

Xing Fa Aluminium Australia Pty Ltd

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Confidential Submission – Xing Fa Aluminium Australia Pty Ltd

(T/A Hi Style Windows, AGWA Member #1004)

Request for Company-Specific Treatment

Investigation 691 – Aluminium Windows & Doors from China

To: The Director and Ms Neletta Nopa Assistant Director – Investigations 1 Anti-Dumping Commission GPO Box 2013 Canberra ACT 2601 Australia

Via email: investigations1@adcommission.gov.au

Date: 12 Oct 2026

1. INTRODUCTION

Xing Fa Aluminium Australia Pty Ltd trading as Hi Style Windows & Doors ("Hi Style") makes this submission in relation to Investigation 691 concerning aluminium windows and doors exported from the People's Republic of China.

Hi Style respectfully asks the Anti-Dumping Commission ("Commission") to assess Hi Style's circumstances separately from the broad conclusions advanced concerning Chinese imports generally.

Hi Style does not oppose the Commission conducting a proper investigation of dumped or subsidised imports where the statutory requirements are established.

However, Hi Style submits that the evidence must distinguish between:

- different exporters and manufacturing arrangements;
- different Australian importers and supply-chain structures;
- different product specifications and performance characteristics;
- different market segments and customer requirements;
- different commercial circumstances; and
- different causal relationships with the Australian industry.

The goods covered by Investigation 691 are defined broadly, including aluminium window and door assemblies up to 3.0 metres high and, for doors, up to 7.0 metres wide. The

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inquiry period is 1 July 2024 to 30 June 2025 and the injury examination period commences 1 July 2021.

A broad tariff description does not mean that every transaction within that description is commercially interchangeable or competes in the same manner.

Hi Style's business is materially different from a conventional Chinese exporter selling standardised goods directly into Australia.

Hi Style is an established Australian operating business with substantial Australian sales, warehousing, estimating, technical coordination, project management, logistics, installation, compliance, warranty and after-sales functions. Its Chinese manufacturing relationship forms part of an integrated supply chain serving the Australian market.

Hi Style therefore respectfully requests that the Commission consider the actual evidence relating to Hi Style rather than applying conclusions derived from other exporters, other products or other business models.

2. EXECUTIVE SUMMARY

2.1 Hi Style is an Australian operating business, not merely a conduit for Chinese exports

Hi Style conducts substantial and ongoing economic activity within Australia. Its Australian operations include:

- sales and customer engagement
- estimating and quotation
- technical coordination
- project management
- warehousing
- freight and logistics
- installation
- Australian-based customer service
- warranty and after-sales support
- compliance coordination
- management of project-specific requirements

These functions demonstrate that the commercial transaction relevant to the Australian customer is not simply:

Chinese factory → Australian customer

It is more accurately:

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Australian customer → Hi Style Australia → integrated Chinese manufacturing supply chain → Hi Style Australia → Australian warehousing/project management/installation/warranty → Australian customer

This structure is materially different from a direct import model and is relevant to both price comparison and any assessment of injury or causation.

2.2 Hi Style's products occupy a different market segment from commodity residential windows

A significant proportion of Hi Style's supply is directed to commercial, architectural and higher-specification residential applications. These products differ materially from standard residential windows commonly used in the Australian domestic market.

Hi Style's products frequently involve:

- project-specific design and detailing
- larger and more complex window and door assemblies
- double glazing and wet-glazed configurations
- higher performance classifications
- large-format units, including heights approaching 3,000 mm
- curved, shaped or architecturally specialised assemblies
- project-specific engineering and certification
- acoustic and structural performance requirements
- customised configurations
- Australian installation, commissioning and warranty obligations

These characteristics place Hi Style's products in a **distinct specification segment**, not in the commodity residential segment relied upon by many Australian manufacturers.

Accordingly, a comparison based solely on the fact that two products are "aluminium windows" does not reflect commercial reality. Any price or injury analysis must recognise the segmentation between:

- **commodity residential windows**, and
- **higher-specification commercial/architectural systems** supplied by Hi Style.

2.3 Price differences cannot automatically be treated as evidence of dumping

Differences between Australian and Chinese manufacturing costs may arise from legitimate commercial factors, including:

- manufacturing scale
- supply-chain integration
- procurement efficiencies

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- labour structure
- utilisation and automation
- system design
- logistics
- overhead structure

EPR 486 similarly emphasises the need to distinguish manufacturing structure, scale, integration, system value, supply-chain margins and other commercial cost differences from dumping.

A lower price does not, by itself, establish dumping. Price comparisons must be made on a **like-for-like basis**, taking into account:

- specification differences,
- performance requirements,
- project-specific engineering,
- installation obligations, and
- the Australian economic activity performed by Hi Style.

2.4 The injury case must establish causation, not merely coincidence

Hi Style does not dispute that the applicants have presented evidence of deterioration in certain indicators relating to Ventora.

The relevant question, however, is whether material injury to the Australian industry was caused by dumped imports and, more specifically for Hi Style, whether Hi Style's imports formed part of that causal mechanism.

Deterioration in an applicant's economic indicators does not by itself establish that dumping caused that deterioration. It also identifies ordinary domestic competition, changing customer preferences, product mix, costs, restructuring, acquisition and other factors as matters requiring separation from dumping effects.

2.5 Hi Style asks for company-specific treatment

Hi Style respectfully requests that the Commission:

examine Hi Style's circumstances separately;

assess the actual Hi Style export transactions and product characteristics;

assess the Australian functions and costs incurred by Hi Style;

ensure that genuinely comparable products are compared;

separate legitimate competitive advantages from dumping effects;

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conduct an exporter-specific dumping analysis where the evidence permits;

avoid applying a residual or blanket rate to Hi Style merely because of its country of origin or corporate structure; and

if legally available and supported by the evidence, exclude or otherwise separately treat Hi Style's goods/business segment from any measure.

3. HI STYLE'S BUSINESS AND AUSTRALIAN ECONOMIC ACTIVITY

Hi Style has operated in the Australian market for more than ten years.

It is Australian-owned and operated and conducts its customer-facing commercial activities in Australia.

The business includes Australian personnel responsible for:

sales;

estimating;

technical and design coordination;

customer communication;

project management;

freight and logistics;

warehousing;

installation;

compliance;

warranty;

and after-sales service.

Hi Style maintains Australian premises and carries the commercial risks associated with serving Australian customers.

The business with expenditure occurring locally.

That local expenditure includes, among other matters:

Australian employee wages;

warehouse and office occupancy;

local subcontractors;

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installation;

logistics;

procurement;

insurance;

statutory employment costs;

and other Australian operating expenses.

These are not incidental activities undertaken after a simple import transaction.

They form an essential part of the business model through which Hi Style supplies its customers.

Hi Style also procures Australian-manufactured window products, including specialised systems supplied by Australian manufacturers.

Any duty imposed on Hi Style's imports would reduce Hi Style's capacity to purchase Australian-made products, including those supplied by the applicant's own group.

This creates a commercial inconsistency: the proposed duties would diminish Hi Style's expenditure on Australian-manufactured goods and reduce revenue flowing to the applicant's own Australian operations.

The Commission should consider whether a remedy that reduces demand for Australian-made products supplied by the applicant aligns with the statutory objective of addressing injury.

Accordingly, Hi Style should not be economically characterised in the same manner as an overseas exporter whose only material function is to manufacture and ship goods to an unrelated Australian importer.

5. AUSTRALIAN VALUE ADDED AFTER IMPORTATION

A critical feature of Hi Style's business is that the imported goods are not simply purchased and immediately resold.

Hi Style undertakes substantial activities in Australia.

These include:

Sales and estimating

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Hi Style receives customer requirements, prepares quotations, interprets drawings and specifications and determines appropriate products.

Technical coordination

The Australian business coordinates product specifications, glazing, hardware, dimensions, performance requirements and project-specific details.

Project management

Hi Style manages customer requirements, delivery schedules, site requirements and installation coordination.

Warehousing

Goods are received, stored, inspected and managed in Australia before delivery or installation.

Installation

Hi Style incurs Australian labour and subcontracting costs associated with installation.

Compliance

The business must address Australian standards and project-specific compliance requirements.

Warranty and after-sales

Hi Style remains responsible to Australian customers for warranty and after-sales matters.

These functions carry real costs and commercial risk.

The Australian selling price therefore cannot properly be compared with a Chinese factory cost without recognising the different functions performed at each stage.

6. PRODUCT CHARACTERISTICS AND MARKET SEGMENTATION

The Commission's investigation covers a broad category of aluminium windows and doors.

However, the fact that goods fall within the same legal goods description does not establish that all products have the same competitive relationship.

EPR 486 expressly identifies product comparability and market segmentation as important issues, noting that products can differ by dimensions, glazing, wind rating, water performance, thermal performance, configuration, acoustic performance, quantity, service, delivery, warranty and engineering.

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Hi Style submits that these considerations are particularly relevant to its business.

Its products include higher-specification and project-specific goods involving, among other things:

- double glazing;
- wet glazing;
- larger panels;
- larger overall assemblies;
- project-specific engineering;
- higher wind and water-performance requirements;
- acoustic performance;
- architectural configurations;
- curved work;
- specialised hardware;
- and customised fabrication.

The commercial customer purchasing such a product is not necessarily making the same purchasing decision as a customer purchasing a standard residential single-glazed aluminium window.

7. DOUBLE GLAZING AND HIGHER-PERFORMANCE PRODUCTS

The distinction between standard residential products and higher-performance products is particularly relevant to Hi Style.

Hi Style supplies double-glazed configurations and products requiring more substantial framing, glazing and engineering.

The additional cost of such products is not evidence of dumping or absence of dumping.

Similarly, a lower price for a conventional single-glazed product does not establish that a double-glazed or higher-performance Hi Style product competes directly with that product.

The Commission should therefore ensure that any price effects, undercutting analysis and causation analysis are based upon genuinely comparable products and commercial circumstances.

A comparison that combines:

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standard residential single glazing + double glazing + commercial systems + architectural systems + large-format units

into a single average may conceal rather than reveal the competitive relationship.

8. LEAD TIME AND COMMERCIAL CIRCUMSTANCES

Hi Style's imported products are generally subject to a substantially longer supply chain than locally manufactured standard products.

The typical import lead time is approximately 8–12 weeks.

This has commercial consequences.

A customer who requires an immediate replacement or a short construction-program lead time may not regard an imported product and a locally available product as interchangeable, even where both are technically "aluminium windows".

Conversely, customers who specify higher-performance, customised or architectural products may accept a longer lead time because of the particular product specification.

Lead time is therefore part of the competitive circumstances.

It is not simply a logistical detail.

The Commission should consider:

quoted lead time;

project programming;

product specification;

customer type;

installation requirements;

warranty;

technical support;

and performance requirements

when assessing whether a particular imported product actually displaced an Australian product.

9. HI STYLE IS NOT A COMMODITY DUMPER

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Hi Style does not operate by importing an undifferentiated commodity product and competing solely on the lowest price.

Its business depends on:

technical knowledge;

product selection;

project-specific fabrication;

Australian estimating;

customer service;

Australian logistics;

installation;

compliance;

warranty;

and technical coordination.

The Chinese manufacturing facility is one part of that supply chain.

The commercial proposition offered to an Australian customer includes substantially more than the factory invoice value.

Accordingly, the Commission should be cautious about using a generic Chinese export-price comparison as a proxy for Hi Style's actual competitive position.

10. ORDINARY COMPETITION MUST BE DISTINGUISHED FROM DUMPING

Hi Style submits that the Commission should distinguish between:

legitimate competitive advantage arising from manufacturing efficiency or supply-chain structure; and price effects caused by dumping.

EPR 486 makes the same conceptual distinction, noting that a reduction in market share or a lower Chinese price does not, without more, establish dumping injury.

This is important in the Australian window market because Australian manufacturers and importers do not operate under identical cost structures.

An Australian producer may incur:

extrusion costs;

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fabrication costs;
system-owner costs;
multiple distribution margins;
labour costs;
premises costs;
compliance costs;
inventory costs;
and other domestic overheads.

An overseas integrated manufacturing operation may combine several of these stages within a single supply chain.

A cost difference therefore does not automatically establish dumping.

11. INJURY AND CAUSATION

Hi Style respectfully submits that the Commission should not move directly from:

imports increased

to:

Australian producer suffered deterioration

to:

imports caused that deterioration.

Each proposition requires evidence.

EPR 486 makes the same distinction, observing that Ventora's deterioration does not itself establish that Chinese imports caused that deterioration. It identifies other possible factors, including domestic competition, changing product/customer mix, costs, restructuring, acquisition and financing.

Hi Style submits that the Commission should therefore ask:

11.1 Which Australian sales were actually lost?

11.2 To whom did those sales go?

11.3 What products were involved?

11.4 Were those products genuinely comparable?

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11.5 Were the relevant imports dumped?

11.6 Was the relevant price difference caused by dumping rather than manufacturing structure or specification?

11.7 Did the relevant customer actually choose the imported product instead of the Australian product?

11.8 Was the customer purchasing a different performance specification?

11.9 Did domestic competitors capture some of the lost business?

11.10 Did changes in market demand or customer preference contribute to the outcome?

Without answering these questions, an aggregate increase in Chinese imports cannot establish the causal link necessary to apply a measure against Hi Style's business.

12. THE APPLICANTS' OWN RECENT SUBMISSION DEMONSTRATES THE NEED FOR DIFFERENTIATION

EPR 487 is particularly relevant.

The applicants have themselves identified material differences among exporters and transactions.

For example, their submission discusses:

exporters with related Australian entities;

exporters using related traders;

project-based transactions;

different domestic-sales volumes;

different model matching issues;

different normal-value methodologies;

related-party aluminium and glass purchases;

and different levels of data reliability.

Hi Style does not criticise the Commission for examining these matters.

To the contrary, Hi Style submits that this demonstrates why the Commission should examine each materially different commercial structure on its own evidence.

The existence of a common country of origin does not eliminate these differences.

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Nor should the existence of a broad goods description eliminate them.

13. PARTICULAR MARKET SITUATION AND CHINESE INPUT COSTS

Hi Style notes that the applicants continue to argue that Chinese aluminium extrusion and flat-glass costs do not reasonably reflect competitive market costs.

EPR 487 states that the Commission had not yet determined the PMS and competitive-cost questions and that the applicants seek benchmark substitution for aluminium extrusion and flat glass when constructing normal value.

Hi Style respectfully submits that any such finding must be carefully connected to the actual goods and transactions under examination.

A finding concerning upstream Chinese input markets does not, by itself, establish:

that every Chinese manufacturer purchased inputs at distorted prices;

that every exporter received an equivalent benefit;

that every finished window was dumped;

that the export price of every exporter was affected in the same manner; or

that a particular Australian importer caused injury to an Australian producer.

The Commission should therefore distinguish:

upstream market conditions from:

the actual cost and price of the finished goods exported by Hi Style's manufacturing supplier.

14. THE COST OF THE AUSTRALIAN SUPPLY CHAIN MUST NOT BE CONFUSED WITH DUMPING

The Australian selling price of a Hi Style product includes costs and functions that occur after manufacture.

These may include:

international freight;

insurance;

Australian customs and import costs;

warehousing;

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handling;
Australian labour;
estimating;
technical coordination;
project management;
installation;
warranty;
after-sales;
administration;
and Australian business overhead.

These costs do not constitute evidence that the Chinese factory price is dumped.

Equally, the fact that an Australian producer has a higher cost base does not establish that a competing imported product is dumped.

The Commission should construct the appropriate comparison using the statutory methodology and appropriate adjustments rather than treating the difference between Australian delivered costs and Chinese manufacturing costs as a dumping margin.

15. HI STYLE'S PRE-2021 EXISTENCE AND THE INJURY PERIOD

Hi Style's Australian business and its business model was established before the commencement of the Commission's injury examination period on 1 July 2021.

This is important.

Hi Style was not created during the investigation period as a vehicle to exploit allegedly dumped imports.

It was an established Australian business serving Australian customers before the period in which injury is alleged.

Its Australian operations, customer base, warehousing, personnel and commercial relationships developed independently of the present investigation.

Accordingly, the Commission should consider the historical development of the business when assessing causation.

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If Hi Style's business model and market position pre-dated the alleged injury period, the Commission should not assume that the existence of that business during the injury period itself demonstrates a causal relationship with deterioration experienced by the applicants.

16. A BROAD INDUSTRY FINDING SHOULD NOT AUTOMATICALLY BECOME A HI STYLE FINDING

The Commission is examining a large and heterogeneous market.

Within that market are:

Australian manufacturers;

system owners;

fabricators;

installers;

importers;

vertically integrated businesses;

project suppliers;

residential suppliers;

commercial suppliers;

architectural suppliers;

and businesses combining several of these functions.

The same applies to Chinese exporters.

The existence of a common country of origin does not make those businesses economically identical.

Hi Style therefore respectfully submits:

Any remedy should be supported by evidence relating to the goods, exporters, market segments and injury actually established by the Commission.

A broad residual rate should not become a substitute for company-specific analysis where the necessary information is available.

17. HI STYLE'S REQUEST FOR COMPANY-SPECIFIC CONSIDERATION

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Hi Style respectfully requests that the Commission:

A. Examine Hi Style separately

Assess the actual commercial circumstances of Hi Style and its manufacturing supplier.

B. Examine actual transaction data

Use verified transaction-level data where available.

C. Match genuinely comparable products

Take account of:

dimensions;

glazing;

performance;

system;

hardware;

configuration;

project circumstances;

and other relevant characteristics.

D. Recognise Australian functions

Take account of the substantial functions and costs incurred by Hi Style in Australia.

E. Examine related-party transactions transparently

Do not treat related-party status as determinative without examining actual pricing and cost evidence.

F. Separate legitimate competitive advantages from dumping

Manufacturing efficiency, scale, integration and supply-chain structure should not automatically be treated as dumping.

G. Examine causation specifically

Determine whether Hi Style's goods actually caused injury to Australian producers.

H. Avoid residual treatment where Hi Style-specific information is available

Hi Style respectfully submits that where verified information is available, a residual exporter rate should not be applied merely because the goods originate in China.

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18. Hi Style is prepared to provide supporting evidence, including:

- **Australian business operations** (company records, payroll, insurance, subcontractor and procurement records)
- **Australian sales and project documentation** (quotations, invoices, specifications, project files)
- **Chinese manufacturing and cost information** (purchase records, production data, material and labour costs, export documentation)
- **Product and technical information** (system drawings, glazing specifications, performance reports, test results)
- **Supply chain documentation** (freight records, customs documentation, warehouse receiving and installation records)

This evidence enables the Commission to assess Hi Style's circumstances directly rather than relying on assumptions drawn from unrelated parties.

19. CONCLUSION

Hi Style is not a circumvention vehicle, shell importer or conduit entity. Its Australian operations pre-date the injury period and include substantial local expenditure, personnel, warehousing, installation, compliance and warranty obligations. Hi Style's commercial model is independent of the present investigation and should not be characterised as a structure created to exploit alleged dumped imports.

Hi Style respectfully submits that Investigation 691 should not be determined by a general proposition that Chinese aluminium windows and doors are interchangeable, that all Chinese exporters operate in the same manner, or that every Australian producer competes with every Chinese product on the same basis.

The public record now demonstrates the complexity of the market.

Hi Style's circumstances are materially specific.

It is an established Australian operating business.

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It has substantial Australian employees, expenditure, warehousing, estimating, technical coordination, project management, logistics, installation, compliance, warranty and after-sales activities.

Its products include higher-specification and project-specific goods, including double-glazed, wet-glazed and large-format products.

Its supply chain involves substantially longer lead times.

Its Chinese manufacturing relationship is part of an integrated Australian supply chain and should be examined on its actual evidence.

For these reasons, Hi Style respectfully asks the Commission to:

assess Hi Style separately from unrelated Chinese exporters;

assess the actual products and transactions imported by Hi Style;

ensure meaningful product and commercial comparability;

recognise Hi Style's substantial Australian functions and costs;

separate legitimate manufacturing and supply-chain advantages from dumping;

separate dumping effects from other causes of any injury;

avoid drawing adverse conclusions from unrelated exporters or products;

determine Hi Style's position on the basis of verified Hi Style-specific evidence; and

where legally available and supported by the evidence, exclude or separately treat Hi Style's goods from any measure, or otherwise determine an appropriate company-specific rate.

Hi Style does not ask the Commission to disregard evidence of genuine dumping where it is established.

It asks only that the same evidentiary discipline be applied to Hi Style as to every other party:

Identify the actual goods.

Identify the actual transaction.

Match genuinely comparable products.

Verify the actual costs and prices.

Separate legitimate competition from dumping.

Establish actual injury and causation.

Then apply only the measure justified by the evidence.

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Yours faithfully,

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