Submission in Response to Australian Industry Submissions – Investigation 691

Nov 3, 2026

PUBLIC VERSION

The Commissioner Australian Trade Remedies Commission By email: investigations1@atrc.gov.au

Dear Commissioner,

Investigation No. 691 – Aluminium windows and doors exported from the People's Republic of China – Submission in response to Australian industry submissions

Item	Detail
Lodged by	Eric Lambers, Pre Construction Manager
On behalf of	Balmain & Co Pty Ltd (ABN 71 613 663 817), Level 1, 168–174 Dorcas Street, South Melbourne VIC 3205
Contact	0491 227 269 · el@balmainandco.com.au
Role	Commercial builder and end user of imported aluminium windows and doors for NCC Class 2–9 projects
Related	Our submission of 21 October 2026 and our exemption application of [date]

We request that the Commissioner takes note that the majority of Australian Industry Submissions do not correlate with the Applicant's response in EPR-454.

Of the 24 Australian industry submissions we reviewed that support the proposed measures, only 2 come from window makers that appear able to supply a large-scale Class 2–9 project in Victoria: ODS and Spective Group. The others are component and machinery suppliers, residential companies, or low rise commercial fit-out contractors.

This does not demonstrate that the Australian industry is ready to supply large-scale commercial projects, which is what the applicants claim in EPR 691-454.

We ask the Commissioner to weigh these submissions by what each submitter actually makes and supplies, and to grant the Class 2–9 exemption we have sought under EPR-517.

1. Submissions reviewed

We reviewed the 24 most recent submissions and Australian market questionnaires from Australian industry participants that support the measures, EPR 691-465 to 691-544.

We drew on what each submission says about the submitter's products and customers, and on its published products and projects. We placed each submitter in one category:

- **Commercial – Victoria:** supplies large-scale commercial projects in Victoria.
- **Commercial – interstate only:** supplies commercial projects, but not in Victoria.
- **Residential / small commercial:** mainly houses, with some schools, public buildings or low-rise work.
- **Small commercial fit-out:** shop, factory and office fit-outs.
- **Residential:** houses and residential products only.
- **Secondary supplier:** machinery, hardware or chemicals; does not make windows.
- **Not relevant:** does not make windows or window components.

2. Findings

Only 2 of the 24 submissions (8%) come from producers that may be able to supply a large-scale Class 2–9 project in Victoria. Two more supply commercial projects, but only in Queensland or Western Australia. The other 20 come from residential makers, small fit-out businesses, component and machinery suppliers, and one business that does not make windows.

3. Submission-by-submission review

EPR	Respondent	What they supply	Category
465	Central Glass	SA residential and small commercial contractor	Residential / small commercial
466	Accent Windows	The questionnaire says it supplies residential windows only	Residential
467	Dowell Windows	Residential windows	Residential
468	G.James Glass & Aluminium	Commercial windows, Queensland only; does not supply Victoria	Commercial – interstate only
477	Taylors Windows	Residential, with some commercial fit-out works	Residential / small commercial
478	ODS	Commercial, Victoria. High-end fit-outs and one office building in Collingwood. Quote requested for our project; response awaited	Commercial – Victoria
481	Packers	Supply and install, Adelaide. Residential, plus school and public-space facades	Residential / small commercial

EPR	Respondent	What they supply	Category
482	LGA WA	Supply and install, WA. School and public-space facades; limited, basic apartment projects	Residential / small commercial
483	Spective Group	The most relevant contractor: several university and library-type public buildings. Some larger projects appear to have used imported windows (see section 4)	Commercial – Victoria
484	Com-Al	WA commercial facade contractor: shopping centres and civic buildings; no apartments listed	Commercial – interstate only
485	Tweed Coast Glass	Shower screens and residential windows	Residential
514	Auschem	Chemicals	Secondary supplier
531	Bryants	Residential windows and vehicle windscreens	Residential
532	Clearview	Residential and small fit-out, Tasmania	Residential
533	Crawford Glass & Aluminium	Residential windows	Residential
534	Custom Joinery	Does not make windows	Not relevant
535	Instyle	Factory and shop fit-outs	Small commercial fit-out
536	Jewel	Sashless windows	Residential
537	Lifestyle Windows	Residential and commercial fit-out	Small commercial fit-out
539	Perfect Windows and Doors	uPVC windows, which are not able to be used on larger Type A construction multi-storey commercial buildings	Residential
540	Alumach	Machinery	Secondary supplier
542	FSA	Door hardware	Secondary supplier
543	Goldco	Flyscreens	Residential
544	Mecal	Machinery	Secondary supplier

These submissions show genuine concern for Australian manufacturing jobs, which we share. But support for measures is not evidence of capacity. Most submitters make residential products,

components or machinery; none of them would supply our projects whether or not measures are imposed.

4. The two producers that may be able to supply: ODS and Spective Group

Two Victorian supporters of the measures could be able to supply a large-scale Class 2–9 project. Neither shows that the industry as a whole can meet the demand of this segment.

ODS (EPR 691-478). ODS supplies commercial windows in Victoria. Its published work is mainly high-end fit-outs and one office building in Collingwood; we found no multi-storey apartment project.

Spective Group (EPR 691-483). Spective has the most relevant projects of all the submitters, with several university and library-type public buildings. However, some of the larger residential projects that Spective list on their website – such as the curtain wall @ Iglu (Flagstaff) and Emporia (Prahran) – appear to have used imported windows or curtain wall; and it is suggested that Spective only did the podium levels of those projects. As it is an RDO lockdown weekend, I have been unable to verify this.

Two producers alone cannot serve the Victorian Class 2–9 market. Victoria approved 10,284 apartments in four-storey-plus buildings in the latest 12 months (Property Council), and our earlier evidence shows that every Ventora brand we approached, declined to quote, and other Victorian AGWA members either declined or could take the work only by committing their whole production line.

5. What this means for the final report

The applicants told the Commission that the Australian industry "offers and supplies like goods to projects of that scale in the ordinary course of trade" (EPR 691-454). The industry's own submissions do not bear that out. Of the 19 submitters that make windows or window products, 2 (11%) may be able to supply a larger scale project in Victoria. Most supply houses.

The SEF found that the Australian industry supplies all market segments, Class 1 to Class 9 (SEF 691, section 4.7.3), on tender evidence held in confidence. The public record now points the other way. We ask the Commissioner to:

1. **Weigh each submission by what the submitter makes.** Submissions from machinery, hardware, chemical and residential suppliers are not evidence of capacity in the Class 2–9 segment.
2. **Test the capacity claim directly.** Ask the applicants to identify, publicly or in a non-confidential summary, the Australian producers that have supplied a Class 2–9 project of more than 2,000 m² in Victoria during the investigation period.
3. **Revisit the segment finding.** Reconsider the finding at section 4.7.3 that the industry meaningfully supplies Class 2 to Class 9 buildings.
4. **Grant the Class 2–9 exemption.** Grant the exemption in our application made on 2 Nov or, at minimum, the exemption for projects committed before 15 October 2026.