



Dumping and Subsidy Investigation 691

Aluminum Windows and Doors

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File note

Meeting with Altop Façade., Co Ltd

Altop Façade Co., Limited (Altop Façade) requested a meeting with the Anti-Dumping Commission (the commission) to discuss dumping and subsidy investigation 691 into aluminium windows and doors (AWD, the goods) exported from the People's Republic of China (China).

Altop is a selected exporter for the purposes of this investigation and manufacture the goods in China.

On 25 June 2026, the commission held a meeting at the commission's head office in Melbourne with representatives from Chinese law firm Jingtian & Gongcheng, representing Altop. The purpose of the meeting was to discuss the issues raised by Altop in its submissions made in relation to investigation 691.¹

During the meeting Jingtian & Gongcheng delivered a presentation to commission representatives. A non-confidential version of this presentation has been published accompanying this file note.²

The presentation outlined the following:

- Altop reiterates its position that its window wall façade systems should be excluded from the scope of goods and notes that window wall systems are engineered façade assemblies forming part of a building's external envelope, rather than conventional aluminium windows or doors. Specifically, window wall systems do not directly compete with conventional residential aluminium windows and doors and are supplied into a separate market with different technical specifications, procurement processes and commercial conditions.
- Altop reiterates it is a supplier of specialised architectural façade systems, including window wall systems and integrated punch windows used in commercial and multi-storey residential construction projects.

¹ EPR 691 document no. 430

² EPR 691 document no. 443, Non-Confidential Attachment 1 – Altop Presentation.

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- Altop's products are specialised façade systems that are not "like goods" to conventional residential aluminium windows and doors due to differences in design, function, technical requirements, manufacturing processes, end-use and market characteristics. In its presentation, Altop provided diagrammed/pictured examples of the goods its manufactures.
- As in its submission Altop also seeks an exemption under section 8(7)(a) of the *Customs Tariff (Anti-Dumping) Act 1975* should the commission determine that window wall is a like good to AWD.

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 Altop to provide further information via submission and noted that its request for an exemption should be provided as an individual submission for placement on the EPR. The commission reiterated that Altop 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.