Guangzhou Senhai Building Materials Imp. & Exp. Co., Ltd.

Room 201, Building 6, No. 86 Science and Innovation Park, No. 21, First Industrial 7th Street, Xiecun, Zhongcun Subdistrict, Panyu District, Guangzhou, Guangdong Province, China

SUBMISSION IN RESPONSE TO THE STATEMENT OF ESSENTIAL FACTS

Investigation No. 691 – Aluminium Windows and Doors from the People's Republic of China

Submitted by: Guangzhou Senhai Building Materials Import and Export Co., Ltd.

Date: 27 October 2026

Document Status: PUBLIC RECORD VERSION

1. Introduction

Guangzhou Senhai Building Materials Import and Export Co., Ltd. ("Senhai") respectfully submits this response to the Statement of Essential Facts (SEF) issued on 14 October 2026 in relation to Investigation No. 691.

Senhai is a newly established Chinese trading company intending to export aluminium windows and doors to Australia.

The purpose of this submission is to provide the Commission with relevant information concerning Senhai's incorporation, business activities and proposed export arrangements, and to seek clarification of its treatment under the investigation and any subsequent measures.

2. Company Background

Senhai was incorporated in Guangzhou, Guangdong Province, People's Republic of China, on 21 July 2026.

The company was established after the investigation period of 1 July 2024 to 30 June 2025.

Accordingly, Senhai did not exist during the investigation period and did not undertake any exports of the goods under consideration during that period.

Senhai operates as a trading company and does not manufacture aluminium windows and doors.

3. Current Business Activities

Since its incorporation, Senhai has been engaged in domestic trading and supply activities

involving aluminium windows and doors manufactured to Australian specifications.

The company sources finished products from manufacturers in China.

Its commercial arrangements are non-exclusive. Senhai may purchase goods from alternative manufacturers, and its suppliers may supply products to other customers.

As at 27 October 2026, Senhai has not directly exported aluminium windows and doors to Australia under its own name.

The company intends to develop direct export operations to the Australian market.

4. Manufacturing and Supply Arrangements

Senhai's proposed business model is to act as a trading intermediary purchasing finished aluminium windows and doors from Chinese manufacturers and arranging their sale to Australian customers.

The company does not own or operate a manufacturing facility for these goods.

Senhai understands that the identification of the relevant exporter and manufacturer, and the determination of applicable dumping and countervailing measures, must be undertaken in accordance with Australian legislation and the Commission's established procedures.

Senhai is willing to provide available information regarding its suppliers, procurement arrangements and relevant commercial transactions, as required.

5. Corporate Relationships and Historical Trading Activities

Senhai acknowledges that it is under common ultimate control with a separate Chinese trading entity involved in historical sales of aluminium windows and doors to Australian customers.

Senhai itself was not incorporated during the investigation period.

Senhai respectfully requests that the Commission clarify how its incorporation date, corporate relationships and the historical activities of related entities may affect the identification of the relevant exporter and its treatment under any measures arising from Investigation No. 691.

Further information concerning the relevant entities and their commercial activities can be provided through the appropriate confidential submission procedures, where required.

6. Exporter Classification and Applicable Measures

Senhai understands that its incorporation after the investigation period does not automatically entitle it to the residual exporter rate or to an individually determined rate.

As a trading company that has not yet directly exported the goods to Australia, Senhai seeks clarification as to how the Commission would identify the exporter for future transactions involving Senhai and its independent manufacturers.

In particular, Senhai seeks clarification as to whether the applicable measures would be determined by reference to the manufacturer, Senhai as the trading entity, or other relevant circumstances of the transaction.

7. Potential Accelerated Review

Senhai notes the Commission's correspondence dated 20 October 2026 regarding the potential availability of an accelerated review following the imposition of final measures.

Senhai acknowledges that the availability of such a review is subject to the relevant statutory requirements, including those concerning exporter identity, previous export activities and associations with other exporters.

Senhai respectfully requests clarification of the eligibility requirements and supporting documentation that would be necessary for a trading company in its circumstances to seek an individually determined rate.

8. Requests to the Commission

Senhai respectfully requests that the Commission:

Consider Senhai's establishment date, current business activities and proposed role in future exports of aluminium windows and doors to Australia.

Clarify the treatment of a newly incorporated Chinese trading company that did not exist during the investigation period and has not yet directly exported the goods to Australia.

Clarify how the relevant exporter would be identified where a trading company purchases finished goods from independent manufacturers for export to Australia.

Confirm the relevant procedures for determining the applicable measures for such future shipments.

Provide guidance regarding the potential availability of an accelerated review, including the implications of common control with a separate entity that undertook historical trading activities.

Advise whether any additional supporting documents or information would assist the Commission in considering these matters.

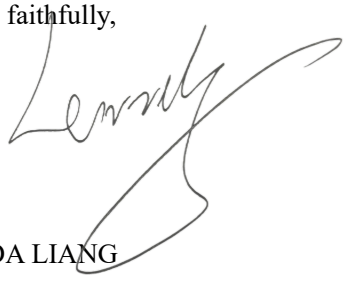
9. Conclusion

Senhai appreciates the Commission's consideration of this submission.

The company intends to conduct its future export operations in compliance with applicable Australian trade remedy measures and is willing to cooperate with reasonable information and verification requirements.

Senhai respectfully requests that the Commission provide guidance on the matters outlined above.

Yours faithfully,



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Proposed Supporting Attachment

Attachment 1 – Business Licence of Guangzhou Senhai Building Materials Import and Export Co., Ltd. (with English translation)