

Submitted by: Foshan Nanhai Yubang Doors and Windows Co., Ltd.
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1. Introduction

This submission is filed by Foshan Nanhai Yubang Doors and Windows Co., Ltd. ("the Submitter") in response to Statement of Essential Facts (SEF) No.691 published by the Australian Trade Remedies Commission (ATRC) dated 14 October 2026 under the Customs Act 1901.

Our company is a manufacturer of thermal- break aluminium windows and doors in the People's Republic of China. **During the investigation period 1 July 2024- 30 June 2025, our company completed one single small- volume export shipment of subject aluminium windows and doors to Australia.**

We became aware of this anti- dumping and counter- vailing duty investigation at a relatively late stage of the proceeding. For this reason, we failed to submit the Preliminary Information Request (PIR) questionnaire in the initial investigation phase. Accordingly we are provisionally treated as an uncooperative exporter under Investigation 691.

We acknowledge that the sampling procedure for this investigation has been closed and individual examination for new exporters cannot be granted at this procedural stage. Nevertheless, we submit this document plus supporting evidence for the Commissioner's consideration for the final report. This submission also preserves our procedural rights for exemption application and any future review proceedings.

2. Factual background of our Australia- bound shipment

1. In investigation period, we only had **one single small- volume export transaction of subject goods to Australia.** This Australian shipment accounts for a very minor fraction of our company's overall sales turnover; our core business is domestic China market and other overseas markets excluding Australia.

2. This transaction was concluded with a fully independent Australian importer at arm's-length. There exists no related-party relationship between our factory and this Australian customer.
3. All goods were fully manufactured in-house at our own factory in China.
4. This shipment was processed with assistance of a Chinese export-declaration service agent (OneTouch / Alibaba). Our company is the actual manufacturer and commercial seller of the goods. The export-service agent only undertook China customs declaration formalities; it was neither the owner of goods nor the commercial seller towards the Australian buyer. All commercial negotiation, product manufacturing and technical specification confirmation were performed by our company.
5. Our company formally obtained **AS 2047 Australian product certification in February 2026**, which demonstrates our product complies with Australian national standard for windows and external glazed doors.
6. Shipment-related commercial financial details are contained in separate confidential submission. This non-confidential submission provides product specification, certification documents and drawings without sensitive financial data.

3. Comments on SEF preliminary findings

3.1 Particular market situation - raw-material distortion finding

We respectfully take issue with the preliminary finding that Chinese aluminium extrusion and glass sectors suffer from government-caused market distortion creating a "particular market situation".

Our company purchases aluminium extrusions and glass from open, competitive domestic spot markets at prevailing market-determined prices. We have never obtained subsidized or policy-favoured raw-material inputs.

Cost built by applying external benchmark adjustments may deviate from our real manufacturing expenses and risk artificially inflating dumping margin. We respectfully request the Commissioner to duly consider actual transaction-based costs of individual market-oriented manufacturers in final assessment.

3.2 Material injury and causation

We note the preliminary conclusion that dumped and subsidised imports from China caused material injury to Australian domestic AWD industry.

Our single small- volume shipment in investigation period represented extremely tiny market volume in Australian AWD market. This isolated low- value shipment could not have contributed materially to any alleged material injury of Australian local industry.

4. Application for product- exemption consideration

Without prejudice to above arguments, we hereby formally apply our exported AWD products to be assessed for exemption from definitive anti- dumping / countervailing duties.

Our exported goods: **Thermal- break aluminium awning / sliding windows, within dimension scope defined by Investigation 691.** Our products hold valid AS 2047 Australian certification and are manufactured to meet Australian building- product requirements.

Attached annexures include product drawings, technical specification sheets and our AS 2047 certification report. We reserve the right to provide further supporting materials upon ATRC's request.

5. Procedural requests

1. Kindly place this non- confidential submission on the Electronic Public Record (EPR) of Investigation 691.
2. Notwithstanding no individual- exporter examination can be granted at this stage, please fully consider all facts and evidence submitted herein for final- report drafting, including our late awareness of this proceeding, small- volume shipment facts and valid Australian AS 2047 certification status.
3. We reserve all our legal rights for any future review or exemption- related proceedings. We note that due to one small- volume shipment during investigation period, we do not satisfy the prerequisite for accelerated new- exporter review.
4. Our team stands ready to respond to any further information request issued by ATRC.

Annexures

Non- confidential annexures

Annexure 1: Product drawings & technical specification Annexure 2:
Non- confidential shipment summary (financial value redacted) Annexure 3: Copy of
AS 2047 certification (obtained Feb 2026)

Signature: 

Kim Liang General Manager Foshan Nanhai Yubang Doors and Windows Co., Ltd.