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**COMMENTS REGARDING THE PROPER CHARACTERISATION OF CERTAIN
PRODUCTS OF THE
ANTI-DUMPING AND COUNTERVAILING INVESTIGATION OF ALUMINIUM
WINDOWS AND DOORS EXPORTED TO AUSTRALIA FROM THE PEOPLE’S
REPUBLIC OF CHINA**

ON BEHALF OF

ALTOP FACADE CO., LIMITED

(“ALTOP”)

JINGTIAN & GONGCHENG

15 MARCH 2026

CONTENTS

I. Case Overview	3
II. Overview of the Window Wall Systems	4
III. The Company’s Window Wall Systems Should Be Excluded from the Scope of the GUC	5
IV. Additional Considerations Regarding Exemption Under Section 8(7)(a)	6
V. Integrated Punch Windows within Window Wall Systems Should Be Exempted	7
VI. Conclusion and Requests	7

I. CASE OVERVIEW

This submission is respectfully filed on behalf of **Altop Facade Co., Limited** (“**Altop**” or “**the Company**”) in connection with Investigation 691, concerning aluminium windows and doors exported from the People’s Republic of China to Australia.

Altop is a specialised supplier of architectural facade systems for large-scale construction projects. Its principal products include engineered window wall facade systems, together with integrated punch windows designed specifically for building envelope applications. These systems are typically supplied as part of comprehensive facade packages for commercial or multi-storey residential developments.

Here, Altop respectfully submits that its **specialised window wall facade systems** should be treated as outside the scope of the Goods Under Consideration (GUC) in this investigation. As described in the public record, the GUC covers aluminium windows and doors, whether fully or partially assembled, including frames, sashes and panels, whether or not including glass, thermal breaks or hardware, and is subject to dimensional limits applicable to individual window and door components, while expressly excluding curtain wall products. In our submission, properly characterised window wall systems are not ordinary aluminium windows or doors within the meaning of that product description, but rather engineered facade assemblies forming part of the external building envelope, and are therefore more appropriately aligned with the category of facade products already excluded from the GUC. For that reason, our primary position is that window wall systems, together with their integral facade components, should be excluded on the basis of product scope.

PUBLIC VERSION

If, however, the Commission were minded to conclude that such systems are not excluded at the scope stage, Altop respectfully submits, in the alternative, that **they should nonetheless be excluded from the operative reach of the investigation through the applicable exemption mechanism.** Under section 8(7)(a) of the Customs Tariff (Anti-Dumping) Act 1975, exemption may be granted where like or directly competitive goods are not offered for sale in Australia to all purchasers on equal terms under like conditions having regard to the custom and usage of trade. As set out below, window wall systems are supplied into a distinct project-based facade market, are engineered to different technical requirements, and do not compete with standard residential aluminium windows and doors on equivalent commercial terms.

Accordingly, our submission proceeds on the following basis: **first, window wall systems, together with their integrated punch window components, do not fall within the proper scope of the GUC; second, and in any event, they warrant exclusion from the measures if the Commission considers that they have been captured by the wording of the GUC.**

II. OVERVIEW OF THE WINDOW WALL SYSTEMS

Window wall systems are widely used in contemporary high-rise construction as part of engineered facade assemblies that form the exterior building envelope. Unlike conventional windows, which are installed within pre-constructed wall openings, window wall systems are installed directly between structural floor slabs and operate as a continuous exterior facade.

In modern construction practise, window wall systems perform multiple functions simultaneously. They provide glazing for natural lighting, serve as the weatherproof exterior barrier of the building, and integrate architectural elements designed to conceal

PUBLIC VERSION

structural components of the building frame. These facade systems often incorporate opaque sections known as spandrels, which may consist of aluminium panels, terracotta cladding, or stone materials used to cover structural floor slabs, insulation layers, and other mechanical elements within the building envelope.

Because these systems are designed as structural facade assemblies rather than simple openings within walls, they must meet significantly higher performance requirements relating to wind load resistance, water penetration, and structure movement. As a result, window wall systems are typically engineered and fabricated specifically for individual building projects based on architectural and structural drawings.

These characteristics distinguish window wall systems from conventional aluminium windows, which are typically produced as standardised units intended for installation within residential buildings.

III. THE COMPANY'S WINDOW WALL SYSTEMS SHOULD BE EXCLUDED FROM THE SCOPE OF THE GUC

Having regard to the characteristics of window wall systems described above, as well as the Company's established business practises in their design, production, and supply to project-based markets, Altop respectfully submits that these systems should not be considered part of the GUC in this investigation. Properly characterised, window wall systems are distinct from conventional aluminium doors and windows and should therefore be excluded from the scope of the investigation.

These distinctions are further explained as follows: [Commercially Sensitive Information: detailed reasoning regarding the scope analysis and product characterisation]

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In summary, window wall systems represent a variant of the building facade enclosure system, performing integrated functions relating to enclosure, sealing, and overall facade appearance. In technical and manufacturing terms, they are therefore more closely aligned with curtain wall systems than with conventional aluminium windows and doors used in residential construction.

IV. ADDITIONAL CONSIDERATIONS REGARDING EXEMPTION UNDER SECTION 8(7)(A)

Even if the Commission were to determine that window wall systems fall within the GUC scope, Altop respectfully submits, in the alternative, that such systems should nonetheless be excluded through the exemption mechanism under section 8(7) of the *Customs Tariff (Anti-Dumping) Act 1975*. Under this provision, exemption may be granted where goods that might otherwise fall within the scope of the investigation **do not compete directly with domestic products, or where domestic producers do not offer comparable goods to all purchasers on equal terms under like conditions.**

As explained below, window wall systems differ materially from conventional aluminium doors and windows commonly supplied in the Australian market. These differences arise both from the absence of meaningful technical substitutability and from the structure of the relevant markets in which these products are supplied.

[Commercially Sensitive Information: detailed reasoning regarding the scope analysis and product characterisation]

This distinction is particularly important in the current construction environment. Where specialised facade systems are required for multi-storey residential and commercial projects, measures applied to such systems may reduce the availability of key building components and increase project costs without materially protecting the

PUBLIC VERSION

domestic residential window sector. In those circumstances, the inclusion of window wall systems would not reflect a market in which comparable domestic goods are offered on equal terms and under like conditions.

V. INTEGRATED PUNCH WINDOWS WITHIN WINDOW WALL SYSTEMS SHOULD BE EXEMPTED

In addition to the window wall systems discussed above, certain projects incorporate punch windows as localised openings within the broader facade envelope.

These elements function as integrated components of the facade system rather than standalone residential windows, and should therefore be assessed **consistently with window wall systems when determining the proper scope of the GUC.**

[Commercially Sensitive Information: detailed reasoning regarding the scope analysis and product characterisation]

For these reasons, punch windows, in any event, do not compete directly with residential aluminium window products supplied in the Australian market and shall be granted exemption.

VI. CONCLUSION AND REQUESTS

The comments above demonstrates that window wall facade systems differ fundamentally from standard aluminium windows and doors in terms of engineering design, functional role within buildings, applicable technical standards, commercial markets, production processes, and procurement structures. These differences indicate that window wall systems should not be considered “like goods” to conventional aluminium windows and doors typically supplied for residential construction.

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PUBLIC VERSION

For these reasons, Altop respectfully requests that the Commission consider explicitly excluding window wall facade systems, together with their integrated punch windows, from the scope of the Goods Under Consideration. In the alternative, should the Commission determine that these goods fall within the current scope, Altop respectfully submits that they should be granted an exemption pursuant to Section 8(7)(a) of the Customs Tariff (Anti-Dumping) Act 1975, as these products do not compete with Australian domestic residential window products under comparable market conditions.

Altop appreciates the Commission's careful consideration of these comments and remains available to provide any additional technical information that may assist the Commission in its assessment of the product scope in this investigation.



Luo, Xinqu

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Dated: 15 March 2026