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2 November 2026

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

By email: investigations1@atrc.gov.au
Copy to: senator.ayres@aph.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 Pacific Windows Pty Ltd (**Pacific Windows**) in relation to this matter.

About Pacific Windows

2 Pacific Windows is an Australian window and façade supplier.

3 For over 10 years, Pacific Windows has partnered with selected Chinese exporters and the Australian construction industry to meet the growing demand for high-quality façade glazing across residential and commercial projects.

4 Pacific Windows supplies significant, large-scale projects with engineered façade glazing. [Redacted text] [Information about Pacific Windows' products and business operations]

5 [Redacted text] [Information about Pacific Windows' products and business operations]

6 [Redacted text] [Information about Pacific Windows' products and business operations]

7 [Redacted text] [Information about Pacific Windows' products and business operations]

General submissions on the SEF

8 However, Pacific Windows now faces an uncertain future, following the Commission's Preliminary Affirmative Decision of 14 October 2026 (**PAD**) to impose dumping duties (with less than 24 hours' notice) on a broad swathe of products, apparently now including those that are the foundation of our client's business.

9 Pacific Windows acknowledges the ATRC's role in protecting Australian industries from dumping, subsidization and other anti-competitive international trade measures.

10 However, Pacific Windows considers that the current Goods Description under Investigation 691 is so broad that the measures are likely to damage, not protect, Australian markets. Local jobs and revenue will be lost as small, community-focussed suppliers like our client are 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.

11 Our client disputes the finding of 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.

12 Our client contends the opposite is true. Pacific Windows forms part of the local aluminium window and doors industry which, as was acknowledged in the application[1] for this investigation, employs thousands of Australians.

13 [Redacted text] [Information about Pacific Windows' engagement with Investigation 691]

14 [Redacted text] [Information about Pacific Windows' engagement with Investigation 691]

15 The decision to require a security in lieu of payment while the PAD is in place has increased the administrative burden on our client, customs brokers and border agencies, while also introducing a significant contingent liability to our client's balance sheet.

Submissions on the description of goods under consideration

16 The breadth of the current Goods Description under Investigation 691 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.

17 Pacific Windows maintains its products – specialised façade systems – should be exempt from the measures. These systems are selected and developed in accordance with the architectural design, performance brief, structural requirements and construction methodology of each project.

18 Unlike standard residential window and door products, these façade systems are designed as components of a coordinated building envelope. Rather than being selected from standard product ranges, these systems are designed and fabricated to meet project-specific architectural, structural and performance requirements, forming part of the building's integrated façade. The distinction is not based solely on whether a project is commercial or residential, but on the technical characteristics and intended function of the products themselves.

19 Aluminium framing members, glazing assemblies and associated components are fabricated to suit the dimensions, geometry and performance requirements of each

[1] Until 2026, Pacific Windows was a member of one of the applicants for this investigation, the Australian Glass and Window Association (**AGWA**).

project, rather than produced as standard catalogue products. Fabrication, quality control and delivery are coordinated with the construction programme and approved shop drawings. Subsequent design changes may require revised engineering, fabrication documentation or replacement components.

20 These manufacturing characteristics demonstrate the project-specific nature of the products and their intended integration into the overall building façade system.

21 Our client's façade systems may comprise different assemblies, including curtain wall, window wall, faceted glazing and interconnected framing components, each with distinct structural arrangements and functional characteristics.

22 Pacific Windows notes that the published goods description under Investigation 691 specifies dimensional limits of up to and including 3.0 metres in height and 4.0 metres in width for window assemblies and partial assemblies, and 3.0 metres in height and 7.0 metres in width for door assemblies and partial assemblies.

23 In Pacific Windows' projects, certain architectural window assemblies are designed and manufactured with dimensions exceeding these limits, particularly where full-height glazing or larger structural openings are required. These dimensions are established through project-specific architectural and engineering requirements rather than standard product specifications.

24 Pacific Windows respectfully seeks clarification of the goods description in relation to such products, including the treatment of assemblies exceeding the specified dimensional limits. Our client considers that products (including assemblies) falling outside the defined dimensions should be distinguished from those expressly covered by the investigation, subject to verification of their actual imported configuration.

25 Pacific Windows can provide further project-specific drawings, engineering assessments and supporting documentation on a confidential basis, should the Commission require additional information to assess the matters raised.

26 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