

GRIMMOND CONSTRUCTION

NON-CONFIDENTIAL PUBLIC SUBMISSION

22 October 2026 | Investigation 691 — Aluminium windows and doors from China

To: Director – Investigations 1, Australian Trade Remedies Commission

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From: Nathan Grimmond, Director, Grimmond Construction

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Role: Australian construction business / downstream end user (not claiming to be an exporter or producer)

1. Purpose of this submission

Grimmond Construction is a Gold Coast-based builder delivering high-end residential construction in South East Queensland. We submit these comments in response to the Statement of Essential Facts (SEF 691, EPR 501, dated 14 October 2026). We ask the Commission to fully examine the consequences of proposed measures for downstream builders and purchasers, especially where specialised architectural aluminium window and door systems are involved. These are industry observations, not claims that Grimmond has established a particular dumping margin or verified market-wide cost impact.

2. Downstream construction costs and project viability

Aluminium window and door packages can be significant project components, particularly in architecturally complex houses requiring large-format glazing, thermally efficient systems, bespoke finishes and engineered detailing. Additional duties may increase tender prices, reduce headroom within client budgets and add uncertainty to projects priced before the measures became known. For construction businesses operating within fixed budgets, cost escalation can also affect variations, value-engineering, procurement decisions and project commencement. We ask the Commission to examine evidence from builders and end users, not only the direct commercial interests of importers and domestic manufacturers.

3. Product substitutability and capacity

We ask the Commission to assess whether domestically supplied goods are genuinely substitutable for specialised imported systems across relevant product specifications, dimensions, thermal and acoustic performance, finishes, lead times and project quantities. A broad product classification may conceal important distinctions between standard domestic products and customised architectural systems. Where reliable evidence shows that an equivalent local supply is not commercially or technically available, the Commission should consider the relevant lawful exemption and scope mechanisms.

4. Proportionate, evidence-based measures

We recognise that Australian producers are entitled to fair competition and that proven dumping or subsidisation causing material injury can justify lawful trade remedies. Our concern is that remedies should not be broader or higher than supported by verified evidence. We request careful examination of exporter-specific findings, the injury and causation analysis, non-attribution of other drivers of domestic industry performance, and relevant product exclusions or exemptions. We do not advocate circumventing Australian trade law.

5. Consumer, compliance and delivery impacts

If landed procurement costs rise materially, the cost may ultimately be passed on to residential clients. Reduced availability of suitable systems can also affect lead times and project sequencing. Regardless of origin, all products installed in Australian buildings must meet applicable Australian building, glazing, wind-load, energy-efficiency and other relevant compliance requirements. Any assessment of alternative

supply should consider compliance and whole-of-project outcomes, not simply product purchase price.

6. Requested consideration

We respectfully request that the Commission: (a) examine and disclose, to the extent legally possible, the downstream construction impact of proposed measures; (b) meaningfully consider specialist product specifications and actual local substitutability; (c) apply exporter-specific and product-specific treatment where justified by the evidence and law; (d) explain how downstream construction evidence has been weighed in the final report; and (e) make available clear guidance to builders on scope, duty application and lawful exemption pathways.

7. Supporting evidence and limits

This submission is non-confidential and makes no quantified claim about Grimmond project procurement volumes, contract amounts or percentage cost increases. Such figures should not be inferred. Grimmond can consider supplying relevant anonymised project examples or quotations on request, subject to commercial confidentiality and availability. We respectfully ask that this submission be placed on the electronic public record for Investigation 691.

Yours faithfully,

Nathan Grimmond

Director | Grimmond Construction

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References: Australian Trade Remedies Commission, Investigation 691 case page; SEF 691 (EPR 501, 14 October 2026); TRN 2026/147 (EPR 502, 14 October 2026).