NON-CONFIDENTIAL PUBLIC RECORD VERSION

Non-confidential counterpart of the submission dated 3 November 2026. The project drawing and detailed laboratory report are withheld because they contain proprietary technical information. The following summaries provide the substance relevant to the request for clarification.

3 November 2026

Director – Investigations 1
Australian Trade Remedies Commission
Email: investigations1@atrc.gov.au

Investigation 691 – Aluminium Windows and Doors from China

Response to Statement of Essential Facts No. 691: clarification of dimensional assessment of partially assembled window systems and staged consignments

Dear Director,

Facades Management (QLD) Pty Ltd, working with Pearl Facades, requests express clarification of the dimensional assessment of project-specific aluminium window systems supplied in stages, including systems incorporating subheads, subsills and vertical termination waterproofing angles. We seek a practical, consistent interpretation for window schedules, packing lists and customs declarations.

1. Basis for the request

SEF 691, section 3.3 (page 70), describes the goods under consideration as including fully or partially assembled aluminium window assemblies, including fabricated frames, panels and sashes, up to and including 3,000 mm high and 4,000 mm wide. The description includes fabricated assemblies supplied individually or connected to others even where the combination does not form a completed unit.

Separately, Table 5 (page 28) describes a window assembly as a complete assembled window unit comprising all components necessary for installation and operation as a window, referring to AS 2047:2014. We ask the Commission to explain how these definitions interact where integral parts of one engineered system must be shipped and fitted in stages.

2. Engineered system and construction sequence

Our window systems are designed for project-specific structural openings. The specified subhead forms the upper installation and sealing interface, including provision for anticipated movement and sealant configuration. The subsill provides the designed water-management and drainage arrangement. Vertical termination waterproofing angles provide specified perimeter waterproofing interfaces. We do not regard these as optional decorative accessories where they are integral to the relevant system design.

The required clearances and dimensions reflect waterproofing, sealant joint requirements, anticipated structural deflection and installation methodology. For the relevant design, 10 mm gaps are specified at subhead and subsill interfaces. The installation sequence commonly requires these perimeter components to be fixed to the structure before the principal window frame is fitted.

Accordingly, subheads, subsills and vertical termination angles are often shipped first. The corresponding fabricated frames, panels and sashes arrive in later consignments, linked to the same project and window references. The staggered delivery is a construction sequencing requirement, not a claim that parts in separate consignments are physically assembled at entry.

3. Specific dimensional issue

A principal frame can measure less than 3,000 mm when imported while the specified installed system and its structural opening exceed 3,000 mm. In such cases there may be three different figures: the structural opening, the engineered installed-system envelope, and the fabricated frame/sash dimensions. We ask whether the dimensional criteria apply to each separately imported partial assembly, or whether the dimensions of the complete specified system can be considered where the individual shipments are demonstrably linked.

Appendix 1 summarises a representative window schedule identifying a 3,065 mm structural opening (S.O.), a 3,045 mm W.S. dimension and a 3,000 mm frame size (F.S.). The proprietary source drawing is provided only with the confidential version.

Appendix 2 summarises an independent AS 4420.1 test report assessing compliance with AS 2047 (Report 251-211a, issued 30 January 2026). The complete 17-page report and detailed specimen drawings are provided only with the confidential version. The test concerns a separate sample from Appendix 1.

4. Proposed routine identification documents

We propose that a standard window schedule and the usual commercial packing lists be the ordinary documentation used to identify the goods and the relationship between staged consignments. These would record:

- Structural opening height and width, with the overall specified window dimensions clearly distinguished from frame dimensions.
- Fabricated frame height and width, individual sash/panel dimensions and assembly status.
- Subhead and subsill identification and lengths, and vertical termination waterproofing angle identification and lengths.
- Consistent project/window references linking first-stage perimeter components with subsequent frame and panel shipments.

This proposal does not seek to restrict the Commission or Australian Border Force from requesting substantiation where appropriate. It seeks to avoid making full technical reports and calculations a routine attachment for each shipment where the relevant dimensions can be transparently disclosed in the window schedule and packing list.

5. Clarifications requested

1. Where a complete engineered window installation exceeds 3,000 mm high but a separately imported fabricated frame, panel or sash does not, which measurement governs the goods description?
2. Can structurally necessary subheads, subsills and vertical termination waterproofing components be included in dimensional assessment where they form part of the same specified window system, even though they are delivered and installed first?
3. Does the answer change where the first consignment contains subheads, subsills and vertical angles and a later consignment contains the corresponding frames, panels and sashes?
4. What distinction does the Commission make between structural opening, completed installed-system envelope and fabricated frame/sash dimensions?
5. Would the Commission accept window schedules and packing lists identifying each of those dimensions and linking components across shipments as the routine identification method?
6. How should the 4,000 mm window width limit be applied in the same circumstances, and do the same principles apply to the respective door height and width limits?
7. For avoidance of doubt, does a separately imported fabricated frame measuring exactly 3,000 mm high remain within the goods description where its designated structural opening is greater than 3,000 mm?

6. Conclusion

We submit that the structural opening and complete tested installation are relevant technical dimensions and that shipment sequence alone should not determine whether a system component is integral. We nevertheless acknowledge that section 3.3 expressly addresses individually supplied partial assemblies. We request a specific written explanation of which dimensions govern those goods, including staged importations, preferably in the final findings or separate written clarification.

We provide non-confidential summaries of a representative schedule and a separate independent laboratory report to illustrate our position. The full proprietary documents accompany the confidential version and further targeted information can be provided where appropriate.

Yours faithfully,

Authorised representative
Facades Management (QLD) Pty Ltd / Pearl Facades

Appendix 1 – Non-confidential schedule summary

The confidential version includes project drawing 01-100, titled “test rig”, revision 2, dated 28 August 2026. The drawing is a representative example and not the same window specimen as the report in Appendix 2.

The drawing identifies a structural opening (S.O.) height of 3,065 mm, an overall dimension labelled W.S. of 3,045 mm, and a frame size (F.S.) height of 3,000 mm. It also identifies a structural opening width of 3,826 mm. These distinct dimensions illustrate the measurement issue raised in the submission.

Non-confidential summary of omitted material: The drawing contains proprietary project-specific window geometry, panel sizes and technical drafting information. It is withheld from this public-record version. The full drawing is available in Appendix 1 of the confidential submission.

Appendix 2 – Non-confidential laboratory report summary

Test report 251-211a, issued 30 January 2026 by CiiLOCK Engineering / SIGMATIC Testing Laboratories, concerns a Queensland Façade Mira F-AW-F combination identified on the report cover as measuring 3,910 mm by 2,860 mm (subject to its specimen drawings). The report is a separate example and is not a test of the Appendix 1 window schedule.

The report records testing under AS 4420.1 for compliance with AS 2047. Its summary records passing outcomes for deflection, operational force, air infiltration, water penetration and ultimate strength. The specimen appendix identifies weather-seals, gaskets, joint sealants, hardware and drainage by reference to accompanying drawings.

The proprietary laboratory setup, specimen drawings and detailed measurement data are withheld from this public-record version. The full report, including its existing CONFIDENTIAL watermark, is included as Appendix 2 of the confidential submission. This report does not, of itself, establish that structural-opening dimensions are the correct measure for anti-dumping scope purposes.