Sunny Window and Door Systems Pty Ltd
ABN: 69 694 946 542
Role: Australian importer and local supplier
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Investigation 691-Aluminium Windows and Doors Exported to Australia from the People's Republic of China
Submission in Response to the Statement of Essential Facts (SEF)

Dear Director and Investigation Team,

Sunny Window and Door Systems Pty Ltd submits this response to the Statement of Essential Facts (SEF) in Investigation 691.

1. The Company's Circumstances and Local Investment

Sunny Window and Door Systems Pty Ltd (the Company) is a newly established Australian business, incorporated in February 2026. We operate as an Australian importer and local supplier of aluminium windows and doors, supported by local customer service, technical assistance, measurement coordination, delivery coordination, installation support, warranty assistance and after-sales service.

During the investigation period, from 1 July 2024 to 30 June 2025, the Company had not yet been established. Our Chinese supplier also did not export the goods under consideration to Australia during that period. There were no relevant import or export transactions between the Company and that supplier.

We respectfully submit that the same treatment may not fully reflect the circumstances of businesses that did not participate in the relevant trade during the investigation period, or before 2026. We therefore respectfully request that the Commission carefully consider, to the extent permitted by law, whether the current exporter classification and applicable rate are appropriate and proportionate in light of those circumstances.

Since establishment, the Company has made substantial upfront investments in its Australian operations, including business premises, customer service, warehousing and distribution, promotion, operating costs, employees and service providers, compliance processes, product testing and certification preparation. As a business with developing order volumes, these costs are real and ongoing. We are working to establish a sustainable, compliant and customer-focused local business over the long term.

A significant additional import cost may have a disproportionate effect on businesses such as ours. Custom-made window and door projects involve costs for design, measurement, manufacturing, shipping, customs clearance and local delivery before the goods reach Australia. Once fixed-price quotations or contracts have been agreed, unexpected cost increases may be difficult to pass on, affecting cash flow and the ability to meet customer commitments.

2. Broader Impact on the Building Industry and Consumers

The supply and installation of windows and doors supports Australian businesses and workers in measurement, transport, warehousing, installation, building works and customer support. Windows and doors are also important components of residential construction and renovation projects. Cost increases or supply disruption may affect builders, installers, subcontractors, construction schedules, homeowners and consumers.

We respectfully request that the Commission consider the practical effect of the measures on recently established Australian businesses, local service providers, the building and construction supply chain and consumers.

3. Cooperation and Request

The Company understands and respects the Commission's responsibility to administer trade remedies investigations in accordance with the law. We are willing to cooperate with any lawful and reasonable request for information, including information concerning import and export activities, business operations and other relevant commercial facts.

We respectfully request that the Commission:

1) Consider that the Company was established after the investigation period and had no relevant import or export transactions during that period.

2) Consider the factual difference between a supplier with no relevant transaction records during the investigation period and an exporter that had relevant transactions but did not cooperate with the investigation.

3) Consider the practical effect of the measures on recently established Australian businesses, consumers, local service providers and the building and construction supply chain.

4) Consider the broader effect of the measures across the window and door industry and its upstream and downstream supply chains, including related building, construction, transport, installation and renovation activities.

Thank you for considering this submission.
Yours faithfully
Junru Shi
Sunny Window and Door Systems Pty Ltd