Submission in Response to the Statement of Essential Facts

Shanghai Langtong Industrial Co., Ltd

PUBLIC RECORD — NON-CONFIDENTIAL

To: Commissioner, Australian Trade Remedies Commission
By email: Investigations1@atrc.gov.au
Date: 26 October 2026
Goods: Aluminium windows and doors exported from China
Submitted by: Shanghai Langtong Industrial Co., Ltd, manufacturer
Contact: Angela Zhou (Jiayi Zhou), Export Manager
Email: angela.zhou@gade-hardware.com
Address: No. 1 Baxiu West Road, Songjiang District, Shanghai, China

Telephone: China +86 186 2111 9877 | Australia +61 432 788 126

1 Purpose and requests

We submit this response to the Statement of Essential Facts in Investigation 691. We ask the Commissioner to consider our circumstances and the supporting information described below before making the final report to the Minister.

In particular, we request reconsideration of the treatment of Shanghai Langtong Industrial Co., Ltd (Langtong) within the uncooperative and all other exporters category. We ask whether, to the extent legally and procedurally available, our late information and present cooperation can support residual exporter treatment or another appropriate assessment. We recognize that submitting this response does not itself establish entitlement to either treatment.

2 Manufacturer and export agent

Langtong is the actual seller and manufacturer of the goods. Shanghai East Best Foreign Trade Co., Ltd (East Best) is a separate company engaged as our export agent to handle the receipt and settlement of foreign-currency payments and customs declarations. East Best is not an alternative name for Langtong and is not owned by Angela Zhou.

During the investigation period, 1 July 2024 to 30 June 2025, the invoices, packing lists, bills of lading and certificates of origin for our exports to Australia identified East Best as the exporter. The certificates of origin identified Shanghai Langtong as the manufacturer. We ask that these documents be read together so that the goods manufactured and sold by Langtong are correctly identified.

We understand from the Commission's correspondence that the manufacturer's treatment is relevant to the applicable securities. Our request concerns Langtong's own treatment and the accurate identification of its historical exports.

3 Participation and chronology

We acknowledge that the deadline for PIR responses has passed and that the Commission has advised us that Langtong is neither a selected nor a residual exporter. We now respond through the submission process identified in the Commission's correspondence.

In December 2025, we learned from an Australian customer that the Commission had commenced an investigation into aluminium windows and doors from China. Our understanding at that time was that several factories with larger export volumes would be selected for examination and that other exporters would await the outcome. We were not aware that exporters wishing to participate needed to submit a

Potential Interested Party Registration (PIR) form through the publicly available process. We regret that we misunderstood the participation requirements and missed the deadline.

On 14 October 2026, we became aware of the findings set out in the SEF. We respectfully ask for an opportunity to provide information concerning Langtong. We are willing to provide all records requested by the Commission and cooperate fully with any examination or verification that remains available.

We acknowledge that the investigation and participation deadlines were publicly notified. We do not suggest that the absence of direct correspondence alone removes the obligation to participate. We ask the Commission to consider the documented reasons for our late participation together with our present willingness to provide records and submit to verification.

4 Comments on classification and assessment

This submission addresses SEF sections 6.11 and 6.12 (pp. 150–153), section 7.12 (pp. 164–166), and the proposed measures in section 12.4 (p. 215). These references concern residual treatment, treatment of uncooperative entities and the resulting proposed rates.

We ask the Commission to consider whether reliable Langtong-specific information can still be accepted and used in assessing our treatment before the final report. If residual treatment is unavailable, please identify the legal or procedural obstacle and whether any other assessment is available within this investigation.

We are prepared to provide transaction-level export sales, domestic sales where applicable, production and cost records, financial information and records relevant to subsidy programs, subject to appropriate confidentiality treatment. Langtong has not received any government subsidies and has never applied for any government subsidies. We are willing to provide supporting records and cooperate with the Commission in verifying this statement.

We are willing to complete an Exporter Questionnaire and cooperate with verification. Please advise promptly whether such material can still be considered, the required scope and the deadline. We recognize the Commission's statutory timetable and do not assume that a complete individual examination remains practicable.

5 Products supplied to Australia and supporting evidence

We have worked with a local window manufacturer in Canberra to design and develop a high-performance window system for the Australian market.

The Canberra manufacturer funded all aluminium extrusion dies for this system through Langtong, with the dies manufactured by Nanping Aluminium in China. These particular dies are not available for purchase in Australia. The Australian manufacturer owns all intellectual property rights in the system.

Langtong purchases the aluminium extrusions produced by Nanping Aluminium for this system, together with glass, hardware and other necessary components sourced in China. We assemble these materials into finished aluminium windows and supply them to our manufacturing partner in Canberra.

Langtong is also willing to cooperate with the Commission by providing complete itemised breakdowns of purchase costs for the investigation period for aluminium extrusions purchased from Nanping Aluminium, glass purchased from Shanghai Jiacheng Glass, and hardware purchased from SIEGENIA, together with supporting documents as requested.

Based on our product performance information, we consider that this system achieves U-values better than those commonly available in the Australian market and performance consistent with passive-house applications when appropriately configured. It is designed to improve thermal comfort during Canberra's cold winters. We are willing to provide the relevant technical data and configuration details for verification. We do not present these statements as certification of a complete building or as a claim that every Australian-made window has inferior performance.

Three-dimensional renderings of our products can be provided separately on a confidential basis. They illustrate the design; the performance claims should be assessed by reference to the relevant technical evidence.

We also export other existing aluminium window systems to Australia. Although their thermal performance is below that of the jointly developed system, we consider it to be above the average performance available in the Australian market. We are willing to provide product-specific information so that these comparisons can be assessed on a consistent basis.

We consider our export prices to be above the average Chinese industry export price. We are willing to provide all export sales data and supporting documents so that the Commission can examine our actual transactions and, where relevant, compare like products on an appropriately adjusted basis.

On this basis, we believe that our actual sales warrant examination before dumping treatment is applied to Langtong. We respectfully ask the Commission to assess our sales and cost information. We recognise that a comparison with average export prices alone does not establish the absence of dumping.

6 Australian business relationships

Since beginning our cooperation with local window and door manufacturers in Canberra approximately ten years ago, Langtong has focused on producing premium, energy-efficient, high-performance aluminium windows and doors that meet applicable Australian Standards. This long-term commitment has guided our product development and our work with Australian manufacturing partners.

Our windows and doors have been supplied for high-end apartment developments in Canberra, including Dominion Residences and Illume. Dominion Residences won the HIA ACT/Southern NSW Region Apartment Complex award. Illume received a Commendation for Residential Architecture – Multiple Housing at the 2024 ACT Architecture Awards. These honours recognise the completed developments as a whole. Our involvement in these projects demonstrates our experience in supplying the premium residential market and supports our view that Australian project partners value the quality and performance of our products.

Based on discussions with our Australian manufacturing partners, some of the specifications we supply are outside their present manufacturing capabilities. We consider that our project-specific combinations of thermal performance, design and detailing are not readily interchangeable with standard products available locally. We are willing to provide technical comparisons and statements from our Australian partners to support this position and explain the practical difficulties of substituting alternative systems on the relevant projects.

The commercial effects on existing projects and Australian partners can be supported by specific evidence of orders, commitments and available alternatives. We recognize that these effects alone do not determine whether goods are dumped, subsidized or causing injury.

We do not rely on a general comparison with average Australian market prices as proof of an absence of dumping. Any pricing material provided will identify product specifications, quantities, delivery terms and relevant adjustments, so that its relevance can be assessed.

7 Requested next steps

We respectfully request that the Commission consider this submission and its supporting evidence in the final report; advise whether any further information can be accepted to reconsider Langtong's classification or assessment; and explain the basis for the treatment ultimately applied to Langtong.

Please confirm receipt and advise promptly of any deficiencies in the submission or its public version that we can remedy. We remain available to answer questions and provide further material within a specified timetable.

Yours faithfully,

Jiayi Zhou

Angela Zhou (Jiayi Zhou)
Export Manager
For and on behalf of Shanghai Langtong Industrial Co., Ltd
26 October 2026

Supporting documents available on request

The following supporting documents can be provided separately, subject to appropriate confidentiality treatment:

A1 A sample shipment from 1 July 2024 to 30 June 2025: invoice, packing list, bill of lading and certificate of origin. Complete shipping records for the period can be provided if requested.

A2 Three-dimensional product renderings.

A3 PIR form and accompanying Excel workbook.

We request confidential treatment for commercial transaction details and non-public product designs because disclosure could reveal commercially sensitive information. Where confidential material is submitted, a corresponding non-confidential summary will identify the period, the parties' roles and the general nature of the products and information without disclosing sensitive details.