MASTER BUILDERS AUSTRALIA

Submission to the Australian Trade Remedies Commission

Response to the Statement of Essential Facts No. 691 (SEF 691) and Trade Remedies Notice (TRN) No 2026/147

9 November 2026



Who we are

Master Builders is the nation's peak building and construction industry association, which was federated on a national basis in 1890. Master Builders' members are the Master Builder State and Territory Associations. Over 130 years, the Master Builders network has grown to more than 32,000 businesses nationwide, including the top 100 construction companies. Master Builders is the only industry association representing all three sectors: residential, commercial, and civil construction.

The Master Builders network also delivers vocational education and training through its network of registered and group training organisations across Australia. This includes trade qualifications in building and carpentry as well as ongoing professional development training.

Membership with Master Builders is a stamp of quality, demonstrating that a builder values high standards of skill, integrity, and responsibility to their clients.

Master Builders' vision is for a profitable and sustainable building and construction industry.

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Executive Summary

Master Builders Australia (Master Builders) acknowledges the preliminary affirmative determination issued by the Australian Trade Remedies Commission (Commission) on 14 October 2026 in relation to Investigation No. 691 – Aluminium Windows and Doors (AWD) from China and takes this opportunity to comment on the Commission's findings and the potential implications of any final measures for Australia's building and construction industry.

The Statement of Essential Facts (SEF), finds that the impositions of tariffs on exporters of AWD from China is warranted however, since its publication Master Builders has received substantial and overwhelming feedback from builders, fabricators, local manufacturers and contractors demonstrating that the proposed measures will have a significant adverse impact across the entire building and construction industry.

The measures have, and will, impose significant costs on current and future projects that were designed, priced, contracted and committed to months, and in many cases years, before any duties were contemplated.

Businesses are now facing substantial and unbudgeted tariff liabilities arising from procurement decisions made months, and in some cases years, before the measures were contemplated. As many projects are subject to fixed-price contracts, these costs are often unrecoverable and must be absorbed by builders and specialist contractors or addressed through costly redesign and re-procurement processes. Rather than increasing domestic production in the short term, the measures risk penalising businesses for historic decisions, placing further pressure on project viability, housing delivery, employment and, in some cases, the ongoing viability of affected businesses.

Evidence provided to Master Builders by Hacer Group further demonstrates the practical consequences of the preliminary measures for ongoing construction projects.

Hacer estimates potential exposure to tariffs of approximately $8.3 million across five current projects involving Chinese-sourced window-wall systems, with some projects already in production, transit or advanced procurement stages.

Hacer submits that these costs arise on projects that were designed, contracted and procured prior to the commencement of securities and may create risks including project delay, contractual disputes, insolvency pressures and reduced housing delivery. The evidence also raises questions as to whether domestic suppliers actively competed for all of the affected projects and whether Australian manufacturing capability necessarily translates into immediately available and substitutable project capacity.

Further evidence from Hacer is included at **Attachment A**.

This is an untenable situation given the broader economic circumstances facing the industry and Master Builders calls for a reconsideration of the Commissions findings.

Response to the Commission's findings

Master Builders recognises the important role of the Australian Trade Remedies Commission in investigating allegations of dumping and subsidisation and in ensuring Australia maintains a fair and competitive trading environment.

Master Builders does not seek to comment on the Commission's technical findings regarding dumping margins, but does seek to highlight the practical implications of any trade measures for the building and construction industry, including product availability, building design, National Construction Code (NCC) compliance, project delivery and housing supply.

Master Builders also seeks to respond to two key aspects of the Commission's findings.

No material injury

Trade measures should only be imposed where the evidence clearly demonstrates that dumped or subsidised imports have caused material injury to domestic industry.

ABS Producer Price Index data does not support a finding that the aluminium window and door market experienced significant price suppression or price depression during the relevant period.

Between March 2019 and September 2026, aluminium window and door prices increased by 45.4 per cent, slightly exceeding growth in house building material costs overall (43.7 per cent). During the ATRC examination period, aluminium window and door price growth accelerated even as broader building material cost growth moderated.

On its face, this evidence is inconsistent with claims that import pricing materially suppressed market prices and does not support a conclusion that all alleged injury experienced by domestic manufacturers can be attributed to dumped imports.

Substitution

Evidence received by Master Builders calls into question a key assumption underpinning critical aspects of the Commission's analysis, namely that imported and domestically manufactured AWD are readily substitutable.

While products may compete within the same market, practical substitutability within a construction project is often considerably more complex than market-level competition alone would suggest. Master Builders member feedback indicates that, in some cases, domestic manufacturers may be unable or unwilling to supply products with equivalent specifications, thermal performance, compliance characteristics or delivery outcomes. Consequently, substituting products may require redesign, revised compliance assessments, amended approvals, project delays and additional costs, rather than a simple change of supplier.

Windows and doors should not be viewed as commodity products.

Window systems are frequently specified at the design stage and become embedded within architectural, engineering, façade and energy-efficiency requirements. In many instances, builders are not the original decision-makers responsible for window selection, with specifications often determined by clients, architects, designers, developers, energy assessors or certifiers. Once incorporated into approved designs, engineering documentation, compliance assessments and fixed-price contracts, the ability to substitute products can be limited without substantial redesign, delay and cost.

These issues are particularly acute in commercial construction, multi-residential developments, façade-intensive projects and projects requiring high-performance glazing systems.

In such projects, window systems are often integral to the architectural design, façade engineering, energy performance and compliance strategy of the building, making substitution especially difficult once design documentation has been finalised. While the residential sector may in some cases offer

greater flexibility, Master Builders has also received member feedback that high-performance homes, architect-designed dwellings and projects with extensive glazing requirements may face similar constraints.

Accordingly, Master Builders submits that the Commission should:

- assess practical substitutability at a project level, rather than relying solely on evidence of market-level competition;
- examine whether domestic manufacturers can provide equivalent products in the required specifications, performance standards, quantities and timeframes;
- consider evidence that equivalent products may not be practically available for all projects;
- recognise that substitution may require project redesign rather than a simple change of supplier;
- consider the unique challenges associated with commercial, multi-residential and other highly specified projects; and
- consider the impacts on projects already in the development and construction pipeline, including whether implementation arrangements should reflect industry procurement cycles.

Master Builders does not contend that competition between imported and domestic products does not exist. Rather, Master Builders submits that competition at a market level should not be assumed to establish practical substitutability at a project level.

Member feedback suggests that this distinction is critical to understanding the potential impacts of any final measures on project delivery, housing supply, commercial construction activity and the broader building and construction industry. Specifically, the final report should acknowledge that products may compete in the same market while not being functionally interchangeable within an existing building design without redesign, delay, additional cost or compromise to the intended performance outcome.

Further evidence

Master Builders also attaches the following evidence in support of the positions outlined in this submission:

- **Attachment B** sets out information from the Australian Building & Property Association VIC Inc. ABPA VIC is a non-profit organization primarily composed of small to medium-sized companies with Asian backgrounds in construction and property. The insights of their members are particularly relevant to this investigation.
- **Attachment C** is a declaration from Jiangmen Aokai Building Materials that they have received no subsidy from the Chinese Government.
- **Attachment D** is a declaration from Zhejiang Zhongliany Curtain Wall Engineering Co Ltd that they have received no subsidy from the Chinese Government.
- **Attachment E** is a statement from Foshan Zhangmenren Building Materials Co., Ltd that they have received no subsidy from the Chinese Government.
- **Attachment F** is a statement from Pinnacle Façade and Guangdong Painigao Muqiangzhuangshi that they have received no subsidy from the Chinese Government.
- **Attachment G** is an email chain demonstrating not only the cost difference between locally sourced and imported product but the inability of the local manufacture to meet the energy efficiency requirements for the projects as specified.
- **Attachment H** provides evidence of the applicant companies (Trend and Stegbar) refusing to quote on certain projects.

Broader Economic and Industry Impacts of Tariffs

The state of the industry

Australia's building and construction industry is operating in an increasingly challenging environment.

New home building activity continues to fall well short of the level required to achieve the National Housing Accord target of 1.2 million new homes over five years. Since the commencement of the Accord in July 2024, Australia has accumulated a significant shortfall in housing approvals and commencements relative to the trajectory required to meet the target.

Master Builders forecasts that approximately 938,000 new homes will commence construction over the five-year Accord period, representing a substantial shortfall against the national target.

While demand for housing remains strong, project feasibility has deteriorated due to higher construction costs, elevated interest rates, labour shortages, declining productivity and broader economic uncertainty.

The industry's capacity to respond to housing demand is also constrained by workforce shortages. Master Builders estimates that the industry is currently experiencing a shortage of approximately 141,000 skilled workers, with this deficit projected to increase significantly over coming years without meaningful policy intervention.

These workforce pressures have been compounded by a sustained decline in productivity. Over the past decade, both labour productivity and multifactor productivity have deteriorated significantly, increasing the time, labour and capital required to deliver homes and other construction projects.

At the same time, building costs remain elevated as a result of supply chain disruptions, labour shortages, financing costs and regulatory pressures.

The combined effect of these factors is an industry that is being asked to deliver record levels of housing and infrastructure at a time when capacity constraints, productivity challenges and project costs remain historically high.

Potential retaliatory actions

Australia is heavily dependent on China for the majority of products and materials that the building and construction industry relies on.

It is therefore foreseeable that should a tariff be imposed, China will respond and use its market power to adversely impact a range of critical building products and materials outside of those that would be the subject of the tariff. As one builder said, "We cannot build in Australia without Chinese products."

Further, the adoption of a tariff on Chinese imports stands squarely at odds with the Australian Government's opposition to the Trump administrations tariffs on Australian goods. Global supply chains are already experiencing heightened uncertainty due to the US policy on these matters and any further impacts will simply aggravate this current situation.

Ultimately any retaliatory actions will only add cost, further exacerbating the housing affordability crisis.

Tariffs Risk Exacerbating Existing Industry Challenges

Against this backdrop, Master Builders is concerned that the imposition of tariffs on aluminium windows and doors will place further pressure on an industry already struggling to meet Australia's housing, commercial construction and infrastructure needs.

The issue is not simply the cost of an individual product. Rather, it is the cumulative effect of additional costs, supply constraints and project risks imposed on projects that are already facing significant viability challenges.

Tariffs Are a Blunt Instrument

Master Builders supports fair competition and does not condone the importation of substandard products or products that have been traded unlawfully.

However, tariffs are a blunt policy instrument. They increase the cost of imported products regardless of whether equivalent domestic alternatives are available, whether domestic manufacturers have sufficient capacity to meet demand, or whether particular projects depend on products that cannot readily be sourced domestically.

The evidence presented in this submission demonstrates that, for many commercial, multi-residential and high-performance residential projects, aluminium window and door systems cannot always be substituted without redesign, delay, additional compliance requirements and increased costs.

Where equivalent products are unavailable or cannot be supplied within required specifications or timeframes, tariffs do not encourage substitution. Instead, they increase the cost and risk of project delivery.

Ultimately, those costs are borne somewhere within the construction supply chain, whether by builders, developers, client, project owners, governments or home buyers.

Impacts on Project Feasibility, Housing Supply and Construction Activity

Master Builders is concerned that tariffs on AWD will have consequences extending beyond the direct increase in product costs.

Projects already in the planning, procurement or construction phase may face reduced feasibility, increased commercial risk and additional pressure on already constrained budgets.

The impacts are not confined to detached housing. Commercial developments, apartment projects, social and affordable housing, build-to-rent developments, institutional facilities and government-funded projects may all be affected where specified products become more expensive or more difficult to obtain.

These impacts are also relevant to government housing initiatives, including projects supported through the Housing Australia Future Fund and other Commonwealth and state housing programs. At a time when governments are seeking to accelerate the delivery of social and affordable housing, measures that increase the cost of key building inputs or constrain supply may adversely affect project feasibility, delivery timeframes and value for money outcomes.

The impacts are likely to be most acute in projects where window systems form a critical component of the architectural, engineering, façade or compliance solution and cannot be readily replaced by alternative products.

Measures that increase costs or constrain supply risk undermining broader policy objectives aimed at increasing housing supply and accelerating construction activity.

Supporting Australian Manufacturing Requires Targeted Policy Responses

Master Builders supports a strong domestic manufacturing sector and recognises the important contribution Australian manufacturers make to employment, investment, supply chain resilience and sovereign capability.

The challenges facing Australian manufacturers are real. Rising energy costs, labour costs, regulatory burdens and international competition have placed pressure on many manufacturing sectors over a prolonged period. These challenges are not unique to aluminium windows and doors and reflect broader structural changes that have occurred across the Australian economy over many decades.

Master Builders supports policy settings that strengthen the competitiveness and capability of Australian manufacturing. However, measures that increase construction costs are unlikely, in isolation, to address the underlying drivers of manufacturing competitiveness.

Policy initiatives that expand domestic capacity, improve productivity, encourage investment, support innovation and reduce structural cost pressures are more likely to deliver long-term benefits than measures that primarily increase the cost of imported products.

Domestic Capacity Must Be Considered Alongside Construction Demand

Master Builders is concerned that a disconnect may exist between current domestic manufacturing capacity and the volume, specifications and performance requirements demanded by Australia's construction pipeline.

Evidence provided by members indicates that, in some segments of the market, particularly complex commercial developments, multi-residential projects and projects requiring high-performance systems, obtaining equivalent products from domestic suppliers is already challenging.

Evidence provided by Hacer Group highlights the distinction between manufacturing capability and immediately available project capacity. Hacer notes that commercial window-wall systems are project-specific engineered façade systems involving façade engineering, performance testing, certification, installation methodology and integrated design responsibilities. Hacer submits that evidence of technical manufacturing capability does not necessarily establish that Australian suppliers have sufficient available capacity, lead times, testing capability or project delivery capability to service complex multi-residential projects at the scale and timeframe required by the market.

Where domestic capacity is unable to meet demand, restrictions on imports risk creating supply bottlenecks, longer lead times, reduced competition and increased project costs.

Industry participants have pointed to the experience of the COVID-19 pandemic as a practical example of the consequences that can arise when access to imported products is constrained.

Evidence provided to the Commission indicates that domestic suppliers experienced significant pressure during this period, with lead times extending materially as manufacturers worked to meet increased demand arising from disruptions to imported supply. This experience suggests that assessments of domestic capability should consider not only whether products can be manufactured in Australia, but whether sufficient capacity exists to meet market demand within the timeframes required by construction projects.

The experience of the construction industry during recent global supply chain disruptions demonstrated the importance of maintaining access to diverse and reliable supply sources. Limiting access to imported products before domestic capacity is capable of meeting market requirements risks creating unintended consequences including supply bottlenecks, extended lead times, project delays and reduced construction activity.

Accordingly, any measures affecting the supply of AWD should be considered in the broader context of Australia's housing, construction and infrastructure objectives. These objectives require policies that support increased building activity, improved affordability, enhanced productivity and the timely delivery of residential, commercial and community infrastructure projects.

Economic Analysis of Aluminium Windows and Doors in Australia

Analysis of Australian Bureau of Statistics (ABS) Producer Price Index data demonstrates that the price of aluminium windows and doors has broadly tracked, and in some periods exceeded, the growth in building material costs generally. Between March 2019 and September 2026, aluminium windows and doors prices increased by 45.4 per cent, compared with 43.7 per cent for house building materials overall.

Notably, during the ATRC's examination period, aluminium window and door prices accelerated despite a broader moderation in building material cost growth. This evidence is inconsistent with a market experiencing widespread price suppression or depression caused by dumped imports and instead indicates that aluminium window and door products maintained pricing trends broadly in line with, or stronger than, the wider construction materials market.

Analysis of aluminium window and door costs

The ABS Producer Price Index series includes time series data on the cost of Aluminium Windows & Doors as well as a composite index of materials used for House Building.

Between March 2019 and September 2026, the cost of aluminium windows and doors grew a little more quickly (+45.4 per cent) than the overall cost of house building materials (+43.7 per cent).

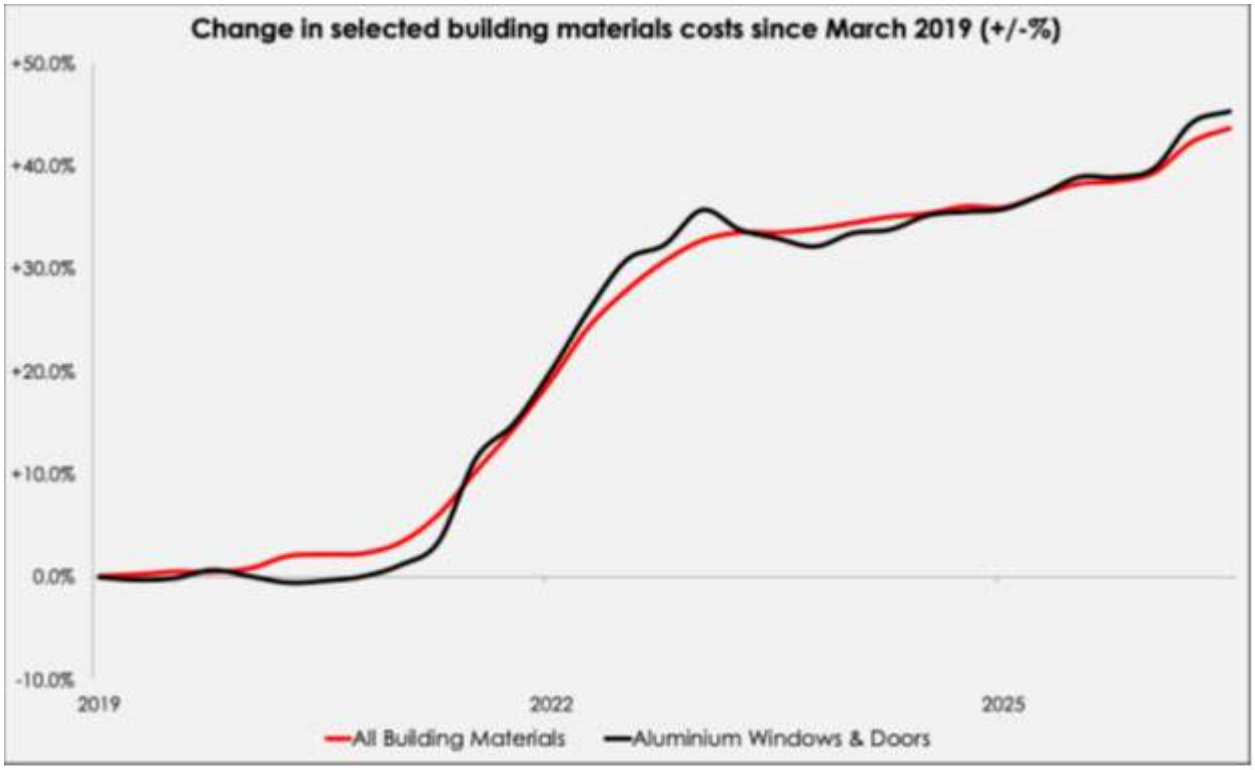
Over this period, the cost of aluminium windows and doors has largely moved in sync with that of house building materials generally. In all but two of the last eight financial years, the change in the cost of aluminium windows and doors has been within 1 percentage point of building materials cost growth generally.

The largest divergence between the two occurred in 2021-22 when the cost of aluminium windows and doors outgrew the aggregate cost of house building materials by 3.73 percentage points. The cost of aluminium windows and doors surged by +16.9 per cent during 2021-22, compared with a +13.2 per cent rise the overall cost of house building materials.

The cost of aluminium windows and doors has only fallen in one financial year since 2018-19. Even then, the size of the fall was very marginal (-0.1 per cent).

During the review period (2024-25), the cost of aluminium windows and doors actually accelerated even though the overall cost of house building materials slowed down over the same period.

Change in cost of Aluminium Windows and Doors compared with all house building materials to September 2026			
Financial year	**Change in Cost of Aluminium Windows and Doors (+/-%)**	**Change in cost of all house building materials (+/-%)**	**Difference (percentage points)**
2018-19	+2.1%	+2.7%	-0.57
2019-20	+0.5%	+1.0%	-0.54
2020-21	+1.1%	+2.5%	-1.44
2021-22	+16.9%	+13.2%	+3.73
2022-23	+12.7%	+12.1%	+0.61
2023-24	-0.1%	+2.3%	-2.34
2024-25	+2.1%	+1.4%	+0.69
2025-26	+3.3%	+2.6%	+0.77
Total change: March 2019 to September 2026 (+/-%)	**+45.4%**	**+43.7%**	**+1.69**
Source: Master Builders Australia analysis of ABS Producer Price Index (September 2026 quarter)			



Response to the Statement of Essential Facts and Preliminary Affirmative Determination

Master Builders submits that the practical realities of commercial and residential construction warrant further consideration in the Commission's assessment of the likely impacts of any final measures.

In particular, Master Builders is concerned that the assumptions regarding substitutability reflected in the Statement of Essential Facts do not fully account for the way aluminium window and door systems are specified, procured and incorporated into building projects.

While the Commission's analysis appropriately considers substitutability at a market level, builders experience substitutability at a project level. Products that may compete within the same market are not necessarily interchangeable within an existing building design. In Master Builders' view, the distinction between market-level competition and project-level substitutability is critical to understanding the practical implications of any final measures for builders, project owners and the broader construction industry.

Unlike many imported products, aluminium window and door systems are not typically purchased as interchangeable components late in the construction process. Window systems are frequently specified during concept design, developed design or documentation stages and become embedded within architectural drawings, façade designs, engineering documentation, energy modelling, National Construction Code (NCC) compliance pathways, planning approvals and contractual specifications.

As a result, decisions regarding window systems are often made many months before procurement occurs and, in many cases, before construction commences. By the time products are ordered or imported, builders may already be contractually committed to specified systems and performance outcomes. The ability to substitute alternative products at that stage may be constrained by technical, regulatory, contractual and commercial considerations.

Master Builders submits that this issue is particularly important in commercial, multi-residential and other highly specified projects, where window systems are integral to façade design, building performance and compliance strategies. However, the issue is not confined to commercial construction. Architect-designed homes, high-performance residential projects and dwellings incorporating extensive glazing may also rely upon specific window systems to achieve required design and energy-efficiency outcomes.

Master Builders is therefore concerned that projects already in the development and construction pipeline may be disproportionately affected by measures that apply after key design, specification and pricing decisions have been made. Builders may be placed in a position where they must either absorb additional costs arising from the measures or undertake redesign and re-specification processes that create delay, additional cost and project risk. In many instances, these costs may not be recoverable under fixed-price contracts.

Accordingly, Master Builders submits that the Commission should consider whether its assessment of substitutability adequately reflects the realities of project delivery and whether any final recommendations appropriately recognise the long procurement cycles that characterise the building and construction industry. The Commission should also consider whether available implementation options can mitigate unintended impacts on projects that were designed, specified, priced and contracted prior to the commencement of securities on 15 October 2026.

Evidence of Limited Practical Substitutability

Master Builders has received evidence from builders demonstrating the practical difficulties associated with substituting imported aluminium windows and doors with domestically manufactured alternatives. A summary of this evidence is provided in Attachment A.

Master Builders submits that the existence of domestic manufacturing capability should not be equated with product availability. The relevant question is not whether a product can theoretically be manufactured in Australia, but whether builders can obtain equivalent products within the required timeframe, specification, performance requirements and commercial parameters of a project.

The evidence provided to Master Builders demonstrates that:

- window systems are often selected by clients, architects, designers, developers, energy assessors or certifiers rather than builders;
- window specifications are frequently determined by required thermal, acoustic, structural, aesthetic and energy-efficiency performance outcomes;
- builders may become contractually committed to specified systems before procurement occurs;
- alternative products may not provide equivalent performance characteristics or compliance outcomes;
- substitution may require redesign, revised energy modelling, amended documentation and additional approvals;
- domestic manufacturers may be unable or unwilling to quote for specified products in some circumstances; and
- costs associated with redesign or product substitution may not be recoverable under fixed-price contracts.

The evidence therefore suggests that the practical substitutability of aluminium windows and doors should be assessed at a project level rather than solely at a market level. While products may compete within the same market and serve similar end uses, they are not necessarily interchangeable within an existing building design without delay, redesign, additional cost or compromise to the intended performance outcome.

Master Builders submits that this distinction is particularly relevant for commercial and multi-residential projects, where window systems are commonly integrated into façade design, engineering and compliance strategies. However, similar constraints can also arise in architect-designed homes, highly glazed dwellings and residential projects requiring high-performance window systems to achieve NCC energy-efficiency requirements.

Response to Appendix B – Substitutability of Domestic and Imported Products

Master Builders notes the Commission's observation in Appendix B that domestically produced and imported AWD are substitutable where those goods are used for the same or similar projects.

Master Builders respectfully submits that competition within the same market should not be assumed to establish practical substitutability at a project level. The Commission's analysis appropriately considers competition between suppliers and products within the market. However, builders, designers and project owners experience substitutability from the perspective of project delivery, compliance and building performance, rather than market competition alone.

In both commercial and residential construction, window systems are not selected simply because they fill an opening in a building. They are specified to achieve defined thermal, acoustic, structural, architectural and compliance outcomes. In many projects, particularly commercial developments,

multi-residential buildings and architect-designed projects, window systems form an integral part of the building envelope, façade design, engineering solution and energy-efficiency strategy.

Products may therefore compete within the same market and serve a similar general purpose while not being practically interchangeable within a specific project without redesign, revised compliance pathways, additional cost or delay.

Evidence provided to the Commission by Hickory Construction Group Pty Ltd reinforces this distinction.

Hickory submits that assessments of domestic availability should not rely solely on aggregate manufacturing capacity, spare capacity or the existence of suppliers operating within a market segment. Rather, availability and substitutability must be assessed against the specific project requirements, including engineering, testing, certification, performance standards, manufacturing scale and delivery timeframes.

Hickory notes that a supplier's ability to manufacture a product does not, of itself, demonstrate an ability to provide a compliant, project-specific façade system within the required construction programme.

Where an alternative product is unable to achieve the required thermal performance, energy-efficiency outcome, façade design, architectural intent or compliance pathway without redesign of the project, it cannot reasonably be regarded as a readily substitutable alternative from the perspective of project delivery.

This is particularly relevant for complex commercial and multi-residential projects where window and façade systems are designed as integrated engineering solutions rather than selected as stand-alone products. Evidence before the Commission suggests that substitutability may be constrained not only by product characteristics, but also by testing requirements, certification pathways, lead times, manufacturing capacity and the availability of project-specific engineering expertise.

Master Builders therefore submits that further consideration should be given to practical substitutability at a project level. Market-level competition and aggregate manufacturing capacity should not, of themselves, be treated as evidence that equivalent products are readily available for all building projects. The relevant question is not whether an Australian supplier can manufacture a broadly comparable product, but whether a suitable supplier can deliver a compliant solution that satisfies the project's technical requirements, certification obligations, construction programme and commercial constraints.

Evidence provided to the Commission suggests these considerations may not be fully captured by an assessment based primarily on market participation and aggregate capacity.

Evidence Raises Questions Regarding the Practical Availability of Domestic Supply

Master Builders has received evidence from builders indicating that obtaining equivalent products from domestic suppliers may not be as straightforward as assumed in the preliminary findings.

In one example, both Trend Windows & Doors and Stegbar declined to provide quotations for a residential project requiring high-performance window systems. Master Builders understands these businesses form part of the Ventora Group, one of the applicants in this investigation (See Attachment H).

While Master Builders does not suggest that these examples are determinative of wider market conditions, the examples are noteworthy because the suppliers involved form part of the applicant

group in this investigation. The examples raise legitimate questions regarding the practical availability of domestic supply and whether demand can be readily met if imports become more expensive or less available.

Master Builders submits that an important distinction exists between:

- theoretical manufacturing capability;
- practical product availability; and
- willingness and capacity to supply specified projects within required project timeframes.

The existence of domestic manufacturing capability does not necessarily establish that equivalent products are readily available to builders delivering complex or highly specified projects.

Evidence provided directly to the Commission by Hickory Construction Group Pty Ltd further illustrates this distinction.

Hickory reports that requests for quotation were issued to six Australian suppliers for a high-rise residential project incorporating stringent performance, engineering and certification requirements.

According to Hickory, none of the suppliers submitted a quotation, citing factors including project scale, limited high-rise experience, geographic constraints and capacity limitations. If verified, this evidence suggests that the existence of domestic manufacturing capability does not necessarily mean equivalent products are practically available for all projects or that domestic suppliers are willing or able to participate in every procurement process.

The Commission should therefore distinguish between the capacity to manufacture a product and the practical ability to supply an equivalent product within the timeframes, specifications and performance requirements demanded by a particular project. Evidence before the Commission suggests that project-specific factors, including scale, certification requirements, engineering complexity, available capacity and commercial considerations, may materially affect whether a domestic supplier is a realistic alternative in practice.

Master Builders has also received evidence from Hacer Group indicating that its procurement records do not show Ventora Group tendering for a number of relevant commercial window-wall packages advertised through established construction procurement platforms. While this evidence does not establish the position across the entire market, it raises an important question regarding causation and alleged displacement.

Where an Australian manufacturer did not tender for a particular project, further analysis may be required before that project can be characterised as a lost opportunity attributable to imported products. The distinction between a supplier losing a tender because of import pricing and a supplier not participating in the tender process at all may be relevant to the Commission's assessment of injury and causation.

Evidence from Builders, Developers and Fabricators

Evidence provided directly to the Commission by downstream industry participants reinforces many of the concerns raised by Master Builders.

Public submissions from builders, fabricators and project delivery companies describe circumstances where aluminium window and door products were selected and procured prior to the initiation of the investigation, often under fixed-price contractual arrangements that cannot readily accommodate additional costs arising from securities or duties. These submissions consistently identify risks including

unrecoverable cost increases, project delays, reduced project feasibility and adverse impacts on housing delivery.

The submissions also highlight practical distinctions between standard residential products and highly engineered Class 2 and commercial systems. Contributors note that these products are frequently project-specific, involve detailed engineering, testing and certification requirements, and cannot necessarily be substituted without redesign and re-procurement. Evidence before the Commission suggests that the availability of domestic manufacturing capability does not necessarily equate to the availability of equivalent supply for all project types, specifications and delivery timeframes.

Significantly, one submission reports that multiple Australian supply-and-install contractors were approached to quote for a large Class 2 residential project, but no quotations were provided. If verified, such evidence may indicate that, for some projects, imported products were not selected in preference to available domestic supply, but rather because equivalent domestic offerings were unavailable on comparable commercial terms or within required project timeframes. This distinction is directly relevant to the Commission's assessment of causation and the practical effectiveness of any proposed measures.

Equivalent Products Are Not Necessarily Equivalent Outcomes

Master Builders has received evidence that domestic alternatives proposed by local suppliers may not provide equivalent performance outcomes to the originally specified products.

In one example, a builder seeking low-E, thermally broken, double-glazed window systems was reportedly offered a single-glazed alternative with an estimated U-value of approximately 5, compared with approximately 1.5 to 2.5 for the originally specified system (See Attachment G).

The difference is not merely technical. In many projects, thermal performance assumptions are embedded within energy modelling, façade design and compliance documentation developed during the design phase.

The significance of this example is not simply that an alternative product was proposed. Rather, it demonstrates that products may compete within the same market while delivering materially different performance outcomes.

Hacer's evidence demonstrates that changing window-wall suppliers after design development and procurement have commenced may require redesign, consultant review, revised shop drawings, additional prototypes, performance testing, revised certification and changes to procurement and construction programmes. For many commercial and multi-residential projects, the issue is therefore not whether an alternative product exists, but whether a project-specific façade system can practically be replaced once design and procurement processes are already underway.

In both commercial and residential projects, lower-performing alternatives may require:

- revised energy modelling;
- redesign of glazing schedules;
- increased insulation requirements;
- changes to building orientation or building fabric;
- redesign of façade elements;
- amended engineering or compliance documentation; and
- other compensating measures to achieve required NCC outcomes.

Master Builders submits that the relevant question is not whether another window system exists. The relevant question is whether an equivalent product exists that can achieve the same performance, specification and compliance outcomes within the existing project design.

Where an alternative product requires additional compliance work, redesign or departure from client, architectural or engineering requirements, it should not be regarded as a readily substitutable alternative.

Redesign Is Not Substitution

A clear distinction should be drawn between product substitution and project redesign.

Where builders are required to alter a project because an equivalent product cannot be sourced domestically, the consequences extend well beyond procurement costs. Depending on the nature of the project, redesign may require:

- revisions to architectural documentation;
- re-engineering of components or façade systems;
- updated energy-efficiency assessments;
- amendments to planning or approval documentation;
- additional consultant costs;
- construction delays; and
- increased contractual and commercial risk.

Depending on the scale and complexity of the development, particularly in commercial, institutional and multi-residential projects, these impacts may extend across multiple building systems and project consultants.

This issue is illustrated by evidence from Hacer, which estimates that preliminary securities could result in approximately $8.3 million in additional exposure across five live projects. Hacer notes that many affected contracts are fixed-price arrangements and that the additional costs may not be recoverable from principals, developers, subcontractors or purchasers. In these circumstances, builders face a choice between absorbing substantial unbudgeted costs or undertaking redesign and re-procurement processes that themselves involve delay, disruption and additional expense.

These impacts are particularly significant in commercial buildings, multi-residential developments and projects with extensive glazing or bespoke façade systems, where window specifications are often deeply integrated into the overall design solution. However, similar issues may also arise in high-performance residential projects, architect-designed homes and dwellings that rely on specified window systems to achieve required NCC energy-efficiency outcomes.

A product should not be considered readily substitutable where achieving substitution requires redesign of the building, reassessment of compliance requirements or material changes to the intended project outcome. The need for redesign is itself evidence that products are not functionally interchangeable within that project.

Builders Are Caught in a Double Bind

Unlike many imported products, aluminium window and door systems are not typically procured as interchangeable components late in the construction process. They are often specified during the design phase and become embedded within architectural documentation, façade design, engineering requirements, energy modelling, planning approvals, procurement strategies and fixed-price contracts long before products are imported or installed.

This is particularly evident in commercial and multi-residential projects, where window systems frequently form a critical component of the façade, compliance and building performance strategy. However, the same issues can arise in architect-designed homes, highly glazed residential projects and dwellings requiring high-performance systems to satisfy National Construction Code (NCC) energy-efficiency requirements.

The imposition of securities from 15 October 2026 creates particular challenges for projects already in the development and construction pipeline. Projects affected by the measures may have been designed, specified, priced and contracted many months before the commencement of securities.

In these circumstances, builders may be placed in a double bind. They must either:

- absorb additional costs associated with securities and any subsequent duties; or
- incur the costs, delays and commercial risks associated with redesigning projects to accommodate alternative products.

Where projects are being delivered under fixed-price contracts, builders may have limited or no ability to recover either of these costs from clients. As a consequence, the impacts extend beyond product pricing and may affect project viability, delivery timeframes and broader construction activity.

In many instances, builders are unable to recover either the increased costs associated with securities and duties or the costs arising from redesign, re-specification and associated compliance activities. As a consequence, projects that were designed, priced and contracted prior to the commencement of the measures may be exposed to significant commercial impacts notwithstanding that key procurement and design decisions were made months earlier.

Master Builders submits that these circumstances should be carefully considered in assessing the likely impacts of any final measures on both commercial and residential construction projects.

Implementation and Transitional Considerations

Master Builders recognises that the Commission's role is to investigate and report in accordance with the statutory framework. Nevertheless, the practical realities of the building and construction industry suggest that particular consideration should be given to projects that were already in the design, procurement or contracting phase prior to the commencement of securities on 15 October 2026.

Builders may already be contractually committed to specified products and performance outcomes. In many instances, these commitments were entered into before the commencement of securities and on the basis of market conditions that existed at that time.

In many cases:

- key design decisions were made before the measures commenced;
- procurement decisions were based on market conditions that existed at the time of tender and contract execution;
- equivalent alternative products may not be readily available; and
- redesign may involve substantial cost, delay and additional compliance requirements.

Master Builders therefore encourages the Commission to consider whether its final recommendations appropriately recognise the long design and procurement cycles that characterise commercial and residential construction. Consideration should be given to whether available implementation mechanisms can mitigate unintended impacts on projects that were designed, specified, priced and contracted prior to the commencement of securities.

Evidence provided by Hacer also demonstrates that securities may apply to goods associated with contracts, purchase orders and procurement commitments entered into before 15 October 2026 where export occurs after that date. This creates particular challenges for projects already in the development pipeline and supports consideration of transitional arrangements for existing contractual commitments, projects already in production or procurement, and projects where equivalent alternative supply is not practically available within required delivery timeframes.

Master Builders does not contend that imported and domestically manufactured AWD do not compete within the same market. Rather, Master Builders submits that competition at a market level should not be assumed to establish practical substitutability at a project level. The evidence provided by members demonstrates that window systems are frequently embedded within design, compliance and contractual arrangements long before procurement occurs and may not be capable of substitution without redesign, delay and additional cost.

Master Builders therefore encourages the Commission to give further consideration to practical substitutability, domestic product availability, project-level impacts and implementation arrangements before final recommendations are made.

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4 November 2026

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Hacer Group submission to Master Builders Australia

Investigation No. 691: Aluminium windows and doors exported from the People's Republic of China

1 Purpose of this submission

Hacer Group provides this submission to support Master Builders Australia in responding to the Australian Trade Remedies Commission's Statement of Essential Facts in Investigation No. 691 concerning aluminium windows and doors exported from China.

For the purposes of this submission, "securities" means the provisional securities applying from 15 October 2026 in connection with potential anti-dumping and countervailing duties. The final form and amount of any measures remain subject to the Commission's final recommendation and the Minister's decision.

Hacer supports fair competition and recognises the importance of sustaining viable Australian manufacturing. However, the proposed measures have significant and potentially unintended consequences for builders, developers, workers, home purchasers and the delivery of new housing.

Hacer's concern is not limited to the future price of imported products. The immediate application of provisional securities from 15 October 2026 affects live construction projects that were priced, contracted, designed and procured before the preliminary measures were announced. Goods committed, ordered or paid for before 15 October 2026 may remain subject to securities if exported after that date.

For Hacer alone, a preliminary indicative estimate suggests potential exposure of approximately $8.315 million across five live projects, before detailed assessment of product dimensions, classification, exporter and supplier identity, customs value, import-entry treatment, contractual liability or available exclusions or exemptions. That scenario is based on an aggregate window-wall package value of approximately $23.574 million.

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The measures therefore require urgent consideration of:

(a) transitional relief for existing contracts and committed procurement;

(b) the immediate capacity of Australian manufacturers to supply the commercial multi-residential market;

(c) the proper treatment of window-wall systems;

(d) impacts on project feasibility, construction employment and business insolvency risk; and

(e) consistency with Australia's housing supply and affordability objectives.

2 Hacer's operations and use of window-wall systems

Hacer is a major Australian construction business delivering complex commercial and multi-residential projects. Aluminium window and window-wall packages are critical façade components in many of these projects.

In commercial and multi-residential construction, window-wall packages are not generic products that can readily be replaced by sourcing a different window from another supplier. They are project-specific, engineered systems developed in coordination with:

(a) the architectural design;

(b) structural and façade engineering requirements;

(c) waterproofing and fire-performance requirements;

(d) acoustic and thermal performance;

(e) building-services interfaces;

(f) façade access and construction methodology;

(g) mock-ups and performance testing;

(h) certification and building approval requirements;

(i) warranties and design responsibility; and

(j) the construction and procurement programme.

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A change of supplier or system after design development and procurement has commenced may require redesign, consultant review, changes to shop drawings, further samples or prototypes, additional performance testing, revised certification, new approvals and substantial changes to the project programme.

For live projects, this is not simply a choice between an imported and a locally manufactured equivalent product.

3 Immediate effect on Hacer's live projects

Hacer has identified five current projects involving window-wall packages manufactured or supplied from China. The aggregate package value is approximately $23.574 million. The preliminary estimated maximum securities exposure is approximately $8.315 million, representing approximately 35.3 per cent of that aggregate value. This estimate does not apply the dimensional limits in the goods description and remains subject to classification, exporter, customs and contractual analysis.

Hacer has identified five current projects involving window-wall packages sourced from China that may include goods within the scope of the provisional securities. The aggregate package value is approximately $23.574 million. Pending item-by-item product classification and dimensional analysis, Hacer has calculated an estimated potential exposure of approximately $8.315 million, representing approximately 35.3 per cent of that aggregate value. This is a scenario estimate only and remains subject to the goods description and dimensional limits, applicable exclusions or exemptions, exporter and supplier identity, export and entry dates, customs value, dumping export price, applicable DSN, exchange rates, Incoterms, importer-of-record arrangements and contractual allocation.

Indicative live-project exposure:

Location of Hacer project	Window-wall package value	Outstanding value	Assumed effective security rate	Estimated maximum exposure	Current status
Melbourne	$2,581,628	TBC	Nil	Nil	Podium completed; tower balcony window wall in progress
Melbourne	$6,930,000	$6,094,580	34.8%	$2,120,914	Approximately 4% arrived; dispatches ongoing
Ivanhoe	$7,075,636	$6,158,494	24.4%	$1,502,673	Approximately 5% arrived; remaining product on hold in China
Preston	$3,928,500	$3,342,000	73.3%	$2,449,686	No product arrived; remaining product on hold in China

South Yarra	$1,708,555 (Tower)	$1,708,555	73.3%	$1,252,371	Bulk production yet to commence
	$1,350,000 (Podium)	$1,350,000	73.3%	$989,550	Bulk production yet to commence
Total	**$23,574,319**			**$8,315,193**	

Source: Hacer's preliminary internal procurement assessment. The figures are estimates only and may change following product-scope, dimensional, exporter, customs, Incoterms and contractual analysis.

Four affected packages presently have indicative exposures exceeding $1 million, while two packages attract a preliminary rate of 73.3 per cent. Product for some projects is already in progress or being dispatched, while product for other projects is being held in China or has not entered bulk production. The data illustrates that the measures can have immediate consequences well beyond an incremental increase in tender pricing. They can interrupt production and shipping, destabilise fixed-price supply arrangements, place severe pressure on cash flow and threaten the timely completion of live projects.

4 Existing fixed-price contracts cannot readily absorb these costs

Building contracts are generally priced and entered into well before façade products are imported. The construction price, development feasibility and purchaser commitments may all have been established before fabrication or entry of goods for home consumption.

Many affected head contracts and subcontracts are fixed-price arrangements. The additional cost cannot be assumed to be recoverable from the principal, developer, subcontractor or purchaser. Contractual outcomes will depend on the precise terms of each agreement, including:

(a) responsibility for taxes, duties and customs charges;

(b) change-in-law provisions;

(c) variation and notice requirements;

(d) delay, extension-of-time and delay-cost provisions;

(e) Incoterms and the identity of the importer of record; and

(f) any limitations or exclusions applying to additional costs.

Where additional costs cannot be passed through, builders or façade subcontractors may be required to absorb substantial unpriced liabilities. Where the costs can be passed through, they may affect the feasibility and final cost of development.

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There is also a risk that the party legally responsible for the security may lack the liquidity or financial capacity to fund it, resulting in delayed shipments, insolvency, replacement procurement and downstream delay and loss. The consequences may include projects becoming loss-making; disputed change-in-law and variation claims; project delays and disruption; subcontractor or builder insolvency; cancellation or deferral of projects; reduced capacity to tender for new work; workforce reductions and higher development and housing costs.

5 Australian capability does not establish immediately available project capacity

Hacer acknowledges that Australia has established capability in the manufacture and processing of high-performance architectural glass and aluminium façade systems. The relevant issue for this investigation, however, is not simply whether components of a commercial façade can technically be manufactured in Australia. The practical question is whether Australian industry presently has sufficient available and substitutable capacity to design, engineer, fabricate, test and deliver complete project-specific window-wall packages at the scale, volume and within the programmes required for major multi-residential developments.

Commercial window wall is not simply a combination of glass and aluminium that can readily be sourced from alternative suppliers. A complete package involves an integrated solution encompassing, amongst other things:

(a) project-specific façade and structural engineering;

(b) aluminium framing systems, extrusions and associated components;

(c) high-performance glass selected to satisfy the project's thermal, acoustic, structural, safety and energy-performance requirements;

(d) fabrication and assembly;

(e) interfaces with slabs, fire stopping, waterproofing and other building elements;

(f) prototypes, samples and performance testing;

(g) certification and approval;

(h) transport and logistics;

(i) installation methodology and resources; and

(j) warranties and design responsibility.

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Each element must be available in the required quantity and within the project's design, procurement and construction programme.

Accordingly, evidence that Australian manufacturers possess the technical capability to manufacture performance glass, aluminium components or façade systems does not, of itself, establish that a complete locally manufactured window-wall solution is presently available as a practical substitute for an existing project-specific system.

Nor does an ability to increase Australian production over time resolve the position of live projects. If Australian manufacturers require a period of months to increase production or fabrication capacity, that distinction between capability and immediately available capacity is important. Live projects may already have completed substantial design development, supplier selection, shop drawings, prototypes or testing and may have entered production.

Changing supplier at that stage may require redesign, consultant review, revised shop drawings, new samples and prototypes, further performance testing, revised certification and approval and changes to the procurement and construction programme.

Hacer therefore submits that statements concerning Australian manufacturing capacity should be supported by evidence addressing the particular commercial market affected by the measures. Relevant matters include:

(a) current Australian fabrication capacity for commercial window-wall systems;

(b) existing committed production and genuinely available spare capacity;

(c) the number of Australian fabricators presently capable of supplying packages of the scale required for major multi-residential projects;

(d) achievable production volumes and lead times;

(e) capability to satisfy project-specific thermal, acoustic, structural, water-penetration and other performance requirements;

(f) capacity to undertake project-specific prototypes, testing and certification within existing programmes;

(g) limitations relating to module size, glass make-up, finishes or framing systems;

(h) availability of appropriately skilled installation resources;

(i) whether Australian manufacturers and fabricators actually tender for projects of this scale and nature; and

(j) the time and cost involved in transitioning a project that has already been designed and procured from an existing system and supplier to an Australian alternative.

6 Hacer's tendering experience does not demonstrate displacement of Australian suppliers

Hacer's own procurement experience is relevant to the proposition that imported Chinese window-wall products have displaced Australian-manufactured products in the commercial multi-residential market.

Hacer publicly advertises relevant tender opportunities through established construction procurement platforms, including EstimateOne. These opportunities are visible to prospective Australian manufacturers, fabricators and façade subcontractors, which are able to express interest in and tender for Hacer's work.

Hacer's procurement records do not indicate that Ventora Group (including its subsidiaries) (**Ventora**) has tendered for Hacer's relevant commercial window-wall packages.

This distinction is significant. Hacer's experience is not that Ventora tendered for these packages and was unsuccessful because it was undercut by a lower-priced Chinese manufacturer. Rather, Hacer's procurement records do not indicate that Ventora tendered for the work.

This does not, by itself, establish that Chinese imports have caused no injury to Ventora or to the broader Australian industry. Nor does it establish the position across the entire Australian market. It does, however, mean that Hacer's particular projects should not be characterised as identifiable lost tenders for Ventora without further evidence.

Where an Australian manufacturer submitted a conforming tender and lost the work because of the price effect of dumped imports, that provides direct project-level evidence of displacement. Where the manufacturer did not tender, there is no equivalent direct tender evidence. Further analysis is required to establish whether the manufacturer was willing and able to supply the package, whether it would have tendered in the absence of dumped imports, and whether price, rather than capacity, capability, programme, market participation or commercial strategy, explains its non-participation.

Hacer acknowledges the Commission's preliminary findings that the Australian industry participates across the identified market segments and has technical and available production capacity. Hacer's project-level evidence does not seek to establish the position across the entire Australian market. Rather, it raises a narrower question as to whether particular Hacer projects relied upon, expressly or implicitly, as evidence of displaced Australian demand were genuinely contestable opportunities pursued by the Australian industry.

Ventora's apparent non-participation in Hacer's relevant tender processes may indicate that Ventora does not presently participate in or actively pursue packages of the scale and complexity undertaken by Hacer. It may also raise questions as to whether Ventora had available capacity to service those packages within the required programme, although Hacer does not draw that conclusion merely from the absence of a tender.

Against those preliminary findings, Hacer considers Ventora's apparent non-participation in publicly advertised tender opportunities warrants further examination. If Ventora had both the technical capability and available capacity to service commercial window-wall projects of this nature, the reasons why it did not tender for Hacer's relevant packages may assist in determining whether price competition from Chinese imports, or other market, capability, programme or commercial considerations, explains its non-participation.

Where an Australian manufacturer did not tender for a Hacer project, there is no project-specific tender outcome demonstrating that the manufacturer lost that particular work because of Chinese pricing. The absence of a tender does not, by itself, prove why the manufacturer did not participate. It does, however, require further examination before the project is treated as a lost opportunity attributable to dumped imports.

Before concluding that Chinese window-wall imports displaced Australian production in this segment of the market, the Commission should examine actual tender participation and lost-opportunity evidence, including:

(a) which major commercial and multi-residential window-wall packages Ventora or other relevant Australian manufacturers tendered for during the investigation period;

(b) whether the allegedly displaced Australian supplier submitted a conforming tender for the particular project. Where no tender was submitted, the evidence supporting a conclusion that the Australian manufacturer would have pursued and supplied the opportunity in the absence of dumped imports;

(c) which tenders were unsuccessful because a Chinese supplier was selected;

(d) whether the Australian tender was unsuccessful because of price, technical capability, capacity, programme, system suitability, commercial terms or another reason;

(e) whether the allegedly lost opportunities were genuinely within the market serviced by the Australian manufacturer;

(f) whether the Australian manufacturer could have met the required design-development, testing, fabrication, delivery and installation programme; and

(g) where no Australian manufacturer tendered, the basis on which the project has been treated as demand displaced by imported goods, rather than demand that Australian industry was not presently seeking or able to service.

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The Commission should distinguish between an Australian manufacturer tendering for work and losing that work because of the price effect of dumped imports, and an Australian manufacturer not tendering because it does not participate in, actively pursue or have available capacity to service that market.

The first circumstance provides direct project-level evidence that an Australian supplier lost an identifiable tender to an imported product. The second does not provide that direct evidence and requires further analysis before the project can be treated as a lost opportunity attributable to dumped imports.

Hacer recognises that its procurement experience does not establish the position across the entire Australian market. However, it provides real project-level evidence that should be tested against any broader claim that Chinese imports have caused Australian manufacturers to lose commercial window-wall work.

This evidence is particularly important because the measures may impose substantial costs on commercial window-wall packages that Australian manufacturers have not historically pursued. In those circumstances, immediate securities may not restore existing work previously lost by Australian manufacturers. They may instead restrict or materially increase the cost of an established source of supply before an Australian replacement market has demonstrated the capacity and commercial appetite to service that demand.

Hacer therefore submits that the Commission should:

(h) seek and test evidence identifying the commercial window-wall tenders said to have been lost to Chinese suppliers;

(i) distinguish between actual lost tenders and projects for which the Australian manufacturer alleged to have been displaced did not tender;

(j) examine whether the allegedly displaced supplier had the capability and available capacity to meet the project requirements;

(k) avoid assuming, without evidence of competitive interaction and available supply, that the full value of Chinese commercial window-wall imports represents work that would otherwise have been supplied by Australian industry; and

(l) consider whether the absence of Australian tender participation supports separate treatment of the commercial window-wall market and transitional measures while Australian participation and capacity develop.

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7 Window-wall systems warrant separate consideration

The goods description includes aluminium window and door units within specified dimensions while excluding curtain-wall products. In the commercial multi-residential market, window wall can function as an integrated façade system. Although categorised differently from curtain wall, its design, procurement and construction characteristics can be materially different from ordinary domestic windows and doors.

For major projects, window wall commonly forms part of an engineered façade package involving repeated modules across a multi-storey building, slab-edge interfaces, fire-stopping, integrated spandrel and glazing components, project-specific structural and water testing, acoustic and energy requirements, and coordinated installation sequencing.

The inclusion of these systems may therefore have consequences materially different from those associated with standard domestic windows.

Hacer submits that the Commission should consider whether commercial window-wall systems are properly treated as part of the same competitive market as the goods predominantly produced and supplied by the applicant. In particular, the Commission should examine:

(a) whether the applicant and the Australian industry actually tender for and supply the relevant commercial window-wall market;

(b) whether locally produced products are practically substitutable in design, scale, testing, programme and price;

(c) whether the applicant lost identifiable commercial window-wall opportunities to dumped imports; and

(d) whether commercial window-wall systems should be excluded or separately treated.

8 Impact on housing supply and affordability

The measures should also be assessed against Australia's national housing supply and affordability objectives, including the National Housing Accord target of 1.2 million new well-located homes over five years from mid-2024.

The Commonwealth has committed substantial funding to support delivery, including $3.5 billion in payments to state, territory and local governments and programs directed to social and affordable housing.

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The National Housing Supply and Affordability Council reported in August 2026 that:

(a) house construction costs were 51 per cent higher than before the COVID-19 pandemic;

(b) rising construction costs may reduce the financial feasibility of housing projects and create near-term risks to housing supply; and

(c) the 1.2 million-home target was estimated to be reached only in the December quarter of 2030.

The Council has also reported that housing affordability continues to deteriorate and that construction-sector capacity and productivity need to improve.

In this environment, imposing substantial unanticipated costs on apartment and multi-residential projects risks working against the Government's objective of delivering more housing, more quickly and affordably.

The impact is not confined to a future increase in window prices. It can occur earlier in the development cycle by:

(a) making an approved or proposed project financially unviable;

(b) reducing the number of apartments or stages that proceed;

(c) delaying commencement while projects are repriced or redesigned;

(d) limiting the capacity of builders and subcontractors to take on new work;

(e) increasing insolvency risk and reducing construction capacity; and

(f) increasing the cost ultimately borne by developers, purchasers, renters or government-funded housing programs.

If the Government seeks to increase housing supply, measures that impose substantial costs on a key component of multi-residential construction should be accompanied by an assessment of their downstream effects on project feasibility and housing delivery.

Protection of Australian manufacturing and increased Australian housing supply are both legitimate policy objectives. The final recommendation should avoid pursuing one objective without properly accounting for serious and immediate harm to the other.

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9 Employment and construction-business impacts

The measures may produce employment consequences beyond the Australian window-manufacturing industry. For Hacer, the estimated potential exposure of approximately $8.315 million across five projects represents a material financial and operational burden. If substantial unbudgeted costs cannot be recovered or financed, affected businesses may face pressure to reduce overheads, constrain recruitment or reconsider workforce requirements.

There is also a broader employment risk if projects fail to achieve financial close, are delayed or cancelled, builders reduce tendering activity, development pipelines contract or construction activity is reduced. The resulting liquidity and programme pressures may increase insolvency risk for vulnerable participants in the façade and construction supply chain. In formulating its recommendations, and in any broader policy consideration by Government, the downstream consequences for employment, housing feasibility and construction-sector capacity should be expressly acknowledged.

10 Competition and feasibility consequences

If affected imports become impractical or commercially unviable before local capacity has increased, the measures may materially reduce the number of suppliers capable of tendering for complex commercial window-wall packages.

Reduced competition can lead to increased tender prices, longer lead times, reduced commercial pressure on programme and quality, dependence on a small number of suppliers, greater concentration and supply-chain vulnerability, and reduced ability to replace a supplier that encounters performance or solvency difficulties.

The Commission should distinguish between an improvement in trading conditions for Australian manufacturers and the creation of a short-term supply constraint in an already capacity-constrained construction market.

11 Transitional arrangements are necessary

Hacer considers that the strongest and most immediate form of relief is an effective transition for projects and procurement commitments established before the provisional securities commenced. The present position is particularly harsh because an order or payment made before 15 October 2026 does not, by itself, prevent securities applying if export occurred after that date.

Hacer recognises that some of the following outcomes may require a product-scope determination, exemption process, modification of the recommended measures, transitional administrative treatment or a separate policy decision by Government. Hacer nevertheless asks Master Builders Australia to pursue them through all available channels.

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Hacer recommends that Master Builders Australia request (or continue to reinforce) that the Commission and Minister consider the following relief:

(a) **Exclude or separately treat commercial window wall**. Provide separate treatment for project-specific window-wall systems used in Class 2 to 9 buildings where equivalent Australian supply is not reasonably available within the required programme.

(b) **Grandfather pre-existing commitments**. Exempt goods supplied under building contracts, subcontracts or binding tenders, contractual commitments or purchase orders entered into before 15 October 2026.

(c) **Protect goods already in the procurement cycle**. Extend transitional treatment to goods in design development, approved, in production, paid for or contractually committed before 15 October 2026, even if not yet exported.

(d) **Provide a minimum 12-month transition**. If full grandfathering is not accepted, the measures should be suspended or phased in for at least 12 months. This would provide an opportunity for Australian manufacturers and fabricators to demonstrate and, where necessary, increase the production, fabrication, testing and delivery capacity required to service the commercial window-wall market, while allowing affected projects a reasonable period to investigate and implement alternative design and procurement arrangements.

(e) **Create a project-specific exemption**. Permit relief where procurement was committed before 15 October 2026, changing supplier requires material redesign or retesting, equivalent local supply is unavailable within programme, or the measure materially threatens project feasibility.

(f) **Undertake a housing-impact assessment.** Assess effects on apartment construction, social and affordable housing, project feasibility and the National Housing Accord target in connection with the Commission's final recommendation and the Minister's consideration of any final measures.

(g) **Monitor capacity and market effects**. Subject final measures to early review against Australian supply capacity, lead times, tender participation, prices, project delays and housing-project deferrals or cancellations.

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12 Matters to be addressed in the final report

Hacer suggests that the final report expressly addresses:

(a) the treatment of existing fixed-price construction contracts;

(b) the inability of builders automatically to pass through additional duties;

(c) the position of businesses that are not the importer of record but remain exposed to delay, insolvency and replacement costs;

(d) the distinction between general window-manufacturing capacity and project-specific commercial window-wall capability;

(e) current, rather than prospective, Australian production capacity;

(f) the time and cost involved in redesigning and retesting a façade system;

(g) whether Australian industry actively tendered for the commercial window-wall projects said to have been lost to imported goods;

(h) potential impacts on housing feasibility and delivery;

(i) employment impacts across the broader construction sector; and

(j) transitional arrangements for contracts and procurement commitments predating 15 October 2026.

13 Conclusion

Hacer's live-project data demonstrates that the preliminary measures can create substantial and immediate impacts on builders and construction projects. The estimated potential exposure of approximately $8.315 million across five Hacer projects is not an ordinary future price adjustment. It concerns projects that have already been contracted, designed and procured and, in some cases, materials which are already in production or shipment.

The consequences may include substantial unrecoverable cost, project delay, contractual disputes, subcontractor insolvency, reduced construction employment and the deferral or cancellation of housing projects.

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Hacer supports measures that promote fair competition and sustainable Australian manufacturing. However, the measures should not impose substantial new costs on existing contractual and procurement commitments without appropriate transitional treatment, or assume that prospective local capacity is immediately substitutable for established project-specific supply.

Hacer therefore recommends that Master Builders Australia seek, as a priority:

(a) grandfathering or transitional protection for existing contracts and committed procurement;

(b) exclusion or separate treatment of commercial window-wall systems;

(c) a project-specific exemption where equivalent local supply is not practically available;

(d) a proper assessment of downstream housing, employment and insolvency effects; and

(e) consideration of the national interest and Government housing-supply and affordability objectives in connection with the Commission's final recommendation and the Minister's consideration of any final measures.

For the avoidance of doubt, this submission is confidential and provided to Master Builders Australia to support its submission to the Australian Trade Remedies Commission.

Yours sincerely,

Hacer Group

Attachment B

Response to SEF 691 — Observations from Australian Construction Industry Participants

Submission on Investigation No. 691

1. About ABPA VIC and our position

ABPA VIC (Australian Building & Property Association VIC Inc.) is a non-profit association supporting building and property businesses. We have 190 corporate members in Victoria, including builders, developers, trades, suppliers and consultants.

Our members work mainly on detached homes and medium-density townhouses, as well as apartments, commercial construction, EBA projects and PSP land developments. **These businesses and their projects provide ongoing income for thousands of workers and employees.**

We recognise the importance of fair competition, Australian manufacturing and local employment. We also ask the Commission to consider Australian businesses and workers who depend on reliable supply, reasonable procurement costs and projects proceeding.

Our comments reflect industry discussions, firsthand observations and community feedback, rather than a systematic market survey.

2. Market observations

From our experience, local products are common in government and school projects. Volume builders also frequently use local products, which offer competitive pricing and delivery for standardised requirements.

Some mid-range and high-end residential projects have shifted from Australian-made products to Chinese imports. We acknowledge the resulting loss of business for some local manufacturers and understand their concerns.

However, the reasons for this shift need consideration. Builders and local window and door contractors base procurement decisions on price, performance, design, specifications and delivery.

3. Further cost increases may deepen project stagnation

Recent feedback indicates that **many Victorian developers and investors have suspended substantial numbers of projects**, citing interest costs, taxes, construction costs and weak sales.

Further construction cost increases at this point may encourage developers to cancel projects that have not commenced.

Many importers face an anti-dumping-related rate of 24.4%. With local quotations already substantially higher for some projects, either continuing imports or switching locally may exceed existing budgets.

For projects with fixed-price contracts, agreed sale prices or established budgets, builders or local window and door contractors may have to absorb the additional costs. For uncommenced projects, higher costs may determine whether they proceed.

We work daily with small and medium-sized projects and are sensitive to how price changes affect budgets, contracts, procurement and trade scheduling.

We fear the measures may deepen industry stagnation. For projects already near the financial viability threshold, additional costs may be the final factor preventing them from proceeding.

4. Fewer imports do not necessarily mean equivalent local orders

Some demand may shift to local manufacturers. Other projects may be delayed, reduced or cancelled because alternatives cannot meet budgets, specifications or delivery requirements.

Local alternatives must therefore be assessed against each project's specifications, quantities, budget and timeframe. Cancelled projects affect local manufacturers, suppliers, installers and construction workers as well as importers.

5. Matters for consideration

We respectfully ask the Commission, within its remit, to:

1. **Consider market differences:** assess local alternatives against specifications, performance, price and delivery.
2. **Consider contracted and ongoing projects:** account for existing commitments and the costs and delays of changing suppliers.

3. **Assess downstream impacts:** consider pressures on Australian builders, window and door suppliers and installers, subcontractors and employment.
4. **Assess local capacity and pricing:** local manufacturing recovery requires supply and demand to grow progressively together. A sudden demand shift into limited capacity may encourage further price increases. Local prices should not be assumed to remain unchanged as import costs rise.

Closing

ABPA VIC supports fair competition and Australian manufacturing. We also ask that decisions consider thousands of Australian businesses and workers throughout construction.

Our members operate Australian businesses, employ workers and deliver local projects. Their concerns are continued business operations, project completion and ongoing income for employees and partners.

We ask the Commission to consider these firsthand observations and how additional costs may affect project viability and commencement.

On behalf of ABPA VIC

Australian Building & Property Association VIC Inc.

ABPA

Attachment C

AOKAI
Jiangmen Aokai Building Materials Co., Ltd.
Add.:Building 3, Simei Road, Lianhe Village, Sanjiang Town, Xinhui District, Jiangmen City, Guangdong Province, China

Subject: Declaration of No Government Special Subsidies

Aluminium windows and doors from China

NON-CONFIDENTIAL VERSION

Date: 6 November 2026
Submitting party: Jiangmen Aokai Building Materials Co., Ltd
Role: Exporter from the People's Republic of China
Contact and signatory: Wenhong Liu, General Manager
Email: sales@jmaokai.com Tel.: +86 15079218332, +86 13425468255
Confidentiality: No confidentiality claim is made. All information may be published.

To: The Director - Master Builders Australia
By email: info@abpavic.org.au

Dear Director,

We, Jiangmen Aokai Building Materials Co., Ltd., a company duly established and registered under the laws of the People's Republic of China, hereby declare that:

Our company has not received any special financial assistance, subsidies, grants, or other preferential financial support from the Chinese Central Government or any local government authorities.

Our company has not benefited from any government-funded subsidy programs or special financial incentives specifically provided by the Chinese government in relation to the manufacture, production, sale, or export of aluminium windows, doors, or related building products.

We confirm that the information provided in this declaration is true, accurate, and complete to the best of our knowledge and belief.

We understand that this declaration may be submitted by Master Builders Australia to the relevant Australian authorities or commission for consideration in connection with the aluminium windows and doors anti-dumping matter.

We hereby make this declaration in good faith and accept responsibility for the accuracy of the information provided herein.

Yours faithfully,

Wenhong Liu
General Manager
For and on behalf of
Jiangmen Aokai Building Materials Co., Ltd

Wenhong Liu
2026.11.6

Public record references

[1] Investigation 691, EPR document 501, Statement of Essential Facts No. 691, 14 October 2026. Electronic Public Record: 691 Aluminium windows and doors from China. Section and printed page references are given in the text. Official SEF 691

[2] Investigation 691, EPR document 516, Frequently Asked Questions, published 28 October 2026, p 1. Official FAQs

[3] Australian Trade Remedies Commission, How to apply for an exemption, September 2026, pp 5-6 and 8-10. Exemption guidelines

Attachment D

FORMAL STATEMENT – NO GOVERNMENT SPECIFIC SUBSIDIES

To: Master Builders Australia (MBA)

For submission to the Australian Anti- Dumping Commission (ADC)

Investigation Case No.691: Aluminium Windows and Doors from PRC

Company Name: Zhejiang Zhongliang Curtain Wall Engineering Co., Ltd.

Registered Address: Quzhou City, Zhejiang Province, P.R.China

Product under investigation: Fabricated aluminium windows, doors and curtain wall systems

This statement is submitted in connection with the anti- dumping and countervailing duty investigation (Case 691) initiated by the Anti- Dumping Commission of Australia. The Company solemnly declares as follows:

1. During the relevant investigation period, the Company has NOT applied for, received or benefited from any specific government grants, subsidies, interest discounts, earmarked incentives or other countervailable financial support from any level of Chinese government that are targeted at the subject aluminium window & door products exported to Australia.

2. The Company may access general nationwide preferential tax or social security policies available to all eligible enterprises in China. These general, non- specific policies are NOT countervailable subsidies for the purpose of this investigation, and they are not limited to our company or our export products.

3. Our manufacturing, pricing and export sales to Australia are determined purely on a commercial, market- oriented basis. All raw material procurement, production and export pricing decisions are made independently without reliance on any specific government financial support.

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4. The information contained in this statement is true, accurate and complete to the best of our knowledge. The Company consents to further verification by the Australian Anti- Dumping Commission and accepts legal liability for any false or misleading statement.

This statement will be lodged by Master Builders Australia together with its submission to the Commission. We respectfully request the Commission take this statement into account when assessing countervailing allegations and determining the applicable duty rate for our company.

Signature of Authorised Signatory: Yang Liu Song

Name: Yang Liu Song

Title: Manager

Contact Email: 2314bb23@qq.com

Contact Phone: 13621970127

Company Seal: Zhejiang Zhongtai Curtain Wall Engineering Co., Ltd.

浙江中泰幕墙工程有限公司
ZHEJIANG ZHONGTAI CURTAIN WALL ENGINEERING CO.,LTD

Date: 11/2026

正式声明——无政府专项补贴

致：澳大利亚建筑商协会（MBA）

提交至：澳大利亚反倾销委员会（ADC）

调查案号：691：原产于中国的铝制门窗

企业名称：浙江中楝幕墙工程有限公司

注册地址：中华人民共和国浙江省衢州市

涉案产品：成品铝制门窗及幕墙系统

本声明系针对澳大利亚反倾销委员会发起的第691号反倾销、反补贴调查案件提交。本公司郑重声明如下：

一、在本次调查对应的调查期内，本公司未申请、未收取、亦未享有中国各级政府针对出口至澳大利亚的涉案铝门窗产品所提供的任何专项政府补助、补贴、财政贴息、定向扶持奖励及其他可实施反补贴征税的财政扶持政策。

二、本公司依法享有中国境内面向全部合规企业的全国统一普惠性税收优惠、社会保障相关扶持政策。上述普遍性、非专项性政策不属于本次调查项下可认定的反补贴税补贴范畴，且该类政策不专门针对本公司，亦不专门针对本公司对澳出口产品。

三、本公司的生产经营、产品定价及对澳出口销售行为，完全遵循市场化、商业化原则自主开展。所有原材料采购、生产排产、出口定价等经营决策均由公司独立完成，不依赖任何政府专项财政资金支持。

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四、本公司保证本声明所载全部内容真实、准确、完整。本公司同意澳大利亚反倾销委员会对相关信息开展进一步核查，并承诺对任何虚假、误导性陈述承担全部相应法律责任。

本声明将由澳大利亚建筑商协会（MBA）随案一并提交澳大利亚反倾销委员会。恳请委员会在审理本次反补贴指控、核定本公司适用税率时，采信并参考本声明内容。

授权签字人签字：

姓名：杨柳松

职务：经理

联系邮箱：22314bb23@qq.com

联系电话：13623801[illegible]

公司公章：浙江中煤幕墙工程有限公司

日期：6/11/2026

浙江中煤幕墙工程有限公司
ZHEJIANG ZHONGLIANG CURTAIN WALL ENGINEERING CO.,LTD

Attachment E

Foshan Zhangmenren Building Materials Co., Ltd

Address: __528225 ,Building 6,Yiqiying Industrial Park, Xingye North Road, Shishan Town, Nanhai District, Foshan, Guangdong, China__
Contact: __Jayron_____ ABN: ____/_____
Email: ____Jayron@zmrdoor.com_____ Tel: +86 18476269691_____

To: The Commissioner, Australian Trade Remedies Commission

Attn: Investigations 1 Team

Date: __2026.11.3_____ Reference No.: ____NO.691_____

SUBMISSION IN RESPONSE TO STATEMENT OF ESSENTIAL FACTS NO. 691 — REQUEST FOR REVIEW OF THE PRELIMINARY DUMPING MARGIN

Dear Commissioner,

We,Foshan Zhangmenren Building Materials Co., Ltd. ("Zhangmenren") hereby submit this response to the Statement of Essential Facts No. 691 (SEF 691) and respectfully request a review of our preliminary dumping margin in relation to the investigation into aluminium windows and doors exported from the People's Republic of China.

1. Cooperation with the Investigation

We have cooperated fully with the investigation from the outset and were classified as a residual exporter in the Commissioner's preliminary affirmative determination, with a preliminary dumping margin of 24.4%. We have provided the information requested of us to the best of our ability and remain fully willing to furnish any further data the Commission may require to verify our circumstances.

2. No Government Subsidies Received

We respectfully submit that, in the course of our sales to the Australian market, we have not applied for, and have not received, any government subsidy. We therefore submit that the countervailing element attributed to our exports should not apply, and request that the relevant subsidy margin be reviewed accordingly.

3. Selling Prices Above Market Level — No Dumping

Our selling prices to the Australian market have been maintained above prevailing market levels. We respectfully submit that our actual export prices do not give rise to dumping of the goods, and request that the Commission review the calculation of our

dumping margin based on our actual verified selling prices and costs, rather than on residual assumptions.

4. High-End Energy-Efficient Product Positioning

Our factory specialises in high-end thermally broken and energy-efficient system windows and doors. Our products primarily serve cold and high-insulation regions including the United States, Canada and Europe, where they have obtained recognised energy-efficiency certifications such as ENERGY STAR. These certifications demonstrate that our products meet stringent climatic and energy-saving requirements.

5. Contribution to Australian Public Interest

Our products are highly aligned with the energy-efficiency certification direction being promoted in Australia and can materially assist Australia in reducing energy waste in the built environment. In addition, the product category we supply is not currently manufactured by Australian door and window producers. Accordingly, our exports do not constitute dumping that causes material injury to the Australian industry; rather, they bring tangible energy-saving benefits to Australian consumers and the public interest.

6. Request

In light of the above, we respectfully request that the Commission review our preliminary dumping margin and take into account our full cooperation, the absence of any subsidy, our above-market selling prices, and the significant public-interest and energy-saving benefits our products deliver. We ask that a lower interim and final rate of duty — or, where appropriate, an exemption — be applied, so as to reduce the cost for Australian consumers of adopting high-efficiency window and door systems.

7. Conclusion

We are grateful for the opportunity to respond and remain committed to cooperating fully with the Commission throughout this process. We respectfully trust that our submission will be given due consideration, and we thank the Commission for its time.

Yours faithfully,

Authorized Representative: Jayron

Signature: Jayron

Title: CEO

Date: November 3rd, 2026

Company Seal (Company Chop):



Attachment F

PINNACLE FACADE PTY LTD

Unit 1A/475 Blackburn Road, Mount Waverley,
VIC 3149

ACN: 668 656 951
ABN:14 668 656 951

Statement Regarding Chinese Government Subsidies and Financial Assistance

Pinnacle Facade and Guangdong Painigao Muqiangzhuangshi hereby declare that we have not received any direct or indirect government subsidies, grants, funding, or financial assistance from the Government of the People's Republic of China or any affiliated government entities.

We confirm that this declaration is true and accurate to the best of our knowledge.

Director: Joey Zuo

Signature: Joey Zuo

Date:05/11/2026

Attachment G

From: Dyan Johnson
Sent: Wednesday, 28 October 2026 12:29 PM
To: Melissa Byrne
Cc: Michael Hopkins - MBQ
Subject: Glazing quotes

Mel,

Here is information on a four house project in Brisbane where the existing design, could not be delivered with Australian glazing. To proceed with the more expensive Australian glazing and still hit the EE requirements there needed to be a significant redesign of the project. A cost in itself and a suboptimal outcome.

From: Ben Driessen
Sent: Thursday, 5 March 2026 1:42 PM
Subject: Re: G James Quote Request

Hello Mitch,

Ana has asked me to have a look at these for you.

If the energy reports are set in stone, we will not be able to quote these as they are.

For example, we won't be able to do any of the louvre or double hung windows as they won't meet the energy numbers.

Some of the numbers we will not be able to supply anything that will comply and some of them will have to be thermally broken windows/doors of which we have a limited range of.

I would suggest that you revisit the energy reports to see if there are any other things you can adjust/change/add to the building to get the numbers back to a reasonable point

(single glazed low E as a minimum would be achievable for most items listed in the window and door schedules). I'm not sure if this will be possible or not, but a U-Value around the 5 mark would, for the most part, work.

Please feel free to call me to discuss (I did try to call you earlier).

Regards, Ben.

Sent: Wednesday, 28 October 2026 12:21 AM
Subject: Supply comparisons Window Glazing

Please see below a comparison of window supply pricing across the four lots, highlighting the significant cost difference between Australian-sourced and imported products.

Dowell (G James) – Australian Supplier

- Lot 1 – $38,748
- Lot 2 – $30,604
- Lot 3 – $27,221
- Lot 4 – $25,807

Total: $122,380

It is important to note that this pricing includes single-glazed products and substituted window configurations that do not fully align with the original specifications.

AMJ – Overseas Supplier

Total for all four lots: $102,073

This pricing includes:

- Double glazing throughout all four lots.
- Thermally broken aluminium frames as required.
- Freight and international shipping.

Cost Comparison

The overseas supplier provides a saving of **$20,307 (16.6%)** compared with the Australian supplier, despite offering a higher-performing product that aligns with the project's glazing and thermal requirements.

This highlights the challenges builders are facing in meeting increasingly stringent 7-star energy efficiency requirements while maintaining commercially viable construction costs.

In this instance, the imported product not only meets the specified performance requirements but also delivers a substantial cost saving, inclusive of international freight.

Importantly, this is not a like-for-like comparison, as the Australian quotation includes lower-performing glazing and substituted configurations. The actual cost difference for equivalent compliant products could therefore be greater.

We believe this provides a practical example of the cost and procurement pressures currently affecting residential construction in Queensland

Kind Regards,
Dyan Johnson
General Manager - Policy & Advocacy

MASTER BUILDERS QUEENSLAND
The home of building

mbqld.com.au

417 Wickham Terrace, Brisbane Qld 4000



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Shenzhen AMJ Technology CO.,LTD

Contacts:Carl Cai Email: amj31@aubuilding.com Mobile: +86 15089143783
Website: www.aubuilding.com Tel: 0755-28283230

Quotation

					DATE	2026/4/23	
Buyer	Mitch				Invoice No.	AMJ202604	
Consignee		Project	LOT 1, 43 KIMRUSKA PLACE THE GAP QLD 4061	From: AMJ	Trading Terms	DDP(Deliver to job site including 10%gst)	
				To: **Brisbane**	Payment	T/T 50% advance,50% balance before shipment	

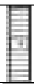
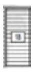
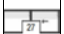
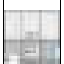
Aluminium Windows & Doors

Location	WINDOW CODE	Design	Description	Glass	Hardware	Flyscreen	Profile Color	Size(mm) W	Size(mm) H	Area/set (㎡)	QTY Set	TOTAL AREA (㎡)	Unit-Price AUD/㎡	Unit-Price AUD/Set	AMOUNT AUD
GF-ENTRY	W01		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	600	2400	1.44	1	1.44	183	263	263
GF-PDR	W02		SLIDING WINDOW	**5mm low-e+8Argon+5mm double tempered clear glass**	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	1200	600	1.50	1	1.50	207	310	310
GF-LAUNDRY	W03		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	900	2400	2.16	1	2.16	183	394	394
GF-[AMTRY	W04		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	900	2700	2.43	1	2.43	183	444	444
GF-LIVING	W08		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	900	2700	2.43	1	2.43	183	444	444
FF-BED2	W12		SLIDING WINDOW	**5mm low-e+8Argon+5mm double tempered clear glass**	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	2700	600	2.00	1	2.00	219	438	438
FF-BED3	W13		SLIDING WINDOW	**5mm low-e+8Argon+5mm double tempered clear glass**	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	2700	600	2.00	1	2.00	219	438	438
FF-BED4	W14		SLIDING WINDOW	**5mm low-e+8Argon+5mm double tempered clear glass**	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	2700	600	2.00	1	2.00	219	438	438
FF-ENSUITE	W15		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	900	1200	1.08	1	1.08	183	197	197
FF-WIR	W17		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	900	1200	1.08	1	1.08	183	197	197
FF-MASTER BED	W18		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	900	1500	1.35	1	1.35	183	247	247
FF-MASTER BED	W21		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	900	1500	1.35	1	1.35	183	247	247
FF-SHR	W22		SLIDING WINDOW	**5mm low-e+8Argon+5mm double tempered clear glass**	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ81 semi-commercial series)**	1500	600	1.50	1	1.50	219	328	328
FF-RUMPUS	W23		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	900	1500	1.35	1	1.35	183	247	247
/	W25		AWNING WINDOW	5mm+12A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	1500	600	1.00	1	1.00	219	219	219
GF-PANTRY	W27		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	900	2700	2.43	1	2.43	183	444	444
GF-MUD	D02		CASEMENT DOOR	**5mm low-e+12Argon+5mm double tempered clear glass**	AMJ standard hardware	/	**powder coated custom colour (AMJ80T thermal broken series)**	820	2340	1.92	1	1.92	263	505	505
GF-LIVING	D03		STACKER DOOR(SSSF)	**5mm low-e+12A+5mm double tempered clear glass**	**Australia Brand Ciilock D Handle**	0.5mm Stainless flyscreen	**powder coated custom colour (AMJ100T thermal broken series)**	3600	2700	9.72	1	9.72	300	2915	2915
GF-LIVING	D04		STACKER DOOR(SSSF)	**5mm low-e+12A+5mm double tempered clear glass**	**Australia Brand Ciilock D Handle**	0.5mm Stainless flyscreen	**powder coated custom colour (AMJ100T thermal broken series)**	3600	2700	9.72	1	9.72	300	2915	2915
GF-GARAGE	D12		CASEMENT DOOR	5mm+12A+5mm double tempered clear glass	AMJ standard hardware	/	powder coated custom colour **(AMJ100L full commercial series)**	820	2400	1.97	1	1.97	215	423	423
GF-KITCHEN	D25		STACKER DOOR(SSSF)	**5mm low-e+12A+5mm double tempered clear glass**	**Australia Brand Ciilock D Handle**	0.5mm Stainless flyscreen	**powder coated custom colour (AMJ100T thermal broken series)**	3600	2700	9.72	1	9.72	300	2915	2915
										Total	29	80.49			AUD 18,079
														Timber reveal material charge	**AUD 2,226**
														Upgraded Steel framed pallet packaging charge	**AUD 685**

Fiberglass flyscreen for all openable windows		**AUD 323**
0.5mm Stainless flyscreen for Stacker doors(D03,D04,D25)		**AUD 776**
EXW Total Value		**AUD 22,089**

Buyer						Invice No.	AMJ202602
Consignee		Project	LOT 2, 43 KIMRUSKA PLACE THE GAP QLD 4061	From:	AMJ	Trading Terms	DDP(Deliver to job site including 10%gst)
				To:Brisbane		Payment	T/T 50% advance,50% balance before shipment

Aluminium Windows & Doors

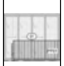
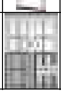
Location	WINDOW CODE	Design	Description	Glass	Hardware	Flyscreen	Profile Color	Size(mm) W	Size(mm) H	Area/set (㎡)	QTY Set	TOTAL AREA (㎡)	Unit-Price AUD/㎡	Unit-Price AUD/Set	AMOUNT AUD
GF-LIVING	W05		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	900	2100	1.89	1	1.89	183	345	345
GF-LIVING	W06		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	900	2100	1.89	1	1.89	183	345	345
GF-KITCHEN	W08		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	900	1800	1.62	1	1.62	183	296	296
GF-KITCHEN	W10		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	900	1800	1.62	1	1.62	183	296	296
GF-PDR	W11		DOUBLE HUNG WINDOW	5mm lowe+9A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80T thermal broken series)**	600	900	1.00	1	1.00	305	305	305
GF-PANTRY	W12		SLIDING WINDOW	5mm+8A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	1500	600	1.50	1	1.50	207	310	310
/	W13	/	SLIDING WINDOW	5mm+8A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	2100	600	2.00	1	2.00	207	414	414
GF-WIR	W14		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	600	2100	1.26	1	1.26	183	230	230
FF-MASTER BEDROOM	W15		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	900	2100	1.89	1	1.89	183	345	345
FF-MASTER BEDROOM	W18		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	900	2100	1.89	1	1.89	183	345	345
FF-LINEN	W21		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	900	1500	1.35	1	1.35	183	247	247
FF-PDR	W25		AWNING WINDOW	6mm lowe+12Argon+6mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	600	600	1.00	1	1.00	237	237	237
FF-BATH	W27		SLIDING WINDOW	5mm+8A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	1500	600	1.50	1	1.50	207	310	310
FF-BEDROOM 4	W28		SLIDING WINDOW	5mm+8A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	2700	900	2.43	1	2.43	207	503	503
FF-ENSUITE	W29		DOUBLE HUNG WINDOW	5mm lowe+9A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80T thermal broken series)**	600	900	1.00	1	1.00	305	305	305
FF-BEDROOM 2	W31		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	900	1500	1.35	1	1.35	183	247	247
FF-BEDROOM 2	W32		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	900	1500	1.35	1	1.35	183	247	247
FF-BEDROOM 3	W38		SLIDING WINDOW	5mm+8A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	2700	900	2.43	1	2.43	207	503	503
GF-LIVING TFB01	D02		STACKER DOOR(SSF)	5mm lowe+9Argon+5mm double tempered clear glass	**Australia Brand Ciilock D Handle**	0.5mm Stainless flyscreen	**powder coated custom colour (AMJ100T thermal broken series)**	3000	2700	8.10	1	8.10	279	2259	2259
GF-KITCHEN	D03		STACKER DOOR(SSF)	5mm lowe+9Argon+5mm double tempered clear glass	**Australia Brand Ciilock D Handle**	0.5mm Stainless flyscreen	**powder coated custom colour (AMJ100T thermal broken series)**	3000	1800	5.40	1	5.40	279	1506	1506
GF-GARAGE	D04		CASEMENT DOOR	5mm lowe+12Argon+5mm double tempered clear glass	AMJ standard hardware	/	**powder coated custom colour (AMJ100T thermal broken series)**	820	2340	1.92	1	1.92	293	563	563
										Total	32	68.10			AUD 14,384

Timber reveal material charge		**AUD 1,884**
Upgraded Steel framed pallet packaging charge		**AUD 580**

Fiberglass flyscreen for all openable windows		**AUD 364**
0.5mm Stainless flyscreen for Stacker doors(D02,D03)		**AUD 359**
EXW Total Value		**AUD 17,570**

Buyer						Invice No.	AMJ202602
Consignee		Project	LOT 3, 43 KIMRUSKA PLACE THE GAP QLD 4061	From:	AMJ	Trading Terms	DDP(Deliver to job site including 10%gst)
				To:Brisbane		Payment	T/T 50% advance,50% balance before shipment

Aluminium Windows & Doors

Location	WINDOW CODE	Design	Description	Glass	Hardware	Flyscreen	Profile Color	Size(mm)		Area/set	QTY	TOTAL AREA	Unit-Price	Unit-Price	AMOUNT
								W	H	(㎡)	Set	(㎡)	AUD/㎡	AUD/Set	AUD
/	W04	/	DOUBLE HUNG WINDOW	5mm lowe+9A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80T thermal broken series)**	900	2700	2.43	1	2.43	305	742	742
GF-LIVING	W05		DOUBLE HUNG WINDOW	5mm lowe+9A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80T thermal broken series)**	900	2700	2.43	1	2.43	305	742	742
GF-LIVING	W06		DOUBLE HUNG WINDOW	5mm lowe+9A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80T thermal broken series)**	600	1500	0.90	1	0.90	305	275	275
GF-LIVING	W08		DOUBLE HUNG WINDOW	5mm lowe+9A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80T thermal broken series)**	600	2700	1.62	1	1.62	305	495	495
FF-TFB01	W10		DOUBLE HUNG WINDOW	5mm lowe+9A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80T thermal broken series)**	900	2900	2.61	1	2.61	305	797	797
FF-RUMPUS	W11		DOUBLE HUNG WINDOW	5mm lowe+9A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80T thermal broken series)**	900	2100	1.89	1	1.89	305	577	577
FF-RUMPUS	W12		DOUBLE HUNG WINDOW	5mm lowe+9A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80T thermal broken series)**	900	2100	1.89	1	1.89	305	577	577
FF-MASTER BEDROOM	W13		DOUBLE HUNG WINDOW	5mm lowe+9A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80T thermal broken series)**	900	2100	1.89	1	1.89	305	577	577
FF-BEDROOM 2	W17		SLIDING WINDOW	5mm lowe+12A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ100T thermal broken series)**	2700	900	2.43	1	2.43	291	706	706
FF-BEDROOM 3	W18		SLIDING WINDOW	5mm lowe+12A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ100T thermal broken series)**	2700	900	2.43	1	2.43	291	706	706
FF-BEDROOM 4	W19		SLIDING WINDOW	5mm lowe+12A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ100T thermal broken series)**	2700	900	2.43	1	2.43	291	706	706
FF-GARAGE	W20		SLIDING WINDOW	5mm lowe+12A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ100T thermal broken series)**	3600	600	2.16	1	2.16	291	628	628
GF-DINING	W21		DOUBLE HUNG WINDOW	5mm lowe+9A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80T thermal broken series)**	900	2700	2.43	1	2.43	305	742	742
GF-KITCHEN	W22		DOUBLE HUNG WINDOW	5mm lowe+9A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80T thermal broken series)**	600	2700	1.62	1	1.62	305	495	495
FF-BATH	W30		DOUBLE HUNG WINDOW	5mm lowe+9A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80T thermal broken series)**	600	900	1.00	1	1.00	305	305	305
FF-SHR	W31	/	DOUBLE HUNG WINDOW	5mm lowe+9A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80T thermal broken series)**	1200	600	1.00	1	1.00	305	305	305
FF-BEDROOM 2	W32		DOUBLE HUNG WINDOW	5mm lowe+9A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80T thermal broken series)**	900	2400	2.16	1	2.16	305	660	660
GF-LIVING	W36		DOUBLE HUNG WINDOW	5mm lowe+9A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80T thermal broken series)**	600	1500	1.00	1	1.00	305	305	305
/	W40	/	DOUBLE HUNG WINDOW	5mm+9A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	900	2100	1.89	1	1.89	284	538	538
GF-DINING	D01		STACKER DOOR(SSSF)	5mm lowe+12Argon+5mm double tempered clear glass	Australia Brand Ciilock D Handle	0.5mm Stainless flyscreen	powder coated custom colour **(AMJ100T thermal broken series)**	3300	2640	8.71	1	8.71	300	2613	2613
GF-LAUNDRY	D05		CASEMENT DOOR	5mm lowe+12Argon+5mm double tempered clear glass	AMJ standard hardware	/	**powder coated custom colour (AMJ100T thermal broken series)**	820	2340	1.92	1	1.92	293	563	563
FF-TFB01	D06		CASEMENT DOOR	5mm lowe+12Argon+5mm double tempered clear glass	AMJ standard hardware	/	**powder coated custom colour (AMJ100T thermal broken series)**	1640	2340	3.84	1	3.84	293	1125	1125

GF-DINING	D21		STACKER DOOR(SSSF)	6mm low-e+12Argon+5mm double tempered clear glass	Australia Brand Cillock D Handle	0.5mm Stainless flyscreen	powder coated custom colour **(AMJ100T thermal broken series)**	3300	2640	8.71	1	8.71	300	2613	2613
										Total	29	74.25			AUD 19,918
														Timber reveal material charge	**AUD 2,054**
														Upgraded Steel framed pallet packaging charge	**AUD 632**
														Fiberglass flyscreen for all openable windows	**AUD 384**
														0.5mm Stainless flyscreen for Stacker doors(D01,D21)	**AUD 463**
														EXW Total Value	**AUD 23,451**

Buyer						Invice No.	AMJ202602
Consignee		Project	LOT 4, 43 KIMRUSKA PLACE THE GAP QLD 4061	From:	AMJ	Trading Terms	DDP(Deliver to job site including 10%gst)
				To:Brisbane		Payment	T/T 50% advance,50% balance before shipment

Aluminium Windows & Doors

Location	WINDOW CODE	Design	Description	Glass	Hardware	Flyscreen	Profile Color	Size(mm)		Area/set	QTY	TOTAL AREA	Unit-Price	Unit-Price	AMOUNT
								W	H	(㎡)	Set	(㎡)	AUD/㎡	AUD/Set	AUD
/	W01	/	GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	600	2400	1.44	1	1.44	194	280	280
GF-PANTRY	W02		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	600	2400	1.44	1	1.44	194	280	280
GF-KITCHEN	W03		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	900	1500	1.35	1	1.35	194	262	262
GF-LIVING	W05		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	900	2400	2.16	1	2.16	194	420	420
GF-LIVING	W06		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	900	2400	2.16	1	2.16	194	420	420
GF-LIVING	W07		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	900	2400	2.16	1	2.16	194	420	420
FF-RUMPUS	W11		AWNING WINDOW	5mm low-e+12Argon+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80T thermal broken series)**	1500	900	1.35	1	1.35	269	364	364
FF-MASTER BEDROOM	W14		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	900	1200	1.08	1	1.08	194	210	210
FF-ENS	W16		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	900	1200	1.08	1	1.08	194	210	210
FF-BEDROOM 2	W18		SLIDING WINDOW	5mm+8A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	2400	900	2.16	1	2.16	219	473	473

FF-BEDROOM 3	W19		SLIDING WINDOW	5mm+8A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	2400	900	2.16	1	2.16	219	473	473
GF-GARAGE	W22		SLIDING WINDOW	5mm+8A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	3600	600	2.16	1	2.16	219	473	473
FF-ENS	W27		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	900	1200	1.08	1	1.08	194	210	210
FF-WIR	W30		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	900	1200	1.08	1	1.08	194	210	210
FF-BEDROOM 2	W34		GLASS LOUVRE	6mm tempered glass	NO	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	600	2400	1.44	1	1.44	194	280	280
FF-BEDROOM 4	W37		SLIDING WINDOW	5mm+8A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	2700	600	2.00	1	2.00	219	438	438
FF-LAUNDRY	W38		SLIDING WINDOW	5mm+8A+5mm double tempered clear glass	AMJ standard hardware	Fiberglass flyscreen	powder coated custom colour **(AMJ80 semi-commercial series)**	2100	600	2.00	1	2.00	219	438	438
/	D01		PIVOT DOOR	5mm+12A+5mm double tempered clear glass	AMJ standard hardware	/	powder coated custom colour **(AMJ100 heavy duty series)**	1200	2340	2.81	1	2.81	304	854	854
GF-DINING	D03		STACKER DOOR(SSF)	5mm low-e+9Argon+5mm double tempered clear glass	AMJ standard hardware	0.5mm Stainless flyscreen	powder coated custom colour (AMJ100L full commercial series)	3000	2400	7.20	1	7.20	223	1607	1607
GF-LAUNDRY	D04		CASEMENT DOOR	5mm low-e+12A+5mm double tempered clear glass	AMJ standard hardware	/	powder coated custom colour **(AMJ100T thermal broken series)**	820	2340	1.92	1	1.92	306	588	588
For the window per sash area is smaller than 1㎡, it's calculated by 1㎡.(For sliding windows,small than 1㎡, it's calculated by 1.5㎡,SQM1.0-1.99,it's calculated by 2㎡) (For Bi-Fold windows,per sash min calculated by 1.6㎡)(For Bi-Fold doors,per sash min calculated by 1.8㎡)															
							Total	28		63.01					AUD 12,863
							Timber reveal material charge								**AUD 1,743**
							Upgraded Steel framed pallet packaging charge								**AUD 542**
							Fiberglass flyscreen for all openable windows								**AUD 344**
							0.5mm Stainless flyscreen for Stacker doors(D04)								**AUD 191**
							EXW Total Value								**AUD 15,683**
4 jobs EXW value: Total 127pcs windows&doors(SQM301.39)															
								118		285.85					AUD 65,244
							EXW Total Value--- 4 jobs together								**AUD 78,793**
Shipping cost from AMJ factory to 4 jobs site															
							Shipping cost from AMJ factory to job site (sea shipping +Customs clearance and delivery to job site)--Will update when close to loading date								**AUD 14,000**
							DDU total value(AMJ factory to jobsite without GST)								**AUD 92,793**
							option 1 payment: DDP total value (AMJ factory to jobsite including 10% GST)								**AUD 102,073**
							option 2 payment: DDP total value(AMJ factory to jobsite not including 10% GST, 5% of total value for custom)								**AUD 97,433**

If window per sash area is smaller than 1 ㎡, then use 1 ㎡ as Pricing Area.

This quote is based on the proposed design and exchange rate of 1 AUD=4.65CNY . (based on the exchange currency on 3th ,April, 2026)
If exchange fluctuation rate is above 2% at the actual payment time, then the payment need to be paid according to value day rate.

REMARKS:

* Profile - Aluminium profile wall thickness: AMJ82series semi-commercial grade system:1.6-2.0mm; all doors: AMJ100/AMJ100L series fully commercial grade system: 1.8-2.0mm
* Standard - AS2047.CE.ISO9001.
* Glazing - Australian standards AS/NZS2208 certificate.
* Hardware -all windows&doors use China Brand hardware
* Silicon sealant - baiyun brand .
* Payment Terms -50% deposit and 50% paid before loading by T/T.
* **Production time - after the deposit is received and shop drawings are approved.EXW/FOB: 5-6 weeks;CIF(Sydney, Mel, Brisbane): 7-8weeks ;CIF(Fremantle/Adelaide): 9-10weeks;DDP/DDU: 10-12weeks(Sydney, Mel, Brisbane) DDP(Fremantle/Adelaide): 12-14weeks;**
* Packing - Safety export package.
* Loading -150㎡ for one 20ft container,300 ㎡ for one 40ft container.
* Period of Validity-15days
* Warranty-5 years
* The warehousing fee(not below 100 USD per day) will be charged if the goods are done well but haven't shipped out over 15days.

* **Replacement: Free replacements for damages in the transit will be provided within 7days after goods arrive at destination port, such as hardware or glass damages during the delivery.**





Attachment H

Balmain&Co.

Eric Lambers <el@balmainandco.com.au>

Commercial Windows

Trend - InfoLeads - VIC <infoleadsvic@trendwindows.com.au> 27 October 2026 at 07:47
To: Eric Lambers <el@balmainandco.com.au>

Good Morning,

Thank you for the email.

Sorry Trend will not be quoting on this project.

All the best

Hi Vic email,

See below quote / more information request.

Thanks,

Eric

Eric Lambers

Pre Construction Manager

[redacted]

[redacted] **Web** | balmainandco.com.au

Head Office | Level 1, 168-174 Dorcas Street, South Melbourne Vic 3205
Queensland Office | 16 Douglas Street, Milton QLD 4064



Balmain & Co proudly acknowledges the traditional custodians of the land where we live, work and learn. We pay our respects to all traditional Aboriginal and Torres Strait Islanders, their culture and their Elders past, present, and emerging.
Please consider the environment before printing this email.

---------- Forwarded message ---------
From: **Eric Lambers**
Date: Mon, 26 Oct 2026 at 16:26
Subject: Commercial Windows
To: <info@trendwindows.com.au>

Afternoon,

I spoke with the sales team today about some commercial windows.

Do you supply projects similar to this project in Bentleigh. Circa 2500 m2.

- GF and L1 are a 250mm centre glazed with a banding perforated frit, and upper levels are insulated spandrels, bricks and insulated mullions.
- All fully jambed commercial suite not resi suite.
- Thermally broken, double low E 6/12/6. Some of it will be lam to eastern elevations as well, 6/12/7.6.
- Bronze to match dulux kinetic bronze

LINK to the archi file:
https://drive.google.com/open?id=1A1bNYvMawUAITMH5cql6Znsgf662LS1t&usp=drive_fs

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Eric Lambers

Pre Construction Manager

Head Office | Level 1, 168-174 Dorcas Street, South Melbourne Vic 3205
Queensland Office | 16 Douglas Street, Milton QLD 4064



Balmain & Co proudly acknowledges the traditional custodians of the land where we live, work and learn. We pay our respects to all traditional Aboriginal and Torres Strait Islanders, their culture and their Elders past, present, and emerging.

Please consider the environment before printing this email.

Balmain&Co.

Eric Lambers <el@balmainandco.com.au>

Stegbar Enquiry

Deanne Davis <430124@ventora.com.au> 26 October 2026 at 15:25
To: "el@balmainandco.com.au" <el@balmainandco.com.au>

Hello Eric,

Thank you for your enquiry. Unfortunately we would not be able to do this, it is production out of scope. We recommend contact a local builder in your area.

Have a great day.

Deanne Davis
Stegbar Customer Service Team.