IRONSIDE

02/11/26

Mr. David Latina - Commissioner
Australian Trade Remedies Commission
By email: investigations1@adcommission.gov.au & investigations1@atrc.gov.au

Response from Ironside Construction Pty Ltd to the Statement of Essential Facts (SEF) for Investigation No 691 into alleged dumping and subsidisation of aluminium windows and doors exported from the People's Republic of China.

Dear Commissioner,

I am writing on behalf of Ironside Construction Pty Ltd, a Victorian builder delivering primarily multi-residential projects across Greater Melbourne. We have serious concerns about the securities and proposed duties on aluminium windows and doors imported from China, and their impact on our business, our subcontractors, and the wider building industry.

1. Immediate effect with no transition or notice

The securities took effect on 15 October 2026, the day after the preliminary findings were published, with no transition period and no practical notice. They apply to goods for projects that are already contracted, priced and under construction, and many of these projects were tendered, priced and Contracted before the investigation began in November 2025. Our projects are locked into Contracts, designs and supply arrangements for bespoke, engineered systems that in many cases take years to develop. Changing suppliers mid-project is not an option. Qualifying a new supplier requires significant due diligence to ensure they have the required design, engineering, manufacturing, quality and delivery capability. In many cases, this process can take over 12months to create a relationship prior to awarding a package.

It is unreasonable to assume we can just pivot to alternative suppliers overnight and not experience delays to projects and cause significant financial loss. We request that at a minimum all existing projects and contracts should therefore be excluded, and the industry provided with reasonable time to plan and implement around these changes.

2. Immediate impact on cash flow and cumulative pressure on an industry still recovering

The securities are an immediate, un-budgeted and unforeseen cost and cash outlay. It is unreasonable to not consider the effect that this will have on a business having no prior knowledge this would occur.

The industry is only just recovering from the cost escalation and financial distress of COVID. Since then, we have absorbed further cost increases from global conflicts and rising fuel prices, changes to Security of Payments Act and the introduction of additional bond requirements. Each of these has affected cash flow and reduced margins in an already challenging market.

Construction has one of the highest insolvency rates of any industry. ASIC data shows more than 12,000 construction companies entered external administration between July 2022 and June 2026, about a quarter of all Australian insolvencies. Another sudden and unforeseen cost shock risks further failures across the supply chain, which could be catastrophic for the industry and housing affordability and availability.

3. Local manufacturing capacity & benefit

The local market does not have the capacity or the required window systems to meet the industry's demand. Australian manufacturers do not have the facilities, systems, engineering, capability or workforce to supply the complexity and volume of aluminium windows and doors required for Class 2 to 9 buildings. Curtain wall is already excluded from the measures, and the same reasoning applies here.

The industry will be required to look at alternative overseas supply to ensure the delivery requirements of the project can be achieved. Alternatively the industry demand to both local suppliers, and those few Chinese suppliers with the lower securities and proposed duties will be inundated with increased demand, creating a more concentrated market with less competition, and this oligopoly will raise their prices to meet the demand, resulting in higher construction costs, and worsening housing affordability and availability.

Applying the measures to existing contracts and supply agreements will not help the local window industry for which these measures are purportedly alleged to protect. Builders are already locked into contracts, supply arrangements and designs for these projects, so Australian manufacturers will gain no benefit from the immediate introduction. In almost all cases the industry cannot change suppliers at all because of these commitments. The only added effect is additional cost to the project and reduced margins to Subcontractors, Builders and Developers.

A reasonable transition period, including time to qualify new suppliers, would also give the local industry the opportunity to grow and adapt: to develop and test new systems, build its capability and capacity, and establish systems & working relationships with builders, designers and engineers. That would strengthen and protect the local industry over the long term, which is the stated purpose of the securities and duties. Imposing them immediately does the opposite, adding cost to the industry without giving local manufacturers the time to compete for and win the work.

4. Future tenders and housing affordability

We are currently in one of the hardest markets with many projects currently not feasible and apartment pricing souring due to increased construction costs.

The Government has committed to lowering construction costs, reducing red tape and increasing housing supply. The introduction of these duties works directly against those objectives. The Commission's own analysis puts aluminium windows and doors at about 5% to 7% of total construction cost for a typical three-to-four-bedroom house (SEF p. 60), and up to about double that for multi-level apartments. At the 24.4% residual rate, the securities add about 1.25% to total construction cost at the lower end and about 2.5% for apartment buildings. These small percentage increases in construction costs will be the difference between a project being feasible or not, whilst simultaneously wiping out margins for builders, subcontractors and suppliers.

These changes will only put further pressure on housing affordability and supply, as ultimately any increase in costs will eventually be passed on throughout the entire supply chain, with cost impacting beyond the initial importers paying the duties and ending with the homebuyers paying significantly more.

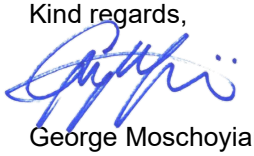
5. Summary

We respectfully ask the Commission and the Government to provide exemption and withdraw all securities and duties on aluminium windows and doors imported from China. In the alternative, we ask that:

1. Goods supplied under contracts and supply agreements executed before 15 October 2026 are excluded or exempt.
2. Goods for Class 2 to 9 buildings are exempt, as local manufacturing cannot meet the industry's demand.
3. An exemption and transition period of no less than 12 months applies to new contracts, giving the industry time to qualify alternative suppliers and appropriate Contract the works to ensure no financial risk or uncertainty to any party.

We would welcome the opportunity to meet with the Commission to collaborate and establish a fair and reasonable pathway forward that is of benefit to all industry stakeholders.

Kind regards,



George Moschoyiannis
Operations Manager
Ironside Construction Pty Ltd