PUBLIC RECORD - NON-CONFIDENTIAL SUBMISSION

Response to Statement of Essential Facts No. 691

Investigation No. 691 - Aluminium Windows and Doors from China

Submitted to	Australian Trade Remedies Commission (ATRC)
Submitted by	Guangdong Dejiyoupin Doors and Windows Co., Ltd.
Capacity	Manufacturer and exporter, People's Republic of China
Date	30 October 2026
Authorised representative	SU JIN YUAN, General Manager
Contact email	doorsandwindows@dejiyp.com

1. Purpose and Participation

This submission is filed by Guangdong Dejiyoupin Doors and Windows Co., Ltd. ("the Submitter") in response to Statement of Essential Facts (SEF) No. 691, published by the Australian Trade Remedies Commission (ATRC) on 14 October 2026 pursuant to the *Customs Act 1901*.

Guangdong Dejiyoupin Doors and Windows Co., Ltd. is a manufacturer of thermal-break aluminium windows and doors based in the People's Republic of China. The Company commenced tapping into the Australian market in 2021.

Guangdong Dejiyoupin Doors and Windows Co., Ltd. ("Dejiyoupin") respectfully submits the following comments on Statement of Essential Facts No. 691 (SEF 691). This submission is made solely on behalf of Dejiyoupin. It addresses the Company's production characteristics, its limited historical residential sales into Australia, and the representativeness of the dumping methodology adopted for non-cooperative exporters.

Dejiyoupin received correspondence in relation to Investigation 691 but failed to submit a response to the Preliminary Information Request and the Exporter Questionnaire within the prescribed time limits. At that time, the Company had limited awareness of Australia's trade remedy investigation rules and procedures, and therefore did not fully recognise the significance of these initial requests, nor the implications of non-participation. It acknowledges the missed deadlines and now seeks to cooperate constructively. The Company does not submit that this explanation automatically entitles it to cooperative treatment or a company-specific rate.

2. Australian-market entry and limited residential sales

According to the Company's available records, certain of its products obtained AS 2047 certification for Australian windows and doors from 2021, and the Company commenced developing the Australian residential market in the second half of 2021.

The Company's sales to Australia are limited in volume, consisting mainly of customised products for medium- to- high- end residential projects. Based on export project records available to date, the Company has not supplied any commercial building projects in Australia. The Company is able to compile relevant export documentation including orders, invoices and export declarations should project details be required. Financial records show that between July 2024 and June 2025, the Company's total export value to Australia was approximately RMB 1500,000. These exports were all destined for private residential projects in Australia. Compared with the aggregate export volume of such goods from China to Australia, the Company's export share is negligible.

While SEF 691 includes estimates of the total Australian market for the subject goods, a credible company-specific market share can only be calculated using verified sales data under a consistent valuation basis for the same period. The Company has instructed its finance team to compile the relevant statistics and prepare its complete set of supporting records. It stands ready to cooperate fully with the Commission's verification processes, subject to reasonable notice and formal procedural arrangements. All information supplied will be supported by primary business records.

3. Specialised products and price comparability

Dejiyoupin develops and manufactures both thermally broken and non-thermally broken aluminium window and door systems. Thermally broken systems constitute a substantial portion of its product range. For export orders destined for Australian residential projects, the Company's products typically feature thermally broken frames, insulated glazing, specified operation and security hardware, high-performance sealing systems and custom dimensions. Thermal barrier components, profile design, glazing configuration, hardware specifications and manufacturing processes can materially affect the cost and selling price of window and door units.

All of the Company's products supplied to Australia adopt multi-chamber profiles with a thickness of 1.8 mm or above. Hardware is sourced from reputable brands including Wehag, Doric and HOPPE. Having regard to the target customer segment

and the required product construction and performance standards, the prices of Dejiyoupin’s goods exported to Australia are not set at low levels to disrupt the market. The Company respectfully requests product-to-product comparability when its goods are assessed. It does not contend that thermally broken products fall outside the scope of the subject goods solely by virtue of their construction. Rather, it requests that any comparison between export prices and normal values take account, to the extent permitted under the applicable methodology, of material differences in frame type, glazing configuration, dimensions, hardware and other relevant product characteristics.

4. Clarify for manufacturing and raw- material procurement-Selling price

Dejiyoupin independently carries out product development, manufacturing and quality testing for aluminium windows and doors. All aluminium profiles and glass are purchased at prevailing market rates.

The preliminary finding in SEF 691 is that dumped and subsidized imports from China have caused material injury to the Australian domestic aluminium window and door (AWD) industry producing like goods.

The Company submits that the market purchase prices of all its raw materials are open and transparent. It has not received any government subsidies, including preferential subsidies for raw materials granted under any government policies. During the investigation period, the Company’s export share to Australia is negligible, and its exports could not have contributed to the alleged material injury sustained by the Australian domestic industry.

Attached herewith are the Company’s annual procurement contracts for aluminium profiles, glass and thermal break strips, together with selected export sales contracts. These documents are provided to demonstrate that the Company purchases aluminium profiles and glass at no less than prevailing market prices, and that its sales to Australia are not made at artificially low prices for the purpose of disrupting the Australian domestic market.

5. Comments on section 6.12 of SEF 691

SEF 691 preliminarily assigns a dumping margin of 70.4% to non-cooperative and all other exporters. Section 6.12 explains that the Commission relied on the lowest verified FOB export price among selected exporters, drew on information from Preliminary Information Request (PIR) responses and the Australian Border Force,

and applied a weighted-average normal value for the relevant selected exporters.
Dejiyoupin acknowledges that the Commission may rely on information available on the record because the Company failed to submit its questionnaire responses. Nevertheless, the Company respectfully seeks clarification on whether, and how, the selected export-price proxy and weighted-average normal value account for differences in product mix. In particular, the model-control-code framework outlined in section 3.5 of SEF 691 distinguishes relevant product characteristics. Dejiyoupin enquires whether and how those characteristics were taken into account when calculating the dumping margin for an exporter without company-specific records. The Company notes the Commission's own recognition that window and door prices vary materially according to project specifications. Costs calculated solely by reference to external benchmarks may deviate from actual production costs, which could artificially inflate the dumping margin. The Company therefore respectfully requests the Commissioner, when making the final assessment, to give due consideration to the actual transaction costs of each market-oriented producer.
The Company does not assert, in the absence of verified records, that its dumping margin is zero or that the preliminary 70.4% figure is necessarily unlawful. It respectfully requests clarification whether the Commission may lawfully accept, at this stage, transaction-level invoices, model specifications, quotations, export declarations, procurement records and relevant production-cost information, and readmit the Company's submission for participation in the investigation.

6. Specific Requests

The Company respectfully requests the Commission to:

- Confirm how Dejiyoupin is classified within this investigation, and identify any available procedural pathway for the submission of late, company-specific evidence and procedural clarifications;
- Explain how the lowest-verified-FOB-price methodology in section 6.12 accounts for variations among customized, thermally broken and non-thermally broken model configurations;
- Clarify whether product-level documentation and verified sales and cost records may be considered at this stage, and specify the applicable deadlines and confidential filing procedures;
- Take into account the product characteristics and any admissible, verifiable company-specific evidence when assessing the representativeness of price comparisons for the final report. The Company does not seek exemption from the investigation, and seeks a determination on whether it may be relieved from any final anti-dumping or countervailing duty.

7. Application for product- exemption

Consideration:

Dejiyoupin acknowledges that it failed to submit its questionnaire responses by the required deadlines. It lodges these comments together with supporting procurement and export data, and respectfully requests the Commission to undertake a careful assessment of the Company's circumstances. The Company respectfully asks that these submissions be considered when the Commission formulates its final recommendations. Dejiyoupin will provide accurate and comprehensive responses to any lawful information requests issued by the Commission.

Yours faithfully,

SU JIN YUAN

General Manager For and on behalf of Guangdong Dejiyoupin Doors and Windows Co., Ltd.

Public references consulted Australian Trade Remedies Commission, Statement of Essential Facts No. 691 (14 October 2026), sections 3.3-3.5 and 6.12; see also chapters 11-12 concerning recommended measures. Australian Trade Remedies Commission, TRN 2026/147 (14 October 2026), preliminary afffrmative determination. Dejiyoupin company website, 10 October 2020, public AS 2047 test/qualiffcation announcement: https://www.dejiyp.com/news/ppdt/1471.html Dejiyoupin company materials (background only; supporting company records may be supplied subject to the Commission's procedures).