13 March 2026

Anti-Dumping Commission
Investigations 1
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Public File

Investigation No. 691 concerning Aluminium Windows and Doors from China

Dear Director,

As the Australian industry applicants to the above noted inquiry (**INV 691**) The Australian Glass Window Association (**AGWA**) and the Ventora Group Pty Ltd (**the applicants**) make the following submission.

1. Australian Industry Injury Update

The Ventora Group

In its submission of 7 January 2026, the applicants argued for the imposition of provisional measures as a matter of priority to mitigate ongoing material injury to the Australian industry as the investigation progresses.[1]

To further evidence this ongoing material injury to the Ventora Group Pty Ltd (**Ventora**), as an Australian industry member, the applicants provide updated Appendix A6.1 data for the period ending 31 December 2025. The data provides quantifiable evidence of a further six months of price depression, price suppression, and reduced profits and profitability. On an index and unit-actuals basis, the material injury experienced during the 6 months ending December 2025 has been significant.

This data is also additive to the Commission-verified Ventora data for the full INV 691 inquiry period, which evidenced material market share, price and profit effect injury.[2] In chart summary format, the price and profit effect injury over the full inquiry period, plus the six months following, can be shown as follows:[3]

[***Confidential charts deleted: Confidential Charts 1 – 4:*** *Updated Revenue, CTMS and Profitability Injury charts*]

The applicants maintain that this material injury can be squarely attributed to the Australian industry competing against dumped and subsidised Chinese AWD imports.

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[1] EPR folio no. 410.
[2] The applicants will make further representations on market share injury in due course.
[3] Refer Confidential Appendix A6.1, updated, as provided with this submission.

Other Industry members

AGWA submits the following evidence of examples of material injury sustained by other domestic AWD industry members, both during and subsequent to the INV 691 inquiry period. It is important to emphasise that this evidence continues to grow and compound, that the examples provided are illustrative only, and that they do not reflect the full extent of the material injury being suffered by the domestic industry. AGWA remains available to assist the Commission throughout the inquiry in substantiating the comprehensive and significantly injurious impact of dumped and subsidised Chinese AWD imports on the Australian industry.

Viewco

AGWA provides the following injury details for 'Viewco' a New South Wales based AWD fabricator:

[*confidential injury details deleted – excerpt 1*]
[*confidential injury details deleted – excerpt 2*][4]

CVD Windows & Doors

AGWA provides the following injury details for 'CVD Windows & Doors' a Sydney-based AWD fabricator:

[*confidential injury details deleted – excerpt 3*][5]

LGA

AGWA provides the following injury details for 'LGA' a Bunbry-based AWD fabricator:

[*confidential injury details deleted – excerpt 4*]

Packers

AGWA provides the following injury details for 'Packers' an Adelaide-based AWD fabricator:

[*confidential injury details deleted – excerpt 5*]

The urgent need for a PAD

These examples underscore the urgent necessity for a preliminary affirmative determination, as previously emphasised and petitioned for by the applicants, to stem the ongoing and escalating injury to the domestic industry while the inquiry is undertaken. With the final report not scheduled to be provided by the Commission to the Minister until 25 November 2026, the Australian AWD industry faces a considerable period during which it will remain exposed to the injurious effects of dumped and subsidised Chinese AWD imports.

[4] The *Australian Financial Review* article of 19 February 2026 is provided at Non-Confidential Attachment 4.
[5] The project details are provided at Confidential Attachment 5.

In the absence of provisional measures, the injury evidenced above will only continue to deepen, risking irreparable harm to domestic manufacturers and their capacity to compete in the Australian market. The applicants therefore reiterate their strong call upon the Commission to make a preliminary affirmative determination at the earliest opportunity.

2. Window Wall – a Type of AWD

Certain parties have asserted that window wall systems are fundamentally different from windows and should be excluded from the goods under consideration (**GUC**). The applicants submit however that this position is not supported by the relevant Australian Standards, applicable regulatory frameworks, or established industry practice.

In summary, window wall systems are properly classified as a type of AWD Australian Standard AS 2047 and fall squarely within the scope of the GUC. The attempt to characterise window walls as a distinct product category, akin to curtain wall systems, is a mischaracterisation of both the technical characteristics and the regulatory treatment of these products.

To assist the Commission in properly assessing whether window wall systems fall within the GUC, it is necessary to understand the technical distinction between curtain wall systems and window wall systems, including the scope of the Australian Standards as relevant to (AS 2047) and supposedly relevant to (AS 4248) this inquiry. Window wall and curtain wall are fundamentally different façade types, and only one of them – curtain wall – is excluded from the scope of AS 2047 and, by extension, from the GUC.

<u>Technical distinctions</u>

The specific 'Scope' of AS 2047 (*Windows and external glazed doors in Buildings*) is as follows:[6]

> *1.1 SCOPE*
> *This Standard specifies requirements, materials, construction, installation and glazing for external—*
> *(a) windows;*
> *(b) sliding and swinging glazed doors, including French and bi-fold doors;*
> *(c) adjustable louvres;*
> *(d) shopfronts; and*
> *(e)* ***window walls*** *with one-piece framing elements.*
> *NOTE:* ***Window walls do not include curtain walls*** *using stacked or vertically spliced framing systems, manufactured from any material and installed in external walls of all classes of buildings.* [**emphasis** added].

The specific 'Scope' of AS 4284 (*Testing of building facades*) is as follows:[7]

> *1 SCOPE*
> *This Standard sets out a method for determining the performance of a representative*

[6] Confidential Attachment 1.
[7] Confidential Attachment 2.

building facade under simulated conditions of loading. This Standard may be applied to all types of facades including low- and high-rise, commercial, industrial and residential buildings. Tests include displacement of the facade or prototype, water penetration and structural integrity at ultimate limit state as well as optional tests, including BMU restraint, seismic loading and seal degradation. This test method is applicable to prototype testing in a test facility and on-site testing.

These scope of AS 2047 necessarily informs an understanding of the GUC coverage in this inquiry. The scope of AS 4248 necessarily informs an understanding of the misrepresentations made in this inquiry to-date.

Defined – Curtain Wall

A curtain wall is defined as a non-load-bearing exterior wall system that is hung from the building's structural frame. It spans multiple floors and is designed to resist environmental forces (such as wind and seismic loads) while allowing natural light into the building. Curtain walls are extensively used in high-rise commercial towers and architecturally ambitious façades. Their key characteristics include: the wall is a continuous external system hung from the building structure (hence the term "curtain"); they provide large, uninterrupted glass façades; independent mullions typically span multiple floors; and loads are transferred back to the structure via anchors, not through the slab edge.

AS 2047 defines a curtain wall at clause 1.3.4 as "*a non-loadbearing wall of metal sections, glass and infill panels, which is carried directly by the structure of a building*",[8] with the accompanying note that curtain walls are extensively used in modern high-rise office buildings. Critically then, and by virtue of the above 'Scope', curtain wall is the only façade system explicitly excluded from the coverage of AS 2047.

Defined – Window Wall

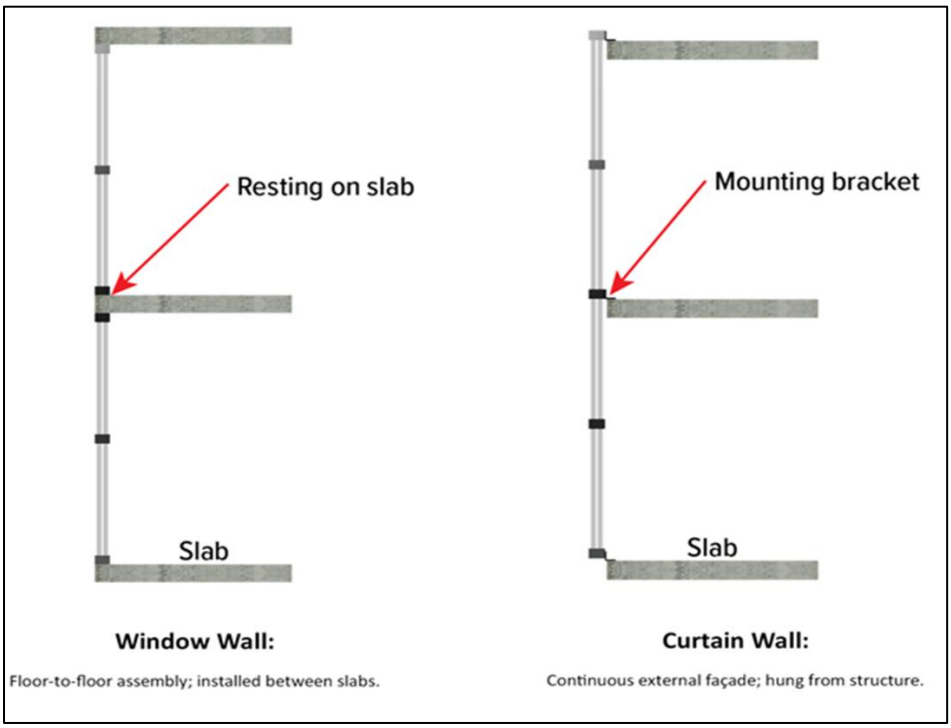
A window wall, by contrast, is a system of vertically oriented glazed units installed between floor slabs, typically anchored to the slab edge. It is commonly used in low- to mid-rise residential and hotel buildings where economy and construction timeframes are priorities. Window walls are installed floor-to-floor as individual frames or stacked units; they are anchored to the building's floor structure, with the slab acting as part of the support and alignment system; and clear slab-to-frame interfaces break continuity at each floor.

AS 2047 defines a window wall at clause 1.3.43 as "*a series of multi-light windows generally spanning from floor to ceiling, and often continuous horizontally*."[9] AS 2047 therefore identifies window walls as a series of windows, not as a distinct façade system.

Hence within the context of Australian regulation and practice, window walls are considered a variant of window, not a separate façade system. The only façade system explicitly excluded from AS 2047 is curtain wall, which is continuous and sits outboard of the building structure. As shown below window wall is, by contrast, discontinuous and sits between floor slabs.

[8] Confidential Attachment 1.
[9] Ibid.

To show diagrammatically:



Non-Confidential Diagram 1: Window Wall v's Curtain Wall – building placement

Testing and Compliance: AS 2047 and AS 4284

Certain representations place considerable weight on the claim that window wall systems are subject to different standards from those that apply to windows. The *Customs and Global Trade Law* submission, made on behalf of and multiple unrelated companies and 28 December 2025, specifically argues that because façade systems must comply with AS 4284 (Testing of Building Facades), this distinguishes window walls from windows tested under AS 2047.[10] In relevant part:[11]

> *As a façade system, window wall must comply with standards that do not apply to windows. Specifically, facades for each project must be tested to Australian standard AS 4284 Testing of Building Facades (AS 4284). Compliance with this standard is required for the façade to be compliant and to ensure the façade will protect the occupants from weather events and protect the building from the ingress of water.*

The applicants submit that this characterisation is incorrect and misleading. The relationship between AS 2047 and AS 4284 is complementary, not alternative. AS 2047 applies to windows and external glazed doors, including window walls, as discrete units of the building envelope. AS 4284, on the other hand, is a

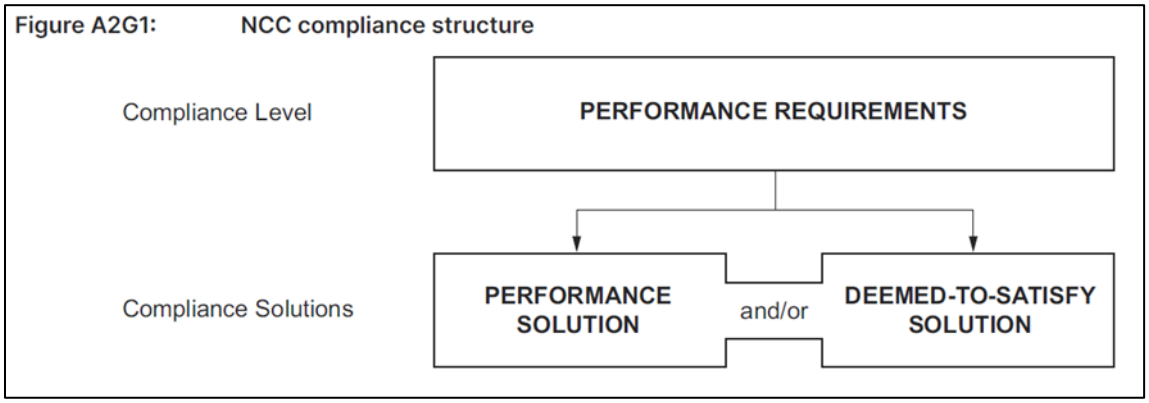
[10] EPR folio no. 409.
[11] Ibid, p. 2.

façade test standard used to verify the performance of the entire façade system, which may include windows of any type (including window walls), along with other elements such as flashings, cover-plates, slab edge covers (or in many cases the slab edges themselves), spandrels, and façade panels.

Window walls are tested under AS 2047 as stand-alone elements and may also be tested under AS 4284 as part of a complete façade system. This dual testing regime is not unique to window walls; it applies equally to any window or door that forms part of a façade system. The fact that a window wall may also be subject to AS 4284 testing when integrated into a broader façade assembly does not alter its fundamental product classification as a window under AS 2047.

The National Construction Code (**NCC**) provides two primary pathways to demonstrate compliance:

- Deemed-to-Satisfy (DTS) solutions, which set out prescriptive, standardised requirements; and
- Performance Solutions, which are bespoke and typically project-specific, used where building complexity or design intent falls outside the DTS framework.



Non-Confidential Diagram 2: NCC Compliance outline (Fig. A2G1 from the NCC)

Under the DTS pathway, the NCC mandates that all windows comply with AS 2047. By contrast, under the Performance Solution pathway, AS 4284 is referenced only in limited circumstances via verification methods, specifically NCC Volume 1 F3V1 and Volume 2 H2V1, and only in part. Importantly, these verification methods explicitly require that any windows included in the façade test must also comply with AS 2047, as illustrated in the NCC extract below:

> *Compliance with F3P1 for weatherproofing of an external wall is verified when—*
> *(a) a prototype passes the procedure described in (2); and*
> *(b) the external wall—*
> *(i) has a risk score of 20 or less, when the sum of all risk factor scores are determined in accordance with Table F3V1a; and*
> *(ii) is not subjected to an ultimate limit state wind pressure of more than 2.5 kPa; and*
> *(iii) includes **only windows that comply with AS 2047**.* [**emphasis** added].

Ultimately, AS 4284 is a façade system test, intended to assess the collective performance and interaction of multiple façade elements, not just the window, door, or window wall elements. This stands in stark contrast to the scenarios inferred by certain submissions to the inquiry where it is suggested that a window or window wall product can or should only be tested to AS 4284.

In practice, requirements to test to AS 4284 are typically driven by contractual or project-specific specifications, rather than by the minimum compliance obligations of the National Construction Code (NCC). The NCC establishes *baseline construction requirements* and, under both Volumes 1 and 2, requires AS 2047 compliance for windows in all circumstances, except where a developer or design team consciously elects to depart from the Deemed-to-Satisfy provisions and pursue a bespoke Performance Solution, or where the nature of the construction site wholly outside the NCC.

In those circumstances, AS 4284 operates as a contractual testing requirement, not as a minimum NCC compliance pathway. Where that election is made, the use of AS 4284 does not replace AS 2047 as a regulatory requirement; rather, it becomes an additional or supplementary (or often contractual) mechanism used to demonstrate the performance of a *specific façade system* over and above the regulatory minimum for the vast majority of buildings.

In light of the above, it is impractical to differentiate a product by means of the pathway chosen to demonstrate its compliance. In either case, the product typology is fundamentally unchanged. Therefore window wall, as a product type, is captured appropriately as the GUC.

Industry Practice

Industry practice confirms this interpretation. Numerous system suppliers provide systemised solutions and extensive catalogues of extrusions and components that can be assembled in a wide array of configurations, allowing for almost endless customisation. These are not always bespoke, project-specific designs; rather, they are modular systems that can be adapted to suit a range of applications, including window walls. The same extrusion profiles and hardware that are used in standard windows are frequently used in the manufacture of window wall systems, reinforcing the point that window walls are a configuration of windows, not a distinct product.

Functional and Market Considerations

Assertions that window walls are functionally different from windows is not supported by engineering or regulatory logic. Both windows and window wall systems are designed to accommodate a wide range of sizes, structural requirements (including wind load resistance), and configurations. Both may be manufactured and delivered to site in modular format for efficient assembly. The robustness of a window or window wall unit is a function of its size and the expected wind loads for the particular site, not an inherent difference in product type.

Larger windows, whether they form part of a window wall system or are installed as stand-alone units, require heavier sections and stronger materials to withstand higher wind speeds, particularly in high-rise applications. This represents a spectrum of performance, not a binary distinction between product categories.

The *Customs and Global Trade Law* submission further suggests that window walls are used only in NCC Class 2–9 buildings and not in residential housing, thereby implying a distinct market. This is factually incorrect. Window wall systems are used across a wide array of building classes, including Class 1 buildings (houses), where large window walls spanning several metres are increasingly common in contemporary residential design.[12] The relevant distinction is not the building class in which the product is used, but the grade and performance requirements of the product itself. Australian manufacturers produce window wall systems that compete directly with imported goods, and the scope of the GUC is not restricted to any single building class.

Australian Industry Capability

The scope of the GUC is therefore not restricted to products used in Class 1 structures. It covers all building classes. Numerous Australian manufacturers produce window wall systems that compete directly with imported AWDs. To exclude window wall systems would be to disregard the competitive impact of dumped imports on a significant segment of Australian manufacturing capability.

On the specific matter of whether the Australian AWD industry comprises fabricators who manufacture special and customised products (for example, arched and/or curved windows), AGWA confirms that *Bent & Curved Glass*, part of the *Cooling Brothers Glass Company,* has established and proven capability to manufacture bent and curved glass for window and door fabricators, in line with customer requirements.[13] On curved aluminium framing for Australian made curved windows, AGWA confirms that *All Metal Curving Specialists,* amongst others, maintains this capability to supply the curved or arched framing elements needed by local AWD fabricators to manufacture curved and arched windows.[14]

For and on behalf of the Australian Industry Applicants

[12] Non-Confidential Attachment 3.
[13] For further details, refer Confidential Attachment 6.
[14] For further details, refer Confidential Attachment 7.