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3 November 2026

The Commissioner
Australian Trade Remedies Commission

NON-CONFIDENTIAL VERSION

By email: Investigations1@atrc.gov.au

Dear Commissioner,

RE: INVESTIGATION 691 – ALUMINIUM WINDOWS AND DOORS FROM CHINA – RESPONSE TO STATEMENT OF ESSENTIAL FACTS NO. 691

Urban Property Group is a NSW developer and builder with a substantial pipeline of residential projects, many of them currently under construction. We are a purchaser of aluminium windows and doors from Australian companies that procure their products from China, and an interested party in this investigation. This submission responds to Statement of Essential Facts No. 691 (SEF 691), published on 14 October 2026.

We support fair competition, strong Australian manufacturing and action against genuine dumping. Our concern is narrower: how SEF 691 treats cooperating exporters that were not individually examined, and the effect of the securities now being taken on housing delivery. **We ask the Commissioner to reconsider the securities taken on goods from residual exporters, and to reassess the 24.4% residual rate before the final report is made.**

1. Cooperating exporters are being assigned a rate based on other exporters' data

Two of our suppliers responded to the Commission's preliminary information request. SEF 691 classifies both as residual exporters: they were not selected for individual examination. Their goods nevertheless attract a 24.4% rate (SEF 691, section 6.11), derived from the weighted averages of the selected exporters under section 269TACAB(2), without any assessment of their own export prices, normal values or costs.

That rate does not reflect the conduct of any residual exporter. It is a product of which exporters happened to be selected: the selected exporters' outcomes range from a negative margin for Altop to 51.6%. Exporters that engaged with the Commission's process in good faith, as the initiation notice invited them to, should not carry a rate set entirely by others' data. We ask the Commission to confirm that it has used, in favour of cooperating exporters, the latitude that section 269TACAB(2)(c) and (d) allow, and, if an individual assessment of any residual exporter is practicable before the final report, to offer it to exporters that responded to the information request.

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2. The securities are not needed for this segment and are already causing disruption

SEF 691 explains that securities are being taken because they are necessary to prevent material injury to the Australian industry while the investigation continues (section 2.2.5). By the Commission's own estimate, residual exporters represent approximately 9% of the Australian market (section 6.11), and the final report is due on 16 December 2026, about six weeks away. We question whether collecting securities at 24.4% from this segment for that period is necessary to prevent injury, given the immediate costs it places on importers and developers.

Windows and doors are essential building inputs. Designs, supply arrangements and financing are committed well before delivery, and significant additional charges introduced during construction is difficult to accommodate. Changing suppliers can require redesign, further testing and recertification, adding costs and delays. We have already experienced the disruption, as suppliers have halted delivery of some product pending payment of additional charges that neither we nor our supplier had anticipated.

3. Consequences for housing delivery and Australian jobs

For Urban alone, our preliminary estimate is that the 24.4% rate would add tens of millions of dollars across our affected pipeline. Where apartment sale prices are fixed, these costs cannot simply be passed on. For future projects, they can remove the remaining margin needed to secure finance and commence construction. Across the sector, the consequence will be fewer new homes as developers can no longer afford to build housing.

The employment effects extend beyond manufacturing. Our imported windows and doors are installed by Australian-based contractors and local crews, supporting skilled installation and site-supervision work. When housing projects become unviable, those businesses and workers lose work too. We recognise that the Commission does not apply a public interest test. We raise these consequences so that they are before the Commissioner and, through the final report, the Minister, who retains discretion under section 269TL of the *Customs Act 1901*.

4. What we ask

We respectfully ask the Commissioner to:

1. **Reconsider the securities taken on goods from residual exporters** and cease taking them pending the final report, so that affected shipments can be released without these additional charges. Where levies have been collected, we recommend they be refunded promptly.
2. **Reassess the 24.4% residual rate** and, in the final report, not recommend final duties on cooperating residual exporters at a rate derived from other exporters' data.

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3. **Record the housing and employment consequences in the final report**, and draw the Minister's attention to transitional arrangements for goods already contracted, ordered or in transit before 15 October 2026.

We can provide project-level cost and procurement evidence on a confidential basis and would welcome the opportunity to meet the Commission.

Yours sincerely,



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