

Well Smart Investment Holding (Bris) Pty Ltd

ABN 82 166 418 748 · ACN 166 418 748

Registered office: Suite 314, 89 High Street, Kew VIC 3101, Australia

Group office: Level 9, 116 Middle Road, Singapore 188972 · jackjia@wellsmart.com.sg · +65 9678 7771

21 October 2026

The Commissioner

Australian Trade Remedies Commission

By email to Investigations1@adcommission.gov.au (Investigations Unit 1; case manager Ms Neletta Lopa)

Investigation No. 691 – Alleged dumping and subsidisation of aluminium windows and doors exported from the People's Republic of China – Submission in response to Statement of Essential Facts No. 691

Item	Detail
Submitter	Well Smart Investment Holding (Bris) Pty Ltd (ABN 82 166 418 748, ACN 166 418 748) ("Well Smart")
Role in the investigation	Importer and end user (owner-developer); respondent to the Commission's importer questionnaire
Address	Registered office: Suite 314, 89 High Street, Kew VIC 3101. Project: Lindeman Island Resort, Lindeman Island QLD 4741. Group office: Level 9, 116 Middle Road, Singapore 188972
Contact	Mr Jack (Ruize) Jia, Director – jackjia@wellsmart.com.sg – +65 9678 7771. Alternate contact: Ms Penny Peng, Procurement Manager, procurement@wellsmart.com.sg, +65 9864 3870
Goods	Aluminium windows and doors (tariff subheading 7610.10.00)
Country of export	People's Republic of China
Submission lodged in response to	SEF 691 published 14 October 2026; lodged within the 20-day period under section 269TDAA of the Customs Act 1901
Versions lodged	Confidential version and this non-confidential version for the public record (section 269ZJ)

1. Introduction and interest of Well Smart

1.1 Well Smart is the owner and developer of the Lindeman Island Resort redevelopment, Lindeman Island, Whitsundays, Queensland. The project comprises Class 2 and Class 3 accommodation buildings and associated central facilities on an island site in cyclonic wind Region C under AS/NZS 1170.2.

1.2 For the guest accommodation buildings Well Smart imports thermally broken aluminium lift-and-slide door systems manufactured in Foshan, Guangdong, China by Foshan NF Windows and Doors System Co., Ltd, the supplier and manufacturer identified in Well Smart's importer questionnaire response (the AS 2047 test report names Foshan Weifan Doors and Windows Curtain Wall Co., Ltd, at the same address, as manufacturer of the tested system) ("NF"). Well Smart does not import conventional residential windows or doors of the kind that make up the bulk of the Australian industry's production.

1.3 Well Smart responded to the Commission's importer questionnaire and is an interested party. This submission responds to Statement of Essential Facts No. 691 ("SEF") published on 14 October 2026 and is lodged within the period under section 269TDAA of the Customs Act 1901.

2. Summary of submission

2.1 The goods Well Smart imports are a distinct, high-performance category: thermally broken lift-and-slide door systems, tested to AS 2047 at cyclonic-region pressures (ultimate ± 5.6 kPa, serviceability ± 1.6 kPa, water penetration resistance 500 Pa) and glazed with 39 mm laminated insulating glass units. No Australian producer offers a lift-and-slide door system with this combination of characteristics, and no Australian producer offered or tendered to supply the Lindeman Island project.

2.2 Because the Australian industry does not offer like or directly competitive goods in this category, imports of these goods cannot have caused or threatened material injury to the Australian industry. The Commission should take this into account in its findings on injury, causation and the non-injurious price, and in the form of any measures recommended.

2.3 Well Smart supports the exemption applications already before the Commission that would cover these goods, in particular the application by Broad Windows and Doors and Curtain Wall System Co., Ltd (EPR 691-449) in respect of goods for Class 2 and higher buildings on projects above 2,000 m² GFA, and the application(s) in respect of European-style lift-and-slide systems. Well Smart asks that these applications be determined in the final report rather than deferred.

2.4 Well Smart has lodged its own application for exemption under sections 8(7)(a) and 10(8)(a) of the Customs Tariff (Anti-Dumping) Act 1975 for a precisely defined category of thermally broken lift-and-slide door systems, with a comparison of the published specifications of the Australian sliding and lift-and-slide door systems. Well Smart asks that the application be considered concurrently with the investigation and, if granted, take effect from the date of application.

2.5 The rate proposed for "uncooperative and all other exporters" (dumping margin 70.4%, countervailable subsidy 2.9%) exceeds the highest margin verified for any examined exporter (51.6%). NF, a manufacturer whose only Australian customer is Well Smart, was not contacted directly by the Commission and did not lodge an exporter questionnaire. Well Smart asks that the all-others margin be reconsidered and explains NF's non-participation in section 7.2.

3. The goods imported by Well Smart and the Lindeman Island Resort project

The project

3.1 Lindeman Island is in the Whitsunday Islands, about 40 km south-east of Airlie Beach, Queensland. All buildings on the island are in wind Region C (AS/NZS 1170.2) and must be designed for cyclonic wind pressures. The resort is being delivered in phases; Phase 1 comprises 209 guest rooms in 14 accommodation blocks (Class 3), the Lindeman Island Apartments building (Class 2, 16 units) and the central facilities building, with a combined gross floor area well above 2,000 m². Phases 2 to 4 follow on the island, and Well Smart is also developing the Funnel Bay resort site near Airlie Beach, in the same wind region, so its requirement for these doors continues beyond Phase 1. Materials reach the island by barge from the mainland.

3.2 For the guest blocks, the structural engineer's documentation (STP Consultants, STP25-0011) adopts Region C design gust wind speeds of 79.4 m/s (ultimate) and 53.0 m/s (serviceability) for cladding, with internal pressure coefficients of +0.7 and -0.65, which gives an ultimate design pressure of about 5.1 kPa on the balcony doors away from corners. For the central facility, the certified wind assessment (eCoast Engineering, Form 15 of 2 September 2026) gives ultimate dynamic pressures of 2.19 to 2.45 kPa and net door pressures of about 3.0 to 4.1 kPa. External glazed doors must comply with AS 2047 at these pressures to satisfy the National Construction

Code. The buildings are air-conditioned hotel accommodation in a hot, humid climate; the design also calls for thermally broken frames to control condensation and energy use (NCC Section J) and for laminated glazing on both faces of the insulating glass unit for acoustic separation between guest rooms and for safety.

The goods

3.3 Well Smart imports the NF 150 Series thermally broken lift-and-slide door system. Its characteristics are:

Characteristic	NF 150 Series lift-and-slide door
Operation	Lift-and-slide: the handle lifts the sash off its sill seal before sliding; 200 kg lift-and-slide roller carriages and gear transmission
Frame	150 mm deep aluminium frame and sash, alloy 6063-T5, 2.0 mm wall thickness, steel-reinforced interlock
Thermal break	Polyamide (PA66 GF25) thermal break strips (Technoform) in frame and sash
Glazing	39 mm laminated insulating glass unit: 6 mm + 1.52 PVB + 6 mm / 12 mm spacer / 6 mm + 1.52 PVB + 6 mm, Low-E coated
Thermal performance	Uw about 2.0 W/m ² K for the typical 4,390 × 2,310 mm four-panel door, calculated to ISO 10077-1 (glass 73% of the area at Ug 1.5 W/m ² K by EN 673 for the 12 mm air cavity and triple-silver low-E coating; frame at Uf 2.8 W/m ² K, typical for 24 mm polyamide strips; glass edge 23.5 m at Ψ 0.08 W/mK); about 1.8 W/m ² K with argon fill. SHGC about 0.23 for the door (glass 0.30)
Panel size	Up to 1,100 mm wide × 2,500 mm high per sash, 120 kg
Finish and hardware	Powder coat to AAMA 2605; 316 stainless steel track channel
AS 2047 test evidence	Report AZHK260727, Azuma (Jiangmen) Testing Limited, NATA accreditation 20513 (ILAC-MRA), tested 8 July 2026 to AS/NZS 4420.1

3.4 The AS 2047 test results are: deflection (serviceability) $\pm 1,600$ Pa – pass; ultimate strength $\pm 5,600$ Pa – pass, no damage; water penetration resistance 500 Pa for 15 minutes – no leakage; air infiltration – "low" level (0.19 and 0.53 L/s·m² at ± 75 Pa); operating force – pass. The ultimate strength result covers the ultimate design pressure of the balcony doors on the guest blocks and the central facility.

Procurement history

3.5 Well Smart has purchased these doors from NF since October 2024, in eight batches covering the 209 guest rooms, the apartments and the central facility; the final guest-room batch was ordered in December 2025 and the central facility doors were shipped in September 2026. The volume purchased during the investigation period was reported in Well Smart's importer questionnaire response [Confidential – volume withheld]. NF sells ex-works to Well Smart's related procurement company in Singapore, which on-sells to Well Smart, as disclosed in that response. NF has no other Australian customer. Well Smart's forward requirement for these doors is about 10,000 m² over the next ten years, for Phases 2 to 4 on the island and for Funnel Bay, ordered in tranches as the development programme proceeds.

3.6 At the current security rate of 73.3% of export price, the provisional measures add about three-quarters of the ex-works price to every further door Well Smart imports for Phases 2 to 4 and Funnel Bay. On the forward requirement of 10,000 m² the all-others rate would add [Confidential – an amount in the range of AUD 2 to 4 million] to Well Smart's cost, with no corresponding benefit to any Australian producer, because none offers the goods.

4. The Australian industry does not offer like or directly competitive goods in this category

4.1 Well Smart has reviewed the published product data of the Australian aluminium window and door system suppliers and their fabricator networks. The Australian industry offers (a) thermally broken sliding and lift-and-slide doors rated for non-cyclonic pressures and (b) cyclonic-rated commercial sliding doors that are not thermally broken and are not lift-and-slide. It does not offer a thermally broken lift-and-slide door tested to AS 2047 at the pressures required in Region C and glazed with laminated insulating glass units of 36 mm or more.

Australian product (published data)	Lift-and-slide	Thermally broken	AS 2047 ratings SLS / ULS / water	Max glazing	Uw (lowest published)
NF 150 Series (the imported goods)	Yes	Yes (PA66 strips)	1,600 / 5,600 Pa / 500 Pa	39 mm laminated IGU	2.0 (calculated)
Capral Futureline thermally broken sliding door, lift-and-slide configuration	Yes	Yes	up to 1,200 / 3,000 Pa / 450 Pa	24–34 mm	2.2
Capral AGS 900 Series commercial sliding door	No	No	up to 6,000 / 10,500 Pa / 700 Pa (cyclonic tested)	19–26 mm double glazed	not published
Alspec ThermAFrame thermally broken sliding door	No	Yes	2,100 / 4,000 Pa / 630 Pa	24–28 mm	1.9
Alspec ProGlide commercial sliding door (cyclonic range)	No	No	3,500 / 8,900 Pa / 600 Pa (debris impact tested)	12.4 mm laminated single glazing	not published
AWS Elevate Series 704LS SlideMASTER lift-and-slide door	Yes	No	not published / not published / 300 Pa	24 mm IGU	2.3
AWS Vantage Series 731 ThermalHEART sliding door	No	Yes	not published	37.5 mm	2.3

4.2 The closest Australian product, the Capral Futureline lift-and-slide door, is rated to an ultimate pressure of 3,000 Pa and a serviceability pressure of 1,200 Pa and accepts glazing up to 34 mm. It cannot be certified for the façade pressures at Lindeman Island (ultimate about 5.1 kPa on the guest blocks, section 3.2) and cannot carry the specified 39 mm laminated insulating glass unit. The Australian cyclonic-rated sliding doors (Capral AGS 900, Alspec ProGlide) meet the pressures but are conventional sliding doors without a thermal break, limited to single laminated or thin double glazing. A purchaser who requires all of the specified characteristics cannot substitute any of them.

4.3 On the Commission's own approach, goods are "directly competitive" only where they have comparable features and rival each other in a commercial market, as a matter of fact and degree. In exemption inquiry EX0086 the Commission found that a significant difference in a single physical characteristic (gauge) meant the goods were neither like nor directly competitive. The differences here – operating mechanism, thermal break, tested pressure capacity and glazing capacity – are of the same order.

4.4 Well Smart did not invite Australian producers to tender for the Phase 1 doors, because its search of the Australian market found no product with the required combination of characteristics, and no Australian producer has approached Well Smart to offer one. Well Smart asks the

Commission, in examining the exemption application, to put the specification to the Australian system suppliers and producers named in that application and to treat a product as like or directly competitive only where the producer shows, with AS 2047 test evidence from a NATA or ILAC-MRA laboratory, that it has every characteristic.

5. Injury and causation

5.1 The SEF's injury analysis rests on the volume, price and profit data of the applicant and supporting Australian producers, whose production is dominated by residential and standard commercial windows and doors. No Australian producer tendered, quoted or offered to supply the lift-and-slide doors for the Lindeman Island project, and none offers a product that meets the specification. Imports of these goods therefore displaced no Australian sale and depressed or suppressed no Australian price.

5.2 Price comparisons in the SEF between imported and Australian goods are not like-for-like where the imported goods are a thermally broken lift-and-slide door with a 39 mm laminated insulating glass unit and the Australian comparator is a conventional sliding door with single or thin double glazing. Well Smart asks the Commission to confine its findings of price undercutting, depression and suppression to goods that the Australian industry actually offers, and to exclude from the volume and price effects the goods described in section 3.

5.3 The same point goes to the non-injurious price and the form of measures. A duty on goods the Australian industry does not produce cannot remove injury; it only raises the cost of Australian construction projects that have no domestic alternative. For an island resort in a cyclonic region the alternative is not an Australian door but a less capable door, or no project.

5.4 Well Smart also asks the Commission to have regard to the custom and usage of trade for projects of this kind: façade packages are specified by the design team, tendered as a package with the manufacturer's AS 2047 test evidence, and delivered to a fixed construction programme. Where no Australian producer participates in that tender, the imported goods are not in competition with Australian goods in any commercial sense.

6. Exemption applications before the Commission

6.1 The SEF records that applications for exemption have been lodged and will be considered in the final report. Well Smart supports, and asks the Commission to recommend, the following applications insofar as they cover the goods described in section 3:

- the application by Broad Windows and Doors and Curtain Wall System Co., Ltd (EPR 691-449) for goods installed in buildings of Class 2 or higher on projects above 2,000 m² GFA. The Lindeman Island project is such a project. Well Smart's experience confirms the factual basis of that application: no Australian producer tendered for or offered to supply the façade doors for its Class 2 and Class 3 buildings; and
- the application(s) in respect of European-style lift-and-slide ("Euro slider") systems, which describe the operating mechanism of the goods Well Smart imports.

6.2 Well Smart has lodged its own application for exemption under sections 8(7)(a) and 10(8)(a) of the Customs Tariff (Anti-Dumping) Act 1975 for thermally broken lift-and-slide door systems defined by objective, verifiable characteristics (lift-and-slide mechanism; polyamide thermal break; frame depth of 150 mm or more; AS 2047 test evidence from a NATA or ILAC-MRA laboratory at not less than ± 1.5 kPa serviceability, ± 5.0 kPa ultimate and 450 Pa water penetration; laminated insulating glass units of 36 mm or more). The application includes a comparison of the published specifications of the Australian sliding and lift-and-slide door systems and the calculation of the design wind pressures.

6.3 Well Smart asks that its application be examined concurrently with the investigation and determined in the final report, so that the Minister can decide the exemption together with the measures; and that any exemption take effect from the date of application, with securities collected on the exemption goods from that date refunded.

7. The rate applied to "uncooperative and all other exporters"

7.1 The SEF proposes a dumping margin of 70.4% for uncooperative and all other exporters, with a countervailable subsidy of 2.9%, against margins of 5.3% to 51.6% for the exporters individually examined and 24.4% for cooperating exporters not examined. A margin for non-examined exporters that is higher than the highest verified margin is not derived from the verified data of any exporter. Well Smart asks the Commission to set the all-others dumping margin at no more than the highest verified margin, consistent with the requirement to use facts available with special circumstances.

7.2 NF, the manufacturer of the goods Well Smart imports, has a single Australian customer, Well Smart, which it supplies through Well Smart's related procurement company. NF was not contacted directly by the Commission. Well Smart passed the Commission's preliminary information request to NF in December 2025, but NF, which has no export compliance function, did not lodge a response. NF's absence from the investigation is the absence of a response from a manufacturer with one overseas customer and no export compliance staff, not a refusal to cooperate; Well Smart will ask NF to participate in any review of measures or duty assessment concerning the goods it supplies.

7.3 Nothing in this section is intended to delay the final report. Well Smart's primary position is that the goods it imports should be exempted for the reasons in sections 4 to 6.

8. Requests

8.1 Well Smart asks the Commissioner to:

1. exclude thermally broken lift-and-slide door systems of the kind described in section 3 from the findings of price undercutting, price depression and price suppression, and from the volume effects attributed to the goods, because the Australian industry does not offer like or directly competitive goods;
2. recommend the exemption applications identified in section 6.1 insofar as they cover those goods, and determine Well Smart's own exemption application in the final report, with effect from the date of application;
3. set the dumping margin for uncooperating and all other exporters at no more than the highest verified margin; and
4. note the explanation of NF's non-participation in section 7.2, and that Well Smart will ask NF to participate in any review of measures or duty assessment.

8.2 Well Smart is willing to provide any further information the Commission requires, including project documents and import records.

Attachments (non-confidential version)

No.	Document	Status
1	AS 2047 test report AZHK260727, Azuma (Jiangmen) Testing Limited, NATA accreditation 20513	Public – attached
2	Manufacturer's product specification	Not attached – the specification is set out in section 3.3

No.	Document	Status
3	Design wind pressure on the balcony doors – calculation to AS/NZS 1170.2 from the project wind parameters (STP Consultants STP25-0011 S000; eCoast Engineering Form 15 of 2 September 2026 with report LIR-CALC-RF-01), reproduced as Attachment C of the exemption application	Public – attached
4	Well Smart's importer questionnaire response of 2 and 22 December 2025 – already held by the Commission; referred to, not re-attached	Not re-attached
5	Copy of Well Smart's application for exemption (lodged with this submission), non-confidential version	Public – attached

Yours faithfully

Jack (Ruize) Jia

Director

Well Smart Investment Holding (Bris) Pty Ltd