DEEZON

NON-CONFIDENTIAL VERSION – FOR THE PUBLIC RECORD

Exporter - Foshan Deezon Windows and Doors Co., Ltd

Submission in response to Statement of Essential Facts No. 691

To	The Commissioner, Australian Trade Remedies Commission (formerly the Anti-Dumping Commission) (the **Commissioner** and the **Commission**) Email: Investigations1@atrc.gov.au
Investigation	Investigation No. 691 - Aluminium windows & doors from China (the **Investigation**)
Document responded to	Statement of Essential Facts No. 691 dated 14 October 2026 (the **SEF**)
Submitted by	Foshan Deezon Windows and Doors Co., Ltd (**Deezon**)
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Contact	Provided in the confidential version
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1 Introduction

1.1 Background

On 25 November 2025, the Commissioner initiated the Investigation into aluminium windows and doors (**AWD**) exported to Australia from China. The investigation period is 1 July 2024 to 30 June 2025 (the **Investigation Period**).

The initiation notice, ADN 2025/115, invited Chinese exporters of AWD to complete a preliminary information request (**PIR**) by 8 December 2025, 13 days after initiation. On 14 October 2026, the Commissioner placed the SEF on the public record and made a preliminary affirmative determination. The Commissioner's report to the Minister is due by 16 December 2026.

This submission is lodged by Deezon within 20 days after the SEF was placed on the public record (**Submission**).

1.2 Summary of this Submission

Deezon's submissions are summarised as follows, and the findings sought are listed in Part 8:

(a) Primary submission (Part 3): Deezon is neither an uncooperative exporter nor a non-cooperative entity. It is therefore a residual exporter, subject to IDD of 24.4% and no ICD.

(b) New exporter (Part 4): Deezon is a new exporter, a category the SEF does not consider, and the final report should deal with new exporters expressly.

(c) Alternative submission (Part 5): Any other rate for Deezon should be based on the weighted average export price of the selected exporters, and the dumping margin should not exceed 51.6%.

(d) Goods and exemption (Parts 6 and 7): Some of Deezon's exports are outside the goods description, and specified Deezon products should be exempted.

2 Factual background

2.1 Deezon

Deezon manufactures residential aluminium windows and doors in Foshan, Guangdong. It has historically sold almost entirely in the Chinese market, in the high-end, design-led segment of residential construction. Most of its products are made to order for a particular project. Deezon has no related company in Australia.

Further details of Deezon's product features and Australian customers are provided in the confidential version.

2.2 Deezon's exports to Australia

Deezon made no exports to Australia during the Investigation Period, whether directly, through a trading company or through a related entity.

Deezon's first export shipment to Australia took place after the end of the Investigation Period and shortly before the Investigation was initiated. When PIR responses fell due on 8 December 2025, Deezon's Australian business was at an early stage. The date of the first shipment and the shipping document are provided in confidential Attachment A-1.

2.3 How Deezon learned of the Investigation

Deezon does business in China and in Chinese. It follows market and regulatory news through Chinese-language industry sources and does not monitor the websites of foreign trade remedies authorities. It has never received any communication from the Commission. Before October 2026, it received no notice of the Investigation from China's Ministry of Commerce, the CCCMC, any industry association or any customer. Deezon first heard of the Investigation in mid-October 2026, from news reports in China, after the SEF had been placed on the public record.

3 Deezon is not an uncooperative exporter

The SEF applies the rates for "*uncooperative and all other exporters*" to every Chinese exporter that was neither selected nor listed as a residual exporter. Deezon submits that it is not an "*uncooperative exporter*" as defined in section 269T(1) of the Act, nor a "*non-cooperative entity*" under section 269TAACA(1) of the Act, and is therefore a residual exporter. In summary:

(a) **No relevant information to give:** The PIR and the exporter questionnaire concerned exports during the Investigation Period. Deezon had no such exports, and had no relevant information to give.

(b) **No significant impediment:** Deezon did not significantly impede the Investigation. The absence of a nil response from Deezon had no effect on the Investigation, and there is no evidence of any intention to obstruct or delay it.

(c) **Residual exporter:** Deezon is an exporter of like goods whose exports were not examined and which is not an uncooperative exporter. It therefore meets the definition of residual exporter, and the limits in section 269TACAB(2) of the Act apply.

(d) **Subsidy:** Deezon should be treated in the same way as the residual entities, in relation to which the SEF proposes to terminate the subsidy investigation.

Deezon therefore requests that it be added to the list of residual exporters in the SEF.

4 Deezon is a new exporter

Deezon is a "*new exporter*" as defined in section 269T(1) of the Act, because it did not export the goods or like goods to Australia at any time during the Investigation Period. This can be verified against the import data held by the Australian Border Force.

The SEF makes no finding about new exporters. They are included in the rates for "*uncooperative and all other exporters*" without separate consideration.

Deezon requests that the final report deal with new exporters expressly.

5 The 73.3% rate is unreasonable

If Parts 3 and 4 are not accepted, Deezon submits in the alternative that the method used to set the 73.3% rate is not a reasonable basis for duty on its goods, having regard to sections 269TAB(3) and 269TAC(6) of the Act, because:

(a) it compares an export price at the lowest point of the selected exporters' range with a weighted average normal value;

(b) the resulting dumping margin of 70.4% exceeds every dumping margin calculated on verified data in the Investigation; and

(c) the lowest export price of the selected exporters is not representative of Deezon's goods, which are high-end residential products made to order.

Any other rate for Deezon should therefore be based on the weighted average export price of the selected exporters, and the dumping margin should not exceed 51.6%, being the highest margin found for a selected exporter. Any subsidy margin should likewise be calculated by reference to the weighted average export price rather than the lowest export price.

6 Goods outside the goods description

The goods description covers aluminium windows up to and including 3.0 m high and 4.0 m wide, and aluminium doors up to and including 3.0 m high and 7.0 m wide, whether fully or partially assembled, and excludes curtain wall products (SEF, section 3.3).

Deezon submits that some of its exported goods fall outside the goods description, including oversized units.

The oversized units were fully assembled in Deezon's factory and imported as single complete units, and therefore exceed the dimensional limits as imported. Deezon asks the Commissioner to confirm that these goods are not subject to the Investigation.

The proportion of Deezon's exports that fall outside the goods description, and the product series and dimensions of the units concerned, are set out in confidential Attachment A-3.

Deezon also asks the Commissioner to clarify the status of the following goods:

- electric skylights installed in a roof plane;
- motorised lifting windows wider than 4.0 m; and
- cast-aluminium entrance doors.

7 Application for exemption

Deezon's products are designed and made to order for high-end residential projects. Several have distinctive physical features that standard aluminium windows and doors do not have, and are not readily substitutable for them.

Deezon applies for an exemption under subsections 8(7) and 10(8) of the *Customs Tariff (Anti-Dumping) Act 1975* (Cth) (the **Dumping Duty Act**) for the following goods, each defined by physical features that can be verified at the border:

(a) aluminium windows with an integrated electric motor;

(b) electric skylights; and

(c) French-style aluminium windows and doors.

Product models, technical specifications, drawings and photographs of these goods are provided in confidential Attachments A-2, A-4 and A-5.

8 Findings and recommendations sought

Deezon respectfully asks the Commissioner, in the report to the Minister, to:

(a) find that Deezon is not an uncooperative exporter or a non-cooperative entity, find that it is a residual exporter, and recommend IDD of 24.4% under section 269TACAB(2) of the Act and no ICD (Part 3);

(b) in the alternative, if a class of exporters outside Table 6 of the SEF is retained, treat new exporters as a separate class, with export price and normal value worked out as for residual exporters and no ICD (Part 4);

(c) in the further alternative, base any other rate for Deezon on the weighted average export price of the selected exporters, or at least cap the dumping margin at 51.6%, and calculate any subsidy margin by reference to the weighted average export price rather than the lowest export price (Part 5); and, in any event:

(d) find that Deezon is a new exporter, that it did not refuse to cooperate with the Investigation and that it is not related to any exporter whose exports were examined (Part 4);

(e) confirm that the goods described in Part 6 are not the goods under the Investigation, and clarify the status of the other goods listed in Part 6; and

(f) exempt the goods described in Part 7.

9 Attachments

The following attachments are provided to the Commission in the confidential version only, because they contain commercial shipping records, export data and confidential product designs:

Attachment A-1 – First export shipment

Attachment A-2 – French-style windows and doors

Attachment A-3 – Goods outside the goods description

Attachment A-4 – Goods for which clarification is sought

Attachment A-5 – Products for which exemption is sought