply with the Chinese accounting standards.

1.3.4 Did the production records reasonably reflect competitive market costs?

This investigation includes a claim that cost inputs such as aluminium extrusions and glass do not reasonably reflect competitive market costs.

Where the criteria in regulation 43(2) are not satisfied, the Minister is neither required to, nor prohibited from, using an exporter's records pursuant to section 269TAC.

The commission collected information about aluminium extrusions and glass. The commission will review this information when assessing the claim.

This report has not fully considered if the exporter's production records reasonably reflect competitive market costs on account of the investigation involving a claim of particular market situation. SEF 691 will provide further details concerning the assessment of the exporter's production records.

1.3.5 Were domestic sales in the ordinary course of trade?

This report has not assessed if domestic sales were in the ordinary course of trade on account of the investigation involving a claim of particular market situation. The commission's consideration of this claim and the determination of normal value will be fully detailed in SEF 691.

1.3.6 Is there a low volume of relevant domestic sales?

This report has not assessed the volume of relevant domestic sales on account of the investigation involving a claim of particular market situation. The commission's consideration of this claim and the determination of normal value will be fully detailed in SEF 691.

1.3.6.1 Domestic sales volumes for each model

This report has not assessed the sales volume of relevant domestic models on account of the investigation involving a claim of particular market situation. The commission's consideration of this claim and the determination of normal value

1.3.7 Adjustments to compare export price and normal value

This report has not examined adjustments relevant to the comparison of export price and normal value on account of the investigation involving a claim of a particular market situation. The commission's consideration of this claim and the determination of normal values will be detailed in SEF 691.

2 APPENDICES AND ATTACHMENTS

Confidential Attachment 1	Verification work program
Confidential Appendix 1	Export price