

15 June 2026

Director  
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Anti-Dumping Commission  
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Dear Director,

## Public File

### Investigation No. 691 – Aluminium windows & doors from China

#### I. Introduction

Capral Limited (**Capral**) makes this submission in response to the two public record submissions lodged by EcoEco Windows & Doors Pty Ltd<sup>1</sup> (**the EcoEco submissions**).

The EcoEco submissions argue that the alleged injury experienced by the Australian aluminium windows and doors (**AWD**) industry is not caused by dumped or subsidised imports from China, but by upstream margin stacking and closed supply-chain structures operated by domestic extruders and system suppliers, including Capral.

Capral submits that this alternative causation argument is unsupported by the factual record, is commercially implausible, and is inconsistent with a substantial body of Anti-Dumping Commission (**the Commission**) precedent across recent continuation inquiries into aluminium extrusions, and should hence be afforded no weight.

#### II. EcoEco's argument

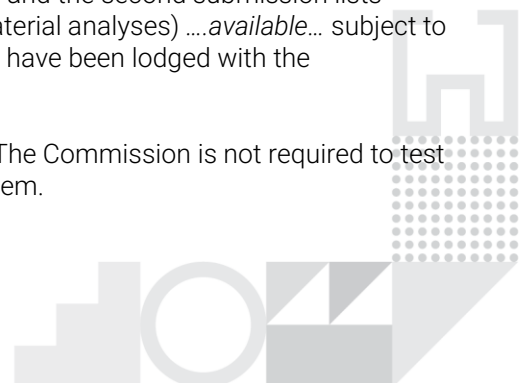
EcoEco claim that the Australian aluminium extrusion industry engages in margin stacking on benchmark-linked commodity inputs to the point where the input cost paid by downstream AWD fabricators is so inflated that said fabricators experience cost-induced injury that is wrongly attributed to imported Chinese AWDs.

EcoEco asserts that complete finished windows can be imported from China at approximately the same price as Australian aluminium component supply alone, and requests the Commission infer from this that domestic supply-chain margins are the real cause of the claimed injury.

Both EcoEco submissions acknowledge that no supporting evidence has been provided to advance their arguments. The first submission offers to provide *...indicative pricing evidence...* on request, and the second submission lists categories of documentation (invoices, landed cost calculations, and bill-of-material analyses) *...available...* subject to confidentiality. As at the date of this submission, no such evidence appears to have been lodged with the Commission.

Capral submits that an assertion without evidence is not a causation finding. The Commission is not required to test alternative hypotheses that have not been evidenced by the party advancing them.

<sup>1</sup> EPR folio no. 422 (dated 11 February 2026) and EPR folio no. 437 (dated 17 May 2026).



### III. Commission findings refute margin stacking

The most direct and obvious rebuttal to EcoEco's position is evident in the Commission's trade remedy findings across a series of recent continuation inquiries involving the Australian extruded aluminium industry:

- In October 2025, the Commission found that the anti-dumping measures against Chinese aluminium extrusions should continue on the basis that:
  - in their absence, dumping, subsidisation, and material injury would continue or recur;
  - price undercutting was observed within a range of 5 percent to 40 percent, highlighting the price sensitive nature of the goods. This undercutting would be heightened in the absence of measures leading to price depression and/or suppression;
  - subject Chinese exporters had extended their market penetration and market share. The absence of continued measures would result in further market share erosion to the domestic industry;
  - Chinese exporters had maintained significant excess capacity, enough to supply the entire Australian market, and had retained and expanded distribution links;
  - subject Chinese imports accounted for approximately 20 percent of total Australian market sales;
  - anti-dumping actions by other jurisdictions (e.g., the U.S., EU, and Canada) made Australia an attractive market for Chinese exporters; and
  - without trade measures, price competition would intensify, resulting in price suppression and loss of market share for domestic producers.
- In May 2026, the Commission found that the expiration of the anti-dumping measures against mill finish aluminium extrusions exported from Malaysia would likely lead to a continuation or recurrence of dumping and material injury.<sup>2</sup> This finding was premised on several factors:
  - subject exporters had maintained distribution links to Australia;
  - subject exporters possessed significant excess production capacity;
  - subject exporters were likely to divert exports to Australia in response to increased U.S. tariffs on aluminium products; and
  - subject exporters had already begun redirecting volumes from Canada to Australia (given newly imposed trade barriers) following the inquiry period.
- Parallel findings were made at the same time in relation to surface coated aluminium extrusions from Malaysia.
- In May 2026, the Anti-Dumping Review Panel (**ADRP**) required the reinstatement of anti-dumping measures against Malaysia and Vietnam in relation to continuation no. 591, following earlier merits review and Federal Court challenges.

EcoEco claims that the industry is margin stacking by 3 times to 5 times above benchmark aluminium cost.<sup>3</sup> Such a situation would not necessitate the Commission make the above-noted determinations. The Commission's findings are based on verified financial information provided under the *Customs Act 1901* and subjected to industry and exporter verification. EcoEco's assertions are not.

### IV. Trade diversion and global overcapacity

The EcoEco submissions take no account of the global trade environment that the Commission has recognised as creating unprecedented and structural competitive pressure on the Australian aluminium extrusion industry. By way of example, Capral notes the following:

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<sup>2</sup> See REP 682.

<sup>3</sup> EPR folio no. 422, p. 5.



- The Commission documented in REP 682 that U.S. tariffs on aluminium products escalated from 10 percent in 2018 to 25 percent in March 2025 and to 50 percent from June 2025. The Commission observed direct evidence that aluminium extrusions exporters had already diverted volumes from the U.S. to the Australian market in response to the tariffs.

REP 682 also found that the reduction in U.S. imports from Canada has generated excess supply in the Canadian domestic market, compressing demand for exports to Canada and generating further export diversion pressure toward open markets including Australia.

- On 28 May 2026, the New Zealand Ministry of Business, Innovation and Employment formally initiated a safeguard investigation into imports of aluminium extrusions, following an application by the Aluminium Extruders' Association of New Zealand (ALENZ).<sup>4</sup>

The investigation has arisen in the context of the same global structural overcapacity, U.S. section 232 tariffs, and redirected trade flows that the Commission has identified. The fact that New Zealand, as an open economy sharing the same trade exposure characteristics as Australia, has initiated a formal safeguard inquiry confirms the global nature of import pressures now facing domestic aluminium extrusion producers. Margin stacking by domestic suppliers does not explain why an importer association in New Zealand is seeking trade relief from the same product at the same time.

Such developments point to a structural shift in global aluminium trade patterns driven by the application of tariffs and trade remedies in major consuming markets. Excess supply that cannot access markets such as the U.S., Canada, or the EU are redirected to open markets. This has been documented by the Commission comprehensively. It is this trading environment in which domestic producers are most vulnerable to injury, and least able to absorb competitive pressure by reducing margins.

## V. Alternatives to domestic raw materials

EcoEco's characterisation of system-supplier participation as "upstream margin layering" fundamentally misunderstands the commercial function and regulatory role of the Australian AWD systems model.

In the Australian market, companies such as Capral design, engineer, test and support complete AWD systems, including profiles, gaskets, hardware integration, fabrication manuals, technical documentation, engineering data, compliance evidence, testing certification, project support, tooling and equipment development and supply, and fabricator training. Significant investment is required to support compliance with AS2047, NCC requirements, structural and weather performance testing, acoustic and energy performance verification, WERS certification, warranty obligations, and ongoing system maintenance and improvement.

The intellectual property, compliance framework and technical support developed by system suppliers is then made available to independent Australian fabricators, enabling those businesses to manufacture compliant windows and doors without each individually bearing the substantial fixed costs, specialist staffing, technical risk and time associated with developing and certifying proprietary systems themselves.

This model lowers barriers to entry and is a key reason Australia maintains a broad and diverse local fabrication industry comprising many small and medium-sized independent businesses. Rather than reducing competition, the systems model increases competition by allowing independent fabricators to participate in the market, compete for projects and manufacture compliant products without needing to vertically integrate system design, engineering and testing capabilities internally. Absent this model, the Australian AWD market would likely consolidate toward a much smaller number of large vertically integrated operators with the scale and capital required to independently develop, certify and maintain compliant systems.

<sup>4</sup> Refer, inter alia, <https://discoveryalert.com.au/aluminium-extrusion-safeguard-new-zealand-imports-2026/>



This is a well-established international model for architectural aluminium, as demonstrated by global suppliers such as Schüco and Reynaers, which develop proprietary window, door and façade systems and support independent fabricator networks across multiple jurisdictions.

EcoEco's comparison between imported Chinese finished windows and the Australian supply chain also fails to recognise the structural differences between the two manufacturing models. Many Chinese suppliers operate highly vertically integrated manufacturing businesses where system design, extrusion procurement, fabrication and export are managed within large-scale enterprises benefiting from significantly different labour costs, energy costs, regulatory obligations and production scale.

By contrast, the Australian AWD industry operates through a distributed manufacturing model in which upstream system development and compliance investment supports a competitive downstream network of independent fabricators. The existence of upstream system suppliers is therefore not evidence of anti-competitive conduct or market distortion. It is the mechanism through which local manufacturing capability, compliance assurance, competition and customer choice are sustained within the Australian market.

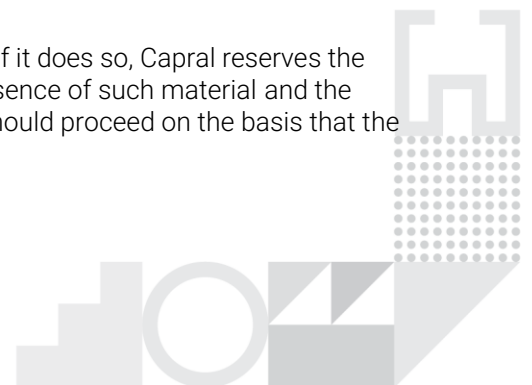
Finally, AWD fabricators are not without alternative sourcing options for aluminium feedstock. Fabricators have the ability to source profiles directly from import markets, meaning Capral and other domestic extruders already operate under direct competitive pricing discipline from the same overseas suppliers whose finished AWD exports are under investigation in this proceeding. Critically, even if aluminium feedstock were supplied by Capral to local fabricators at no cost, the resulting fabricated window price would still not approach the landed cost of imported Chinese finished windows. This commercial reality directly contradicts EcoEco's premise that aluminium input pricing is the determinative variable in the observed price differential.

#### VI. EcoEco submissions lack substance

The Commission should approach EcoEco's alternative causation argument with caution. Capral notes the following evidentiary deficiencies:

- EcoEco asserts that complete finished windows can be imported at approximately the same price as Australian aluminium component supply. No invoice, landed cost calculation, quote, bill of materials, or any other primary commercial document evidencing this claim has been submitted to the public record.
- The 3 times / 5 times multiplier scenario in the EPR 422 submission is presented as a worked example, not as evidence that any domestic supplier has actually charged AWD fabricators at such levels. The Commission should not treat an illustrative calculation as evidence.
- The Pilkington/Guardian example described in the EPR 422 submission involves a different product, different parties, and different events occurring over two decades ago. It does not establish any fact relevant to the AWD inquiry.
- EcoEco's observation that downstream support submissions were mobilised following initiation of the investigation is unremarkable. Industry participants routinely provide submissions after initiation. The weight to be given to downstream submissions is a matter for the Commission. EcoEco has provided no evidence that the submissions were inaccurate or fabricated.

EcoEco has signalled willingness to provide confidential supporting material. If it does so, Capral reserves the right to seek access to any non-confidential version and to respond. In the absence of such material and the weight of affirmative injury evidence already on the record, the Commission should proceed on the basis that the EcoEco alternative causation argument is factually incorrect.



VII. Conclusion

The EcoEco submissions petition a commercially implausible alternative causation argument without evidentiary support. The argument is directly contradicted by the Commission's verified findings in recent aluminium extrusion continuation inquiries, and the ADRP reconsideration of CON 591, all of which confirm that the Australian aluminium extrusion industry continues to suffer material injury from dumped and subsidised imports. The initiation of a parallel safeguard investigation in New Zealand confirms that the competitive pressure on open-market domestic extruders is structural and global, not a product of domestic pricing architecture.

Capral respectfully submits that the Commission should therefore:

- proceed to assess injury and causation in INV 691 on the basis of verified evidence on the investigation record;
- decline to treat the EcoEco alternative causation argument as an evidenced non-attribution factor under the legislation in the absence of supporting commercial documentation; and
- where EcoEco provides confidential commercial evidence, assess that evidence in the ordinary way and afford the Australian aluminium extrusion industry the opportunity to respond.

Yours sincerely

