

Well Smart Investment Holding (Bris) Pty Ltd

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21 October 2026

The Commissioner

Australian Trade Remedies Commission

By email to Investigations1@adcommission.gov.au

Application for exemption from interim dumping duty, dumping duty, interim countervailing duty and countervailing duty – sections 8(7)(a) and 10(8)(a) of the Customs Tariff (Anti-Dumping) Act 1975 – Aluminium windows and doors exported from the People's Republic of China (Investigation No. 691) – Thermally broken lift-and-slide door systems

1. Applicant

Item	Detail
Applicant	Well Smart Investment Holding (Bris) Pty Ltd (ABN 82 166 418 748, ACN 166 418 748) ("Well Smart")
Street address	Registered office: Suite 314, 89 High Street, Kew VIC 3101. Project site: Lindeman Island Resort, Lindeman Island QLD 4741
Postal address	Level 9, 116 Middle Road, Singapore 188972 (group office)
Contact person	Mr Jack (Ruize) Jia, Director
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2. Applicant's interest

2.1 Well Smart is an importer and end user of the exemption goods. It is the owner and developer of the Lindeman Island Resort redevelopment, Lindeman Island, Whitsundays, Queensland, a multi-phase project of Class 2 and Class 3 accommodation buildings and central facilities in cyclonic wind Region C. Phase 1 comprises 209 guest rooms in 14 accommodation blocks, the Lindeman Island Apartments (16 units) and the central facility; 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. Well Smart imports thermally broken lift-and-slide door systems for these buildings, has a forward requirement of about 10,000 m² of these doors over the next ten years, and responded to the Commission's importer questionnaire in Investigation 691.

3. Other parties likely to be interested

Party	Interest
Foshan NF Windows and Doors System Co., Ltd (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), No. 1 West Road of Xianxi Reservoir, Shishan Town, Nanhai District, Foshan, Guangdong, China ("NF")	Manufacturer of the exemption goods imported by Well Smart

Party	Interest
[Confidential – Well Smart's related procurement company, name withheld]	Buys the goods ex-works from NF and sells them to Well Smart, as disclosed in Well Smart's importer questionnaire response
Ventora Group Pty Ltd and the Australian Glass and Window Association	Applicant and supporting industry body in Investigation 691
Capral Limited; Aluminium Specialties Group Pty Ltd (Alspec); Architectural Window Systems Pty Ltd (AWS); G.James Glass & Aluminium Pty Ltd; Reynaers Australia Pty Ltd; Schüco Australia Pty Ltd; Vitrocsa Australia Pty Ltd; Wintec Systems; Darley Aluminium	Australian system suppliers and producers of sliding and lift-and-slide doors, whose published products are compared in section 7.3 and who may be consulted on this application
Australian Border Force	Administration of any exemption

4. Investigation to which the application relates

4.1 Investigation No. 691 into alleged dumping and subsidisation of aluminium windows and doors exported from the People's Republic of China. Preliminary affirmative determination and securities from 15 October 2026 (TRN 2026/147); Statement of Essential Facts published 14 October 2026; final report due 16 December 2026.

4.2 The goods the subject of the investigation are fully and partially assembled aluminium windows and doors, with or without glass, thermally broken or not, classified to tariff subheading 7610.10.00 of Schedule 3 to the Customs Tariff Act 1995. Well Smart asks that this application be examined concurrently with the investigation (as the Commission has done with the other applications on the public record) and determined in the final report.

5. Ground relied on

5.1 Section 8(7)(a) of the Customs Tariff (Anti-Dumping) Act 1975 (dumping duty) and section 10(8) (a) (countervailing duty): like or directly competitive goods are not offered for sale in Australia to all purchasers on equal terms under like conditions, having regard to the custom and usage of trade.

6. The exemption goods

6.1 Exemption is sought for the following goods, whether glazed or unglazed and whether fully or partially assembled:

Thermally broken aluminium lift-and-slide door systems having all of the following characteristics:

1. a lift-and-slide operating mechanism, by which the operating handle raises the sliding sash off its sill seal on roller carriages before the sash slides, and lowers it onto the seal when closed (as distinct from conventional sliding doors);
2. aluminium frame and sash profiles incorporating a polyamide thermal break, with an overall frame depth of not less than 150 mm;
3. test evidence under AS 2047 (test methods AS/NZS 4420.1) issued by a laboratory accredited by NATA or by a signatory to the ILAC Mutual Recognition Arrangement, demonstrating a serviceability (deflection) pressure of not less than $\pm 1,500$ Pa, an ultimate strength pressure of not less than $\pm 5,000$ Pa and a water penetration resistance of not less than 450 Pa; and
4. glazed with, or designed and supplied for glazing with, laminated insulating glass units of overall thickness not less than 36 mm in which both panes are laminated.

6.2 The exemption goods as imported by Well Smart are the NF 150 Series lift-and-slide door system described in section 7.1. The description in 6.1 is drawn so that it covers that system and any equivalent system, and excludes every lift-and-slide or sliding door currently offered by the Australian industry (section 7.3).

7. Statement of reasons

7.1 Technical characteristics of the exemption goods

Characteristic	NF 150 Series lift-and-slide door
Operation	Lift-and-slide; 200 kg lift-and-slide roller carriages and gear transmission; steel-reinforced interlock
Frame and sash	150 mm deep, aluminium alloy 6063-T5, 2.0 mm wall thickness
Thermal break	Polyamide PA66 GF25 strips (Technoform) in frame and sash
Glazing	39 mm laminated IGU: 6 mm + 1.52 PVB + 6 mm / 12 mm spacer / 6 mm + 1.52 PVB + 6 mm, Low-E
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)
Sash size	up to 1,100 mm × 2,500 mm, 120 kg
Finish and hardware	AAMA 2605 powder coat; 316 stainless steel track channel
AS 2047 test evidence (Attachment A)	Report AZHK260727, Azuma (Jiangmen) Testing Limited, NATA accreditation 20513 (ILAC-MRA), tested 8 July 2026: deflection ±1,600 Pa pass; ultimate ±5,600 Pa pass; water penetration 500 Pa nil leakage; air infiltration low; operating force pass

7.2 Why these characteristics are specified

7.2.1 Lindeman Island is in wind Region C. 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 (Attachment C). External glazed doors must be shown to comply with AS 2047 at those pressures for the building to satisfy the National Construction Code. A door rated below the design pressure cannot be installed, whatever its other merits.

7.2.2 The buildings are air-conditioned hotel rooms in a hot, humid climate. Thermally broken frames are specified to limit condensation on the room side of the frame and to meet the energy requirements of NCC Section J; laminated glass on both faces of the insulating glass unit is specified for acoustic separation between rooms and for safety and cyclone resilience. Lift-and-slide operation is specified because sashes of 120 kg with 39 mm glass cannot be operated comfortably as conventional sliding doors, and because the lift-and-slide seal gives the water and air performance recorded in the test report.

7.3 Goods offered for sale by the Australian industry

7.3.1 Well Smart has reviewed the published technical data of the Australian window and door system suppliers and producers. The Australian industry offers two kinds of product relevant to this application, neither of which has the characteristics in section 6.1:

Australian product (published data)	Lift-and-slide	Thermally broken	AS 2047 SLS / ULS / water	Max glazing	Lowest published Uw
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

7.3.2 Reynaers Australia, Schüco Australia and Vitrocsa Australia supply European-designed systems fabricated in Australia. Their published Australian material does not identify a thermally broken lift-and-slide door with AS 2047 test evidence at the pressures in section 6.1(3), and the Commission's consultation of the Australian industry on this application will identify one if it exists.

7.4 Procurement history and consultation of Australian producers

7.4.1 Well Smart did not invite Australian producers to tender for the Phase 1 doors. Its search of the Australian market in 2024, repeated for this application and recorded in section 7.3, found no product with the required combination of characteristics, so there was no compliant Australian product to call tenders for; the doors were specified and procured from NF on the strength of its system and test evidence.

7.4.2 Well Smart asks the Commission, in examining this application, to put the description in section 6.1 to the Australian system suppliers and producers named in section 3 (Capral, Alspec, AWS, G.James, Ventora, Reynaers Australia, Schüco Australia, Vitrocsa Australia, Wintec Systems, Darley Aluminium and the Australian Glass and Window Association) 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 in section 6.1.

7.5 The exemption goods are neither like goods nor directly competitive goods

7.5.1 Like goods are goods identical to, or closely resembling, the exemption goods (section 269T(1) of the Customs Act 1901). No Australian product has the four characteristics in section 6.1. The Australian thermally broken lift-and-slide door (Capral Futureline) is rated to serviceability and ultimate pressures of 1,200 Pa and 3,000 Pa, against 1,600 Pa and 5,600 Pa for the exemption

goods, and accepts glazing up to 34 mm; the Australian cyclonic-rated sliding doors (Capral AGS 900, Alspec ProGlide) are conventional sliding doors without a thermal break.

7.5.2 Goods are directly competitive where they have comparable features and rival each other in a commercial market, as a matter of fact and degree; they do not merely remotely or indirectly compete. A door that cannot be certified for the design wind pressure cannot be purchased for the building at all, so it does not rival the exemption goods for that purchase; a cyclonic-rated door without a thermal break or laminated insulating glass does not meet the specification and is not purchased for the same use. In 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 go to four characteristics.

7.5.3 Well Smart is not seeking exemption for high-performance doors generally, or for lift-and-slide doors generally. The description in section 6.1 is confined to the combination of characteristics that the Australian industry does not offer. If the Commission is satisfied that an Australian producer offers goods with that combination, Well Smart will accept a narrower description.

7.6 Custom and usage of trade

7.6.1 Façade doors for a project of this kind are specified by the design team to the engineer's design pressures and the NCC, tendered as a package with the manufacturer's test evidence, and delivered to a construction programme. The custom of the trade is that a producer competes by tendering a compliant product. No Australian producer has done so for the Lindeman Island project.

8. Identification of the exemption goods at the border

8.1 Each characteristic in section 6.1 is objective and can be verified from the goods and their documents: the lift-and-slide hardware and the polyamide thermal break are visible in the profile; the frame depth is measurable; the glazing specification appears on the glass supplier's certificate; and the AS 2047 test report from a NATA or ILAC-MRA laboratory accompanies the consignment. Well Smart proposes that an importer claiming the exemption hold the test report and the manufacturer's product declaration for each consignment and produce them to the Australian Border Force on request.

9. Request and date of effect

9.1 Well Smart asks the Commissioner to recommend that the Minister exempt the goods described in section 6.1 from interim dumping duty, dumping duty, interim countervailing duty and countervailing duty under sections 8(7) and 10(8) of the Customs Tariff (Anti-Dumping) Act 1975, with effect from the date of this application, and to examine the application concurrently with Investigation 691 so that it is determined in the final report.

9.2 Well Smart will respond to any questionnaire the Commission issues.

10. Declaration and attachments

I declare that the information in this application is complete and correct to the best of my knowledge.

Jack (Ruize) Jia

Director

Well Smart Investment Holding (Bris) Pty Ltd

21 October 2026

Attachment	Document	Status
A	AS 2047 test report AZHK260727, Azuma (Jiangmen) Testing Limited, NATA accreditation 20513	Public – attached
B	Manufacturer's product specification	Not attached – the specification is set out in section 7.1
C	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) – set out below	Public – attached
D	Published product data of the Australian systems compared in section 7.3 (the brochures and web pages at the links in the table)	Public – attached
E	Lindeman Island Resort project description: location, building classes, approvals, programme – set out below	Public – attached
F	Well Smart's importer questionnaire response in Investigation 691 (2 and 22 December 2025) – already held by the Commission; referred to, not re-attached	Not re-attached

Attachment C – Design wind pressure on the balcony doors (calculation to AS/NZS 1170.2)

Lindeman Island is in wind Region C. For the guest blocks the calculation uses the wind parameters in the structural engineer's documentation (STP Consultants, STP25-0011 S000): design gust wind speed 79.4 m/s (ultimate, cladding) with internal pressure coefficients +0.7 and –0.65 (dominant-opening case). For the central facility it uses the certified wind assessment (eCoast Engineering, Form 15 of 2 September 2026; report LIR-CALC-RF-01): ultimate design wind speeds 60.4 to 63.9 m/s, dynamic pressure 2.19 to 2.45 kPa, with the same internal pressure coefficients.

Dynamic pressure $q = 0.6 \times V^2 \times 10^{-3}$ kPa. Net pressure on a door $p = q \times (C_{p,e} \times K_I - C_{p,i})$, with $C_{p,e} = +0.7$ on the windward wall and –0.65 on side walls, and the local pressure factor $K_I = 1.5$ within a distance a of a windward corner.

Building	q (ultimate)	Inward, windward wall: $(0.7 + 0.65) q$	Outward, side wall, general: $(0.65 + 0.7) q$	Outward, within a of a corner: $(0.65 \times 1.5 + 0.7) q$
Guest blocks (STP25-0011; $V = 79.4$ m/s)	3.78 kPa	+5.1 kPa	–5.1 kPa	–6.3 kPa
Central facility (LIR-CALC-RF-01; $V = 60.4$ to 63.9 m/s)	2.19 to 2.45 kPa	+3.0 to +3.3 kPa	–3.0 to –3.3 kPa	–3.7 to –4.1 kPa

The ultimate design pressure on the balcony doors is therefore about 5.1 kPa on the guest blocks and 3.0 to 4.1 kPa on the central facility. A door system rated to an ultimate pressure of 3,000 Pa, the rating of the Australian thermally broken lift-and-slide door in section 7.3, cannot be used on the guest blocks and only on the general wall zones of the central facility. The NF 150 Series, tested to $\pm 5,600$ Pa, covers the general façade zones of the guest blocks and the whole of the central facility.

Attachment E – Project description

Location. Lindeman Island is in the Whitsunday Islands, Queensland, in the Mackay Regional Council area, about 12 km south of Hamilton Island. Access is by boat from Hamilton Island or Shute Harbour or by the island airstrip; all construction materials arrive by barge. The site is in wind Region C under AS/NZS 1170.2.

The project. The Lindeman Island Resort has been out of use since it was badly damaged by Cyclone Yasi in 2011. Well Smart Investment Holding (Bris) Pty Ltd owns the resort and is restoring it in phases. Phase 1 refurbishes and extends the existing resort as a 209-room hotel: 14 guest blocks, a central facility (restaurants, bar, lobby, event spaces and kitchen) and a leisure building (spa and gym), together with the water and sewage treatment plants, an 11 kV network, roof-mounted solar and battery storage, and a new jetty. The hotel will operate under Marriott International's Le Méridien brand under a hotel management agreement with La Vie Hotels and Resorts.

Building classes. The guest blocks are Class 3 buildings (hotel accommodation). The central facility and leisure building are Class 6 and Class 9b. All are subject to the National Construction Code, including the requirement that external glazed doors comply with AS 2047 at the site design wind pressures (Attachment C). The guest blocks are therefore Class 2 or above buildings of the kind covered by the exemption application of Broad Windows and Doors (EPR 691-449).

Approvals. The redevelopment proceeds under Mackay Regional Council Decision Notice DA-2024-182 (preliminary approval for a material change of use for the resort complex, decided 16 July 2025), which carries the Coordinator-General's conditions from the project's environmental impact statement and the approved Plan of Development HRP15078. Building work on Phase 1 is certified stage by stage; the structural engineering is by STP Consultants (STP25-0011) and the site wind assessment is certified by eCoast Engineering (Form 15, 2 September 2026).

Programme. The remaining Phase 1 works run from September 2026 to mid-2027. Guest rooms are handed over from November 2026 to March 2027 and the hotel is programmed to open in September 2027. The lift-and-slide doors for Phase 1 were ordered from October 2024 and delivered in batches to October 2026.

Later phases. Staff and manager accommodation (2027 to 2028), Phase 2 (a villa resort, from 2027), Phase 3 (the Village Centre) and Phase 4 (residential villas, rolling to 2032 and beyond) follow on the island, and Well Smart's Funnel Bay development on the Whitsunday mainland is in the same wind region. Together they require about 10,000 m² of door area to the same specification over the next ten years, with the first tranche of about 1,000 m² expected within twelve months.