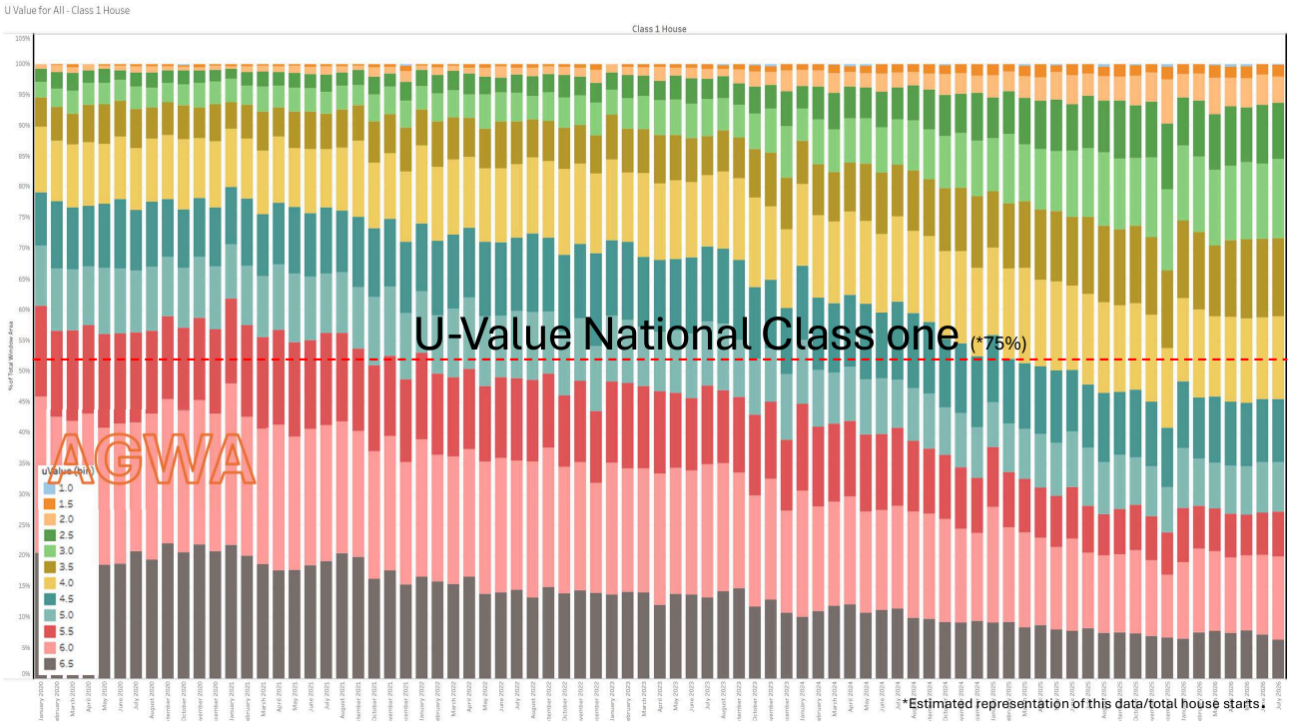
Annex E: Evidence extracts

Response to SEF 691 by Ellie Vaisman, Procon Materials Pty Ltd. Non-confidential.

Each extract below gives the source, the access date and the words relied on. Quotations were checked against the source text on the date shown. SEF page numbers are PDF pages of SEF 691. Where a figure is ProCon's own measurement or arithmetic, this is stated.

E1. AGWA NatHERS certificate data: U-value of windows in new Class 1 houses

Source: AGWA, *AGWA Window Market Report 2026/07 EOM, "NatHERS Certificate Window Approvals Data"*, p.2, chart "U Value for All - Class 1 House", y-axis "% of Total Window Area" (agwa.com.au, downloaded 2 November 2026). AGWA footnote: "Estimated representation of this data/total house starts" (national Class 1, "*75%").



AGWA's own description (AGWA news item, "NatHERS Data Continues to Reveal Shifting Window Performance Trends", 1 September 2026, accessed 2 November 2026): "Nationally, the data points to an ongoing shift towards lower U-value products and changing SHGC distributions as the market adapts to more demanding building performance settings."

Shares measured from AGWA's chart (approximate; ProCon measurement). The chart has no data labels. ProCon measured each bar's colour bands; accuracy is about ±1 percentage point. Each bin label is read as its lower bound.

Share of window area	2020 average	Jan 2024	Jul 2025	Jul 2026	12 months to Jul 2026
U < 2.5	—	3.6%	5.3%	6.5%	6.7%
U < 3.0	3.2%	7.1%	13.7%	15.5%	15.7%
U < 4.0	12.3%	19.5%	37.3%	41.0%	40.2%
U ≥ 4.0	87.7%	80.5%	62.7%	59.0%	59.8%

Arithmetic (ProCon): U < 3.0 rose from 3.2% (2020 average) to 15.5% (July 2026), a factor of about 4.8 ("about five times", around 500%). U ≥ 4.0 fell from 87.7% to 59.0%.

E2. Published U-values of Australian sliding door systems

Best (lowest) published whole-window U-value (Uw), from manufacturer pages and WERS extracts, accessed 21 October or 2 November 2026.

Mainstream, non-thermally broken:

System	Best Uw	Source
AWS Vantage 541 residential sliding door (WERS AWS-013-021)	3.00	Taberners / AWS, *Solutions for 7 Star Performance* (2024), p.6
G.James 246 Series ("U-Value range: 2.90 – 6.50"; max height 2400)	2.90	G.James 246 sliding door brochure
Capral Urban 284 ("Uw Range 2.71 - 3.06"; panel 2700 × 1500)	2.71	capral.com.au
Bradnam's Signature ("Lowest U-value (double glazed)" 2.7)	2.7	Bradnam's sliding doors product information
Wideline Paragon / Ascend25 / Horizon ("Minimum U Value" 3.3 / 2.9 / 2.9)	2.9–3.3	wideline.com.au
Alspec ProGlide Ultraflat (Uw 3.0–3.9 DG)	3.0	alspec.com.au

Thermally broken (the specialist tier):

System	Best Uw	Source
AWS ThermalHEART 731 ("Uw Range 2.1-5.2"; panel 3000 × 2000)	2.1	awsaustralia.com.au
Capral Urban Comfort 284TB ("Uw Range 2.00 - 3.10"; panel 2700 × 1500)	2.00	capral.com.au
Alspec ThermAFrame TB sliding door (1.9–3.0; panel 3000 × 2300)	1.9	alspec.com.au
Bradnam's Signature TB 100 mm (DG low-E, U 2.1)	2.1	Bradnam's thermal break brochure
Dowell ThermaLine sliding door (DOW-025-05, 1.8)	1.8	Dowell ThermaLine information guide
A&L ComfortSmart Hybrid (Ventora) ("Double glazed Uw range 2.2 – 3.5"; "Max frame 2365mm high"; "STANDARD SIZES TO SUIT BRICK OPENINGS")	2.2	A&L ComfortSmart Hybrid sliding and stacking door brochure (April 2025)

These show that thermally broken product is made in Australia, within published size limits (E3). They do not show volume, price or availability to an ordinary builder.

E3. Published maximum panel heights (sliding doors)

System	Published maximum height
A&L ComfortSmart Hybrid (Ventora): "Max frame 2365mm high", "Max panel 2365 high x 1210mm wide"	2,365 mm
G.James 246 residential	2,400 mm
Dowell ThermaLine	2,400 mm
Bradnam's Essential	2,450 mm
Wideline Ascend25 (2650 × 1600)	2,650 mm
Bradnam's Signature; Capral Urban 284 and Urban Comfort 284TB	2,700 mm
AWS ThermalHEART 731 (openings "up to 12 metres wide and 3 metres high"); Alspec ThermAFrame TB sliding door	3,000 mm

Goods description (SEF p.70): windows up to 3.0 m high × 4.0 m wide; doors up to 3.0 m high × 7.0 m wide.

E4. NCC 2022, NatHERS and the ABCB handbook

- **NCC 2022 Volume Two, S42C2(1):** "A building must achieve an energy rating, including the separate heating and cooling load limits, using house energy rating software, of greater than or equal to— (a) 7 stars; or (b) for a building in climate zones 1 or 2, 6.5 stars ...".
- **NatHERS FAQs:** "Under NCC 2022 new houses will have to meet 7 stars and a Whole of Home rating of 60 (out of 100)."
- **Adoption:** "1 May 2023 marks the adoption of NCC 2022. Transition arrangements apply for some requirements." Several states applied the energy provisions from 1 October 2023 (ABCB, NCC 2022 state and territory adoption dates).
- **ABCB, *Housing energy efficiency handbook* (2024):**
- NCC 2022 brought "An increase in stringency to the minimum star rating required, from 6 to 7 stars" (p.11).
- "Winter performance: If you fail in winter, the strategies which increase the effective solar gain (higher SHGC or less shade) and reduce heat loss (lower U-Value) will be needed." (p.83)
- "If the design has a high area of windows, compliance will likely be more expensive using the elemental DTS Provisions for external glazing." (p.84)
- **Note:** the NCC does not set a nationwide U-value limit for each window. NatHERS rates the whole house. Under the 7-star settings, designs with meaningful glazing area routinely need windows below U 3.0 to comply.

E5. Market and cost research

- **GBCA media release, 23 September 2024:** "Developers have managed costs by slightly reducing the size of windows"; "This has led to a rise in double glazing usage, now covering 27% of average window areas".
- **Moore, de Kleyn, Horne and Simko (RMIT / La Trobe), "Cheap overseas, ruinous in Australia: here's how to make double-glazed windows the norm", *The Conversation*, 6 May 2025:**
- "In 2016, only 6% of windows installed in new houses in Australia had U-values below 4. In 2024, that figure was 19%".

- "only a few companies make these windows in Australia, meaning competition is limited and costs remain high".
- "Some told us it was cheaper at times to import from Europe or Asia than to buy Australian-made."
- **Sustainability Victoria**, *Upscaling high-performance windows in Victoria* (workshop presentation): "Cost for Low-E and thermal breaks can be seen as prohibitive."

E6. Public record: the applicants and other interested parties

- **Applicants, EPR 691 document 1 (application), pp.19–20:** "the market is increasingly flooded with thermally broken Chinese AWDs where much of the glass is toughened, and has low-emissivity coatings – that may not be required by many minimum build requirements, but are nonetheless included at no apparent additional cost." / "This over-specification … creates a false equivalence between imported Chinese products and compliant domestic offerings".
- **Ventora / AGWA, EPR 423 (SEF p.98):** "larger windows, high-performance systems and window wall products form part of a continuum of product performance requirements rather than separate product categories".
- **SEF p.109** (factors influencing demand described by the applicants): "changes to building codes and regulatory requirements including requirements relating to energy efficiency, safety and environmental performance".
- **Empire Windows, EPR 397:** "The Australian industry primarily produces 'Standard Residential Suite' products being standard-gauge, non-thermally broken aluminium frames designed for high-volume, low-margin residential developments."
- **DENA Windows, EPR 503:** thermally broken systems "are not necessarily available across the broader Australian manufacturing market in the same range of configurations, dimensions, performance levels and price points."
- **Supaglass, EPR 530, para 8:** post-NCC 2022 energy reports "were repeatedly specifying U-values below anything they could source or fabricate locally"; para 14: "For the last 15 years, Supaglass has been a member of the Australian Glass and Window Association (AGWA)".
- **GIW Environmental Solutions, EPR 545, §6:** "the product selected and installed should match the performance used in the building assessment"; "A change in glazing or frame specification should trigger review before substitution is accepted".
- **Hickory Group, EPR 408 (SEF p.201):** Australia lacks capability and capacity "at the scale, timeframe and specification required for major multi-storey residential and commercial projects."
- **EX0086, Exemption Inquiry Report (Precision Pipe and Tube Steel, 11 July 2022), p.9:** "The commission considers the difference between gauge thicknesses of 0.4 mm and 0.9 mm is sufficiently material to find that the goods are not like, nor are they directly competitive."
- **SEF p.180, Table 27** (AMQs from 14 Australian industry members): "Shift toward imported inputs or imported systems to remain competitive — 42%".
- **SEF pp.213–214:** ad valorem "may not be the most appropriate duty method when applied to goods which may have high priced varieties or models of the goods, particularly where a particular variety of goods was not causing injury to the Australian industry"; the goods have "a wide range of high priced goods".

E7. ProCon national inquiry share: U-value below 3.0

- **Source:** ProCon company evidence, statement of Ellie Vaisman, Founder and Managing Director.

- **Base:** ProCon quotes 200 to 300 projects a month, from every state, across entry-level, mid-market and high-end houses, multi-residential, factories, medical and commercial work.
- **Finding:** between **50% and 60%, and more**, of ProCon's inquiries now call for a whole-window U-value **below 3.0**, and the share is rising.
- **Nature of the evidence:** company evidence from ProCon's own inquiry records. It is consistent with AGWA's national certificate data (E1) and with independent research (E5).

E8. Alspec ProGlide Minimalist: WERS census

- **Product page:** Alspec, "ProGlide Minimalist™ Sliding Door" (accessed 2 November 2026): "embedded top, bottom, and jamb rails"; "Maximum Recommended Sizes": height 3500 mm, panel width 2400 mm, panel weight 400 kg; "DG Uw 2.5".
- **WERS listings:** Alspec's own published WERS ratings feed for the product page, filtered to "ProGlide Minimalist Sliding Door - Embedded Sill" (the only ProGlide Minimalist frame listed). 37 configurations, all double glazed. ProCon count, 2 November 2026:

Uw	Configurations
2.5	1 (ALS-132-009)
2.8	29
2.9	2
3.0	3
3.7	2 (clear / argon / clear)
Total	**37**

- Uw 2.80 or worse: **36 of 37 (97%)**. Uw below 2.80: **1 of 37 (3%)**. Uw 2.4 or better: **0**.
- **The only sub-2.8 configuration:** ALS-132-009, Uw 2.5, SHGC 0.24, glazing "Glassworks 6mm LowE - 366 / 12mm Argon gap / 6mm LowE i89 - Aluminium Spacer" (dual low-E coatings).

E9. Injury and causation data

- **ABS Building Activity, Australia**, original series, financial-year sums of quarters to the June quarter 2026, retrieved 28 October 2026 (Annex D). ProCon arithmetic: new house commencements FY2022 to FY2024: 132,078 to 100,266, **−24.1%**; all dwelling commencements: 205,020 to 159,521, −22.2%.
- **RBA cash rate target:** 0.10% to 4 May 2022; 4.35% from 8 November 2023.
- **Treasury, *HomeBuilder FAQ*:** HomeBuilder grants for contracts signed between 4 June 2020 and 31 March 2021.
- **ABS 6427.0, Producer Price Indexes, Table 18:** aluminium windows and doors index 166.6 in the June quarter 2026 against a 2019 average of 115.6, **+44.1%** (ProCon arithmetic).
- **SEF 691:** industry volume down about 19% over the injury period (p.172); the contraction "may explain in part" (p.198); Ventora "remained profitable" (pp.176–177, 311); Australian industry share about 79% (p.177); unit costs "unrelated to Chinese imports" (pp.197, 200); "a highly concentrated incumbent supplier" (p.199); "not possible to achieve a representative sample of the market" (p.192); factors other than dumping examined (p.197).
- **Legal test:** *Customs Act 1901* s269TAE(2A) and (2AA); Ministerial Direction on Material Injury 2012 ("greater than that likely to occur in the normal ebb and flow of business").

E10. SEF rates: selected, residual and uncooperative exporters

Exporter (SEF p.12)	Rate	Multiple of Foshan AMJ (ProCon arithmetic)
Foshan AMJ	5.3%	1.0×
Residual (cooperative non-selected) exporters	24.4%	4.6× ("about five times")
Guangdong Yuanjiang Facade Co., Ltd	34.8%	6.6× ("about seven times")
Uncooperative and all other exporters (70.4% + 2.9%)	73.3%	13.8× ("almost fourteen times")

- Residual exporters: "approximately 49% of Chinese exports"; rate set by reference to the selected exporters (s269TACAB(2)(c)–(d); SEF p.150).
- Uncooperative: export price set at "the lowest verified FOB export price of the selected exporters" (p.151); "The commission observed a large degree of variation in the export price of selected exporters" (p.152).
- Foshan AMJ's normal value was constructed under s269TAC(2)(c), with aluminium extrusions and glass adjusted by reference to a benchmark (pp.138–139).
- **SEM Windows Pty Ltd, EPR 406** (2 January 2026): submission opposing the application.
- The comparisons of Australian selling prices in Part D.5 are Ellie Vaisman's market experience.

E11. Supporter SEF responses and AGWA's FAQ

- **Scope:** all 15 published SEF responses (EPR 500–546) from Australian manufacturers or suppliers supporting measures: EPR 523, 527, 531, 532, 533, 534, 535, 536, 537, 539, 540, 541, 542, 543, 544. Each was searched for "competi*", "compete" and "level playing field" on 2 November 2026. Counts are ProCon's.
- **Competition language: 13 of 15** (all except EPR 523 and 527).
- **Exact phrase "fair and level playing field": 10 of 15** (EPR 531, 533, 534, 535, 536, 539, 540, 541, 542, 544).
- Extracts: Mecal, EPR 544: "Competition is healthy." Clearview, EPR 532: "Competition is important, but it needs to be fair." H2 Custom Joinery, EPR 534: "While our company does not manufacture the aluminium windows and doors that are the subject of Investigation 691 ..."
- **AGWA, *Anti-Dumping FAQ*** (accessed 2 November 2026): Q3 "AGWA stands for a fair and level playing field, whether it is regulation, compliance, or free trade." Q6 "We are aware of many importing companies that are trying to do the right thing; however, there are unfortunately some that are not." Q7 "AGWA stands, as it always has, for a compliant and fair playing field".
- **SEF pp.200–201:** overseas manufacturers "may enjoy a competitive advantage ... due to ... lower costs of labour, lower costs of energy, higher levels of productivity, greater levels of automation, supply chain efficiencies, more efficient business processes and/or the benefits of economies of scale"; "legitimate efficiencies".

E12. Class 2–9 and the cost of measures: public submissions

- **EPR 517 (commercial builder, 21 October 2026), §2:** "The duties / tariffs are imposed on many projects and Subcontractors who have already executed Head Contracts. Relief from Clients is unlikely, so this will either be worn by small business builders, or small business Subcontractors"; "Windows will still need to be procured from

offshore and the costs will be passed onto end users". §3: Ventora's brands "do not feature prominently in Class 2 – 9 construction and have not for a long period of time."

- **Galmar Group, EPR 504 (20 October 2026):** "a fixed-price contract cannot simply be reopened when a supplier's cost changes" (p.1); "a 24.4% rise in window and door costs would add up to about $6,300 to $8,800 per home. That is an upper bound, not a forecast" (p.4). ProCon extension of the same arithmetic at 73.3%: up to about $26,500 per home (upper bound).
- **Grimmond Construction, EPR 510 (22 October 2026), §2:** "Additional duties may increase tender prices, reduce headroom within client budgets and add uncertainty to projects priced before the measures became known".
- **SEF p.12:** securities at 5.3% to 73.3% on goods entered on or after 15 October 2026 (PAD notice dated 14 October 2026). **SEF p.59:** "the Act does not provide for the Commissioner to undertake a public interest test or an assessment of the overall economic impact". **SEF p.60:** "the broader public interest considerations have not been considered".

E13. The Productivity Commission and the 2011 Government response

- **Productivity Commission, *Australia's Anti-dumping and Countervailing System*, Inquiry Report, released 27 May 2010, Key Points:**
- "The Australian anti-dumping system, which is based on agreed WTO rules and procedures, benefits a small number of import competing firms, but imposes greater costs on the rest of the economy."
- Deficiencies in the arrangements "which can add to the costs for the community" include: "there is no consideration of the wider economic impacts of anti-dumping measures"; "measures can too easily become akin to long-term protection, or outdated in the face of changing market circumstances".
- "Introduction of a 'bounded' public interest test … would be a practical means to take account of wider impacts and prevent the imposition of measures that would be disproportionately costly."
- **Australian Government, *Streamlining Australia's anti-dumping system* (2011):** Recommendation 5.1, "Introduce a public interest test": "Not accept" (Appendix; s6.1). Instead (s6.2), the Minister may be given "an assessment of the expected effect of any measures on market concentration and domestic prices", and a report on "any claims regarding impacts on downstream industries".