INDUSTRY SUBMISSION

Investigation 691 | Aluminium windows and doors from China

NON-CONFIDENTIAL — FOR PUBLIC RECORD

Submitted by AMC Modular IP Pty Ltd | ABN 95 670 257 815 | 3 November 2026

1. Purpose and basis of submission

AMC Modular IP Pty Ltd requests that the Commission examine the actual manufacturing and import arrangements behind aluminium windows and doors exported from China. In particular, AMC is concerned that third-party fabrication, production under Australian brands and direct purchasing by developers may be insufficiently visible when production costs, export transactions, import volumes and injury are assessed.

Industry supply arrangements can involve products sold under an established supplier's name being manufactured at separate third-party or OEM facilities. This submission identifies verification risks arising from such arrangements; it does not allege wrongdoing by a named company.

AMC supports legitimate overseas manufacturing and direct procurement. The relevant question is whether the Commission has reliable evidence of who made the goods, how they were purchased and priced, and whether the relevant transactions are properly reflected in its statutory analysis.

2. Lower-cost third-party and OEM production

An established manufacturer or exporter may subcontract some or all fabrication to independent or related factories with lower labour, overhead, equipment, supervision or quality-management costs. Finished goods may then be sold under the principal supplier's brand. The exporter, contracting supplier and physical manufacturer can therefore be different entities.

These differences matter because a principal supplier's own factory cost records may not describe the actual production of goods bought from third parties. Verification should distinguish in-house manufacture from purchases of finished goods, processing services and related-party supplies, and should reconcile those arrangements with reported production quantities and export sales.

AMC is also concerned that moving production to lower-cost third-party facilities can enable an exporter to absorb some or all of the commercial impact of anti-dumping duties while maintaining low Australian selling prices. Cost reduction and duty absorption are not automatically unlawful or proof of circumvention. Nevertheless, changes in production arrangements should be visible to the Commission, particularly if they materially affect the costs, transactions or entities relevant to an investigation or subsequent review.

3. Australian brands, system suppliers and certification holders

Australian aluminium system suppliers, distributors or certification holders may contract with Chinese manufacturers to fabricate windows and doors for sale in Australia under Australian product systems or brands. Such arrangements may be exclusive, licensed or OEM-based.

Such supply arrangements can provide overseas manufacturers with access to established Australian sales networks and product systems. They may also create a pricing advantage where offshore production is cheaper than local fabrication. The Commission should identify the physical manufacturer, exporter, Australian system owner and importer as distinct parties where their relationships are material to the investigation.

Relevant transactions may include finished-goods purchase prices, processing charges, royalties, licence fees, rebates and related-party dealings. Where relevant to the statutory methodology, those arrangements should be verified rather than inferred from the Australian brand appearing on the product.

A separate concern is whether products manufactured at an offshore facility are actually within the scope of any Australian-held certification relied upon. Certification is not automatically transferable to every manufacturing facility or

product, but legitimate offshore production can be compliant. AMC does not ask the Commission to determine certification breaches; it asks that manufacturing identity and associated costs not be obscured by branding or licensing structures.

4. Direct imports by builders and property developers

Australian builders and developers increasingly have the ability to buy finished windows and doors directly from Chinese factories for individual construction projects, without purchasing through established Australian manufacturers or specialist importers. This can remove distribution and other intermediary costs and improve project margins.

The concern is not direct importing itself. Rather, direct-to-project procurement may intensify price competition for Australian manufacturers while creating a different compliance-cost profile from businesses maintaining permanent product testing, technical support, certification administration and local distribution operations. Those cost differences should not be confused with evidence of dumping, but the direct-import channel is relevant to understanding import prices, volumes and competitive effects.

AMC also considers that importer accountability warrants attention. A project-specific development entity may cease trading after completion, making later investigation or enforcement more difficult, although builders and developers are not automatically free of legal responsibility. This issue supports a separate, broader proposal for importer registration and traceability applying to builders and developers as well as specialist importers.

For Investigation 691, AMC asks the Commission to consider direct-to-builder and direct-to-developer transactions when assessing import channels, relevant prices and injury, to the extent the evidence and legislation permit.

5. Specific verification matters requested

AMC requests that the Commission consider the following where material to its statutory assessment:

- Identify each relevant actual manufacturing facility and its relationship to the exporter, brand owner and Australian importer.
- Distinguish goods made in the exporter's own facilities from finished goods purchased from third-party or related manufacturers.
- Reconcile subcontract orders, invoices, inventory, production quantities and exported quantities.
- Examine relevant manufacturing charges, royalties, licence fees, rebates and related-party transactions.
- Identify direct-to-project import transactions and consider their price and volume effects on the Australian industry.
- Where statutory grounds arise, examine material post-duty changes in manufacturing arrangements through the appropriate review or anti-circumvention process.

AMC does not seek an automatic adverse finding, a predetermined duty rate or a presumption that outsourced manufacture is improper. Its request is for verification proportionate to the materiality of these arrangements.

6. Curtain wall products — request for a separate market examination

AMC notes that curtain wall products are expressly excluded from the goods under consideration in Investigation 691. AMC is concerned that Australian curtain wall fabrication capacity has materially declined, with local manufacturers exiting parts of the market because of intense price competition from Chinese-manufactured systems. AMC requests that the Commission consider whether the curtain wall market warrants a separate examination, including whether there is evidence of dumping and resulting injury to Australian industry. AMC recognises that duties cannot simply be extended to excluded products without the applicable statutory process and supporting evidence.

7. Broader importer accountability

The practices described above also support consideration, by the responsible building-product regulators, of proportionate importer registration and traceability requirements. Those requirements should apply to the actual Australian importing entity, whether a specialist distributor, builder, developer or project company, and should address manufacturer identification, evidence of suitability, record retention and ongoing accountability. AMC recognises that

creating such a licensing regime is outside the Commission's powers in this investigation and raises it for possible referral to the appropriate authorities.

8. Closing request

AMC respectfully requests that the Commission consider the manufacturing and importing arrangements identified above when verifying relevant costs and transactions and assessing price effects and injury in Investigation 691. AMC also asks that the distinct curtain wall market be considered for possible separate examination.

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