ROOMEYE

Zhejiang Roomeye Energy Saving Doors and Windows Technology Co., Ltd.
No. 328 Yixian Road, Fuxi Subdistrict, Deqing, Huzhou, Zhejiang, China

2 November 2026

The Commissioner
Australian Trade Remedies Commission
By email

Dear Commissioner

Investigation No. 691 – Aluminium windows and doors exported from the People's Republic of China
Submission in response to Statement of Essential Facts No. 691

Introduction

1. Zhejiang Roomeye Energy Saving Doors and Windows Technology Co., Ltd. (**Roomeye**) makes this submission in response to Statement of Essential Facts No. 691 dated 14 October 2026 (**SEF**).

2. This is the non-confidential version of Roomeye's submission, lodged for the public record. A confidential version, together with supporting attachments, has been provided to the Commission.

3. The SEF does not mention Roomeye. In the absence of a specific finding, Roomeye would fall within the category of "uncooperative and all other exporters", to which the SEF applies an effective rate of 73.3%. Roomeye submits that this category does not apply to it, for the reasons summarised below.

About Roomeye

4. Roomeye is a manufacturer of windows and doors located in Zhejiang Province, China. Its customers have mainly been in China. It produces premium products, sold on performance and design rather than price, across three product lines:

   (a) thermally broken system aluminium windows and doors;

   (b) aluminium-clad timber and aluminium-timber composite windows and doors made using Roomeye's own patented technology, together with solid timber and system aluminium windows and doors; and

   (c) sunrooms, panoramic and lift-and-slide systems.

5. Roomeye made its first shipment to Australia in August 2026.

No exports during the investigation period

6. Roomeye did not export any goods to Australia during the investigation period (1 July 2024 to 30 June 2025), directly or through any intermediary. No company related to Roomeye did so either.

7. Roomeye was not aware of the investigation when it was initiated on 25 November 2025 and had no reason to be, as it had not exported to Australia. On becoming aware of it, Roomeye promptly lodged a response to the preliminary information request (**PIR**) on 11

October 2026, before the SEF was published. The PIR response reports nil exports for the investigation period.

Roomeye is not an uncooperative exporter

8. Roomeye submits that it is not an "*uncooperative exporter*" or a "*non-cooperative entity*" within the meaning of the *Customs Act 1901* (Cth) (the **Act**). In summary:

   (a) having made no exports in the investigation period, Roomeye had no information relevant to the investigation to give, and did not significantly impede the investigation;

   (b) the Act defines three categories of exporter. An exporter whose exports were not examined, and which is not an uncooperative exporter, is a residual exporter. The Act does not create a category of "*all other exporters*";

   (c) the SEF itself treats exporters that responded to the PIR but were not selected for examination as residual exporters, and treats as non-cooperative only those entities that did not respond to the PIR. Roomeye has responded to the PIR;

   (d) the *Customs (Extensions of Time and Non-cooperation) Direction 2015* does not require Roomeye to be treated as uncooperative in these circumstances;

   (e) treating Roomeye as a residual exporter is consistent with the Commission's previous approach; and

   (f) Roomeye is a "*new exporter*" as defined in section 269T(1) of the Act, and the Act provides separately for new exporters.

9. Accordingly, Roomeye submits that it should be treated as a residual exporter and a residual entity, subject to the residual dumping margin of 24.4%. As the SEF found the residual subsidy margin of 0.7% to be negligible, no countervailing duty should apply to Roomeye.

Alternative submission on the uncooperative exporter rates

10. In the alternative, and without prejudice to the above, Roomeye submits that the dumping and subsidy margins proposed for uncooperative exporters and non-cooperative entities should be reconsidered. The proposed dumping margin compares the lowest verified export price of any selected exporter with the weighted average normal value of the selected exporters, exceeds every margin found on verified data in the investigation and does not take account of relevant information now before the Commission about Roomeye and its products. Roomeye asks the Commission instead to use the weighted average export price of the selected exporters, or at least to cap the margin at 51.6%, the highest margin found on verified data. Roomeye also notes that several of the subsidy programs relied on are limited to regions in which Roomeye is not located.

Products outside the goods description

11. Roomeye requests the Commission to confirm that the following products are not the goods under consideration:

   (a) aluminium-clad timber windows and doors, whose frames and sashes are made of laminated timber with external aluminium cladding;

   (b) solid timber windows and doors;

   (c) sunrooms, being complete glazed structures supplied as structures rather than as windows or doors; and

(d) frames, panels, sashes and assemblies that, as imported, exceed the size limits in the goods description.

12. Roomeye has provided the Commission with a list of the relevant models and illustrative photographs in the confidential version.

Requests for exemption

13. If the Commission considers that Roomeye's aluminium-clad timber windows and doors are within the goods description, Roomeye requests, in the alternative, that those products be considered for exemption under paragraphs 8(7)(a) and 10(8)(a) of the *Customs Tariff (Anti-Dumping) Act 1975*, on the basis that like or directly competitive goods are not "*offered for sale in Australia to all purchasers on equal terms under like conditions*". These products are made to Roomeye's patented construction, and are readily identifiable at the border. Roomeye can provide further technical information on request.

14. Roomeye also requests an exemption for its aluminium-timber composite windows and doors. These are premium, made-to-order products that combine an aluminium alloy exterior profile with a solid timber interior of Southeast Asian teak or North American oak, joined by Roomeye's patented aluminium-timber corner joint, and use hardware designed for timber windows. They are not volume products. Roomeye is not aware of any Australian manufacturer that makes aluminium-timber composite windows or doors with a solid teak interior to this specification. The products can be identified at the border by their visible solid timber interior and by model code. Product specifications are provided in the confidential version.

Findings sought

15. Roomeye respectfully requests that the final report:

(a) find that Roomeye is not an uncooperative exporter or a non-cooperative entity, and treat Roomeye as a residual exporter and residual entity, subject to the residual dumping margin of 24.4% and no countervailing duty;

(b) in the alternative, provide for new exporters to be treated at the residual rate, or reconsider the margins applied to uncooperative exporters and non-cooperative entities;

(c) confirm that Roomeye is a new exporter and did not refuse to cooperate with the investigation;

(d) confirm that the products identified above are not the goods under consideration;

(e) if necessary, consider Roomeye's alternative request for exemption of its aluminium-clad timber windows and doors; and

(f) consider Roomeye's request for an exemption for its aluminium-timber composite windows and doors.

Yours faithfully

Zhejiang Roomeye Energy Saving Doors and Windows Technology Co., Ltd.

Attachments provided to the Commission in confidence

Annexure A – Product photographs **[CONFIDENTIAL ATTACHMENT]**

Annexure B – Shipping document **[CONFIDENTIAL ATTACHMENT]**

Annexure C – Product specifications **[CONFIDENTIAL ATTACHMENT]**

Confidential material has been removed because its disclosure would reveal commercially sensitive information about Roomeye, its products and its customer, and would be of advantage to its competitors.