Supplementary Submission — Rebuttal to Key Supporting Submissions

Investigation No. 691 — Aluminium Windows and Doors from China

Prepared by: EcoEco Windows & Doors Pty Ltd
Related Submission: EPR 422
This supplementary submission should be read in conjunction with EcoEco's earlier submission EPR 422

1. Scope and Purpose

This supplementary submission responds to a number of the principal "in favour" submissions lodged in support of Investigation No. 691.

The purpose of this submission is to respectfully submit that the Commission should carefully test whether the alleged injury arises from domestic supply-chain structure, pricing architecture, and upstream margin layering before attributing the alleged injury to dumped or subsidised imports.

The central issue is causation.

2. Core Commercial Observation

EcoEco is commercially capable, without reliance upon subsidies, of supplying complete finished windows at approximately the same pricing level as commonly observed Australian market pricing for aluminium component supply alone.

Whilst aluminium profile systems are commonly supplied commercially to downstream fabricators in profile lengths ("stick" form), the underlying economics of aluminium supply within the industry, including EcoEco's own operations, are fundamentally benchmark-linked and assessed on a kilogram basis.

This observation arises from direct commercial participation within the Australian window industry, including importing, manufacturing, purchasing, quoting, and supply-chain engagement.

Where complete imported finished windows can be commercially supplied at approximately the same pricing level as commonly observed Australian aluminium component pricing alone, notwithstanding that underlying aluminium economics are fundamentally benchmark-linked through internationally traded commodity pricing mechanisms such as the LME and SFE, the Commission should carefully examine whether domestic supply-chain pricing structures contribute to the alleged injury indicators.

Noting that the application specifically excludes the importation of aluminium and glass independently, whilst including only fully assembled windows incorporating the same underlying aluminium and glass inputs, the Applicants and closely aligned entities participate directly within supply-chain structures that materially influence downstream pricing outcomes through upstream supply participation, proprietary systems, and distribution structures.

The Commission should carefully examine benchmark-linked landed aluminium cost, upstream margin layering, profile-system dependence, and whether anti-dumping measures would materially preserve existing domestic pricing structures.

The Commission should also carefully consider whether measures that materially preserve existing domestic pricing structures may reduce competitive pricing pressure within the downstream supply chain.

Comparative Pricing Observation

Without disclosing confidential commercial details publicly, EcoEco has observed pricing scenarios where:

• complete imported finished windows
• incorporating aluminium, glass, hardware, fabrication, freight, and assembly

have been commercially available at approximately the same pricing level as locally supplied aluminium component systems alone.

Confidential comparative commercial examples supporting these observations can be provided to the Commission upon request, subject to appropriate confidential treatment procedures.

3. Rebuttal — Applicants (Ventora / AGWA)

The Applicants and closely aligned entities participate directly within supply-chain structures that materially influence downstream pricing outcomes.

The Commission should therefore distinguish carefully between injury attributed to allegedly dumped or subsidised imports and commercial pressure arising from increased pricing transparency, direct-import competition, and compression of established domestic system-supplier and fabricator supply-chain pricing structures.

The Commission should carefully examine benchmark-linked landed aluminium cost, upstream margin layering, profile-system dependence, and whether anti-dumping measures would materially preserve existing domestic supply-chain pricing structures independent of alleged dumping effects.

4. Rebuttal — Capral and Upstream Aluminium Suppliers

Submissions from upstream aluminium and extrusion participants should be assessed in the context of their direct commercial exposure to extrusion margins, profile supply pricing, domestic conversion pricing, fabrication network dependence, and protection from direct benchmark-linked import competition.

The observed pricing disparity between direct-import finished windows and commonly observed Australian component pricing appears highly relevant to this analysis.

To the extent domestic pricing structures substantially exceed benchmark-linked commodity economics, the Commission should carefully distinguish between injury arising from unfair trade conduct and commercial pressure arising from increasing pricing transparency and direct-import competition.

5. Rebuttal — Proprietary System Suppliers

System suppliers frequently operate within structures involving proprietary profile dependence, restricted sourcing flexibility, switching barriers, upstream margin embedding, and controlled downstream distribution pathways.

The Commission should distinguish carefully between injury caused by dumping and commercial pressure arising from increasing access to direct-import pathways and benchmark-linked supply alternatives.

To the extent proprietary systems provide genuine technical, operational, architectural, or commercial advantages, such systems would reasonably be expected to remain competitive under ordinary market conditions without reliance upon restricted sourcing structures or protection from direct benchmark-linked competition.

6. Rebuttal — Reynaers, Thermceo and Premium System Participants

Premium-market participants naturally benefit from higher specification pricing, premium-margin structures, technical differentiation, and established distribution positioning.

However, preservation of premium positioning is not itself evidence of dumping injury.

The relevant commercial question remains:

How can complete imported finished windows be commercially supplied at approximately the same pricing level as commonly observed Australian aluminium component pricing alone?

That pricing relationship appears to warrant careful causation analysis before conclusions are reached regarding the source of the alleged injury.

7. Rebuttal — Coordinated Fabricator Support Letters

The large volume of downstream support letters should not automatically be interpreted as independent proof of dumping causation.

Many such submissions appear focused primarily upon price pressure, reduced margin, loss of work, and reduced competitiveness without materially analysing benchmark-linked aluminium economics, upstream margin layering, direct-import alternatives, or domestic pricing architecture.

Accordingly, such submissions may establish the existence of commercial pressure without necessarily establishing the cause of that pressure.

8. Alternative Causation Factors Requiring Examination

The Commission should carefully test whether the following factors materially contribute to the alleged injury indicators:

- upstream margin layering
- proprietary system lock-in
- restricted sourcing flexibility
- vertically integrated supply structures
- internal transfer pricing
- domestic resale margin structures
- distribution concentration
- profile-system dependence
- reduced access to benchmark-linked global supply

These factors may materially influence downstream pricing independently of dumping or subsidisation.

9. Evidentiary Position and Willingness to Cooperate

The undersigned is willing to cooperate further with the Commission and, subject to appropriate confidential treatment procedures, is willing to provide additional commercially sensitive material including:

- supplier invoices
- landed-cost calculations
- freight calculations
- benchmark pricing references
- comparative costing examples
- bill-of-material analyses
- related commercial documentation

The undersigned is also willing to provide confidential comparative commercial examples supporting the pricing observations referred to within this submission, subject to appropriate confidential treatment procedures.

The observations expressed within this submission arise from direct industry participation, importing, manufacturing, pricing exposure, and long-standing operational experience within the Australian window industry.

10. Conclusion

The principal weakness within many supporting submissions is the apparent assumption that commercial pressure experienced within portions of the Australian market necessarily establishes dumping causation.

The submissions generally appear to give limited consideration to benchmark-linked aluminium economics, upstream resale structures, internal margin layering, proprietary system dependence, restricted sourcing flexibility, direct-import pricing alternatives, and domestic supply-chain pricing architecture.

The undersigned respectfully submits that these alternative commercial explanations should be rigorously tested before any provisional or final measures are considered.

The observed commercial pricing relationships identified within this submission appear to warrant careful causation analysis before conclusions are reached regarding the source of the alleged injury.

Ed Stelling
EcoEco Windows & Doors Pty Ltd

Date: 17 May 2026