

26 January 2026

Mr David Latina
Commissioner of the Anti-Dumping Commission
Department of Industry Science and Resources
GPO Box 2013
Canberra ACT 2600
Australia

By email: investigations1@adcommission.gov.au

Dear Commissioner Latina

Re: In support of Anti-Dumping Notice No 2025/115 - Case 691 Aluminium windows and doors from China

I write as the owner of Vitrocsa Australia Pty Ltd (**Vitrocsa Australia**), a fully owned Australian company, in support of Anti-Dumping Notice No 2025/115 - Case 691 Aluminium windows and doors from China.

Vitrocsa Australia has a long heritage of manufacturing aluminium doors and windows in Australia, and a hard-earned and proud reputation as the Australian market leader. However, we are being increasingly undercut on our locally made, world-leading systems by dumped product and unfair prices.

I specifically write to address the many false assertions made in opposition to Case 691, with detailed focus on the claims submitted by Rigby Cooke Lawyers for 'Empire Windows' in the document dated 23 December 2025, EPR Number 397 (**Appendix A**).

The opposition's claims run counter to our 18-year commitment to Australian customers, product excellence and leading design.

Vitrocsa Australia's response below lists facts which directly disprove some of the many the misleading claims put forward in Appendix A. We welcome you, and any members of the Anti-dumping team, to visit our NSW facilities, located at 1 Gillespie Avenue Alexandria, as further proof of the information I present.

1. Facts disproving false claims made in opposition to Anti-Dumping Notice No 2025/115 - Case 691 – Appendix A.

The following claims are completely misleading and demonstrably false.

1.1 *"These industry stakeholders consistently identified that the Australian industry was unable to produce aluminium windows of the required quality, type and quantity required by industry stakeholders."* – Appendix A, point 2.3

FACT: Since 2008, Vitrocsa Australia successfully locally designed, engineered, extruded, finished and fully manufactured its own high-end slimline products in Australia.

FACT: Vitrocsa Australia's locally produced products are recognised by leading and well-respected industry stakeholders globally as the industry leader of high-end, high performing minimal window products.

FACT: Vitrocsa Australia's success and rapid growth is testament to Australia's local capability of producing cutting-edge, premium windows.

- 1.2 *"There is a clear functional gap in the Australian market as domestic manufacturers do not produce slim-profile architectural sliders."* – Appendix A, Point 3.13

FACT: Vitrocsa Australia has been fully manufacturing and supplying its own locally produced slim-profile architectural sliders for this Australian market segment since 2008.

- 1.3 *"Noting these significant differences between our clients imported products and the goods which are the subject of the Application, our client's position is that its products cannot be characterised as 'like goods' to the goods produced by Australian industry."* - Appendix A, Point 3.4

FACT: Vitrocsa invented the first slim-profile sliding system in 1992 and classifies all 'closely resembled' imported products as 'like goods' to those produced in Australia by Vitrocsa Australia.

- 1.4 *"Our clients imported products possess physical characteristics that distinguish them fundamentally from the "standard" products manufactured by the Australian industry."* - Appendix A, Point 3.5

FACT: Vitrocsa's Australia's Australian-manufactured minimal slim-profile products are considered by the architectural and construction industry to be the standard specified product required in any high-end architectural residential and commercial market.

FACT: Vitrocsa's Australia's minimal slim-profile products have been specified and used in more than 3000 projects across Australia over the past 18 years.

- 1.5 *"From a commercial perspective, our client's imported goods and the Australian-made goods do not compete in the same market segment. Our client's Euro Sliders series, characterised by its ultra-slim profile and sophisticated European design, targets the high-end architectural and luxury residential market."* - Appendix A, Point 3.12

FACT: Since 2008, Vitrocsa Australia has earned a well-established position in the Australian market specifically targeting and supplying the high-end architectural and luxury residential market segment.

FACT: Vitrocsa originally invented the world's first minimal, slim-profile architectural slider. Any imported products, such as those 'characterised by its ultra-slim profile and sophisticated European design' are therefore considered a copy and therefore a direct competitor.

- 1.6 *"There is a clear "functional gap" in the Australian market as domestic manufacturers do not make comparable slim-profile architectural sliders."* - Appendix A, Point 3.13

FACT: There is no "functional gap" in the market due to the fact that Vitrocsa Australia has locally designed, manufactured and installed slim-profile architectural sliders in the Australian market since 2008.

FACT: Vitrocsa invented the slim-profile architectural slider.

FACT: All imported copies of slim-profile architectural sliders, most specifically those targeting the high-end architectural and luxury residential market, are considered 'comparable' products.

- 1.7 *"Our client's customers have identified a range of specific architectural and performance requirements that cannot be met by the Australian window and door manufacturing industry within a commercially viable timeframe or at a price point that end users can reasonable afford." - Appendix A, Point 3.16*

FACT: All Vitrocsa Australia products are specifically designed to achieve the highest and most demanding architectural and performance requirements.

FACT: All Vitrocsa Australia products are fully tested and compliant, to the highest Australian Standards, including Australia's only fully tested and compliant flush floor track system.

FACT: Vitrocsa Australia products are specified by many hundreds of Australia's leading architects, façade engineers, builders and developers of high-end architecture. Our unique product design and quality allow for the world's largest sliding glass panels, meeting the highest performance ratings, using double and triple glazed glass.

FACT: Vitrocsa is known as a specialist for its curved sliding systems, with the completion of numerous curved projects including the Sydney Opera House.

- 1.8 *"Our client's customers have confirmed that domestic manufacturers are generally unable to supply these products due to technical capability constraints, limited production capacity, extended lead times, and significantly higher cost structures." - Appendix A, Point 3.18*

FACT: Vitrocsa Australia has no technical ability constraints. In fact, the company is known for being the inventors, the innovators and for pushing the boundaries.

FACT: Vitrocsa Australia is known as the technical specialist for its products, notably our Curved Sliding System, with the completion of numerous curved projects including the Sydney Opera House.

FACT: Vitrocsa Australia offers reduced lead times due to the ability to carry its own local stock and locally manufacture. Locally sourced products are much preferred by builders and developers, in comparison to the risk of shipping imported goods.

- 1.9 *"As a result, Australian-made products are frequently unsuitable for projects requiring high-end architectural specifications, premium finishes, and advanced performance outcomes. In contrast, our client's imported systems are specifically engineered to meet these requirements with consistency, quality assurance, and commercial viability." - Appendix A, Point 3.19*

FACT: Vitrocsa Australia's Australian-made products are considered the industry leader and standard-bearer for projects requiring high-end architectural specifications, premium finishes, and advanced performance outcomes.

FACT: Since 2008, Vitrocsa Australia products are well established as the product of choice for the most cutting-edge projects in Australia and New Zealand and known for pushing the boundaries of design.

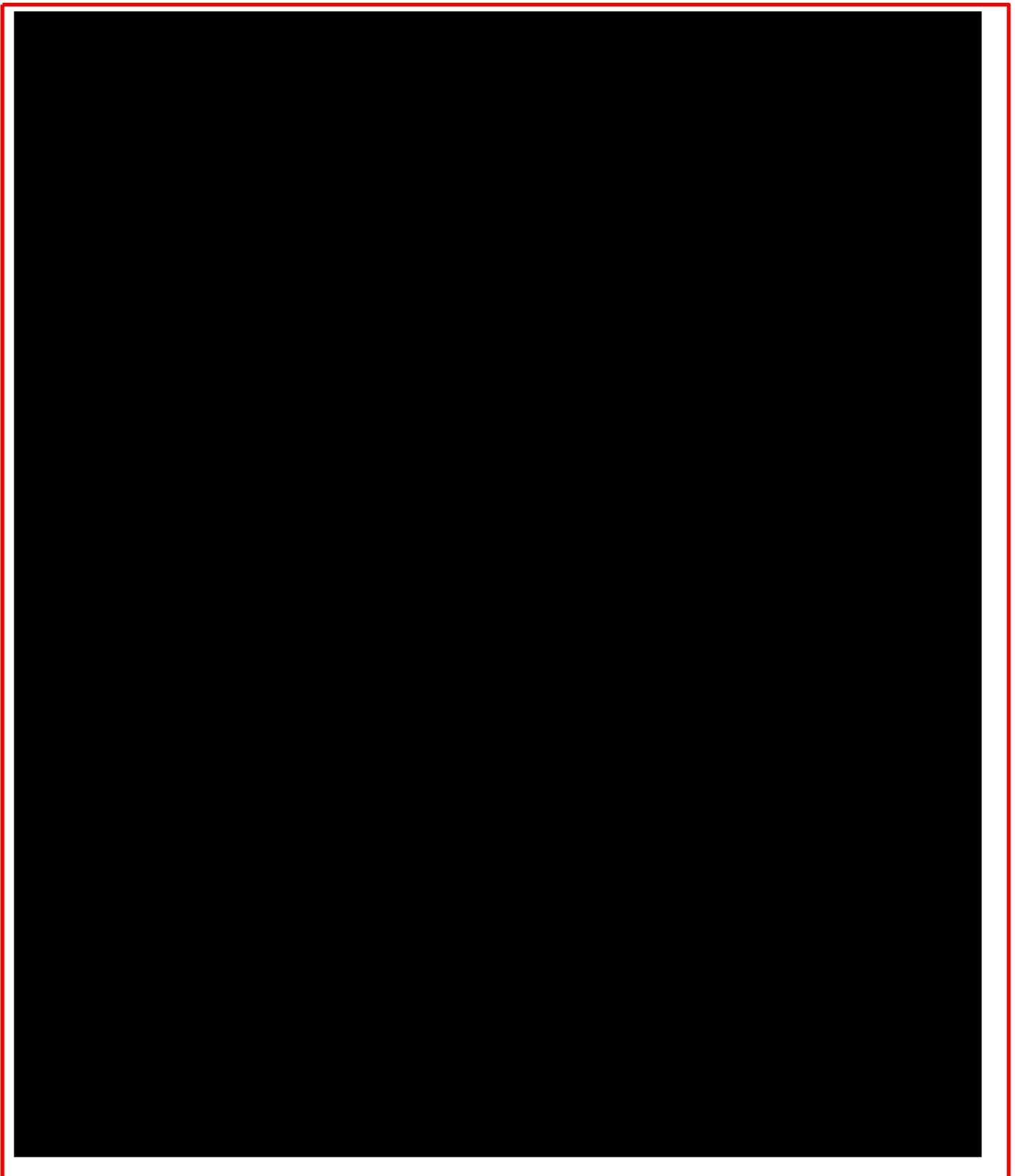
FACT: Vitrocsa products meet the highest Australian Standards, required by the world's most acclaimed architects, and for the most innovative architectural projects.

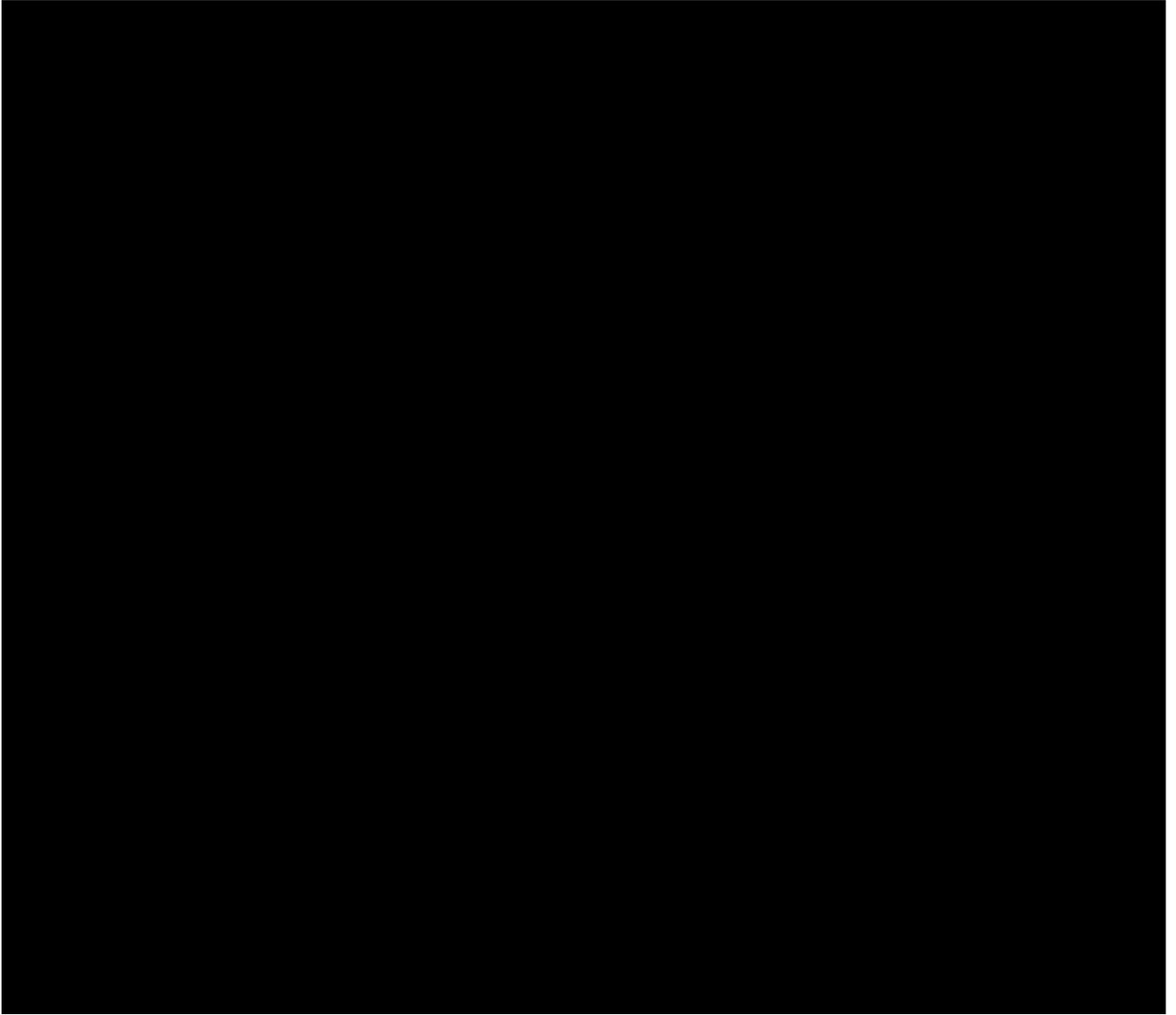
2. Background

- 2.1 Vitrocsa Australia locally manufactures slimline aluminium windows and doors on our premises in NSW, VIC, QLD and WA. Our range can be viewed at **Appendix B** and at our website: www.vitrocsa.com.au
- 2.2 As the world's slimmest and most sophisticated, slim-line minimal window system, Vitrocsa Australia supplies across Australia and proudly exports abroad. Built on cutting-edge design, specification and engineering, our systems deliver functional performance that forms the centrepiece of many clients' forever homes and architecturally led commercial premises.
- 2.3 The first slim-profile aluminium sliding system was originally invented and manufactured by Vitrocsa in Switzerland by Eric Joray, the founder of Vitrocsa, a Swiss watch maker and engineer, in 1992.
- 2.4 Vitrocsa holds the patented title as the inventor of the world's first minimal, slim-profile architectural slider.
- 2.5 Since 2008, the slim-profile aluminium sliding system has been proudly made in Australia by Vitrocsa Australia, one of only two manufacturers in the world to be awarded the licence to produce outside of Switzerland to the Swiss standard.
- 2.6 Vitrocsa Australia has further refined the original Swiss design, establishing the global benchmark for minimalist, slimline aluminium windows and doors.
- 2.7 Since introducing the modern minimalist window to Australasia 18 years ago, our team has collaborated with leading architects and engineers on the most demanding architectural briefs, to adapt and refine the Vitrocsa system for Australia's climate, codes and performance expectations. That long arc of refinement—anchored in innovation, local manufacture and uncompromising client service—is the lived reality of our practice and our market.
- 2.8 Vitrocsa Australia is extremely well-known in the architectural and construction industries, having worked with more than 500 Australian architects and leading builders across an 18-year history. More than 3000 projects have been completed across Australia.
- 2.9 Over the past 18 years, the vast media coverage of numerous cutting-edge projects across Australia and New Zealand is undisputed proof that Vitrocsa Australia leads and well-serves the best architecture in the industry. Our media coverage and films have received many millions of views.
- 2.9 Alongside our own Australia-wide manufacturing facilities, we proudly support the Australian aluminium extrusion industry, Australian anodising and finishing industry and Australian glass industry, amongst others.
- 2.10 Vitrocsa Australia is based across Australia with offices in Sydney, Melbourne, Perth and Noosa to easily accommodate the market demand. Our locally produced products are well recognised by

builders as 'a low-risk item' due to local stock supply, quality control and local production which guarantees shorter lead times.

In Commercial Confidence



In Commercial Confidence

I strongly urge the Commission to act decisively and impose duties without delay—measures essential to halt material injury and restore the principles of genuine free trade.

We would welcome any opportunity to showcase our local fabrication, design and product range so that you can personally gain a first-hand understanding of world-leading products and supply found right here in Australia. Please do not hesitate to contact me at any time.

Yours sincerely

Michael Canturi

Michael Canturi
Director – Vitrocsa Australia