# Shandong Huada Window Door and Curtain Wall Co., Ltd.

**NON-CONFIDENTIAL - PUBLIC VERSION**

This non-confidential version is suitable for publication on the Investigation 691 Electronic Public Record. Confidential commercial information has been redacted and identified in general terms.

11 November 2026

**The Commissioner**
**Anti-Dumping Commission**
**Australia**

**Re: Investigation No. 691 - Aluminium windows and doors from the People's Republic of China**
**Request for reconsideration of the residual exporter anti-dumping rate**

Dear Commissioner,

On behalf of Shandong Huada Window Door and Curtain Wall Co., Ltd. (**Huada** or the **Company**), we respectfully submit this appeal in response to the Statement of Essential Facts (**SEF**) issued in Investigation No. 691 concerning aluminium windows and doors from the People's Republic of China.

Huada requests that the Commission reconsider the residual exporter anti-dumping rate currently applicable to the Company and, where permitted under the applicable legislation and procedures, consider granting Huada a lower company-specific rate. Huada submits that its participation in the investigation, the information provided in its Preliminary Information Request (**PIR**) response, and its actual exports to Australia after the investigation period warrant further consideration of its treatment and the rate applicable to its future exports.

## 1. Huada's participation and cooperation

Huada submitted its PIR response on 8 December 2025. In that response, the Company identified itself as a manufacturer of aluminium windows and doors and provided information regarding its business operations, company structure, domestic sales and export arrangements. Huada also expressly declared its willingness to cooperate with further examination, including completing an Exporter Questionnaire and permitting an on-the-spot verification visit if selected by the Commission.

Huada respectfully requests confirmation that its PIR response and associated information have been received and considered in the investigation and in determining the rate applicable to the Company.

## 2. Post-investigation-period exports to Australia

In its PIR response, Huada reported that it did not supply aluminium windows and doors to Australia during the investigation period of 1 July 2024 to 30 June 2025. However, Huada has made actual exports of aluminium windows and doors to Australia after that period.

As supporting evidence, Huada submits an export customs declaration concerning a post-investigation-period export to Australia. **[Confidential commercial information relating to the overseas consignee, customs declaration date, tariff classification, quantity and transaction value has been omitted.]**

This transaction confirms that Huada is an actual manufacturer engaged in commercial exports of aluminium windows and doors to the Australian market. Huada acknowledges that the transaction does not constitute an export sale during the investigation period and should not be substituted for investigation-period data in calculating the dumping margin. Nevertheless, it is relevant supporting information concerning Huada's export activities and ongoing participation in the Australian market.

## 3. Request for a company-specific assessment

The SEF identifies Huada as a residual exporter and indicates a residual exporter dumping margin of 24.4%. Huada respectfully requests that the Commission reconsider application of that rate to the Company and assess whether a lower rate may be determined based on Huada's circumstances and the information available.

In particular, Huada requests that the Commission:

- reconsider the 24.4% residual exporter anti-dumping rate currently applicable to Huada;
- consider granting Huada a lower rate where legally and procedurally available;
- assess whether Huada may be examined individually, or whether another appropriate procedure is available to determine a company-specific rate;
- consider Huada's submitted information and willingness to cooperate in any further assessment; and
- if an individual rate cannot be determined in the current investigation, clarify the procedure and timing for Huada to apply for an individual assessment, review or reassessment based on its actual export transactions.

Huada makes this request so that the rate applicable to the Company reasonably reflects its circumstances and is not applied without consideration of its participation and available information.

## 4. Review of the residual exporter rate

Huada also respectfully requests that the Commission review the methodology and data underlying the 24.4% residual exporter rate before issuing the final report. In particular, Huada requests consideration of the following matters:

**Product comparability and matching.** Aluminium windows and doors may differ significantly in dimensions, opening styles, aluminium profile systems, glazing specifications, hardware, performance requirements and degree of fabrication. Huada requests confirmation that products used in the residual rate calculation are sufficiently comparable and that relevant product differences have been appropriately considered.

**Export price and normal value methodology.** Huada requests confirmation that the export price and normal value used to establish the residual rate were determined consistently with the applicable legislation and the methodology described in the SEF.

**Adjustments and calculation consistency.** Huada requests a review of relevant adjustments, where applicable, including freight, insurance, packaging, selling expenses, trade level and other price-related adjustments, to ensure that the calculation is consistent and that no cost or price component has been omitted, duplicated or treated inconsistently.

**Representativeness of selected exporters' data.** Huada requests that the Commission consider whether the data used to establish the residual rate reasonably represent the circumstances of residual exporters and the range of products covered by the investigation.

Subject to confidentiality requirements, Huada also requests sufficient non-confidential information regarding the calculation methodology to understand and meaningfully comment on the basis of the proposed rate. If the Commission's review identifies any issue with the methodology, data selection, product comparison or adjustments, Huada respectfully requests that the rate be recalculated and reduced accordingly.

## 5. Requested outcomes

Huada respectfully requests that the Commission consider the following circumstances together: Huada's PIR response dated 8 December 2025; its identification as a manufacturer of aluminium windows and doors; its reported absence of Australian exports during the investigation period; its actual post-investigation-period

exports to Australia; the information provided on its business operations, domestic sales and export arrangements; and its express willingness to cooperate with further examination and verification if selected.

For the reasons set out above, Huada respectfully requests that the Commission:

1 confirm receipt and consideration of Huada's PIR response;

2 confirm that Huada's reported absence of exports during the investigation period has been accurately recorded and considered;

3 reconsider the 24.4% residual exporter anti-dumping rate currently applicable to Huada;

4 consider granting Huada a lower company-specific anti-dumping rate where legally and procedurally available;

5 assess whether Huada may be examined individually or through another appropriate procedure to determine a rate reflecting its company-specific circumstances;

6 review the methodology, data, product comparability and adjustments underlying the residual exporter rate;

7 consider Huada's actual post-investigation-period exports to Australia and clarify how the rate applies to those and future exports; and

8 if a company-specific rate cannot be determined in the current investigation, clarify the applicable process and timing for Huada to seek an individual assessment, review or reassessment.

If post-investigation-period exports cannot be used directly in determining the dumping margin in this investigation, Huada respectfully requests that the Commission consider them as relevant supporting information and advise whether a separate assessment, review or reassessment may be available based on actual export transactions. If any additional information is required, Huada requests that the Commission identify the specific requirements and, where procedurally possible, provide an opportunity to respond.

Huada respectfully requests that these matters be considered before the final report is completed. The Company is committed to cooperating with the Commission and providing accurate and verifiable information.

In view of Huada's participation in the investigation, its submitted PIR response, its willingness to cooperate with further examination, and its actual exports to Australia after the investigation period, Huada respectfully requests that the Commission reconsider the rate applicable to Huada and, to the extent permitted by the applicable legislation and procedures, determine a lower rate that more appropriately reflects the Company's circumstances.

Huada appreciates the Commission's consideration of this appeal and respectfully requests that the above matters be addressed in the final report.

**Yours faithfully,**

**For and on behalf of**
**Shandong Huada Window Door and Curtain Wall Co., Ltd.**