PUBLIC VERSION
RESPONSE TO STATEMENT OF ESSENTIAL FACTS

Investigation No. 691 – Aluminium Windows and Doors from China
Submitted by: Shanghai Jiangchuang Constructions Co., Ltd.

Australian Trade Remedies Commission
Date: 31 October 2026

Dear Sir/Madam,

Shanghai Jiangchuang Constructions Co., Ltd. (the “Company”) hereby submits its response to the Statement of Essential Facts in Investigation No. 691. This is the non-confidential (public) version of the submission, suitable for publication on the Electronic Public Record.

1. Request for Acceptance of Late Response

The Company respectfully requests that the Commission accept this late but complete response and have regard to it when preparing the final report to the Minister. Supporting data, including sales and cost information, has been provided in the confidential version.

2. Related Party Relationship

The Chinese exporter Shanghai Jiangchuang Constructions Co., Ltd. and the Australian importer Kingk Windows Pty Ltd are related parties under family control. The legal representative and majority shareholder of the Chinese company is the husband; the minority shareholder of the Chinese company and the sole director of the Australian company is the wife.

Any duty rate applied to the exporter will directly affect the viability of the Australian importer’s ongoing operations, including its warehouse and locally employed staff. A competitive duty rate is necessary to support the continued operation of this Australian business.

3. Export Sales and Price Evidence

During the investigation period (1 July 2024 to 30 June 2025), the Company exported aluminium windows and doors to Australia. Sales were made both to the related importer and to an unrelated Australian customer.

The unit price on the arm’s-length sale to the unrelated Australian customer was substantially higher than the unit price on sales to the related importer. Specific prices and contract details are provided in the confidential version. The Company submits that the Commission should have regard to this independent transaction when assessing the export price.

4. Cost of Production and Subsidies

The Company’s actual cost of production for the investigation period is supported by production records, material purchase invoices, project cost sheets, and the trial balance. Government subsidies recorded during the period were minimal. Factory premises are leased on ordinary commercial terms from a private lessor. Detailed figures are provided in the confidential version.

5. Production Capability and Product Compliance

The Company is a genuine producer and exporter. It holds ISO 9001 certification and an AS 2047 StandardsMark Licence SMK40852 (valid until 12 September 2029). Multiple Intertek test reports (including testing to AS 2047-2014) covering air infiltration, water penetration, structural performance and acoustic performance have been provided. Product technical specifications covering the main series of aluminium windows and doors are also available.

6. Requested Outcome

The Company requests that the Commission:

(a) accept this late response and the accompanying supporting materials;

(b) revise the Company's classification from uncooperative/residual exporter;

(c) calculate an individual dumping and subsidy margin based on the verified data now being provided; and

(d) have regard to the particular circumstances of the related Australian importer and the existence of higher-priced arm's-length export sales.

Yours faithfully,

Genquan Wu

Shanghai Jiangchuang Constructions Co., Ltd.