Submission to the Australian Trade Remedies Commission

Survey 691 - Aluminum Doors and Windows Feedback

Submitted by: Dosck Door and Window System (Suzhou) Co., Ltd.
No. 1397 Kangli Avenue, Lili Town, Wujiang District, Suzhou, Jiangsu 215200, China

Date: November 2, 2026
Subject: Formal submission feedback on accelerated review based on s269ZE (New Exporter)

1. Company Background

Our company is a professional high-end aluminum alloy door and window manufacturer and exporter, registered and operating in China. We independently complete product R&D, raw material procurement production, quality inspection, and factory delivery. The company is a genuine manufacturing enterprise, not a trading company or an intermediary distributor. We possess complete production facilities, stable production capacity a standardized management system, and an independent quality control system, fully qualifying for the manufacture and export of goods under 691 subheadings.

2. Zero Export Record during the Original Investigation Period

The original investigation period for Investigation 691 is **1 July 2024 to 30 June 2025.**
We formally declare and confirm that:

- During the entire original investigation period, our company had zero export records of subject aluminium windows and doors (finished products and semi-assembled parts) to Australia;
- There are no customs declaration records, no shipping records, no bill of lading records, and no cross-border foreign exchange collection records related to Australian customers for the subject goods during the investigation period;
- We have never exported any goods falling within the product scope of Investigation 691 to Australia through third-party traders, affiliated companies, or proxy export channels.

- Our company did not export the subject doors and windows to Australia during the investigation period, and therefore we have no export transaction data to Australia to provide at that time.

3. No Affiliation with Existing Respondents in Case 691

Our company confirms that we have no affiliation, no shared equity, no common actual controller, no shared production workshop, no cooperative OEM relationship, and no sales channel connection with any Chinese enterprises that have been investigated, sampled or ruled in the current Investigation 691.
Our production system, sales system, financial system and management team are completely independent. We do not belong to any group or associated entity involved in the original dumping and countervailing investigation.

4. Genuine New Export Intention and Valid Australian Order

Although we did not export to Australia during the investigation period, our company officially received an order from Australia in August 2026. The production has been completed and ready to be shipped to Australia, and we will also officially export qualified and compliant aluminum doors and windows to the Australian market. All export transactions will be conducted under normal market conditions following independent commercial pricing and normal operational logic.

For such a situation, what kind of margin or tax rate applies to us?

5. Compliance of Business Behaviour

Our company strictly complies with Chinese and Australian trade rules:

- No dumping behaviour;
- No acceptance of any prohibited or actionable government subsidies involved in this case;

- All product pricing is based on actual production cost and normal domestic and international market price level;
- All production processes and product quality strictly follow industrial standard requirements.

6. Request for Granting New Exporter Accelerated Review Qualification

Based on Section 269ZE of the Australian Customs Act 1901 and the relevant rules of accelerated review for new exporters:

- We satisfy the core requirement of no export during the original investigation period;
- We have no association with existing investigated enterprises;
- We have real Australian export orders and market demand;
- We are an independent genuine manufacturer.

We respectfully request the ATRC case team to accept our new exporter accelerated review application, conduct independent dumping and countervailing investigation on our company, and issue an individual separate duty rate applicable only to our enterprise.
Please ask the Commission to distinguish between the enterprises that made the first export and those that refused to cooperate with the investigation in the final report, and to state which margin of duty applies to the first batch of goods and whether there is a basis for applying a lower rate .

7. Truthfulness Declaration

We confirm that all information, statements and supporting documents submitted in this accelerated review application are true, accurate, complete and without concealment, omission or falsification. We accept any official verification, on-site verification and data review conducted by the ATRC.

Signature: Da Jiang Kang
Name: Da Jiang Kang

Position: General Manager

Company: Dosck Door and Window System (Suzhou) Co., Ltd.

Date: Monday, 2 November 2026