ARCHITECTURAL WINDOW SYSTEMS PTY LTD

02/11/2026

Mr David Latina
Commissioner, Australian Trade Remedies Commission
Attention: The Director – Investigations 1 / Case Manager, Investigation 691
GPO Box 2013, Canberra ACT 2601
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Investigation 691 – Aluminium windows and doors exported from the People's Republic of China: submission by Architectural Window Systems Pty Ltd in response to Statement of Essential Facts 691 and in reply to submissions lodged after its publication

Dear Commissioner,

Executive summary

- AWS thanks the Commissioner and the staff of the Anti-Dumping Commission, now the Australian Trade Remedies Commission, for the preliminary findings in SEF 691 and for the preliminary affirmative determination and securities that apply from 15 October 2026. AWS supports these findings and asks the Commissioner to confirm them in the final report.
- The findings restore a fair and even playing field. That protects Australian manufacturing jobs, the independent fabricators who depend on them, and the investment that pays for local design, testing and innovation.
- Some submissions say that Australia does not make slim-profile sliders and that there is a "functional gap" in the market. That is not correct. AWS designs, tests and supplies the UltraEDGE™ slimline suite. AWS began designing it in 2023, after years of feedback from builders and architects about imported systems, and not in response to any submission in this investigation. Other Australian industry submissions (EPR 418 and EPR 420) confirm that slimline systems are made and supplied locally.
- AWS designs and supplies fit-for-purpose windows and doors for every NCC building class, from Class 1a to Class 10a, not only for houses or low-rise apartments. This supports the Commission's finding that the Australian industry is not confined to Class 1 buildings.
- Several submissions lodged after the SEF rest on statements that are incomplete or that the record does not support. AWS responds to the claims, not to the parties who made them, using the public record and published data.
- An importer's communication circulated to builders by email in October 2026 makes claims about the timing of securities, per-home costs, inflation, 7-star compliance and local capability. Section 7 sets out what the record shows. Securities were a published, foreseeable and interim step. The per-home figures assume the top rate applies to the full installed value of a wholly imported window package, which the record does not support. Australian industry makes the high-performance windows and doors that 7-star homes use.
- **Confidentiality:** this document is for the public record and contains no confidential information.

1. Introduction and interest of AWS

1.1 Architectural Window Systems Pty Ltd (**AWS**) is an Australian designer and supplier of aluminium window and door systems. For more than three decades, AWS has designed, tested and supplied Australian-made systems under the Vantage®, Elevate™, ThermalHEART™ and, now, UltraEDGE™ brands. They are supplied to a national network of more than 200 independent fabricators, most of them family-owned, as AWS set out in its initial submission (EPR 152). These fabricators manufacture finished windows and doors in metropolitan, regional and remote communities in every state and territory. AWS is an interested party to this investigation.

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1.2 AWS made an initial submission supporting the application by Ventora Group Pty Ltd and the Australian Glass and Window Association.[1] This submission builds on it. It (a) responds to SEF 691; (b) replies to submissions placed on the public record after SEF 691 was published (EPR 503 to 515, as at 27 October 2026); (c) addresses the exemption requests listed in Table 10 of the SEF, insofar as they rely on claims about slimline products or building classes; and (d) responds to claims circulating in industry communications since the SEF. Opposing submissions are referred to by EPR number only. AWS addresses their claims and intends no criticism of any business.

2. The Commission's preliminary findings

2.1 AWS acknowledges the work of the Commissioner and the case team. The investigation began under the Anti-Dumping Commission and continues under the Australian Trade Remedies Commission, the name the Commission has used since 29 September 2026.[2] The record runs to more than 500 documents, and the investigation has drawn a high level of cooperation from exporters, importers, end users and Australian industry. AWS appreciates the care with which the Commission has tested competing claims.

2.2 AWS notes in particular the following preliminary findings:[3]

- the goods were dumped by all exporters from China except one selected exporter, and the dumped and subsidised exports caused material injury to the Australian industry;
- locally produced aluminium windows and doors are like goods, and the Australian industry produces and supplies across all market segments;
- the evidence does not establish that the Australian industry is confined to Class 1 buildings or lacks the capability to supply Class 2 to Class 9 buildings; and
- securities apply from 15 October 2026 at effective rates of 5.3% to 51.6% for the selected cooperating exporters, 24.4% for residual exporters, and 73.3% (70.4% interim dumping duty plus 2.9% interim countervailing duty) for uncooperative and all other exporters.

2.3 AWS welcomes these findings and supports the proposed recommendation that dumping and countervailing duty notices be published. They do not shield Australian manufacturers from competition. They correct a price disadvantage that dumping created. With the measures in place, Australian businesses can compete on quality, compliance, performance, service and price. This helps secure future employment in Australian manufacturing, in extrusion, finishing and glass processing, and across the fabrication and installation businesses AWS supplies. It also preserves the scale needed to keep investing in local design, testing and innovation. AWS recognises that these findings are preliminary. It respectfully asks the Commissioner to confirm them in the final report due by 16 December 2026.

2.4 AWS's architectural specification team works on the specification of significant projects across Australia, and sees the systems, sizes and performance levels being specified and supplied. From that vantage point, AWS respectfully observes that some of the preliminary margins, and in particular the negative margin of 47.4% found for one selected exporter,[4] do not sit easily with AWS's understanding of the market segments in which that exporter's goods compete, or of the suppliers to those segments. AWS does not have access to the confidential calculations and makes no allegation about any party. It respectfully asks the Commissioner, before finalising the low and nil margins, to confirm that the export prices and normal values were compared on a genuinely like-for-like basis. That means goods of comparable specification, including system type, glazing, thermal performance, size, and project-specific engineering and testing, with adjustments under section 269TAC(8) where specifications differ.[5] A comparison weighted towards a different product or project mix could understate the margin, and with it the protection that the measures are intended to provide.

[1] EPR 152 (AWS): letter dated 8 December 2025 signed by Greg Taylor, Executive General Manager, listed in SEF 691 Non-Confidential Attachment 1 (p. 235) as received 11 December 2025.
[2] SEF 691 (EPR 501), 14 October 2026, p. 10, footnote 1.
[3] SEF 691 (EPR 501), 14 October 2026, section 1.2 and Table 1, pp. 10–12; pp. 14–15; section 4.7.3, pp. 100–102; EPR 502 (TRN 2026/147).
[4] SEF 691 (EPR 501), 14 October 2026, Table 2, p. 16; Table 12, p. 129; section 6.5.4, p. 137.
[5] Customs Act 1901 (Cth), ss 269TAC(2)(c) and 269TAC(8); SEF 691 (EPR 501), 14 October 2026, section 6.5, pp. 134–137.

3. Points from AWS's initial submission that remain relevant

3.1 In EPR 152 AWS described the effects of dumped imports that it had seen directly: aggressive undercutting on large tenders and volume-housing contracts; margins squeezed to unsustainable levels; loss of the scale needed to keep in-house testing, product development and training; and less capacity for family businesses to invest, hire and train apprentices. The SEF's findings are consistent with that assertion. They include the finding that purchasing is driven mainly by quotations and tenders in which price is a significant factor, and the observation that industry members reported idle equipment, deferred investment and underused capacity during the injury period.[6]

3.2 Since EPR 152 was lodged, AWS has observed the effect described there spreading. Pricing pressure that AWS first saw most acutely on large tenders and multi-residential work is now being felt in detached housing, by fabricators supplying individual homes and volume builders in capital cities and in regional centres alike. The SEF's analysis is consistent with that observation. The Commission found undercutting across building classes 1, 2, 3, 5, 6, 7 and 9, with half of all quotes and tenders undercut by 30% or more and residential quotes undercut by between 5% and 64%. It concluded that competition from imported products "is not limited to a single market segment or building class".[7] It also found that the Australian industry's market share declined year on year from FY2022 to FY2025 while imports from China rose.[8] For AWS's fabricator network, which supplies metropolitan, regional and remote communities in every state and territory, harm in the detached-housing segment reaches well beyond the capital cities.

3.3 EPR 152 also described the regulatory and sustainability framework that Australian system suppliers operate within, and invest to meet. It includes the NCC, AS 2047, AS 1288, AFRC/WERS energy ratings, and bushfire and acoustic requirements. AWS also sources 100% of its extrusion from billet produced by ASI-certified suppliers, the overwhelming majority below 8 t CO_2e/t Al.

3.4 AWS notes that the Commissioner has not relied on allegations of non-compliance with Australian Standards in making the preliminary findings.[9] AWS accepts that position and makes no compliance allegation against any party in this submission. AWS refers to testing and design for Australian conditions for a different reason. Those matters go directly to like goods, substitutability and the Australian industry's capability, which several post-SEF submissions continue to dispute.

4. Australia designs and manufactures slimline windows and doors

4.1 **The claim.** An importer's submission states that "Domestic manufacturers do not produce comparable slim-profile architectural sliders", and that there is "a clear 'functional gap' in the Australian market as domestic manufacturers do not currently produce comparable slim-profile architectural sliders". On that basis it seeks an exemption for an imported "ultra-slim" slider range, a request that remains to be decided.[10] Since the SEF, another importer has submitted that slim-frame sliding doors and thermally broken systems are not necessarily offered by many Australian manufacturers,[11] and a builder has submitted that imported systems "are not truly 'like goods'".[12]

4.2 **The facts.** AWS designs, tests and supplies the UltraEDGE™ slimline suite of sliding and awning windows and sliding doors through its Australian fabricator network. The suite has interlocks of 15 mm on the windows and 24 mm on the doors, and door panels up to 4,000 mm high, and is published as tested and certified to AS 2047.[13] It is a direct Australian-made alternative to the imported "ultra-slim" sliders described in EPR 397. Together, the UltraEDGE™

[6] SEF 691 (EPR 501), 14 October 2026, p. 15 and p. 101.
[7] SEF 691 (EPR 501), 14 October 2026, section 9.6.1, pp. 190–191.
[8] SEF 691 (EPR 501), 14 October 2026, section 8.4.2, Figure 16, p. 174.
[9] SEF 691 (EPR 501), 14 October 2026, section 3.9, pp. 81–82.
[10] EPR 397, paras 3.3(d), 3.12 and 3.13; SEF 691 (EPR 501), 14 October 2026, section 3.7 and Table 10, pp. 74–76.
[11] EPR 503.
[12] EPR 504.
[13] AWS product pages at awsaustralia.com.au/product/ (UltraEDGE Series 472, 672, 476, 676, 704 UE and 704FBR UE) and product sheets at specifyaws.com.au, accessed 27 October 2026.

suites give Australian architects and builders a large range of slimline window and door suites designed for Australian conditions.

4.3 **UltraEDGE™ is not a response to submissions in this investigation.** AWS began designing the suite in 2023, well before this investigation began on 25 November 2025. The design responded to years of feedback from builders and architects across the country about imported slimline systems. They raised concerns about whether those systems suited Australian wind, water, bushfire and coastal exposure; a lack of testing to Australian Standards across the configurations supplied; very long supply lead times; a lack of servicing and maintenance support after installation; and difficulty obtaining replacement parts.

4.4 AWS designed UltraEDGE™ for Australian conditions, taking account of known weaknesses in other systems, particularly Chinese and European systems not developed for those conditions. AWS's Head of Product Design has said publicly that a system developed for Europe "may have been designed around different climates, construction methods, regulatory requirements, glass specifications and installation practices". In his words, its performance under Australian conditions "should be properly assessed rather than assumed".[14] That is the gap UltraEDGE™ was designed to close.

4.5 **Other Australian manufacturers confirm the same.** One Australian manufacturer states that it "has been fully manufacturing and supplying its own locally produced slim profile architectural sliders for this Australian market segment since 2008", across more than 3,000 projects, and that there is no "functional gap".[15] Another Australian supplier states that its slimline systems, among others, are delivered through Australian fabricators "across the full spectrum of building types", including towers of up to 55 storeys.[16] The SEF records these submissions, together with others from Australian industry.[17]

4.6 EPR 397 also submits that Low-E glass, argon-filled IGUs and thermally broken frames set the imported products apart from "standard" Australian suites.[18] Australian systems are available with those features. One example is AWS's ThermalHEART™ Series 731 thermally broken sliding door(since 2007), which accepts IGUs up to 32 mm, has a published Uw range of 2.1 to 5.2 W/m²K, and is tested and certified to AS 2047 and BAL-40. Like or directly competitive goods are therefore offered for sale in Australia. AWS respectfully submits that the exemption sought in EPR 397 should not be granted. If it is considered further, AWS asks to be consulted and will provide technical data.

5. AWS supplies all building classes, not only Class 1 or low-rise Class 2

5.1 **The claim.** Several submissions say that the Australian industry primarily supplies Class 1 buildings and cannot meaningfully supply Class 2 and above. One exporter's submission, as summarised in the SEF, states that "Class 2 buildings and above do not materially overlap with the market segment Australian industry operates within". Submissions from an industry association and a property developer make similar points. Two exemption requests are framed around Class 2 and larger buildings.[19] After the SEF, an end user supported one of those requests. It said that "no Australian producer tendered for or offered to supply the façade doors for its Class 2 and Class 3 buildings".[20] As explained in paragraph 6.1, Australian producers were not invited to tender for that work.

5.2 **The facts.** The Commission has already found that the evidence does not support this proposition. AWS adds its own evidence. AWS designs and supplies windows and doors for every NCC building class, from Class 1a through to Class 10a. Class 10 is outside the scope of this investigation, so it is mentioned only for completeness.[21] Each system is designed for, and fit for, the structural, weather, acoustic, thermal, bushfire and accessibility requirements of the

[14] ArchiPro, 'The art and engineering of minimalist windows', 7 October 2026.
[15] EPR 420, paras 1.2, 1.4, 1.6 and 2.1.
[16] EPR 418.
[17] SEF 691 (EPR 501), 14 October 2026, pp. 98–99.
[18] EPR 397, paras 3.3(b)–(c), 3.9–3.10 and 4.5.
[19] SEF 691 (EPR 501), 14 October 2026, section 4.7.1, pp. 94–97 (EPR 446, 423, 436 and 272); Table 10, p. 76 (EPR 434, 446 and 449).
[20] EPR 506, para 6.1.
[21] SEF 691 (EPR 501), 14 October 2026, Table 11, p. 105.

buildings it is used in. As stated in EPR 152, the AWS network already supplies detached housing, townhouses, mid-rise and high-rise residential, mixed-use developments, public and institutional buildings, commercial fit-outs and complex façades.

5.3 A building's class does not determine what kind of window or door it needs. The specification follows from the design wind pressure, water resistance, glazing, acoustic, thermal and bushfire requirements of the site. Australian system suppliers design and test their suites against exactly those requirements. An exemption defined by building class or by gross floor area would remove a large part of the market in which AWS and its fabricators compete. That would be inconsistent with the Commission's finding that imported and locally produced goods compete in all segments.

5.4 AWS supports one of Australia's largest networks of independent, mostly family-owned fabricators, more than 200 businesses in every state and territory.[22] Many supply Class 2 to Class 9 buildings every day, including apartments, aged care, schools, hospitals and commercial buildings. For these businesses creating installed window wall outcomes from the installation of windows and doors is a very regular accrescent a sideline or a different stand along product. Fabricators in our network have told us plainly that the installation of windows and doors to form a window wall is so commonplace they would not have a viable business if projects including window walls were somehow excluded. The assertion that the Australian industry operates only in Class 1 buildings is therefore not correct, and the Commission has found as much.[23] AWS systems are designed to produce window and door products that are installed in Class 2 to Class 9 buildings, subject to the project specification for structural, weather, acoustic, thermal and fire performance.

5.5 Window wall is not a separate product. It is an installed outcome: aluminium windows and doors, fabricated from the same systems, assembled between floor slabs and joined with mullions, transoms and sub-frames. The Commission has preliminarily found that window wall is distinct from curtain wall, falls within the goods description and is like goods as it should. It also found that window wall is supplied within the Australian market and is not a separate market segment.[24] A post-SEF submission confirms the point. It describes "Window Wall Systems" made up of "individual factory-assembled window units" less than 3 metres high and 4 metres wide, "connected and installed on site" with project-specific mullions, subheads and subsills.[25] Those individual units are aluminium windows within the dimensions of the goods description. Joining them on site does not change what they are. AWS respectfully submits that the Commission should confirm its preliminary finding on window wall in the final report and we would be happy to show the commission how our products and systems come together to form compliant and adapt window wall outcomes.

5.6 Some submissions characterise products for larger buildings as "bespoke engineered systems" that the Australian industry cannot provide.[26] Responsiveness to project needs is a core part of how Australian system suppliers work. AWS regularly works with architects, builders, façade engineers and its fabricators on individual projects and on large Class 2 to Class 9 developments. Where a project calls for it, AWS adapts and develops products, including custom profiles, sub-frames, flashings and glazing configurations, to deliver the architect's and builder's design intent and to meet multi-storey, high-wind and high energy-performance requirements. As AWS's Head of Product Design said recently, large-format systems depend on "glass selection, sill support, drainage, structural fixing, installation tolerances and ongoing adjustment", all of which local engineering support addresses on each project.[27] Imported systems are offered as an alternative to that local support; they are not a substitute for it.

[22] EPR 152; see paragraph 1.1.
[23] SEF 691 (EPR 501), 14 October 2026, p. 15 and section 4.7.3, pp. 100–102.
[24] SEF 691 (EPR 501), 14 October 2026, section 3.8, pp. 76–81; section 4.6.1, pp. 89–91.
[25] EPR 514, section 4.
[26] SEF 691 (EPR 501), 14 October 2026, p. 58 (EPR 427) and pp. 95–97 (EPR 423, 436, 446 and others).
[27] ArchiPro, 'The art and engineering of minimalist windows', 7 October 2026 (archipro.com.au/article/the-art-and-engineering-of-minimalist-windows-architectural-window-systems).

6. Reply to other submissions lodged after the SEF

6.1 **An end user developing a resort project (EPR 506 and 507).** This submission seeks an exemption for thermally broken lift-and-slide doors with frames at least 150 mm deep and an ultimate pressure of at least ±5,000 Pa. It says the only Australian thermally broken lift-and-slide door it identified is rated to 3,000 Pa.[28] AWS respectfully notes the following:

(a) The submission states that it "did not invite Australian producers to tender for the Phase 1 doors". It then relies on the fact that "No Australian producer tendered, quoted or offered to supply" them. It also records that the doors have been bought from the overseas supplier since October 2024, before this investigation began.[29] The absence of a tender from Australian producers that were never invited to tender says little about whether like goods are available.

(b) The comparison relies on a review of "published technical data". The exemption description is "drawn so that it ... excludes every lift-and-slide or sliding door currently offered by the Australian industry".[30] Published brochures show standard tested configurations, not the limit of what Australian suppliers can engineer and test for a project. A description written around brochure data is not, by itself, evidence that like goods are unavailable on equal terms.

(c) The submission's own comparison table shows Australian commercial sliding doors tested to cyclonic pressures of up to 10,500 Pa.[31] Australian industry therefore already supplies doors engineered for Region C wind pressures, which is the very performance the exemption request relies on.

(d) The submission also supports "the application(s) in respect of European-style lift-and-slide ('Euro slider') systems".[32] The SEF records the slimline exemption request (EPR 397) as one for slim-line profiles, not lift-and-slide systems (Table 10). The two should not be conflated.

(e) If any exemption is considered, AWS asks that it be confined to objectively verifiable characteristics. It should be granted only after Australian system suppliers have been consulted, as the submission itself proposes.[33]

(f) More generally, AWS respectfully submits that no exemption request should be determined before the Commissioner's findings on like goods, the Australian industry's capability and market segmentation are settled in the final report.[34] Each request listed in Table 10 of the SEF, and each lodged since, depends on the premise that like or directly competitive goods are not offered for sale in Australia. That premise is the very matter the investigation is testing.[35] Deciding requests on a preliminary record would risk pre-empting those findings, and would invite further requests framed around the same contested claims. Where a request cannot be fully tested within this investigation, with Australian system suppliers given the opportunity to respond, AWS supports the Commission's stated approach of examining it in a separate exemption inquiry after the investigation concludes to avoid unnecessary delays to the relief the Australian industry so desperately needs.[36]

6.2 **A submission from a property development interest (EPR 513).** AWS respectfully offers the following corrections:

(a) The submission describes securities as "ranging from 24.4% ... up to 73.3%". That leaves out the selected exporters' rates of 5.3% to 51.6%, and the finding of no dumping for one selected exporter.[37]

(b) It asserts that "domestic thermally broken extrusion capacity is heavily bottlenecked", with local premiums of 40% to 65% and lead times of 14 to 22 weeks. No source is given for

[28] EPR 507, paras 6.1, 7.3.1 and 7.5.1.
[29] EPR 506, paras 3.5, 4.4 and 5.1; EPR 507, paras 7.4.1 and 7.6.1.
[30] EPR 507, paras 6.2 and 7.3.1.
[31] EPR 506, para 4.1; EPR 507, para 7.3.1.
[32] EPR 506, para 6.1.
[33] EPR 507, para 7.4.2.
[34] SEF 691 (EPR 501), 14 October 2026, section 1.2.5, p. 15; section 3.7, p. 75.
[35] Customs Tariff (Anti-Dumping) Act 1975 (Cth), ss 8(7) and 10(8); SEF 691 (EPR 501), 14 October 2026, Table 10, p. 76.
[36] SEF 691 (EPR 501), 14 October 2026, p. 15.
[37] SEF 691 (EPR 501), 14 October 2026, Table 1, p. 12.

these figures. The Commission's findings point the other way. It found that the lead applicant operated at about 80% capacity utilisation. It also found that most responding industry members reported available, underused or scalable capacity and could increase production without significant further capital investment. It concluded that "constraints on supply were not attributable to an inability to manufacture the goods, but rather that available manufacturing capacity was not being fully utilised".[38] On lead times, Australian industry evidence on the record points to local stock and local manufacture shortening lead times compared with imported supply.[39]

(c) It asserts that achieving 7-star compliance in Climate Zones 6, 7 and 8 "requires window system U-values (Uw) below 3.0 W/m²K". The NCC does not set that requirement. Part H6 of NCC 2022 Volume Two offers two Deemed-to-Satisfy pathways for a home's thermal performance. The first is an energy rating using house energy rating software under Specification 42, which is the 7-star NatHERS pathway. The second is the elemental provisions of the ABCB Housing Provisions, with external glazing and shading dealt with in Part 13.3. Under the rating pathway, the whole house is modelled and windows are one input, alongside orientation, glazed area, shading, insulation and construction. Under the elemental pathway, glazing is assessed against allowances that depend on glazed area, orientation and shading. Neither pathway sets a single maximum window Uw of 3.0. The 7-star requirement also does not apply uniformly across the country. NSW applies BASIX instead, the Northern Territory has limited its requirement to 5 stars, and Tasmania has not adopted the NCC 2022 housing energy-efficiency provisions.[40] Where high window performance is wanted, Australian thermally broken systems with published Uw values well below 3.0 W/m²K are available, as noted in paragraph 4.6.

(d) It says imported assemblies have saved homes $25,000 to $45,000. The Commission estimates that windows and doors make up about 5% to 7% of construction costs for a typical 3 to 4 bedroom home.[41] On that basis, another builder's submission calculates the entire window and door package for a $500,000 home at about $25,000 to $35,000.[42] The claimed saving would therefore equal or exceed the whole package.

(e) It predicts the collapse of installation businesses. However, the same builder's submission acknowledges that "Australian-made windows also require transport and installation. Work that shifts to those products is not automatically lost." The record also does not support its reference to "a small cartel of domestic manufacturers". It identifies the lead applicant, 25 supporting industry members and other producers.[43] AWS alone supplies more than 200 independent fabricators, who compete with one another.

6.3 **Submissions on product range and likeness (EPR 503 and 504).** One importer accepts that specialised products are not "completely unavailable in Australia". Its concern is that only a limited number of local suppliers offer thermally broken, slim-frame and large-format systems. AWS's ThermalHEART™, UltraEDGE™ and Elevate™ systems are each fabricated and sold by many independent, competing fabricators, alongside systems from other Australian suppliers. A builder states that imported systems "often outperformed the local options I was offered". That is an individual experience, and the Commission reached a different finding on likeness after examining the evidence as a whole. AWS leaves the remaining matters in these submissions to the Commission.

6.4 **A builder's submission on industry standing (EPR 509)** raises questions about how the Australian industry was identified. The Commission has addressed this.[44] AWS confirms that it is part of the Australian industry supporting the application. AWS can provide further information to assist the Commission if required. AWS makes no submission on EPR 505, 511, 512 or 515. AWS addresses EPR 514 at paragraph 5.5.

[38] SEF 691 (EPR 501), 14 October 2026, p. 101.
[39] EPR 420, para 1.8.
[40] NCC 2022 Volume Two, Part H6 (H6P1, H6D2 and explanatory information) and Specification 42; ABCB Housing Provisions, Part 13.3; ABCB, 'NCC 2022 state and territory adoption dates' (housing energy efficiency: ACT 15 January 2024; NSW enhanced BASIX 1 October 2023; Victoria and Queensland 1 May 2024; South Australia 1 October 2024; Western Australia 1 May 2025; NT limited to 5-star; Tasmania not adopted), ncc.abcb.gov.au, accessed 27 October 2026.
[41] SEF 691 (EPR 501), 14 October 2026, p. 60.
[42] EPR 508, sections 2 and 8.
[43] SEF 691 (EPR 501), 14 October 2026, p. 103.
[44] SEF 691 (EPR 501), 14 October 2026, section 4.3; EPR 450.

7. Claims circulating in industry communications

7.1 Since the SEF, an importer's communication has been circulated to builders by email in October 2026, urging them to write to the Minister and sign a petition. Because it may be reflected in submissions, AWS respectfully sets out what the record shows on its main claims.

7.2 **"No transition period".** The communication says securities arrived "overnight", with "no transition period and no carve-out for jobs you'd already quoted, signed and priced". Securities after a PAD are a standard, published step under the Customs Act. From day 60 of an investigation the Commissioner may make a PAD, and securities may then be taken under section 42 to prevent material injury while the investigation continues.[45] This investigation was public from 25 November 2025, and the published timeline showed a PAD could be made at any time from 27 January 2026, with the SEF due by 14 October 2026.[46] Importers therefore had close to eleven months' public notice that securities could apply. Securities are also interim: they are cancelled if no duty notice is published; otherwise they may be converted to interim duty at the final rate, never above the amount secured, and importers may seek a duty assessment and refund of any overpayment.[47]

7.3 **The per-home cost figures.** The communication says "most new (average $500k) homes face about $8,000 more, rising to about $26,500 at the top rate", and "up to $50k on every $1m build". These figures are not consistent with the record:

(a) Securities are calculated as a percentage of the export price of the imported goods, not of the installed price of a home's windows and doors.[48] Freight, installation, distribution margins and other Australian costs within the installed package do not attract it.

(b) The Commission estimates that windows and doors make up about 5% to 7% of construction costs for a typical 3 to 4 bedroom home, or about $25,000 to $35,000 on a $500,000 build.[49] Working backwards, $8,000 at 24.4% implies a dutiable value of about $32,800, and $26,500 at 73.3% implies about $36,200. Both treat the whole installed package, or more, as imported from China at an export price equal to its installed value. Even then, 73.3% of $35,000 is about $25,700, less than the $26,500 claimed. On a $1 million build, 73.3% of a 5% to 7% package ($50,000 to $70,000) is about $36,700 to $51,300, so $50,000 again assumes the full installed value attracts the top rate. Because the export price is only part of the installed value, the real figures would be lower still.

(c) Most homes do not use imported windows and doors. In the investigation period the Australian industry supplied the majority of the market and China supplied 19%.[50] Australian-made products attract no securities. For imports, the 73.3% rate applies only to uncooperative and all other exporters. The selected cooperating exporters face 5.3% to 51.6%, and one selected exporter was found not to be dumping and faces none.[51]

(d) The Commission has noted that windows and doors are "a small share of total housing and construction costs".[52] AWS does not suggest the measures have no cost, only that figures of the size claimed are not supported by the record.

7.4 **"Inflationary" and housing targets.** The communication calls the measures "inflationary" and notes the target of 1.2 million new homes. Dumping duties are not an arbitrary tax. They apply only where goods are found to be exported below normal value and to cause material injury, and they are set by reference to the margins found. Their purpose is to restore fair pricing. On supply, the Commission found that most responding industry members had available, underused or scalable capacity and could increase production without significant further capital

[45] Customs Act 1901 (Cth), ss 42 and 269TD; SEF 691 (EPR 501), 14 October 2026, section 13.1, p. 215.
[46] ATRC case page for Investigation 691 (key dates), accessed 27 October 2026; EPR 417 (ADN 2026/017); EPR 480 (ADN 2026/132).
[47] EPR 502 (TRN 2026/147); Australian Customs Dumping Notice 2012/02 (operation of securities); Customs Act 1901 (Cth), Part XVB, Division 4 (s 269UA).
[48] EPR 502, Table 2; SEF 691 (EPR 501), 14 October 2026, Table 30, pp. 215–216. The notice notes that the actual liability on a consignment may be higher than the effective rate due to a number of factors; the security is still worked out by reference to the export price.
[49] SEF 691 (EPR 501), 14 October 2026, p. 60; EPR 508, sections 2 and 8.
[50] SEF 691 (EPR 501), 14 October 2026, p. 16.
[51] SEF 691 (EPR 501), 14 October 2026, Table 1, p. 12; EPR 502, Table 2.
[52] SEF 691 (EPR 501), 14 October 2026, p. 60.

investment.[53] A viable Australian industry helps meet housing targets, because it keeps local supply, servicing, spare parts and jobs in place for the homes being built.

7.5 **"Majority of new homes windows can't even be made here".** The communication says that, "thanks to the NCC changes mandating 7 Star", new homes need "true fully Thermally Broken suites, Low E glass, super high performing windows & doors, that the local market can't cater to, at the sizes architects are drawing them in at". It suggests Australian products may suit only if windows are cut "to half the size". The record and published sources show otherwise:

(a) The NCC does not mandate thermally broken frames or a set window U-value. The 7-star NatHERS pathway is a whole-of-home rating in which windows are one input, an elemental pathway is also available, and the 7-star requirement does not apply uniformly across the states and territories (paragraph 6.2(c)).

(b) Australian thermally broken systems with published Uw values well below 3.0 W/m²K are designed, made and sold here (paragraph 4.6). Low-E double glazing is also processed in Australia. One Australian glass processor states that its double-glazed units, including Low-E units, "are made here in Australia using both local and imported components".[54]

(c) On size, UltraEDGE™ door panels reach 4,000 mm high and the suite is tested and certified to AS 2047 (paragraph 4.2). Other Australian manufacturers and suppliers make or supply slimline and large-format systems through Australian fabricators (paragraph 4.5). Architects do not need to halve window sizes to specify Australian-made products.

7.6 **Ownership and certification.** The communication states that the importer is Australian-owned, that its factory is "the only Australian-owned window factory in China", and that its products are "AS 2047 tested and AGWA accredited & audited". It concludes, "We did everything right". AWS does not question those statements and respects the investment they describe. They are not, however, relevant to whether goods are dumped. Dumping is assessed by comparing the export price of the goods with their normal value. Who owns the exporting factory, and whether the product is certified, does not change that comparison.[55]

7.7 **"Today it's windows. Tomorrow it's joinery, electrical or steel."** Measures can apply only to goods that are the subject of an application, and only after an investigation finds dumping or subsidisation causing material injury. Any other product would need its own application and investigation. The communication also says the Minister's office "is hearing from the people who want these duties". The process is open to every interested party. The SEF summarises submissions from importers, exporters, builders, developers, industry bodies and end users on costs, housing supply and the public interest,[56] and many of the submissions lodged since the SEF oppose the measures or seek exemptions. AWS respectfully submits that the outcome should continue to rest on the evidence.

8. Conclusion and requests

8.1 AWS respectfully asks the Commissioner to:

(a) confirm the preliminary findings in the final report and recommend that the Minister publish the dumping and countervailing duty notices proposed in SEF 691;

(b) decline the exemption requests for slim-profile sliders and those defined by building class or floor area, because like or directly competitive goods are offered for sale in Australia;

(c) ensure that any exemption is narrowly and objectively defined and is considered only after the final findings on like goods and capability are made, and after consulting Australian system suppliers, including AWS; and

(d) give weight to verified evidence on the record over unsourced assertions, including figures circulating outside the record.

[53] SEF 691 (EPR 501), 14 October 2026, p. 101.
[54] Viridian Glass, 'Loving Glass Series: Double glazing' and LightBridge™ product page, viridianglass.com, accessed 27 October 2026.
[55] Customs Act 1901 (Cth), ss 269TAB, 269TAC and 269TACB; SEF 691 (EPR 501), 14 October 2026, chapter 6.
[56] SEF 691 (EPR 501), 14 October 2026, section 2.4.12, pp. 55–60.

8.2 AWS would welcome a visit by the case team to its Prestons facility and will provide test reports, design records and technical data on request, on a confidential basis where appropriate. AWS thanks the Commission again for its careful and even-handed work. These findings give a fair and just basis for Australian manufacturing, and the people it employs, to keep competing and innovating.

Yours sincerely,



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