Adam Borowski
Director, Everly Group Services Pty Ltd
adam@everly.com.au

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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 am Adam Borowski, Director at Everly Group Services Pty Ltd, a property developer. I make this submission in response to SEF 691 in Investigation 691 (aluminium windows and doors exported from China). Window and door costs feed directly into the feasibility and budgets of the projects we deliver. As Director of Everly, I bring experience as both a Development Director and a developer in my own right across a range of residential and mixed-use projects.

As Development Director of The Commons in Brunswick, an acclaimed sustainable apartment project, we relied on a local window supplier providing subsidised pricing to achieve the project's environmental sustainability credentials. Had we paid full market retail rates, the project would not have proceeded. Ultimately, neither the window manufacturer nor the developer made a profit.

On subsequent projects, we worked with larger local window manufacturers, with mixed results. Most recently, on a high-end apartment development, we worked with Procon, a company that demonstrated local professionalism while delivering cost-effective, high-quality windows manufactured in China.

This was not a compromise on quality. Procon had developed a sophisticated supply chain capable of delivering products that met Australian standards at a competitive price.

In my view, a blanket ban on imported windows and the imposition of anti-dumping levies are blunt policy instruments that fail to recognise the complexity of the construction industry. Such measures risk protecting domestic manufacturers from competition at the expense of housing affordability, project feasibility and innovation.

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. 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.

2. It works against innovation and productivity

The Productivity Commission has warned that long-standing anti-dumping measures "that become akin to tariffs are likely to lessen the imperative for recipient industries to respond to import competition through innovation and other forms of productivity improvement" (Inquiry Report No. 48, 2009, p.35). Its 2025 report found labour productivity in housing construction fell 12% between 1994-95 and 2022-23, while productivity across the economy rose 49%. I ask the Commission to consider these downstream productivity effects in its final report.

3. It reduces competition

During the investigation period Australian industry supplied the majority of the market, China about 19%, and imports from other sources were "a small but stable part" of it (SEF p.16, p.174). The Productivity Commission has found that the anti-dumping system "benefits a small number of import competing firms, but imposes greater costs on the rest of the economy" (Inquiry Report No. 48, 2009). I ask that the final report assess the expected effect of measures on competition and market concentration in the supply of windows and doors, consistent with the 2011 commitment on reporting market effects to the Minister.

4. 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.

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.

This submission sets out my own views and experience. I have reviewed the content and I am responsible for it. The facts I have cited are drawn from SEF 691 and other public sources as referenced.

I appreciate the Commission considering these points.

Yours sincerely

Adam Borowski
Director, Everly Group Services Pty Ltd