

SUBMISSION TO THE ANTI-DUMPING COMMISSION

Investigation No. 691 | Aluminium Windows and Doors from the People's Republic of China

URGENT REQUEST TO RESTORE HENNISSY'S OPPORTUNITY FOR INDIVIDUAL EXAMINATION

A discrete procedural request under section 269TACAA(2)

Submitted by: EcoEco Windows & Doors Pty Ltd**Concerning:** Guangdong Tengying Household Product Co., Ltd (Hennissy)**Status:** PUBLIC RECORD**Date:** 2 September 2026

EcoEco asks the Commission to accept Hennissy's complete exporter information now and extend the investigation to Hennissy for individual examination, unless the Commission identifies and records a specific finding that doing so would prevent timely completion of Investigation 691.

Urgency and separation of issues

This request seeks immediate, practical relief. Granting it would not resolve, withdraw or prejudice EcoEco's separate public challenge to industry standing, notification and participation in Investigation 691.

1. EcoEco's interest

EcoEco has been the established Australian importer connected with Hennissy for approximately nine years. The residual treatment applied to Hennissy therefore has direct commercial consequences for EcoEco, its customers and the continuity of that established supply relationship.

EcoEco makes this request as the directly affected Australian importer. It does not ask the Commission to accept any fact about Hennissy merely on assertion; Hennissy can promptly confirm its participation history and provide the complete exporter information required for examination.

2. The public record

Anti-Dumping Notice No. 2026/004 records that:

- Hennissy, under its legal name Guangdong Tengying Household Product Co., Ltd, completed a Preliminary Information Request (PIR);
- the Commission issued Hennissy a Supplementary Information Request (SIR);
- Hennissy was not one of the six exporters selected for examination;
- the six selected exporters would be contacted directly and invited to complete the full exporter questionnaire;
- a non-selected exporter could obtain the questionnaire from the case page and submit it by 16 February 2026; and
- under section 269TACAA(2), where information is submitted by a non-selected exporter, the investigation must extend to that exporter unless doing so would prevent timely completion.

The notice also states that exporters that completed a PIR and, where requested, an SIR, but were neither selected nor individually examined, would be treated as residual exporters if otherwise cooperative.

Hennissy's legal identity and its participation in the PIR and SIR stages are therefore already matters of public record. EcoEco identifies Hennissy because the procedural disadvantage and the relief requested concern a known, identifiable exporter—not an undisclosed or hypothetical party.

3. What Hennissy understood

EcoEco understands that Hennissy completed the SIR issued to it. Hennissy advises EcoEco that it received no direct invitation or individual explanation telling it that, although it had complied with each request directed to it, it had to initiate a separate full exporter questionnaire response by 16 February 2026 in order to seek individual examination.

The distinction in ADN 2026/004 matters. Selected exporters were to be contacted directly. A non-selected exporter was expected to find and act upon a general statement on the case page. For an exporter that had already responded to both targeted stages of the Commission's sampling process, it was reasonably possible to understand that it had supplied everything then required of it and would be told if further information was needed.

EcoEco does not assert that the Commission positively represented that no further step was required. The point is narrower: the public record does not show that Hennissy was directly told of the self-initiated step, its legal significance or the consequence of remaining residual after substantial cooperation.

4. Why relief is justified

- **Hennissy was known to the Commission.** Its legal identity and contact pathway were established through the PIR and SIR processes.
- **Hennissy cooperated with the sampling process.** It was not an exporter that ignored the investigation or withheld the preliminary information sought.
- **The statutory position favours examination.** ADN 2026/004 describes section 269TACAA(2) in mandatory terms, subject to the timely-completion qualification.
- **The prejudice is material.** Residual treatment substitutes results derived from selected exporters for Hennissy's own verified commercial circumstances and affects EcoEco's established supply chain.
- **The remedy is practical.** Hennissy can be directed to lodge complete exporter information immediately and comply with a compressed verification timetable.

5. Requested action

EcoEco asks the Commission to:

1. confirm what notices, emails, links and instructions were sent directly to Hennissy, the date of each communication and whether any communication expressly explained the need for a non-selected exporter to self-initiate a full exporter questionnaire response by 16 February 2026;
2. invite and accept Hennissy's complete exporter questionnaire information immediately, on a short timetable set by the Commission;
3. extend Investigation 691 to Hennissy for individual examination under section 269TACAA(2), including verification of the information submitted;
4. ensure that Hennissy is not subjected to an adverse inference or procedural penalty arising from any failure of direct and effective notice;
5. if the Commission considers that individual examination would prevent timely completion, provide written reasons identifying the work required, the remaining statutory timetable and why a practical compressed process cannot be accommodated;
6. if a recommendation has already been transmitted, place this request and the Commission's response before the Minister without delay; and

7. confirm that any relief granted to Hennissy does not dispose of, narrow or cause EcoEco to withdraw its separate submissions concerning standing, notification, participation, scope and the reliability of the investigation's starting assumptions.

6. Immediate proposed timetable

Step	Proposed timing	Purpose
Commission invitation and questionnaire	Within 2 business days	Define the information and verification pathway
Hennissy complete response	Within 7-10 business days	Place full exporter data on the record
Clarification and verification	Compressed timetable directed by Commission	Test completeness and reliability
Provisional individual outcome	Before the Statement of Essential Facts or final recommendation	Avoid embedding residual treatment before the issue is resolved

7. Conclusion

Hennissy did not stand outside the investigation. It responded to the Commission's PIR and was sufficiently significant to receive an SIR. The Commission knew who it was, how to contact it and that it was an active exporter of the goods. The fair and legally coherent course is to restore the opportunity for its own information to be examined, subject only to a demonstrated timely-completion constraint.



Edward Stelling

Executive Director

EcoEco Windows & Doors Pty Ltd

Sources

1. Anti-Dumping Notice No. 2026/004, Application of sampling provisions for Investigation 691, 9 January 2026. [Source link](#)
2. Anti-Dumping Commission, How we investigate claims of dumped and subsidised goods. [Source link](#)