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NON-CONFIDENTIAL VERSION

Submission in Response to the Statement of Essential Facts Investigation 691

Request for Individual Exporter Treatment and Recognition of the Unintended Harm to Responsible Australian Importer-Manufacturer Businesses

Submitted by: Xing Fa Aluminium Australia Pty Ltd
trading as Hi Style Windows & Doors

Subject goods: Aluminium windows and doors exported from China
Date: 3 November 2026

PUBLIC VERSION – COMMERCIALLY SENSITIVE DETAILS AND SUPPORTING APPENDICES OMITTED

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1. Executive Summary

The Unintended Harm to Legitimate Australian Businesses Operating Through Integrated International Manufacturing Arrangements.

Xing Fa Aluminium Australia Pty Ltd trading as Hi Style Windows & Doors (Hi Style) respectfully submits this response to the Statement of Essential Facts (SEF) published in Investigation 691.

Hi Style supports fair competition and recognises that genuine dumping and unfair trade practices can cause material injury to Australian manufacturers. Hi Style is not asking the Commission to abandon legitimate anti-dumping measures or to grant an exemption merely because it operates through an international manufacturing arrangement. It asks the Commission to assess the relevant Chinese exporting entity individually, on the basis of verified costs, prices, sales and transaction records, rather than assuming that a residual rate necessarily reflects its actual circumstances.

Hi Style is an Australian-operated business with substantial local commercial functions. It developed a dedicated manufacturing relationship in China to support its Australian operations. The Australian business remains responsible for customer relationships, project management, product specifications, technical coordination, warehousing, logistics, installation coordination, warranty and after-sales service.

The relationship is a documented, dedicated and related-party manufacturing arrangement. The Australian company and its Chinese manufacturing entity maintain interconnected commercial obligations, including extended trade credit and outstanding intercompany balances. The detailed balances, payment history and supporting records are provided, where appropriate, in the confidential submission and are not reproduced in this public version.

Hi Style is already exposed to intense price competition. It may either reduce prices and compress the resources available to support its Australian operations, or refuse to match lower quotations and lose projects, customers and market share. The Commission should ensure that measures address established dumping without unintentionally harming responsible Australian businesses or attributing all market price pressure to dumping.

Hi Style respectfully asks the Commission to:

- assess the related Chinese exporting entity on an individual, evidence-based basis and not automatically apply a residual exporter rate where an individual assessment is available under the applicable rules;
- examine the actual related-party manufacturing, export, payment and accounting records, including the commercial terms and treatment of extended trade credit;
- recognise the Australian functions, obligations and risks undertaken by Hi Style when considering the wider effects of the investigation;
- distinguish injury caused by dumped imports from injury caused by other market factors, as required by the Customs Act 1901; and
- clarify whether the described aluminium wall system falls within the goods under consideration or an applicable exclusion.

2. Hi Style's Australian Business and Integrated Manufacturing Arrangement

Hi Style is an Australian-operated aluminium windows and doors business with more than ten years of involvement in the Australian market. Its activities extend beyond importing finished products and include:

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- sales, customer relationships and project development;
- project-specific estimating and quotation;
- product design coordination and technical specifications;
- Australian building compliance and engineering coordination;
- warehousing, inventory management, freight and delivery coordination;
- installation coordination and subcontractor management; and
- warranty, defect rectification, customer complaints and after-sales service.

Hi Style's Australian business bears commercial risks associated with customer payment delays, project changes, installation issues, warranty claims, exchange-rate movements and changing market conditions. It also purchases local services and maintains Australian employees and facilities. Specific financial amounts and supporting accounting records have been omitted from this public version because they are addressed in the confidential material.

Hi Style's Chinese manufacturing relationship is dedicated substantially to supporting the Australian business and is related-party in nature. Hi Style acknowledges that the relationship is not an arm's-length relationship between unrelated entities. It invites the Commission to examine the underlying records, including intercompany invoices, ledgers, payment records, production information and relevant bank transactions.

The arrangement does not operate simply as an immediate cash-payment transaction after each shipment. The parties have maintained extended trade credit and substantial interconnected commercial obligations. The detailed payment periods and balances are withheld from this public version. Hi Style does not suggest that extended credit, by itself, establishes that export prices are fair or that dumping has not occurred. It is a relevant commercial fact that should be examined when assessing the related-party transactions and the appropriate treatment of the exporter.

3. Request for Individual Exporter-Specific Assessment

Hi Style requests that the Commission assess its related Chinese manufacturing and exporting entity individually, by reference to the entity's actual export sales, normal value information, costs, adjustments and supporting records, in accordance with the applicable statutory methodology.

The Australian importer and the Chinese exporting/manufacturing entity are separate legal entities. The Australian company's local activities and commercial contribution do not, by themselves, determine the dumping margin of the Chinese exporter. Equally, the existence of a related-party relationship should not replace examination of the actual transaction evidence.

Hi Style has made a company-specific treatment request and seeks consideration of the relevant Chinese entity on its own verified information. The confidential submission contains the entity-specific details and supporting commercial records. Hi Style respectfully asks the Commission to identify and assess the correct exporting entity and to explain the basis for any decision to apply an individual rate or a residual rate.

Hi Style is willing to cooperate with verification and to provide further information reasonably required by the Commission. Its request is for an accurate assessment based on evidence, not preferential treatment without substantiation.

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4. AGWA's Recognition That Overseas Manufacturing Can Be Necessary

Hi Style draws attention to the Australian Glass and Window Association's (AGWA) article published on 29 November 2023, "Using Foreign Manufacturers? Here's How To Reduce Your Risks". The article stated that Australia's skills shortage and high manufacturing costs mean importing products and parts from overseas can make good business sense.

The article also discussed responsibilities and risks associated with overseas manufacturing, including product safety and quality, supplier verification, intellectual property, currency movements, geopolitical and supply-chain risks, product liability, customer complaints and recalls.

Hi Style does not suggest that all imports are responsible or that importing businesses should receive favourable treatment automatically. Its submission is that responsible imports and unfair trading practices are not the same thing, and that different exporters and business arrangements should be assessed on their actual evidence.

AGWA has also publicly acknowledged that not all imports are problematic and that many importing companies try to operate responsibly. Hi Style respectfully submits that this distinction is relevant to an evidence-based assessment in Investigation 691.

5. International Manufacturing and Australian Industry Development

Hi Style's business model reflects an international manufacturing arrangement developed to serve Australian customers. The use of overseas manufacturing does not mean that all commercial activity or responsibility has moved offshore. Hi Style continues to undertake Australian sales, project coordination, technical work, warehousing, installation coordination, compliance-related activities and after-sales support.

Supporting Australian industry and participating in global manufacturing are not necessarily mutually exclusive. Australian industry development also requires skilled workers and technical capability in areas such as façade engineering, window and door system design, building-envelope performance, structural and wind-load assessment, glazing, installation technology and product compliance.

Increasing the cost of imported products does not, by itself, create the technical workforce or compliance capability required for more complex domestic manufacturing. Hi Style submits that fair competition, local skills development and responsible international supply chains should be considered together.

6. Distinguishing Different Importer Business Models

There are different business models in the Australian aluminium window and door market. Some businesses purchase finished goods from unrelated overseas suppliers for local resale. Other Australian businesses develop and manage dedicated overseas manufacturing arrangements while retaining substantial Australian commercial functions and responsibilities.

Hi Style's distinguishing feature is not simply that it imports from China. It is the documented, dedicated and related-party manufacturing arrangement, under which the Australian company and Chinese factory maintain substantial interconnected commercial obligations, including extended trade credit and outstanding receivables.

Hi Style recognises that the Commission's statutory dumping assessment must be based on the applicable legal requirements and evidence, rather than a general policy preference. Nevertheless, the

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commercial structure is relevant when assessing the reliability of transaction records, related-party pricing, allocation of costs and the actual export price. The Commission should not assume that a residual rate necessarily reflects the actual circumstances of every exporter included in that category.

7. Request for Clarification – Aluminium Window Wall Systems Functioning Primarily as Wall Elements

Hi Style seeks clarification regarding the treatment under Investigation 691 of a type of aluminium window wall system that functions primarily as part of an external building wall rather than as a conventional window or door.

The product construction, as presently described, is:

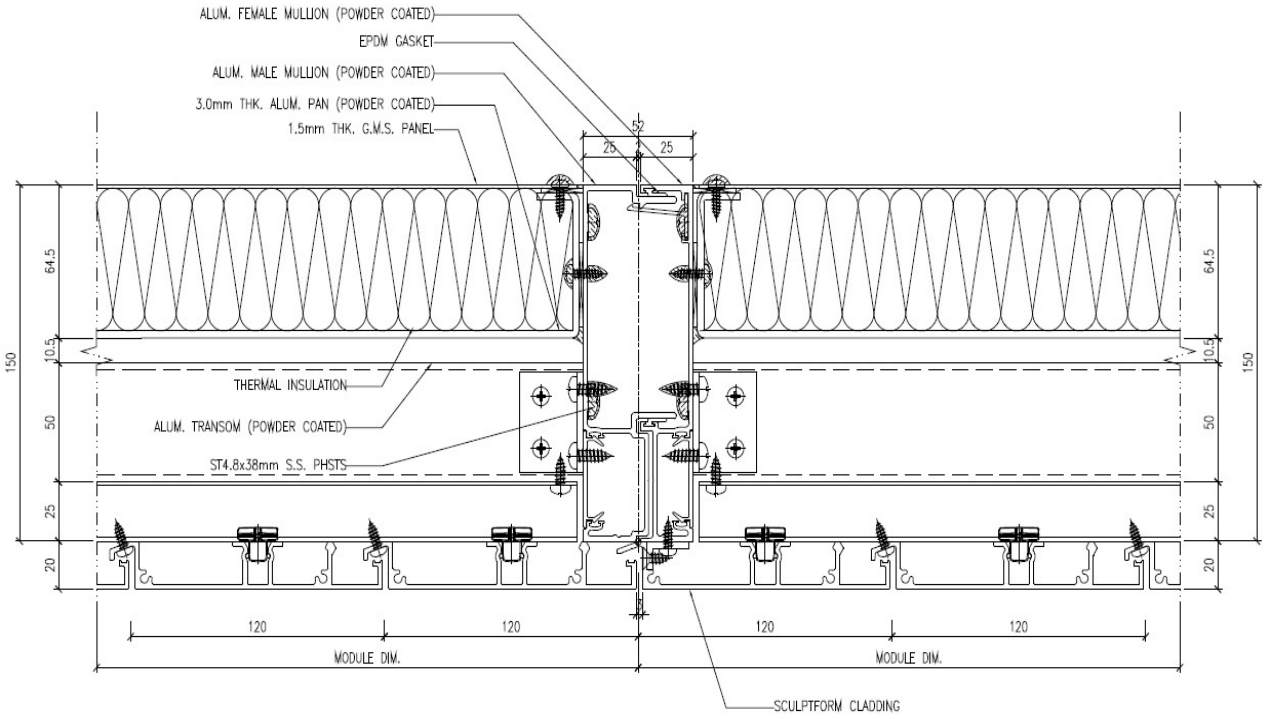
- an aluminium frame;
- an aluminium flat bar;
- an insulation layer;
- a further aluminium flat bar; and
- external aluminium cladding.

The product is intended to function primarily as an insulated wall element. It is not described as a conventional window or door assembly providing an opening for light, ventilation or access. Hi Style understands that the scope of the investigation distinguishes the goods under consideration from certain excluded products, including curtain wall products. However, Hi Style does not assume that the product described above necessarily falls within an exclusion.

Hi Style respectfully requests that the Commission clarify whether this type of aluminium wall system falls within the goods under consideration in Investigation 691 or is excluded. In particular, the Commission is requested to explain how it distinguishes between aluminium window and door assemblies, curtain wall products and aluminium wall systems that primarily function as insulated external wall elements.

This clarification is important to ensure that products are correctly classified and that anti-dumping measures are not applied to goods outside the defined scope of the investigation. Hi Style can provide further technical drawings, cross-sections, installation details and product information if required.

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8. Product Specification, Compliance Verification and Fair Competition

Hi Style was approached to provide a quotation for a project where the project's energy report expressly required a thermally broken aluminium window and door system. Hi Style became aware of a competing quotation from a Chinese window and door company offering a non-thermally broken system for the same project.

A non-thermally broken system may have a lower quoted price, but it does not provide the same product specification as the system identified in the project's energy report. Hi Style was therefore placed in a difficult commercial position: pricing a system that met the stated requirement could make its quotation less competitive, while Hi Style was not prepared to compromise the specified system requirement.

This raises broader concerns about industry oversight, verification and the practical allocation of responsibility between suppliers, builders and other parties involved in construction projects. Where a builder relies solely on a declaration or compliance statement provided by a window and door supplier, without adequately verifying whether the actual products supplied and installed meet the project-specific requirements, there is a risk that products that do not meet those requirements may nevertheless be accepted in practice. The legal responsibilities of each party must, of course, be assessed under the applicable requirements.

The commercial consequence is that businesses which invest in technical expertise, understand project-specific requirements and price for products that meet those requirements may lose projects to lower-priced alternatives that do not appear to meet the same specifications. This can place responsible businesses at a commercial disadvantage.

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Hi Style submits that effective industry oversight should address not only the products being imported, but also the verification of product specifications, the reliability of compliance documentation and the responsibilities of relevant parties throughout the supply chain and construction process. Greater technical knowledge and training are important for builders, installers, designers and certifiers, particularly in relation to thermally broken systems, façade performance, energy efficiency and window and door compliance.

This example is provided as an industry and market-compliance concern. Hi Style does not ask the Commission to determine the compliance of a particular third-party product on the basis of a quotation alone.

9. Injury Assessment, Causation and Wider Australian Economic Impact

The purpose of anti-dumping measures is to address unfair trade and material injury. The Commission should carefully distinguish injury allegedly caused by dumped imports from injury arising from other market factors.

Section 269TAE(2A) of the Customs Act 1901 requires consideration of whether injury to an Australian industry is being caused or threatened by factors other than the exportation of the goods under investigation. The factors identified in the provision include the volume and prices of non-dumped imports, changes in demand or consumption patterns, competition between foreign and Australian producers, technological developments, and the export performance and productivity of the Australian industry. Injury caused by other factors must not be attributed to the investigated imports.

Hi Style respectfully submits that aggressive market competition, differences in product specifications, market segmentation and broader construction market conditions should be properly examined rather than automatically attributing all market price pressure to dumping. The Commission should distinguish injury caused by dumped imports from injury arising from these other factors when assessing causation and the appropriate extent of any measures.

The Australian market includes manufacturers, importers, installers, builders, developers, subcontractors and consumers. Measures that materially increase costs for responsible Australian businesses may also affect construction costs, consumer choice, local installation and service work, and demand for locally purchased glass, hardware and other services. These wider effects should be considered without detracting from the Commission’s statutory task of determining whether dumping and material injury have been established.

10. Conclusion

Hi Style supports fair trade, a viable Australian manufacturing industry and measures to address genuine dumping. It does not seek special treatment without evidence. It asks for an individual, accurate and evidence-based assessment of the relevant Chinese exporting entity, taking account of the actual transaction records and the related-party manufacturing arrangement.

Hi Style has retained substantial Australian operations and continues to accept responsibility for local customers, projects, technical coordination, warehousing, installation coordination, warranty and after-sales service. Responsible Australian businesses operating through international manufacturing arrangements are part of the Australian economy.

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The Australian Government should not have to choose between supporting local manufacturing and allowing responsible Australian businesses to participate in global manufacturing. These objectives can and should coexist.

Hi Style respectfully asks the Commission to assess the relevant exporter on its verified individual circumstances, distinguish dumping-related injury from injury caused by other factors, and clarify the scope treatment of the aluminium wall system described in this submission.

Hi Style remains willing to cooperate fully with the Commission and provide further information reasonably required.

Yours faithfully,

Jay Yu

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