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

By email: investigations1@atrc.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 AET Group Pty Ltd (**AET**) in relation to this matter.

2 AET Group is an Australian business operating in the commercial aluminium window, door and façade industry.

3 Although AET is a small company, employing 6 people at its Airport West premises, AET prides itself on offering customised windows and facades for unique commercial projects across Melbourne, Queensland and Western Australia.

4 For over 13 years, AET has successfully competed with large, vertically integrated suppliers by offering a combination of service ethic and specialist expertise. AET has worked hard to establish relationships with major builders, developers and construction professionals.

5 AET operate exclusively in the commercial construction sector, working with Tier 1 and Tier 2 builders on substantial building projects. This has included landmark projects in Melbourne's CBD, such as the Rialto Tower refurbishment and residential apartments at 17 Spring Street.

6 Although AET's products are manufactured overseas, its business operations are based in Australia and are undertaken to support Australian construction projects. AET is not simply importing finished products for resale – it is an active participant in the Australian industry, undertaking significant contractual responsibilities and commercial risks associated with major building projects.

7 However, AET's future is in question, following the ATRC's Preliminary Affirmative Decision of 14 October 2026 (**PAD**) to impose dumping duties (with less than 24 hours' notice) on products that are the foundation of AET's business.

8 AET strongly disputes the Commission's finding, in the Statement of Essential Facts dated 14 October 2026 (**SEF**), that the goods it imports are being "dumped" onto the Australian market, to the detriment of local industry. It also rejects the proposition that any benefits provided by the Chinese government are to be considered as "subsidies" to support the imposition of countervailing duties.

9 AET's business forms part of the local aluminium window and door industry which, as was acknowledged in the application for this investigation, employs thousands of Australians.

10 AET is staffed by specialists in the design and engineering of windows, not lawyers or international trade experts. Although aware of Investigation 691 prior to the publication of the SEF, our client believed that if the ATRC or Investigation 691 required information from AET, then AET would be contacted directly.

11 The decision to require a security in lieu of payment while the PAD is in place has introduced a significant contingent liability to our client's balance sheet. It has also increased the administrative burden on industry, licensed customs brokers and the Australian Border Force – which is now required to process a significant volume of security requests.

12 AET further submits that, rather than protecting Australian industry, the imposition of dumping duty will result in lost Australian jobs and revenue. The proposed measures are a blunt instrument whose effects will go beyond any likely support to the Australian industry.

13 The market for aluminium windows and doors will be controlled by large, vertically integrated suppliers in a heavily consolidated market. Small, "challenger" businesses like our client will be forced out of the market. It is the selected exporters in China who have received favourable rates under the PAD, and exporters in third counties, who will benefit. The "protections" sought by the imposition of measures in the PAD are likely to be illusory as many suppliers and their customers will move to third countries.

14 Our client urges the ATRC to reconsider the findings of the SEF, taking into account the significant negative impacts on Australian business that will flow from the proposed measures. Those consequential effects will be adverse to other Australian businesses relying on imported product.

15 Further, the breadth of the "goods under consideration" is likely to cause downstream supply problems for the Australian construction industry, as sophisticated, imported products that are not readily available from Australian manufacturers, will be subjected to prohibitive additional measures.

16 Our client welcomes further engagement with the ATRC in relation to Investigation 691, including the opportunity to provide further submissions.

Yours faithfully



Andrew Hudson
Partner