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20 August 2026

Director
Investigations 1
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601

Email: investigations1@adcommission.gov.au

Dear Director,

Public File

Investigation No. 691 – Aluminium windows & doors from China

I. Introduction

Capral Limited (**Capral**) makes this submission in response to the submission by EcoEco Windows & Doors Pty Ltd (**EcoEco**) dated 29 July 2026,[1] which was in reply to Capral's earlier submission dated 15 June 2026.[2]

Capral submits that EcoEco's new submission provides no evidence that the exported aluminium window and door (**AWD**) goods are sold at or above normal value (in other words, that the goods are not dumped), that the Australian industry's verified costs are unreasonable, or that any identified factor other than the dumped imports has caused the detrimental in-market price effects.

EcoEco concedes that dumping may occur, that the domestic industry's system value is genuine, and that supporting fabricators have suffered lost work and margin compression. Having conceded such, EcoEco seeks to defer the causation finding by asking the Commission to test an open-ended list of hypothetical alternative causes that EcoEco itself declines to quantify.

Capral's position on EcoEco's representations is therefore:

- that the evidence that governs dumping and injury in this inquiry (export price, normal value and the cost to make and sell of the subject goods) is held by the exporters and the AWD producers, and is verified by the Commission, not by Capral.
- that EcoEco's own "zero-cost aluminium" reasoning, followed to its conclusion, points directly to the dumped import price as the cause of price suppression; and
- that EcoEco does not identify, or quantify, injury non-attribution (in other words, no non-dumping causes).

II. Verifiable evidence is at the AWD industry level

EcoEco requests that the Commission seek that Capral produce a worked, verifiable, window-level calculation to support the proposition that a locally fabricated AWD cannot approach the landed price of a Chinese equivalent.[3] That request misconceives the inquiry.

[1] EcoEco submission, EPR folio no. 448.
[2] EPR folio no. 439.
[3] EcoEco submission, section 6 at request 6.3.

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CAPRAL ALUMINIUM

SHAPING THE FUTURE

Capral is an Australian extruder and system provider. It does not fabricate finished AWD's and does not hold the transaction-level cost to make and sell of said goods. That cost is held by Australian producers of like goods and is obtained and verified by the Commission in the ordinary course of its enquiries. Whether Australian producers can recover their reasonable costs plus a reasonable profit, and the extent to which the prices of dumped imports have prevented them from doing so, is a question for the Commission on that verified evidence. It is not answered by, and does not depend upon, a calculation from Capral.

Capral's observation that removing the aluminium input would not enable a local fabricator to reach the landed import price is an illustration drawn from Capral's knowledge of the market. It was not advanced as a statutory costing of a particular window, and EcoEco is incorrect to treat it as one. The point the illustration makes is set out at section III below, and one that the Commission's verification of AWD industry member costs will confirm or otherwise.

III. <u>Zero cost aluminium reasoning</u>

EcoEco accepts Capral's representation that even if aluminium were supplied to a local AWD fabricator at no cost, the fabricated window could not approach the landed price of the Chinese finished window.[4] EcoEco states this shows only that other cost factors remain, which must then be examined for non-dumping causes.

Capral submits that if a cost gap to the import is evident, then the difference is the price effect of the imports. It is the difference between a reasonable Australian cost base and the price at which the imported goods are offered. Where the imports are dumped, it is the price effect of the dumping.

EcoEco's position is to relabel that residual difference as a "non-aluminium cost factor" and move it into the non-attribution basket. However, the residual is not a cost on the Australian side of the ledger that EcoEco can point to – it is the import price on the other side. The larger the residual cost/price gap, the more specifically EcoEco identify that the dumped import price is what actually suppresses domestic AWD prices. On EcoEco's own reasoning then, this is direct attribution to the subject Chinese AWD imports.

IV. <u>Irrelevancy of importer efficiency</u>

EcoEco extols that its low prices are the result of a superior supply-chain model. It sources extrusions, glass and hardware from offshore, has them assembled into finished windows overseas, and imports the finished product, adding Australian service and warranty.[5]

On that description then, EcoEco is an importer of AWD goods under consideration, and has the price advantage of buying a dumped and subsidised offshore-assembled finished AWD. That is not an alternative explanation that displaces that imports cause injury to a domestic industry. Instead, the import channel EcoEco and others sit within is the mechanism by which imports enter and undercut the market.

Dumping is determined by comparing the exporter's export price with the normal value in the country of export. An importer's efficient sourcing does not contribute to an assessment of this phenomena, and says nothing about whether the export price sits below normal value. EcoEco's submission does not offer an assessment on export prices or normal values. This is the only relevant comparison that determines the dumping margin. An importer efficiency narrative, even if accepted to assist in, for example, understanding the Australian market place for AWD goods generally,, leaves the dumping question unaddressed.

V. <u>Non-causation</u>

EcoEco submits that the Commission *…should test…* a list of items on the matter of injury causation: component

[4] Ibid, section 6.2-6.3.
[5] Ibid, sections 3 and 4.1.

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pricing, switching costs, related-party margins, productivity, overhead, scale and segmentation. EcoEco states it holds invoices, bills of materials, and landed-cost and freight calculations, however its submission does not disclose an Australian cost or margin that is unreasonable, nor does it quantify the effect of any factor it names.

The *Ministerial Direction on Material Injury* (**the Injury Direction**) requires that injury caused by identified factors other than dumping not be attributed to dumping.[6] It does not, however, specifically require the Commission to disprove an open-ended list of hypothetical causes that the party raising them decides to proffer but declines to substantiate. A/any factor becomes relevant to non-attribution when there is evidence of it and of its effect. EcoEco supplies neither in its representations.

VI. Sourcing contradiction

EcoEco argues that alternative profile sourcing is not commercially practical and that fabricators are captive to proprietary systems,[7] while in the same submission describing how it freely assembled its own supply chain from independent offshore specialists in extrusions, glass and hardware.[8] (section 4.1). EcoEco is hence proof that alternative sourcing is viable and that EcoEco's captive sourcing argument is null and void.

VII. Departure from the Injury Direction

EcoEco criticises a counterfactual injury assessment that keeps the Australian supply chain constant and removes the dumped imports, and proposes instead that the Commission re-price the entire Australian supply chain.[9] This is fundamentally non-sensical and puts the injury assessment about-face.

The counterfactual required by the injury and causation analysis is the state of the market absent the dumped or subsidised imports, holding the industry's prevailing cost structures. EcoEco's alternative asks the Commission to treat the domestic industry's legitimate costs and margins as themselves the problem, and in effect to assume that the industry ought to have adopted EcoEco's offshore-assembly model or something similar. Neither the statute nor the Injury Direction requires an applicant to restructure into a competitor's business model to qualify for relief against dumping and/or subsidisation.

VIII. Conclusion

EcoEco concedes the economic elements of the case and the industry, but quantifies no alternative cause of it. Its zero-cost aluminium reasoning, followed to its logical end, assigns the price effect to the dumped imports. Its efficiency case establishes only that it is an efficient importer of the subject goods. Its requests in relation to Capral seek evidence that, by the design of the inquiry, is held and verified elsewhere.

Capral therefore respectfully requests that the Commission disregard these recent and all previous EcoEco representations in totality.

Yours sincerely

[redacted]

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[6] Ministerial Direction on Material Injury 2012; see also Anti-Dumping Commission, Dumping and Subsidy Manual (injury and causation).
[7] EcoEco submission, EPR folio no. 448, section 8.
[8] Ibid, section 4.1.
[9] Ibid, section 10.2.