

Case 691

Product Scope & Exclusion Hearing

Altop Facade Co., Limited | Hearing Presentation

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Investigation 691 Case Brief & Overview



Initiation of Investigation

Launched on 25 November 2025, following a formal application submitted jointly by Ventora Group and AGWA to the Commission.



Core Application Objective

Seeks the imposition of anti-dumping and countervailing duties on imports **of aluminium windows and doors (AWDs)** originating from China, alleging unfair trade practices.



Scope of the Goods (GUCs)

The application defines the subject goods as all fully or partially assembled aluminium-framed window and door products, encompassing a broad range of finished and semi-finished items.



Altop's Participation & Clarification

Actively engaging to demonstrate **that Altop's specialized window wall facade systems** and integrated components are distinct from standard, ordinary aluminium windows and doors.

Altop Facade Pty Ltd



Altop supplies facade systems, not catalogue residential window units. Our focus is on engineered, high-performance solutions tailored for complex building envelopes.



CORE POSITIONING

Specialized supplier of architectural facade systems for large-scale commercial and multi-storey residential developments.



KEY PRODUCTS

Engineered window wall facade systems featuring integrated punch windows and system-matching sliding doors for seamless design.



APPLICATION SCOPE

Tailored for building envelope applications in NCC Class 2–9 projects, excluding standard Class 1 residential housing.



BUSINESS MODEL

Project-specific service: from design coordination and shop drawings to fabrication, delivery and ongoing technical support.

Goods Under Consideration: Scope and Boundary

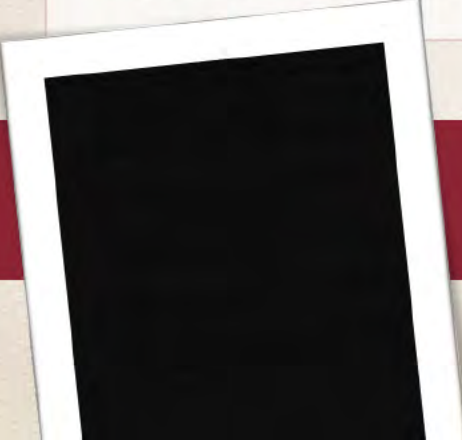
❖ Products Covered

Aluminium windows and doors (fully or partially assembled), including frames, panels and sashes (with or without glass, thermal breaks or hardware). Specific size limits apply: **window assemblies** up to 3.0m high × 4.0m wide; **door assemblies** up to 3.0m high × 7.0m wide.

🚫 Products Expressly Excluded

“Excluded are curtain wall products.”

This exclusion confirms the investigation is not directed at **engineered facade systems**. The scope must be interpreted by the product description, not solely by tariff classification codes, ensuring clarity on what falls outside the GUC’s remit.



The application excludes curtain wall products from the GUC.

Description of GUCs: Aluminium Doors and Windows

GUC products are individual windows/doors; they are not facade assemblies.



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Altop's Architectural Solutions



[Redacted text]

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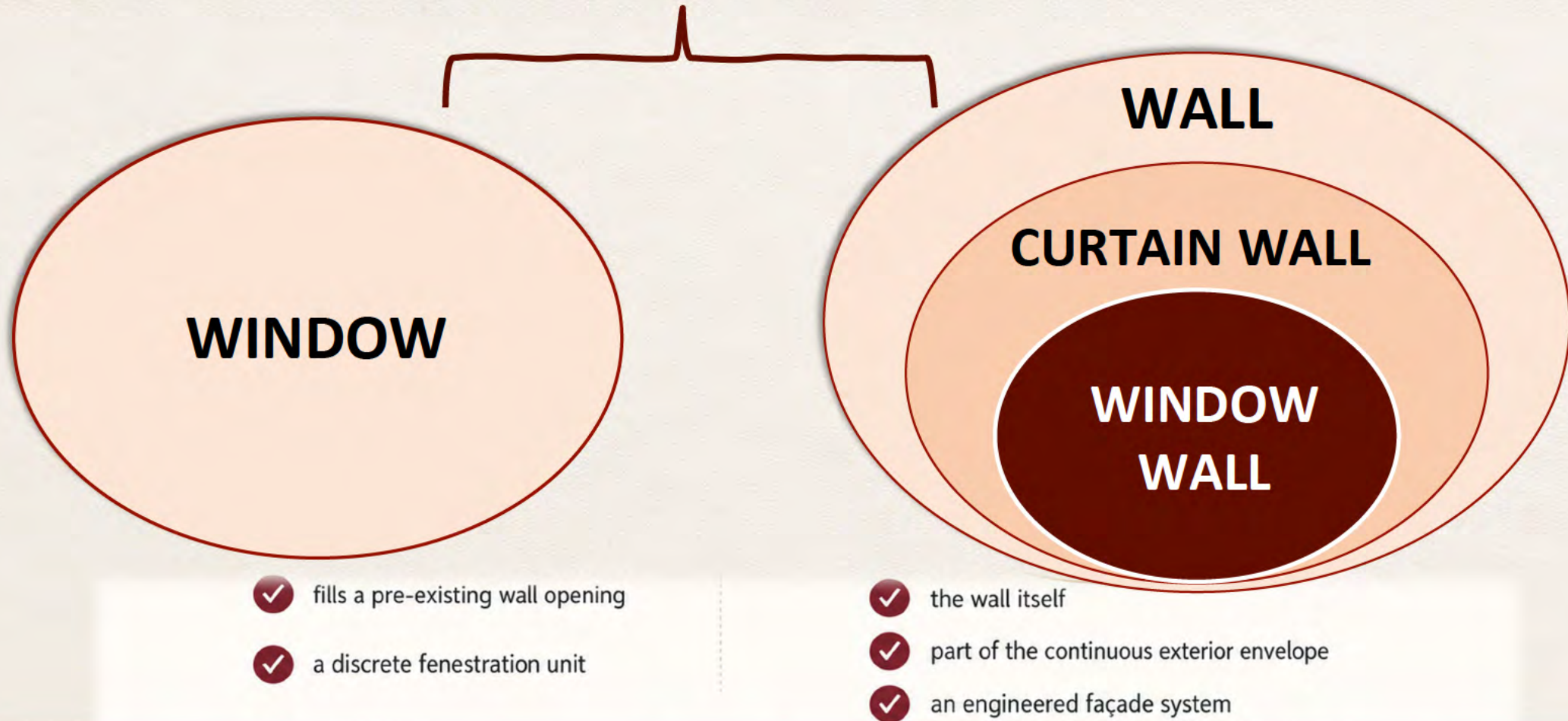


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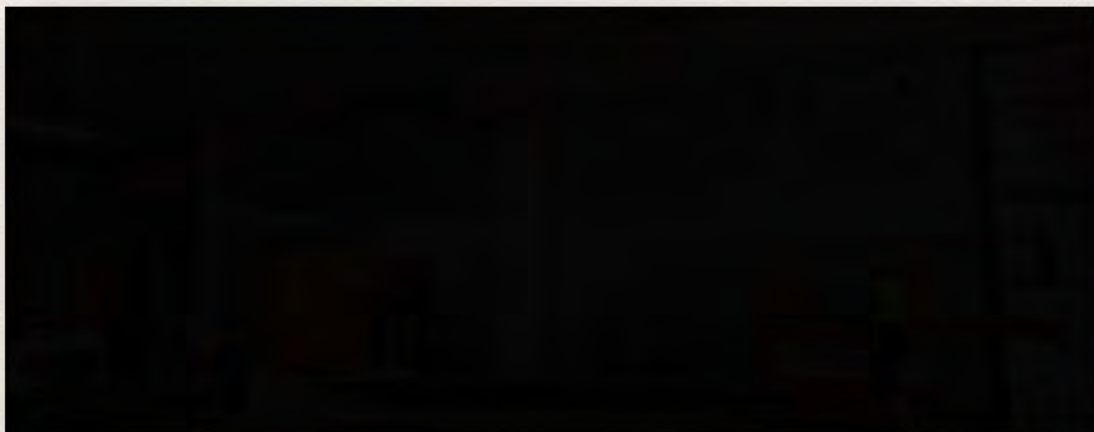
The product is designed as part of a building envelope, not as a retail window unit.

ENVELOPE SYSTEM



The product is designed as part of a building envelope, not as a retail window unit.

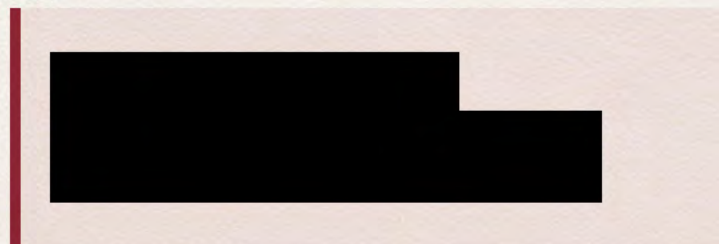
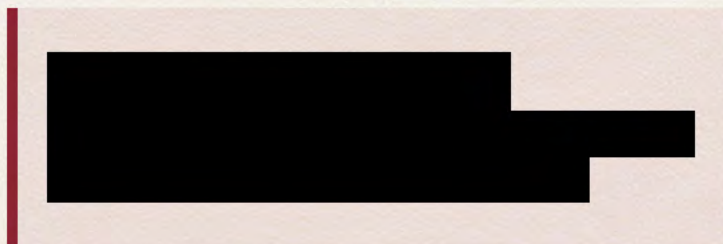
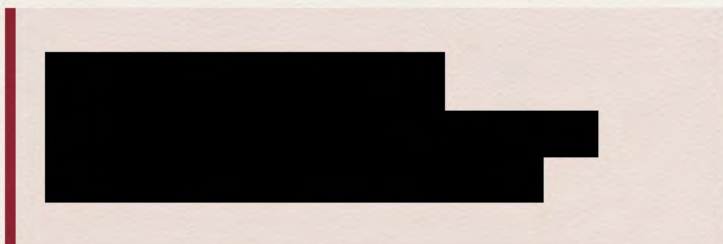
Defining the “Window Wall”: Window Wall is the Wall Itself



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“Window Wall” is a Type or Component of “Curtain Wall”

[REDACTED]



[REDACTED]

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International Recognition: The Canadian UWM Precedent



International practice draws the same distinction: facade systems are not catalogue windows. The engineering and integration required for unitized wall modules (UWM) firmly place them outside the scope of standard fenestration products.

The Canadian CBSA/CITT proceedings recognize curtain walls and window walls **as specialized engineered building-envelope systems for multi-storey construction**, rather than ordinary off-the-shelf windows or doors.

This classification supports Altop's position that window walls belong within the excluded facade-system family.

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POSITIVE CHARACTERIZATION

Physical, functional, commercial and production differences

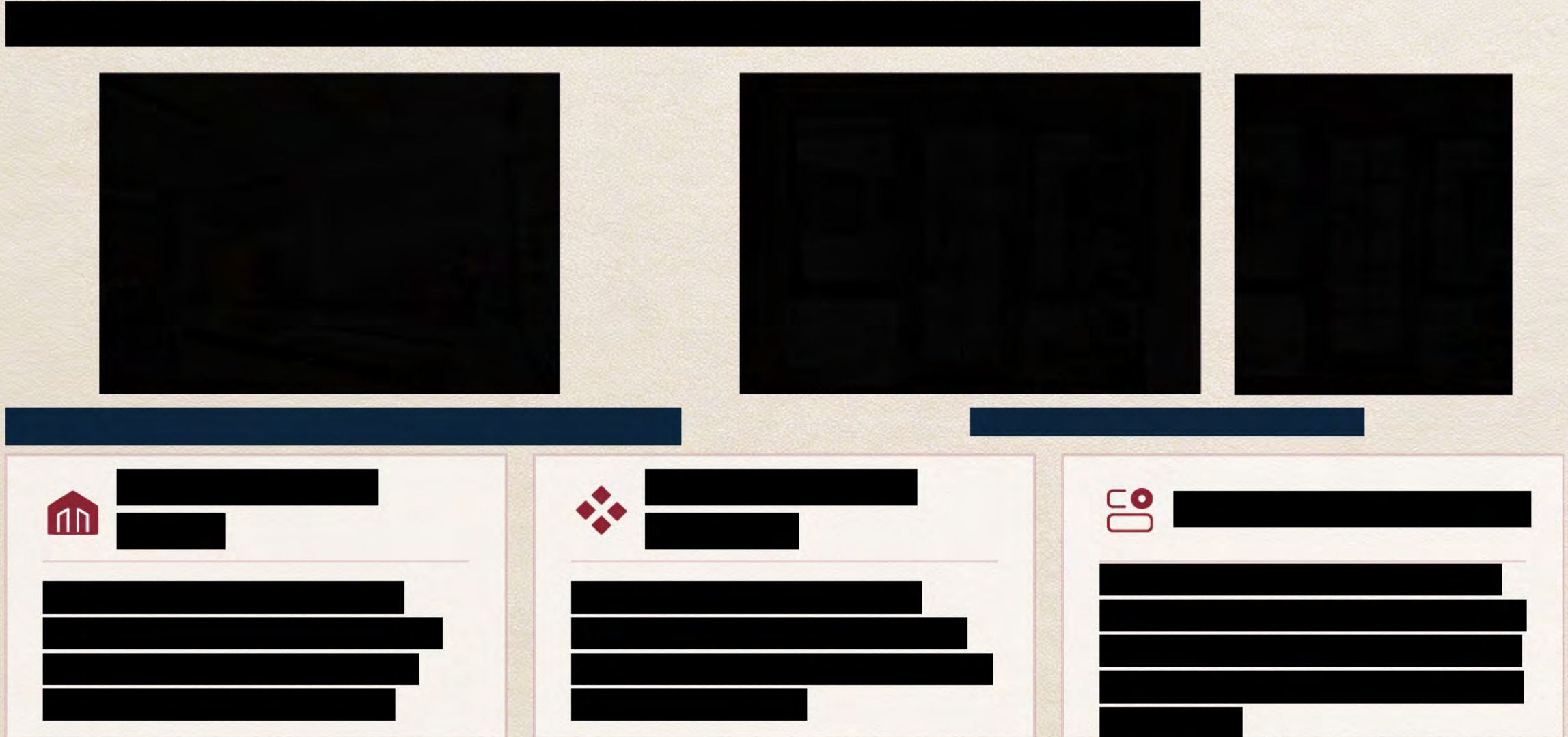
The distinction is reinforced by every practical attribute
of the product.

Scope Exclusion: Physical, functional, commercial and production differences

Why window walls do not fall within the ordinary AWD scope

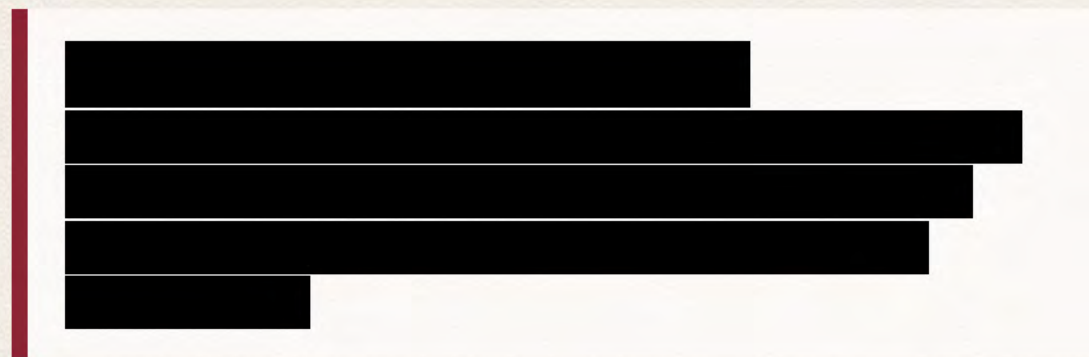
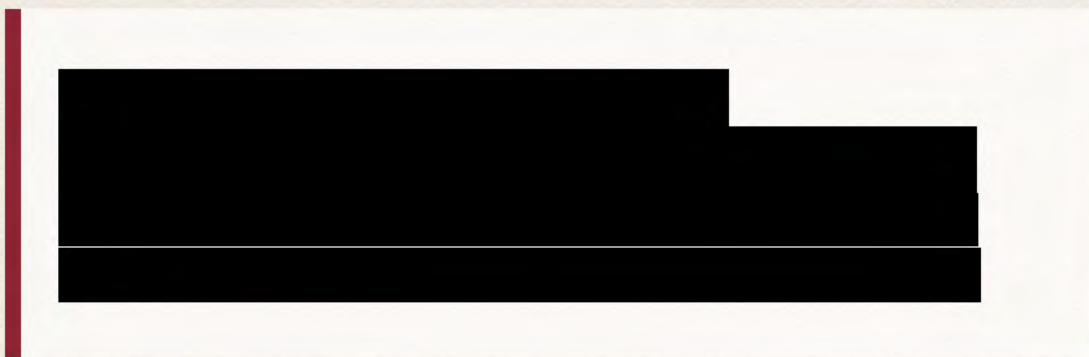
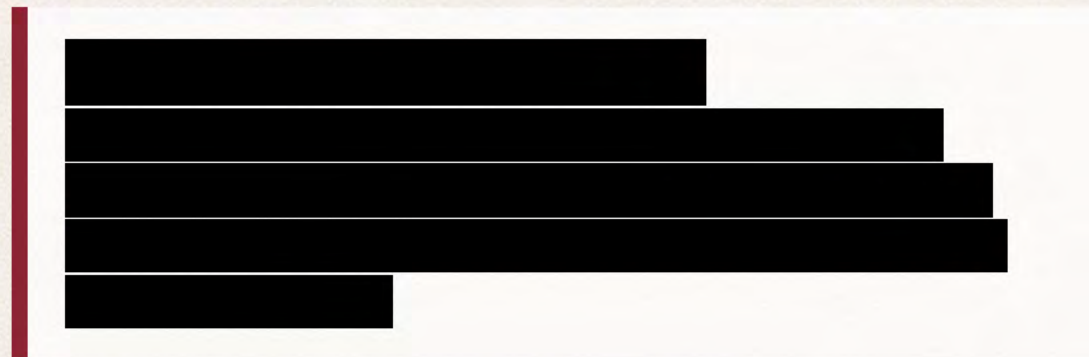
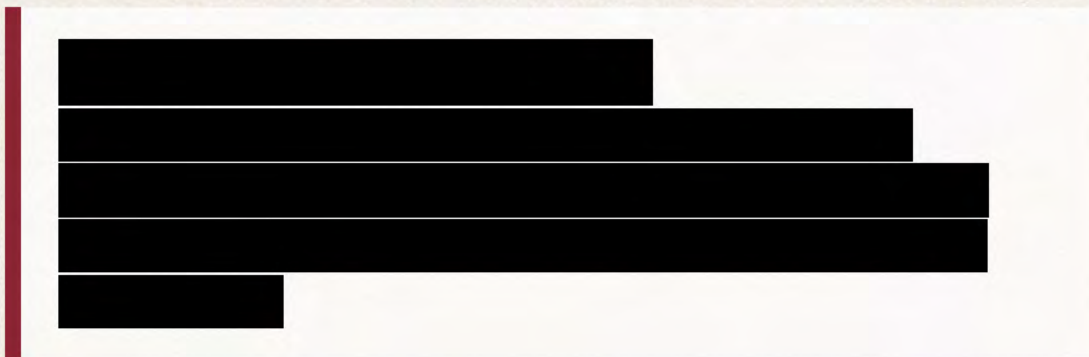
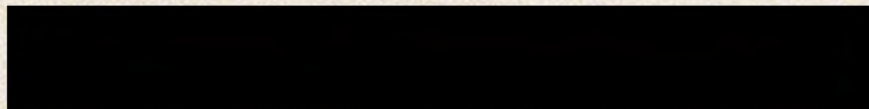


1. Physical Characteristics: Slab-to-Slab vs Hole-Filling



Window walls form the exterior building envelope; standard windows fill openings.

1. Physical Characteristics:

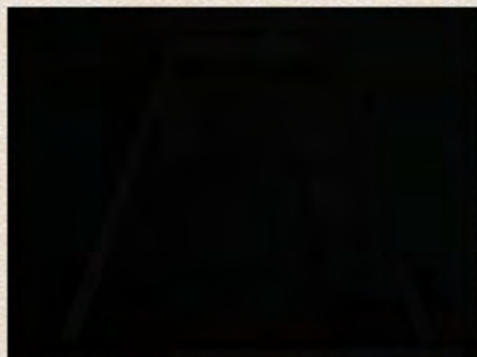


The product exceeds not merely the dimensions but the logic of individual window/door assemblies.

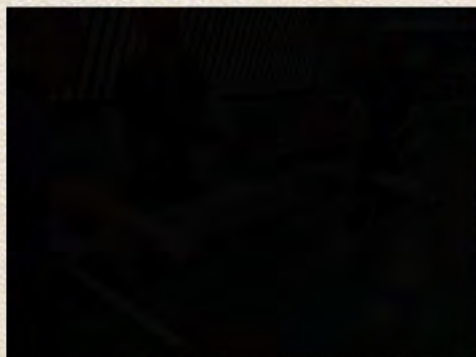
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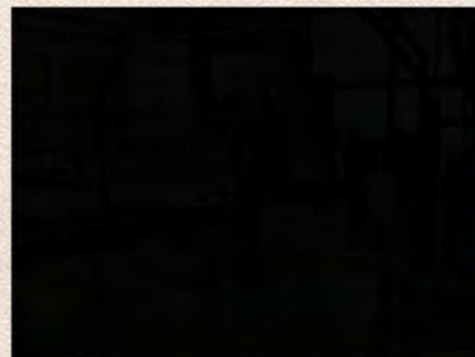
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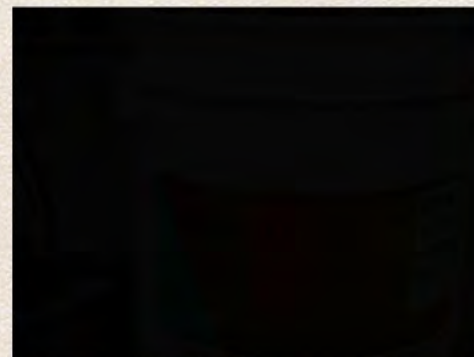
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1. Physical Characteristics:

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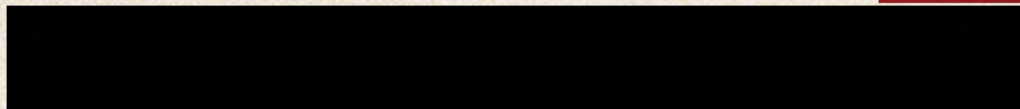
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2. Functional Characteristics:

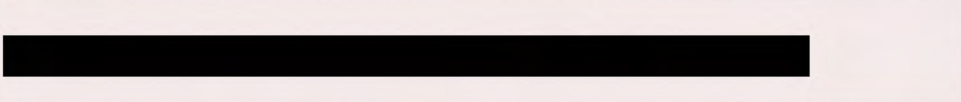








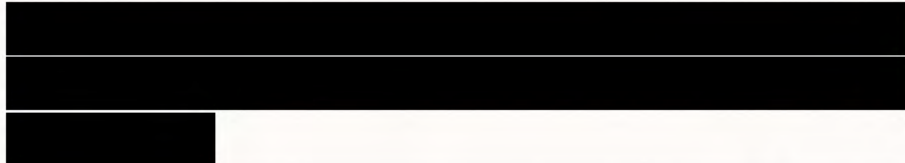


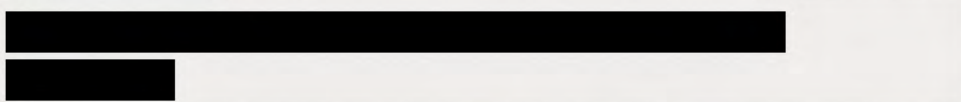


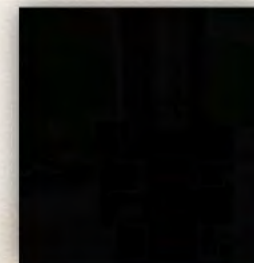
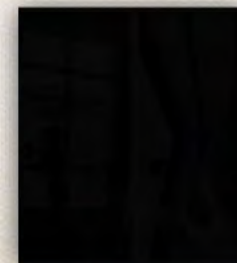
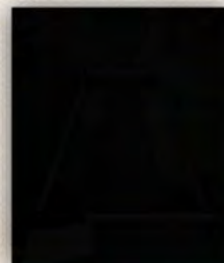
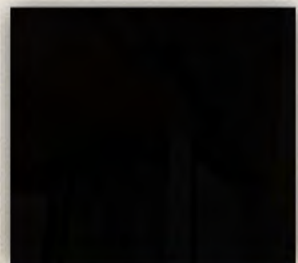
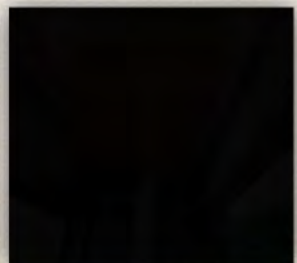




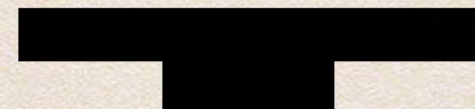
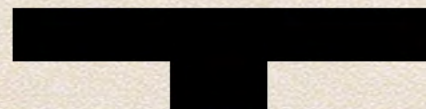
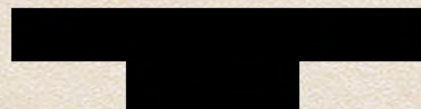
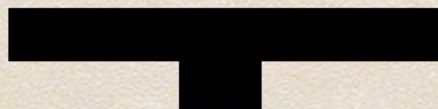
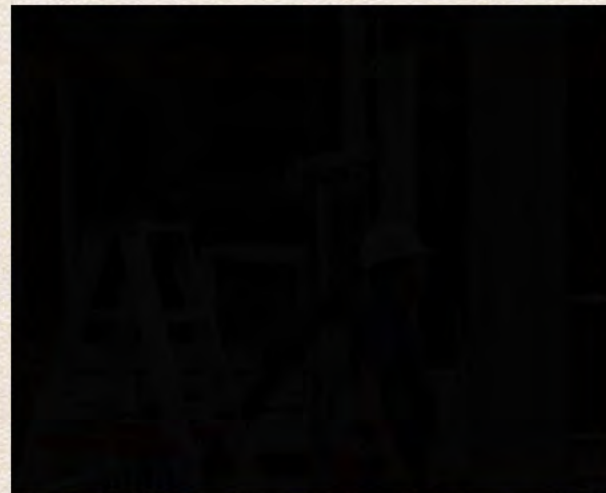
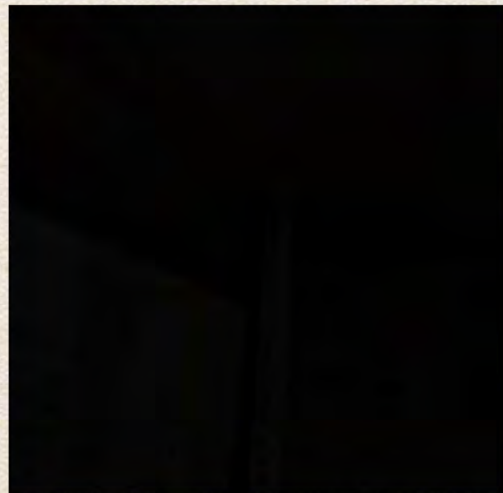








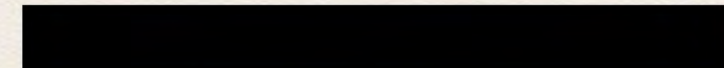
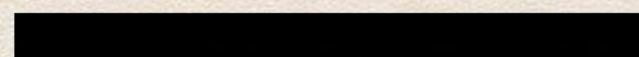
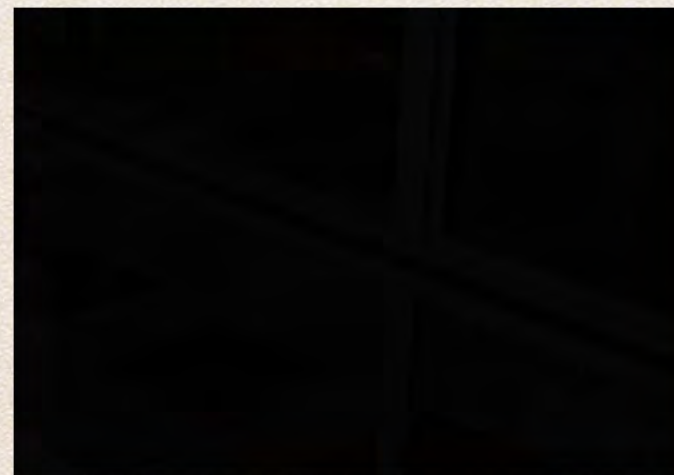
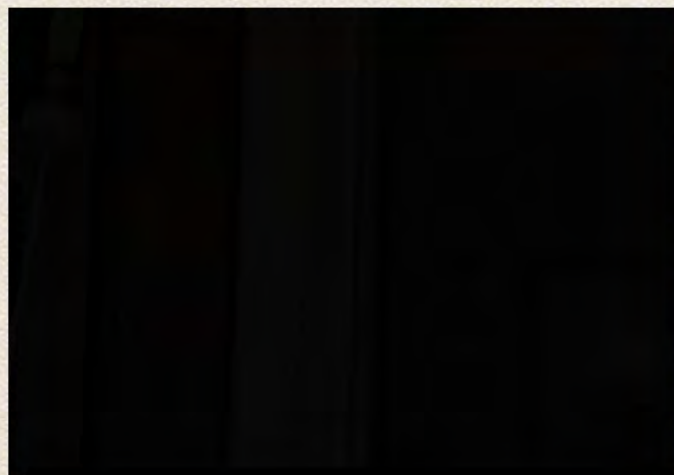
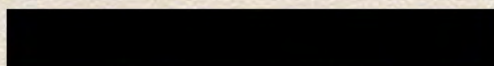
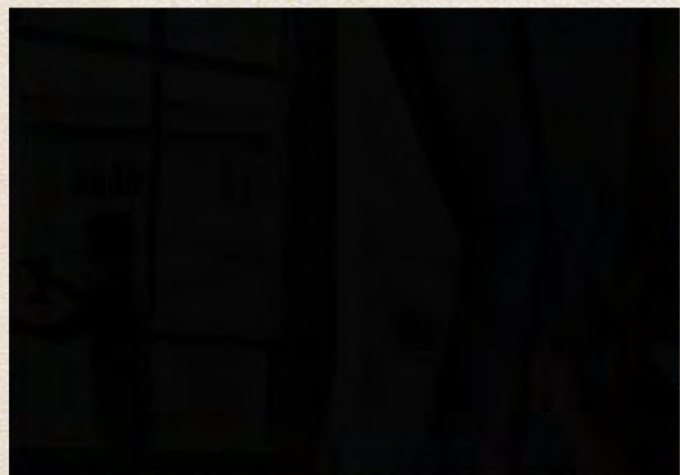
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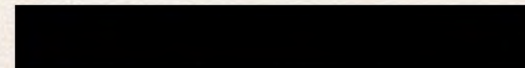
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Ordinary windows do not accommodate high-rise structural deformation

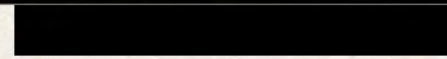
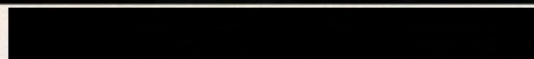
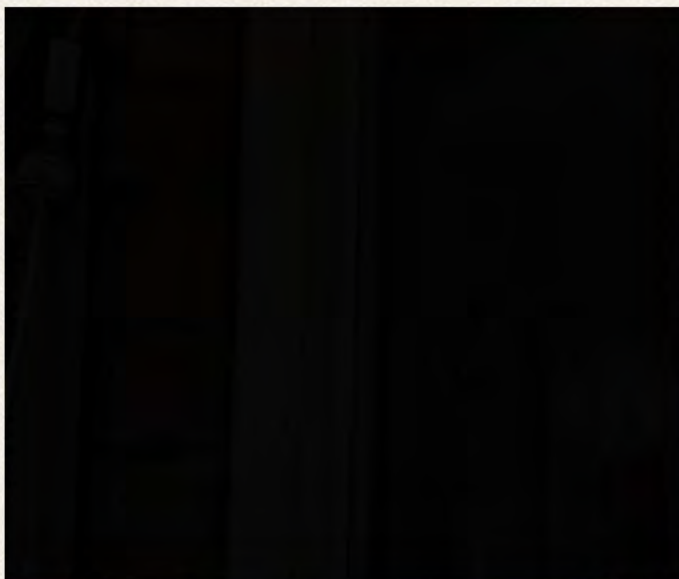
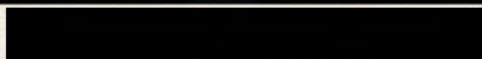


- [REDACTED]
- [REDACTED]
- [REDACTED]



- [REDACTED]
- [REDACTED]
- [REDACTED]

*Standard residential windows **CANNOT** safely replace window walls*

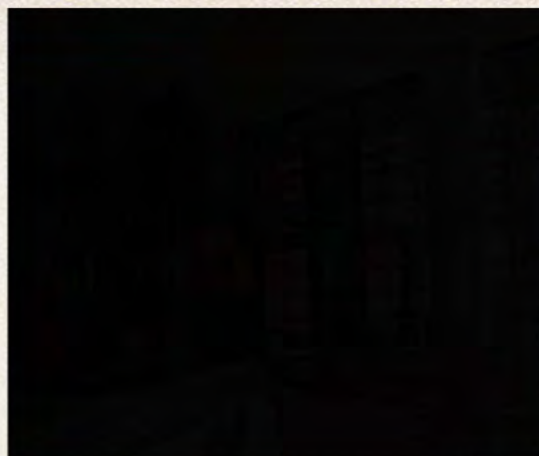


2. Functional Characteristics:

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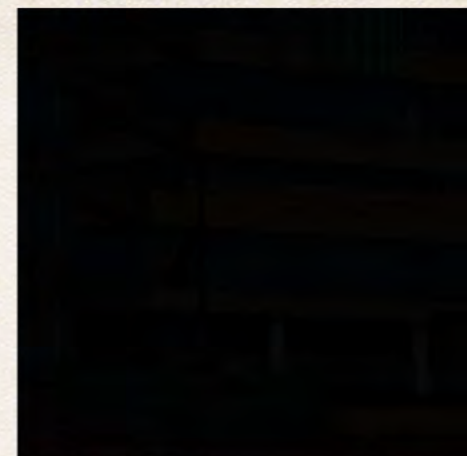
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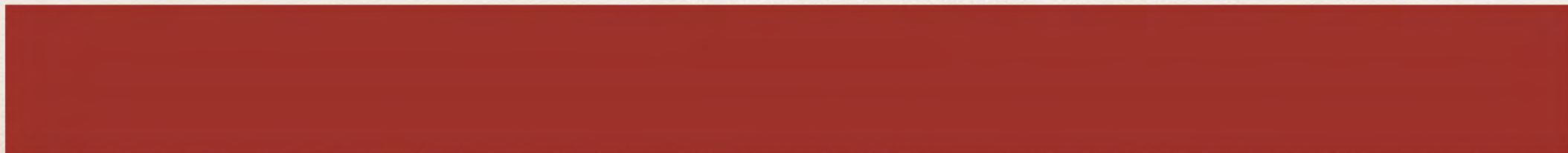
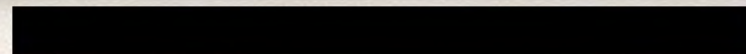
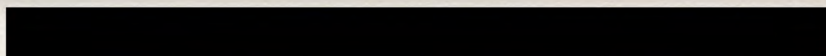
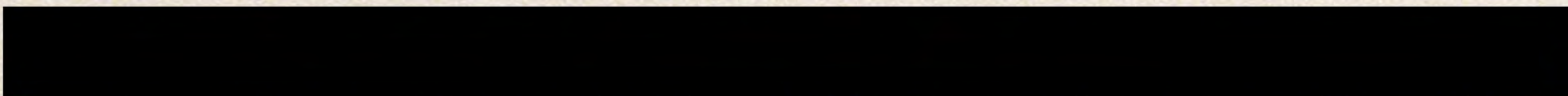


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- [Redacted list item]
- [Redacted list item]

2. Functional Characteristics:



3. Technical Standards:

AS 4284 Façade Testing vs AS 2047 Window Testing



AS 4284 — Facade Systems



AS 2047 — Windows & Doors



Key Distinction: **AS 4284** validates the system as a whole, critical for high-performance facades, while **AS 2047** only certifies individual components, making it inadequate for integrated building envelopes.

3. Technical Standards:

AS 4284 Façade Testing vs AS 2047 Window Testing



4. Commercial Attributes:

- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]

Different building role is different end use.



5. Production Logic:

[REDACTED]

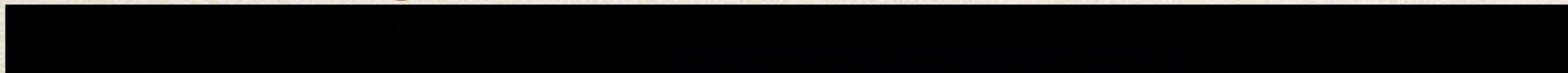
Window wall market

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- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Standard AWD market

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

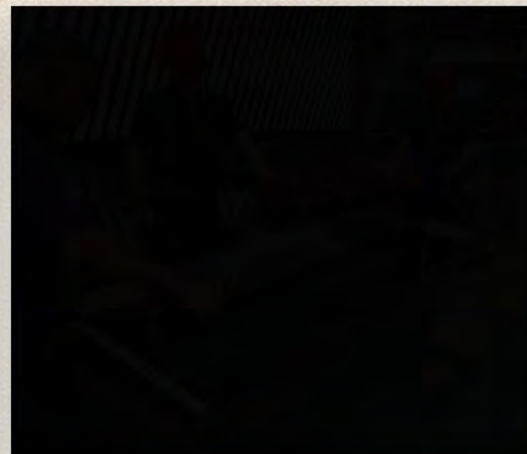
5. Production Logic:



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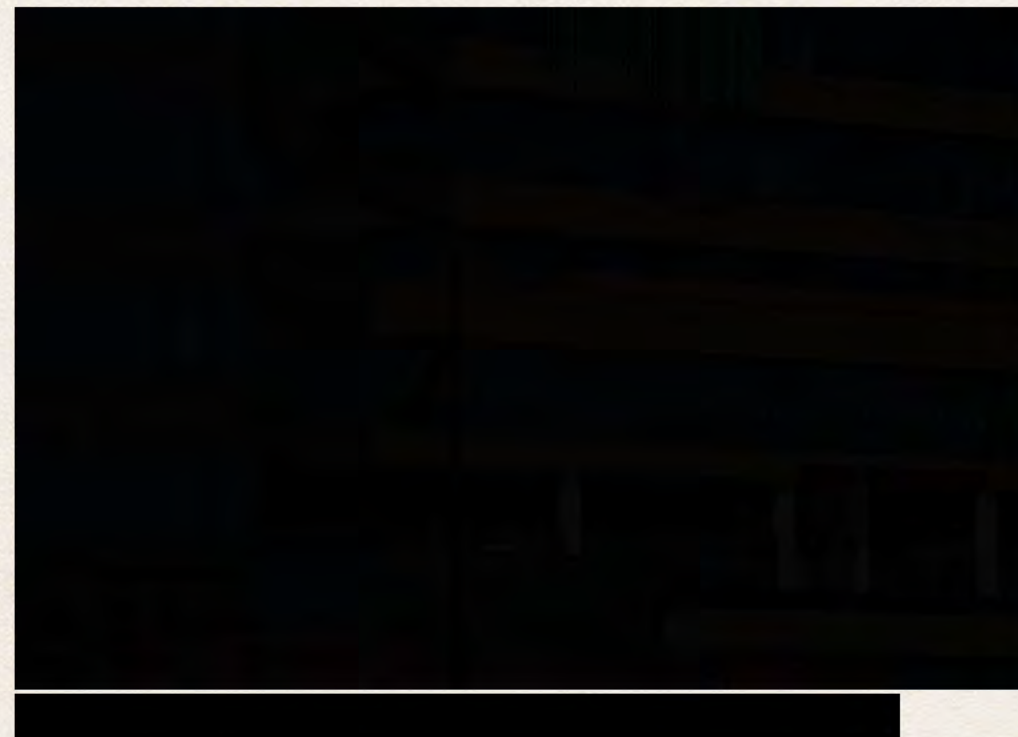


[Redacted caption text]

- [Redacted list item text]
- [Redacted list item text]
- [Redacted list item text]
- [Redacted list item text]

Window wall belongs to the excluded facade category

- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]



If curtain walls are expressly excluded, window walls should be excluded for the same functional and structural reasons.

ALTERNATIVE APPROACH

Statutory exemption under Section 8(7)(a)

Even if the Commission treats the goods as captured,
exemption remains warranted.

Alternative Approach: Statutory Exemption

Even if the Commission were to deem the products within scope, **exemption is warranted under Section 8(7)(a).**



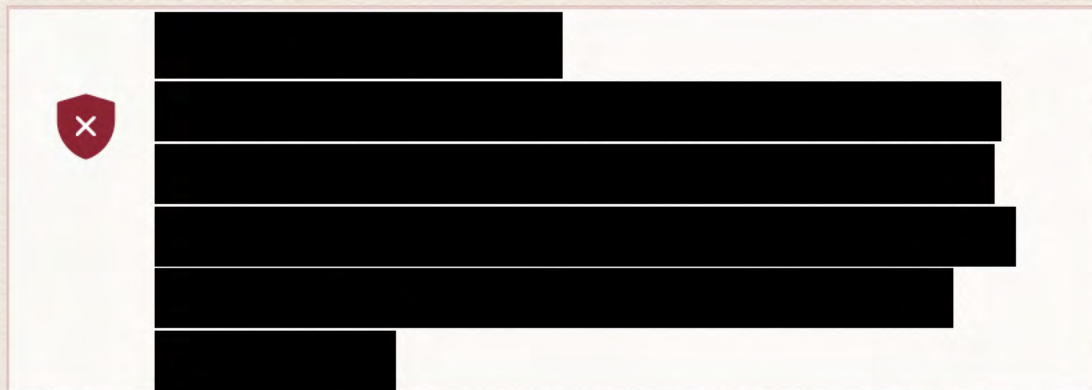
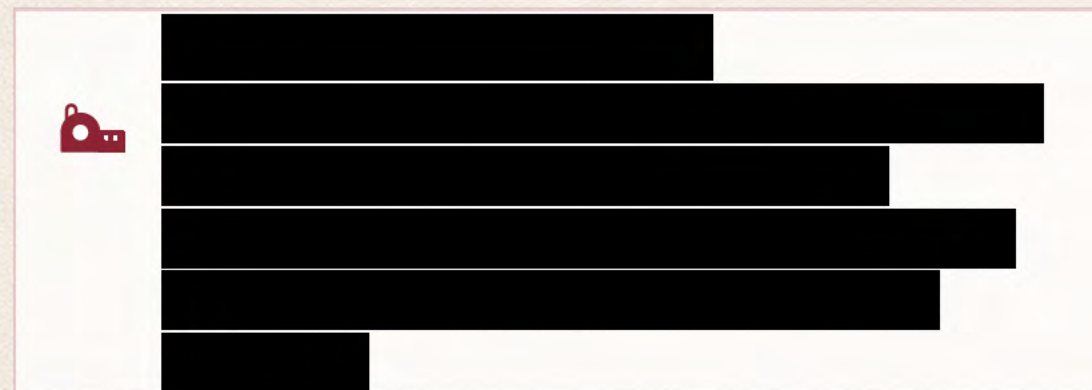
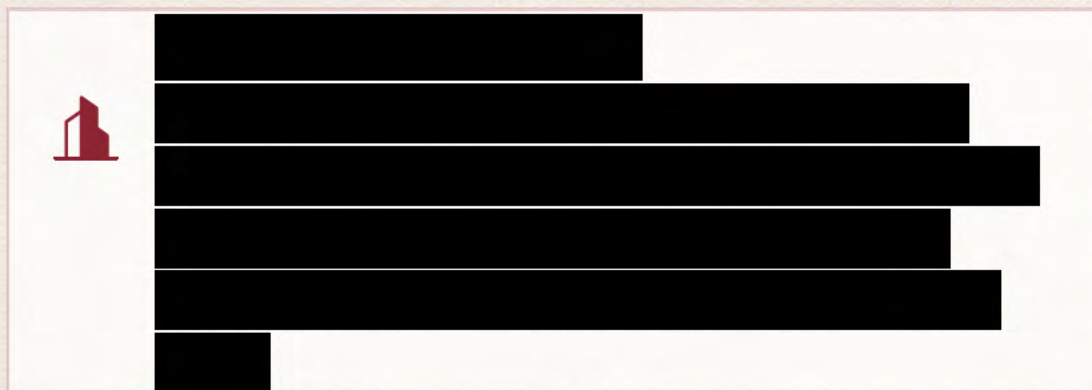
The relevant statutory inquiry is not abstract similarity; it hinges on whether **like or directly competitive goods** are offered in Australia to all **purchasers on equal terms under like conditions.**



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Scope exclusion is primary. Section 8(7)(a) exemption is the alternative approach.

Technical Non-Substitutability



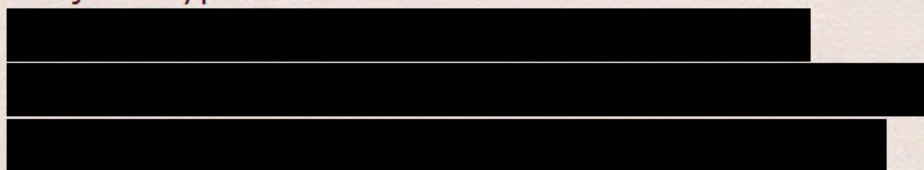
[Redacted text block]

Divergent End-Use and Buyer Demand

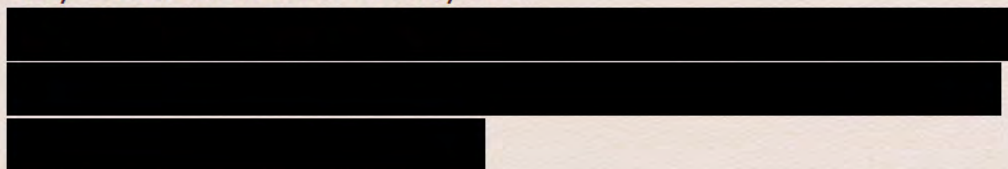
Window Wall Demand



Project Types



Key Stakeholders & Buyers



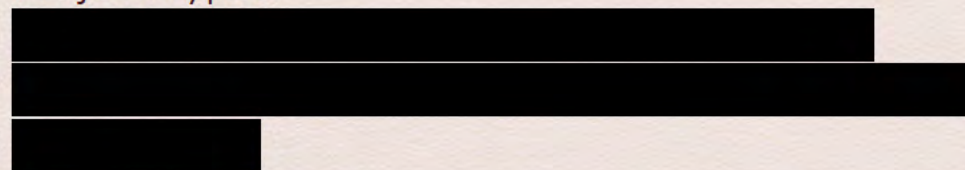
Critical Decision Drivers



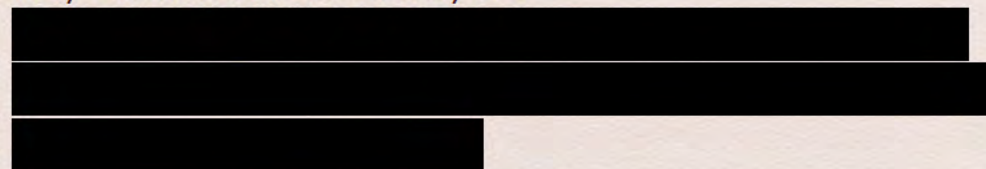
Residential AWD Demand



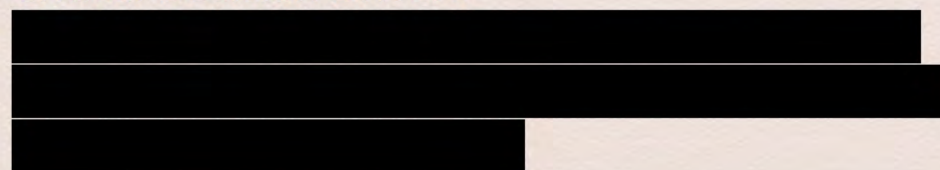
Project Types



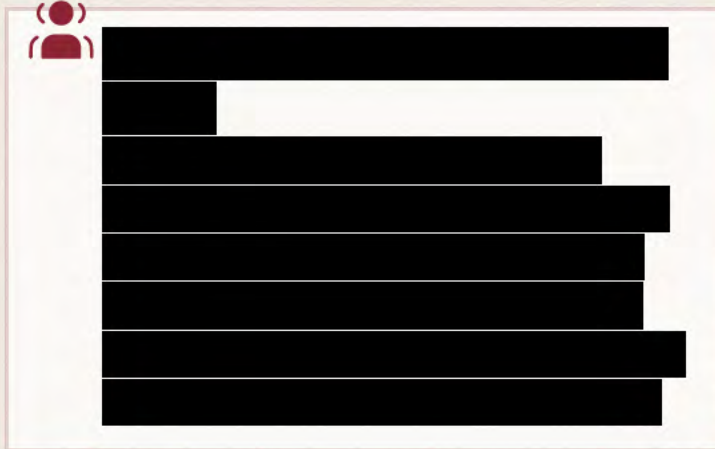
Key Stakeholders & Buyers



Critical Decision Drivers



Comparable Supply Is Not Offered on Equal Terms



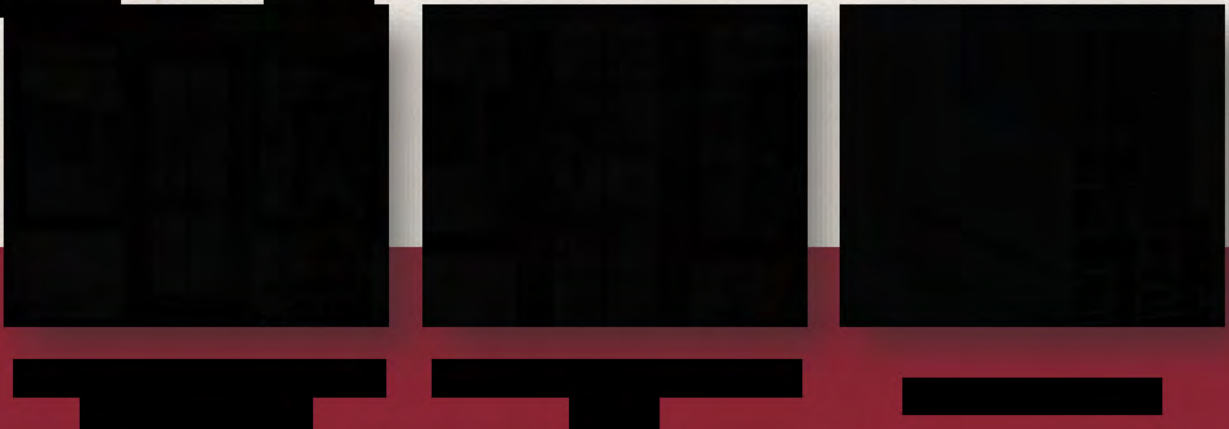
The statutory test focuses on **ACTUAL** comparable supply.

Integrated Punch Windows & Sliding Doors Also Qualify

Altop's Punch Windows

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Sliding Doors

- [REDACTED]
 - [REDACTED]
 - [REDACTED]
- 

Conclusion: Primary Scope Request

[REDACTED]

[REDACTED]

[REDACTED]

Primary request: exclude window wall facade systems at the scope stage.

Alternative Request: Section 8(7)(a) Exemption



GUC Scope & Statutory Exemption

If the Commission determines the goods fall within the GUC, Altop formally requests exemption pursuant to Section 8(7)(a) of the relevant regulations, as the systems are distinct in nature and application.



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Alternative request: grant statutory exemption if scope inclusion is found.

Requested Product Treatment Summary



Facade Envelope Systems

[Redacted text block for Facade Envelope Systems]



Integrated Punch Windows

[Redacted text block for Integrated Punch Windows]



System-Matching Sliding Doors

[Redacted text block for System-Matching Sliding Doors]

Exclude as facade/curtain wall products, or alternatively exempt under Section 8(7)(a) to ensure compliance with the intended design and performance criteria for high-rise building envelopes.

THANK YOU

Altop Facade Co., Limited | Hearing Presentation