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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 Daniel Massad, Director at MASSCO PROJECTS PTY LTD, a property developer. I make this submission in response to SEF 691 in Investigation 691 (aluminium windows and doors exported from China). Window and door costs feed directly into the feasibility and budgets of the projects we deliver.

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. It works against innovation and productivity

The Productivity Commission has warned that long-standing anti-dumping measures "that become akin to tariffs are likely to lessen the imperative for recipient industries to respond to import competition through innovation and other forms of productivity improvement" (Inquiry Report No. 48, 2009, p.35). Its 2025 report found labour productivity in housing construction fell 12% between 1994-95 and 2022-23, while productivity across the economy rose 49%. I ask the Commission to consider these downstream productivity effects in its final report.

2. Inflation is already above target

The ABS producer price index for aluminium windows and doors used in house construction was 44.1% above its 2019 average in the June quarter 2026, and 5.1% higher than a year earlier (ABS 6427.0, Table 18). The ABS attributed the June quarter rise of 3.2% to "elevated aluminium and transportation costs". Those increases occurred before any securities applied. Adding a charge of this size to a core building input on top of those increases would be highly inflationary, at a time when inflation remains a pressing national concern. I ask the

Commission to take this price context into account in assessing the effect of measures on downstream users.

3. 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.

4. A percentage duty penalises energy-efficient windows

The Commission's Guidelines, quoted in SEF 691, warn that the ad valorem method "may not be the most appropriate duty method when applied to goods which may have high priced varieties or models of the goods" (SEF p.213). The SEF then finds "a wide range of high priced goods" and that "price variation is therefore considered high", yet proposes an ad valorem duty (SEF p.214) without explaining how that warning was addressed. A percentage duty takes the most dollars from the highest-specification products, such as the thermally broken and double-glazed units used to meet the NCC 2022 7-star energy-efficiency standard. I ask the Commission to consider a floor-price or combination method, or separate treatment of high-specification products.

5. 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.

For these reasons, I 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.

This submission sets out my own views and experience. I have reviewed the content and I am responsible for it. The facts I have cited are drawn from SEF 691 and other public sources as referenced.

I appreciate the Commission considering these points.

Yours sincerely

Daniel Massad
Director, MASSCO PROJECTS PTY LTD