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SUPPLEMENTARY SUBMISSION IN SUPPORT OF A-TECH AUSTRALIA'S ORIGINAL SUBMISSION

Submission in Response to Anti-Dumping Notice No. 2025/115 – Investigation No. 691

Goods Involved: Aluminium Windows and Doors, Window Wall, Curtain Wall, and all Aluminium Façade elements.

Countries Involved: Australia and China

1. LODGEMENT DETAILS

To:

The Director – Investigations 1
Anti-Dumping Commission
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Australia
Email: investigations1@adcommission.gov.au

Submitted by:

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Date: 08/07/2026

2. INTRODUCTION

A-Tech Australia Pty Ltd respectfully submits this supplementary response in support of its original submission to Investigation No. 691.

The purpose of this supplementary submission is to address a fundamental issue which, in A-Tech's respectful view, is central to the proper determination of this investigation. The Applicants' submissions proceed on the basis that the Australian aluminium windows and doors industry constitutes a single, homogeneous market. Respectfully, A-Tech submits that this assumption does not accurately reflect the structure of the Australian construction and façade industry.

The Australian aluminium glazing industry comprises distinct market sectors operating under materially different regulatory frameworks, engineering requirements, procurement methodologies, compliance obligations and commercial delivery models. These differences are not merely operational; they define separate industries with different participants, technical capabilities, contractual responsibilities and competitive dynamics.

Accordingly, A-Tech respectfully submits that the Commission should distinguish between the Class 1 residential window market and the engineered Class 2 and above façade sector, including Window Wall systems, when assessing **industry representation, material injury, product competition and the scope of any Anti-Dumping measures**.

Failure to recognise these distinctions risks treating fundamentally different sectors of the Australian construction industry as though they compete within the same commercial market, when in practice they operate under entirely different technical, regulatory and commercial conditions.

3. CLASS 1 AND CLASS 2 BUILDINGS REPRESENT DISTINCT INDUSTRY SECTORS

While both Class 1 and Class 2 developments incorporate aluminium windows and doors, they operate within fundamentally different technical, regulatory and commercial environments.

Class 1 developments comprise detached dwellings, duplexes, townhouses and low-rise residential housing. These projects generally utilise standardised window systems supplied through catalogue-based, distributor or retail channels. They are characterised by repetitive designs, standard product specifications and comparatively straightforward compliance requirements centred primarily on AS 2047 product certification.

A-Tech does not oppose the Commission's consideration of anti-dumping measures where they are appropriately directed towards imported standard residential window products competing within the Class 1 housing market. If the Commission determines that dumping has caused material injury within that market segment, appropriate remedies should be considered in accordance with the Customs Act.



Figure 1 Class 1 Typical 120 SQM Duplex

However, A-Tech respectfully submits that the engineered façade sector servicing Class 2 and above developments represents a fundamentally different industry and should not automatically be captured within the same scope.

Class 2 and above developments, including apartment buildings, mixed-use developments, commercial buildings and high-rise towers, require fully engineered façade systems rather than the simple supply of standard window products. These projects demand project-specific façade engineering, structural coordination, thermal and condensation modelling, National Construction Code compliance, AS/NZS 4284 façade performance testing where applicable, quality assurance systems, staged logistics, specialist installation, commissioning and certification.

Accordingly, the windows and doors supplied to these developments form part of an integrated building envelope designed to satisfy complex structural, thermal, acoustic, weatherproofing, fire safety and durability performance requirements. The value delivered extends well beyond manufacturing and includes engineering, design coordination, compliance management, logistics planning, project management, installation and long-term Australian warranty obligations.

For these reasons, Australian-controlled façade contractors operating within the Class 2 and above construction sector do not compete in the same commercial market as manufacturers supplying standard residential windows to the Class 1 housing sector. Although both industries utilise aluminium windows and doors, they operate under fundamentally different procurement models, regulatory obligations, technical requirements and commercial responsibilities.

Furthermore, Australia's current manufacturing capability does not have sufficient capacity to independently supply the volume and technical complexity of engineered façade systems required to support the nation's Class 2 residential construction pipeline. The hybrid supply model adopted by Australian façade contractors has therefore evolved not to circumvent Australian industry, but to address labour constraints, manufacturing capacity limitations and increasingly complex performance requirements imposed by the National Construction Code.



Figure 2 - Class 2 Window Wall Tower

This distinction is central to Investigation No. 691 and should be carefully considered when determining both the scope of the Australian industry represented by the Applicants and the application of any Anti-Dumping measures.

4. Conclusion

For the reasons outlined in this supplementary submission, A-Tech Australia Pty Ltd respectfully requests that the Commission:

- recognise that the Australian aluminium window and façade industry comprises multiple distinct market sectors rather than a single homogeneous industry;
- distinguish between manufacturers supplying standard residential windows to the Class 1 housing market and Australian-controlled façade contractors delivering engineered façade systems for Class 2 and above developments;
- carefully assess whether the Applicants adequately represent the engineered façade sector before making findings or recommendations that extend across the broader Australian industry; and
- ensure that any determination appropriately reflects the significant technical, regulatory, commercial and operational differences between these distinct market sectors.

A-Tech Australia remains committed to supporting Australian employment, strengthening local engineering capability, maintaining full compliance with Australian Standards and the National Construction Code, and delivering high-performance façade systems that contribute to Australia's housing, infrastructure and construction sectors.

A-Tech respectfully requests that the Commission give due consideration to these distinctions when determining Investigation No. 691, so that any measures adopted accurately reflect the structure of the Australian industry and do not unintentionally disadvantage Australian-controlled businesses that generate substantial Australian employment, engineering expertise, compliance capability and long-term economic value while supporting the delivery of Australia's growing housing and infrastructure needs.

Signed:

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Contact Person: Charlie Ibrahim

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