SUBMISSION IN RESPONSE TO STATEMENT OF ESSENTIAL FACTS 691

Aluminium windows and doors exported from the People's Republic of China

NON-CONFIDENTIAL VERSION – FOR PUBLIC RECORD

TO	The Commissioner, Trade Remedies Commission
LODGED	By email to Investigations1@atrc.gov.au
INVESTIGATION	691 – Aluminium windows and doors exported from the People's Republic of China
RESPONDING TO	Statement of Essential Facts 691 (14 October 2026), sections 3.8, 4.6.1 and 4.7 – window wall
SUBMITTED BY	Bastion Residential Built Pty Ltd (ABN 61 681 056 593) – Level 1, 34–36 Thomas Drive, Surfers Paradise QLD 4217
CONTACT	Tom Carrington, Contract Administrator – tc@bastion.group – 07 5690 1611
INTEREST	Head contractor and end user of a unitised aluminium window wall system supplied from China for a 30-storey Class 2 residential tower
DATE	3 November 2026

1. SUMMARY

Bastion asks the Commissioner to find that unitised window wall systems supplied for multi-storey Class 2 to 9 buildings are outside the goods, or alternatively to clarify how the goods description applies to them.

The preliminary findings at sections 3.8.1 and 4.6.1 treat window wall as a type of aluminium window, and section 4.6.1 finds it is not a separate market segment. In practice, a unitised window wall is procured, engineered, tested and certified as a single façade system, and on NERA it also carries the external aluminium screens, which are fixed to its mullions. Applying a window-by-window description to it produces arbitrary results, as the NERA project shows (section 4).

Bastion requests, in order of preference, that:

(a) unitised window wall systems supplied for multi-storey Class 2 to 9 buildings are found to be outside the goods, or treated as curtain wall under the existing exclusion;

(b) if window wall remains in scope, the final report confirms how the dimensional limits apply to unitised modules, consistent with footnote 316 of the SEF; and

(c) the final report reconsiders the findings at sections 4.6.1 and 4.7 on window wall as a market segment and on the Australian industry's capability to supply it, having regard to the evidence at section 5.

2. BACKGROUND

Bastion is the head contractor for NERA Residences, a 30-storey Class 2 residential tower at 8–10 Parneno Street, Chevron Island, Queensland.

- The building envelope is a unitised aluminium window wall system of about 8,000 m², manufactured in China.
- The system is supplied as factory-assembled modules installed slab to slab, with integrated spandrel panels and back pans. Corner posts, cover plates and water stop angles are supplied as part of the same system.
- The external aluminium screens are fixed to the window wall, bolted back to the window wall mullions (Attachment A, FC-SD-4007). The supplier manufactures the window wall modules, screens and glazed balustrades as one façade system.
- It is designed and certified as a façade: project-specific shop drawings, Form 15 engineering certification, structural and thermal calculations, weatherproofing verification and a visual mock-up. Prototype testing of the system to AS/NZS 4284 is included in the supply contract.
- The window wall was procured as a façade package, separate from the building's other windows and doors. The window wall and screens are installed together by the same Queensland façade installer.

Bastion is responsible for the façade under a fixed-price head contract.

3. GROUND 1 – UNITISED WINDOW WALL IS A FAÇADE SYSTEM, NOT A WINDOW ASSEMBLY

The goods description is framed around window and door assemblies and their frames, panels and sashes. A unitised window wall module is a different product.

The imported unit is a façade module. The approved shop drawings (Attachment A) show 151.6 mm deep aluminium frames coupled by male and female split mullions, with a 3.0 mm aluminium back pan, 75 mm rock wool insulation and 1.5 mm galvanised sheet built into the frame at spandrel zones, fixed slab to slab through sub-head and sub-sill receptors anchored into the structure. The awning sashes and sliding door panels are components within that system. The module is not itself a window frame, panel or sash within the ordinary meaning of the description.

The window wall also supports the external screens. On NERA the aluminium screens are bolted back to the window wall mullions through aluminium angles and flat bars (Attachment A, FC-SD-4007). The supplier manufactures the modules and screens as one façade system, and the same façade installer installs them together. The window wall is the supporting frame for the screens as well as the building envelope. That is the function of a façade system, not of a window assembly.

The SEF accepts the overlap with curtain wall. At page 92 the Commission accepts that window wall and curtain wall share aluminium framing and glazing, form the building envelope, meet project-specific structural and weather performance requirements, are supplied to the same developments and may be alternative façade systems. Those are the characteristics that define the product to a purchaser.

The distinction relied on is installation, which the SEF otherwise treats as irrelevant. Section 4.6.1 distinguishes window wall from curtain wall mainly by how it is supported by the structure and whether it extends past the slab edge (pages 92–93). The same section finds that differences in installation do not change whether a product is within the goods (page 91). Bastion submits the same reasoning should apply both ways: if installation does not take window wall out of the goods, it should not be the basis for keeping it out of the curtain wall exclusion.

"Curtain wall products" is not defined. The exclusion does not say what curtain wall includes, and the initiation notice does not refer to window wall. Bastion submits the exclusion is best read as removing engineered façade systems from an investigation directed at conventional windows and doors.

The SEF's own definition describes window wall as a façade system. At page 89, drawing on AS 2047, AS/NZS 4284 and the Façade Industry Association's Technical Guidance on Window Wall Systems (footnote 301), the Commission describes a window wall system as "a façade system comprising interconnected window, framing and spandrel components installed between structural floor slabs to form part of a building's external envelope". That describes the NERA system. It is a façade system first, and the window elements are one component of it.

The applicants' own application groups window wall with curtain wall. As noted in the submission of Customs and Global Trade Law (EPR document 409), page 79 of the application acknowledges that large curtain wall and window wall systems differ from smaller windows and doors.

4. GROUND 2 – THE DIMENSIONAL LIMITS GIVE ARBITRARY RESULTS FOR ONE FAÇADE

On NERA, one window wall system of the same specification, from the same supplier, would be partly in and partly out of the goods depending only on floor-to-floor height.

Footnote 316 of the SEF (page 91) confirms that window wall is only within the goods where it meets the height and width limits. Applied to the project's architectural window schedules (Attachment B):

LOCATION	OPENING HEIGHT (MM)	FRAME HEIGHT (MM)	WITHIN 3.0 M
Levels 2–25 (typical floors)	2,820	2,744	Yes
Levels 26–28	3,040	approx. 3,005	No
Level 29 and pool level	3,150	over 3,000	No

Level 29 (types AK, BJ, BK)	3,960	over 3,000	No
Level 30 amenities	3,310	over 3,000	No
Level 1 lobby	5,400	n/a	No

The opening heights are from the window schedules. The typical floor frame height is from the approved Level 2–16 shop drawings, where the 2,820 mm opening is made up of a 2,744 mm frame plus the 25 mm sub-head and 51 mm sub-sill zones. On Levels 26 and above the frames themselves are over 3.0 m. The sub-head and sub-sill receptors are imported with the system and add to the height of every module.

The façade is designed, engineered, tested and warranted as one system. A test that splits it by storey height shows the goods description was not drafted with unitised façade systems in mind.

If window wall stays in scope, the final report needs to say how the limits apply to unitised systems, including:

- whether the measure is each module as imported, or the coupled run of modules forming one opening;
- whether sub-head and sub-sill receptors supplied with the system are included in the height;
- how modules coupled on site by split mullions are treated; and
- how spandrel-only modules, corner posts and cover plates supplied with the system are treated.

Without this, importers and the Australian Border Force will classify the same product differently from entry to entry.

Valuing the goods at entry. The limits also leave no practical way to value the goods in a shipment. On NERA:

- the window wall is supplied under one contract for a lump sum, paid against supply milestones, with no contract price for each module;
- shipments are packed to the installation sequence, so one shipment can hold modules from floors below and above Level 26, together with sub-heads, sub-sills, corner posts, cover plates and fixings for those floors;
- modules inside and outside the limits are made from the same extrusions, glass and spandrel components, so there is no cost basis to separate them; and
- whether receptors, corner posts, cover plates and spandrel-only modules form part of the goods is not settled (see above).

To calculate duty on a shipment, the importer would first have to decide which items are within the goods, then allocate part of a lump sum price to them. Neither step has a basis in the goods description or the SEF. The duty payable would depend on the allocation method chosen rather than the goods, and could differ between entries for the same system.

5. GROUND 3 – WINDOW WALL IS A DISTINCT MARKET THE INDUSTRY DID NOT SUPPLY

Section 4.6.1 finds that window wall is not a separate market segment, and section 4.7 finds the Australian industry supplies all segments. Both findings rest on supply of aluminium windows and doors generally. Bastion's experience on NERA does not support them for unitised window wall.

A unitised façade package for a 30-storey tower requires:

- project-specific façade engineering, Form 15 certification and façade performance testing;
- factory production of about 8,000 m² of modules to keep pace with the structure, which under the current programme rises about one floor every 9 to 10 days from October 2026 to May 2027;
- integrated spandrel, insulation and back pan elements within each module; and
- supply and installation coordinated as one façade package, including the external screens fixed to the window wall.

Australian suppliers. Window Makers (Gill & Andrews Pty Ltd), an Australian window manufacturer approached by Bastion, has confirmed in writing that it does not have the production capacity to supply the NERA package within the project programme (Attachment C).

Australian tender. Bastion also received a tender for the window package from an established Australian window and façade manufacturer [CONFIDENTIAL TEXT DELETED – name of tenderer and quote reference]. It could not

be accepted for NERA:

- the tenderer stated that it was not a fully conforming tender;
- it excluded the aluminium screens and glazed balustrades. On NERA these are part of the same façade package as the window wall. The screens are fixed to the window wall mullions (Attachment A, FC-SD-4007) and the opening sashes are set out to clear them (Attachment B, A5.102). Separate suppliers would split design and warranty responsibility for one façade;
- its warranty would be void if third party systems such as sunshades or feature fins were mechanically fixed to its system without adequate provision at the fixing points and its written consent. Screens supplied by others and fixed to the tenderer's framing would have put the window wall warranty at risk;
- the price was subject to rise and fall for labour, aluminium, glass, hardware and freight over the following 12 to 24 months, and to adjustment for exchange rate movements. Bastion carries the façade under a fixed-price head contract and cannot accept an open-ended price;
- it excluded prototype testing, proposing that previous test reports on similar designs be accepted instead. It also excluded a visual mock-up, site water testing and whole-of-system thermal analysis;
- the double glazed units were to be imported from China; and
- it offered the tenderer's proprietary framing suites with modifications to the design intent, with programme and manufacturing capacity to be confirmed at acceptance.

Screens with the window wall. Bastion did not receive an offer from any Australian supplier to supply and install the screens together with the window wall. The tenderer excluded the screens, and Window Makers could not offer the package within the programme.

Bastion's contracts for the imported system are fixed lump sums with one supplier for the window wall and for the screens and balustrades, including prototype testing. The supplier manufactures them as one façade system, and the window wall and screens are installed together by the same façade installer. The tender is provided to the Commission at Attachment D of the confidential version of this submission.

An offer on those terms was not an offer of the product Bastion needed. Bastion submits it goes to whether the Australian industry supplies unitised window wall for high-rise buildings, and to whether like goods were offered for sale in Australia on equal terms (section 7).

Bastion asks that the final report make a specific finding on whether the Australian industry produces and supplies unitised window wall systems for high-rise buildings, and whether imports of those systems have caused injury to it.

6. RESPONSE TO THE APPLICANTS' SUBMISSIONS

The applicants' position is summarised at pages 80–81 of the SEF. Bastion responds as follows.

"Window wall meets the goods description and dimensional parameters." Many NERA modules do not (section 4). The applicants' own test produces a split result within a single façade.

"Aluminium-framed window assemblies remain windows however they are incorporated." A unitised module is not only a window assembly. It includes spandrel, insulation and back pan elements that are not window components, and on NERA it is the supporting frame for the external screens (section 3).

"Aluminium and glass are the principal materials." The same is true of curtain wall, which is excluded. Shared materials cannot be the test that separates them.

"Engineering, testing and high-rise application are only differences in specification." For unitised window wall they are the product. The system is engineered, tested and certified as a façade, not selected from a range of standard windows (sections 2 and 3).

"Scale, project type and procurement go to market segmentation and injury, not scope." If that is accepted, the market segmentation and injury findings must deal with window wall on its own facts. Section 4.6.1 does not do so, and section 5 sets out evidence that the Australian industry did not supply it.

"The curtain wall exclusion does not establish that window wall is excluded." The exclusion is undefined. The SEF itself accepts the close overlap between the two (page 92).

7. REQUESTED OUTCOME

Bastion asks the Commissioner, in the final report to the Minister, to:

(a) find that unitised window wall systems supplied for multi-storey Class 2 to 9 buildings are outside the goods, or are curtain wall products for the purposes of the exclusion;

(b) alternatively, confirm how the height and width limits apply to unitised window wall, covering the points listed in section 4, and how the export price is to be determined where a shipment contains goods both inside and outside the limits; and

(c) reconsider the findings at sections 4.6.1 and 4.7 for unitised window wall, and take the evidence at section 5 into account in the injury and causation assessment.

If unitised window wall is not excluded, Bastion reserves its right to apply for an exemption from any measures imposed, on the basis that like or directly competitive goods were not offered for sale in Australia for this project. The evidence at section 5 and Attachment C goes to that question.

Bastion is available to provide further information.

8. ATTACHMENTS

ATT.	DOCUMENT	STATUS
A	Synova approved shop drawings (Levels 2–16), SY0201 FC-SD-4001 and FC-SD-4007 horizontal details and FC-SD-5002 vertical details	Attached
B	Architectural window schedules A5.102 and A5.105, with summary of heights from A5.101–A5.107 (relied on in section 4)	Attached
C	Letter from Window Makers (Gill & Andrews Pty Ltd), 27 October 2026, on capacity to supply the NERA package within the programme	Attached
D	Tender from an Australian window and façade manufacturer, January 2026	Confidential – provided in the confidential version only

This is the non-confidential version of Bastion's submission for the public record. Confidential information (the identity of the Australian tenderer, and its tender at Attachment D) has been removed where marked. A confidential version has been provided to the Commission.

For and on behalf of Bastion Residential Built Pty Ltd

Tom Carrington

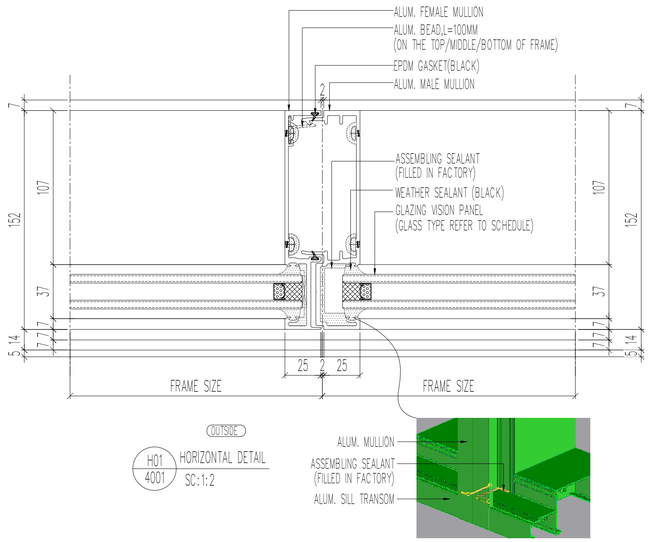
Tom Carrington
Contract Administrator
3 November 2026

ATTACHMENT A – SYNOVA APPROVED SHOP DRAWINGS (EXTRACT)

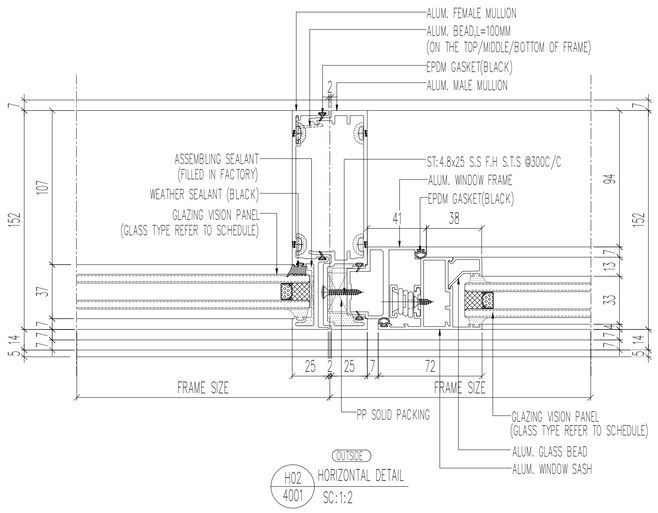
Extract from the approved aluminium window wall shop drawings for NERA, Levels 2 to 16, prepared for Bastion by Synova Facade Limited (project SY0201, issued for construction). The three sheets listed follow this page.

DRAWING	TITLE	REV	DATE
FC-SD-4001	Horizontal details (mullions, frame joints, spandrel zones)	A	03.07.26
FC-SD-4007	Horizontal details (screen connections to window wall mullions)	D	07.09.26
FC-SD-5002	Vertical details (sub-head, sub-sill, slab fixing, spandrel)	D	07.09.26

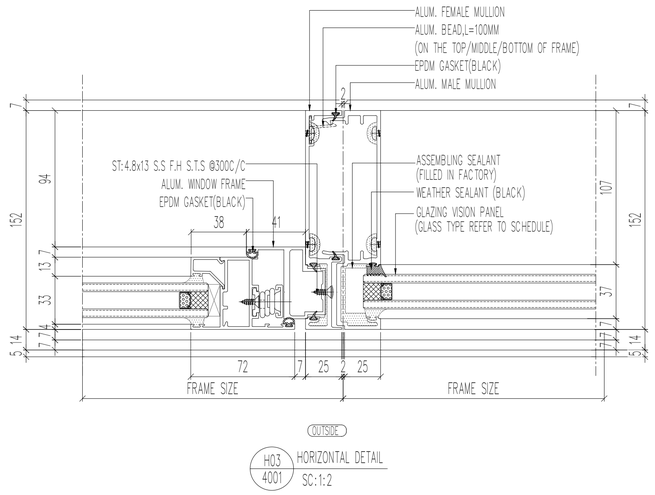
The details show the frames coupled by male and female split mullions, the 3.0 mm aluminium back pan, 75 mm rock wool insulation and 1.5 mm galvanised sheet within the frame at spandrel zones, the sub-head and sub-sill receptors anchored into the slab above and below, and the external screens bolted back to the window wall mullions through aluminium angles and flat bars (FC-SD-4007). Relied on in sections 2, 3 and 5.



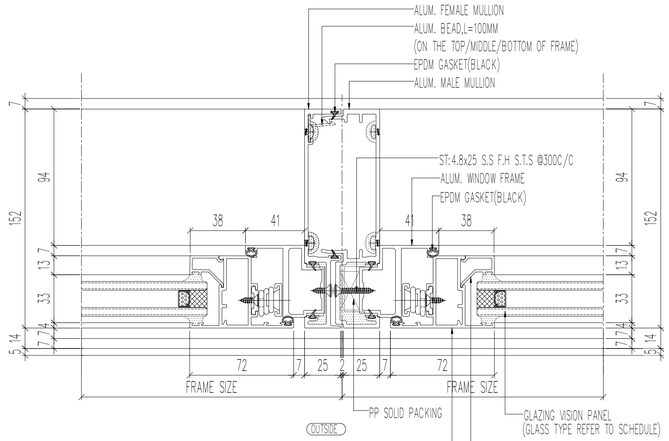
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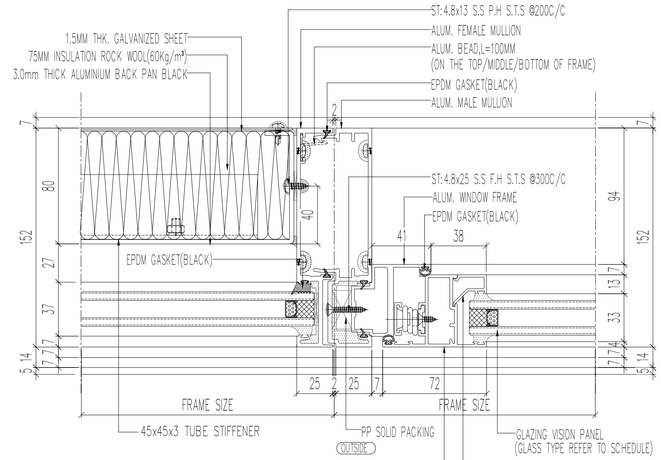
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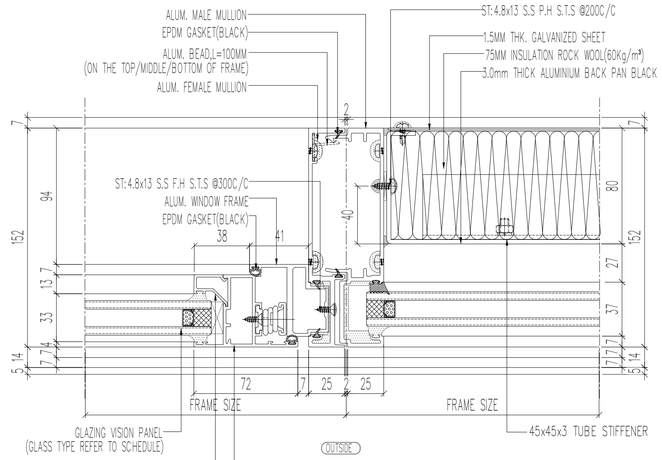
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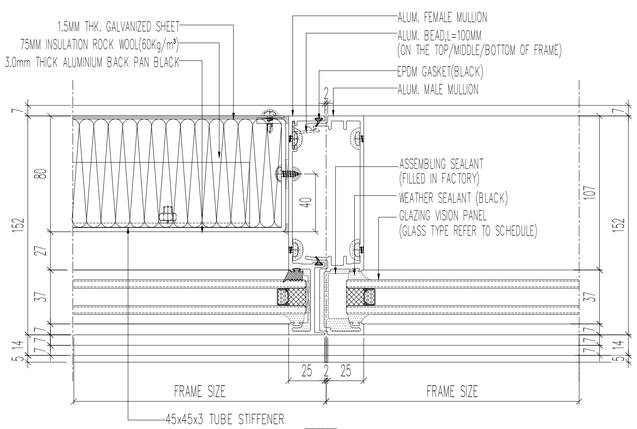
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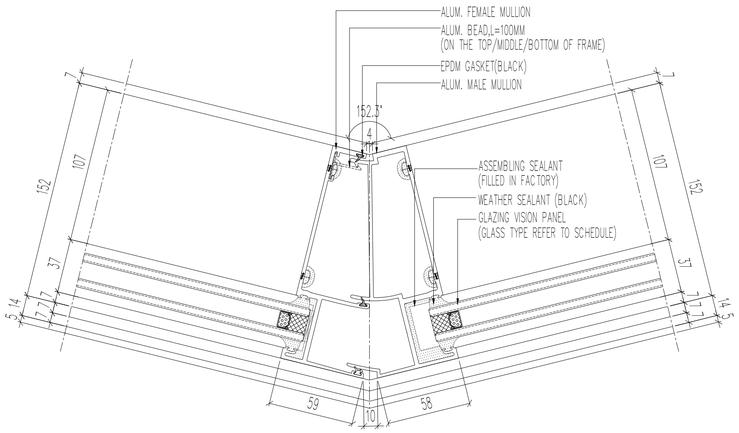
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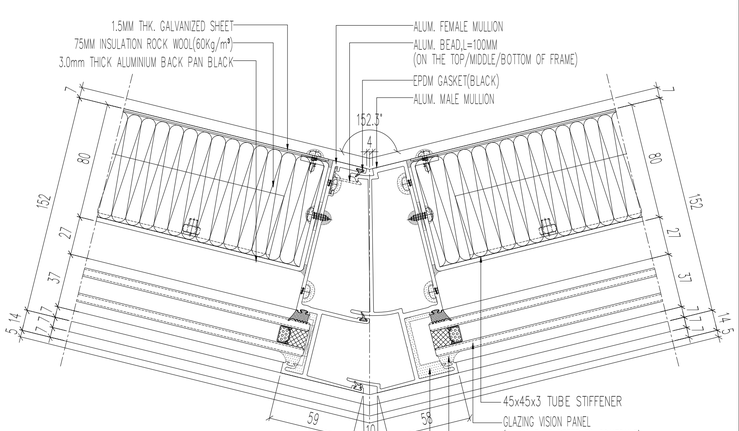
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BUILDER & DEVELOPER

BASTION

ARCHITECT

bda architecture

ENGINEERING DESIGN

SYNOVA
SYNOVA FACADE LIMITED

SYSTEM PROVIDER

SpecWise
FACADE LIMITED

REV	DATE	BY	DESCRIPTION
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01	15-05-26	DAN	FOR APPROVAL

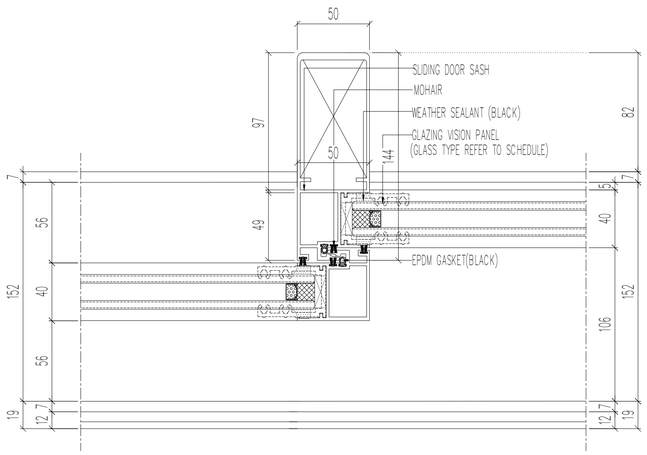
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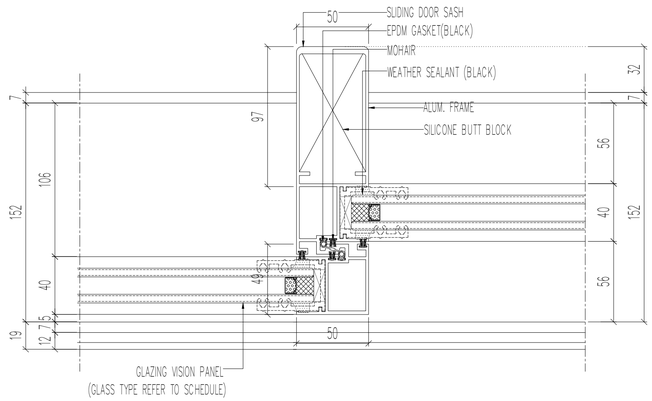
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NERA
8-10 Pomeno Street on Chevron Island,
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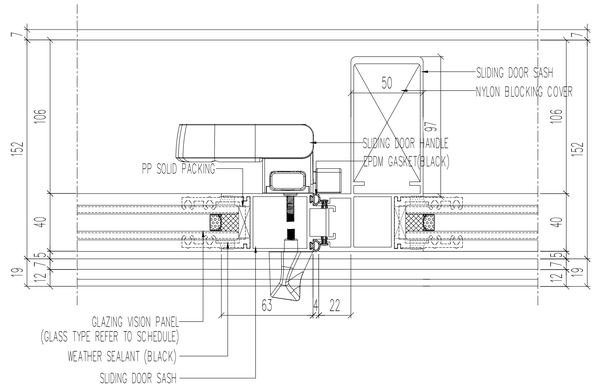
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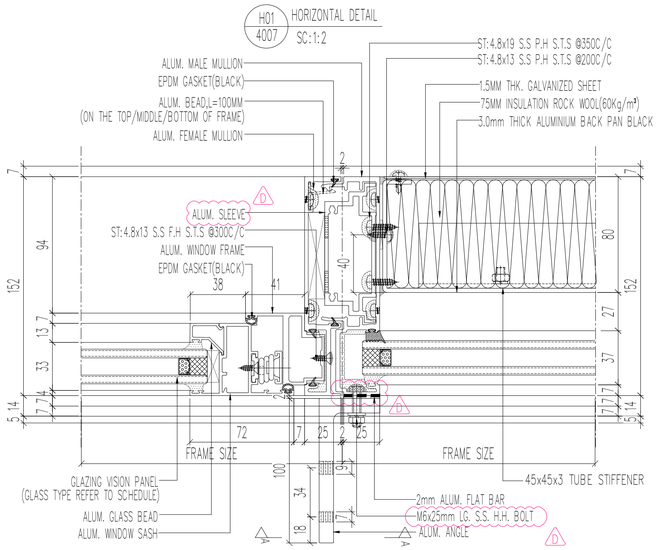
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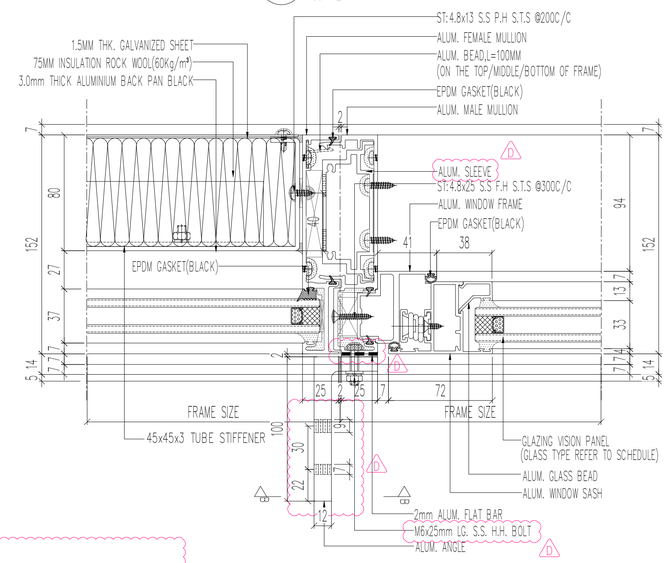




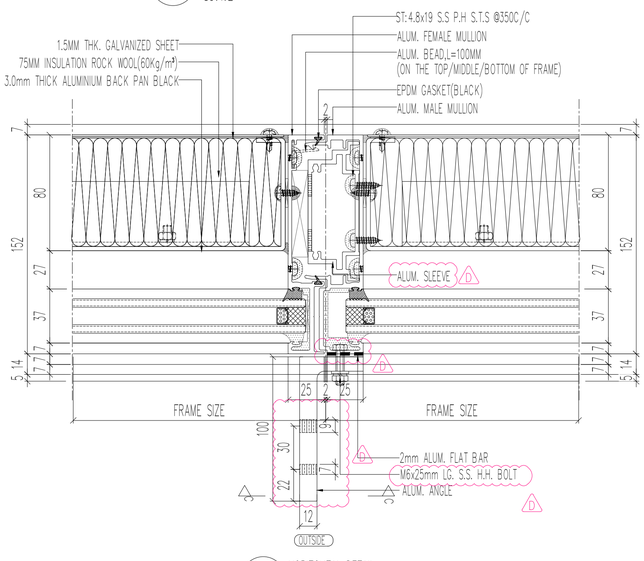
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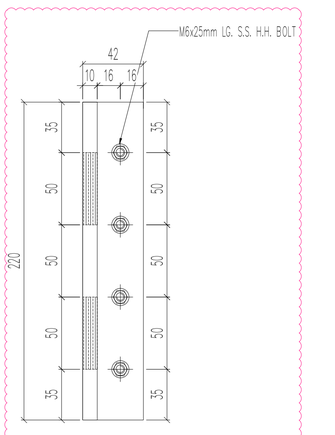
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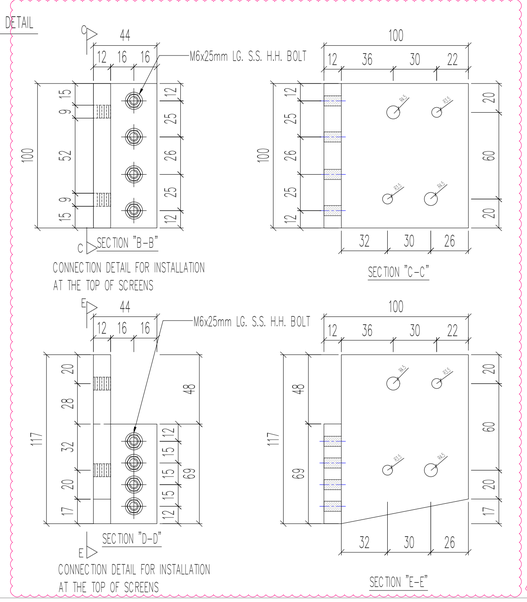


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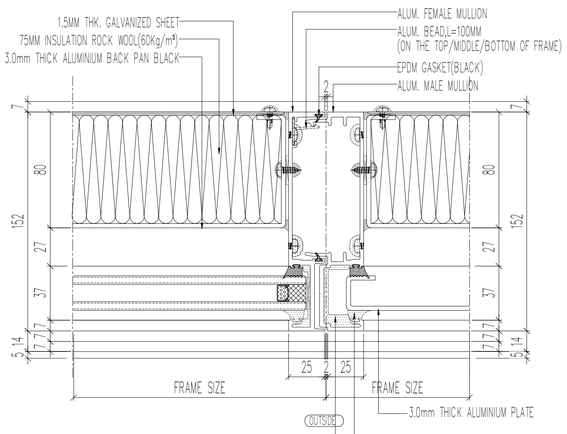


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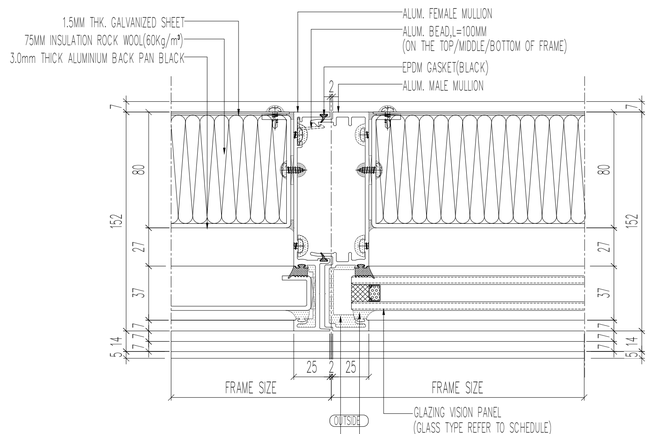




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H07 4007 HORIZONTAL DETAIL SC:1:2



H08 4007 HORIZONTAL DETAIL SC:1:2

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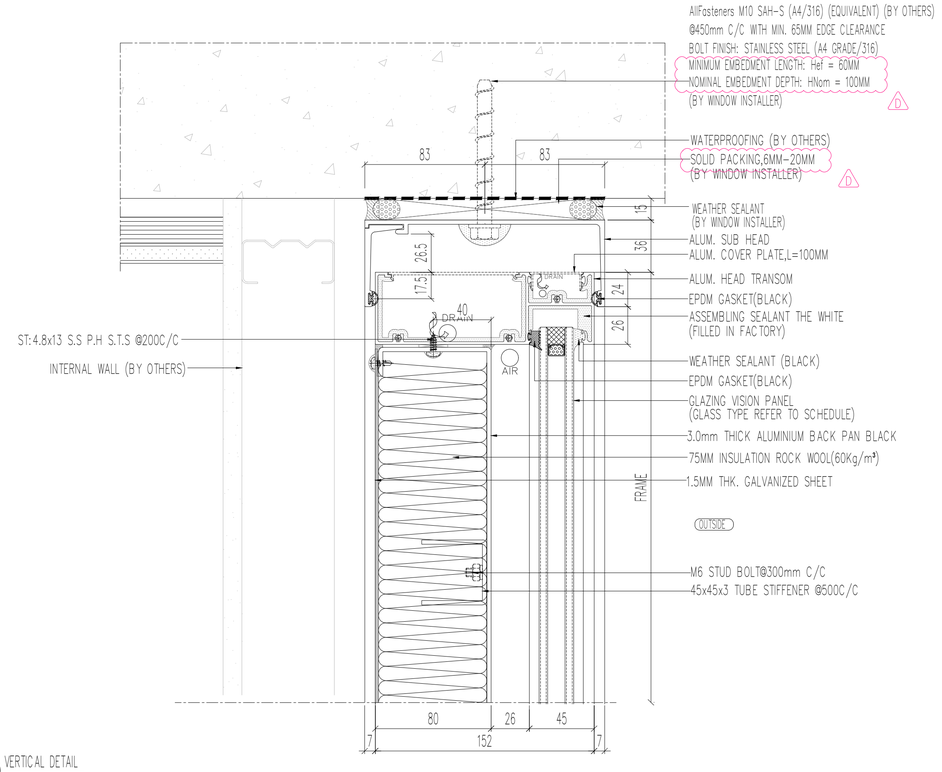
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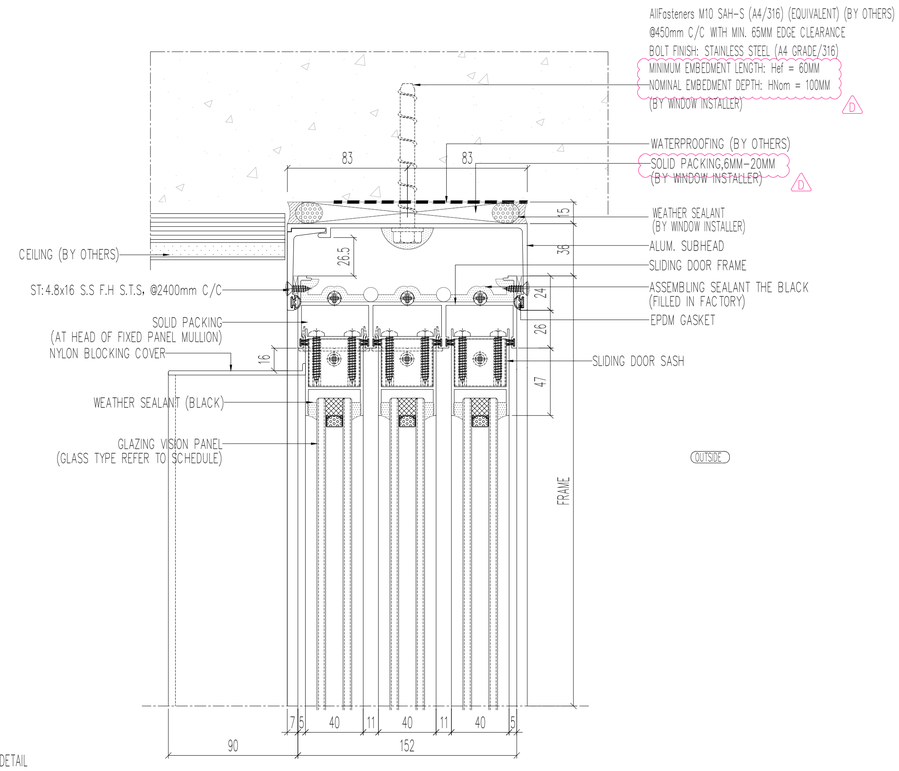
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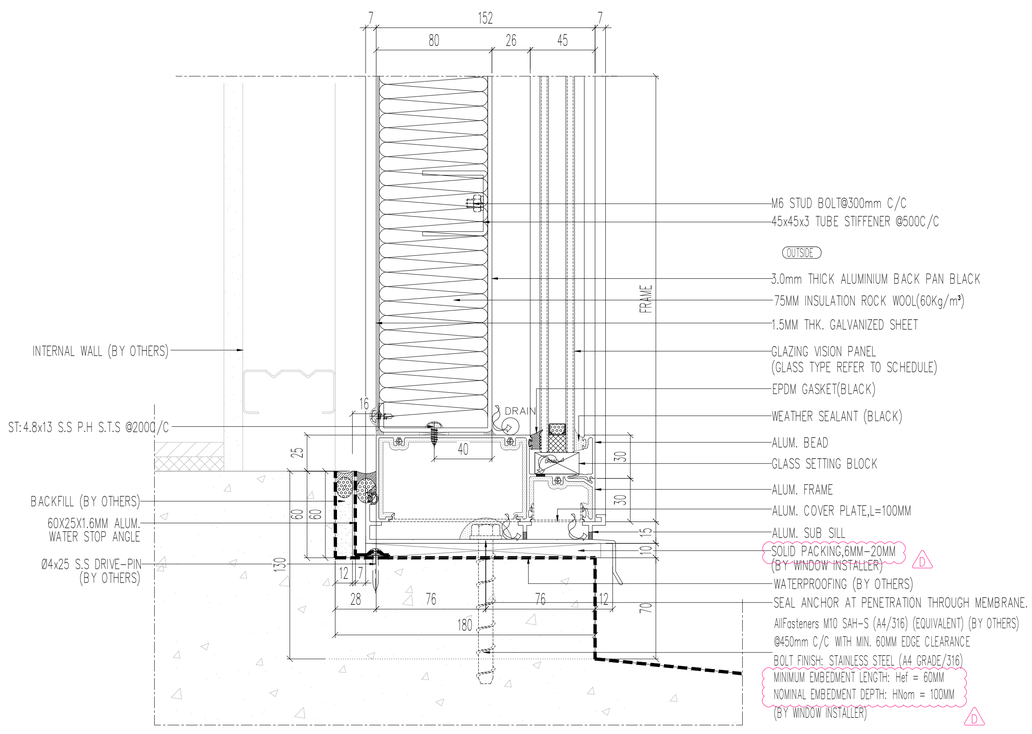
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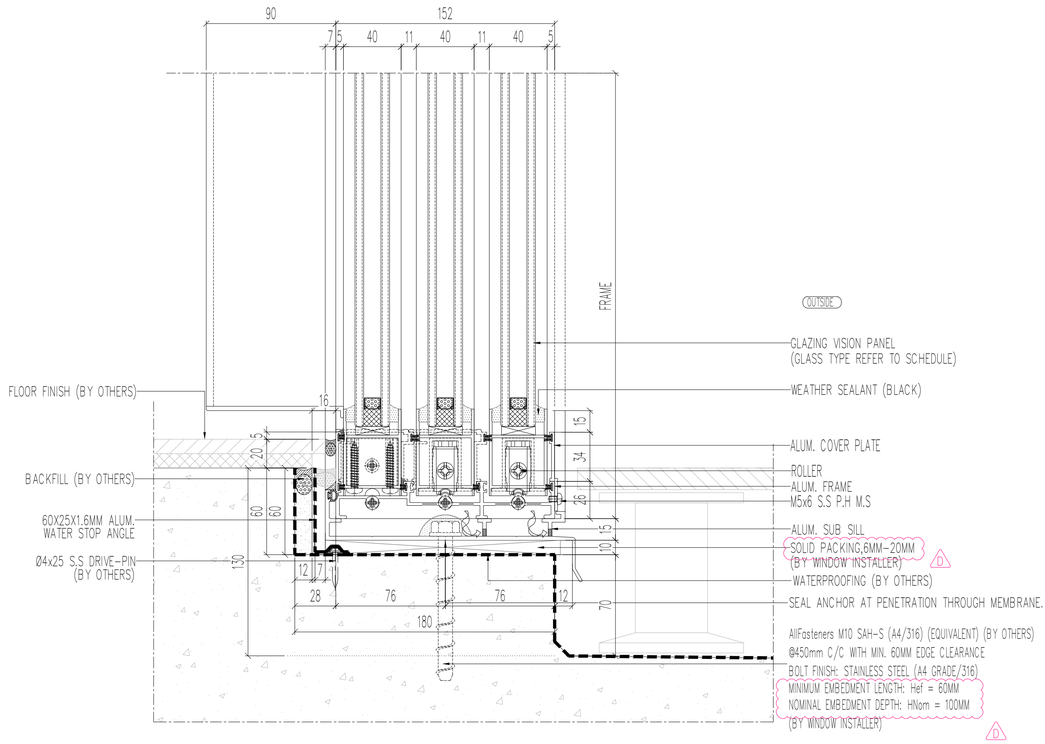
V01 5002 VERTICAL DETAIL SC:1:2



V03 5002 VERTICAL DETAIL SC:1:2



V02 5002 VERTICAL DETAIL SC:1:2



V04 5002 VERTICAL DETAIL SC:1:2

SYNOVA'S OBLIGATIONS REGARDING DIMENSIONAL ACCURACY ARE STRICTLY LIMITED TO THE APPROVED SHOP DRAWINGS ONLY.

BUILDER & DEVELOPER

BASTION

ARCHITECT

bda architecture

ENGINEERING DESIGN

SYNOVA
SYNOVA FACADE LIMITED

SYSTEM PROVIDER

SpecWise
FACADE LIMITED

REV.	DATE	BY	DESCRIPTION
D	07-09-26	MON	FOR CONSTRUCTION
C	30-07-26	MON	FOR CONSTRUCTION
B	20-07-26	MON	FOR CONSTRUCTION
A	03-07-26	MON	FOR CONSTRUCTION
02	12-06-26	LANM	FOR APPROVAL
01	15-05-26	DAN	FOR APPROVAL

ISSUE STATUS
FOR CONSTRUCTION

PROJECT
NERA
8-10 Pomeno Street on Chevron Island,
Surfers Paradise, QLD 4217, Australia

DRAWING TITLE
HORIZONTAL DETIAL
-

DRAWN	DESIGN	APPROVED	DATE	SCALE(A1)
DANNY	DANNY	FRANK	07-09-26	1:2

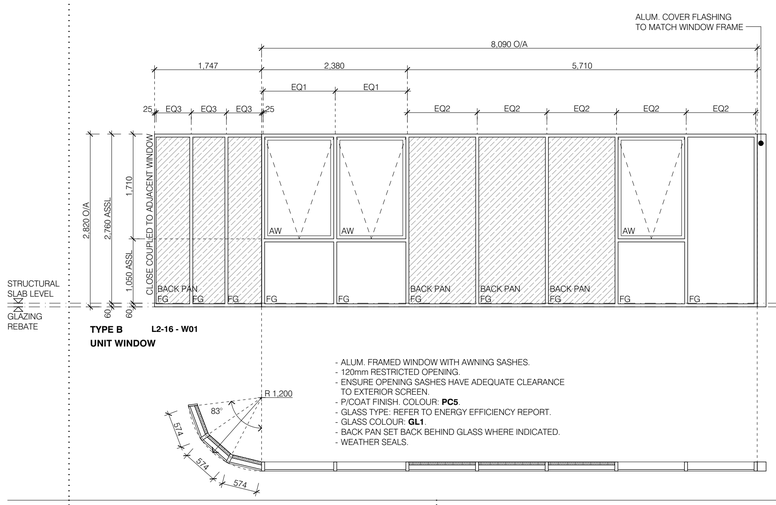
PROJECT NO.	DRAWING NO.	REV.
SY0201	FC-SD-5002	D

ATTACHMENT B – ARCHITECTURAL WINDOW SCHEDULES (EXTRACT)

Two sheets from the BDA Architecture window schedules for NERA (project 549500, issued for construction) follow this page: A5.102 Issue 4 (typical floors, 2,820 mm, with Levels 26–28 at 3,040 mm) and A5.105 Issue 4 (Levels 28, 29, pool level and Level 30, 3,040 to 3,960 mm). The table below summarises heights across all seven sheets, A5.101 to A5.107. Heights are overall structural opening heights as shown on the schedules. Interior glazing on Level 30 (types BG and BH) is not part of the façade and is excluded.

LOCATION	WINDOW TYPES	DRAWING (BDA ARCHITECTURE)	O/A HEIGHT (MM)
Level 1 (ground) lobby	A (L1(G)-W01, W02)	A5.101 Issue 4	5,400
Levels 2–25	B to AH (typical unit, plant and lobby types)	A5.102 Issue 4, A5.103 Issue 6, A5.104 Issue 5	2,820
Levels 26–28	Typical types where noted L26–27 / L26–28, and L28 types AJ to AT	A5.102 Issue 4 to A5.105 Issue 4	3,040
Level 29	AL to AT where noted L29	A5.105 Issue 4	3,150
Level 29	AK (sliding doors), BJ, BK	A5.105 Issue 4, A5.107 Issue 4	3,960
Pool level	Q, AN, AP, AQ, AS, AH where noted POOL	A5.103 Issue 6 to A5.105 Issue 4	3,150
Level 30	AQ, AW to BF (external types)	A5.105 Issue 4, A5.106 Issue 5, A5.107 Issue 4	3,310

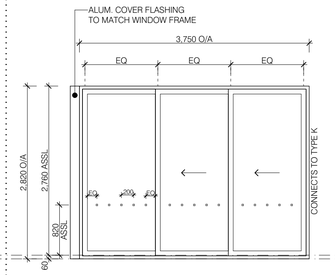
Note: Level 30 types on A5.106 and A5.107 are marked under review by the architect. The heights shown are from the current issue.



TYPE B L2-16 - W01

UNIT WINDOW

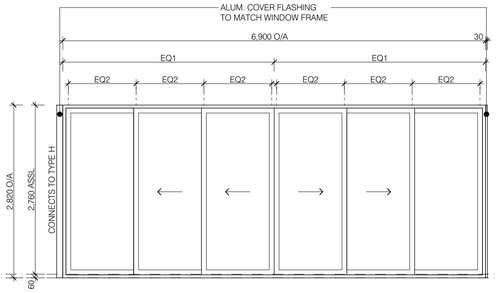
- ALUM. FRAMED WINDOW WITH AWNING SASHES.
- 120mm RESTRICTED OPENING.
- ENSURE OPENING SASHES HAVE ADEQUATE CLEARANCE TO EXTERIOR SCREEN.
- P/COAT FINISH. COLOUR: **PC5**.
- GLASS TYPE: REFER TO ENERGY EFFICIENCY REPORT.
- GLASS COLOUR: **GL1**.
- BACK PAN SET BACK BEHIND GLASS WHERE INDICATED.
- WEATHER SEALS.



TYPE C L2-16 - W02

UNIT WINDOW

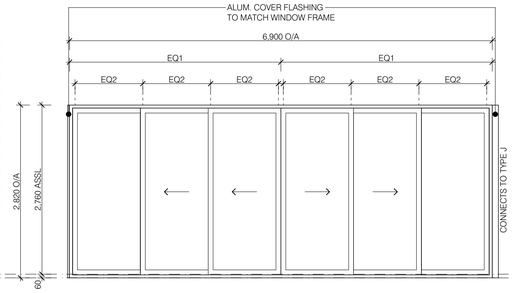
- ALUM. FRAMED SLIDING GLAZED DOORS.
- P/COAT FINISH. COLOUR: **PC5**.
- GLASS TYPE: REFER TO ENERGY EFFICIENCY REPORT.
- GLASS COLOUR: **GL1**.
- WEATHER SEALS.



TYPE D L2-16 - W03

UNIT WINDOW

- ALUM. FRAMED SLIDING GLAZED DOORS.
- P/COAT FINISH. COLOUR: **PC5**.
- GLASS TYPE: REFER TO ENERGY EFFICIENCY REPORT.
- GLASS COLOUR: **GL1**.
- WEATHER SEALS.



TYPE E L2-16 - W04

UNIT WINDOW

- ALUM. FRAMED SLIDING GLAZED DOORS.
- P/COAT FINISH. COLOUR: **PC5**.
- GLASS TYPE: REFER TO ENERGY EFFICIENCY REPORT.
- GLASS COLOUR: **GL1**.
- WEATHER SEALS.

WINDOW SCHEDULE GENERAL NOTES:

GENERAL
- ALL FRAMES SHOWN VIEWED FROM THE OUTSIDE UNO.
- ALL WINDOWS TO COMPLY WITH AS 2047 PARTS 1 & 2.
- ALL GLAZING TO COMPLY WITH AS 1288.
- TRANSLUCENT GLASS TO BE ACID ETCHED 'SATINA'.
- DIMENSIONS SHOWN ARE NOMINAL STRUCTURAL OPENING SIZES.
- EXTENT & TYPE OF VISUAL INDICATORS TO COMPLY WITH NCC & AS1428 REQUIREMENTS. SAMPLE OF PROPOSED VIS. IND. TO BE APPROVED BY ARCHITECT PRIOR TO INSTALLATION.
- WINDOW SCHEDULE TO BE READ IN CONJUNCTION WITH SECTION J, FIRE REPORT & ACOUSTIC REQUIREMENTS.
- DIMENSIONS SHOWN ARE FROM SSL UNO.
- TOP OF WINDOW SILL TO BE FLUSH WITH FFL UNO.
- CONTRACTOR TO MEASURE ON SITE & ALLOW FOR APPROPRIATE TOLERANCES PRIOR TO FABRICATION.
- ALL WINDOW & SLIDING DOOR FRAMING TO BE IN ACCORDANCE WITH THE SPECIFICATION.
- ALL WINDOW & SLIDING DOOR HARDWARE AS SPECIFIED. NO TIMBER REVEALS.
- ALL AWNING WINDOWS TO BE PROVIDED WITH 120MM OPENING RESTRICTORS AS REQUIRED BY THE NCC.
- ALL FRICTION STAYS TO BE ADJUSTABLE STAINLESS STEEL WHERE APPLICABLE.
- DOOR FURNITURE TO BE MOUNTED 1,000mm ABOVE THE FINISHED FLOOR LEVEL.
- ALL HINGES & FIXINGS TO BE STAINLESS STEEL. READ IN CONJUNCTION WITH DOOR HARDWARE SCHEDULE.
- ALL SLIDING DOOR & WINDOW FRAMES IN RENDERED CLADDING SYSTEM TO BE FULLY SEALED & MADE WATERTIGHT IN COMPLIANCE WITH MANUFACTURERS SPECIFICATIONS.
- PROVIDE CUT-OUTS TO DOOR FRAMES TO SUIT ELECTRIC STRIKES.
- REFER TO ACOUSTIC REPORT FOR ACOUSTIC REQUIREMENTS OF WINDOW SYSTEMS & GLASS.
- REFER TO FIRE REPORT FOR FIRE RATING REQUIREMENTS OF DOOR SYSTEMS.

WINDOW DESIGN
IN ORDER TO SATISFY THE REQUIREMENTS PART F OF THE BUILDING CODE OF AUSTRALIA, MINIMUM DESIGN PRESSURES SHALL BE ADOPTED FOR THE PURPOSES OF COMPLIANCE WITH AS 2047, 2001. A CERTIFICATE TO THE EFFECT THAT WINDOWS WILL BE SUPPLIED & INSTALLED IN ACCORDANCE WITH THE ABOVE SHALL BE PROVIDED PRIOR TO ANY WINDOW INSTALLATION.
THE CERTIFICATE SHALL INCLUDE ANY REFLECTIVITY REQUIREMENTS THAT MAY BE IMPOSED BY COUNCIL & THE MINIMUM PRESSURE ADOPTED FOR THE WINDOW DESIGN.
REFER TO STRUCTURAL ENGINEERS DOCUMENTATION FOR DETAILS OF TERRAIN CATEGORY ETC.
WINDOWS TO COMPLY WITH THE REQUIREMENTS OF AS 4654.

WINDOW LEGEND:

ACP	SOLID ALUMINIUM COVER PLATE
AW	AWNING WINDOW
CB	COLOURBACK GLASS
FG	FIXED GLASS
OG	OBSCURE GLASS
RO	RESTRICTED OPENING
SD	SLIDING DOOR
SP	SPANDREL PANEL
SW	SLIDING WINDOW
MV	MECHANICAL VENT

INSULATED ALUMINUM BACKPAN BEHIND GLASS

TRANSLUCENT GLASS (FROSTED)

DOOR SCHEDULE LEGEND:

FCL	FINISHED CEILING LEVEL (ABOVE FFL)
FFL	FINISHED FLOOR LEVEL
FRL	FIRE RESISTANCE LEVEL
(M)	DENOTES MIRRORED DOOR
NOM	NOMINAL
PWD	PERSON WITH DISABILITY

DOOR OPENS AWAY FROM VIEWER

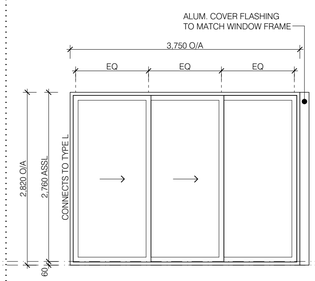
DOOR OPENS TOWARDS VIEWER

GLASS / MIRROR

INSULATED ALUMINUM BACKPAN BEHIND GLASS

TRANSLUCENT GLASS (FROSTED)

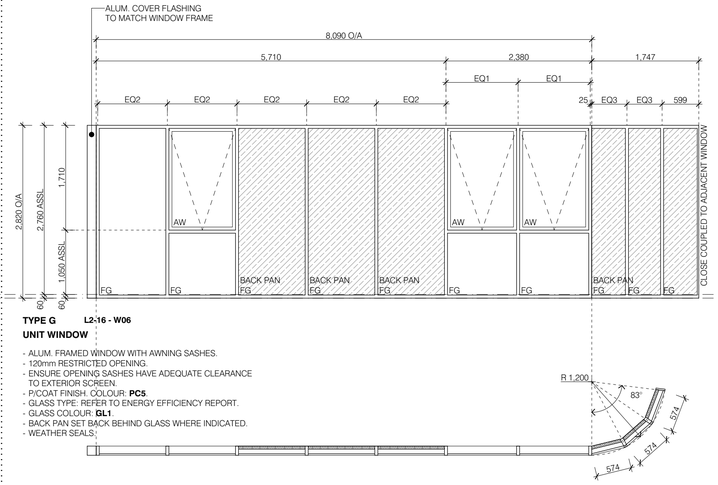
NOTE: REFER TO STRUCTURAL ENGINEER'S REPORT FOR STRUCTURE DEFLECTION ALLOWANCES TO BE ALLOWED FOR BY WINDOW / DOOR MANUFACTURER.



TYPE F L2-16 - W05

UNIT WINDOW

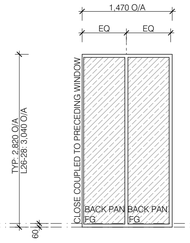
- ALUM. FRAMED SLIDING GLAZED DOORS.
- P/COAT FINISH. COLOUR: **PC5**.
- GLASS TYPE: REFER TO ENERGY EFFICIENCY REPORT.
- GLASS COLOUR: **GL1**.
- WEATHER SEALS.



TYPE G L2-16 - W06

UNIT WINDOW

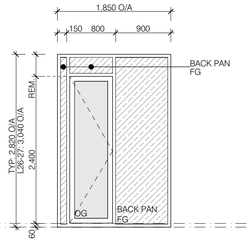
- ALUM. FRAMED WINDOW WITH AWNING SASHES.
- 120mm RESTRICTED OPENING.
- ENSURE OPENING SASHES HAVE ADEQUATE CLEARANCE TO EXTERIOR SCREEN.
- P/COAT FINISH. COLOUR: **PC5**.
- GLASS TYPE: REFER TO ENERGY EFFICIENCY REPORT.
- GLASS COLOUR: **GL1**.
- BACK PAN SET BACK BEHIND GLASS WHERE INDICATED.
- WEATHER SEALS.



TYPE H L2-16 - W07, L17-27 - W08

PLANT 2 (NORTH)

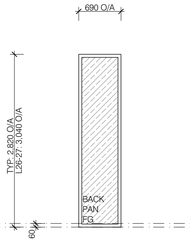
- ALUM. FRAMED WINDOW.
- P/COAT FINISH. COLOUR: **PC5**
- GLASS TYPE: REFER TO ENERGY EFFICIENCY REPORT.
- GLASS COLOUR: **GL1**.
- WEATHER SEALS.



TYPE J L2-16 - W08, L17-27 - W09

PLANT 2 (NORTH)

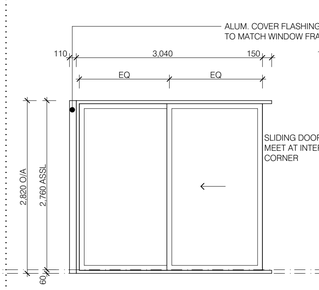
- ALUM. FRAMED GLAZED SWING DOOR.
- P/COAT FINISH. COLOUR: **PC5**.
- GLASS TYPE: REFER TO ENERGY EFFICIENCY REPORT.
- SINGLE GLAZED WITH TRANSLUCENT GLASS TO ALLOW LIGHT INTO LOBBY & BLOCK VIEW OUT TO SERVICES SPACE.
- GLASS COLOUR: **GL4**.
- SELF-CLOSING.
- CARD READER & ELECTRIC STRIKE.
- FREE EGRESS FROM EXTERIOR TO INTERIOR.
- DOOR STOP.
- HARDWARE AS SCHEDULED.
- WEATHER SEALS.

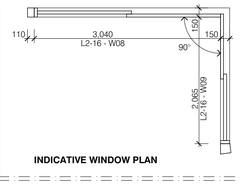


TYPE K L2-16 - W09, L17-27 - W10
L2-16 & L19-27 - W19, L17-18 - W20

PLANT 1 & 2

- ALUM. FRAMED WINDOW.
- P/COAT FINISH. COLOUR: **PC5**.
- GLASS TYPE: REFER TO ENERGY EFFICIENCY REPORT.
- GLASS COLOUR: **GL1**.
- WEATHER SEALS.





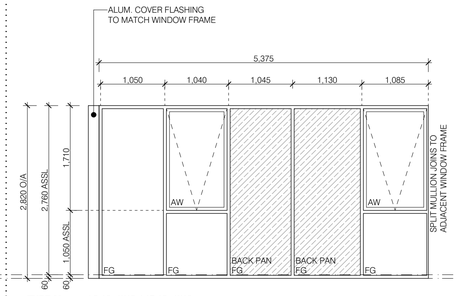
INDICATIVE WINDOW PLAN

TYPE L L2-16 - W10, L17-18 - W11

L2-16 - W11, L17-18 - W12

UNIT WINDOW

- ALUM. FRAMED SLIDING GLAZED DOORS.
- DOORS MEET AT AN INTERNAL CORNER WITHOUT A POST.
- P/COAT FINISH. COLOUR: **PC5**.
- GLASS TYPE: REFER TO ENERGY EFFICIENCY REPORT.
- GLASS COLOUR: **GL1**.
- WEATHER SEALS.

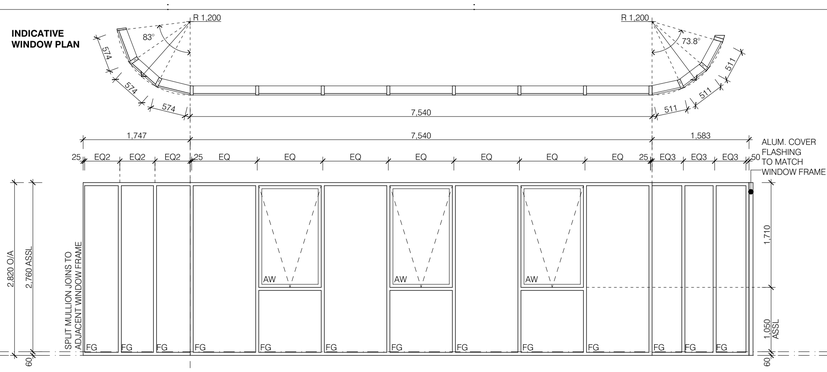


TYPE M L2-16 - W12, L17-18 - W13

UNIT WINDOW

- ALUM. FRAMED WINDOW WITH AWNING SASHES.
- 120mm RESTRICTED OPENING.
- ENSURE OPENING SASHES HAVE ADEQUATE CLEARANCE TO EXTERIOR SCREEN.
- P/COAT FINISH. COLOUR: **PC5**.
- GLASS TYPE: REFER TO ENERGY EFFICIENCY REPORT.
- GLASS COLOUR: **GL1**.
- BACK PAN SET BACK BEHIND GLASS WHERE INDICATED.
- WEATHER SEALS.

INDICATIVE WINDOW PLAN



TYPE N (DEVELOPED ELEVATION) L2-16 - W13, L17-18 - W14

UNIT WINDOW

- ALUM. FRAMED WINDOW WITH AWNING SASHES.
- 120mm RESTRICTED OPENING.
- ENSURE OPENING SASHES HAVE ADEQUATE CLEARANCE TO EXTERIOR SCREEN.
- P/COAT FINISH. COLOUR: **PC5**.
- GLASS TYPE: REFER TO ENERGY EFFICIENCY REPORT.
- GLASS COLOUR: **GL1**.
- WEATHER SEALS.

DESIGN ARCHITECT:
PLUS ARCHITECTURE

DOCUMENTATION ARCHITECT:
BDA ARCHITECTURE

AMENDMENT REGISTER

ISSUE	DESCRIPTION	DATE	INITIAL
A	PRELIMINARY ISSUE	04/10/2024	MH
B	DESIGN DEVELOPMENT	15/07/2025	MH
C	DESIGN DEVELOPMENT	16/01/2026	MH
D	DESIGN DEVELOPMENT	11/02/2026	MH
1	ISSUED FOR CONSTRUCTION	13/03/2026	MH
2	ISSUED FOR CONSTRUCTION	05/05/2026	MH
3	ISSUED FOR CONSTRUCTION	17/07/2026	MH
4	ISSUED FOR CONSTRUCTION	24/08/2026	MH

ISSUED FOR CONSTRUCTION

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VERIFICATION
Verify all dimensions, siting, window sizes, positioning, and setting out on site before commencing construction or manufacture. Do NOT scale from drawings. Refer any discrepancy immediately to BDA Architecture for instruction.

CLIENT
BASTION GROUP

AUTHORISATION

PLOT DATE: 22/08/2026

REG. NO. 3919

NORTH

KEYPLAN

PROJECT NAME
NERA CHEVRON ISLAND

LOCATION
8-10 PARNENO ST, CHEVRON ISLAND

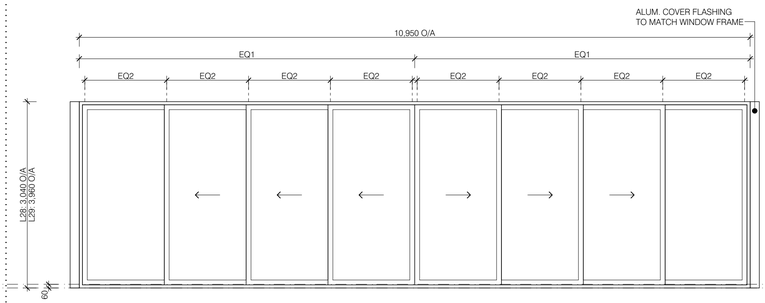
STAGE
CONSTRUCTION DOCUMENTATION

DRAWING TITLE
WINDOW SCHEDULE - 2

SCALE 1:50 @ A1
DATE OCT 2024
DRAWN MH
PROJECT NO. 549500
DRAWING NO. A5.102
ISSUE 4

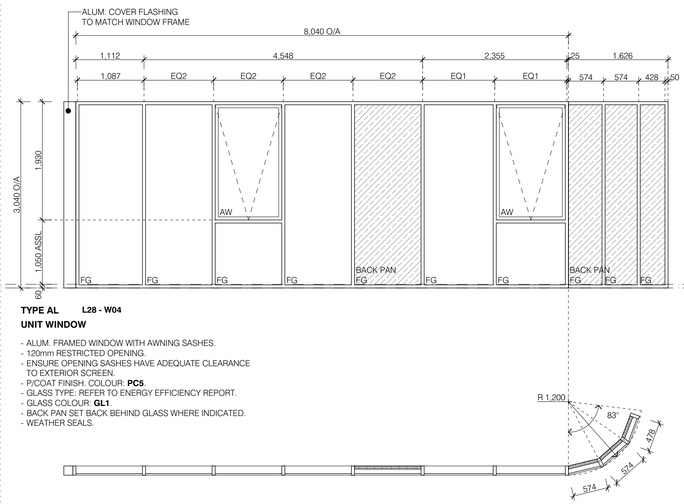
50 Peerless Avenue,
Mermaid Beach QLD 4218
Phone: (07) 5555 2600
Email: bda@bdaarch.com.au
ABN 77 081 702 301

bda architecture



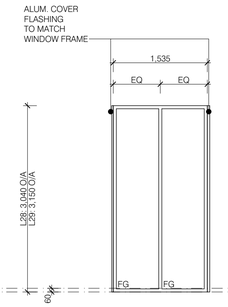
TYPE AK **L28 - W02 & W03 (MIRRORED)**
UNIT WINDOW **L29 - W02 & W03 (MIRRORED)**

- ALUM. FRAMED SLIDING GLAZED DOORS.
- P/COAT FINISH. COLOUR: **PC5**.
- GLASS TYPE: REFER TO ENERGY EFFICIENCY REPORT.
- GLASS COLOUR: **GL1**.
- WEATHER SEALS.



TYPE AL **L28 - W04**
UNIT WINDOW

- ALUM. FRAMED WINDOW WITH AWNING SASHES.
- 120mm RESTRICTED OPENING.
- ENSURE OPENING SASHES HAVE ADEQUATE CLEARANCE TO EXTERIOR SCREEN.
- P/COAT FINISH. COLOUR: **PC5**.
- GLASS TYPE: REFER TO ENERGY EFFICIENCY REPORT.
- GLASS COLOUR: **GL1**.
- BACK PAN SET BACK BEHIND GLASS WHERE INDICATED.
- WEATHER SEALS.



TYPE AM **L28 - W05, L29 - W05**
UNIT WINDOW

- ALUM. FRAMED WINDOW.
- P/COAT FINISH. COLOUR: **PC5**.
- GLASS TYPE: REFER TO ENERGY EFFICIENCY REPORT.
- GLASS COLOUR: **GL1**.
- WEATHER SEALS.

WINDOW SCHEDULE GENERAL NOTES:

GENERAL
- ALL FRAMES SHOWN VIEWED FROM THE OUTSIDE UNO.
- ALL WINDOWS TO COMPLY WITH AS 2047 PARTS 1 & 2.
- ALL GLAZING TO COMPLY WITH AS 1288.
- TRANSLUCENT GLASS TO BE ACID ETCHED 'SATINA'.
- DIMENSIONS SHOWN ARE NOMINAL STRUCTURAL OPENING SIZES.
- EXTENT & TYPE OF VISUAL INDICATORS TO COMPLY WITH NCC & AS1428 REQUIREMENTS. SAMPLE OF PROPOSED VIS. IND. TO BE APPROVED BY ARCHITECT PRIOR TO INSTALLATION.
- WINDOW SCHEDULE TO BE READ IN CONJUNCTION WITH SECTION J, FIRE REPORT & ACOUSTIC REQUIREMENTS.
- DIMENSIONS SHOWN ARE FROM SSL UNO.
- TOP OF WINDOW SILL TO BE FLUSH WITH FFL UNO.
- CONTRACTOR TO MEASURE ON SITE & ALLOW FOR APPROPRIATE TOLERANCES PRIOR TO FABRICATION.
- ALL WINDOW & SLIDING DOOR FRAMING TO BE IN ACCORDANCE WITH THE SPECIFICATION.
- ALL WINDOW & SLIDING DOOR HARDWARE AS SPECIFIED, NO TIMBER REVEALS.
- ALL AWNING WINDOWS TO BE PROVIDED WITH 125MM OPENING RESTRICTORS AS REQUIRED BY THE NCC.
- ALL FRICTION STAYS TO BE ADJUSTABLE STAINLESS STEEL WHERE APPLICABLE.
- DOOR FURNITURE TO BE MOUNTED 1,000mm ABOVE THE FINISHED FLOOR LEVEL.
- ALL HINGES & FIXINGS TO BE STAINLESS STEEL. READ IN CONJUNCTION WITH DOOR HARDWARE SCHEDULE.
- ALL SLIDING DOOR & WINDOW FRAMES IN RENDERED CLADDING SYSTEM TO BE FULLY SEALED & MADE WATERTIGHT IN COMPLIANCE WITH MANUFACTURERS SPECIFICATIONS.
- PROVIDE CUT-OUTS TO DOOR FRAMES TO SUIT ELECTRIC STRIKES.
- REFER TO ACOUSTIC REPORT FOR ACOUSTIC REQUIREMENTS OF WINDOW SYSTEMS & GLASS.
- REFER TO FIRE REPORT FOR FIRE RATING REQUIREMENTS OF DOOR SYSTEMS.

WINDOW DESIGN
IN ORDER TO SATISFY THE REQUIREMENTS PART F OF THE BUILDING CODE OF AUSTRALIA, MINIMUM DESIGN PRESSURES SHALL BE ADOPTED FOR THE PURPOSES OF COMPLIANCE WITH AS 2047, 2001. A CERTIFICATE TO THE EFFECT THAT WINDOWS WILL BE SUPPLIED & INSTALLED IN ACCORDANCE WITH THE ABOVE SHALL BE PROVIDED PRIOR TO ANY WINDOW INSTALLATION.
THE CERTIFICATE SHALL INCLUDE ANY REFLECTIVITY REQUIREMENTS THAT MAY BE IMPOSED BY COUNCIL & THE MINIMUM PRESSURE ADOPTED FOR THE WINDOW DESIGN.
REFER TO STRUCTURAL ENGINEERS DOCUMENTATION FOR DETAILS OF TERRAIN CATEGORY ETC.
WINDOWS TO COMPLY WITH THE REQUIREMENTS OF AS 4654.

WINDOW LEGEND:

ACP	SOLID ALUMINIUM COVER PLATE
AW	AWNING WINDOW
CB	COLOURBACK GLASS
FG	FIXED GLASS
OG	OBSCURE GLASS
RO	RESTRICTED OPENING
SD	SLIDING DOOR
SP	SPANDREL PANEL
SW	SLIDING WINDOW
MV	MECHANICAL VENT

INSULATED ALUMINUM BACKPAN BEHIND GLASS

TRANSLUCENT GLASS (FROSTED)

DOOR SCHEDULE LEGEND:

FCL	FINISHED CEILING LEVEL (ABOVE FFL)
FFL	FINISHED FLOOR LEVEL
FRL	FIRE RESISTANCE LEVEL
(M)	DENOTES MIRRORED DOOR
NOM	NOMINAL
PWD	PERSON WITH DISABILITY

DOOR OPENS AWAY FROM VIEWER

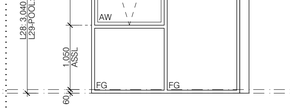
DOOR OPENS TOWARDS VIEWER

GLASS / MIRROR

INSULATED ALUMINUM BACKPAN BEHIND GLASS

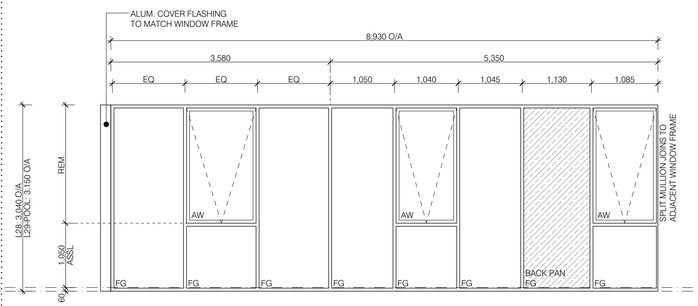
TRANSLUCENT GLASS (FROSTED)

NOTE: REFER TO STRUCTURAL ENGINEER'S REPORT FOR STRUCTURE DEFLECTION ALLOWANCES TO BE ALLOWED FOR BY WINDOW / DOOR MANUFACTURER.



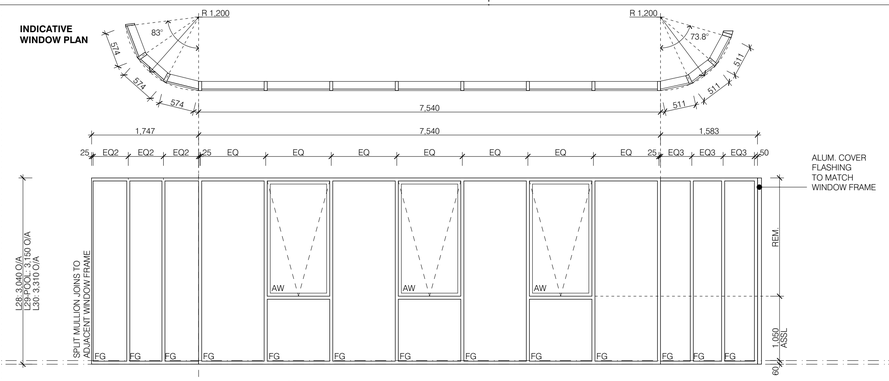
TYPE AN **L28 - W06, L29 - W06, POOL - W02**
UNIT WINDOW

- ALUM. FRAMED WINDOW WITH AWNING SASH.
- 120mm RESTRICTED OPENING.
- P/COAT FINISH. COLOUR: **PC5**.
- GLASS TYPE: REFER TO ENERGY EFFICIENCY REPORT.
- GLASS COLOUR: **GL1**.
- WEATHER SEALS.



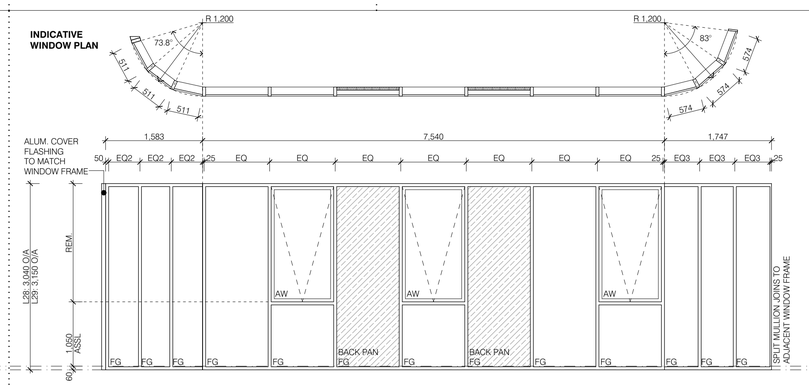
TYPE AP **L28 - W07, L29 - W07, POOL - W03**
UNIT WINDOW

- ALUM. FRAMED WINDOW WITH AWNING SASHES.
- WINDOW MULLIONS TO ALIGN WITH WINDOW BELOW. REFER TO BUILDING ELEVATIONS.
- 120mm RESTRICTED OPENING.
- P/COAT FINISH. COLOUR: **PC5**.
- GLASS TYPE: REFER TO ENERGY EFFICIENCY REPORT.
- GLASS COLOUR: **GL1**.
- BACK PAN SET BACK BEHIND GLASS WHERE INDICATED.
- WEATHER SEALS.



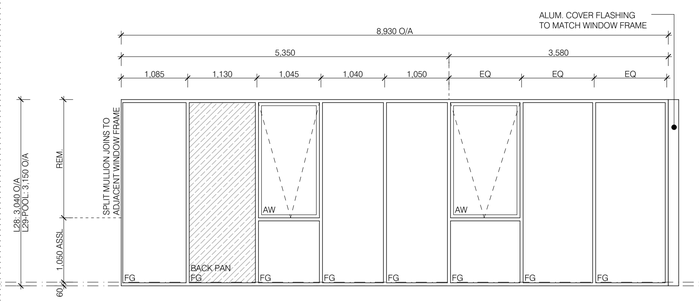
TYPE AQ (DEVELOPED ELEVATION) **L28 - W08, L29 - W08, POOL - W04, L30 - W07**
UNIT WINDOW

- ALUM. FRAMED WINDOW WITH AWNING SASHES.
- 120mm RESTRICTED OPENING.
- ENSURE OPENING SASHES HAVE ADEQUATE CLEARANCE TO EXTERIOR SCREEN.
- P/COAT FINISH. COLOUR: **PC5**.
- GLASS TYPE: REFER TO ENERGY EFFICIENCY REPORT.
- GLASS COLOUR: **GL1**.
- WEATHER SEALS.



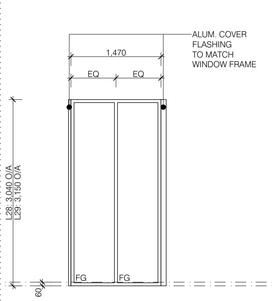
TYPE AR (DEVELOPED ELEVATION) **L28 - W10, L29 - W10**
UNIT WINDOW

- ALUM. FRAMED WINDOW WITH AWNING SASHES.
- 120mm RESTRICTED OPENING.
- ENSURE OPENING SASHES HAVE ADEQUATE CLEARANCE TO EXTERIOR SCREEN.
- P/COAT FINISH. COLOUR: **PC5**.
- GLASS TYPE: REFER TO ENERGY EFFICIENCY REPORT.
- GLASS COLOUR: **GL1**.
- BACK PAN SET BACK BEHIND GLASS WHERE INDICATED.
- WEATHER SEALS.



TYPE AS **L28 - W11, L29 - W11, POOL - W07**
UNIT WINDOW

- ALUM. FRAMED WINDOW WITH AWNING SASHES.
- WINDOW MULLIONS TO ALIGN WITH WINDOW BELOW. REFER TO BUILDING ELEVATIONS.
- 120mm RESTRICTED OPENING.
- P/COAT FINISH. COLOUR: **PC5**.
- GLASS TYPE: REFER TO ENERGY EFFICIENCY REPORT.
- GLASS COLOUR: **GL1**.
- BACK PAN SET BACK BEHIND GLASS WHERE INDICATED.
- WEATHER SEALS.



TYPE AT **L28 - W13, L29 - W13**
UNIT WINDOW

- ALUM. FRAMED WINDOW.
- ENSURE OPENING SASH HAS ADEQUATE CLEARANCE TO EXTERIOR SCREEN.
- P/COAT FINISH. COLOUR: **PC5**.
- GLASS TYPE: REFER TO ENERGY EFFICIENCY REPORT.
- GLASS COLOUR: **GL1**.
- WEATHER SEALS.

DESIGN ARCHITECT:
PLUS ARCHITECTURE

DOCUMENTATION ARCHITECT:
BDA ARCHITECTURE

AMENDMENT REGISTER

ISSUE	DESCRIPTION	DATE	INITIAL
A	PRELIMINARY ISSUE	04/10/2024	MH
B	DESIGN DEVELOPMENT	15/07/2025	MH
C	DESIGN DEVELOPMENT	16/01/2026	MH
D	DESIGN DEVELOPMENT	11/02/2026	MH
1	ISSUED FOR CONSTRUCTION	13/03/2026	MH
2	ISSUED FOR CONSTRUCTION	27/03/2026	MH
3	ISSUED FOR CONSTRUCTION	17/07/2026	MH
4	ISSUED FOR CONSTRUCTION	24/08/2026	MH

ISSUED FOR CONSTRUCTION

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VERIFICATION
Verify all dimensions, sitting, window sizes, positioning, and setting out on site before commencing construction or manufacture. Do NOT scale from drawings. Refer any discrepancy immediately to BDA Architecture for instruction.

CLIENT
BASTION GROUP

AUTHORISATION

PLOT DATE: 22/08/2026

REG. NO. 3919

NORTH

KEYPLAN

PROJECT NAME
NERA CHEVRON ISLAND

LOCATION
8-10 PARNENO ST, CHEVRON ISLAND

STAGE
CONSTRUCTION DOCUMENTATION

DRAWING TITLE
WINDOW SCHEDULE - 5

SCALE	DATE	DRAWN
1:50 @ A1	OCT 2024	MH
PROJECT NO.	DRAWING NO.	ISSUE
549500	A5.105	4

50 Peerless Avenue,
Mermaid Beach QLD 4218
Phone: (07) 5555 2600
Email: bda@bdaarch.com.au
ABN 77 081 702 301

bda architecture

Window Makers

28–32 Buchanan Street
Murwillumbah NSW 2484
02 6672 7239
info@windowmakers.com.au

27 October 2026

Bastion Group
Attention: Tom Carrington
By email: tc@bastion.group

NERA (Project 4217) – Supply of Windows

Dear Tom,

Thank you for approaching Window Makers about supplying windows for the NERA project.

Having reviewed the scope and programme, Window Makers does not have the production capacity to supply the windows for NERA within the project's current deadlines. We are therefore unable to offer to supply this package on the current programme.

Please contact me if you need anything further.

Kind regards,



James Gill
Director
Window Makers | Gill & Andrews Pty Ltd
Sales@windowmakers.com.au