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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 Craig Saunders (SITE MANAGER), writing in response to SEF 691 in Investigation 691 (aluminium windows and doors exported from China). Costs in the building contract are ultimately paid by people like me. I am building or renovating a home. Window and door costs are one part of a budget already stretched by interest rates and construction costs. I CANT BELIEVE THIS NEW DIRECT TAX ON ME. THIS GOVT KILLED THE GLASS INDUSTRY WITH ULTRA HIGH ELECTRICITY PRICES SO ALL THE GLASS AND MOST WINDOW HARDWARE COMES FROM CHINA ANYHOW.

Interim securities have applied since 15 October 2026 to aluminium windows and doors from China, 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). This submission addresses the question the Commission must answer: whether dumping has caused material injury to the Australian industry, separately from injury caused by other factors (Customs Act s269TAE(2A)). In my view SEF 691 does not establish that it has. Chinese windows and doors are a long-established part of this market: the SEF itself refers to "the established links and volumes maintained by exporters from China" (SEF p.18). The decline the SEF records is measured from a stimulus-driven peak in 2021-22, coincides with a fall in residential building starts to their lowest level in more than a decade, and largely occurred before the investigation period. Throughout, the Australian industry retained about 79% of the market (SEF p.311). I ask the Commission to consider the following matters.

1. Australian makers still hold almost 80% of the market

The SEF finds that the Australian industry accounted for approximately 79% of the Australian market during the investigation period, with imports from China at 19% (SEF p.311; p.16). The Ministerial Direction on Material Injury 2012 states that "a loss of market share alone cannot be decisive", and the Commission's Manual notes that where dumped imports hold a small market share "it may be difficult to demonstrate material injury" (Manual s4.2). The SEF also finds that the lead applicant "remained profitable" throughout the injury period (SEF p.177; p.211), did not accept the claim of price depression (p.176), and records the lead applicant's highest margin in FY2023, after the claimed injury began (p.176). Only four industry members provided profit data, and one reported an improvement (pp.177-178). An industry that holds almost four-fifths of its market and has remained profitable through a residential downturn that took building starts to their lowest level in more than a decade has not, on these facts, suffered injury beyond the ordinary ebb and flow of

business. I ask the Commission to explain how these findings meet the materiality standard in the Direction.

2. Chinese windows aren't new to this market

Aluminium windows and doors from China are not a new presence in the Australian market. The SEF itself refers to "the established links and volumes maintained by exporters from China" (SEF p.18). In the investigation period China supplied over 95% of imports of the goods (p.103), from more than 1,400 Chinese exporters to over 2,700 importers (p.311). These are, in the Commission's own word, established links, not a new entrant. Yet the applicants claim injury only from FY2022 (SEF p.170). They do not claim it for FY2015 to FY2018, the four highest years for total new dwelling commencements in the ABS series since 1990-91 (between 217,189 and 231,161 a year; ABS Building Activity, original series). A long-standing source of competition cannot, without more, explain a decline that begins in a particular year, and that year coincides with the peak and turn of the building cycle. I ask the Commission to explain in the final report what changed in FY2022 in the conduct of Chinese exporters, as opposed to the market itself, that justifies attributing the decline to dumping.

3. Every Ventora window brand that was asked declined commercial work

The SEF preliminarily finds that the Australian industry "produces and supplies AWD across all AWD market segments", including Class 2 to Class 9 buildings, and that constraints on supply "were not attributable to an inability to manufacture the goods" (SEF pp.100-101). The applicants' own brands are saying otherwise. This investigation was initiated on the joint application of Ventora Group Pty Ltd (Ventora) and the Australian Glass and Window Association (AGWA) (SEF pp.6, 10), and the Commission treats Ventora, the largest participating producer, as the key indicator of the industry's performance (SEF pp.15, 83, 101). Ventora's own website lists its window and door brands as including Stegbar, Trend Windows & Doors, A&L Windows and Doors, Aneeta, Breezway and Corinthian Doors. In October 2026 a Victorian commercial builder sought commercial windows from three of those Ventora window brands: Stegbar, Trend Windows and A&L Windows. Every Ventora brand that was contacted declined. Stegbar replied on 26 October 2026, from a ventora.com.au address: "Unfortunately we would not be able to do this, it is production out of scope. We recommend contact a local builder in your area." Trend Windows was asked whether it supplies projects similar to a commercial project in Bentleigh, Victoria, of about 2,500 m²: a fully jambed commercial window suite (not a residential suite), thermally broken and double-glazed low-E, with some laminated glass and with insulated spandrels and mullions. It replied on 27 October 2026: "Sorry Trend will not be quoting on this project." A&L Windows was sent a quote request through its website for a Victorian commercial package of the same kind of fully jambed, thermally broken commercial suite. Its Retail Sales team replied on 28 October 2026: "Thank you for considering A&L Windows Pty Ltd for your project. The project sits outside our product and business scope. You could perhaps try a commercial fabricator." Asked which commercial fabricator might have capacity for a package of about 3,500 m², it replied the same morning: "None in particular. We're not in commercial market." The other brands listed are Aneeta and Breezway, which make specialist sash and louvre windows, and Corinthian Doors; none of them was approached as a supplier of a commercial window suite for this work. In my view this goes to the heart of the case. On their own words, these Ventora brands appear to operate purely in the Class 1 (detached residential) segment: A&L says plainly that it is "not in commercial market" and that the work is outside its "product and business scope"; Stegbar calls the work "out of scope" and

sends the builder to "a local builder in your area"; Trend will not quote. Yet the lead applicant seeks dumping duties on every class of building on the footing that the Australian industry also supplies Class 2 to 9 work (SEF pp.100-101). These were not specialist façades, and they were declined while the SEF records Ventora operating at approximately 80% capacity utilisation (p.101). Spare capacity that will not quote is not supply to that segment. Where the applicant's own brands will not quote, they are not offering like goods for that work, and imports cannot have taken a sale the applicant was not prepared to make. The SEF also counts $72.6 million forgone on tenders that industry members "elected not to bid for" (p.190), and records that no tender data was requested from end users (p.189). I ask the Commission to test its capability finding against current enquiries from builders for Class 2 to 9 commercial packages, not only against the applicants' own submissions; to ask Ventora to identify which, if any, of its brands offers a commercial window suite for Class 2 to 9 buildings, and to state, for each brand, how many Class 2 to 9 enquiries it declined or did not quote during the investigation period and since; and to remove from the lost-tender and forgone-bid figures any project the industry declined to quote or could not supply.

4. The injury clock starts at a stimulus-fuelled peak

The injury analysis period begins on 1 July 2021 (SEF p.13), and the applicants claim injury from FY2022 (SEF p.170). That baseline is not a normal year. New house commencements in FY2021 (140,728) were the highest in the ABS series since FY1991, and FY2022 (132,078) was the second highest (ABS Building Activity, original series). That peak was driven by the HomeBuilder grant, which applied to contracts signed from 4 June 2020 to 31 March 2021 and, from April 2021, allowed 18 months for construction to begin, pulling commencements forward into FY2022 (Treasury, HomeBuilder FAQ). The SEF itself records that building input costs "rose sharply in 2021 and 2022 ... resulting from the COVID pandemic and government stimulus programs" (SEF p.115). Measuring injury from the top of a stimulus cycle overstates the decline that followed. Under the Ministerial Direction on Material Injury 2012, injury must be "greater than that likely to occur in the normal ebb and flow of business". I ask the Commission to assess the industry's performance against a baseline that is not inflated by stimulus, and to explain why the fall from that peak is not the ordinary unwinding of the cycle.

5. Most of the decline happened before the investigation period

The SEF reports that the Australian industry's sales volume fell by around 19% over the injury period but by around 5% in the investigation period (SEF p.172). On those figures, roughly three-quarters of the volume decline occurred before the investigation period began. The SEF also finds that the bulk of the lead applicant's 25% rise in unit costs occurred in FY2022 (p.200), at the height of the COVID and stimulus cost spike the SEF itself describes (p.115), and that in the investigation period the cost increase was driven mainly by selling costs (p.200). The Commission's Manual, quoted in the SEF, states that s269T(2AD) "cannot support an inference or presumption that material injury identified as occurring before the investigation period can be attributed to dumped imports" (SEF p.184). In the investigation period, the industry's sales value fell by around 6% while the market fell by around 2% (p.198). I ask the Commission to confine its causation finding to the investigation period, and to explain why a movement of that size, in a market the industry still dominates, is material injury caused by dumping.

6. The numbers show a building downturn, not dumping

Section 269TAE(2A) requires that injury caused by other factors, including "contractions in

demand", not be attributed to dumping. ABS data show a sharp and well-documented contraction. New house commencements fell 24%, from 132,078 in FY2022 to 100,266 in FY2024, the lowest since FY2013. Total new dwelling commencements fell 22%, from 205,020 to 159,521, the lowest since FY2012 (ABS Building Activity, original series). Over the same period the Reserve Bank raised the cash rate target from 0.10% to 4.35%. The applicants themselves list "interest rates and housing affordability" as drivers of residential demand (SEF p.109), and the SEF notes that windows and doors are installed after site preparation, structure and framing (p.113), so window demand follows commencements with a lag. The SEF accepts that the contraction in demand "may explain in part" the industry's lower sales (p.198) and that costs rose for reasons "unrelated to Chinese imports" (p.197). The industry's reported volume decline of around 19% (p.172) is of the same order as the fall in house commencements over the same years. I ask the Commission to quantify the effect of this contraction, using dwelling numbers rather than dollar values, and to show in the final report how much injury remains once it is removed.

In summary, I ask the Commissioner to:

(a) find that SEF 691 does not establish material injury caused by dumping, and recommend that the investigation be terminated;

(b) in any event, quantify the effect of the contraction in residential construction using dwelling numbers and real activity, and separate it from any injury attributed to dumping (s269TAE(2A));

(c) confine the causation finding to the investigation period (s269T(2AD); SEF p.184);

(d) test its finding that the Australian industry can supply all market segments against current enquiries from builders for Class 2 to 9 work, including enquiries that every one of the applicant Ventora's brands that was contacted (Stegbar, Trend Windows and A&L Windows) declined or would not quote, ask Ventora to identify which, if any, of its brands offers a commercial window suite for Class 2 to 9 buildings, and exclude from the lost-tender and forgone-bid figures any project the industry declined to quote or could not supply (SEF pp.100-101, 190);

(e) undertake a remedied-price analysis of the tenders relied on, so that only the effect of dumping, and not legitimate cost advantage, is attributed to dumping; and

(f) if measures are nonetheless recommended, apply the lesser duty rule, exporter-specific rates and transitional treatment for contracts signed before 15 October 2026.

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, the public sources referenced and supplier correspondence.

Thank you for your consideration.

Yours faithfully

Craig Saunders
SITE MANAGER