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The Director – Investigations 1
Australian Trade Remedies Commission
GPO Box 2013
Canberra ACT 2601

By email: investigations1@atrc.gov.au
Copy to: senator.ayres@aph.gov.au

Dear Madam or Sir

Investigation 691: Aluminium windows & doors from China

Submissions in response to Statement of Essential Facts and Preliminary Affirmative Decision

1 We act for Supaglass Industries Pty Ltd (**Supaglass**) and Astral Industries Pty Ltd, trading as Astral Windows (**Astral**) in relation to this matter.

2 Our clients submit that Investigation 691 should focus on low-cost commodity imports.

3 Value-driven, innovative products should be excluded from any anti-dumping measures. The Astral Ultra range,[1] designed and tested by Supaglass in Australia and for Australian conditions, is such a product.

4 Astral Ultra meets or outperforms every other thermally broken aluminium system on WERS. Supaglass submits the Astral Ultra range should be excluded from any anti-dumping measures.

Supaglass

5 Supaglass is a longstanding independent manufacturer of high quality, Australian-designed glass windows and doors. Since its foundation in 2011, Supaglass has worked with Australian builders and homeowners to develop high-performance engineered systems that meet Australia's demanding conditions.

6 Our clients do not import generic, commodity products. They import high performance, high quality and locally warranted windows and doors that use their own designs, dies, and branding, tested to AS2047 at realistic sizes.

7 Under the manufacturer identification of Supaglass, Astral has over 700 thermal simulations published on the Australian WERS database, using both double and triple

[1] Supaglass created Astral Windows. Astral Industries Pty Ltd is a separate company that holds the Astral brand and residential range.

glazed products. Supaglass carries the local warranties for the Astral Windows range, which includes Astral Plus, Astral Edge and Astral Ultra.

Astral Ultra

8 Following the introduction of the National Construction Code (**NCC**) 2022, which came into effect on 15 January 2024, Supaglass found that the required efficiency rating reports for Canberra-based projects were repeatedly specifying U-values below anything they could source or fabricate locally.

9 Supaglass observed a gap in the Australian market – their clients were frequently forced toward UPVC systems that demonstrated long-term durability concerns under Australian conditions. This did not represent an equitable or practical solution for most Australian homeowners or builders.

10 In response, Supaglass made a substantial financial and intellectual investment into the design, engineering, testing and ownership of the Astral Windows range.

11 Astral Ultra was purpose built to service the upper tier of residential performance demand, where locally manufactured alternatives are currently unable to achieve the required performance levels without becoming commercially prohibitive.

12 Astral Ultra is tested to AS2047 at full real-world sizes, and modelled and published on WERS. It launched in September 2025, before Investigation 691 was initiated in November 2025.

Submissions

13 Imposing dumping duty indiscriminately on high-performance and locally warranted window systems like Astral Ultra, along with low-cost, low performing commodity imports, damages Australian industry.

14 For the last 15 years, Supaglass has been a member of the Australian Glass and Window Association (**AGWA**), supporting the improvement and development of Australia's window manufacturing industry.

15 On 25 November 2025, the day that AGWA notified its members of Investigation 691, Supaglass wrote to AGWA's CEO. Supaglass explained that Investigation 691 should clearly distinguish between low-cost commodity imports and value-driven, innovative products that are designed for – and in – Australia.

16 That is so because innovative window systems like Astral Ultra are not being "dumped" on the Australian market, to the detriment of Australian industry. Rather, it is the opposite – the Australian market has lacked access to windows of this calibre and it is Australian businesses like Supaglass who are stepping in to fill the gap.

17 Yet, Investigation 691 does not recognise this distinction; the only carve-out is for curtain walls. A commodity single-glazed window, and a triple-glazed thermally broken system engineered to a U-value that no local manufacturer has matched, both fall inside the scope of the investigation on identical terms.

18 This oversight has unfortunately carried through into the Statement of Essential Facts (**SEF**).

19 The SEF claims that Ventora and a handful of other manufacturers represent the local industry and that the local industry produces identical or like goods (pages 83-84). The Preliminary Affirmative Decision (PAD) effectively concludes that Supaglass's suppliers are causing "material injury" to Ventora and these other local manufacturers.

20 This is simply untrue. Neither Ventora, nor any of the other local manufacturers identified in the SEF, can make Astral Ultra.

21 Supaglass has conducted an extensive survey of the Australian market for high-performance windows. Following contact with AGWA, Supaglass contacted all 14 known manufacturers of high-performance windows. None could substantiate a product matching Astral Ultra's performance. Currently, Astral Ultra meets or outperforms every other thermally broken aluminium system on WERS.

22 Our client's export partner, Shanghai Langtong Technology Co. Ltd (**SLT**), directly supports Australian-led research and development, and indirectly supports the construction industry by enabling Supaglass to supply an Australian-designed product that is otherwise unavailable locally.

23 Supaglass directly employs 18 staff at its fabrication facility in Beard, ACT, and forms part of a wider local aluminium window manufacturing industry which, as AGWA acknowledged in its application for the investigation, employs over 9,000 Australians and generates approximately $2.72 billion in local manufacturing revenue.

24 Investigation 691 should take into account real market conditions in Australia for window manufacturers. This has never been a clean domestic-versus-imported split – so a blanket goods description creates the same difficulty for a nuanced local fabricator like Supaglass as it does for commodity importers.

25 Indeed, the SEF implicitly accepts, at page 19, the challenges of calculating a dumping margin in circumstances where vastly different products are inappropriately considered together:

> *The commission notes that there is substantial variation in the prices of AWD exported to Australia, and this is primarily a result of differences in AWD project specifications.*

26 Our clients observe that other regulatory levers – like extending commercial-grade testing and certification to residential suppliers – might offer a more targeted response to address mass imports of low-quality products.

27 Investigation 691 should take into account relevant public policy considerations. The purpose of anti-dumping and countervailing measures is to protect Australian markets from injury caused by dumped or subsidised products. In this case, applying dumping duty to high-performance systems like Astral Ultra would harm the Australian market, by cutting off access to products designed and tested to meet Australian requirements and that are otherwise unavailable in Australia.

28 Our clients also observe that:

(a) It is unfair and unfounded to characterise our client's export partner SLT, as an "uncooperative exporter". SLT was genuinely unaware of Investigation 691 until after the Preliminary Affirmative Decision was published.

(b) SLT lacks any meaningful avenue for a prompt review of this status. An individual duty determination will require months of new trading data, without any guarantee of an accelerated pathway. Yet new exporters, without the same track record of supporting Australian business, will have immediate access to an accelerated review, and a determination made within 100 days.

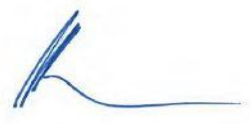
(c) Our clients' extrusion partner, Nanping Aluminium Co. (**Nanping**), offers a product with genuine environmental credentials. Nanping is a globally recognised and Aluminium Stewardship Initiative-certified producer, with verified production emissions of just 4–5kg CO_2e per kg of aluminium, compared to the global average of approximately 16kg CO_2e per kg. Nanping uses an in-house aluminium recycling facility producing extrusion from 80–100% recycled content with primary reliance on hydropower for production energy.

Next steps

29 Supaglass can provide further evidence to the ATRC in support of the above submissions if required, including manufacturer responses, energy assessment reports and test certificates.

30 Supaglass welcomes further engagement with the ATRC in relation to Investigation 691, including the opportunity to provide further submissions.

Yours faithfully



Andrew Hudson
Partner