SUBMISSION IN RESPONSE TO THE STATEMENT OF ESSENTIAL FACTS

Case Number: INV/SEF 691

Goods: Aluminium windows and doors (AWD)

Countries involved: People's Republic of China

Submitting party: Qingdao Leixin Decoration Co., Ltd.

Role: Exporter (People's Republic of China)

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1. Introduction

Qingdao Leixin Decoration Co., Ltd. (‘Leixin’) is a manufacturer of aluminium windows and doors based in China, established in 2004. The Company respectfully submits its response to the Statement of Essential Facts No. 691 ("SEF") published on 14 October 2026 concerning the alleged dumping and subsidisation of aluminium windows and doors ("AWD") exported from the People's Republic of China to Australia.

Leixin participated in this investigation from its outset. The Company lodged its Preliminary Information Request ("PIR") response within the prescribed deadline, and promptly provided supplementary spreadsheet information upon request. Leixin has at all times maintained a cooperative and transparent attitude toward the Commission and is committed to providing any further information required.

The Company notes that it is currently classified as an "all other" exporter, resulting in the application of a combined duty rate of 73.3%. As a small manufacturer with limited resources, this rate would have a severe and disproportionate impact on the Company's ability to continue exporting to the Australian market. The Company respectfully submits the following observations and requests for the Commission's consideration.

2. Procedural Submissions

2.1 Classification as a residual cooperating exporter

Leixin respectfully requests that the Commission reconsider its classification of the Company as an "all other" exporter and treat Leixin as a residual cooperating exporter.

We note that other PIR respondents in this investigation, including exporters whose conduct during the investigation period was materially similar to Leixin's, have been classified as residual cooperating exporters. Leixin submitted its PIR on time, provided the supplementary worksheet in full, and has consistently engaged with the Commission throughout the process. The absence of exports during the specific investigation period (1 July 2024 to 30 June 2025) was a matter of order timing — Leixin simply did not

receive Australian orders during that period — and does not reflect any unwillingness to cooperate or any withdrawal from the Australian market.

Leixin respectfully submits that its conduct is materially indistinguishable from that of other PIR respondents who have been classified as residual cooperating exporters, and that consistency of treatment requires that Leixin be placed in the same category.

2.2 The "all other" rate is not derived from verified data specific to Leixin

The Company notes that the "all other" rate has been derived from the weighted average of margins established for selected exporters, and is not based on any verified data specific to Leixin. As a small manufacturer with its own cost structure, product mix and customer base, applying a rate derived from selected exporters — whose export volumes, product specifications and business models differ significantly from Leixin's — does not reflect the Company's actual dumping margin.

Leixin respectfully requests that, if the Commission considers the Company's products within the scope of the investigation, the Company's actual transaction data and cost information be taken into account in determining any applicable rate, rather than mechanically applying the "all other" rate.

3. Substantive Submissions

3.1 Raw materials are sourced from the open market

Leixin sources all of its raw materials — including aluminium profiles, glass and hardware — from privately-owned domestic suppliers in China. The Company is not affiliated with any state-owned enterprise, and none of its suppliers are state-owned. All purchases are made at prevailing market prices on ordinary commercial terms.

The Company has not received any grant or preferential treatment in connection with its production or exports.

3.2 The "particular market situation" conclusion should be reconsidered

The SEF concludes that a particular market situation exists in China with respect to aluminium raw materials, justifying the rejection of domestic cost data in the normal value determination. Leixin respectfully submits that this conclusion should be reconsidered.

The Company buys aluminium profiles in the open market from multiple competing suppliers. The price Leixin pays reflects ordinary commercial supply and demand, not any distorted or government-controlled pricing mechanism. As a small purchaser, Leixin has no ability to influence or access preferential pricing, and its cost structure is representative of any small aluminium window and door manufacturer purchasing from the open market.

3.3 No exports during the investigation period = no injury caused by Leixin

Leixin notes that, during the investigation period (1 July 2024 to 30 June 2025), the Company did not export any aluminium windows and doors to Australia. Accordingly, Leixin's products did not compete with, or cause injury to, the Australian domestic industry during that period.

The absence of exports during the investigation period was purely a commercial matter of order timing. Leixin had exported to Australia in the most recent completed calendar year prior to the investigation period, and has resumed exports to Australia since the end of the investigation period. The Company regards Australia as an important market for its business.

3.4 Chinese AWD are not selected solely on price

We submit that Australian importers and end-users do not choose Chinese aluminium windows and doors solely on the basis of price. The decision to source from China is driven by a range of factors, including:

- **Product diversity and customisation:** Chinese manufacturers offer a wide range of product types, configurations, finishes and hardware options, and can customise products to meet specific Australian project requirements.
- **Performance specifications:** Chinese AWD are manufactured to meet Australian standards (including AS2047) and energy efficiency requirements, and perform comparably to locally manufactured products.
- **Design and aesthetics:** Chinese manufacturers offer contemporary design options that appeal to Australian residential and commercial projects.
- **Lead times and availability:** The ability to source products within project-critical timeframes, particularly for specialised or custom orders, is an important consideration.
- **Manufacturing flexibility:** Chinese manufacturers can accommodate smaller-batch or custom orders that some local producers are unwilling or unable to fulfil.

The choice of Chinese AWD reflects genuine product competitiveness across multiple dimensions, not simply price undercutting.

3.5 Downstream consequences of the proposed duty rate

Leixin respectfully wishes to bring the Commission's attention to the downstream impact of the proposed duty measures.

The Australian aluminium window and door industry includes not only manufacturers but also a large and diverse downstream ecosystem of importers, suppliers, installers, glaziers, builders and property developers. This downstream ecosystem employs a significantly larger workforce than the manufacturing segment alone.

A high duty rate on imported AWD would not simply shift demand from Chinese imports to local manufacturers. It would:

- Increase the cost of windows and doors for Australian builders and homeowners, at a time when the residential construction market is already under pressure.
- Constrict the range of product options available to builders and end-users, particularly for custom, specialised or smaller-volume projects.
- Affect the viability of downstream businesses — including small importers and installers — that rely on access to competitively priced imported products.

Additionally, the Australian domestic manufacturing sector already operates at near-full capacity. Local production lead times for custom projects are substantially longer than lead times through established import channels. A sudden reduction in imports would not be immediately offset by increased local production, and would instead result in project delays, supply shortages and increased costs across the construction sector.

4. Accelerated Review

Leixin notes that the Commission has indicated that exporters which did not export the goods during the investigation period may be eligible to apply for an accelerated review following any final decision to impose measures. Leixin formally registers its strong interest in applying for an accelerated review, based on its export activity to Australia both before and after the investigation period.

As a small manufacturer, the outcome of this investigation has a direct and significant impact on Leixin's business. The Company is eager to have its individual circumstances assessed through the accelerated review process and is prepared to provide all information required.

Yours sincerely,

Zhuo Wang
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Qingdao Leixin Decoration Co., Ltd.