PERFECT
WINDOWS & DOORS

23/10/2026

Australian Trade Remedies Commission
Investigations 1
GPO Box 1632
Melbourne VIC 3001

Re: Investigation No. 691 – Aluminium Windows and Doors from China

Dear Director,

Support for Statement of Essential Facts No. 691

I am writing on behalf of Perfect Windows & Doors, a uPVC window and door manufacturer based in Ballarat, Victoria, and part of the J G King Building Group. We have manufactured windows and doors in Ballarat since 2005 and employ around 50 people. The group also includes J G King Homes, a volume residential builder, and Steel Frame Solutions, a steel frame manufacturer.

While we do not manufacture the aluminium windows and doors that are the subject of Investigation 691, we are part of the broader Australian window and door manufacturing industry. We support the findings in Statement of Essential Facts No. 691 and the efforts of the Australian Glass and Window Association (AGWA) and the Australian industry applicants to achieve a fair and level playing field.

We support the Commissioner's preliminary findings that aluminium windows and doors exported from China were dumped and subsidised, that the Australian industry suffered material injury caused by those dumped and subsidised imports, and that dumping and subsidisation may continue. We also support the decision to take securities under the Preliminary Affirmative Determination from 15 October 2026.

Why dumped aluminium imports affect a uPVC manufacturer

In the residential market in which we operate, builders and homeowners compare window quotations across framing materials. The price of imported aluminium windows from China has become a reference point in those comparisons. Where that reference point reflects dumped and subsidised prices rather than normal values, it suppresses the prices available to every Australian manufacturer, whatever the framing material, and reduces the margin available to reinvest in people, plant and product development.

Because our group also builds homes, we understand how builders buy windows. Window supply is typically priced and awarded at the quoting stage, often on the lowest compliant price. An artificially low price resets what the market expects to pay, and that expectation does not stay confined to aluminium products.

Confidence to invest

In 2024 we opened a new manufacturing facility in Ballarat with an automated European production line for profile cutting and welding. That investment was made in the expectation that Australian manufacturers would be able to compete on fair terms. Decisions on further investment in Australian window

manufacturing, by us and by others in our industry, depend on that expectation holding. The Commission's findings, and effective final measures, are important to that confidence.

A shared supply chain

Although different window materials compete in parts of the market, Australian manufacturers depend on a significant shared supply chain. Our glass is supplied by an Australian glass manufacturer and processor that also supplies Australian aluminium window manufacturers, and the volume they sustain supports the range, capacity and lead times available to us. The same applies to testing laboratories, machinery service, technical expertise and the skilled glaziers, fabricators and installers our industry trains and shares. The continued loss of Australian aluminium window manufacturing capacity would weaken that base for all of us.

Substitution risk

The measures under consideration apply only to aluminium windows and doors. Finished uPVC windows and doors are outside the scope of this investigation and are not currently subject to anti-dumping measures in Australia. We are concerned that, once final measures apply, some import volume will move to uPVC and other non-aluminium framing materials from China, and to other countries of origin. We do not ask the Commission to extend the scope of Investigation 691. We do ask the Commission to note this risk and to remain alert to any circumvention of the measures, including assembly in third countries and slight modification of the goods, so that the measures remain effective.

For these reasons, we support effective final measures that address the injury identified by the Commission and give Australian aluminium window and door manufacturers the opportunity to compete on fair terms. Our support also reflects a broader interest in a diverse, innovative and competitive Australian window and door manufacturing industry, with capability across aluminium, timber, uPVC, steel and other window systems, supported by a strong domestic supply chain.

We support AGWA continuing to represent Australian industry through the remainder of Investigation 691 and encourage the Commission to ensure that the final measures provide a meaningful and durable level playing field.

Yours sincerely,



John King
Executive Director
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Perfect Windows & Doors – uPVC window and door manufacturer
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