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Director, Investigations 1
Australian Trade Remedies Commission
By email: Investigations1@atrc.gov.au

Dear Director

Re: Investigation 691: Aluminium windows and doors exported from the People's Republic of China. Submission in response to Statement of Essential Facts 691. (Non-confidential version for the public record)

I'm Lachlan Macleod, Director at Turn Group, a builder. I make this submission in response to Statement of Essential Facts 691 (SEF 691) in Investigation 691, concerning aluminium windows and doors exported from the People's Republic of China. Aluminium windows and doors are a core input to the buildings we deliver. We build high end homes. Build costs arent stacking up at the moment without going to chinese windows and joinery/flooring

Interim securities have applied since 15 October 2026 to aluminium windows and doors from China entered for home consumption, at rates of 5.3% to 51.6% for selected exporters, 24.4% for residual exporters and 73.3% for uncooperative and all other exporters (SEF 691, p.12). I understand that the Commissioner's final report is due to the Minister by 16 December 2026. Measures of this scale on a core building input are extraordinary, and they have caused considerable disquiet across the building industry and among households trying to build or buy a home. In my view they are out of step with the open, competitive economy Australia has built over recent decades, and would sit more naturally in a far more closed era of trade policy. They are also causing severe disruption across existing contracts: builders, contractors and their clients who priced and signed work in good faith before 15 October 2026 now face a cost that was never in those contracts and cannot readily be passed on. I ask the Commission to consider the following matters before finalising its recommendations.

1. Nobody has weighed the public interest

SEF 691 states that "the broader public interest considerations have not been considered by the Commissioner in making their preliminary findings and recommendations set out in this SEF" (SEF p.60). When the Government declined a formal public interest test in 2011, it committed that reports to the Minister may include "the expected effect of any measures on market concentration and domestic prices" and that the agency "will also report on any claims regarding impacts on downstream industries" (Streamlining Australia's anti-dumping system, 2011, s6.2). Given the extraordinary scale of the proposed measures, and the considerable disquiet they have caused among those who build and buy homes, that assessment is in my view essential. I ask that the final report for Investigation 691 include that assessment, so the Minister has it before deciding.

2. It adds cost to every new home

The Commission's own analysis puts aluminium windows and doors at "approximately 5% to 7% of total construction costs for a typical 3 to 4 bedroom dwelling" (SEF p.60). I note the

Commissioner describes this as "a small share" and says the estimates "are not a basis on which to assess the overall cost impact of the proposed measures"; that is my concern, because no overall cost impact has been assessed. On simple illustrative arithmetic using the ABS average approval value of a new house in 2025-26 ($517,430), a 24.4% rise in window and door costs would add up to about $6,300 to $8,800 per home. Increases of that order, at a time of acute pressure on housing affordability, are a matter of serious and widely shared concern. That is an upper bound, not a forecast, and I ask that the final report assess the actual effect on dwelling costs.

I therefore ask the Commissioner to:

(a) include in the final report an assessment of the expected effect of measures on dwelling costs, downstream users and competition, so that the Minister can weigh the public interest;

(b) address the matters raised above before finalising the recommendations; and

(c) if measures are recommended, recommend proportionate forms of measure, an adequate transition period of at least 12 months before any final measures take full effect, and transitional treatment for orders and contracts committed before 15 October 2026, given the severe disruption the measures would otherwise cause across existing contracts.

These are my own views, based on my own experience. I have checked what I have written and I stand behind it. The facts I refer to come from SEF 691 and the other public sources cited.

Thank you for considering this submission.

Yours faithfully

Lachlan Macleod
Director, Turn Group