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Mr David Latina, Commissioner
Australian Trade Remedies Commission
By email: investigations1@atrc.gov.au

Dear Commissioner,

RE: Investigation 691: Aluminium Windows and Doors from China - Submission in response to SEF 691 and PAD 691

Novus is an Australian residential developer and build-to-rent operator. We have a pipeline of 2,400 apartments scheduled for delivery over the next five years. Aluminium windows and doors are one of the largest trade packages in every building we deliver. We strongly oppose the proposed measures as they apply to Class 2 multi-residential apartment buildings, for the reasons below.

1. The National Housing Accord is already off track.
   The Federal Government's National Housing Accord targets 1.2 million new well-located homes over five years from mid-2024. The National Housing Supply and Affordability Council's August 2026 quarterly report shows only 308,000 homes completed since the Accord began, about one quarter of the target. Rising interest rates are lifting holding and finance costs. Rising fuel prices are lifting freight, materials and site costs. Many apartment projects are already at or below the feasibility hurdle lenders and investors require and therefore are not commencing or completing.

2. The duty lands directly on the cost of each home.
   Securities now apply from 15 October 2026 at effective rates of 5.3% to 73.3%, with 24.4% for residual exporters. Builders and developers have no margin to absorb this cost. It flows into the price or rent of each apartment, or it stops the project. On our current portfolio, the duty on imported window and façade packages adds approximately $3,500 per apartment at the 24.4% rate, or $8.35 million across our pipeline. At the 73.3% rate, this rises to $10,400 per apartment, or $25.1 million across our pipeline. This adds undue cost pressure to every new apartment.

3. Projects already contracted carry the risk now.
   The average construction program for a c.250 apartment development takes 3 years. Land purchases, head contracts and façade subcontracts were priced and financed on a basis that did not include these measures. The securities create immediate cost, dispute and funding risk between developers, builders and façade suppliers on homes already under construction. That risk alone delays delivery. If these measures go ahead, there must be a 24-month transitional period from the Minister's decision to allow the industry to adjust, with no retrospective measures imposed.

4. Supply cannot switch at the scale or speed required.
   Changing suppliers mid-project means redesign, new testing and recertification, longer lead times, and programme delays. Major apartment builders have already told the Commission that local manufacturers cannot yet meet multi-storey demand at the required scale, timeframe and specification.

Novus requests that:

- The Commissioner determines the six exemption requests within this investigation and recommends an exemption for window wall and engineered systems for Class 2 to 9 buildings where Australian industry does not offer like or directly competitive goods at the required scale.
- The decision to take securities in relation to the interim dumping duty and interim countervailing duty is rescinded immediately.
- In the final report, the Commissioner sets out the impact to housing supply evidence in full, so the Minister can weigh the public interest consideration when exercising the discretion under section 269TL not to impose measures.
- If measures are recommended, the Minister implements a transitional period of 24 months from the Minister's decision to allow the industry to adjust and for no retrospective measures to be imposed.

Every cost added to an apartment makes the National Housing Accord harder to reach. We would welcome the chance to provide the Commission with project-level cost data in confidence upon request.

Yours sincerely,



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