MLWindows

NEWPORT, VIC 3015
ABN 92 654 782 395

Submission in Response to Statement of Essential Facts

Investigation No. 691 – Aluminium Windows and Doors from China

Submitted by: ML Group Holdings Pty Ltd, trading as ML Windows
Date: 02/11/2026
Contact: Lulu Zhang, Director
Email: m@mlwindows.com.au

1. Introduction and purpose of submission

ML Windows is a Melbourne-based Australian business established in 2019. We specialise in supplying custom-made, high-performance European-style windows and doors to Australian homeowners, boutique builders and architects.

We respectfully request that the Australian Trade Remedies Commission consider **excluding high-performance thermally broken aluminium-framed windows and doors** from the scope of the proposed anti-dumping and countervailing measures, where these products can be demonstrated to be technically distinct from, and not suitably substitutable with, conventional aluminium window and door products.

Our concern is that applying the proposed measures indiscriminately to products with substantially different thermal performance, construction and functionality could restrict access to specialised products that contribute to Australia's residential energy-efficiency objectives.

2. Technical differences and product performance

The products supplied by ML Windows are designed around European window systems and high-performance building requirements. They incorporate features that distinguish them from many conventional aluminium window and door products available in the Australian market.

In particular, our products include:

- Thermally broken aluminium frames designed to reduce heat transfer through the frame.
- Double and triple glazing options, including Low-E glass and argon gas configurations.
- European-style opening systems, including tilt and turn, lift and slide and high-performance hinged systems with multiple locking points.
- Configurations designed to achieve improved thermal insulation, airtightness and weather performance.

- Selected product systems with relevant high-performance and Passive House-related certifications.

The following table summarises the key differences. We will provide supporting technical specifications and product documentation where available.

Comparison	ML Windows products	Conventional products
Frame construction	Thermally broken aluminium frames with min. 110mm depth and an aluminium wall thickness of 1.8mm+. These are substantial, almost structural windows that do not need reveals to maintain structural integrity.	Many standard systems use non-thermally broken frames. Most Australian windows need a timber / MDF reveals to obtain rigidity.
Glazing	Double and triple glazing; Toughened glass, Low-E, argon gas fill as standard. IGU thickness is commonly 30mm	Often single or standard double glazing, with configuration varying by supplier. IGU thickness is less than 20mm
Thermal performance	Designed for high thermal insulation and reduced heat transfer.	Performance varies; many standard systems have more limited thermal specifications
Opening systems	European tilt and turn, awning with a handle instead of a winder, specialised hinged systems with German brand handles	Commonly sliding, awning systems with winders
Airtightness and weather performance	Multiple locking points, engineered for high-performance building applications	Varies by product and system
Intended market	Energy efficient renovations, architect designed homes and high performance new builds including Passive House.	Broad residential and general construction market

Note: These are general market distinctions, not claims that every Australian-made product has the same specifications. We recommend assessing comparable products using actual technical data, including whole-window U-values, SHGC, air infiltration and relevant test results.

These are not simply alternative designs of conventional aluminium windows. Their construction, specifications and intended performance can be materially different and is reflected in its higher costs.

Our imported product acquisition cost, plus international shipping, local transport and Australian operation cost is above the conventional locally manufactured products. Our typical consumer selling price is more than the conventional locally manufactured products.

Our products are positioned in a specialised, higher-performance market segment. We do not primarily compete with conventional products on price. Customers generally select our products because of their technical specifications, European-style functionality, energy performance and design options.

We therefore ask the Commission to carefully consider whether these specialised products compete directly with the products causing injury to Australian manufacturers, and whether they should be treated as part of the same product category for the purposes of the proposed measures.

We request that the Commission assess these products as a distinct product category rather than treating all aluminium-framed windows and doors as directly interchangeable.

4. Contribution to residential energy efficiency

Australia's National Construction Code 2022 introduced a minimum 7-star NatHERS thermal performance requirement for new homes under the relevant compliance pathway.

High-performance windows and doors can play an important role in improving a home's thermal envelope and helping homeowners and builders achieve energy-efficiency targets.

Thermally broken frames, suitable glazing configurations and improved airtightness can help reduce unwanted heat transfer and improve indoor comfort. These features are particularly relevant to homes seeking higher energy performance.

We are concerned that additional duties on these specialised products may increase costs and discourage their use, potentially limiting Australian consumers' choice and access to products that support more energy-efficient housing.

We recognise that NatHERS assesses the performance of the whole dwelling, rather than certifying individual windows. Our submission is that these products can make a meaningful contribution to achieving the required whole-home performance.

5. Our request to the Commission

ML Windows respectfully requests that the Commission:

1. Consider excluding high-performance thermally broken aluminium-framed windows and doors from the scope of the proposed anti-dumping and countervailing measures, where their technical characteristics and market position distinguish them from conventional aluminium window and door products.
2. Assess the technical differences between thermally broken and non-thermally broken products, including frame construction, glazing configurations, thermal performance and intended applications.
3. Consider the availability of suitably equivalent Australian products and whether these specialised imported products are directly competitive with the products covered by the investigation.
4. Consider the potential impact of applying additional duties to specialised products that support improved residential energy efficiency.

We appreciate the Commission's consideration of this submission. We support fair trade and the Australian manufacturing industry but believe that specialised high-performance products should be assessed on their technical characteristics and actual competitive relationship with locally manufactured products.

If a broader product exclusion is not considered appropriate or legally available, we ask the Commission to advise whether a clearly defined product-specific exclusion or exemption mechanism may be available.

Yours faithfully,



Lulu Zhang
Director | **ML Windows**
m@mlwindows.com.au
0400770757