CITY WEST HOUSING

3 November 2026

Commissioner
Australian Trade Remedies Commission
By email: investigations1@atrc.gov.au

Dear Commissioner,

Re: Investigation 691 – Aluminium windows and doors exported from the People's Republic of China; Statement of Essential Facts 691 and Trade Remedies Notice 2026/147

City West Housing is a not-for-profit registered community housing provider established in 1994 to deliver affordable rental housing in Sydney. We currently own and manage over 1,000 apartments that we rent to some 1,700 residents and their families on very low to moderate incomes and we have a development pipeline of over 600 apartments under construction or in planning. By charging affordable rent, we support residents to live near where they work, contributing to the economy and their local communities.

We oppose the imposition of the proposed anti-dumping and countervailing duties under Investigation 691 to the aluminium windows and doors required for our affordable housing developments.

The proposed duties will significantly affect two live affordable housing development projects in Alexandria, NSW, one currently under construction and the other due to commence construction in late 2026. These projects are high rise developments of 161 and 264 apartments respectively that will be owned and operated as affordable rental housing in perpetuity. Both projects were approved by the City of Sydney via a design excellence process and have specific and complex façade requirements. There is currently no Australian manufacturer capable of supplying aluminium windows and doors at this scale and level of design complexity. This is also the case for most other projects in our pipeline which are 80 apartments or more per development.

The two live projects are being partially funded by the Commonwealth through the Housing Australia Future Fund (HAFF) which was set up in 2023 in response to the housing crisis. The financial impact to these two projects alone is anticipated to be in the order of several million dollars (this is an estimate as there is currently insufficient detail available to confirm the impact).

The quantum of HAFF funding into these projects was locked in back in 2025 when City West Housing first tendered for HAFF funding. There is limited capacity to negotiate an increase in funding from Housing Australia as a variation to the approved funding envelope and City West Housing (and the community housing sector more generally) has limited equity that can be deployed to meet any gap in funding caused by unplanned increases in development costs.

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The proposed duties will also impact several other upcoming developments that City West Housing has in planning and which are anticipated to commence construction in the coming years.

We request that registered community housing providers delivering social and affordable housing developments be exempt from the proposed duties where suitable Australian supply cannot meet project requirements.

If you have any questions, you are welcome to contact me on 0497 666 696 or greig.martin@citywesthousing.com.au.

Yours sincerely,



Greig Martin
Head of Development