SPECTIVE GROUP
info@SpectiveGroup.com.au
+61 3 9729 0411
3 Ramage St, Bayswater, VIC 3153
SpectiveGroup.com.au

Non-confidential submission

29 October 2026

Australian Trade Remedies Commission
Investigations 1
GPO Box 1632
Melbourne VIC 3001

Dear Commissioner

I am writing on behalf of Spective Group to express our support for the findings and proposed measures outlined in the Statement of Essential Facts for Case 691 concerning fully and partially fabricated aluminium windows and doors from China.

Spective is an Australian manufacturer operating primarily in the commercial construction market. From our 12,000m² facility in Bayswater, Victoria, we design, engineer, manufacture and deliver aluminium windows and doors and broader façade solutions for major commercial and institutional projects.

Our business model is different from a traditional window fabricator. Over many years we have deliberately built an integrated supply and delivery model that few businesses in our market can match. Our capability extends across design and engineering, windows and doors, and curtain wall, cladding, associated steelwork, installation, certification, maintenance and servicing. We also own a steel fabrication company and a structural engineering consultancy.

We have also made a deliberate decision to continue manufacturing in Australia. We source our aluminium extrusions locally and have invested substantially in manufacturing capability, engineering, testing and product development as well as engineering associated with our proprietary systems. An insight into the capabilities of Spective has been outlined in a separate confidential submission.

Despite Spective capability, we still see the effect of imported fabricated windows and doors in the commercial market.

I have been in this industry for a long time and have personally seen offshore window and door quotations at prices that are extremely difficult to reconcile with the underlying cost of the aluminium, glass, fabrication and freight required to produce and deliver the finished product. Even allowing for differences in labour costs and manufacturing methods, there are occasions where the numbers simply do not make commercial sense to me.

That has a real impact on Australian manufacturers.

Spective has responded by investing rather than retreating. We have broadened our capability and developed an integrated façade model that allows us to compete on engineering, project delivery, interfaces, compliance and accountability, rather than simply attempting to match the lowest price for a window delivered to site.

But the fact that we have adapted should not be taken as evidence that the Australian industry has not been injured. We have seen Australian manufacturers disappear from areas of the commercial market or move towards an import model.

I am not asking for Australian manufacturers to be protected from normal competition. Spective competes for major commercial projects every day. We must be productive, innovative and commercially competitive, and I expect nothing less.

SPECTIVE GROUP
info@SpectiveGroup.com.au
+61 3 9729 0411
3 Ramage St, Bayswater, VIC 3153
SpectiveGroup.com.au

What we cannot reasonably be expected to do is make long-term investments in Australian manufacturing, people, engineering and product development while competing against dumped or subsidised finished products.

That is why I support the Commission's findings in the SEF. Effective anti-dumping measures are not about shutting out imports or removing competition. They are about restoring a fair commercial basis on which Australian manufacturers can compete and make investment decisions with some confidence.

The findings in the SEF are an important step towards providing that confidence, and Spective supports the implementation of effective measures arising from Case 691.

We ask that the following points are considered.

We ask that the commission explains the Altop Façade Co findings. Were Altop's Australian export sales compared with its Chinese domestic sales of goods of the same specification (system type, glazing, finish, performance rating and Australian Standards compliance), or only with goods of the same general type? Aluminium windows and doors are frequently engineered for each project, so an average price across dissimilar goods is not a reliable comparison.

Circumvention. We ask the Commission to monitor shifts to third-country origins, partial assembly, importer duty absorption and re-description of goods, and to act promptly where they occur.

Long-term certainty. Our investment decisions are made over many years. We ask that the measures run for the full statutory period, and that continuation and review processes be managed to give lasting protection.

Yours sincerely

Hugh Lockie
Managing Director
Spective Group Pty Ltd