ATCO Structures™

6 November 2026

The Commissioner
Australian Trade Remedies Commission
By email: Investigations1@atrc.gov.au

Dear Commissioner,

Investigation 691: Aluminium Windows and Doors exported from China
Support for GI Procurement's product-specific exemption request

ATCO Structures & Logistics Pty Ltd, ABN 71 083 902 309 (ATCO), supports the request by Grand International Procurement Pty Ltd (GI Procurement) for the Australian Trade Remedies Commission to consider a product-specific exemption for the modular face-fixed window system supplied to ATCO Queensland.

About ATCO

ATCO designs, manufactures and supplies modular buildings in Australia, including buildings for workforce accommodation, education, health, government and commercial applications.

For the purposes of this letter, ATCO Queensland refers to ATCO's modular manufacturing operations at Luscombe and Rocklea, Queensland.

GI window system

GI Procurement developed the below listed product-specific window systems specifically for ATCO's modular manufacturing requirements. These systems are supplied by GI Procurement for the exclusive use by ATCO.

Product code	Description
GI-WIN-9001208-C2-5	900mmH x 1208mmW Face Fixed XO Sliding 5mm Grey Float Glass Window; Black Frame. Includes Fly Screen (Packed Separately)
GI-WIN-1200908-C2-5	1200mmH x 908mmW Face Fixed XO Sliding 5mm Grey Float Glass Window; Black Frame. Includes Fly Screen (Packed Separately)
GI-WIN-350750-C2-4	350mmH x 750mmW Face Fixed XO Sliding 4mm Obscure Glass Window w/ PVO; Black Frame. Includes Fly Screen (Packed Separately)
GI-WIN-3501208-C2-4	350mmH x 1208mmW Face Fixed XO Sliding 4mm Obscure Glass Window w/ PVO; Black Frame. Includes Fly Screen (Packed Separately)
GI-WIN-9001208-C2-6.38	900mmH x 1208mmW Face Fixed XO Sliding 6.38mm Grey Laminate Glass Window; Black Frame. Includes Fly Screen (Packed Separately)
GI-WIN-1200908-C2-6.38	1200mmH x 908mmW Face Fixed XO Sliding 6.38mm Grey Laminate Glass Window; Black Frame. Includes Fly Screen (Packed Separately)
GI-WIN-12001208-C2-6.38	1200mmH x 1208mmW Face Fixed XO Sliding 6.38mm Grey Laminate Glass Window; Black Frame. Includes Fly Screen (Packed Separately)
GI-WIN-350750-C2-6.38	350mmH x 750mmW Face Fixed XO Sliding 6.38mm Frosted Laminate Obscure Glass Window; Black Frame. Includes Fly Screen (Packed Separately)

The system:

- incorporates a face-fixed window, matching external aluminium trim and an aluminium internal reveal specifically configured for ATCO's modular building system;
- is supplied in a format and within lead times aligned with ATCO's factory production requirements; and
- is supplied with the compliance documentation required by ATCO for its modular building applications.

The GI window system forms part of ATCO Queensland's factory-based production process, with its configuration supporting the efficient installation of the window and reveal during module manufacture.

Commercial impact

ATCO Queensland manufactures modular buildings in Australia in a market that includes competition from modular buildings manufactured in Asia. Maintaining competitive input costs is therefore important to ATCO's Australian manufacturing operations.

If GI Procurement were required to pass through a material increase in the cost of these windows arising from the application of dumping or countervailing measures, the GI window system could become commercially uncompetitive against alternative products. Such an increase would also raise ATCO's manufacturing input costs and could reduce ATCO's competitiveness against imported modular building solutions.

ATCO's position

ATCO supports Australian manufacturing and recognises the purpose of Australia's trade remedies framework. ATCO also considers it important that the particular circumstances of products developed for Australian manufacturing applications are considered within that framework.

Accordingly, ATCO asks the Commission to consider GI Procurement's request for a product-specific exemption, having regard to the system's development specifically for ATCO's modular manufacturing requirements, its integration into ATCO Queensland's factory production process, and the potential impact of a material cost increase on the competitiveness of both GI Procurement's product and ATCO's Australian manufacturing operations.

ATCO provides this support based on its direct experience as the customer and end user of the GI window system. Matters relating to GI Procurement's upstream supply chain, importation arrangements and satisfaction of the applicable statutory exemption requirements are appropriately matters for GI Procurement to substantiate to the Commission.

ATCO would be pleased to provide further information regarding its use of the GI window system if required.

Yours sincerely,

