Submission to the Australian Trade Remedies Commission

To:	Case Manager, Investigations 1, Australian Trade Remedies Commission
Investigation:	No. 691 – Aluminium windows and doors exported from the People's Republic of China
Submitted by:	Zhongshan Yaoguang Doors and Windows Co., Ltd. (exporter / manufacturer)
Date:	9 November 2026

Dear Case Manager,

I am writing on behalf of Zhongshan Yaoguang Doors and Windows Co., Ltd. (Yaoguang), a Chinese manufacturer of aluminium windows and doors supplied to the Australian market.

We would like to formally explain our company's background and seek clarification regarding our treatment under Investigation No. 691, particularly in relation to newly established manufacturers, exporter arrangements and the availability of an individual assessment or review.

1. Background of Yaoguang

Yaoguang was established in November 2025, approximately four months after the investigation period ended on 30 June 2025.

Prior to its establishment, Yaoguang did not exist as a manufacturing company and therefore had no production, sales, cost or export records during the investigation period from 1 July 2024 to 30 June 2025.

Our company commenced supplying aluminium windows and doors to the Australian market in early 2026.

We understand the importance of providing accurate information during an anti-dumping investigation. However, as Yaoguang was established after the investigation period, it was not possible for us to provide historical manufacturing or export data for that period.

We respectfully request that this circumstance be distinguished from a situation where an existing manufacturer or exporter has declined to cooperate with an investigation.

2. Background of Our Manufacturing Operations

Yaoguang was established to support the production of a proprietary aluminium window and door system known as the APS System.

The APS System was originally developed by PIA Windows, an Australian aluminium window and door business, with development commencing in 2024.

During the initial development period, manufacturing was outsourced to an existing factory in Zhongshan, China.

Following ongoing difficulties relating to the implementation of technical designs, production scheduling and quality control, a decision was made in November 2025 to establish a dedicated manufacturing operation.

Yaoguang was subsequently established to provide greater control over manufacturing processes, production planning, technical compliance and product quality.

Our company operates as a genuine manufacturer, rather than merely a trading entity established for export purposes.

We are prepared to provide supporting documentation relating to our company registration, manufacturing facilities, production equipment, employees, manufacturing records and quality control procedures.

3. Export Arrangements and Related Parties

For transparency, we would also like to explain our export arrangements.

Yaoguang manufactures the relevant aluminium window and door products in China. The products are sold through Chinese trading companies, which undertake the export transactions to Australia.

From approximately February to July 2026, the export arrangements were primarily handled through Jinan Jinzhou, a Chinese trading company under related ownership or control.

From approximately August 2026, our export arrangements changed to an independent trading company based in Suzhou, China.

Yaoguang does not currently export directly to Australia.

PIA Windows is the Australian business receiving the products and is related to the development and commercialisation of the APS System.

We wish to disclose these relationships openly and seek clarification on how the Commission assesses a manufacturer that supplies the Australian market through different exporting trading companies.

In particular, we would like to understand whether any individual assessment or review would apply to Yaoguang as the manufacturer, to a specific manufacturer-exporter combination, or to another arrangement determined by the Commission.

4. Participation in the Investigation

We understand that the Chinese aluminium window and door industry has participated in the investigation through relevant industry organisations.

However, Yaoguang did not submit an individual exporter questionnaire relating to the investigation period.

As explained above, Yaoguang did not exist during that period and therefore could not provide historical manufacturing, sales or export records.

We wish to make clear that our company is willing to cooperate fully with the Commission and provide all relevant information available from the commencement of our operations.

This includes production costs, material purchases, domestic and export sales, manufacturing records, related-party transactions and other supporting documents that may be required.

5. Request for Clarification and Guidance

In light of the above circumstances, we respectfully request clarification on the following matters:

1. How will Yaoguang be treated under Investigation No. 691, given that the company was established after the investigation period?
2. Would Yaoguang automatically be subject to the residual or all-other-exporters duty rate, or is another treatment available for a newly established manufacturer?
3. Is Yaoguang eligible to apply for an accelerated review, new exporter review or another form of individual assessment, either during the current proceedings or following the imposition of definitive measures?
4. If an individual assessment or review is available, what information and supporting documents would be required?
5. How would the Commission assess our export arrangements involving a previously related Chinese trading company and a subsequently appointed independent Chinese trading company?
6. Would any individual assessment or duty rate be specific to Yaoguang as the manufacturer, or would it depend on the identity of the exporting trading company?
7. Is there any action Yaoguang should take before the current investigation is finalised to preserve its ability to seek an individual assessment or review?
8. Can this correspondence and any subsequent supporting documents be placed on the official investigation record, subject to the applicable confidentiality requirements?

6. Our Position

We fully respect Australia's anti-dumping framework and the Commission's responsibility to ensure fair trading conditions.

Our objective is not to avoid legitimate duties or investigation requirements.

Rather, we seek an appropriate and fair assessment of a genuine manufacturing company that was established after the investigation period and therefore had no opportunity to provide the historical information requested during that period.

We are willing to cooperate fully with the Commission and provide complete and verifiable records of our manufacturing and export activities from the commencement of our operations.

We would appreciate your guidance on the appropriate next steps and any formal application procedures that may be available to us.

Thank you for your time and consideration.

Kind regards,

Shiqi Yang

On behalf of Zhongshan Yaoguang Doors and Windows Co., Ltd.

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