Letter to the Commissioner – exemption request and SEF submission

NON-CONFIDENTIAL VERSION – FOR THE PUBLIC RECORD. Commercially sensitive information has been removed and is marked [REDACTED – commercial-in-confidence].

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3 November 2026

The Commissioner
Australian Trade Remedies Commission
By email: Investigations1@atrc.gov.au

A confidential version of this submission has been provided to the Commission.

Dear Commissioner,

Request for exemption under subsections 8(7) and 10(8) of the Customs Tariff (Anti-Dumping) Act 1975 – Investigation 691, Aluminium Windows and Doors exported from China – GI Modular Face-Fixed Window System

1. Our request

GI Procurement asks that its modular face-fixed window system be exempted from dumping and countervailing duties under Investigation 691. Without an exemption, the 73.3% rate will make a product we have spent 4 years and significant investment developing for Australian conditions uncompetitive.

We make this request and submission on SEF 691 as an importer and interested party. We ask that it be considered in the final report alongside the other product-specific requests in Table 10 of the SEF, including Empire Windows and Jolong, as section 3.7 of the SEF provides, and that the Commissioner recommend to the Minister that the goods below be exempted. If that is not possible within the investigation, we ask for a separate exemption inquiry, as section 1.2.5 contemplates.

Goods proposed for exemption: face-fixed aluminium sliding windows, up to 1,200 mm high and 1,210 mm wide, designed for installation in transportable modular buildings, supplied with an integrated external aluminium trim and an aluminium internal reveal system for a 92 mm wall, and tested to AS 2047.

Models:

Product code	Description
GI-WIN-9001208-C2-5	900mmH x 1208mmW Face Fixed XO Sliding 5mm Grey Float Glass Window; Black Frame. Includes Fly Screen (Packed Separately)
GI-WIN-1200908-C2-5	1200mmH x 908mmW Face Fixed XO Sliding 5mm Grey Float Glass Window; Black Frame. Includes Fly Screen (Packed Separately)
GI-WIN-350750-C2-4	350mmH x 750mmW Face Fixed XO Sliding 4mm Obscure Glass Window w/ PVO; Black Frame. Includes Fly Screen (Packed Separately)
GI-WIN-3501208-C2-4	350mmH x 1208mmW Face Fixed XO Sliding 4mm Obscure Glass Window w/ PVO; Black Frame. Includes Fly Screen (Packed Separately)
GI-WIN-9001208-C2-6.38	900mmH x 1208mmW Face Fixed XO Sliding 6.38mm Grey Laminate Glass Window; Black Frame. Includes Fly Screen

Product code	Description
	(Packed Separately)
GI-WIN-1200908-C2-6.38	1200mmH x 908mmW Face Fixed XO Sliding 6.38mm Grey Laminate Glass Window; Black Frame. Includes Fly Screen (Packed Separately)
GI-WIN-12001208-C2-6.38	1200mmH x 1208mmW Face Fixed XO Sliding 6.38mm Grey Laminate Glass Window; Black Frame. Includes Fly Screen (Packed Separately)
GI-WIN-350750-C2-6.38	350mmH x 750mmW Face Fixed XO Sliding 6.38mm Frosted Laminate Obscure Glass Window; Black Frame. Includes Fly Screen (Packed Separately)

2. About GI Procurement and our window system

GI Procurement is a small Brisbane business employing 15 staff. We supply fit-out packages for modular and remote workforce accommodation – windows, joinery, furniture and FF&E – to commercial customers only. All our windows go to one client, ATCO Structures & Logistics, as one part of a larger fit-out package for modular buildings built at ATCO's main factory at Luscombe and its secondary factory at Rocklea, South East Queensland. We supply both factories.

A system designed for modular buildings. Since 2022 we have designed a face-fixed aluminium sliding window system for factory-built modules that are transported by road to remote and regional sites. These are not general-purpose residential windows. The system includes components we developed:

- **External aluminium window trim**, unique to our frame, for a fast, sealed face-fixed installation on the module production line
- **Aluminium internal reveal system** (92 mm wall) with PVC corner joiners, replacing site-built timber reveals
- **Internal blackout blind system** designed to fit our frame and reveal, for shift workers in workforce accommodation
- **Fly screens and pallet packing** matched to modular factory workflows (28–70 windows per pallet, full 40HQ containers)

Independently tested to AS 2047. Every model has been tested by Intertek to Australian Standard AS 2047:

Model	Intertek report	Date	Wind (serviceability)	Water penetration	Use
GI-WIN-1212 (C2)	230519206GZC-001	25 June 2023	800 Pa – C2	200 Pa – C2	Original C2 range
GI-WIN1212-C2-450	250915235GZC-001	14 November 2025	800 Pa – N4/C2	**450 Pa – N6/C4**	Current C2 range: QLD, NSW, VIC, SA
GI-WIN-1212-C4	250321227GZC-001	18 December 2025	1,600 Pa – N6/C4	**450 Pa – N6/C4**	New C4 range for WA cyclonic regions

Our current C2 window passes water penetration at the Category 4 (cyclonic) level of 450 Pa, well above what a C2 window requires, to provide a superior product to others available on the market. Our new C4 window, certified in December 2025, is ready for projects in Western Australia. Tooling, testing and AGWA membership costs are set out in a confidential appendix.

Our supply chain. The windows are made to our designs by Foshan Hanhui Door & Window Technology Co., Ltd, a small factory in Foshan, Guangdong (registered 2018). They are exported to us through our sourcing partner, Guangzhou Liufeng Trading Co., Ltd. Hanhui has confirmed in a signed declaration dated 2 November 2026 (Attachment E) that:

- the tooling and moulds for our profiles, trims and reveal corners were made for and paid for by GI Procurement, are owned by GI Procurement, and are used only to make products for us;

- the designs, drawings, profile shapes and specifications of the system belong to GI Procurement, and Hanhui makes no products from them for anyone else;
- Hanhui has not sold aluminium windows or doors to any other customer in Australia, directly or through any trader or agent, and has no other Australian customers; and
- Hanhui sells the system to Liufeng, which exports it to GI Procurement, and does not export it to Australia in its own name.

A single, dedicated source. GI Procurement has never bought aluminium windows from any Australian manufacturer or from any other supplier. Every window we have supplied has been made by Hanhui, the factory with which we developed the system. Our imports have therefore not replaced purchases from the Australian industry: the GI system has always come from one dedicated supply chain.

Design, engineering, certification, project management and after-sales support are done by our team in Brisbane.

3. Why these goods qualify for exemption

We ask for the exemption under paragraph 8(7)(a), and the matching provision in subsection 10(8), because like or directly competitive goods are not offered for sale in Australia to all purchasers on equal terms under like conditions.

1. **No equivalent local system.** We are not aware of any Australian manufacturer offering a face-fixed window with a matching external trim, aluminium internal reveal and blind system, tested together for modular use.
2. **Not offered on like conditions.** Modular builders need pallet-packed, volume supply on fixed lead times to keep production lines moving and to meet transport schedules to remote sites. To meet these lead times we pre-order windows from the factory and hold stock in our Brisbane warehouse ahead of ATCO's purchase orders.
3. **Higher performance for the same use.** Our C2 window passes water penetration at the C4 level (450 Pa).
4. **A small, specialised niche.** We sell only commercially, through one client, as part of a full fit-out package. Our volumes are modest. ATCO QLD first ordered our windows in April 2025; to 28 October 2026 it has ordered 8,644 windows (5,760 delivered, 2,884 on order) [REDACTED – commercial-in-confidence]. Hanhui's sales of these goods for export to Australia during the investigation period (1 July 2024 – 30 June 2025) totalled 4,984 windows [REDACTED – commercial-in-confidence], all supplied to GI Procurement through Liufeng (Attachment E). We do not sell to builders, retailers or the public. We have never sourced aluminium windows from Australian or other suppliers; the GI system has only ever been made by Hanhui.

The Commission did not examine our supplier, so the 73.3% rate applied to it is the default for "uncooperative and all other exporters" (SEF section 6.12), not a rate based on its prices. Hanhui has confirmed in writing that it is willing to answer the Commission's questions (contact details provided in the confidential version). We ask that our product be judged on what it is.

4. Impact of a 73.3% duty

The duty applies to the customs value of each window. Using our most recent shipment of the two windows most used in accommodation buildings, it turns the product from profitable to loss-making:

[REDACTED – commercial-in-confidence] Table of landed cost, selling price and gross margin per window, with and without the 73.3% duty.

Figures are from our two most recent shipments (AT18616, July 2026, and AT280, August 2026), which entered before securities applied.

The duty alone is far larger than our gross margin on these windows [REDACTED – commercial-in-confidence]. We cannot absorb it, and passing it on would put our price far above what ATCO can pay.

The duty is already hitting live orders. Our next container (invoice AT644, COSCO FELIXSTOWE 206S, shipped 22 October 2026) carries 644 windows for a 280-room ATCO accommodation project (70 four-person modules). On these windows the interim security payable on entry [REDACTED – commercial-in-confidence] turns the expected margin into a loss on every window. The container also carries a small number of spare windows, which we hold as stock.

The consequences:

- **For GI Procurement:** windows are [REDACTED – commercial-in-confidence] of our revenue. Losing them puts the rest of the ATCO fit-out package at risk, along with Australian jobs.
- **For ATCO and its clients:** ATCO builds modular buildings for government, education, mining and other projects. Higher window costs pass straight into those projects.
- **For our investment:** our C4 window for WA was only certified in December 2025. At 73.3% it will not reach the market. We also hold [REDACTED – commercial-in-confidence] of aluminium profile and cut glass at the factory, made to our sizes and paid for, which would be stranded.

5. What we ask

We respectfully ask the Commissioner to:

1. Assess this request in the final report due on 16 December 2026 and recommend to the Minister that the goods described in section 1 be exempted, under subsections 8(7) and 10(8), from any dumping duty and countervailing duty notice made under Investigation 691.
2. If that is not possible, conduct an exemption inquiry as soon as possible after the final report.

We support the aim of protecting Australian manufacturing. We are a small Queensland business that has invested in a product designed for a specialised Australian market, and we would welcome the chance to meet the case team, show the system and answer questions.

Yours sincerely,

Andrew Humble
Director
Grand International Procurement Pty Ltd (GI Procurement)

Attachments

No.	Document	Status
A	Intertek test reports 230519206GZC-001, 250915235GZC-001, 250321227GZC-001	Have
B	Product drawings and specifications: windows, aluminium internal trim and blackout blinds	Have
C	Appendix workbook – confidential, not for publication	Provided
D	Business licence of Foshan Hanhui Door & Window Technology Co., Ltd	Have
E	Hanhui declaration on tooling, IP and Australian customers, signed and sealed 2 November 2026	Have
F	ATCO letter of support	To follow