SUBMISSION IN RESPONSE TO THE STATEMENT OF ESSENTIAL FACTS

Investigation No. 691 | Aluminium Windows and Doors from China

PUBLIC RECORD | 31 October 2026

Submitting party	STILLVIEW WINDOWS AND DOORS PTY LTD
ABN / ACN	ABN 30 693 936 739	ACN 693 936 739
Established	23 December 2025
Australian correspondence address	33 Heidelberg Street, East Brisbane QLD 4169, Australia
Contact	Chao Zhang, Director	mark.zhang@stillviewwindows.com.au
Other director	Yang Zhao, Director

1. Purpose and standing

STILLVIEW WINDOWS AND DOORS PTY LTD (StillView) submits these comments as a prospective Australian importer and interested party. StillView proposes to supply architectural aluminium windows and doors manufactured in China. This submission concerns the treatment of prospective new exporters that did not export the subject goods to Australia during the investigation period (1 July 2024 to 30 June 2025).

2. Identification of the proposed Chinese supply chain

The contemplated supply arrangement is manufacturer → related Chinese trading company → StillView Australia. The trading company would contract with and invoice StillView for the export sale; the manufacturer would produce the goods. The appropriate exporter designation under Australia's trade-remedy law should be determined by the Commission from the actual commercial arrangements and supporting documents.

Manufacturer	Tianjin Siruige Doors and Windows Co., Ltd. (天津市斯瑞阁门窗有限公司)
Manufacturer USCC	91120112690692461E
Manufacturer established	5 August 2009
Manufacturer address	No. 11, Jianshe Second Road, Balitai Town, Jinnan District, Tianjin, China
Related trading company	Tianjin Jingguan International Trade Co., Ltd. (天津市境观国际贸易有限公司)
Trader USCC	91120112MA82RRMB43
Trader established	27 August 2026
Trader registered address	Unit 1-1-103, No. 11, Jianshe Second Branch Road, Balitai Town, Jinnan District, Tianjin, China

3. No investigation-period exports and non-participation

The Chinese trading company was incorporated after the investigation period. The manufacturer was established earlier. Based on information made available to StillView, neither Chinese entity exported the subject goods to Australia during the investigation period or had commenced commercial exports of those goods to Australia as at the date of this submission. StillView understands that the entities did not participate in the original investigation because they had no relevant Australian export transactions to report, rather than because they declined to cooperate. The manufacturer is able to provide a signed statement and supporting business records for verification if requested.

3A. Product development, independent testing and energy-efficiency context

Between December 2025 and February 2026, StillView and Tianjin Siruige Doors and Windows Co., Ltd. worked together to develop and prepare the StillView Thermal 100 thermally broken aluminium window and door system for the Australian market. The proposed offering is positioned around thermal performance, double glazing and

architectural applications, rather than a strategy of competing primarily on the lowest price. This describes StillView's intended commercial positioning and is not presented as a finding about dumping margins or the pricing of particular exports.

The commercial rationale includes the evolving demand for energy-efficient building components following the introduction of the NCC 2022 residential energy-efficiency provisions. In Queensland, the updated requirements commenced on 1 May 2024 and introduced a seven-star thermal-performance benchmark for most new houses and townhouses, subject to applicable pathways and exceptions. Windows and glazing form part of the building envelope assessed in achieving whole-dwelling energy performance. StillView seeks to offer builders and designers additional options for meeting project-specific thermal and architectural requirements. A seven-star rating applies to the dwelling as a whole, not as a standalone certification of a window product.

Following this development work, Intertek performance test reports for StillView Thermal 100 products were originally issued on 10 February 2026 under AS 2047:2014 (Amdt 2:2017). The reports identify StillView Windows & Doors as the applicant and Tianjin Siruige Doors and Windows Co., Ltd. as the manufacturer (including report references 260122002SHF-001 and 260122002SHF-004). These reports substantiate the parties' testing arrangements and the February 2026 issue date; they do not, by themselves, independently verify the development start date, establish the absence of prior exports or certify whole-dwelling seven-star compliance. Supporting report extracts can be provided to the Commission on request.

Reference: Queensland Building and Construction Commission, "NCC 2022 – Energy Efficiency" (effective 1 May 2024); Intertek AS 2047 reports dated 10 February 2026.

4. Treatment of prospective new exporters

StillView understands that the current provisional All Other Exporters rate is 73.3%, comprising 70.4% dumping security and 2.9% countervailing security, and acknowledges the Commission's earlier advice that the proposed exporter currently falls in that category. StillView does not assert an automatic entitlement to the 24.4% residual-exporter rate.

StillView respectfully asks the Commission to consider, to the extent permitted under the Customs Act 1901 and the scope of this investigation, the factual distinction between a prospective exporter with no Australian exports during the investigation period and an exporter with relevant exports that did not cooperate. Where current law requires the same classification, StillView requests that the final report explain the appropriate procedural pathway for prospective new exporters.

5. Accelerated review and related-company arrangements

StillView appreciates the Commission's advice that an accelerated review is not available while Investigation 691 remains under way and may be available following the imposition of definitive measures. We request guidance, where practicable, on the evidentiary requirements for a new exporter with no Australian export sales, the identification of the exporter where a manufacturer supplies through a related trading company, and any subsequent supplier-linking process. StillView acknowledges that any independent measure or linking decision must be based on verified facts and the applicable legal requirements.

6. Requests to the Commission

1. Consider the circumstances of prospective new exporters with no Australian export transactions during the investigation period when preparing the final report.
2. Clarify whether the current investigation permits any differentiation in exporter categorisation, or whether individual treatment must instead be sought through an accelerated review after definitive measures are imposed.
3. Provide procedural guidance concerning exporter identity, the use of verifiable manufacturing and accounting evidence in the absence of Australian export sales, and supplier linking where relevant.

7. Status of information

This submission is made for the public record. Business registration and trade documents can be made available to the Commission upon request. Any commercially sensitive material would be submitted in accordance with the Commission's confidentiality requirements. The absence of exports by the manufacturer remains subject to confirmation by its authorised officer and available source records.

Submitted for and on behalf of STILLVIEW WINDOWS AND DOORS PTY LTD

Chao Zhang | Director

Yang Zhao | Director

31 October 2026