29 September 2026

The Director – Investigations
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601

Investigation No. 691 – Aluminium windows and doors exported from the People's Republic of China

Dear Director,

This submission is made on behalf of Broad Windows and Doors and Curtain Wall System Co., Ltd (Broad), an exporter of the goods under consideration. It concerns the identification of the Australian industry producing like goods, and the questions of standing and representativeness that depend on it.

The application was lodged jointly by Ventora Group Pty Ltd (Ventora) and the Australian Glass and Window Association (AGWA). The goods are described in Anti-Dumping Notice No. 2025/115 as "Aluminium windows and doors, whether fully or partially assembled, including their frames, panels, and sashes, with or without glass, whether or not thermally broken, whether or not including hardware". That description spans a wide range of local operations, from the fully integrated fabrication of a complete window or door to the assembly of imported components. Which Australian operations amount to the production of like goods, and which entities therefore comprise the Australian industry, is the foundation on which standing, the industry definition and the injury assessment all rest.

Broad submits that the Commission has not yet laid out its assessment of these issues on the public record. The composition of the Australian industry remains unclear, no assessment of substantial process of manufacture has been disclosed for the supporting AGWA members, and the production figures needed to test standing and representativeness have not been established. Broad raises these matters now, ahead of the Statement of Essential Facts (SEF), which is due on or before 14 October 2026. Each is a step the Commission can still take before the SEF, and Broad requests that it be taken.

Identification of the Australian industry and its members remains unresolved

The Australian industry is not a preliminary formality. Under s.269T(4) of the Customs Act 1901 (the Act), where there are persons who produce like goods in Australia, "there is an Australian industry in respect of those like goods" and "the industry consists of that person or those persons". Inclusion in the Australian industry is a question of fact about production. It does not follow from membership of an industry association, from support for an application, or from participation in the market as a supplier of the goods.

AGWA is an association, not a producer. The Act names associations only as interested parties. An association produces no like goods of its own. It follows that, for the purpose of standing, AGWA contributes nothing to the statutory thresholds. An application must be "supported by a sufficient part of the Australian industry", and it is taken to be so supported only where the Commissioner is satisfied that "persons (including the applicant) who produce or manufacture like goods in Australia and who support the application" account for more than 50 per cent of the production of those expressing a view and not less than 25 per cent of total Australian production. What counts is the production of the individual entities who both produce like goods and expressly support the application, not the fact of the association's name on the form.

The Manual states the Commission's own practice. The Australian industry producing like goods "must be identified before initiation of an investigation", and that decision "is based on facts and not mere conjecture". That reflects Australia's international obligations. The Anti-Dumping Agreement requires an application to identify the industry "by a list of all known domestic producers of the like product (or associations of domestic producers of the like product) and, to the extent possible, a description of the volume and value of domestic production of the like product accounted for by such producers", and permits initiation only where the authorities have determined, "on the basis of an examination of the degree of support for, or opposition to, the application expressed by domestic producers of the like product", that the application is made by or on behalf of the domestic industry. On the face of that provision the applicant's obligation runs to all known domestic producers, not only to those it represents or to those that support it, and extends to the volume and value of the production those producers account for.

Article 5.2 specifies what an application must contain. It is Article 5.3 that governs what the authority must then do with it: "The authorities shall examine the accuracy and adequacy of the evidence provided in the application to determine whether there is sufficient evidence to justify the initiation of an investigation." That obligation is substantive. The panel in *Mexico - Steel Pipes and Tubes* declined to read the provision as imposing "no substantive obligation upon an investigating authority in respect of its assessment of the sufficiency of the evidence before it".[1] The same material now carries the definition of the Australian industry into the SEF.

The Consideration Report sets out the assessment of support in a single passage. It records that "Ventora cannot satisfy standing individually and has provided supporting statements of other Australian manufacturers/producers that it considered could manufacture like goods and their production volumes, which is contained in confidential attachments", and that "[t]he commission has reviewed the information provided".

Broad makes the following observations about this preliminary assessment. The cohort of supporting producers was identified by the applicant, on the applicant's own view of who could manufacture like goods. The production volumes against which both conditions of s.269TB(6) were tested are not on the public record. And the step the Commission records

[1] Panel Report, Mexico - Steel Pipes and Tubes from Guatemala, WT/DS331/R, para 7.20.

having taken was to review what it was given. Nothing in the Consideration Report records the Commission approaching any Australian producer outside the applicants.

The public record does not yet allow that examination to be tested. In answer to a standing challenge from the China Chamber of Commerce, which submitted that it was not clear the application was supported by a sufficient part of the Australian industry,[2] the Commission published a file note listing 21 supporting industry members and recording that their production, together with Ventora's, "represents 55% of the total estimated production volume of like goods".[3] The supporting figures sit in confidential attachments to the application, and the 55 per cent appears to be expressed against an estimate of total production. The file note does not identify which of AGWA's members produce like goods in Australia, what each produce, or how support was gathered.

Key features of the industry make that gap significant. Many of the named supporters fabricate windows and doors from aluminium extrusions and glass, and some are understood also to import windows and doors, or the components from which they are made, to supplement their own ranges. An entity that is both a local fabricator and an importer sits at the centre of the questions in this submission, which is whether its Australian operations amount to the production of like goods, and, if they do, whether it in fact supports measures against the very imports on which it also relies. Broad's understanding is that AGWA did not contact its members, inform them of the application, or seek their comment on it for the purpose of the standing assessment. Broad asks the Commission to confirm the position, and to place beyond doubt which members were canvassed and whether each expressed support, opposition, or no view.

It follows that the Australian industry is not the same as the group that supported the application. Support must be expressed before it can be counted. As the Appellate Body put it in *US - Offset Act*, Articles 5.4 and 11.4 "require only that authorities 'determine' that support has been 'expressed' by a sufficient number of domestic producers", so that "it is the 'quantity', rather than the 'quality', of support that is the issue".[4] Broad makes no complaint about the motives of any supporter. The point is more limited. A producer that was never asked has expressed nothing, so it falls outside the group "that has expressed either support for, or opposition to, the application" while remaining within the total production against which the second threshold is measured. Producers that did not support the application remain members of the Australian industry, because nothing in Article 4.1 permits the industry to be interpreted "from the outset, as not including certain categories of producers of the like product, other than those set out in that provision".[5]

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[2] China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters, submissions at EPR nos. 423 and 436.

[3] ADC File note, EPR 691 document no. 450.

[4] Appellate Body Report, United States - Continued Dumping and Subsidy Offset Act of 2000, WT/DS217/AB/R, WT/DS234/AB/R, para 283.

[5] Panel Report, European Communities - Farmed Salmon from Norway, WT/DS337/R, para 7.112.

That is not a technical objection. In *EC - Salmon* the panel found "no support for the exclusion of these producers, as a group, from the domestic industry", the producers in question including those that had expressed no view.[6] The consequence the panel drew is why the point matters now. It concluded that the authority's approach "resulted in an investigation concerning a domestic industry that did not comport with the definition set forth in Article 4.1", that "[a]s a consequence" the determination of support under Article 5.4 "was based on information relating to a wrongly-defined industry, and is therefore not consistent with the requirements of that Article", and that the analyses of injury and causation "were based on information relating to a wrongly-defined industry, and are therefore necessarily not consistent" with the Agreement.[7] The definition of the industry is not a preliminary step that can be corrected afterwards. Everything rests on it.

Broad's understanding is that a substantial number of AGWA members that manufacture like goods in Australia were not contacted about the application, and so were never asked to indicate either support for it or opposition to it. AGWA's published membership includes a large number of window and door manufacturers. Against that background it is understandable that interested parties have begun to question the decision not to seek comment from the membership more broadly when Appendix A1 to the application form was completed. Motive is not the issue. What matters is whether the producers whose views Article 5.4 and s.269TB(6) make decisive were ever placed in a position to express a view.

Against that background the figure of 55 per cent raises more questions than it answers. The file note records that the production of the 21 listed members, together with Ventora, "represents 55% of the total estimated production volume of like goods".[8] It does not say what that total comprises, how it was arrived at, or whether the Commission tested it. The Consideration Report describes an estimate of market size built by the applicants from Ventora's sales, the volumes of supporting members, "estimated sales volumes of the remaining industry members not commenting on the application" and third party import data, which the Commission considered reasonable "given the limited information available to it". That is an estimate of market size. The 55 per cent is a proportion of production. The public record does not disclose how the total production figure was established, or whether the two exercises are the same.

The following questions are genuine, and each one relates to a condition the Commissioner must be satisfied about. Does the numerator include the production of supporting entities that claimed confidentiality and were therefore not named?[9] Has each of the 21 been assessed as a producer of like goods in Australia, and on what basis? Does the denominator extend to producers that are not members of AGWA? On what basis were the volumes of producers that did not comment estimated, and was that estimate tested?

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[6] Panel Report, European Communities - Farmed Salmon from Norway, WT/DS337/R, para 7.122.
[7] Panel Report, European Communities - Farmed Salmon from Norway, WT/DS337/R, para 7.124.
[8] ADC File note, EPR 691 document no. 450.
[9] ADC File note, EPR 691 document no. 450, footnote 3.

Broad has tested how much turns on those answers. If the estimate captured 80 per cent of actual Australian production, the proportion falls to 44 per cent. If it captured about two thirds, the proportion falls to 36 per cent, which the Appellate Body has held to be low even in the context of a fragmented industry.[10] If it captured a little under half, the proportion falls to 25 per cent, the level the Act requires the Commissioner to be satisfied of. Broad does not assert that any of those figures is the correct one. The point is that none of them can be excluded on the present record.

There is method available to the Commission. The Agreement contemplates that in "the case of fragmented industries involving an exceptionally large number of producers, authorities may determine support and opposition by using statistically valid sampling techniques".[11] Other authorities have gone further and invited producers to identify themselves. In *EC – Fasteners,* the European Commission invited producers to make themselves known within a deadline, and the Appellate Body held that course reasonable, observing that "an investigating authority must be allowed to set various deadlines to ensure an orderly conduct of the investigation".[12] In *China - Autos* the panel found nothing objectionable in a registration requirement, seeing "nothing in the neutral request for information" that would deter producers from coming forward.[13] Broad does not submit that either course was required. It submits that a course of that kind was available, that it remains available, and that it is the ordinary means by which an authority establishes who the domestic producers are rather than accepting a list by an association that does not inform its members or invite its members to express an opinion.

Substantial process of manufacture

Whether an Australian operation produces like goods is governed by s.269T(2) and (3). Goods "other than unmanufactured raw products, are not to be taken to have been produced in Australia unless the goods were wholly or partly manufactured in Australia", and goods "shall not be taken to have been partly manufactured in Australia unless at least one substantial process in the manufacture of the goods was carried out in Australia". Where an operation finishes or assembles inputs made by others, s.269T(3) is the provision that decides whether it is a producer of the like goods at all.

The Commission's own understanding of the test appears in the Manual. "The concept of 'substantial process' is not defined in the legislation but before it can be assessed, the process or processes undertaken in Australia must be identified. To be substantial, that process must add some essential or vital quality or character to the finished product of like goods. The conversion of intermediate goods into final goods by virtue of a simple process such as dividing, sorting, simple assembly, packaging or labelling may not be regarded as

[10] Appellate Body Report, European Communities - Certain Iron or Steel Fasteners from China (Article 21.5 - China), WT/DS397/AB/RW, para 5.313.
[11] Anti-Dumping Agreement, Art 5.4, footnote 13.
[12] Appellate Body Report, European Communities - Certain Iron or Steel Fasteners from China, WT/DS397/AB/R, para 460.
[13] Panel Report, China - Certain Automobiles from the United States, WT/DS440/R, paras 7.214 and 7.216.

substantial."[14] The first step, identifying the processes each entity performs, is mandatory, and it precedes any conclusion about substantiality.

The task is entity-specific and is measured against the whole chain of manufacture. In Report No. 75, the Review Panel held that "it is the product that is being produced which determines whether a particular entity is part of the industry producing like goods".[15] In Report No. 169 the Panel construed s.269T(3) directly, holding that a substantial process "is a process that is regarded as being 'considerable in amount, extent, [or] importance ...' when considered in light of all of the processes that are undertaken in the manufacture of the goods", the question being whether the process "is ... of relative importance when considered against the whole of the process of manufacture".[16]

The Commission's fullest application of the test remains the brandy investigation. Measuring the local step against the whole chain, "[g]iven the transformation of grapes to grape juice to distilled spirit to matured brandy", Customs took the view that "this final blending stage could not be categorised as a substantial process of manufacture".[17] That the local operation yielded a changed and commercially distinct product did not alter the conclusion. Customs accepted that dilution from approximately 60 per cent to 37 per cent alcohol produced "a different product", but "[w]hat Customs does not accept is that a substantial process of manufacture has occurred, in terms of the legislation".[18]

Applied to this investigation, the range of local operations makes the assessment essential rather than optional. At one end is the producer that designs and purchases its own extrusions, purchases the glass it requires, and fabricates a complete window or door. At the other is the operation that imports semi-finished windows or doors and combines them with locally produced sashes or frames, or that assembles imported components. Between those operations, the answer to the statutory question will differ from entity to entity, and it will turn on which processes each performs in Australia and whether any of them is substantial when measured against the whole chain. Nothing on the public record discloses that this assessment has been undertaken for the supporting members. Their production operations are not described, and the basis on which each was treated as a producer of like goods is not stated.

The Anti-Dumping Agreement contemplates the same entity-specific inquiry. The panel in *EC - Salmon* accepted that "there may be circumstances in which an investigating authority might conclude that certain enterprises whose output is part of the like product should not be considered 'producers', as their level of activity is so low as to suggest that they do not

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[14] Anti-Dumping Commission, Dumping and Subsidy Manual (December 2021), p 8.
[15] Anti-Dumping Review Panel, Report No. 75, Alloy Round Bar from Korea (2018), paragraph 22.
[16] Anti-Dumping Review Panel, Report No. 169, Steel Pallet Racking from China and Malaysia (2024), paragraph 172.
[17] Trade Measures Report No. 117, Certain Brandy from France, p 23.
[18] Trade Measures Report No. 117, Certain Brandy from France, p 24.

actually bring the like product into existence".[19] What Broad seeks is that assessment, made entity by entity on identified facts. It does not seek the exclusion of any category of producer.

The public statements of entities named in the file note show why that assessment cannot be assumed. Architectural Window Systems, which is not among the supporting members, describes itself as designing, testing, finishing and supplying aluminium window and door systems "to more than 200 licensed manufacturers throughout Australia".[20] Several of the named supporters present themselves in corresponding terms. One describes itself as a proud supplier of the Vantage and Elevate ranges while also stating that it custom makes windows and doors.[21] Another states that it operates "[a]s a licensee of A&L Windows Pty Ltd",[22] a brand which the applicant's own website identifies as one of its own,[23] and publishes an ABN registered to the trustee of a unit trust bearing the A & L name.[24] A third is described by a building group as "integrated into" that group,[25] while describing itself as "supplying" glazing products.[26] A fourth describes itself as a manufacturer of "glass, aluminium extrusions, windows, doors, and facades".[27] Broad does not contend that any of these entities is, or is not, a producer of like goods, and none of this material is a substitute for verification. What it shows is that the question is unsettled, that the answer differs from entity to entity, and that the material was publicly available before the industry was defined.

Total domestic production and major proportion

The identification of the industry then controls two further questions that the record leaves unanswered. Whether the application is supported by a sufficient part of the Australian industry, and whether the industry on which injury is assessed is properly defined. Both require the Commission to know production volumes.

The domestic standing test is itself quantitative. Section 269TB(6) is satisfied only where the supporting producers account for more than 50 per cent of the production of those expressing a view and not less than 25 per cent of total Australian production, and the Manual records that the determination is "usually based on volume data". A conclusion expressed as 55 per cent of an estimate of total production does not show the Commission's satisfaction on either condition, because the record does not disclose the total production figure, the production of the supporting members, or the production of any producer that opposed or did not respond.

Australia's obligation under the Anti-Dumping Agreement confirms the point. Article 4.1 defines the "domestic industry" as "the domestic producers as a whole of the like products

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[19] Panel Report, European Communities - Farmed Salmon from Norway, WT/DS337/R, para 7.120.
[20] Architectural Window Systems, Our Company, https://awsaustralia.com.au.
[21] Evolution Window Systems, https://evolutionwindows.com.au.
[22] Aliview Group, https://www.aliviewgroup.com.au.
[23] VENTORA, https://ventora.com.au.
[24] Australian Business Register, ABN Lookup, ABN 95 563 397 474.
[25] Scott Park Group, Companies, https://scottparkgroup.com.au.
[26] Glass Co Metro, https://glasscometro.com.au.
[27] G.James Glass & Aluminium, https://gjames.com

or ... those of them whose collective output of the products constitutes a major proportion of the total domestic production of those products", subject to the exception that "when producers are related to the exporters or importers or are themselves importers of the allegedly dumped product, the term 'domestic industry' may be interpreted as referring to the rest of the producers". Section 269T(4) enacts the first of those definitions that ‘the industry consists of the producers of like goods in Australia’. Whichever way the industry is expressed, the total universe of production must be known. As the panel put it in *China - Broiler Products*, a claim to represent a major proportion cannot be accepted because "without an understanding of the total universe of production an investigating authority will not be able to verify such an assertion", and the authority "must establish total domestic production ... by actively seeking out pertinent information and not remaining passive in the face of possible shortcomings in the evidence submitted".[28]

There is a further reason to settle the composition of the industry before any share is struck. In *EC - Fasteners* the Appellate Body held that "by defining the domestic industry on the basis of willingness to be included in the sample, the Commission's approach imposed a self-selection process among the domestic producers that introduced a material risk of distortion", observing that the domestic industry "is a universe of producers that is by definition wider than the sample" and should be "defined first".[29] An industry whose membership is drawn from the producers nominated by the applicant carries the same risk.

The panel in *China - Broiler Products* accepted that there is no hierarchy between the two definitions in Article 4.1, and that authorities "are not required by the agreements to first attempt to identify every domestic producer before they can define the domestic industry as those producers whose output constitutes a major proportion of total domestic production".[30] The Commission need not find every producer. It must still establish the total against which the proportion is measured.

The Appellate Body has explained what follows where the proportion cannot be shown to be high. There is "an inverse relationship between, on the one hand, the proportion of producers represented in the domestic industry and, on the other hand, the absence of a risk of material distortion in the definition of the domestic industry and in the assessment of injury", so that "a major proportion" carries "both quantitative and qualitative connotations".[31] Where the proportion "is not sufficiently high that it can be considered as substantially reflecting the totality of the domestic production, then the qualitative element becomes crucial".[32] In such cases the Commission "bears the same obligation to ensure that the process of defining the domestic industry does not give rise to a material risk of distortion", and "would need to

[28] Panel Report, China - Broiler Products from the United States, WT/DS427/R, para 7.421.
[29] Appellate Body Report, European Communities - Certain Iron or Steel Fasteners from China, WT/DS397/AB/R, para 427.
[30] Panel Report, China - Broiler Products from the United States, WT/DS427/R, para 7.416.
[31] Appellate Body Report, European Communities - Certain Iron or Steel Fasteners from China (Article 21.5 - China), WT/DS397/AB/RW, para 5.302.
[32] Appellate Body Report, European Communities - Certain Iron or Steel Fasteners from China (Article 21.5 - China), WT/DS397/AB/RW, para 5.303.

make a greater effort to ensure that the selected domestic producers are representative of the total domestic production by ascertaining that the process of the domestic industry definition, and ultimately the injury determination, does not give rise to a material risk of distortion".[33] Measured against that standard, the step the Consideration Report records is that the Commission reviewed the information provided to it.[34]

Industry fragmentation cannot explain the lack of proper inquiry. Defining the domestic industry by reference to producers' willingness to participate "cannot be justified by the difficulty of obtaining information from a greater number of producers", and even where a lower proportion is relied on "an investigating authority should not seek to rely exclusively or predominantly on those domestic producers that consider themselves to be injured".[35]

Nor must Broad show that the definition produced a distorted result. A process "may be inconsistent with Articles 4.1 and 3.1 not only when distortion actually occurs, but also when the process in question risks or is susceptible to lead to distortion", and where a low proportion is selected through such a process "it cannot constitute a 'major proportion' within the meaning of Article 4.1, regardless of whether the actual result of the process is distorted or not".[36]

The 25 per cent standing benchmark cannot stand in for that exercise. As the Appellate Body held in *EC - Fasteners*, "Articles 4.1 and 5.4 concern two different aspects of an anti-dumping investigation", and "the 25 per cent benchmark under Article 5.4 does not address the question of how" the domestic industry is defined.[37] A "major proportion" means "a relatively high proportion of the total domestic production",[38] and while it need not be a majority, the word "major" is "important, serious, or significant".[39] None of that can be tested on a public record that does not establish the denominator.

The composition of the industry reinforces the point in this case. Where the like goods are made by operations ranging from integrated fabrication to the assembly of imported components, total production cannot be compiled without attention to double counting. An authority computing total domestic production must "either (a) describe whether, and if so how, it avoided double counting ... or, in the alternative (b) provide a reasoned and adequate explanation as to why it was unnecessary".[40] If a supporting member's aluminium extrusions

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33 Appellate Body Report, European Communities - Certain Iron or Steel Fasteners from China (Article 21.5 - China), WT/DS397/AB/RW, para 5.303.

34 Consideration Report No. 691, compliance assessment table, entry for s 269TB(4)(e) and s 269TB(6).

35 Appellate Body Report, European Communities - Certain Iron or Steel Fasteners from China (Article 21.5 - China), WT/DS397/AB/RW, para 5.319.

36 Appellate Body Report, European Communities - Certain Iron or Steel Fasteners from China (Article 21.5 - China), WT/DS397/AB/RW, para 5.321.

37 Appellate Body Report, European Communities - Certain Iron or Steel Fasteners from China, WT/DS397/AB/R, para 418.

38 Appellate Body Report, European Communities - Certain Iron or Steel Fasteners from China, WT/DS397/AB/R, para 412.

39 Panel Report, Argentina - Poultry from Brazil, WT/DS241/R, para 7.341.

40 Panel Report, China - Stainless Steel Products from Japan, WT/DS601/R, para 7.37.

or glass are themselves counted, or if a fabricator's output is counted alongside the components it purchased from another named member, the total will be overstated and the shares distorted.

That risk is not theoretical in this case, given that the goods are described as aluminium windows and doors "whether fully or partially assembled, including their frames, panels, and sashes, with or without glass". A partially assembled window, and a frame, panel or sash on its own, therefore fall within the goods. Where a producer of window and door systems supplies frames or sashes to a licensed manufacturer which assembles them into finished windows, the output of each may be within the goods, and counting both would count the same product twice. That is the second of the two scenarios identified in *China - Stainless Steel*.[41] Neither the Consideration Report nor the file note describes how double counting was avoided, or explains why it was unnecessary to address it.

EC - Salmon makes the same point about the total. Having concluded that producers had been wrongly excluded, the panel observed that "it is clear that the EC's assessment of whether the producers it did include accounted for a 'major proportion' of domestic production of the like product is based on incorrect information concerning the volume of total domestic production of the domestic like product".[42] The panel went no further, because to do so would have required it to make its own assessment. The Commission is not in that position. It can establish the total, and it said at initiation that it would reassess the market size on verified data obtained from interested parties.[43]

Recommendation

The identification of the Australian industry, the assessment of substantial process of manufacture, and the establishment of total domestic production are not separate issues. They are three parts of one task that the public record shows has not been completed, and each can be completed before the SEF. The Commission is respectfully requested to:

- identify, entity by entity, which Australian operations produce like goods and therefore comprise the Australian industry, and disclose the basis on which each was so treated;
- for each claimed member, identify the processes it carries out in Australia and assess, on those identified facts, whether at least one is a substantial process in the manufacture of the goods within s.269T(3), measured against the whole chain of manufacture;
- establish the total domestic production of like goods, the production of the supporting producers, and the production of any producer opposing or not responding, from established figures rather than an estimate, and address double

[41] Panel Report, China - Stainless Steel Products from Japan, WT/DS601/R, paras 7.36 and 7.37.
[42] Panel Report, European Communities - Farmed Salmon from Norway, WT/DS337/R, para 7.123.
[43] Consideration Report No. 691, section 2.5.1.

counting where operations span integrated production and the assembly of purchased or imported components;

- confirm whether, and how, AGWA canvassed its members on the application, and record for each whether it expressed support, opposition or no view;
- address expressly the position of any supporting producer that is related to an exporter or importer, or is itself an importer, consistent with s.269T(4) and Article 4.1(i);
- publish an issues paper on the composition of the Australian industry before the SEF, as the Commission did in the brandy investigation,[44] inviting producers, importers, downstream fabricators and exporters to address whether the operations in question constitute a substantial process of manufacture, having regard to the value added, the complexity of the operations and the investment in capital;
- state what the total estimated production volume of like goods comprises, how it was arrived at, and whether it has been tested;
- describe how double counting has been avoided in establishing total domestic production, or explain why it is unnecessary to address it; and
- complete, before the SEF, the verification of the manufacturing process and the reassessment of market size foreshadowed in the Consideration Report, and invite all Australian producers of like goods to identify themselves and their production within a reasonable period.

Yours sincerely,

Broad Windows and Doors and Curtain Wall System Co., Ltd

[44] Trade Measures Issues Paper No. 2006/117, Certain Brandy from France - Composition of Australian Industry.