AUSTRALIAN TRADE REMEDIES COMMISSION | ANTI-DUMPING INVESTIGATION NO. 691

Formal Submission and Request for Individual Assessment

In relation to Anti-Dumping Investigation No. 691

Submitted by	Jiangsu Jingtai Glass Co., Ltd.
Australian operating entity	JT Glass Enterprise Pty Ltd
To	Australian Trade Remedies Commission
Investigation	Investigation No. 691
Goods under investigation	Aluminium Windows and Doors from the People's Republic of China
Date of submission	28 October 2026

Dear Commissioners,

Jiangsu Jingtai Glass Co., Ltd. (hereinafter referred to as "Jingtai" or the "Company") hereby formally submits these written representations in relation to Australian Anti-Dumping Investigation No. 691 concerning aluminium windows and doors, and the Statement of Essential Facts issued on 14 October 2026 (SEF 691).

Jingtai fully understands and respects Australia's policy objective of maintaining fair trade in accordance with the law and protecting domestic industry against the effects of unfair competition. The Company supports a fair, transparent and evidence-based trade remedies framework. At the same time, it respectfully requests that the Commission, in applying the relevant law, give full consideration to Jingtai's actual export transactions, manufacturing costs, product characteristics, operating model and continuing local operations in Australia.

Jingtai is not an ordinary exporter of windows and doors seeking to enter the Australian market through unfairly low prices. The Company principally uses window and door systems designed and formally licensed in Australia to supply high-performance, custom-made windows and doors for large apartment developments, commercial buildings and public buildings, in accordance with applicable Australian technical standards and project requirements.

The Company is a wholly privately owned and independently operated enterprise, and is neither state-owned nor state-controlled. Its product prices are determined by a combination of actual raw material costs, processing and manufacturing, technology licensing, quality control, technical compliance and a reasonable commercial profit, rather than by the pursuit of the lowest possible selling price alone. Through employees of its Australian operating entity, technical coordination, warehousing, project management, installation management and after-sales services, Jingtai also creates tangible value for employment and commercial service industries in Australia.

I. Jingtai Is a Wholly Private Enterprise and Independently Determines Its Production, Procurement and Export Pricing

Jingtai is privately owned and privately managed. It is not a Chinese state-owned enterprise, nor does the State hold a controlling interest in it. Its day-to-day production arrangements, raw material

procurement, sales negotiations, export quotations and customer selection are determined through its own commercial management processes.

Jingtai acknowledges that private ownership does not, of itself, exempt an enterprise from the application of anti-dumping law, nor does it replace the statutory calculation of normal value and export price. The Company raises this fact to request that the Commission refrain from attributing assumptions of state ownership, state control or non-commercial pricing to Jingtai in the absence of evidence specific to the Company.

II. Use of Formally Licensed Australian Window and Door Systems Reflects a High-Performance Product Positioning and Cooperation with Australian Industry

Jiangsu Jingtai manufactures window and door products using systems formally designed and licensed by [redacted] a well-known Australian supplier of window and door systems. It strictly follows the applicable technical specifications, system design requirements and Australian standards to supply high-performance, custom-made windows and doors for large residential, commercial and public building projects in Australia.

Jingtai's competitive advantage does not arise solely from price; rather, it is founded upon established Australian system designs, specialised manufacturing capabilities, stringent quality control and the capacity to deliver large-scale construction projects on an integrated basis. At the same time, Jingtai's long-term licensing and technical cooperation with [redacted] combines Australian design expertise with specialised manufacturing capabilities and continues to create commercial value for related Australian industries through technical cooperation, product application and market promotion.

Accordingly, Jingtai respectfully requests that, when assessing its product characteristics, business model and market competition, the Commission give full consideration to its use of formally licensed Australian systems, its compliance with high-performance building requirements and its close cooperation with Australian industry, rather than drawing adverse inferences about its ordinary commercial competitive conduct solely from the country of origin of the products or generalised price comparisons.

III. Specialised High-Performance Glass and Customised Architectural Windows and Doors Exhibit Significant Technical Differences and Product Non-Comparability

Certain window and door products manufactured and supplied by Jingtai incorporate innovative, specialised high-performance glazing, including but not limited to Low-E glass with special colours and specialised coatings, high-performance laminated glass incorporating SGP ionoplast interlayers, acoustic laminated glass, composite laminated insulating glass units, and other customised products designed to meet specific building performance requirements.

These products are designed and manufactured to meet the specific requirements of large commercial and high-rise building projects, including requirements relating to glass colour, optical properties, energy efficiency, structural safety, impact resistance, acoustic performance and durability. Certain products incorporate specialised combinations of materials, processing techniques and performance specifications, and differ materially from ordinary standardised residential windows and doors in terms of product characteristics, technical requirements and actual applications.

Jingtai considers that certain specialised high-performance products may have no directly comparable products available in the Australian market on equivalent terms as to technical specifications, performance and commercial supply conditions. Jingtai therefore respectfully requests that the Commission give due consideration to the technical characteristics of the relevant products and their actual substitutability in the market, and undertake an independent assessment of eligible products based on evidence such as specific product specifications, test reports and domestic Australian supply capability.

For specific products for which it can be demonstrated that there are no Australian like goods or directly competitive goods satisfying the relevant statutory criteria, Jingtai intends to lodge a separate Product Exemption Request in accordance with the law, with a view to ensuring that any relevant measures do not unreasonably extend to specialised high-performance architectural window and door products lacking genuine comparability.

IV. Export Price and Normal Value Should Be Fairly Compared on the Basis of Genuine, Verifiable Commercial Transactions and Cost Records

Jingtai operates on a project-specific quotation and manufacturing model. Pricing takes into account actual raw material procurement, production and processing, manufacturing labour, factory overheads, product specifications, order volume, delivery terms and a reasonable profit. Ordinary competitive advantages arising from professional manufacturing efficiency and supply-chain organisation should not be equated with dumping in the absence of a statutory price comparison.

Pursuant to sections 269TAA, 269TAB and 269TAC of the Customs Act 1901, among other applicable provisions, Jingtai requests that, to the extent permitted by the relevant procedures, the Commission examine the Company's export transactions, product models, customer relationships, raw material procurement records, bills of materials (BOM), production cost allocations and financial statements for the investigation period from 1 July 2024 to 30 June 2025, and determine export price and normal value in accordance with the law.

Jingtai requests that the Commission confirm the legal and procedural feasibility of an individual exporter examination at the current stage of the investigation and, where legally permissible, assess the applicable dumping margin on the basis of Jingtai's own verifiable information. The Company acknowledges that this request remains subject to the applicable investigation sampling, procedural and verification requirements and does not mean that an individual rate has automatically been granted.

V. Differences in Procurement Conditions Between Major Building Projects and the Standard Residential Window and Door Market

Jingtai's Australian business is principally directed towards large apartment developments and commercial and public building projects, rather than the retail market for standardised windows and doors for ordinary detached houses. Such projects may involve supply quantities of several thousand square metres, together with continuing engineering and technical coordination, batch manufacturing, staged deliveries and on-site coordination.

When selecting suppliers, customers consider not only price but also performance and test documentation, approved system configurations, manufacturing capacity, construction schedules, technical services and the ability to perform on site. Jingtai considers that these actual procurement

conditions present commercial differences from the standardised residential window and door market that warrant examination.

Jingtai does not assert that all Australian manufacturers are incapable of producing high-performance windows and doors. Rather, it requests that the Commission objectively assess the degree of competition between the relevant products and markets, and the causal relationship with injury to domestic industry, by reference to actual tender records, technical evaluations, the availability of substitutable supply and customer procurement decisions.

VI. Jingtai's Substantive Australian Operations and Contribution to Local Employment

Jingtai's business model is not confined to cross-border sales of imported products; it also involves local Australian technical, service and employment activities. JT Glass Enterprise Pty Ltd maintains showroom and warehousing facilities in Seven Hills, Sydney, and undertakes sales, quotations, technical communications, project management, site coordination, installation management and after-sales services through its local team.

The Company also works with Australian logistics, transport and warehousing providers, installation contractors, engineering and technical consultants, and professional service providers. These activities generate direct employment, wages, commercial procurement and other expenditure on local services. Its licensing and technical cooperation with [redacted] further demonstrates the complementary relationship between Australian design expertise and overseas manufacturing resources.

Jingtai recognises that Australian employment and local operating expenditure do not, in themselves, directly determine the statutory dumping margin. Nevertheless, these matters provide important context for understanding the Company's business model and the potential effects of trade measures on Australia's downstream construction, installation and service industries. Any relevant financial figures and employee data will be supported by actual verifiable records.

VII. Potential Effects on Building Project Costs, Delivery and Related Australian Employment

Major customised architectural window and door projects generally involve lengthy periods for design approval, material procurement, manufacturing, transport and installation coordination. Additional import costs may affect the budgets, procurement arrangements, cash flow and delivery programmes of existing projects, and may also flow through to local transport, warehousing, engineering management and installation services.

Jingtai supports appropriate measures to address injury resulting from unfair trade where established in accordance with the law. At the same time, it respectfully requests that the Commission, within the statutory framework, distinguish on the basis of objective evidence between injury caused by dumped imports and the effects of other market factors, and carefully assess the actual implications for the relevant construction supply chains and local employment.

VIII. Formal Requests

1. **Individual exporter examination.** Confirm the legal and procedural feasibility of conducting an individual exporter assessment of Jingtai at the current stage and, if feasible, determine the relevant dumping margin using Jingtai's own verifiable information.

2. **Injury to domestic industry and causation.** Consider procurement conditions, customer selection criteria and relevant competitive circumstances in major commercial and multi-storey residential projects, and distinguish the effects of other economic factors from those of dumped imports in accordance with the law.

3. **Local economic activity.** Take into account, in the applicable industry and downstream market analyses, the actual economic value generated by Jingtai's Australian employees, warehousing, project management, installation, after-sales services and technical cooperation.

4. **Fair treatment under the law.** Where verified evidence and the applicable procedures establish that Jingtai has not engaged in dumping, or that the statutory conditions for termination of the relevant investigation have been satisfied, make the appropriate determination in accordance with the law. If an individual examination cannot be undertaken at this stage, please identify the relevant procedural basis and any available subsequent avenues.

IX. Conclusion

Jiangsu Jingtai Glass Co., Ltd. has consistently respected Australian laws and regulations, technical standards and the principles of fair competition, and remains committed to establishing long-term, stable and mutually beneficial relationships with Australian businesses.

Jingtai's competitive strengths derive from the combination of Australian-designed systems, high-performance products, specialised manufacturing, project delivery capabilities and local Australian services, rather than from unfairly low prices that harm Australian manufacturers. Jingtai respectfully requests that the Commission undertake an independent, objective and impartial assessment of the Company's export activities based on genuine, complete and verifiable facts and evidence.

Thank you for considering this submission. Jingtai is willing to provide further clarification and cooperate with appropriate verification procedures in accordance with applicable procedural requirements.

Yours faithfully,

Jiangsu Jingtai Glass Co., Ltd.

Authorised representative: 李景 Li Jing

Position: Director

Date: 28 October 2026