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NON-CONFIDENTIAL SUBMISSION / PUBLIC RECORD

Investigation No. 691

Aluminium Windows and Doors Exported from China
Submission in Response to the Statement of Essential Facts (SEF 691)

Date: 2 November 2026

To: The Director – Investigations 1, Australian Trade Remedies Commission

Address: GPO Box 2013, Canberra ACT 2601

Dear Commissioner,

1. Introduction

Iconic Windows is a Melbourne-based Australian business specialising in the supply, importation and installation of aluminium windows and doors for residential and commercial construction projects.

We operate a showroom and warehouse in Mulgrave, Victoria, and provide local services including technical consultation, design coordination, project management, warehousing, delivery, installation and after-sales support.

We appreciate the opportunity to provide our views in response to the Statement of Essential Facts (SEF) for Investigation No. 691.

Iconic Windows supports fair competition and recognises the importance of protecting Australian manufacturers from proven unfair trade practices.

However, we are concerned that the proposed measures, together with the interim securities already introduced, may have unintended consequences for legitimate Australian businesses and the broader construction industry.

In particular, we believe the Commission should carefully consider the impact of current construction market conditions, the commercial commitments of Australian importers and builders, and the actual competitive relationship between different window and door products.

Our submission is made solely from the perspective of Iconic Windows as an Australian business directly involved in the local building industry.

2. Broader Construction Market Conditions and Their Contribution to Industry Injury

One of our primary concerns is whether the current difficulties experienced by Australian window and door manufacturers have been sufficiently distinguished from the broader challenges affecting the Australian construction market.

The Australian housing and construction sectors have experienced significant pressures in recent years, including higher construction costs, financing pressures, affordability constraints and uncertainty surrounding new developments.

While market conditions vary between regions and building sectors, these factors can have a substantial influence on the number of projects proceeding and the purchasing decisions made by builders and property owners.

For example, the Australian Bureau of Statistics reported that seasonally adjusted dwelling approvals in Victoria fell by 28.9% in September 2026, compared with the previous month. National approvals increased over the same period, highlighting the uneven nature of construction activity across different markets.

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The Reserve Bank of Australia also reported that new dwelling construction prices were 5.3% higher over the year to June 2026, reflecting continuing cost pressures within the sector.

From our experience operating in the Melbourne market, construction activity and project affordability are significant factors affecting demand for windows and doors.

When the overall market for construction projects becomes constrained, both Australian manufacturers and importers may experience reduced business opportunities.

A decline in sales, profitability or market share among domestic manufacturers should therefore not automatically be attributed to competition from imported products without adequately examining the underlying market conditions.

We respectfully draw the Commission's attention to section 269TAE(2A) of the Customs Act 1901, which requires consideration of injury caused by factors other than dumped or subsidised imports, including contractions in demand and changes in consumption patterns.

Any injury attributable to such other factors must not be attributed to dumped or subsidised imports.

We are not suggesting that weaker construction demand necessarily explains all injury experienced by Australian manufacturers.

Rather, **we ask that the Commission clearly distinguish the effects of broader construction market conditions from any injury actually caused by dumped or subsidised imports.**

We believe this distinction is essential to ensuring that the final determination reflects the economic circumstances of the Australian window and door industry.

3. The Risk of Further Increasing Construction Costs

We are also concerned that substantial additional import costs may create further pressure on an already cost-sensitive construction industry.

Windows and doors are an essential component of residential and commercial buildings.

Where additional import costs are passed through the supply chain, they may increase the overall cost of construction.

For builders and property developers operating under tight budgets, even relatively modest additional costs can affect project feasibility, financing arrangements and investment decisions.

For homeowners, higher building costs may result in reduced project scope, delayed construction or decisions not to proceed.

This raises an important broader concern.

If construction costs continue to increase, fewer projects may become financially viable. Reduced construction activity would ultimately mean fewer orders for both Australian window and door manufacturers and importers.

In other words, measures intended to protect one part of the industry may, if their wider effects are not carefully considered, contribute to a self-defeating cycle:

Higher construction costs reduce project feasibility, fewer projects proceed, and the resulting reduction in demand affects manufacturers, suppliers, builders, installers and other Australian businesses.

This would not necessarily create a sustainable outcome for the domestic manufacturing industry.

We believe the long-term health of Australian window and door manufacturing depends not only on fair competition, but also on a strong and active construction market.

Protecting Australian manufacturing should not unintentionally contribute to reducing the overall demand for the very products that Australian manufacturers produce.

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We acknowledge that the Commission must make its determinations in accordance with the applicable legislation, and that broader downstream economic consequences do not replace the statutory injury test.

Nevertheless, we respectfully request that the Commission recognise these commercial risks when considering the causes of injury and explaining the implications of its findings.

4. Impact on Existing Contracts and Projects Already in Progress

A further immediate concern is the effect of interim securities on construction projects that were already contractually committed before the Preliminary Affirmative Determination (PAD) was announced on 14 October 2026.

In the aluminium window and door industry, the procurement process typically involves initial quotations, negotiation, deposit payments, preparation and approval of shop drawings, manufacturing, international shipping, customs clearance, delivery and installation.

Our normal manufacturing and delivery timeframe is approximately 10–12 weeks, and may be longer for complex or specially configured products.

Consequently, products arriving in Australia after the introduction of interim securities may relate to contracts entered into several months earlier.

In many construction projects, the contract price has already been agreed with the builder or property owner and cannot readily be renegotiated.

The date of importation does not necessarily reflect the date on which the commercial pricing and purchasing decision was made.

When additional import costs arise after the contract price has been fixed, Australian suppliers may have limited or no ability to recover those costs from their customers.

This can materially reduce the profitability of existing contracts and, depending on the original margin, potentially turn a viable project into a financial loss.

It is important to recognise that these losses would be borne by Australian businesses operating within the local construction industry.

We acknowledge that goods ordered or paid for before the PAD are not automatically exempt from interim securities under the current arrangements.

However, we respectfully request that the Commission consider whether any lawful transitional arrangements or other relief mechanisms may be available for genuine pre-existing contracts and procurement commitments.

Where such arrangements are not available under the relevant legislation, we request that the Commission clearly explain the applicable limitations and any existing avenues through which affected Australian businesses may seek appropriate relief.

We believe the financial consequences of sudden changes to import costs on genuine pre-existing contractual commitments deserve explicit consideration, rather than being treated solely as ordinary commercial risk.

5. Product Differences and Actual Competition with Australian Manufacturers

Aluminium windows and doors cover a broad range of products with significant differences in design, manufacturing complexity, performance and intended applications.

At Iconic Windows, we regularly supply products requiring project-specific dimensions, thermally broken aluminium frames, double glazing, specialised hardware, large glazing configurations and particular architectural requirements.

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The selection of a window or door system is not determined by price alone.

Factors such as wind-load performance, water resistance, thermal efficiency, acoustic performance, frame dimensions, hardware configuration, architectural appearance and delivery requirements can all influence the purchasing decision.

We recognise that Australian manufacturers produce many high-quality aluminium window and door systems, and that locally manufactured and imported products compete directly in numerous applications.

However, **the general ability to manufacture aluminium windows and doors does not necessarily mean that every product is commercially and technically interchangeable under the specific requirements of a construction project.**

For some projects, replacing a selected window or door system may require changes to shop drawings, engineering assessments, compliance documentation or building openings.

These changes can create additional costs and delays that may not be apparent from a simple comparison of product prices.

We therefore respectfully request that the Commission consider actual product specifications, technical substitutability, local manufacturing capability and practical delivery requirements when assessing competition between imported products and Australian-manufactured like goods.

We are not suggesting that a difference in technical specification automatically places a product outside the scope of the investigation.

Rather, we ask that relevant differences be properly considered when assessing actual competition, pricing effects and the causes of injury.

6. Contribution of Australian Importers and Installation Businesses

We believe it is important to recognise that importing aluminium windows and doors does not mean that all economic activity associated with those products occurs overseas.

Australian businesses such as Iconic Windows undertake substantial local responsibilities.

These include customer consultation, design coordination, technical support, warehousing, transport, site installation, quality control and after-sales service.

Such activities support employment and business opportunities for Australian workers, tradespeople, transport companies and building contractors.

Our customers include Australian builders and property owners who rely on suitable window and door systems to complete their construction projects.

A significant increase in import costs may therefore affect not only importing businesses but also the Australian companies and workers involved in the surrounding supply chain.

Potential consequences include reduced profitability, working capital pressure, delays to existing projects and reduced demand for related local services.

We are not suggesting that these downstream impacts should replace the statutory assessment of material injury to Australian producers of like goods.

However, we respectfully submit that **Australian importers and installation businesses are also part of Australia's construction economy, and the commercial consequences affecting them should not be overlooked.**

A sustainable construction industry requires viable businesses throughout the supply chain.

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7. Commercial Certainty and Implementation of Interim Securities

The introduction of interim securities has also created additional administrative and financial responsibilities for Australian importers.

Businesses must understand the applicable requirements, assess whether imported goods fall within the scope of the measures, coordinate customs clearance and arrange the required security.

For small and medium-sized businesses, unexpected security requirements may place significant pressure on working capital.

This is particularly challenging where funds have already been committed to manufacturing and existing customer contracts.

We respectfully request clear and consistent administrative guidance concerning the application of interim securities, the relevant export-date requirements, product classification, acceptable security arrangements and the reconciliation of securities following the final determination.

Greater certainty would assist Australian businesses in meeting their legal obligations while minimising unnecessary disruption to existing construction projects.

8. Our Requests to the Commission

In light of the above, Iconic Windows respectfully requests that the Commission address the following matters in its final report for Investigation No. 691:

1. **Broader construction market conditions** Explicitly assess the extent to which construction activity, financing pressures, affordability constraints, project feasibility and changes in demand may have contributed to injury experienced by Australian window and door manufacturers.
2. **Injury and causation** Clearly distinguish injury caused by dumped or subsidised imports from injury attributable to other market factors, consistent with the non-attribution requirements under section 269TAE(2A) of the Customs Act 1901.
3. **Impact of additional construction costs** Acknowledge the risk that further increases in construction costs may reduce project feasibility and ultimately affect demand for both Australian-manufactured and imported windows and doors.
4. **Existing contractual commitments** Consider the impact of interim securities on genuine fixed-price contracts and procurement commitments established before the PAD, and identify any lawful transitional or other relief arrangements available to affected businesses.
5. **Product competition and substitutability** Ensure that relevant technical specifications, actual market competition, local supply capability and project delivery requirements are appropriately considered when assessing injury and causation.
6. **Australian downstream businesses** Recognise the commercial activities and economic contributions of Australian importers, distributors, installers and other businesses supporting the domestic construction industry.
7. **Transparency and practical implementation** Provide clear explanations of the Commission's findings on these matters, including the applicable legal limitations and practical compliance requirements for Australian importers.

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9. Conclusion

Iconic Windows respects the role of the Australian Trade Remedies Commission and recognises the importance of maintaining fair competition in the Australian building products industry.

We also believe that the long-term sustainability of Australian manufacturing depends on the health of the broader construction market.

When the overall market becomes constrained, both domestic manufacturers and importers face fewer business opportunities. Increasing costs throughout the supply chain may place further pressure on construction activity and ultimately reduce demand for the entire industry.

It is therefore important that the causes of injury to Australian manufacturers be carefully examined, and that injury arising from broader economic and construction market conditions is not incorrectly attributed to imported products.

At the same time, the consequences of sudden additional import costs for Australian businesses with existing contractual commitments deserve appropriate consideration.

We are not asking the Commission to disregard proven unfair trade practices or the legitimate interests of Australian manufacturers.

We are asking for a balanced, evidence-based assessment that recognises the complexity of the Australian construction industry and the importance of maintaining a viable market for all businesses operating within it.

Ultimately, fair competition and a healthy construction market should work together to support a sustainable Australian building industry.

Thank you for considering our submission.

Yours faithfully,

Zack Zhao

For and on behalf of Iconic Windows

Public References

Australian Bureau of Statistics, Building Approvals, Australia, September 2026 (released 2 November 2026).
https://www.abs.gov.au/statistics/industry/building-and-construction/building-approvals-australia/sep-2026

Reserve Bank of Australia, Statement on Monetary Policy – August 2026, Economic Conditions.
https://www.rba.gov.au/publications/smp/2026/aug/economic-conditions.html

Customs Act 1901 (Cth), section 269TAE, particularly subsection 269TAE(2A).
https://www.legislation.gov.au/C1901A00006/latest/text