Susan Danks Tariff Consulting Pty Ltd
ABN 87 167 804 622
PO Box 3, Sutherland NSW 1499
Office 02 9528 2228 | Mobile 0407 128 378
susan.danks@tariffconsulting.com.au

PUBLIC RECORD

3 November 2026

Investigations 1
Australian Trade Remedies Commission
By email: Investigations1@atrc.gov.au

Dear Commissioner,

Investigation 691: Aluminium windows and doors exported from the People's Republic of China
Submission in response to Statement of Essential Facts 691: aluminium skylights are outside the goods under consideration

Susan Danks Tariff Consulting Pty Ltd acts for Foshan Watte Intelligent Doors and Windows Co. Ltd (佛山瓦特智能门窗有限公司, Unified Social Credit Code 91440605MA53YEXH1N) ("Watte") and lodges this submission on its behalf. In this submission, "we" and "our" refer to Watte. Watte's written instruction for Susan Danks Tariff Consulting Pty Ltd to act for it is at Attachment E.

1. Summary

We manufacture aluminium skylights, including those imported into Australia by Luminor Pty Ltd ("Luminor"). We support Luminor's submission in response to Statement of Essential Facts 691 ("SEF 691") and ask the Commission to:

a. state expressly in its final report that aluminium-framed skylights, roof windows, rooflights and roof access hatches are not within the goods under consideration ("the goods"); or

b. in the alternative, amend the goods description to add the exclusion proposed in section 8 of Luminor's submission:

"Skylights, roof windows, rooflights and roof access hatches, being glazed units designed for installation in a roof plane, whether fixed, manually operable or motorised."

Please treat this letter as a submission in response to SEF 691 under s.269TEA(3)(a)(iv) of the Customs Act 1901. This letter is non-confidential and may be placed on the public record. Attachments B, C1, C2, D and E are confidential. Non-confidential versions of Attachments B, C1, C2 and D are attached for the public record.

2. Who we are

Watte is a manufacturer established in 2019, with its factory in Shishan Town, Nanhai District, Foshan, Guangdong Province. We design and make electric and fixed skylights, retractable sunroom systems and lifting (vertical sliding) windows. Our skylight range is at Attachment A.

Our name appears on some documents as "Foshan Watt" or "Foshan Watt Intelligent Door & Window Co., Ltd". These are the same company, identified by the Chinese name and credit code above. We were not examined in the investigation and are not a selected or residual exporter in SEF 691.

This submission concerns our skylights only. Our lifting windows are a separate matter and are not the subject of this submission.

3. Our skylights are designed and made as roof elements

Our detail drawings for the WT-DR56-F fixed skylight and the WT-DR56 electric operable skylight are at Attachment B (confidential, with a public summary). They show that:

- each skylight sits on a timber base frame built over the opening in the roof and is fixed to the roof battens with metal pull tabs;
- the base frame is weatherproofed as part of the roof, with fibre cement cladding, an exterior UV-stable membrane and metal flashing fixed with sealed roofing screws; and
- the glazing is designed for overhead use: a double-glazed unit with a 6 mm low-E outer pane, a 20 mm argon-filled cavity and a laminated inner pane (5 mm + 1.14 mm interlayer + 5 mm).

None of these components is used to install a window in a wall. Our catalogue (Attachment A) shows the same approach across our range of top-hung, sliding, rising and custom-shaped skylights, all for installation in flat or pitched roofs.

4. Our skylights are tested as rooflights

Ian Bennie & Associates Pty Ltd, a laboratory accredited by the National Association of Testing Authorities (Accredited Laboratory No. 2371), has tested two of our skylights to AS 4285-2019 Rooflights. In each test the sample was mounted on a fibre cement sheeted timber frame simulating installation in a roof, and flashed to the skylight frame.

- *WT-DR56-F fixed skylight, 1600 × 1600 mm*: Test Report 2025-078-S2-R2, revision 2, issued 21 July 2026 (Attachment C1). It passed watertightness at roof pitches from 0° to 27°, resistance to concentrated loads (design action 1.1 kN), and resistance to wind pressures for both non-cyclone and cyclone regions. The cyclone results were added in revision 1, using cyclic fatigue data from testing of an identical sample by another NATA-accredited laboratory. Revision 2 replaces revision 0 (Test Report 2025-078-S2, issued 19 March 2026), which Luminor lodged as Attachment B1 to its submission.
- *WT-DR56 electric operable skylight, 1600 × 1600 mm*: Test Report 2025-078-S1, revision 0, issued 19 March 2026 (Attachment C2). It passed watertightness at roof pitches from 0° to 27°, resistance to concentrated loads and resistance to wind pressures for non-cyclone regions, at the ratings stated in the report. It was not tested for cyclone regions.

Each report states that its results apply to the sample as tested. AS 4285-2019 is the Australian Standard for rooflights. The Australian Standard for windows, AS 2047, does not cover skylights (see section 6 of Luminor's submission).

5. How we make our skylights

An independent on-site audit of our factory by SGS-CSTC Standards Technical Services Co., Ltd (Audit Report QIP-ASI261852, 21 July 2026) is at Attachment D (confidential, with a public summary). It confirms our registration and premises, our own production workflow of cutting, CNC machining, drilling, welding, polishing, assembly and packing, and our ISO 9001:2015 quality certification. We hold utility model patents for our own skylight designs, including sliding, horizontal lifting and overlapping skylight structures.

6. Our request

We support the requests in section 8 of Luminor's submission, including its alternative request for an exemption for skylights under s.8(7) of the Customs Tariff (Anti-Dumping) Act 1975. Our priority is the exclusion of skylights from the goods.

7. Conclusion

Skylights were not examined in this investigation. They are designed, tested and installed as roof elements, and they should not be caught by it.

We would be happy to provide further technical information about our skylights. Please direct any questions about this submission to me.

Yours faithfully,



Susan Danks
Principal and Director | Licensed Customs Broker
Susan Danks Tariff Consulting Pty Ltd
On behalf of Foshan Watte Intelligent Doors and Windows Co. Ltd

Attachments

A. Watte Skylight Systems product catalogue
B. Detail drawings: WT-DR56-F fixed skylight and WT-DR56 electric operable skylight (CONFIDENTIAL). A non-confidential summary is attached for the public record.
C. C1. Ian Bennie & Associates Test Report 2025-078-S2-R2 (WT-DR56-F, fixed), revision 2 (CONFIDENTIAL). A non-confidential version is attached for the public record.
C2. Ian Bennie & Associates Test Report 2025-078-S1 (WT-DR56, operable) (CONFIDENTIAL). A non-confidential version is attached for the public record.
D. SGS-CSTC Audit Report QIP-ASI261852, 21 July 2026 (CONFIDENTIAL). A non-confidential summary is attached for the public record.
E. Watte's written instruction to Susan Danks Tariff Consulting Pty Ltd to act for it, 2 November 2026 (CONFIDENTIAL)