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3 November 2026

Director
Investigations 1
Australian Trade Remedies Commission
GPO Box 2013
Canberra ACT 2601

Email: investigations1@atrc.gov.au

Dear Director,

Public File

Investigation No. 691 – Aluminium windows & doors from China
Industry submission: evidence of sovereign window wall capabilities

1. Introduction

Capral Limited (**Capral**) makes this supplementary 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 makes this submission in support of its fabricator customers that manufacture window wall. SEF 691 has found that window wall is within the goods description and is like goods. This submission provides letters from 32 Australian fabricators confirming that there is an established Australian manufacturing industry capable of manufacturing and supplying window wall systems for buildings in Class 2 and above.

These letters are provided at Confidential Attachment 1.

2. Australian window wall manufacturing

Several parties have incorrectly sought the exemption or exclusion of window wall on the basis that it is not produced in Australia.[2]

Each of the 32 fabricators has confirmed that it manufactures window wall systems in Australia for Class 2 and above buildings, and has provided examples of projects it has manufactured and supplied.

The letters confirm that:

- the window wall is fabricated, machined, assembled and glazed in Australia;
- window wall is an established part of each business;
- AWD fabricators have capacity to take on additional Class 2 and above window wall projects; and
- AAWD fabricators compete for this work directly with imported window wall.

[1] EPR 691, document no. 501.
[2] EPR 691, document nos. 409, 424, 430 and 446.

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3. Conclusion

The evidence confirms that window wall is manufactured in Australia and competes with the imported goods. Capral requests that the Commission maintain the SEF 691 finding and not recommend exempting window wall in its final report.

For and on behalf of Capral Limited