

AUTU GROUP
trading as TUSMART DOORS

Melbourne, Victoria | ABN 75 614 927 883 | tusmartdoors@gmail.com | 0426 663 191

NON-CONFIDENTIAL - FOR PUBLIC RECORD

Applicant and importer: AUTU GROUP (ABN 75 614 927 883), trading as TUSMART DOORS

22 October 2026

The Commissioner

Australian Trade Remedies Commission

GPO Box 2013, Canberra ACT 2601

By email: investigations1@atrc.gov.au

Copy: Ms Neletta Lopa, Case Manager, Investigations 1

Re: Investigation No. 691 - Aluminium windows and doors exported from the People's Republic of China
Application for exemption from measures - and in the alternative, exclusion of the goods from the
description of the goods under consideration - complete aluminium garage door systems

Dear Director,

1. The applicant and the application

1.1 The applicant is AUTU GROUP, a company registered in Australia with ABN 75 614 927 883, which carries on business in Melbourne as a supplier and installer of garage doors under the trading name TUSMART DOORS. TUSMART DOORS is a trading name and not a separate legal entity; our contracts, invoices and import documentation for the goods are made out in the name of AUTU GROUP. We refer to the applicant in this document as AUTU GROUP.

1.2 AUTU GROUP imports complete aluminium garage door systems manufactured in China by MIDI Door Industry and installs them in Melbourne, in small numbers - in the order of 5 to 10 units per year - each made to order for an identified site. We hold no stock. The goods are purchased by us and sold in Australia by us, and we bear the cost of importation and the commercial risk of sale. We are not the importer of record on the entries; the position on the customs value of the goods is a matter for the party which lodges them and for the Australian Border Force. The sea freight for each shipment is invoiced to AUTU GROUP, which paid that freight, and the freight invoices are provided at Annex C.

1.3 We ask the Commission to grant an exemption from the measures in Investigation 691 under Part XVB of the Customs Act 1901 and sections 8(7)(a) and 10(8)(a) of the Customs Tariff (Anti-Dumping) Act 1975. In the alternative, we ask the Commission to exclude complete aluminium garage door systems from the description of the goods under consideration in the Final Report, in the same way as curtain wall products. Failing both, we ask that the rate be determined by reference to MIDI Door Industry's own export prices, and that MIDI Door Industry be given the opportunity to provide the information necessary to support that outcome, which it is willing to do.

1.4 SEF 691 at section 3.7 records six exemption applications received during this investigation - CGT Law, Jolong, Broad, Ironside Construction, Empire Windows and Altop - which the Commission will consider in preparing the Final Report, having invited the applicants to comment on them on the public record. We ask that this application be dealt with on the same basis and determined in the Final Report, and that it be examined concurrently with the investigation, as the Commission has done with the other applications on the public record. It is made without prejudice to, and supplements, our submission in response to SEF 691 lodged on the same date.

2. The goods

2.1 The goods the subject of this application are as follows:

Manufacturer	MIDI Door Industry, China
Product	Complete aluminium garage door system, made to order (sectional and tilt)
Principal components	Aluminium frame and leaf; infill of aluminium louvre/grille, flat aluminium panel or glazing; electric motor; tracks and rollers; counterbalance and springs; steel mounting hardware, hinges and fixings
Width / Height	3,005 - 5,200 mm wide / 2,400 - 2,750 mm high. Four doors in two orders; the individual openings are listed in Annex A.
Supply form	Complete operating system, assembled and tested in China and supplied with motor, tracks, counterbalance and steel mounting hardware. Ex works China.
End use	Vehicle access to private garages, carports and sheds (non-habitable structures)
Annual volume / tariff	In the order of 5 - 10 units per year, made to order. Classified by our customs broker under tariff subheading 7610.10.00 (statistical code 12)

2.2 This application is supported by the import documentation for the goods (Annex C), the manufacturer's proforma invoice (Annex B), and photographic records of the goods as delivered and as installed on site (Annex A). We confine the grounds below to what that evidence supports.

3. Ground one: the goods do not answer the description of the goods under consideration

- 3.1** The goods under consideration are described as aluminium windows and doors, whether fully or partially assembled, including their frames, panels and sashes, with or without glass, and excluding curtain wall products. That description has a single physical logic: a framed assembly set into a building opening, comprising a frame, a sash or panel and associated hardware, separating the interior of a habitable building from the outdoor environment. The applicants framed their product in those terms and the Commission adopted that framing in SEF 691.
- 3.2** Complete aluminium garage door systems do not answer that description. They have no sashes and no threshold; their infill is a louvre, a flat panel or glazing, none of which is a glazing unit installed to seal a habitable opening against wind, air and water. They are not set into a building opening at all. They run on tracks, and they are supplied as a complete operating assembly with the motor, counterbalance and steel mounting hardware that make them work as vehicle access doors. The manufacturer's proforma invoice lists that hardware item by item - tracks, hinges, torsion spring, solid shaft, rubber seal, rollers, bearing brackets and 304 stainless wire rope - and the installation photographs show the assembled system in place.
- 3.3** The end use served confirms the point. In SEF 691 the Commission used the National Construction Code classifications to describe end use, and at Table 11 recorded Class 10 - non-habitable structures, namely sheds, carports and private garages - as "Not within scope of this investigation". The goods in this application are the access doors of exactly those Class 10 structures. Where a garage is attached to a dwelling and its door treated as part of a Class 1a envelope, the end use point is weaker and the physical points at 3.2 carry the weight.
- 3.4** The exclusion of curtain wall shows how the description operates: it draws a line around products forming part of a building envelope, by reference to the physical and functional character of the product. A garage door system shares none of the defining characteristics of the goods. Consistent with SEF 691 section 3.9, we do not argue that these goods fall outside the description because of the standard to which they are tested; we argue it on their character and their function.

4. Ground two: the applicants produce no like goods

- 4.1** The applicants are Ventora Group Pty Ltd and the Australian Glass and Window Association. The industry comprising them is defined in SEF 691 at section 4.3 as producers of architectural windows and pedestrian door systems. No applicant manufactures garage door systems. Section 269T(1) of the Customs Act 1901 requires like goods to be identical or closely resembling in characteristics, assessed under chapter 2 of the Dumping and Subsidy Manual for physical, commercial, functional and production likeness. The goods in this application share none of the four: different materials and different part, a different function, a different customer and channel, and they are not made by the applicants or anyone else in their industry. An exemption would therefore take nothing from the protection the applicants sought: they would continue to receive full protection for architectural windows and doors, and would not receive a measure extending to a product they do not make, do not sell, and against which no injury is claimed. This is the position the Commission itself accepted in declining to publish a dumping duty notice in respect of Altop.

5. Ground three: the imports are immaterial

- 5.1** SEF 691 finds losses to the Australian industry of A\$422.6 million (A\$350 million in price undercutting and A\$72.6 million in forgone sales) against an Australian AWD market valued at A\$2.8 billion, with China accounting for over 87 per cent of imports. The causation findings rest on the applicants' own evidence of project-level tenders lost on price to Chinese suppliers of architectural windows and doors. Our imports are made to order for identified sites and run at approximately 5 to 10 units per year. They are evidenced by our purchase and installation records, which identify each unit by site and date and are indexed at Annex A, together with the sea freight invoices for each shipment. Against a market of that scale, and against the tender-level evidence the applicants rely on, our volume is immaterial and cannot have contributed to the injury found.

6. Ground four: in the further alternative, a rate determined for MIDI Door Industry

- 6.1** If the goods are found to be within the description, we ask that the rate be determined by reference to MIDI Door Industry's own export prices rather than the residual rate of 24.4 per cent or the 70.4 per cent rate applicable to uncooperative exporters. Neither reflects the conduct of this importer, which has responded to the Commission's enquiries, supplied product and cost information and provided the evidence annexed to this application.
- 6.2** MIDI Door Industry was not selected for examination and has not had the benefit of an individual rate. It is willing to participate and to provide the export price and cost data necessary for a rate to be determined on its own verified export prices. We ask that the Commission invite it to do so, and that the Final Report preserve the availability of an accelerated review for that exporter as the Commission did in the aluminium extrusions matter. If a floor price method is adopted, we ask that the floor price be determined by reference to the exporter's actual export prices and the cost of the complete system as supplied, including motor, tracks, counterbalance and steel mounting hardware.

7. Evidence

- 7.1** The following is annexed, and further material can be provided on request. We will make our personnel, records and premises available to the Commission or its contractors if the Commission wishes to verify any of it.

Annex A - Index of the aluminium garage door systems we have imported and installed, identifying each unit by site, date and size, together with photographs of the goods as delivered and of the installations completed (confidential).

Annex B - Manufacturer information for MIDI Door Industry and the manufacturer's proforma invoice for the goods purchased, including the itemised specification of motor, tracks, counterbalance and steel mounting hardware (confidential).

Annex C - The sea freight invoice for the shipment, addressed to AUTU GROUP as the customer for that freight, together with our statement at section 7.3 as to the customs entry documentation (confidential).

7.2 Two categories of material referred to in earlier correspondence are not in our possession and are not relied on: product test documentation to AS/NZS 4505, and material on the Australian garage door industry. We will provide either if the Commission requires it for the purposes of the Final Report. 7.3

7.3 We do not hold the customs entry documentation for our importations. We are not the importer of record on those entries. They are lodged by the freight forwarder acting on our instructions, and the entry documentation is held by that party. We say so rather than annex documents we do not hold. We have asked that party to provide the entry documentation to the Commission, and we will assist in any way required. The description of the goods, the tariff classification and the value on which any measure is to be calculated are matters for that party and for the Australian Border Force, and we make no submission in this investigation as to those matters.

8. Requests

8.1 The Commission is respectfully asked to:

- (a) grant an exemption from the interim and final dumping and countervailing duty measures in Investigation 691 in respect of the complete aluminium garage door systems described at section 2;
- (b) in the alternative, exclude complete aluminium garage door systems from the description of the goods under consideration in the Final Report, in the same way as curtain wall products;
- (c) in the further alternative, determine the rate by reference to MIDI Door Industry's own verified export prices, and invite that exporter to provide the information necessary to do so;
- (d) treat this application in the same manner as the exemption applications recorded at section 3.7 of SEF 691, and invite the applicants and other interested parties to comment; and
- (e) confirm in writing whether the application is accepted for consideration in the preparation of the Final Report, and if it is not, identify the further information required.

8.2 We would be grateful for confirmation of receipt, and welcome the opportunity to provide any clarification the Commission requires.

We declare that the information in this application is complete and correct to the best of our knowledge.

Yours faithfully,

YUN LING

Director, AUTU GROUP trading as TUSMART DOORS

22 October 2026

Enclosures

Annex A - Photographs of goods and installation records (confidential version marked OFFICIAL: Sensitive; non-confidential summary marked PUBLIC RECORD)

Annex B - Manufacturer information and proforma invoice (confidential version marked OFFICIAL: Sensitive; non-confidential summary marked PUBLIC RECORD)

Annex C - Sea freight invoice for the shipment (confidential version marked OFFICIAL: Sensitive; non-confidential summary marked PUBLIC RECORD)

Each annex containing commercially sensitive information has been lodged in a confidential version marked OFFICIAL: Sensitive, together with a non-confidential summary of that annex marked PUBLIC RECORD, in accordance with section 269ZJ of the Customs Act 1901.

Separate: submission in response to SEF 691, lodged 22 October 2026

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NON-CONFIDENTIAL - FOR PUBLIC RECORD**ANNEX A - INDEX OF ALUMINIUM GARAGE DOORS IMPORTED AND INSTALLED**

Investigation No. 691 - Aluminium windows and doors exported from the People's Republic of China

AUTU GROUP trading as TUSMART DOORS | 22 October 2026

1. This index identifies each aluminium garage door system that AUTU GROUP trading as TUSMART DOORS has imported into Australia from the People's Republic of China and installed. It is provided to support the statement in section 5.1 of our application that the volume of the goods concerned is immaterial. Each line identifies one door.

No.	Import batch / purchase doc. date	Client	Site (suburb)	Opening width x height (mm)	Door type / method of installation	Opener	Import documentation	Photo ref.
1	Batch A / 17/10/2025	Lincoln Built Pty Ltd	Murrumbeena	3005 x 2700	Aluminium batten sectional / Internal install, single track	Included	Proforma invoice on file (Annex B); sea freight invoice on file (Annex C).	D01
2	Batch A / 17/10/2025	Lincoln Built Pty Ltd	Murrumbeena	4990 x 2750	Aluminium batten sectional / Internal install, single track	Included	Proforma invoice on file (Annex B); sea freight invoice on file (Annex C).	D02
3	Batch A / 17/10/2025	Lincoln Built Pty Ltd	Murrumbeena	4820 x 2400	Aluminium batten sectional / Internal install, double track	Included	Proforma invoice on file (Annex B); sea freight invoice on file (Annex C).	D03
4	Batch B / 28/07/2025	Benz New Home Pty Ltd	Glen Iris	5120 x 2410	Aluminium batten sectional / Internal install, single track	Included	No import documentation located for this consignment.	D04

Total: 4 aluminium garage door systems in 2 import consignments. Every door listed above is supplied with the motor, track, hardware and springs specified in the relevant proforma invoice. Items 1 to 3 are oak woodgrain aluminium batten sectional doors installed for one client; item 4 is a sand black aluminium batten sectional door installed for another.

2. This index covers only aluminium garage door systems imported from the People's Republic of China and installed by us. Doors supplied by Australian manufacturers, and roller doors, are outside the scope of this index.

3. Site addresses are given at suburb level only, because these sites are private residences.

4. We do not hold the customs entry documentation for any of these importations. AUTU GROUP is not the importer of record on those entries. They are lodged by the freight forwarder acting on our instructions, and the entry documentation is held by that party. We have asked that party to provide the entry documentation to the Commission, and we will assist in any way required. Annex C contains the sea freight invoice for the consignment comprising items 1 to 3, which evidences that those goods were moved from China into Australia and that the party to whom they were sold is AUTU GROUP.

5. Photo references correspond to the photographs annexed to the confidential version of Annex A.

YUN LING | Director, AUTU GROUP trading as TUSMART DOORS | 22 October 2026

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PUBLIC RECORD**ANNEX B - MANUFACTURER'S PROFORMA INVOICES - NON-CONFIDENTIAL SUMMARY**

Investigation No. 691 - Aluminium windows and doors exported from the People's Republic of China

AUTU GROUP trading as TUSMART DOORS | 22 October 2026

1. This is the non-confidential summary of Annex B to our application for exemption, and to our submission in response to SEF 691. The confidential version of Annex B, which contains the manufacturer's proforma invoices in full, has been lodged with the Commission and is marked OFFICIAL: Sensitive. This summary is provided for inclusion in the public record, in accordance with section 269ZJ of the Customs Act 1901. Where information has been withheld, the withheld content is shown in square brackets.

2. Annex B contains the manufacturer's proforma invoices for the two consignments of complete aluminium garage door systems described in section 2 of our application. Both invoices are issued by MIDI Door Industry (the manufacturer) and are made out to AUTU GROUP. They are the purchase documents for the goods identified in the index at Annex A.

3. The following particulars are taken from those invoices. The invoices are scanned documents; the particulars below are those on the face of the invoices.

Item	Particular	Detail
B-1	Manufacturer	MIDI Door Industry, People's Republic of China.
B-2	Invoices	Two proforma invoices. GSM251017 for three aluminium oak woodgrain batten sectional doors (invoice number and date as shown on the invoice). GSM250730 for one aluminium sand black batten sectional door (invoice number and date as shown on the invoice).
B-3	Goods	Aluminium frame with aluminium louvre (batten) infill, supplied as a complete sectional garage door system. Panel thickness 80 mm (three-door invoice) and 60 mm (one-door invoice). Aluminium frame 3.0 mm thick. Batten 40 x 20 mm, 1.8 mm thick. Glass louvre infill and flat aluminium infill are also available within the same description.
B-4	Opening dimensions	Three-door invoice: 3,005 x 2,700 mm; 4,990 x 2,750 mm; 4,820 x 2,400 mm. One-door invoice: 5,120 x 2,410 mm. Each door is made to order for an identified site.
B-5	Installation method	Internal installation. The three-door invoice specifies single track for two doors and double track for the third. The one-door invoice specifies single track.
B-6	Hardware supplied with each door	Each line of the invoices itemises, separately from the door panel: installation hardware (galvanised steel tracks, hinges, torsion springs, solid shaft, rubber seal, rollers, bearing brackets and 304 stainless steel cable), an electric motor, and a plywood export box. The three-door invoice also itemises decorative aluminium cladding for outwall use, and domestic delivery to the manufacturer's warehouse in Guangzhou. The invoices therefore show the goods purchased to be complete operating systems and not components for assembly in Australia.
B-7	Export packing	Each door is packed in a plywood box. The three-door invoice specifies boxes of 3,600 x 800 x 750 mm (495 kg), 5,600 x 800 x 750 mm (630 kg) and 5,450 x 750 x 750 mm (580 kg). The one-door invoice specifies a box of 5,400 x 850 x 800 mm (690 kg).
B-8	Trade terms and currency	Ex works, plus local domestic delivery to the manufacturer's warehouse in Guangzhou, as stated in the notes to the one-door invoice. All amounts are stated in RMB. The amounts, unit prices and the aggregate for each invoice are commercially sensitive and are set out in the confidential version of this annex [prices withheld - see confidential version].
B-9	Motor	Each line of the invoices includes an electric motor. The make and model of the motor supplied with the three-door invoice is withheld from the public record [motor model withheld]; the one-door invoice states the motor by value only. The motor is supplied with the door and is not purchased separately in Australia.
B-10	Production lead time	Approximately 30 days from confirmation of the order, as stated in the notes to both invoices.

B-11	Other particulars	Neither invoice contains a street address, telephone number or email address for either party. The one-door invoice identifies the site to which the goods are to be delivered by street address [street address withheld]; the suburb is Glen Iris, Victoria. The three-door invoice identifies the site by street address [street address withheld]; the suburb is Murrumbeena, Victoria.
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4. We have not included in the public record the purchase price of the goods, the unit prices, the make and model of the electric motor, or the street addresses of the delivery sites. The first three are commercially sensitive. The street addresses are the addresses of private residences. The confidential version of Annex B, which has been lodged separately, contains that information in full.

5. The two invoices are the purchase documents for the goods identified at Annex A. Annex A identifies each door by the client for whom it was supplied, the suburb of the site, the opening dimensions, the date of the purchase document and the export packing reference, and the photographs at Annex A correspond to those four doors.

6. We confirm that the information in this summary is consistent with the confidential version of Annex B.

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PUBLIC RECORD
ANNEX C - IMPORT DOCUMENTATION - NON-CONFIDENTIAL SUMMARY

Investigation No. 691 - Aluminium windows and doors exported from the People's Republic of China
AUTU GROUP trading as TUSMART DOORS | 22 October 2026

1. This is the non-confidential summary of Annex C to our application for exemption, and to our submission in response to SEF 691. The confidential version of Annex C has been lodged with the Commission and is marked OFFICIAL: Sensitive. This summary is provided for inclusion in the public record, in accordance with section 269ZJ of the Customs Act 1901. Where information has been withheld, the withheld content is shown in square brackets.
2. Annex C concerns the importation of the aluminium garage door systems described in section 2 of our application. Annex C comprises a single document:

C-1	Tax invoice of the Australian freight forwarder for the sea freight movement of the goods in this importation, addressed to AUTU GROUP as the customer for that freight, together with the invoice number, date, amount and payment status. A redacted copy is attached.	The residential street address and the personal email address shown in the invoice-to block have been redacted as [address withheld] and [contact email withheld]. The name, ABN, invoice number, date, amounts and payment status of the freight invoice are unredacted and are visible in the attached copy.
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3. The document at C-1 is the document on which we rely to establish that the goods in question were moved from China into Australia, and that the party to whom the goods were sold is AUTU GROUP. The invoice is issued to AUTU GROUP as the customer for the freight and was paid by AUTU GROUP.
4. We do not hold the customs entry documentation for our importations. We are not the importer of record on those entries. They are lodged by the freight forwarder acting on our instructions, and the entry documentation is held by that party. We have asked that party to provide the entry documentation to the Commission, and we will assist in any way required. The description of the goods, the tariff classification and the value on which any measure is to be calculated are matters for that party and for the Australian Border Force, and we make no submission in this investigation as to those matters.
5. We have not included in the public record the purchase price of the goods or the freight amount shown on the freight invoice. Those are commercially sensitive. The confidential version of Annex C, which has been lodged separately, contains that information in full.
6. We confirm that the information in this summary is consistent with the confidential version of Annex C, and that the redacted material has been redacted in a manner that does not distort the meaning of the document.

YUN LING | Director, AUTU GROUP trading as TUSMART DOORS | 22 October 2026