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Director, Investigations 1
Australian Trade Remedies Commission
By email: Investigations1@atrc.gov.au

Dear Director

Re: Investigation 691: Aluminium windows and doors exported from the People's Republic of China. Submission in response to Statement of Essential Facts 691. (Non-confidential version for the public record)

I'm Paul Lazzaroto, a builder (Director). I make this submission in response to Statement of Essential Facts 691 (SEF 691) in Investigation 691, concerning aluminium windows and doors exported from the People's Republic of China. Aluminium windows and doors are a core input to the buildings I deliver. apartments and offices

Interim securities have applied since 15 October 2026 to aluminium windows and doors from China entered for home consumption, at rates of 5.3% to 51.6% for selected exporters, 24.4% for residual exporters and 73.3% for uncooperative and all other exporters (SEF 691, p.12). I understand that the Commissioner's final report is due to the Minister by 16 December 2026. Measures of this scale on a core building input are extraordinary, and they have caused considerable disquiet across the building industry and among households trying to build or buy a home. In my view they are out of step with the open, competitive economy Australia has built over recent decades, and would sit more naturally in a far more closed era of trade policy. They are also causing severe disruption across existing contracts: builders, contractors and their clients who priced and signed work in good faith before 15 October 2026 now face a cost that was never in those contracts and cannot readily be passed on. I ask the Commission to consider the following matters before finalising its recommendations.

1. Anachronistic in a modern open economy

Australia has built an open, competitive economy over recent decades, and Australian builders and home buyers depend on competitive markets for the inputs that go into every home. Charges of up to 73.3% on aluminium windows and doors are, in my view, anachronistic in a modern open economy. They belong to a far more closed era of trade policy, and they are fundamentally at odds with the competitive market on which housing in this country depends. I ask the Commission to recognise in its final report that measures of this severity cannot be reconciled with contemporary economic policy and, if any measure is recommended at all, to confine it to the minimum necessary.

2. At odds with the Government's own housing and inflation goals

The Government has committed through the National Housing Accord to 1.2 million new well-located homes, and the Reserve Bank is working to return inflation to its 2-3% target. A charge of up to 73.3% on a product that goes into every new home makes homes dearer to build and adds to price pressure at precisely the moment both objectives are under strain. In my view, measures of this severity are fundamentally at odds with those national objectives

and cannot be reconciled with them. I ask the Commission to state that conflict plainly in its final report, so that the Minister has it squarely before him when deciding.

3. It adds cost to every new home

The Commission's own analysis puts aluminium windows and doors at "approximately 5% to 7% of total construction costs for a typical 3 to 4 bedroom dwelling" (SEF p.60). I note the Commissioner describes this as "a small share" and says the estimates "are not a basis on which to assess the overall cost impact of the proposed measures"; that is my concern, because no overall cost impact has been assessed. On simple illustrative arithmetic using the ABS average approval value of a new house in 2025-26 ($517,430), a 24.4% rise in window and door costs would add up to about $6,300 to $8,800 per home. Increases of that order, at a time of acute pressure on housing affordability, are a matter of serious and widely shared concern. That is an upper bound, not a forecast, and I ask that the final report assess the actual effect on dwelling costs.

4. A serious risk of insolvencies and unfinished homes

Submissions summarised in the SEF warn that measures "could render existing projects loss-making and contribute to significant project delays, disputes and possibly insolvencies" (SEF p.58), and that builders and contractors have "limited capacity to absorb these costs" (p.56). Those warnings should be taken with the utmost seriousness. When a builder fails, the cost does not stop with the business: the families with half-built homes and the trades who are owed money carry it too. In my view, final measures of this severity, applied to work already priced and under way, create a serious risk of insolvencies, unfinished homes and unpaid trades. I ask the Commission to address that risk directly in the final report, and not to recommend measures that would expose existing projects to it.

5. I strongly oppose final measures of this severity

SEF 691 states that "the broader public interest considerations have not been considered by the Commissioner in making their preliminary findings and recommendations set out in this SEF" (SEF p.60). Final measures at rates of up to 73.3% on a product that goes into every new home would, in my view, be extraordinary and unjustified while that remains the case. I strongly oppose final measures of this severity. I urge the Commission not to recommend final measures at these levels and, if it makes any recommendation, to state plainly in the final report that their effect on housing, inflation and existing contracts has not been assessed, so that the Minister is not asked to impose them on an incomplete basis.

6. Nobody has weighed the public interest

SEF 691 states that "the broader public interest considerations have not been considered by the Commissioner in making their preliminary findings and recommendations set out in this SEF" (SEF p.60). When the Government declined a formal public interest test in 2011, it committed that reports to the Minister may include "the expected effect of any measures on market concentration and domestic prices" and that the agency "will also report on any claims regarding impacts on downstream industries" (Streamlining Australia's anti-dumping system, 2011, s6.2). Given the extraordinary scale of the proposed measures, and the considerable disquiet they have caused among those who build and buy homes, that assessment is in my view essential. I ask that the final report for Investigation 691 include that assessment, so the Minister has it before deciding.

7. Families building or buying a home will bear the cost

Submissions summarised in the SEF state that these costs "would ultimately be passed on to downstream purchasers" (SEF p.56). The Commission puts aluminium windows and doors at "approximately 5% to 7% of total construction costs for a typical 3 to 4 bedroom dwelling" (p.60), yet no overall cost impact has been assessed. A charge on windows and doors does not stay with importers: it moves down the chain to fabricators, installers and builders, and ultimately to the households trying to build or buy a home. It is, in my view, extraordinary and unjustified that families already under acute pressure on housing affordability should carry the cost of measures of this severity without that cost ever being weighed. I ask the Commission not to recommend measures whose cost to home buyers has not been assessed.

For these reasons, I ask the Commissioner to:

(a) include in the final report an assessment of the expected effect of measures on dwelling costs, downstream users and competition, so that the Minister can weigh the public interest;

(b) address the matters raised above before finalising the recommendations; and

(c) if measures are recommended, recommend proportionate forms of measure, an adequate transition period of at least 12 months before any final measures take full effect, and transitional treatment for orders and contracts committed before 15 October 2026, given the severe disruption the measures would otherwise cause across existing contracts.

I make this submission in my own name and it reflects my own views. I have read it carefully and take responsibility for it. Facts cited are from SEF 691 and the public sources referenced.

I appreciate the Commission considering these points.

Yours faithfully

Paul Lazzaroto
Director