19 August 2026

Anti-Dumping Commission
Investigations 1
GPO Box 1632
Melbourne VIC 3001

Email: investigations1@adcommission.gov.au

Public File

Investigation No. 691 concerning Aluminium Windows and Doors from China

Dear Director,

This submission is made jointly by the Australian Glass and Window Association (**AGWA**) and Ventora Group Pty Ltd (**Ventora**) (**the applicants**) in Investigation 691 (**INV 691**) concerning aluminium windows and doors (**AWDs**) exported to Australia from the People's Republic of China (**China**).

The applicants refer to the following submissions seeking exemption and/or consideration for separate assessment for window wall AWD:

Interested Party	**Exemption request details**
CGT Law[1]	Window wall façade systems and/or goods produced to AS 4284.
Altop Façade Co. Ltd[2]	Specialised window façade systems.
Broad Windows and Doors and Curtain Wall System Co., Ltd[3] (**Broad Windows**)	Aluminium windows and doors specifically designed, engineered, and supplied for installation in buildings classified as Class 2 or above under the National Construction Code (**NCC**), where the subject construction project has a gross floor area exceeding a threshold to be determined by the Commission. For the Commission's consideration, ALLBRIGHT proposes that such threshold be set at no less than 2,000 square metres.

For the administrative record, and to ensure the streamlined implementation of interim dumping and countervailing measures, the applicants confirm their opposition to the granting of exemptions/separate assessment over the goods as-described on the basis that the Australian industry does produce like or directly competitive goods for sale in Australia to all purchasers on equal terms under like conditions,

[1] EPR folio no's 409 and 424.
[2] EPR folio no. 430.
[3] EPR folio no. 446.

having regard to the custom and usage of trade, and/or that suitably equivalent goods are produced/manufactured in Australia.

The applicants set out below their grounds of opposition, being:

- that the Australian industry supplies like goods to the projects to which the requests are directed;
- that window wall systems fall within the goods under consideration (**GUC**);
- that, in any case, the exemption requests lack the specificity required for the grant of an exemption; and
- that, in any case, Broad Windows' proposed exemption is not administrable.

1. Window walls remain in-scope

The interested party exemption requests proceed on the basis that window wall systems (and, in Broad Windows' case, aluminium windows and doors supplied to Class 2 and above buildings more generally) are not, or should not be treated as, aluminium windows and doors within the GUC. Respectfully, this has already been comprehensively addressed and answered by the applicants on two prior occasions, and nothing in the present requests displaces the position established.

The applicants do not repeat that analysis in full, but reinforce and rely upon it as follows.

Australian Industry Injury Update, 13 March 2026

In this submission,[4] the applicants established that window wall is a type of AWD, not a distinct façade product, and falls squarely within the GUC. Relevantly, the applicants demonstrated that:

- Australian Standard AS 2047 (*Windows and external glazed doors in buildings*), at clause 1.1(e), expressly brings "window walls with one-piece framing elements" within its scope and, by the accompanying note, excludes only curtain wall; AS 2047 defines a window wall (clause 1.3.43) as "a series of multi-light windows". In other words, an arrangement of windows rather than a separate product. Curtain wall (clause 1.3.4) on the other hand is the single façade type excluded from the standard and, correspondingly, from the GUC; and

- the reliance placed by *Customs and Global Trade Law* in its submission of 28 December 2025 (EPR folio no. 409) on AS 4284 (*Testing of building facades*) is misconceived. AS 2047 and AS 4284 are complementary, not alternative: AS 2047 governs the window as a discrete product, whereas AS 4284 tests the performance of a complete façade assembly that may incorporate windows of any type. Under the NCC, AS 2047 compliance is mandated for all windows under the Deemed-to-Satisfy requirement, and where AS 4284 is used as a verification method under a Performance Solution it is valid only where the windows within the façade themselves comply with AS 2047. Testing to AS 4284 is therefore a contractual or project-specific requirement layered over, and not a substitute for, AS 2047. It does not transform an AWD into a non-AWD.

[4] EPR folio no. 426.

The applicants further established that window wall systems are produced by the Australian industry and are used across all building classes, including Class 1 dwellings, and so are neither confined to, nor definitional of, the Class 2–9 segment.

Response to the CCCMC, 26 June 2026

In this submission,[5] as responding to the submission of the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC),[6] the applicants reinforced and extended that position, and refuted the CCCMC's contention that window wall falls outside the GUC. Relevantly, the applicants established that:

- the GUC, as described in the section 269TC(4) initiation notice, covers all aluminium windows and doors meeting the descriptive specifications, subject only to the express exclusion of curtain wall; a window wall is not a curtain wall and therefore falls within the GUC. The contention that window wall must be specifically named to be included inverts the structure of the goods description, under which everything not excluded is included;

- the NCC's defined term for "window", as a glazed sash or device transmitting natural light from outside a building to the interior when in the closed position, is satisfied by a window wall, and AS 2047 defines a window wall as a series of windows, a definition drawn from the very standard on which the opposing parties otherwise rely;

- reference to AS 2047 is the correct interpretive guidance as to the ordinary product terms "aluminium windows and doors", not an impermissible incorporation of the standard into the GUC; and even if AS 2047 were treated as defining scope, it treats a window wall as a type of window and so supports the applicants' position;

- a window wall is a window, not a wall: it is a wall made of windows, vertically discontinuous and interrupted at each floor slab. Installation methodology, anchoring, weatherproofing and integration into a façade assembly concern how a window is incorporated into a building, not what the product is; ancillary elements such as slab-edge covers and cover plates are physically and functionally distinct from the glazed aluminium units;

- the variation in physical characteristics relied upon (profile weight, wall thickness, glazing typology and the like) reflects the spectrum of building typologies across which aluminium windows are deployed (a cyclonically-rated window and a standard suburban window are both, categorically, aluminium windows) and is a difference of degree and application, not of product-kind; and

- the existing MCC structure readily accommodates window wall, and the CCCMC's reliance on the unitised wall module references in Section C of the application is misconceived, those references being deployed in the subsidy context and not as a delimitation of scope.

[5] EPR folio no. 440.
[6] EPR folio no. 436.

Current arguments raise noting new

The interested party exemption requests provide no further arguments that have not been addressed by the applicants. For the reasons established in the applicants' submissions of 13 March 2026 and 26 June 2026, and reinforced above, window wall systems, and aluminium windows and doors supplied to Class 2 and above buildings, fall within the GUC.

The applicants submit that the scope of the GUC is settled and should not be revisited by the Commission.

2. Exemption requests lack detail

An exemption under subsection 8(7) (dumping) and/or 10(8) (countervailing) of the Customs Tariff (Anti-Dumping) Act 1975 operate as an exception to duties that would otherwise apply to goods the subject of a Notice. To be capable of being granted and given effect, an exemption must describe the exempt goods with sufficient precision that they can be identified, by reference to their own characteristics, at the time of importation. A request that does not define the goods with that precision provides no workable basis on which an exemption request can be assessed by the Australian industry, and whether it could be recommended or administered.

The applicants submit that all interested party exemption requests lack the requisite level of detail:[7]

- CGT Law seeks exemption for "window wall façade systems and/or goods produced to AS 4284". As established above, "window wall" is itself a type of window. "Goods produced to AS 4284" describes a testing status rather than a product: AS 4284 is a project-level method for testing building façades, capable of application to a range of building elements, and an aluminium window may itself be tested to AS 4284. As drafted, CGT's Law's would exempt in-scope goods according to an unverifiable attribute;

- Altop seeks exemption for "specialised window façade systems" and "integrated punch windows". "Specialised" and "integrated" are self-referential and supply no ascertainable boundary. A punch window is, on any ordinary meaning, an aluminium window; its incorporation into a façade does not alter its character; and

- Broad Windows seeks exemption for goods "specifically designed, engineered and supplied for" installation in certain buildings. That description relies on the end-use of the goods rather than any characteristic of the goods themselves (addressed further below).

It is the onus of the requesting party to establish entitlement to an exemption. Where the exempt goods cannot be distinguished from in-scope goods on the face of the goods at importation, no exemption should be granted.

[7] This does not detract from the applicant's position at #1 that, in any case, window wall exemptions should not be granted.

3. The Broad Windows description is unworkable

The Broad Windows exemption wording relies on two facts vis-à-vis the construction project into which the goods are ultimately installed: (1) that the building is classified as Class 2 or above under the NCC, and (2) that the project has a gross floor area of not less than 2,000 square metres. The reading of the exemption wording is that both must be satisfied. However, neither is a characteristic of the imported goods, and neither can be verified by the Australian Border Force (**ABF**) at the time of importation.

The ABF's task, inter alia, is to assesses and clears goods on importation. It is not in a position to verify, for each consignment, the NCC classification of a building, or the gross floor area of a commercial construction project, that may be incomplete or not yet commenced when the goods enter Australia. The documents Broad Windows relies on (building permits, development approvals, architectural plans and gross floor area records) are project documents held by builders and developers, generated outside the import transaction, and are neither ordinarily available to the ABF at the border nor able to be reliably tested by it.

The proposal is also inherently open to circumvention. The same aluminium window or door is physically identical whether installed in a Class 1 dwelling or a Class 2 or above building, and whether the relevant project is above or below the nominated threshold. An importer could nominate a qualifying project to obtain the exemption and apply the goods elsewhere, defeating the measures without any means of detection at the border. Policing the exemption as-written would require the goods to be traced to their point of installation, which lies wholly outside the border clearance process.

As an aside but nonetheless relevant point, the 2,000 square metre threshold is arbitrary. Goods supplied to a project of 1,999 square metres and a project of 2,001 square metres are indistinguishable. The applicants submit that an exemption that cannot be administered at the border undermines the integrity and effectiveness of the measures and should not be recommended.

4. The Australian industry supplies AWD to Class 2 and above projects of not less than 2,000 square metres

Broad Windows' request is premised on the incorrect stipulation that the Australian industry does not, or cannot, supply AWDs to Class 2 and above projects with a gross floor area of not less than 2,000 square metres, such that like or directly competitive goods are not offered for sale in Australia on equal terms.

To emphasise again for the administrative record (and as the administrative record indeed reflects, given the multitude of industry representations made during the course of this inquiry to-date concerning sovereign capability) the Australian industry offers and supplies like goods to projects of that scale in the ordinary course of trade, and competes for them directly.

In the applicants' submission of 26 June 2026, [***confidential text deleted:*** *industry injury example*]. That example directly contradicts the position of Broad Windows – the Australian industry does offer AWD goods to this segment.

This also calls into question the reliability of the confidential nine-project list on which Broad Windows relies in its submission, which the applicants have not been able to test.

For and on behalf of the Australian Industry Applicants