PUBLIC RECORD SUBMISSION

Investigation 691 — Aluminium windows and doors exported from the People's Republic of China

Response to Statement of Essential Facts | 2 November 2026

Submitted by: Park Cabins Pty Ltd, Somersby, New South Wales
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Status: Non-confidential submission suitable for publication on the Electronic Public Record

1. Executive summary

Park Cabins Pty Ltd is an Australian manufacturer of transportable homes, modular cabins and accommodation buildings. We ask the Commissioner to consider the effects of proposed measures on Australian downstream manufacturers that use imported aluminium windows and doors as components in buildings manufactured locally. We acknowledge the purpose of Australia's anti-dumping framework and do not dispute the importance of addressing proven injurious dumping. Our submission raises practical downstream impacts and requests careful consideration of product scope, domestic supply capacity, housing delivery, substitutability and appropriate lawful relief.

2. Business profile and exposure

Park Cabins manufactures buildings at Somersby, NSW, supporting an Australian workforce of approximately 30 workers and subcontractors (business estimate). Its buildings serve accommodation and other regional markets. The company sources finished window and door units from the Chinese supplier known commercially as Superhouse. Estimated annual procurement expenditure on these products is AUD $200,000. This is a management estimate, not an audited figure, and does not establish the customs value of goods within the investigation scope. Park Cabins has existing fixed-price contracts, under which unanticipated input-cost changes may not be recoverable from customers.

3. Illustrative financial sensitivity — not a duty assessment

The following scenarios apply hypothetical percentage increases to the entire estimated AUD $200,000 annual purchasing amount solely to show order of magnitude. Actual exposure depends on product coverage, exporter identity, customs valuation, exchange rates, applicable measures, and contractual/import arrangements. These figures are not asserted to be the applicable rates for Superhouse or the amount legally payable.

Illustrative rate	Indicative annual increase
5	AUD $10,000
25	AUD $50,000
50	AUD $100,000
75	AUD $150,000

Beyond direct costs, any cash security required on importation may affect working capital and the delivery of committed projects. No confidential margins, contract prices or customer details are disclosed in this public version.

4. Product performance and availability

Park Cabins selects window and door systems for a combination of attributes including double glazing, thermally broken frames, fit and finish, customised configurations, and features relevant to fire performance. Based on the company's procurement experience, some imported offerings are perceived to provide better overall suitability or availability than particular domestic alternatives. This is a statement of business experience, not a verified finding that

Chinese products outperform Australian products generally.

The company requests consideration of whether directly substitutable Australian-made products are reasonably available for the particular specifications required. Relevant evidence could include independent whole-window U-values and SHGC, AS 2047 testing, glazing and hardware schedules, fire-performance test reports or certifications where applicable, quotations, lead times and comparable domestic alternatives. No claim is made that all Superhouse products have a specific fire rating, or that double glazing or thermal breaks alone justify exclusion.

5. Competitive asymmetry with imported completed buildings

Park Cabins is concerned that imposing measures on separately imported components could increase costs for buildings manufactured in Australia, while completed modular buildings imported with windows already installed may be classified differently. This raises a potential competitive asymmetry between Australian assembly/manufacturing and overseas finished-building production. The actual tariff treatment of completed imported buildings has not been established in this submission; Park Cabins requests that the Commission clarify the relevant product scope and consider this issue to the extent permitted by the statutory investigation framework.

6. Domestic supply capacity, housing affordability and delivery timeframes

Park Cabins requests consideration of whether Australian window and door manufacturing capacity is sufficient to meet demand from downstream builders if imports of relevant products become materially more expensive. The question is not only whether an Australian-made window exists, but whether equivalent double-glazed, thermally broken, custom-sized or specialised systems can be supplied in the quantities and timeframes required for modular construction. Park Cabins does not currently have verified industry-wide capacity or lead-time data and does not assert that a national supply shortage has been established.

If domestic suppliers cannot meet additional demand promptly, manufacturers may face longer procurement lead times, redesign or requalification requirements, disrupted production schedules and delays in delivering finished buildings. Even where substitutes are available, higher input costs may be passed through into future tender prices and ultimately borne by developers, housing providers, purchasers or residents. On fixed-price projects, costs may instead be absorbed by Australian manufacturers or affect project feasibility. These are potential effects requiring evidence and assessment, not quantified or proven consequences of the measures.

In the context of Australia’s housing supply and affordability pressures, modular and prefabricated construction can contribute to faster delivery of accommodation. Park Cabins therefore asks that the Commission, within its statutory remit, consider evidence on domestic supply capability, actual lead times, price differences and downstream delivery impacts, and refer any broader housing-policy implications to the appropriate government decision-makers.

7. Existing contracts and broader consequences

Fixed-price contracts were agreed before the current cost implications were fully known. Unrecoverable cost increases may affect delivery budgets, project scheduling and future tender pricing. In regional accommodation and housing projects, higher construction input costs may ultimately be passed on to purchasers or reduce project feasibility. These are foreseeable commercial risks, not quantified industry-wide findings.

8. Requests to the Commissioner

• Consider evidence of downstream effects on Australian modular and prefabricated building manufacturers within the Commissioner’s statutory remit.

• Assess, to the extent relevant and legally permissible, whether domestic manufacturers can supply technically comparable products in sufficient quantities and within commercially workable lead times, and the implications for housing cost and delivery.

• Clarify the treatment of completed imported modular buildings compared with separately imported window and door assemblies, including any relevant scope distinctions.

• Explain available pathways and evidentiary requirements for product-specific exclusions or exemptions where equivalent Australian-made goods are not reasonably available.

• Consider, where legally available, transitional treatment for goods already ordered and fixed-price contracts entered into before provisional measures.

• Confirm the process for providing supplementary technical and commercially confidential material, with a corresponding public version.

9. Conclusion

Park Cabins supports fair competition and Australian manufacturing. It asks that the Commission carefully consider whether the proposed measures, as applied to relevant products, could unintentionally disadvantage Australian businesses that manufacture complete buildings domestically using imported components, increase end-user costs or slow housing delivery. Park Cabins is willing to provide further supporting evidence and requests that this submission be placed on the public Electronic Public Record for Investigation 691.

Lucas Baker
Director, Park Cabins Pty Ltd
2 November 2026

Public sources

Australian Trade Remedies Commission, Investigation 691 Electronic Public Record: https://www.industry.gov.au/australian-trade-remedies-commission/current-cases-and-electronic-public-record-epr/691

ATRC, How to lodge a submission in response to an anti-dumping or countervailing case: https://www.industry.gov.au/australian-trade-remedies-commission/how-lodge-submission-response-anti-dumping-or-countervailing-case