Case 691 submission on aluminium windows and doors from China

Non-confidential submission dated 3 November 2026

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Purpose and request

I support the contribution that appropriately specified Chinese-made windows and doors can make to affordable Australian homes and other buildings. That contribution should be judged on the product delivered, the work required in Australia and the outcome for the purchaser. Safe products, reliable delivery and fair competition matter to everyone in the glazing industry.

I also understand why Australian fabricators want a fair opportunity to recover their costs, invest in equipment and employ skilled people. A workable approach must take their concerns seriously. My purpose is to make a practical case for well-controlled overseas procurement alongside a capable Australian manufacturing industry, rather than present a claim about the effect on my own business.

I ask the Commission to assess the evidence before it against the particular goods, project requirements and purchasing decisions it concerns. I do not ask it to disregard established dumping, subsidisation or injury because a buyer prefers a lower price. I ask that the response to those issues be no broader than the evidence and law support, and that the relevant distinctions between suppliers and products remain clear.

The wider housing and building policy questions are separate. I support a coordinated approach that improves local productivity and skills while retaining access to compliant imported systems where they offer a sound project outcome. My proposal for earlier verification of imported products is set out below as a policy recommendation, not a statement of an existing universal border requirement.

Perspective and interests

My perspective is that of an Australian working across Australian and Chinese industry. I have a commercial interest in overseas supply and do not claim to be a disinterested observer. I want that interest to be visible so that the evidence can be considered on its merits.

This submission offers qualitative observations and policy proposals based on the public sources listed below. It supplies no project comparison, factory-cost dataset, verified saving, capacity estimate or measured consumer pass-through. It does not establish that the Commission's preliminary findings are wrong.

Responding to the Statement of Essential Facts

The Statement of Essential Facts, SEF 691, preliminarily finds dumping and subsidisation by certain exporters and resulting material injury. It also finds available Australian capacity across building classes and recognises non-price purchasing factors. These are substantive findings to address, not issues the Commission has simply overlooked. [EPR 501, sections 1.1, 4.7 and 8.5.1, pp. 10, 94–102 and 175]

Procurement records can show what was required, what alternatives were genuinely available and why a buyer selected a particular supply arrangement. Those records should be tested against contrary evidence, including evidence from the Australian fabricator concerned. A lower quotation alone cannot establish that an advantage comes from production efficiency rather than the pricing or subsidy issues under investigation.

Compare offers for the same job

A meaningful comparison should start with the same drawings and revision, opening schedule, dimensions, configuration, performance requirements, screen and hardware interfaces, and quantities. It should record what each supplier actually included. A supply-only price cannot be compared directly with a package that includes design, testing, transport, installation, supervision or warranty service.

The comparison should also identify delivery terms, currency and quotation date, freight, insurance, applicable customs treatment, site handling and the costs of any redesign or additional verification. Different contractual risk allocations can change the apparent price advantage. Where a figure is an estimate, it should remain an estimate rather than become a reported project saving.

Distinguish capability from availability on a particular programme

The practical question is whether a supplier can provide the specified quantity and configuration within the project's required programme. That requires evidence of the enquiry, the response and the proposed delivery commitment. A supplier declining one enquiry would not establish that the Australian industry lacks capacity. A project that did not invite Australian bids cannot establish that Australian producers were unable or unwilling to quote.

Equally, a general description of a factory or product range does not settle whether a particular offer meets a particular programme. I would ask the Commission to consider a documented project constraint at that level, without extrapolating it into a claim of nationwide incapacity. Labels such as window wall and curtain wall should not replace examination of the actual system and the applicable goods description.

Explain the purchasing decision

The best evidence is a contemporaneous tender evaluation or procurement decision, supported by the offers and correspondence. It should show the relative importance of price, compliance, delivery, technical suitability and supplier performance. A later explanation prepared for this investigation is weaker if it cannot be reconciled with those records.

Where that evidence shows a reason other than import price materially affected an award, I ask that it be considered in the relevant competition and causation analysis. It should not be assumed to explain an industry's overall performance without a wider evidentiary basis.

Affordability and the wider Australian glazing industry

My position is that a well-managed Chinese supply option can be part of delivering a viable Australian building. It must be assessed on a comparable, compliant and delivered basis. A lower factory quotation alone is not enough to establish that outcome.

The cost chain needs to be visible. A difference in the window and door package price may be absorbed by the contractor, offset by additional costs, reflected in a variation or retained by the purchaser. It does not automatically become a lower sale price for a home. An affordability claim should identify who receives the saving, under what contract and at which stage. I do not put forward a national housing-cost estimate on the present evidence.

The same discipline should apply to delivery claims. A planned production date is not proof of completion, and a shipping estimate is not a site delivery commitment. Any claimed benefit should include design approval, testing, manufacture, transport, clearance and installation interfaces, together with the risks and costs when something goes wrong.

For the wider Australian glazing industry, I propose examining the whole package of work. Design coordination, engineering review, local handling, installation, commissioning, defect correction and service can have different providers and locations. The records should identify which Australian activities and businesses are supported by the actual arrangement. They should also identify local fabrication or component supply that the imported package replaces. I do not assume a net employment benefit or that all offshore procurement has the same Australian content.

Australian fabricators and competing evidence

Capral supports measures and reports confidential injury evidence. Reynaers disputes broad claims that Australian fabricators cannot supply sophisticated systems. Later fabricator and supplier submissions describe lost work and investment concerns, but some report future risks rather than direct import harm. Clearview expressly describes that distinction. These accounts deserve examination, not dismissal or treatment as independently verified nationwide findings. [EPR 479, p. 1; 418, p. 1; 532, pp. 1–2; 537, p. 1; 540, pp. 1–2; 544, pp. 1–3]

Strengthening Australian manufacturing capability

I support practical investment that helps Australian manufacturers compete through lower production costs and reliable delivery. Automation, more capable production equipment, better links between design and manufacture, and workforce training can all contribute. Support should be tied to measurable improvements in output, labour productivity, material use, rework and the ability to supply the systems and delivery programmes customers require. It should not be judged simply by whether selling prices rise.

The SEF acknowledges that genuine production efficiencies can contribute to overseas cost advantages, while maintaining its preliminary findings on dumping and injury. I ask that these effects be distinguished on the evidence. My proposal is to strengthen Australian manufacturing capability and competitiveness, without assuming that Australian firms have failed to modernise or that automation alone resolves the investigation. Any public support should be assessed against its costs and demonstrated results, including whether productivity gains benefit Australian builders and purchasers. [EPR 501, section 9.9.4, printed pp. 200–201]

Other participants raise affordability, specialist products and downstream effects. Novus's cost estimates remain party calculations; Supaglass offers supporting evidence for a claimed product gap; Tango raises cost and transition concerns. None establishes consumer pass-through or granted relief. GIW's recommendations overlap with matched procurement evidence and origin-neutral performance checks. I do not claim that this approach is unique or adopt these parties' claims as my evidence. [EPR 526, pp. 1–2; 530, pp. 1–4; 545, pp. 1–4; 546, pp. 1–3]

Manufacturing efficiency and further evidence

The Commission itself accepts that overseas manufacturers may have cost advantages from factors including productivity, automation, efficient processes and scale. It also maintains that cost pressures and legitimate efficiencies do not, by themselves, explain the price suppression and lost sales it attributes to dumping and subsidisation. Both parts of that preliminary assessment matter. I do not suggest that the SEF overlooked efficiency or that a lower factory cost disproves dumping. [EPR 501, section 9.9.4, printed pp. 200–201]

I estimate, based on my experience, that automation could reduce manufacturing costs by up to 30%. This is a potential saving I propose for testing, not a measured industry-wide result. I have not supplied a matched dataset to substantiate it.

I ask for an independent, like-for-like assessment of Australian and Chinese fabricators' manufacturing costs for comparable products and output. It should examine automation and manual processes, labour hours per unit, scale and capacity utilisation, material and energy costs, and consistent treatment of equipment and overheads. Freight, insurance and other delivery costs should be shown separately. This would help identify where investment could lower Australian unit costs and improve capability. A productivity comparison would inform this assessment, but would not by itself establish or disprove dumping.

I have not supplied those records or measured automation savings. A-Tech/AKJ also requests an opportunity to provide factory-cost records; its further submissions do not supply a comparative productivity study. [EPR 548, pp. 2–4; series EPR 548–555]

Further public submissions

Spective describes Australian investment and argues that remedies support investment confidence. Lux View supports measures and describes broad building-class capability. These party accounts do not quantify available capacity, but they caution against assuming that Australian manufacturers have failed to modernise. [EPR 547, pp. 1–2; 538, p. 1]

The eight A-Tech/AKJ papers request closer scrutiny of actual tender competition, system comparability, producer identity and injury attribution. They are a coordinated series, not eight independent confirmations. Their challenges do not establish an error in the SEF or a revised dumping margin. Yuanjiang separately challenges exporter-specific cost allocation and methodology; that is a request for reconsideration, not an accepted correction. [EPR 548–555; 557, pp. 1–16]

Aus Inventive Design and Park Cabins raise existing-contract and downstream-cost concerns. The ProCon customer account raises homeowner affordability. Their business accounts, estimates and scenarios are not my project evidence. Actual contract terms and cost recovery must be checked; none of these filings establishes consumer pass-through or grants transitional relief. [EPR 556, pp. 1–2; 558, pp. 1–2; 559, pp. 1–3]

Hickory reports that six Australian suppliers did not quote for a specified project. That calls for examination of the enquiries and responses, not a nationwide incapacity conclusion; its price alternatives and substitution delays include estimates. Award's WERS appendix counts listed configurations rather than sales or imported units. It does not establish import market share or universal compliance, and its dataset has not been reproduced in this review. [EPR 561, pp. 8–12; 562 WERS attachment, pp. 1–5]

I do not rely on the main submissions at EPR 521, 529, 560 or 562. The discussion of EPR 562 concerns its WERS appendix only. These public accounts have not been tested against the underlying confidential records.

Verify products before they reach the project

Affordability is not a reason to accept unsuitable windows or glazing. I support the same outcome for domestic and imported products: evidence that the actual supplied system is suitable for its intended use, with clear responsibility for installation and rectification.

Queensland's September 2026 imported-glazing guidance requires attention to the tested assembly, full reports and current evidence. Glass-only certification does not establish complete window or door performance. The guidance is Queensland-specific. It should not be presented as a universal Australian border approval scheme. [QBCC, Imported glazing windows and non conforming building products, pp. 1–2]

Recognised overseas testing can be relevant, but the laboratory's accreditation scope and the test's suitability for the Australian compliance pathway matter. A foreign-standard report is not automatically equivalent evidence. The adopted NCC edition, applicable standards, building class and project conditions must be checked by the appropriate qualified people. The ABCB handbook is guidance, not a substitute for the governing requirements. [QBCC, Imported building products tested outside Australia, pp. 1–2; ABCB, Evidence of suitability handbook, p. iii]

My proposed earlier verification process

I recommend a practical process that identifies documentation or product mismatches before shipment wherever possible, backed by risk-based entry checks. This would need to be designed with the relevant regulators and industry. I am not suggesting that a supplier declaration alone should be treated as government approval.

Before manufacture, the purchaser and responsible technical advisers should settle the project specification and the evidence needed for the chosen compliance pathway. The record should identify the system, profiles, glazing, hardware, seals and relevant dimensions, rather than rely on a product brochure or a generic description of a factory's capability.

Before shipment, the responsible parties should reconcile the manufactured goods with that approved basis. The proposed checks should link drawings and revisions to product identifiers, test or certification scope, inspection records and the packing or consignment record. Any substitution should have a recorded assessment and approval. The process should make clear who resolves a mismatch and whether the affected goods can proceed.

At entry and before installation, I favour proportionate checks directed at identified risks, including unreliable or inconsistent documents and unapproved changes. Regulators would need to determine the lawful powers, selection criteria and treatment of goods awaiting clarification. The process should give legitimate suppliers a clear route to correct deficiencies, rather than impose an unexplained blanket barrier.

This is a recommendation about assurance and accountability. It is not an allegation that all imported products fail compliance, an assurance about a named supplier or a substitute for the anti-dumping inquiry. Trade-remedy treatment and suitability for a building remain separate questions.

Requests for consideration

Within the Commission's statutory assessment, I ask that it:

1. Assess project evidence on a matched specification, scope, price and delivery basis, including the Australian alternatives actually sought and offered.
2. Explain how demonstrated product and procurement differences affect the relevant competition, injury and causation conclusions, without assuming that every difference establishes a separate market or exemption.
3. Consider evidenced alternative reasons for a purchasing decision and distinguish those from unsupported explanations prepared after the event.
4. Retain the distinctions supported by the evidence between exporters and products, and explain the applicable scope and lawful pathways clearly to downstream purchasers.

The SEF explains the limits of the Commission's role. I therefore present the following as broader policy proposals, not a request to invent a public-interest test within its statutory inquiry. [EPR 501, section 2.4.12, printed pp. 59–60]

I ask government to consider stronger preshipment verification and risk-based entry checks, supported by traceable project documentation and clear responsibilities. I also support practical measures to improve Australian manufacturing skills and productivity. Any consideration of housing or downstream effects should use real procurement and contract evidence, not assume automatic consumer pass-through.

My aim is a supply industry that contributes to affordable, safe Australian buildings. Australian fabrication and appropriately specified Chinese supply can both have a role. The task is to establish where each proposal delivers a genuine benefit, address demonstrated harm fairly and avoid claims that the available evidence cannot support.

Public source appendix

All EPR references below are to the Case 691 public record. Titles follow the register. Party submissions are attributed positions, not accepted Commission findings. Dates distinguish the document from its publication. SEF locators use printed page numbers; other locators use PDF pages. Only sources cited in this submission are listed. All cited material is already public. No additional evidence is attached.

EPR 418. Australian Industry - Reynaers Australia - Submission in response to claims made on Australia's capacity to meet demand

Dated 21 January 2026; published 3 February 2026. p. 1.

https://www.industry.gov.au/sites/default/files/adc/public-record/2026-02/691---418---australian-industry---reynaers-australia---submission-in-response-to-claims-made-on-australia-s-capacity-to-meet-demand_0.pdf

EPR 479. Australian Industry - Capral Limited - Submission on material injury and support for the investigation

Dated and published 9 September 2026. p. 1.

https://www.industry.gov.au/sites/default/files/adc/public-record/2026-09/691-479-submission-australian-industry-capral-limited-submission-on-material-injury-and-support-for-the-investigation-and-measures.pdf

EPR 501. Statement of Essential Facts - SEF 691

Dated and published 14 October 2026. Sections 1.1, 2.4.12, 4.7, 8.5.1 and 9.9.4; printed pp. 10, 59–60, 94–102, 175 and 200–201.

https://www.industry.gov.au/sites/default/files/atrc/public-record/2026-10/691-501-report-statement-of-essential-facts-sef-691.pdf

EPR 526. Residential developer - Novus - Submission in response to SEF 691

Dated 28 October 2026; published 30 October 2026. pp. 1–2.

https://www.industry.gov.au/sites/default/files/atrc/public-record/2026-10/691-526-submission-residential-developer-novus-submission-in-response-to-sef-691.pdf

EPR 530. Importer - Supaglass Industries Pty Ltd (Supaglass) and Astral Industries Pty Ltd - Submission in response to SEF 691

Dated 27 October 2026; published 30 October 2026. pp. 1–4.

https://www.industry.gov.au/sites/default/files/atrc/public-record/2026-10/691-530-submission-importer-supaglass-industries-pty-ltd-supaglass-and-astral-industries-pty-ltd-submission-in-response-to-sef-691.pdf

EPR 532. Australian Industry - Clearview Aluminium Windows and Doors - Response to SEF 691

Dated 23 October 2026; published 30 October 2026. pp. 1–2.

https://www.industry.gov.au/sites/default/files/atrc/public-record/2026-10/532-australian-industry-clearview-aluminum-windows-and-doors-response-to-sef-691.pdf

EPR 537. Australian Industry - Lifestyle Windows - Response to SEF 691

Dated 26 October 2026; published 30 October 2026. p. 1.

https://www.industry.gov.au/sites/default/files/atrc/public-record/2026-10/537-australian-industry-lifestyle-windows-response-to-sef-691.pdf

EPR 538. Australian Industry - Lux View Windows - Response to SEF 691

Dated 22 October 2026; published 30 October 2026. p. 1.

https://www.industry.gov.au/sites/default/files/atrc/public-record/2026-11/538-submission-australian-industry-lux-view-windows-response-to-sef-691.pdf

EPR 540. Australian Supplier - Alumach - Response to SEF 691

Dated 24 October 2026; published 30 October 2026. pp. 1–2.

https://www.industry.gov.au/sites/default/files/atrc/public-record/2026-10/540-australian-supplier-alumach-response-to-sef-691.pdf

EPR 544. Australian Supplier - Mecal - Response to SEF 691

Dated 26 October 2026; published 30 October 2026. pp. 1–3.

https://www.industry.gov.au/sites/default/files/atrc/public-record/2026-10/544-australian-supplier-mecal-response-to-sef-691.pdf

EPR 545. Consultant - GIW Environmental Solutions Pty Ltd - Response to SEF 691

Dated 29 October 2026; published 30 October 2026. pp. 1–4.

https://www.industry.gov.au/sites/default/files/atrc/public-record/2026-10/545-consultant-giw-environmental-solutions-pty-ltd-response-to-sef-691.pdf

EPR 546. Property Developer - Tango Property Group Pty Ltd - Response to SEF 691

Dated 26 October 2026; published 30 October 2026. pp. 1–3.

https://www.industry.gov.au/sites/default/files/atrc/public-record/2026-10/546-property-developer-tango-property-group-pty-ltd-response-to-sef-691.pdf

EPR 547. Australian Industry - Spective Group - Response to SEF 691

Dated 29 October 2026; published 2 November 2026. pp. 1–2.

https://www.industry.gov.au/sites/default/files/atrc/public-record/2026-11/547-submission-australian-industry-spective-group-response-to-sef-691.pdf

EPR 548. Joint Submission - A-Tech Australia and Guangdong AKJ - Response to SEF 691 - Causation

No separate document date visible; published 2 November 2026. Submission No. 1, pp. 2–4.

https://www.industry.gov.au/sites/default/files/atrc/public-record/2026-11/548-submission-joint-submission-a-tech-australia-and-guangdong-akj-response-to-sef-691-causation.pdf

EPR 549. Joint Submission - A-Tech Australia and Guangdong AKJ

No separate document date visible; published 2 November 2026. Submission No. 2, pp. 2–4.

https://www.industry.gov.au/sites/default/files/atrc/public-record/2026-11/549-submission-joint-submission-a-tech-australia-and-guangdong-akj-response-to-sef-691-causation.pdf

EPR 550. Joint Submission - A-Tech Australia and Guangdong AKJ

No separate document date visible; published 2 November 2026. Submission No. 3, pp. 2–3.

https://www.industry.gov.au/sites/default/files/atrc/public-record/2026-11/550-submission-joint-submission-a-tech-australia-and-guangdong-akj-response-to-sef-691-causation.pdf

EPR 551. Joint Submission - A-Tech Australia and Guangdong AKJ - Response to SEF 691 - Causation

No separate document date visible; published 2 November 2026. Submission No. 4, pp. 2–4.

https://www.industry.gov.au/sites/default/files/atrc/public-record/2026-11/551-submission-joint-submission-a-tech-australia-and-guangdong-akj-response-to-sef-691-causation.pdf

EPR 552. Joint Submission - A-Tech Australia and Guangdong AKJ - Response to SEF 691 - Causation

No separate document date visible; published 2 November 2026. Submission No. 5, pp. 2–4.

https://www.industry.gov.au/sites/default/files/atrc/public-record/2026-11/552-submission-joint-submission-a-tech-australia-and-guangdong-akj-response-to-sef-691-causation.pdf

EPR 553. Joint Submission - A-Tech Australia and Guangdong AKJ - Response to SEF 691 - Causation

No separate document date visible; published 2 November 2026. Submission No. 6, pp. 2–3.

https://www.industry.gov.au/sites/default/files/atrc/public-record/2026-11/553-submission-joint-submission-a-tech-australia-and-guangdong-akj-response-to-sef-691-causation.pdf

EPR 554. Joint Submission - A-Tech Australia and Guangdong AKJ - Response to SEF 691 - Causation

No separate document date visible; published 2 November 2026. Submission No. 7, pp. 2–3.

https://www.industry.gov.au/sites/default/files/atrc/public-record/2026-11/554-submission-joint-submission-a-tech-australia-and-guangdong-akj-response-to-sef-691-causation.pdf

EPR 555. Joint Submission - A-Tech Australia and Guangdong AKJ - Response to SEF 691 - Causation

No separate document date visible; published 2 November 2026. Submission No. 8, pp. 2–4.

https://www.industry.gov.au/sites/default/files/atrc/public-record/2026-11/555-submission-joint-submission-a-tech-australia-and-guangdong-akj-response-to-sef-691-causation.pdf

EPR 556. Construction Industry - Aus Inventive Design Pty Ltd - Response to SEF 691

Dated 27 October 2026; published 2 November 2026. pp. 1–2.

https://www.industry.gov.au/sites/default/files/atrc/public-record/2026-11/556-submission-construction-industry-aus-inventive-design-pty-ltd-response-to-sef-691.pdf

EPR 557. Exporter - Guangdong Yuanjiang Facade Co., Ltd. - Submission in response to SEF 691

Dated and published 2 November 2026. pp. 1–16.

https://www.industry.gov.au/sites/default/files/atrc/public-record/2026-11/557-submission-exporter-guangdong-yuanjiang-facade-co-ltd-submission-in-response-to-sef-691.pdf

EPR 558. End User - Customer of ProCon Materials - Submission in response to SEF 691

No document date visible; published 2 November 2026. pp. 1–2.

https://www.industry.gov.au/sites/default/files/atrc/public-record/2026-11/558-submission-end-user-customer-of-procon-materials-submission-in-response-to-sef-691.pdf

EPR 559. Importer - Park Cabins Pty Ltd - Submission response to SEF 691

Dated and published 2 November 2026. pp. 1–3.

https://www.industry.gov.au/sites/default/files/atrc/public-record/2026-11/559-submission-importer-park-cabins-pty-ltd-submission-response-to-sef-691.pdf

EPR 561. Building Industry - Hickory Group - Submission in response to SEF 691

Dated and published 2 November 2026. pp. 8–12.

https://www.industry.gov.au/sites/default/files/atrc/public-record/2026-11/561-submission-building-industry-hickory-group-submission-in-response-to-sef-691.pdf

EPR 562. Award Window Systems Pty Ltd - Non-Confidential Attachment WERS

No separate document date visible; source data accessed 23 October 2026; published 2 November 2026. pp. 1–5; this citation is to the separate WERS attachment, not the main submission.

https://www.industry.gov.au/sites/default/files/atrc/public-record/2026-11/562-submission-importer-award-window-systems-pty-ltd-non-confidential-attachment-wers.pdf

QBCC, Imported glazing windows and non conforming building products

Effective September 2026. pp. 1–2.

https://qbcc.qld.gov.au/sites/default/files/documents/guide-ncbp-imported-glazing-windows.pdf

QBCC, Imported building products tested outside Australia

Effective July 2024. pp. 1–2.

https://www.qbcc.qld.gov.au/sites/default/files/documents/guide-ncbp-imported-building-products-test-outside-aust.pdf

ABCB, Evidence of suitability handbook

September 2024; NCC 2022 version. p. iii. Provided by the Australian Building Codes Board under the CC BY 4.0 licence.

https://www.abcb.gov.au/sites/default/files/resources/2024/NCC%202022%20%20Evidence%20of%20suitability%20handbook.pdf