

24 April 2026



**The Director  
Investigations 1  
Anti-Dumping Commission  
GPO Box 2013  
Canberra  
Australian Capital Territory 2601**

**By email**

Dear Director,

## **Investigation 691 – Aluminium windows & doors from China CCCMC response to submission from the applicants**

We make this submission on behalf of the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (“CCCMC”).

CCCMC takes this opportunity to provide some comments in response to the second submission made by the joint applicants (being AGWA and Ventora) of this investigation since its initiation, dated 13 March 2026 (“the Second Submission”).<sup>1</sup>

In essence, CCCMC respectfully submits that the Second Submission continues to defy basic procedural and evidentiary requirements under Australian law and the Commission’s specific directions for this investigation. The Second Submission also highlights the deficiencies of their application, as already identified in CCCMC’s submission dated 16 February. Separately, CCCMC provides its response to the applicants attempt to re-define the goods under consideration, with respect to “window walls”.

CCCMC respectfully requests that the Commission:

- disregard heavily redacted and non-compliant injury assertions in the Second Submission;
- decline the applicants’ request for any preliminary affirmative determination; and
- as soon as possible, provide clarity on the scope of the goods under consideration, particularly with respect to window walls.

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<sup>1</sup> EPR 691-426, published on 16 March 2026.

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**A The “injury update” extends the Application’s deficiency and non-compliance and must be disregarded**

**1 Non-compliance with section 269ZJ and the Commission’s clear directions**

The Second Submission claims to provide “updated data” for Ventora for the period ending 31 December 2025. The Submission then also tried to introduce new injury allegation “*sustained by other domestic AWD industry members*”, ostensibly concerning “Viewco”, “CVD Windows & Doors”, “LGA” and “Packers”, without any details.

Appallingly and concerningly, no details or any attempt to summarise that information and allegation were provided in the submission, other than repeating claims of the said injury assertions themselves, such as “*evidence of a further six months of price depressions...*”, “*injury charts*”, “*injury details deleted*”, and plain admission that the information presented in the submission is unexplained – footnoting that “[*t*]he applicants will make further representations on market share injury in due course”. This includes one instance, where the footnote to a deleted “confidential injury detail”, references a news article published by the Australian Financial Review. These are said to be “*examples [that] underscore the urgent necessity for a preliminary affirmative determination*”. Such claims are procedurally non-compliant and substantively unreliable. As already laboured in CCCMC’s submission dated 16 February 2026,<sup>2</sup> section 269ZJ of the *Customs Act 1901* (“the Act”) requires interested parties to provide non-confidential summaries of its submissions to the Commission. Specifically, section 269ZJ(2) provides:

*To the extent that information given to the Commissioner by a person is claimed to be confidential or to be information whose publication would adversely affect a person’s business or commercial interests, the person giving that information must ensure that a summary of that information:*

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<sup>2</sup> EPR 691-423.

*(a) that contains sufficient detail to allow a reasonable understanding of the substance of the information; but*

*(b) that does not breach that confidentiality or adversely affect those interests;*

*is given to the Commissioner for inclusion in the public record.*

This requirement is particularly relevant for the applicants of an investigation, who have an obligation to properly present the evidence of its claimed injury and causation. This is so that the claims can be understood and responded to by other interested parties, including exporters, importers, other industry members, and end users; and so that the Commission can carry out the investigation in an objective and unbiased manner, and to provide adequate procedural fairness and transparency for all stakeholders.

CCCCMC notes the Commission's commitment to this important element of procedural fairness and transparency, through this disclaimer provided on the Commission's website:<sup>3</sup>

*All of our cases are conducted in a transparent manner to allow all interested parties to present their views. We won't consider a submission where you haven't provided a non-confidential summary or a statement of reasons as to why a non-confidential summary cannot be provided.*  
[underlining supplier]

More specifically in this case, the Commission has also given clear direction concerning the proper disclosure required for interested parties' submission to be taken into account.<sup>4</sup>

*I have an obligation to publish submissions from interested parties and relevant correspondence where it relates to an investigation on the EPR.*

*I ask that parties provide their details, including name, contact details and whether they represent a particular business or company as an agent or otherwise, so that the commission can identify who is an interested party and the relevance of other correspondence to me.*

*Please note that where a person makes a submission or provides information but does not provide information to identify themselves or clarify who they may represent, I may not be able to ascertain if the person is an interested party or if the information is relevant, if the claim for confidentiality can be supported. It may also affect what weight, if any, I can place on that information. I require that where a claim of confidentiality is made over information provided in submissions or correspondence, that the person providing the information also submits a non-confidential summary so that the non-confidential version can be published enabling other persons the opportunity to respond to that information. Further information about the requirement to provide non-confidential summaries can be found on the commission's website.* [underlining supplier]

As identified above, the applicants Second Submission is deficient in its identification of the "other domestic industry members" and its representativeness of these entities. The excessively redacted submission under "Australian industry Injury Update" section is, with respect, carelessly defiant of the statutory requirement under section 269ZJ and Commission's specific direction with respect to the need

<sup>3</sup> How to lodge a submission in response to an anti-dumping or countervailing case, [Anti-Dumping Commission website](#).

<sup>4</sup> EPR 691-417.

to provide sufficient summary of any redacted information on a confidentiality basis. Meeting such requirement is fundamental to the due process of the investigation, and it allows the claims made by the applicants to be understood and under proper scrutiny of all interested parties.

Accordingly, in line with the Commission's practice of upholding procedural fairness, we respectfully request that the Commission disregard the applicants' submission under the "Australian Industry Injury Update" section. This is appropriate in light of their non-compliance with both the requirement for legitimate confidentiality claims and the need to include adequate non-confidential summaries.

## 2 No basis for a PAD

Likewise, the applicants' request for an "urgent" preliminary affirmative determination should also be dismissed.

Besides the absence of substance in the Second Submission due to excessive and improper confidentiality claims, the applicants' submission also continues to ignore the critical deficiencies in its Application – as highlighted in CCCMC's first submission in this investigation; and factors that the Commission has identified as critical to its assessment and consideration for any PAD, as stated in the Day 60 Status Report.<sup>5</sup>

CCCMC reiterates its concerns regarding both the insufficient evidence of industry standing, the representativeness of the applicants' claims and the scope of the investigation, as highlighted in its 16 February 2026 submission. Those deficiencies cannot be addressed by the applicants' casual introduction of four new "other domestic AWD industry members" in the Second Submission. The applicants' submission has failed to explain either relevance or significance of assertions made with respect to these four "members". It is also unclear whether any of these "members" are cooperating with the Commission's investigation, by way of lodging responses to the Commission's industry questionnaire. As far as the public record of this investigation is concerned, those four entities have not provided any independent or substantive evidence to the Commission.

Further, the applicants say that the continuing injury can be "squarely attributed" to dumped and subsidised Chinese imports. This falls far short of any empirical or logical analysis required for substantiating a claim which carries serious consequences for interested parties. The applicants have also not addressed alternative causes previously raised by CCCMC,<sup>6</sup> including corporate restructuring, debt and acquisition issues, shifts in demand and product mix, and other domestic market factors.

## B The applicants' newly invented definition of GUC is mischievous

The applicants' Second Submission asserts, for the first time in this investigation, that "*window wall, as a product type, is captured appropriated as the GUC*". This assertion is misconceived, and is a blatant attempt to alter the description of the goods under consideration ("GUC") of an investigation that is already underway. The Commission should, based on its long standing practice, reject such request.

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<sup>5</sup> EPR 691-417, page 4.

<sup>6</sup> EPR 691-423.

## 1 The GUC is defined by the application and the initiation notice only

It is a well established legal and practice position in Australia that the scope of the GUC is defined by, and only by, the description of the goods set out in the notice of initiation pursuant to section 269TC(4) of the Act, which sets out the “*particulars of goods the subject of the application*”. With respect to the scope of the goods, “*once set, the goods description cannot currently be amended*”.<sup>7</sup>

The particulars of the goods, as contained in the Commission’s section 269TC(4) notice, which is a precise replication of the “*imported goods from China the subject of this application*” as contained in the Application dated 29 October 2025, makes no reference to either “*window wall*” or any Australian standards. As such, contrary to the applicants’ assertion, the scope of AS/NZS 2047 or AS/NZS4284, and its references to “*window wall*” and “*curtain wall*” do not “*necessarily inform an understanding of the GUC coverage*”.<sup>8</sup>

Indeed, if the scope of the relevant standards were considered to be determinative of the scope of the GUC, then either the language adopted by the standards, such as AS 2047 which makes specific references to window wall and its inclusion; or the standards itself, should have been incorporated into the description of the GUC. However, as pointed out above, the Application made no reference to any Australian standards – nor did it use the same scoping definition of those standards.

In any case, the applicants’ reliance on the “scope” of AS 2047 is misplaced and misconceived. As stated in the Preface of AS 2047:

*The objective of this Standard is to provide window designers and manufacturers with a generic requirement for windows in buildings, setting out the performance requirements and specifications in the design and manufacture of all windows, regardless of materials [underlining supplied]*

At the risk of stating the obvious, the standard is generic and merely sets out performance requirements for windows in buildings of any kind. In contrast, the GUC as defined by the Application and the Commission’s initiation notice details its scope with precision, from specifying dimensions, to the materials which are captured by it. That is, the coverage and purpose of AS 2047 is clearly at odds with the purpose and function of “particulars of goods” stated in both the Application and the section 269TC(4) notice. It follows that the scope of AS 2047, or AS 2047 itself, without being expressly incorporated into the definition of the GUC, cannot be used to replace the definition of the GUC.

The applicants assert that, because AS 2047 made reference to window wall, then window wall must “fall squarely within the scope of the GUC”, despite the absence of any reference to window wall in the GUC description. This is absurd. The Commission will recognise that a mere reference to window walls AS 2047 cannot cause the expansion of GUC description in this anti-dumping investigation, when the “particulars of the goods” makes no such reference whatsoever.

In any case, the scope of AS 2047 does not support the applicants’ assertion. This is because, as shown in the AS 2047 scope, “window walls” is in fact treated as a distinct type of product from “windows” and “doors”. Further, AS 2047 refers to only a specific kind of window walls, being “*window walls with one-*

<sup>7</sup> *Strengthening Australia’s Trade Remedies System: Consultation Paper*, Australian Government, Department of Industry, Science and Resources, page 11.

<sup>8</sup> EPR 691-426, page 4.

*piece framing elements*". The scope then made explicit note to *exclude* certain "curtain walls" from "window walls", stating "[w]indow 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." The applicants' submission attempted to read those descriptions as if *any* window walls are covered, and that window walls do not include *any* kind of curtain walls by emboldening the word "window walls" and "curtain walls" only. Such interpretation technique is mischievous and can be easily rejected by reading the texts of the AS 2047 scope in full. Indeed, the fact that AS 2047 provides specific exclusion of certain curtain walls from "window wall" also suggest that window wall and curtain wall are considered to be the same type of product, being a type of "window wall". At the very least, they are considered to be closely related products due to their shared function as façade systems for buildings. As such, the applicants' belief that window walls and curtain walls have nothing to do with each other is a far cry from reality, and unsupported by AS 2047.

Further, AS 2047 itself contains multiple definitions of window walls and curtain walls, including:

#### 1.3.4 Curtain wall

*A non-loadbearing wall of metal sections, glass and infill panels, which is carried directly by the structure of a building*

#### 1.3.27 Panel wall

*A non-loadbearing window wall forming an infill between columns or within a frame and wholly supported at each storey by a beam, slab or structural projection.*

#### 1.3.43 Window wall

*A series of multi-light windows generally spanning from floor to ceiling, and often continuous horizontally.*

These product definitions provide clear contrast to the specific "window wall" reference contained in the scope section of AS 2047 and highlight that the usefulness of scope text in AS 2047 is limited, at best, for the purpose of determining if "window wall" answers to the description of the GUC.

Once again, we point out again that, unlike AS 2047, the *Particulars of the Goods* in section 269TC(4) notice made no reference to "window walls" at all. The initiation notice and the description of the goods in the Application that led to initiation must prevail in determining whether window walls fall within the scope of this investigation. As CCCMC already pointed out in its first submission, the only reference to "window wall", "curtain wall" or any "wall" products in the Application was in the context of the applicants seeking to rely on the Canadian investigation concerning "Unitised Wall Modules" (or "UWM") as a distinct but relevant case study for "AWDs".<sup>9</sup> In the applicants' own words, UWMs are not aluminium windows and doors, instead:

*...UWM goods can be summarised as follows:*

- *UWMs are an aluminium-framed engineered fenestration product which form the building envelope or facade for multi-story buildings.*
- *The two main styles of UWM building envelope systems are referred to as "curtain wall" and "window wall".*<sup>10</sup>

<sup>9</sup> EPR 691-1 (the Application), page 78.

<sup>10</sup> EPR 691-1 (the Application), page 79.

- *UWMs are prefabricated segments of the building envelope that interlock with each other when installed. They are manufactured and shipped to customers' building sites where they are installed by the customer or building contractor; and*
- *Installed UWMs separate the outdoors from a building's indoor environment. UWMs are designed to resist extreme wind pressures, limit air infiltration and exfiltration, prevent water infiltration and meet heat loss and energy usage criteria.*

*While large curtain wall and window wall systems differ from smaller windows and doors in terms of design, scale, and structural performance, they share fundamental similarities as they are primarily constructed from glass and aluminium extrusions. As both product types rely on these core materials, the applicants submit that an affirmative Chinese countervailable subsidy finding on UWMs logically extends to AWDs. [underlining supplied]*

Plainly, in the applicants' own words, the particulars of the goods are described to cover "smaller windows and doors", or "AWDs" and not "walls" or "UWMs". Even if a finding made with respect to UWM has a "logical" connection with AWD, such "connection" highlights the distinction between window walls and AWD, and does not suggest AWDs necessarily includes UWMs. If window walls were intended to be included in the scope of the GUC, then it would have been specifically identified and included. This is particularly the case when curtain wall "*products*" are specifically excluded and there is no reference to any other "wall" products in the GUC description.

The exclusion of window wall products is also supported by the applicants' own identification of the Model Control Code, which has been adopted by the Commission in the initiation notice. Here, too, products are categorized only into "door" and "window" under Category 1 "Door/Window", and various kind of "window" or "door" types under Category 3 – "Type":<sup>11</sup>

*The commission undertakes model matching using a Model Control Code (MCC) structure to identify key characteristics that will be used to compare the goods exported to Australia and the like goods sold domestically in the country of export.*

*The table below outlines the commission's proposed MCC structure for this investigation.*

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<sup>11</sup> EPR 691-2 (Notice – ADN, initiation), page 4.

Item	Category	Sub-category	Identifier	Sales Data	Cost Data
1	Door/ Window	Door	D	Mandatory	Mandatory
		Window	W		
2	Assembly	Fully Assembled	FA	Mandatory	Optional
		Partially Assembled	PA		
3	Type	Sliding window	ASW	Mandatory	Optional
		Fixed window	AFW		
		Awning window	AAW		
		Sliding door	ASD		
		Stacker door	ASTD		
		Louvre window	ALW		
		Other door	AOD		
		Other window	AOW		

Clearly, there is no reference made to “wall” or “window wall” at all. Logically, this is because the GUC and its control codes are intended to relate only to “smaller windows and doors”, and not “window wall systems”.

We respectfully submit that the omission of “window wall” from the GUC description, and the well recognised distinction between wall systems and “window and doors” mean that the applicants should not be allowed to revise the GUC description to expand the scope of the investigation to include window walls. Instead, it is open to the applicants to lodge a separate application with respect to “wall” products – provided that the applicants actually produce like goods to the wall products.

## 2 No evidence that Ventora produces window walls

Despite its insistence that window walls should be added to the scope of this investigation, nothing in the applicants’ submissions to date indicate that Ventora produce window wall systems, either for Class 1 or Class 2-9 buildings. Instead, the Second Submission simply asserts that “*numerous Australian manufacturers produce window wall systems that compete directly with imported AWDs*” without any details. It is also unclear whether any of these entities form part of the group of entities who claim to “represent” the Australian industry and are cooperating with the Commission’s injury assessment.

If the Commission is of the view that window wall falls within the scope of this investigation, then the Commission must request the applicants to properly disclose, on a non-confidential basis:

- The proportion of Ventora’s sales (if any) that are window wall systems by volume/value;
- A list of example window wall projects showing actual competition with imports from China; and
- whether the alleged injury case includes that segment.

### 3 No evidence of a domestic industry producing curved or arched windows

Separately, the Australian industry is made up of *fabricators* of AWD. Yet, with respect to curved AWD, the applicants cite two entities,<sup>12</sup> which appear to be suppliers of curved glass, rather than windows. This is not evidence that there is an Australian industry that produce curved or arched windows. Given the applicants' claims that curved or arched windows should be subject to measures, we request the Commission to require the applicants to identify, on a non-confidential basis, which entities of the Australian industry have this capability, and what evidence support its "material injury" claims.

### 4 AS/NZS 4284 points toward façade-system character of window walls

As established above, because the GUC description does not refer to any standards to assist with the product scoping, AS 2047 and AS/NZS 4284 are of limited use in determining whether window walls fall within the scope of the investigation.

On the other hand, the absence of "wall products" of any kind in the GUC description, apart from the exclusion section, suggest that UWMs, including window walls and curtain walls, are not covered by this AWD investigation. As the applicants acknowledge, AS/NZS 4284 is a *façade* test standard, not a standard ordinarily applied to the testing of "windows and doors". This lends to the differentiation of "window walls" and "window and doors". Interested parties, including CCCMC, pointed out to the common understanding in the industry that, curtain walls and window walls product are typically produced to meet AS/NZS 4284 standard, whereas it is not the case for "windows and doors".<sup>13</sup>

Whilst it might be correct to describe AS 2047 and AS/NZS 4284 as "complementary" in nature in that windows are eventually put onto a wall<sup>14</sup>, and that the wall will need to meet AS/NZS 4284, it does not mean windows and walls/façade are the same product.

### 5 UWMs are not AWDs

CCCMC has already provided a detailed comparison between window wall façade systems as a kind of UWMs, and the AWDs based GUC in its first submission.<sup>15</sup>

The applicants sought to depict window walls as merely a floor-to-floor arrangement of windows anchored to slab edges. This is over-simplified and omitted key differences between UWMs and AWDs. Window wall systems are designed to be anchored through top and bottom frames to the building structure, with articulated connections to accommodate settlement, slab deformation, inter-storey drift and thermal movement, and with interlocking mullion systems between adjacent units. In Australian practice, window walls for Class 2 and above buildings are commonly installed with sub-frames fixed to the building structure, in a manner materially different from the timber reveal installation more commonly

<sup>12</sup> Bent & Curved Glass and All Metal Curving Specialists.

<sup>13</sup> AS 2047, note 4 to section 1.1:

*For the performance specifications of building facades, see AS/NZS 4284. Conformance to the requirements of AS/NZS 4284 will be deemed to satisfy the requirements of this Standard, provided the windows have been tested to AS 4420.3 (operating force test).*

<sup>14</sup> EPR 691-426.

<sup>15</sup> EPR 691-423, page 12.

used in Class 1 housing. For projects involving 10-storey and above buildings, imported window wall systems are commonly installed through integrated anchoring to columns or shear walls, continuous façade installation across the elevation, or unitised prefabricated installation. The slab-edge floor-to-floor method is used only in a limited subset of low-rise projects. These are not trivial distinctions. They go directly to whether the products are properly understood as façade systems whose performance depends on system-level design and integration with the building structure – as compared to windows and doors. There are also substantial differences between AWDs and window wall façade systems in terms of profile weight, wall thickness, glass configuration, pane size and performance requirements. As an example, windows for Class 1 buildings are typically in the range of 1.2–2.5 kg/m for profile weight and 1.4–2.0 mm maximum wall thickness. In comparison, window wall façade systems would typically be in the range of 4.5–8.0 kg/m for profile weight and 3.0–5.0 mm in maximum wall thickness. That is, window wall façade systems typically have much larger glass sizes, mandatory insulating glass and low-emissivity requirements, and with materially higher wind, water, air and structural requirements compared to aluminium windows for Class 1 buildings.

## 6 Market segmentation remains highly relevant in injury analysis

If the Commission is minded to determine that window wall façade systems are a product that can be categorised as an aluminium window or door, and within the GUC definition scope, CCCMC requests that the Commission should maintain a segmented injury analysis approach that distinguishes ordinary residential AWD from project based façade-related products supplied into Class 2-9 markets. This is critical in the context that window wall façade systems for Class 2-9 buildings do not directly compete with punch windows for Class 1 buildings.

The applicants contend that window walls are used across a wide array of building classes including Class 1 houses, and that the relevant distinction is only one of performance. Even if some products described as “window walls” can appear in detached housing, that point does not address CCCMC and other interested parties’ submission that, window walls and a large number of other imported window and door products are predominantly used for Class 2-9 multi-storey building projects. Such products and projects simply do not compete in the same market as the AWDs produced by domestic industry producers as represented by Ventora, who produce and supply mostly in the Class 1 building market. If window walls are considered to be “like goods” to all the other AWDs used for Class 1 buildings, the applicants would effectively be asking the Commission to assess whether any dumping of, or countervailable subsidies received for imported window walls for Class 2-9 buildings, caused material injury to the domestic industry’s supply of AWDs for Class 1 buildings. The answer would be a clear “no” – because they are distinct products supplied in distinct market segments.

On the other hand, and to the extent that the question of injury and causation relate to any UWMs supplied for Class 1 buildings which do compete with AWDs for Class 1 buildings, this may require the Commission to carry out more detailed market and competition analysis. This would be for the purpose of evaluating the competitive dynamics of these distinct products at the same market level based on building types, being Class 1 buildings. In this context, the Commission will at least be able to limit the assessment to only products supplied for Class 1 projects in order to ensure accuracy and relevance. However, CCCMC observes that there is currently no available evidence or claim made by the applicants that would allow such assessment to be made, with respect to only UWMs supplied for Class 1 buildings.

## **C Conclusion**

For the reasons set out above, CCCMC respectfully requests that the Commission to:

- give no weight to the “Australian Industry Injury Update” in the applicants’ submission;
- reject the applicants’ attempt to re-write the GUC scope with respect to window wall façade systems; and
- confirm that window wall façade systems are not within the scope of this investigation.

CCCMC would be pleased to provide any further information the Commission may require.

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**For and on behalf of China Chamber of Commerce of Metals,  
Minerals & Chemicals Importer & Exporters**

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