PUBLIC RECORD VERSION

3 November 2026

The Commissioner
Anti-Dumping Commission – Investigations Unit 1
Department of Industry, Science and Resources
Attention: Ms Neletta Lopa, Assistant Director, Investigations
By email: investigations1@adcommission.gov.au

Dear Commissioner

Investigation 691 – Aluminium windows and doors exported from the People's Republic of China
Submission in response to Statement of Essential Facts 691 on behalf of 佛山市德斯莱斯家居科技有限公司 (Foshan Zekin Windows and Doors Co., Ltd.)

1. Introduction

1.1 We act for 佛山市德斯莱斯家居科技有限公司 (Unified Social Credit Code 91440605MA528P2023), whose English name in its preliminary information request (PIR) response was given as Foshan Zekin Windows and Doors Co., Ltd. (the Company). Our letter of authority is at Attachment A.

1.2 This submission responds to Statement of Essential Facts 691 (SEF). It asks the Commissioner to:

(a) decide the Company's exporter status before the final report, and treat the Company as a residual exporter rather than an uncooperative exporter;

(b) accept the corrections to the Company's PIR response set out in section 4; and

(c) identify the Company in the final report and any dumping duty notice by its registered Chinese name and each English name in which it has traded, so that the correct rate is applied to its goods at the border.

1.3 The Company apologises for the errors in its PIR response. It brings them to the Commission's attention itself and in good faith, before the final report, so that the Commission can rely on accurate information.

2. Background

2.1 The Company is a recent exporter: it began export sales only in June 2024, and sells mainly through the Alibaba.com platform. It did not become aware of the investigation until after the PIR due date of 9 December 2025. On 10 March 2026 its then representative lodged the Company's PIR response and signed exporter declaration, explained why the response was late, and asked that the Company be treated as a residual exporter.

2.2 The Commission confirmed receipt the same day. It noted the reasons given for the delay, stated that it would revert in due course on the Company's exporter status, and stated that it did not request any additional information at that time (Attachment B).

2.3 The Company has received no further communication about its exporter status. The SEF does not record a decision on that question.

3. The Company should be treated as a residual exporter

3.1 Under section 269T(1) of the Customs Act 1901, an exporter is an uncooperative exporter where the Commissioner is satisfied that the exporter did not give the Commissioner information the Commissioner considered relevant within a period the Commissioner considered reasonable, or significantly impeded the investigation. Both limbs call for an evaluative judgment. Neither is satisfied by the PIR due date alone.

3.2 The Company submits that it should not be found to be an uncooperative exporter, because:

(a) it lodged a complete PIR response and signed declaration about seven months before the SEF was published, and the Commission accepted it without objection;

(b) the Commission stated that it required no further information, and has not since asked for any;

(c) the Company seeks only residual exporter treatment, not individual examination, so its late response does not affect the sample or the Commission's timetable;

(d) its exports to Australia in the investigation period were small – three orders [CONFIDENTIAL – volume] (section 4.3); and

(e) it consented in its declaration to full cooperation if selected, and it has now volunteered corrections and supporting documents.

3.3 The Commission told the Company it would revert on its status. Procedural fairness requires that, if the Commissioner proposes to find the Company to be uncooperative despite having accepted its response, the Company be told so and given an opportunity to respond before the final report is given to the Minister.

4. Corrections to the PIR response

4.1 Identity of the Company (PIR Questions 1 and 2)

4.1.1 The Company's registered name is 佛山市德斯莱斯家居科技有限公司. It is a limited liability company established on 11 September 2018, with registered capital of RMB 30 million. Its legal representative is Mr Shaopeng HUANG, and its business scope includes the manufacture of doors and windows. Its business licence is at Attachment C.

4.1.2 The PIR response gave only one English name and answered "N/A" to Question 2. That was incomplete. In its dealings with Australian customers the Company has used the following English names, each referring to the same legal entity:

- Foshan Zekin Windows and Doors Co., Ltd.
- Foshan Desilesi Home Technology Co., Ltd.
- Foshan Deslais Home Technology Co., Ltd.
- Foshan DSLS Home Furnishings Technology Co., Ltd.

It also uses the brand name ZEKIN.

4.1.3 The Company has two subsidiaries: Guangdong Zekin Doors and Windows Co., Ltd., a company incorporated in China, and ZHENGJIN DOOR AND WINDOW CO., LIMITED, a company incorporated in Hong Kong. [CONFIDENTIAL – details of the subsidiaries' role in the investigation period]

4.2 Export arrangements (PIR Question 9)

4.2.1 The Company answered "No" to Question 9 (exports through a trader or intermediary). That answer requires explanation. The Company obtains its Australian customers through the

Alibaba.com platform. In each case the Company manufactured the goods, negotiated the price directly with the Australian customer, issued the proforma invoice and received payment. The Company is therefore the exporter of the goods.

4.2.2 [CONFIDENTIAL – description of export customs arrangements, service providers and payment arrangements]

4.3 Exports to Australia in the investigation period

4.3.1 The PIR response stated exports to Australia in the investigation period of [CONFIDENTIAL]. Those figures were wrong. The volume figure included orders shipped in August 2025, after the investigation period ended. The Company's exports of the goods to Australia between 1 July 2024 and 30 June 2025 were three orders:

Customer	Shipped	Area (m²)	Value (USD)	Value (RMB)	Value (AUD)*
Customer A	25 Apr 2025	[C]	[C]	[C]	[C]
Customer B	16 May 2025	[C]	[C]	[C]	[C]
Customer C	9 May 2025	[C]	[C]	[C]	[C]
Total (as ordered)		**[C]**	**[C]**	**[C]**	**[C]**

** Converted at RMB 4.6817 = AUD 1, the rate used in the PIR response. [C] = confidential.*

4.3.2 [CONFIDENTIAL – adjustments to exclude items that are not the goods under consideration]

4.3.3 All three orders were sold on EXW Foshan terms. Proforma invoices, payment records and the bill of lading are at Attachment D (confidential).

4.4 Sales worksheet

4.4.1 The Company began export sales in June 2024, so it has little export data for calendar year 2024. The sales worksheet lodged with the PIR response should not be relied on. The 2024 column appears to state RMB amounts as AUD, and the unit values shown for domestic sales, exports to Australia and exports to other countries were allocations, not actual transaction values. [CONFIDENTIAL – unit values] A corrected worksheet, based on the Company's management accounts and the order documents, is at Attachment E. It replaces the worksheet lodged on 10 March 2026. [CONFIDENTIAL – turnover figures]

5. Requests

5.1 The Company respectfully requests that the Commissioner:

(a) accept this submission and its attachments, including the corrected worksheet;

(b) treat the Company as a residual exporter for the purposes of the final report;

(c) if the Commissioner proposes otherwise, notify the Company and give it an opportunity to respond before the final report is given to the Minister; and

(d) list the Company in the final report and any notice by its registered Chinese name and the English names in paragraph 4.1.2.

5.2 The Company remains willing to answer any question and to provide any further document the Commission requires. Please direct correspondence to the undersigned.

Yours faithfully

David Xue
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Attachments

A	Letter of authority
B	Email from the Commission dated 10 March 2026 confirming receipt of the PIR response
C	Business licence of 佛山市德斯莱斯家居科技有限公司
D	Order summary, proforma invoices, payment records, bank receipt and bill of lading for the three investigation-period orders (confidential – not included in public record version)
E	Corrected PIR sales worksheet (confidential – not included in public record version)