CAPRAL ALUMINIUM
SHAPING THE FUTURE

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Director
Investigations 1
Australian Trade Remedies Commission
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Dear Director,

Public File

Investigation No. 691 – Aluminium windows & doors from China
Industry submission in support of the Statement of Essential Facts

1. Introduction

Capral Limited (**Capral**) makes this submission to Investigation 691 (**INV 691**) concerning aluminium windows and doors (**AWDs**) exported to Australia from the People's Republic of China (**China**), in response to Statement of Essential Facts No. 691 (**SEF 691**), published on 14 October 2026.[1]

Capral is Australia's largest manufacturer and distributor of aluminium extrusions. It designs and supplies the aluminium window and door systems, and the extrusions, used by Australian AWD fabricators across the residential, multi-residential and commercial markets. Capral is also part of the Australian industry in respect of the measures on aluminium extrusions exported from China.

Capral supports the principal findings in SEF 691, the preliminary affirmative determination and the taking of securities from 15 October 2026, subject to the matters raised in this submission.[2] This submission is specific to the matters where Capral can comment directly, these being:

- its position in the AWD supply chain, and the claims made by EcoEco;
- window wall and building classes, and the six exemption requests;
- the aluminium extrusion benchmark, and the assessment of exporters' aluminium costs;
- the aluminium subsidy findings; and
- the form of measures, and how the measures will operate prospectively.

2. Supportive observations on SEF 691

Capral supports the Commissioner's preliminary findings. In particular, Capral agrees that:

- window wall is within the goods description and is like goods, and is distinct from curtain wall, which is the only product specifically excluded;[3]

- the Australian industry produces and supplies AWDs across Class 1 to Class 9 buildings and each market segment, and had available capacity to supply larger and more complex projects;[4]

[1] EPR 691, document no. 501.
[2] SEF 691, sections 1.2, 1.2.1 and 13.3, pp. 10–12 and 216–217.
[3] SEF 691, section 1.2.5, p. 14; section 4.6.1, pp. 89–94.
[4] Ibid, section 1.2.5, p. 15; section 4.7.3, pp. 100–101.

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- the application was supported by a sufficient part of the Australian industry, having regard to the submissions on standing made by EcoEco and others;[5]
- a particular market situation (PMS) existed in the Chinese domestic market for AWDs, arising from the influence of the Government of China (GOC) over the Chinese aluminium and glass markets;[6]
- every selected/cooperative exporter (other than Altop) exported the goods at dumped prices, at margins of between 5.3 and 51.6 percent;[7]
- the Australian industry has suffered material injury, including through lost sales volume, price suppression, reduced market share and reduced profits, capital investment and employment, caused by dumped and subsidised imports;[8] and
- dumping and subsidisation may continue, with exporters found to have dumped accounting for approximately 94 percent of import volumes in FY2026, and through to 31 August 2026.[9]

Capral notes the relevance of the PMS finding vis-à-vis aluminium. Aluminium extrusions are the largest input to AWDs, at approximately 37 percent of the selected exporters' cost to make.[10] The findings concerning the GOC's influence over the Chinese aluminium industry are consistent with the Commission's findings in Anti-Dumping Commission Report No. 657 (REP 657), and with Capral's own experience of competing against Chinese extrusions in the Australian market.

Capral also notes that the Commission's causation analysis relied (in part) on statements from 38 of Capral's customers, describing lost tenders, reduced margins and reduced capacity utilisation across residential, multi-residential and non-residential projects.[11] These customers are the AWD fabricators that comprise much of the Australian industry. Each sale lost to dumped imports is also a loss of the extrusions and systems Capral supplies to them.

3. Capral's position in the supply chain and EcoEco's claims

EcoEco has contended in its submissions that the injury experienced by the Australian industry is attributable to the industry's own input costs, including the price of Australian aluminium extrusions, rather than to dumped imports. Capral has responded to those claims.[12]

On standing, SEF 691 considered EcoEco's submissions and representation, and the Commission remains satisfied that the requirements were met.[13] Capral supports that conclusion. So that the final report deals with EcoEco's remaining claims, Capral makes the following points.

Capral supplies the input, not the goods

Capral is an extruder and systems supplier, not the producer of the goods. The cost to make and sell (CTMS) of finished AWDs sits with Ventora and the AWD fabricators that comprise the Australian industry, and is the information the Commission has verified. EcoEco had requested Capral to produce a worked, window-level calculation of the effect of removing aluminium costs.[14] Capral reiterates from its earlier representations that it does

[5] Ibid, sections 2.4.2 and 2.4.11, pp. 29 and 44–50; section 4.3, pp. 83–84.
[6] Ibid, section 6.4, pp. 132–134; Appendix A, pp. 262–307.
[7] Ibid, section 6.1, Table 12, p. 129.
[8] Ibid, section 8.1, p. 168; chapter 9.
[9] Ibid, section 10.2, p. 205.
[10] Ibid, Appendix A5, p. 268 and Appendix A9, p. 286.
[11] SEF 691, section 9.6.1, pp. 189–193.
[12] EPR 691.
[13] SEF 691, sections 2.4.2 and 2.4.11, pp. 29 and 44–50.
[14] EPR 691, document no. 448.

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not hold that information, and it is not Capral's role to provide it. The assessment of the industry's costs and prices is for the Commission, on the verified data it holds.

The 'zero-cost aluminium' argument

EcoEco's earlier arguments support the Commission's SEF findings. If the cost of aluminium were removed entirely from the Australian industry's verified CTMS, and a price gap with Chinese imports remained, that gap could not be explained by Australian aluminium prices. It could only be explained by the price of the AWD imports, which SEF 691 has found to be dumped.

The counterfactual

EcoEco's counterfactual position assumes a different Australian supply chain, in which the industry sources its inputs on the terms EcoEco does offshore. As Capral previously submitted, the issue is how the Australian industry would have performed, with its existing cost structure, in the absence of the dumped imports. If the industry had to adopt the cost structure of the importers it competes with before injury could be found, injury caused by dumping would never be established.

Australian industry costs

SEF 691 describes the increase in the Australian industry's costs as *…unrelated to Chinese imports…*,[15] while also recognising that declining production volumes increased Ventora's fixed costs per unit.[16] Where volumes were lost to dumped imports, the resulting increase in unit costs is a consequence of the dumping. Capral requests that the final report reflect this.

4. Window wall and building classes

SEF 691 finds that window wall is within the goods description and is like goods, that the use of AS 4284 testing does not remove the goods from scope, and that the Australian industry produces and supplies AWDs across Class 1 to Class 9 buildings.[17] Capral supports these findings. They reflect the systems Capral supplies and the projects on which those systems are used.

Confidential Appendix A provides 60 project examples demonstrating the capability of Capral and its Australian fabricator network to supply window and door solutions for class 2 building applications and beyond. These examples include applications of multi-storey residential, commercial, education, healthcare and community developments. These projects demonstrate our fabricators' experience in manufacturing and installing Capral systems to meet the technical, performance and delivery requirements of these sectors.

Window wall is an established application for Australian-made systems, and Capral supports its inclusion within the scope of this investigation.

5. Exemption requests

SEF 691 records six exemption requests,[18] these being:

[15] SEF 691, section 9.8, p. 197.
[16] Ibid, section 9.9.4, p. 200.
[17] SEF 691, section 4.6.1, pp. 89–94; section 4.7.3, pp. 100–101.
[18] SEF 691, section 1.2.5, p. 15; section 3.7, Table 10, pp. 74–77.

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Application from	Description	Contested by
CGT Law	Window wall façade systems or any goods produced to Australian Standards 4284.[226]	Yes – applicants[227]
Altop	Specialised AWD systems, window wall systems with integrated punch window components.[228]	Yes – applicants[229]
Ironside construction	All AWD supplied to Class 2 buildings and construction.	Yes – applicants[230]
Empire Windows	Euro slider systems, Empire Windows submit the Australian Industry do not manufacture comparable/substitutable slim-line profiles. These are goods are within Empire Windows 'Euro Slider Series'.[231]	Yes – Vitrocsa Australia[232]
Broad	AWD that is specifically designed, engineered and supplied for installation in buildings classified as Class 2 or above). The exemption is sought where the construction project has a gross floor area exceeding a threshold to be determined by the Commission. Broad proposes that such threshold be set at no less than 2,000 square metres.[233]	Yes – applicants[234]
Jolong	Project specific exemption requests dependent on technical specifications of a construction project.[235]	Intention to contest but not yet contested on the EPR.[236]

SEF 691 table 10: summary of exemption applications received prior to the SEF

Consideration of each depends on the claim that like or directly competitive goods are not offered for sale in Australia for the relevant products or buildings. For the administrative record, Capral opposes each request, and supports the earlier exemption related submissions by the applicants AGWA and Ventora.[19]

Capral expects that further exemption requests may be made in responses to SEF 691. Applications lodged at this late stage cannot be properly tested, including through consultation with the Australian industry, before the final report. Capral submits that they should be considered through the ordinary exemption process after measures are imposed. Considering exemption requests made in SEF responses as part of the final report may also delay the imposition of interim dumping and countervailing duties, prolonging the injury the Commission has found.

6. Aluminium extrusion benchmark and exporters' aluminium costs

Capral supports the use of a benchmark based on the London Metal Exchange (LME) price and the Main Japanese Ports premium, consistent with REP 657.[20] As aluminium is the largest input, the construction of the benchmark affects every normal value in this investigation. Given its experience with the aluminium extrusion measures, Capral requests that the Commission confirm the following:

- Billet premium: the premium is derived from information reported by a single residual exporter, Guangdong Jinxiecheng AL. Manufacturing Co., Ltd, whose costs are formed in the very market the benchmark is intended to replace. The premium should be tested against billet premiums in regional markets not affected by the GOC's influence;[21] and

[19] EPR 691, document no. 454.
[20] SEF 691, Appendix C8, pp. 330–335.
[21] Ibid, Appendix C8.2, p. 332.

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- Conversion amount: the amount is derived from the costs, SG&A and profit of the Chinese exporters examined in REP 657, whose energy and financing costs are affected by the matters in Appendix A, and is a weighted average across finishes. AWD profiles are commonly powder coated, anodised or thermally broken, which add materially to conversion cost. The conversion amount should reflect market-based costs and the finishes used in AWDs;[22] and

- Quarterly application: where an exporter's quarterly purchase prices exceeded the benchmark, the adjustment should not reduce its recorded costs for that quarter.[23]

Consistent assessment of aluminium costs

The Commission compared each exporter's aluminium purchase prices with the benchmark to decide whether its costs were affected, and the outcomes are not consistent:

- Yuanjiang's purchase prices were above the benchmark in aggregate, but its aluminium costs were found to be affected.[24]

- Zhuhai Yipeng Technology Co., Ltd (Zhuhai Yipeng) also purchased above the benchmark in aggregate, with below-benchmark purchases throughout the period, yet its aluminium costs were found to be normal and ordinary.[25]

- SEF 691 also describes Zhuhai Yipeng's costs as both not reflecting competitive market costs and not being affected.[26]

The PMS findings apply to the Chinese aluminium market as a whole. The benchmark comparison measures how each exporter's costs were affected, not whether those conditions existed. Capral requests that Zhuhai Yipeng's aluminium extrusion costs be adjusted to the benchmark, consistently with Yuanjiang.

7. Aluminium subsidy findings

The Commission found that aluminium was provided at less than adequate remuneration only to Guangdong Kete Facadetech Co., Ltd (Kete), being the only selected exporter that reported its supplier, or its supplier's supplier, was a state-owned or state-invested enterprise.[27] Altop's subsidy margin of 1.5 percent is close to the negligible level of 2 percent. Altop's aluminium purchase prices were below the benchmark in aggregate, and Altop was not verified.[28]

Chinese AWD producers source their extrusions from a concentrated Chinese extrusion industry, including the state-invested producers examined in REP 657. Capral requests that the Commission examine whether the extrusions purchased by Altop and the other selected exporters were sourced, directly or indirectly, from those enterprises, and whether any benefit was passed through, as it did for Kete. If Altop's subsidy margin exceeds the negligible level, its exports should be subject to the countervailing duty notice regardless of the outcome of the dumping investigation in respect of Altop.

[22] Ibid, Appendix C8.2, pp. 332–333; Appendix A13.2 and A13.3, pp. 299–302.
[23] Ibid, Appendix C9.2, p. 343; Appendix C10, p. 347.
[24] Ibid, Appendix C9.2, pp. 344–345.
[25] Ibid, Appendix C9.2, pp. 345–346.
[26] Ibid, section 6.9.2, p. 148; Appendix C9.2, p. 346.
[27] SEF 691, Appendix D4.2, pp. 351–352.
[28] Ibid, section 7.6, p. 160; Appendix C9.2, p. 344.

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8. Form of measures and accelerated reviews

SEF 691 proposes that IDD be calculated using the ad valorem method, having regard to two factors: the significant variation in product specifications and prices, and the complex company structures with related parties through which the goods are exported.[29]

Capral agrees on the first point. On complex company structures, the Guidelines on the Application of Forms of Dumping Duty identify the combination method as suited to complex related-party structures where circumvention is likely, and identify the risk under the ad valorem method that exporters lower export prices to avoid the duty.[30] SEF 691 does not explain why the first factor should prevail.

Aluminium extrusion accelerated reviews

Capral participated in the Commission's two most recent accelerated reviews of the measures on aluminium extrusions from China, review no. 700 (REP 700) and review no. 701 (REP 701).[31] In neither review had the exporter exported the goods to Australia in the review period:

- in REP 700, the Commission determined Foshan Nanhai Niuyuan Hardware Product Co., Ltd's export price from exports made after the review period, adjusted for movements in the LME price, and found a dumping margin of negative 6.6 percent;[32]

- in REP 701, there were no exports, quotations or forward orders by Guangdong Guangyuan Aluminum Co., Ltd or its related company. The Commission constructed the export price from Guangyuan's own costs, SG&A and profit, and took it to be equal to the normal value, giving a dumping margin of zero;[33] and

- in both reviews, the exporter moved from the combination method at the rate for all other exporters to a floor price set at its ascertained normal value.[34]

The outcome was that two exporters with no exports during the review period moved from the highest rate of duty to no duty at all, unless they export below a single floor price, with countervailing duty continuing at 1.3 percent for Niuyuan and 0.2 percent for Gungyuan.

Capral's experience is that a floor price based on an exporter's average normal value is not an effective measure where products vary widely in specification and price. A higher-specification product can be priced above the floor, while still below its own normal value, and attract no duty. SEF 691 itself recognises that an ascertained floor may not be meaningful where models show significant price variation.[35]

Relevance for AWDs

Capral submits that these risks are greater for AWDs than for extrusions. AWDs are supplied project by project, through quotations and tenders, so an exporter may have no exports in a 12-month review period while actively quoting on Australian projects.

The gap between the combined rate of 73.3 percent for uncooperative and all other exporters and the result of a review without exports gives a clear incentive to establish new exporting entities, in a supply chain SEF 691 has found

[29] Ibid, sections 12.2 and 12.2.5, pp. 212–214; section 12.4, p. 215.
[30] Ibid, section 12.2.5, pp. 213–214.
[31] REP 700, EPR 700, document no. 5; REP 701, EPR 701, document no. 7.
[32] REP 700, section 1.4, Table 1, p. 5; section 3.2, pp. 13–14.
[33] REP 701, section 3.2, pp. 17–18; section 5, p. 25.
[34] REP 700, section 8, p. 27; REP 701, section 8, p. 32.
[35] SEF 691, section 12.2.5, p. 213.

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to involve complex related-party structures. Interim duty is not collected while an accelerated review is conducted, although securities may be taken.[36]

Circumvention risk

Capral's experience of the aluminium extrusion measures is that measures of this kind attract circumvention activity, and Capral is concerned that the AWD measures will be exposed in the same way. In particular:

[*confidential text deleted: assessment and implications of possible types of circumvention activity*]

Each of these can only be dealt with through an anti-circumvention inquiry once the measures are in place, by which time the injury has continued.

Capral also expects the number of accelerated review applications to be high. SEF 691 identifies some 120 residual exporters,[37] and many more Chinese AWD producers and façade suppliers are able to quote for Australian projects without having exported during the investigation period. Given the project-based nature of supply, and the gap between the rate for all other exporters and the outcome of a review without exports, Capral expects that a significant number of new exporting entities will seek accelerated reviews soon after the measures are imposed.

The form of measures should be chosen with these risks in mind. A single ad valorem rate applied to the declared export price is the most exposed to each of them, and gives the Commission no reference point against which a large number of accelerated reviews can be determined consistently within 100 days. Ascertained export prices, set by category of goods, provide that reference point, both for the Australian Border Force at the border and for the Commission in assessing a new exporter's prices.

Capral's position

Capral therefore submits that the combination method is the more appropriate form of IDD for AWDs, because:

- its variable element addresses related-party structures and the risk of exporters lowering prices to avoid the duty;
- its fixed element may take the form of an ad valorem rate on the ascertained export price, retaining the simplicity of the ad valorem method;[38]
- it is the form the Commission already applies to aluminium extrusions from China, the principal input to AWDs, which also cover many profiles, alloys and finishes at varying prices;[39] and
- it would give an accelerated review a framework against which a new exporter's prices can be tested within the 100 days available.[40]

If the ad valorem method is maintained, Capral requests that the final report set out how the measures would operate in an accelerated review where the exporter has not exported in the review period, including that:

- the export price should be based on the exporter's current quotations and tender prices for Australian projects, or on exports after the review period as in REP 700, and should not be taken to be equal to the normal value by construction, as in REP 701;[41]

[36] Ibid, section 12.4, Table 29, p. 215; *Customs Act 1901*, sections 269ZE and 269ZH.
[37] SEF 691, section 1.2.13, p. 20; section 2.4.3, Table 6, pp. 30–36.
[38] SEF 691, section 12.2.4, p. 213.
[39] REP 700, section 2.3, Table 4, p. 10.
[40] Ibid, section 2.2, p. 9.
[41] REP 701, section 3.2, p. 18.

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- the normal value should apply the same PMS findings and glass and aluminium benchmarks as this investigation, as the Commission did by reference to REP 657 in REP 700 and REP 701;[42] and

- a new exporter should not be placed in a better position than the cooperative exporters found to have dumped at margins of between 5.3 and 51.6 percent, unless its own export prices demonstrate otherwise.

9. Conclusion

Capral supports the findings in SEF 691 and the publication of dumping and countervailing duty notices on AWDs exported to Australia from China. Capral submits that the final report should:

- maintain the findings on window wall and on the Australian industry's supply across Class 1 to Class 9 buildings, and reject the six exemption requests;

- confirm the aluminium extrusion benchmark matters identified, and adjust Zhuhai Yipeng's aluminium costs consistently with the other selected exporters;

- examine the pass-through of aluminium subsidies to Altop and the other selected exporters;

- assess circumvention risks; and

- adopt the combination method for IDD or, if the ad valorem method is maintained, set out how the measures will operate in an accelerated review, having regard to the circumvention risks identified and the expected number of accelerated reviews, so that the outcome is consistent with this investigation and that injury remains addressed.

Yours sincerely,

[redacted]

[42] REP 700, section 4.3, pp. 18–19; REP 701, section 2.6.2, Table 5, p. 15.