

11<sup>th</sup> February 2025

Mr David Latina  
 Anti-Dumping Commissioner  
 Anti-Dumping Commission  
 GPO Box 2013  
 Canberra ACT 2600

**\*Public File**  
**Investigation No. 691 – Aluminium Windows and Doors exported from China**

Concept Aluminium Systems strongly supports the Anti-Dumping Commission's Investigation No. 691 concerning Aluminium Windows and Doors exported from China and welcomes any measures necessary to ensure fair competition and the protection of Australian Aluminium Window and Door standards.

Concept Aluminium Systems has been designing and manufacturing aluminium windows and doors for over 37 years, and we are deeply concerned about the increasing competition from subsidised and dumped Chinese products in Australia.

Concept Aluminium Systems independent tester has designed systems and worked closely with aluminium window and door manufacturers - both large and small for over a 20-years, with a detailed understanding of production costs. Based on their knowledge, we are confident that certain imported products are being sold into the Australian market at prices below what would be considered sustainable manufacturing cost. It is our view that this pricing behaviour is materially damaging to Australian manufacturers and places the long-term viability of our local industry at risk. If corrective action is not taken, we believe the consequences for Australian manufacturing, compliance standards, and industry employment will be severe.

Attached is an example of a quote our independent tester recently saw. The customer price of \$803.87 for a 1200 High 2400 wide Sliding Window, Double glazed glass, Low E, thermally broken system with screens and reveals are all well below cost. An Australian made product locally manufactured sell price for this window would range from \$1409 for a very competitive system (volume builder) to \$1800 for a more expensive system, making this quote 47% cheaper than our sell price.

W02	105Series Aluminum thermal break sliding window		1. 1.8mm Thickness powder coating 6063-T5 Aluminum thermal break profile 2. Frame depth 105mm 3. Visible : 4. Hardware : HUOMAN 5. Flyscreen :0.7-11 304 Stainless Steel net 6. With timber reveal	5mmClrLOW+20Ar+5mm Clr Double tempered glass	2380	1230	2.93	1	2.93	AUD 803.87	AUD 803.87
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## Reasons for supporting Investigation No. 691

1. Pricing
  - a. We all purchase aluminium at a commodity price based on LME plus a processing cost. The LME portion of the aluminium price is around 90%, while the processing portion may vary by approximately \$0.50–\$0.80 per kilogram.
  - b. The quoted system is 105mm wide, whereas most Australian sliding window systems are between 75mm and 90mm wide. Based on width alone, we should be approximately 24% cheaper in metal cost; however, their price is still lower.
  - c. The wall thickness is 1.8mm, whereas we would typically use 1.4–1.6mm for a similar system. We should therefore be approximately 17% cheaper in metal cost, yet their price remains lower.
  - d. Overall, if the aluminium price per kilogram were the same, there is approximately 30% more aluminium in this window than in a typical Australian system. It should therefore cost more, yet it is still being sold at a lower price.
2. Windows from China almost always come with toughened glass. In Australia, depending on the application, we would often quote float glass (Low-E glass would typically be toughened). The cost of toughening is approximately \$20 per square metre. In this case, the Chinese product should be approximately \$57.60 more expensive due to toughening, yet it is still priced lower.
3. Much of the glass used in Australia is sourced from China. As a result, glass has effectively become a commodity product, and pricing between the two countries should be relatively similar. Most manufacturers purchase glass at highly competitive rates, so there is minimal cost advantage in this area.
4. It is important to note that labour in Australia typically represents only 10–20% of the final product cost, depending on the system. Therefore, the advantage gained from lower labour rates has a limited impact on the final selling price.
5. Transport and packaging costs must also be considered. Custom-made metal or timber stillages are required to pack windows for international transport, which adds significant cost. Locally manufactured products are transported using reusable A-frames, meaning specialised packaging is not required. Despite these additional costs, the imported product is still cheaper.
6. Environmental and occupational health and safety (OH&S) costs are incorporated into Australian-manufactured products, as they should be.
7. Our powder coating processes are strictly environmentally controlled, which adds cost. While powder coating in China may be approximately 20% cheaper, environmental controls are significantly less stringent.

8. Most large Australian manufacturers purchase hardware at competitive prices (often sourced from China). While hardware may still be marginally cheaper in China, the difference is not substantial.

### **Recommendations**

1. We believe that a duty of 45% on imported windows into Australia would not be unreasonable.
2. We believe that all window products sold in Australia should be required to provide a copy of a NATA-certified test report confirming compliance with AS 2047.

### **Conclusions**

Concept Aluminium Systems commends the Anti-Dumping Commission for its efforts to pursuing this investigation and will continue to offer full support to ensure the Australian Manufacturing of Aluminium Windows and Doors operates on a level playing ground.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'John Makris'.

John Makris,

CFO