



Dear Case Manager,

I am writing on behalf of Polite in Australia Pty Ltd (PIA Windows), an Australian business specialising in the supply and installation of aluminium windows and doors for residential and commercial construction projects.

We would like to provide information regarding our business, manufacturing arrangements and the potential impact of Investigation No. 691 on our operations.

We also seek clarification on the scope of products covered by the investigation and the treatment of products manufactured by a newly established overseas manufacturer.

1. Background of PIA Windows

PIA Windows operates in the Australian construction industry, supplying aluminium window and door systems for residential and commercial projects.

Our business is involved in product development, technical coordination, project-specific design, procurement, supply and installation.

We work with builders, developers and façade consultants to ensure that the systems supplied are suitable for the relevant project requirements and applicable Australian standards.

Our business has established relationships within the Australian construction industry and has supplied products through Chinese manufacturing and trading arrangements for several years.

2. Development of Our Proprietary APS System

In 2024, PIA Windows commenced the development of its proprietary aluminium window and door system, known as the APS System.

The objective was to develop a system suitable for Australian residential and commercial construction requirements, with particular emphasis on technical performance, quality control and project-specific applications.

During the initial development period, manufacturing was outsourced to an existing manufacturer in Zhongshan, China.

However, we experienced ongoing challenges involving the implementation of technical designs, production scheduling and manufacturing quality.

These difficulties created commercial and operational risks, particularly for projects involving strict construction programmes and technical requirements.

As a result, in November 2025, a decision was made to establish a dedicated manufacturing operation in China.

Zhongshan Yaoguang Windows and Doors Co., Ltd. was established in November 2025 to support the manufacturing of the APS System.

This decision was driven by manufacturing quality, production management and the long-term development of our products.

It was not a restructuring undertaken for the purpose of avoiding anti-dumping measures.

3. Historical Supply Chain and Current Manufacturing Arrangements

During the investigation period from 1 July 2024 to 30 June 2025, PIA Windows sourced aluminium window and door products through Chinese trading companies from different manufacturing suppliers.

At that time, Zhongshan Yaoguang Windows and Doors Co., Ltd. did not exist.

Following the establishment of Yaoguang in November 2025, the company commenced supplying products to the Australian market in early 2026.

The initial export arrangements were primarily handled through Jinan Jinzhou, a related Chinese trading company.

From approximately August 2026, the export arrangements changed to an independent trading company based in Suzhou.

Under the current arrangement, Yaoguang manufactures the products, the Chinese trading company undertakes the export transactions, and PIA Windows receives the products in Australia.

We would appreciate clarification on how the applicable anti-dumping duty rate is determined when the manufacturer and exporter are separate legal entities.

In particular, we wish to understand whether a change in the exporting trading company affects the duty treatment of products manufactured by the same factory.

4. Clarification of Product Scope – Commercial Window Wall Systems

PIA Windows supplies a range of aluminium window and door products, including systems used in commercial construction.

Certain commercial applications involve what we describe as Window Wall Systems.

These systems may consist of individual factory-assembled window units manufactured in China and subsequently connected and installed on site in Australia.

For example, individual units may be less than 3 metres in height and 4 metres in width, while the completed installed system may extend approximately 50 metres horizontally.

The individual units are connected using project-specific mullions, subheads, subsills and associated components.

The completed system may be designed and tested to AS/NZS 4284, depending on the project requirements.

We understand that the scope of goods covered by an anti-dumping investigation must be determined by the official goods description and applicable findings, rather than by commercial product names alone.

We therefore request clarification on whether these types of commercial Window Wall Systems fall within the goods under consideration in Investigation No. 691.

In particular, we would appreciate guidance on whether the Commission distinguishes between:

- Conventional residential aluminium windows and doors;
- Factory-assembled commercial window units;
- Window Wall Systems designed for installation as part of a larger building envelope; and
- Other façade-related systems with different construction methods and performance requirements.

We are prepared to provide technical drawings, product descriptions, manufacturing details, photographs and relevant test reports to assist with this assessment.

5. Impact on Australian Construction Projects

As an Australian business supplying the construction industry, PIA Windows is concerned about the potential commercial impact of additional duties on aluminium windows and doors imported from China.

The construction industry is already subject to significant cost pressures, including labour, materials, financing and project delivery costs.

Additional import duties may increase the cost of supplying compliant window and door systems to Australian building projects.

For projects where pricing has already been submitted or commercial commitments have been made, unexpected changes in import costs may create additional financial risks for suppliers and builders.

We recognise the importance of Australia's anti-dumping framework and support fair competition.

At the same time, we believe that clear guidance regarding product coverage and the treatment of newly established manufacturers is important for Australian businesses making procurement and project delivery decisions.

6. Request for Clarification

We respectfully request the Commission's guidance on the following matters:

1. How should PIA Windows determine the applicable duty rate when importing products manufactured by Yaoguang through a separate Chinese trading company?
2. How does the Commission treat products from a manufacturer that was established after the investigation period and therefore did not have an opportunity to participate individually in the original investigation?
3. If Yaoguang becomes eligible for an accelerated review or another individual assessment, how would any resulting duty rate apply to products imported by PIA Windows?
4. Would the applicable treatment depend on the identity of the Chinese exporting trading company?
5. Are the commercial Window Wall Systems described above included within the goods under consideration in Investigation No. 691?
6. What technical information would the Commission require to provide a written clarification regarding the product scope?
7. What procedures are available to an Australian importer seeking clarification on product coverage or the application of anti-dumping duties?
8. Can PIA Windows provide additional information as an interested Australian importer, and can this correspondence be included in the official investigation record?

7. Closing

PIA Windows is committed to complying with all applicable Australian laws, regulations and product standards.

Our objective is to obtain clarity regarding the investigation and ensure that our manufacturing and import arrangements are assessed accurately and transparently.

We would appreciate the Commission's guidance and would be pleased to provide further commercial or technical information as required.

Thank you for your consideration.

Kind regards,

Angus Hill

On behalf of Polite in Australia Pty Ltd
Australia