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Submission on the Statement of Essential Facts (SEF) – Investigation 691

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

Submitted by: Anhui Tiandong Doors and Windows Smart Home Co., Ltd.

Date: 3 November 2026

1. Introduction

Anhui Tiandong Doors and Windows Smart Home Co., Ltd. (hereinafter referred to as "Tiandong" or "the Company") respectfully submits this submission in response to the Statement of Essential Facts (SEF) issued by the Australian Trade Remedies Commission (the Commission) on 14 October 2026 in relation to Investigation 691 concerning aluminium windows and doors exported from the People's Republic of China.

Tiandong is a Chinese manufacturer of aluminium windows and doors and is currently seeking to gradually establish and expand its presence in the Australian market through its Australian business partner, TD SKYLINE PTY LTD.

The purpose of this submission is to bring to the Commission's attention the particular circumstances surrounding the proposed Australian business activities, including the establishment date of TD SKYLINE and the significant impact that the provisional combined security rate of 73.3% may have on prospective commercial transactions.

Tiandong respectfully requests that the Commission consider its individual circumstances. In particular, neither Tiandong nor its Australian business partner had any relevant export activities during the investigation period, as Tiandong did not export the goods subject to this investigation to Australia during that period and TD SKYLINE was only established after the investigation period had ended.

Accordingly, Tiandong seeks clarification from the Commission as to whether there is an available procedure through which it may apply for an exporter-specific rate based on its individual circumstances, and what rate would apply to future imports of its products into Australia.

2. Background and Particular Circumstances

The investigation period for Investigation 691 is from 1 July 2024 to 30 June 2025. During this period, Tiandong did not export any goods subject to this investigation to Australia.

TD SKYLINE was established in October 2025, after the conclusion of the investigation period. Accordingly, TD SKYLINE did not exist during the relevant investigation period and had no opportunity to participate in the investigation or provide information relating to its own business activities.

Tiandong wishes to emphasise that the absence of relevant export transactions during the investigation period should not be interpreted as an unwillingness to cooperate with the Commission. Rather, this circumstance arose primarily from the timing of the establishment of the Australian business entity and the subsequent development of the commercial relationship between the two parties.

Tiandong is willing to cooperate fully with the Commission and provide any relevant information and supporting documentation reasonably requested, to assist the Commission in understanding and assessing its particular circumstances.

3. Request for an Exporter-Specific Rate

Tiandong respectfully requests that the Commission separately consider its individual circumstances when determining the appropriate anti-dumping treatment applicable to goods manufactured and exported by the Company.

Tiandong understands that the calculation of an exporter-specific dumping margin may require relevant export transactions and other supporting information from the investigation period. However, where an exporter did not export the relevant goods to Australia during the investigation period, it may not be possible to directly calculate an individual dumping margin within the existing investigation framework due to the absence of relevant export transactions.

In these circumstances, Tiandong respectfully requests that the Commission clarify whether an appropriate statutory procedure is available through which the Company may apply for an exporter-specific rate, including whether such an application may be made through an accelerated review, new exporter review or any other applicable review mechanism.

Tiandong is willing to cooperate with any relevant procedures and provide the necessary information and supporting documentation as required. The Company also seeks clarification as to whether information relating to its future proposed Australian sales and export transactions may be considered in an appropriate subsequent review process.

Tiandong is not seeking preferential treatment or an exemption from the application of anti-dumping measures without a proper legal basis. Rather, the Company seeks a fair opportunity for the Commission to independently assess its circumstances and determine an appropriate rate based on its individual circumstances, rather than automatically applying a rate that may not accurately reflect its particular position.

4. Commercial Impact of the Provisional Security Rate

Tiandong is currently preparing to enter the Australian market through TD SKYLINE. The parties are presently engaged in commercial discussions in relation to several potential orders for the Australian market and are preparing to enter into formal supply contracts.

Furthermore, Tiandong has completed the relevant testing and certification work required for its products to enter the Australian market under AS 2047. This demonstrates that the Company is not merely expressing an intention to enter the Australian market, but has

already made practical preparations and committed considerable time and resources towards establishing its business operations in Australia.

However, the provisional combined security rate of 73.3% has created a significant financial barrier to these prospective commercial transactions. Such a high security requirement would substantially increase the financial burden associated with each import transaction, making it extremely difficult for a newly established Australian business to commence operations in this market.

Tiandong has already made considerable preliminary investments to ensure that its products comply with Australian market requirements and to establish the necessary business arrangements. However, without a clear and practical pathway for obtaining an exporter-specific rate, the current provisional security requirements may prevent the proposed commercial cooperation from proceeding and may ultimately result in otherwise viable business opportunities being abandoned.

Tiandong respectfully requests that the Commission give due consideration to these practical commercial impacts and provide a clear and reasonable pathway for new exporters entering the Australian market to have their individual rates assessed.

5. Specific Requests to the Commission

In light of the circumstances outlined above, Tiandong respectfully requests that the Commission clarify whether an appropriate procedure is available through which the Company may apply for an exporter-specific rate based on its individual circumstances, particularly given that it did not export any goods subject to this investigation to Australia during the investigation period.

Specifically, Tiandong seeks clarification on the following matters:

1. Whether the Company may apply for an exporter-specific rate through an accelerated review, new exporter review or any other applicable statutory review mechanism;
2. What information, supporting documents and evidence would be required to support such an application;
3. Whether an exporter-specific rate may be determined before the Company's future commercial contracts and export transactions are formally finalised; and
4. What security rate would apply to future imports during the interim period before an exporter-specific rate has been determined.

Clarification of these matters is essential for Tiandong and its Australian business partner to assess whether the proposed commercial transactions can proceed and to make informed decisions regarding their future business arrangements.

6. Conclusion

Tiandong respectfully submits that its individual circumstances warrant careful consideration by the Commission, particularly given that the Company did not export any goods subject to this investigation to Australia during the investigation period and that its Australian business partner, TD SKYLINE, was only established after the conclusion of the investigation period.

The Company has already taken practical steps towards entering the Australian market, including completing the relevant AS 2047 testing and certification requirements, and is actively progressing potential commercial orders through TD SKYLINE.

However, the provisional combined security rate of 73.3% has created significant uncertainty and practical commercial difficulties for the proposed business cooperation between the parties.

Tiandong wishes to emphasise that it is not seeking to circumvent the application of Australian anti-dumping laws. Rather, the Company seeks a fair and transparent opportunity for the Commission to assess its individual circumstances and determine an appropriate exporter-specific rate.

The Company remains committed to complying with all applicable Australian trade remedies laws and regulations and is willing to cooperate fully with the Commission throughout any relevant process.

Tiandong respectfully requests that the Commission provide a clear and practical pathway for individual assessment, so that future exports of its products to Australia may be subject to an anti-dumping rate determined through an appropriate assessment of its individual circumstances.

Yours faithfully,

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