Australian Government
Department of Industry, Science and Resources

Anti-Dumping Commission

Dumping and Subsidy Investigation 691

Aluminum Windows and Doors

Exported from the People's Republic of China

File note

Meeting with China Chamber of Commerce of Metals Minerals and Chemicals Importers and Exporters

The China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC) requested a meeting with the Anti-Dumping Commission (the commission) to discuss its submissions in relation to dumping and subsidy investigation 691 into aluminium windows and doors (AWD, the goods) exported from the People's Republic of China (China).

The CCCMC is an interested party in relation to this investigation. On 25 June 2026, the commission held a meeting at the Commission's head office in Melbourne with representatives from CCCMC, Moulis Legal representatives and members of the broader delegation which CCCMC represents.

The CCCMC's delegation also included:

- Exporters of aluminium windows and doors
- Representatives of municipal, provincial and State level government commerce departments
- Chinese law firms including Zhong Lun Law Firm, Jingtian & Gongcheng and Allbright Law Offices.

The purpose of the meeting was to discuss the issues raised by the CCCMC in its submissions made in relation to investigation 691.[1]

During the meeting the CCCMC discussed key issues regarding Investigation 691 including its views that:

- the domestic industry's identity, representativeness, and standing remains opaque and questionable due to excessive redaction and the templated submissions on the public record.
- there is no "particular market situation" ("PMS") in China's aluminium window and door industry, which is fully competitive and overwhelmingly consists of small, medium and micro private enterprises.

[1] EPR 691 document nos. 423 and 436

- window walls should not be considered to be within the scope of the goods under consideration and are clearly distinguishable from “window and door” units that are explicitly identified in the application.
- the current goods description captures products that are not manufactured, or are not manufactured to scale by Australian industry members, in particular with respect to large-size, high-specification and complex-process products, whereas Australian industry primarily services low-rise residential construction.
- the Australian industry does not currently service all market segments captured by the goods description, particularly certain commercial, high-rise and project-specific applications. There is distinction between residential and commercial/high-density residential market segments and that that these segments operate with different product specifications, technical requirements, and supply chains.
- imported products fill a supply gap in these segments and provide specialised products, scale, and technical capability that are not readily available from Australian industry members.
- Injury and causation analysis should fully account for product segmentation and market dynamics, noting other public record submission observations that the Australian industry does not meaningfully service all market segments captured by the goods description. There is distinction between residential and commercial/high-density residential market segments, and these segments operate with different product specifications, technical requirements, and supply chains.
- the Commission should give due consideration to the dynamics of competition in the relevant market to consider competition as between imports and domestic suppliers, imports amongst themselves, and domestic suppliers amongst themselves
- it is relevant to undertake an end-user demand and preference based analysis in the AWD market.
- as imports play a significant role in supplying commercial and high-rise projects, this investigation poses significant downstream effects on builders, developers, and consumers where imports are meeting demand that cannot currently be met by domestic manufacturers.
- performance fluctuations of the Australian industry are explained by various non-import factors, including the Australian industry’s own acquisition and resulting financing structure, changes in consumer preference for higher efficiency standards, and the high and increasing cost of production.
- the Commission and the Minister should consider the broader public interest implications of applying an anti-dumping measure, including potential consequences and risk of measures on the commercial construction sector, impacts on project costs, procurement options, housing supply, and broader construction activity, particularly where domestic producers are unable to supply all market segments.

The commission provided a general overview of the status of the investigation, consistent with the details of EPR 691, and noted that the Commissioner’s preliminary findings relating to investigation 691 will be published in the statement of essential facts (SEF) which is currently due on **23 September 2026.**

The commission invited the CCCMC to provide further information via submission and noted that the CCCMC will have the opportunity to make submissions in response to the SEF. The commission also advised that it will consider any post-SEF submissions when forming its final recommendations to the Minister.