

Investigation No. 691

Aluminium Windows and Doors Exported from the People's Republic of China

Combined non-confidential submission from DENA WINDOWS in response to the Statement of Essential Facts (SEF 691)

Submitted by	DENA WINDOWS
Role	Australian importer and supplier of aluminium windows and doors
Contact	Jeff, Director
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Date	19 October 2026

Dear Director - Investigations 1,

I am writing on behalf of DENA WINDOWS, an Australian business involved in the supply and importation of aluminium windows and doors for residential construction projects.

This document is intended as a non-confidential submission in response to the Statement of Essential Facts for Investigation No. 691 - Aluminium Windows and Doors exported from the People's Republic of China. It incorporates DENA WINDOWS' further comments on causation and broader market effects and is suitable for publication on EPR 691.

I would like to raise several concerns regarding the broad application of the proposed anti-dumping and countervailing measures, particularly their impact on Australian importers, builders, homeowners and projects requiring specialised or high-performance window and door systems.

Product diversity and competition in the Australian market

Based on my experience in the Australian window and construction industry, one important issue is the difference in the range and diversity of products available from overseas manufacturers compared with the range available from individual Australian manufacturers.

The Chinese manufacturing market is significantly larger and supports a very broad range of aluminium window and door systems, profiles, hardware, opening mechanisms and glazing configurations.

The Australian market is smaller, and it is understandable that not every local manufacturer can economically develop, manufacture or stock every specialised system.

This does not mean that these products are completely unavailable in Australia. However, for certain categories, the number of local suppliers capable of providing genuinely comparable products can be relatively limited.

Examples of specialised product categories

- thermally broken aluminium window and door systems;
- slim-frame architectural sliding doors;
- advanced large-format sliding-door systems;
- tilt-and-turn windows;
- specialised hardware and opening mechanisms;

- oversized glazing systems; and
- certain high-performance or architecturally specialised profile systems.

These products are not necessarily available across the broader Australian manufacturing market in the same range of configurations, dimensions, performance levels and price points.

Thermally broken systems

Thermally broken aluminium systems are a good example.

As energy-efficiency requirements continue to increase, demand for higher-performance aluminium windows and doors is also increasing.

However, not every Australian window fabricator currently manufactures or offers a broad range of thermally broken systems.

Where only a limited number of manufacturers can provide such products, restricting imported alternatives may significantly reduce competition within that segment of the market.

This may result in builders and consumers having fewer choices and may also give a relatively small number of suppliers greater pricing power.

The same consideration applies to other specialised products such as tilt-and-turn windows and high-performance sliding systems.

Slim-frame and advanced sliding-door systems

Another example is modern slim-frame sliding-door systems.

These systems can involve very narrow sightlines, specialised tracks, concealed rollers or hardware, improved sealing arrangements and the ability to support large glass panels.

They are often selected for architectural reasons as well as performance and functionality.

While some similar systems may be available within Australia, they are not necessarily offered by a broad range of manufacturers.

Reducing access to imported alternatives may therefore reduce competitive pressure in this part of the market rather than simply transferring demand to an equivalent Australian supplier.

Tilt-and-turn windows and specialised opening systems

Tilt-and-turn windows provide another example of a specialised system.

They combine different opening functions, specialised hardware and sealing arrangements and are commonly associated with higher-performance window systems.

These products may be available from some Australian suppliers, but they are not necessarily part of the standard product range of many domestic aluminium window manufacturers.

Where only a limited number of suppliers offer a particular system, strong restrictions on imported competition can result in a more concentrated market.

Large-format windows, sliding doors and glazing

Modern residential architecture increasingly uses large glass panels, wide openings and oversized sliding or fixed glazing systems.

Providing these products can require specialised profiles, hardware, engineering and glass-processing capability.

Again, some Australian manufacturers can provide these products, but the number of suppliers may be relatively limited depending on the dimensions, performance requirements and design.

Imported products therefore provide an important additional source of competition and product choice.

Without that competition, builders and consumers requiring these specialised systems may face significantly higher prices or a very limited choice of suppliers.

Price should not be assumed to be the only reason for importing

It is important that imported products are not assumed to be selected only because they are cheaper.

In my experience, customers frequently select imported systems because of a combination of thermal performance, profile design, slim sightlines, large-panel capability, opening functionality, hardware quality, specialised engineering, glazing options and architectural appearance.

Therefore, it should not automatically be assumed that an order for an imported specialised system would otherwise have been placed with an Australian manufacturer.

In some cases, a close equivalent may only be available from a small number of local suppliers. In other cases, the desired combination of design, performance and price may not be readily available at all.

Competition and pricing

I respectfully submit that this issue is particularly important when considering the broader economic impact of anti-dumping measures.

Where a specialised market is already serviced by only a limited number of domestic suppliers, significantly restricting imported alternatives may unintentionally reduce competitive pressure.

A healthy market should allow manufacturers to compete on quality, innovation, performance, service and price.

If imported alternatives are effectively removed from a specialised market by very high duties or security requirements, the remaining suppliers may face substantially less competitive pressure.

This can potentially lead to higher prices for builders and consumers, particularly in product categories where the number of capable suppliers is already limited.

The objective of supporting Australian manufacturing should therefore be balanced against the need to maintain effective competition and reasonable consumer choice.

Impact of very high security rates

I am particularly concerned about the very significant security rate applicable to 'uncooperative and all other exporters'.

For a small or medium-sized Australian importer, a security liability of this magnitude can make an otherwise commercially viable project impossible.

This can affect not only the importer but also builders and homeowners who may have already selected a specific system, entered into contracts, paid deposits and designed their project around that product.

Where the relevant product is a specialised thermally broken system, slim-frame sliding door, tilt-and-turn window or large-format glazing system, a builder may not simply be able to replace it with a standard domestic product without redesigning part of the project.

In such cases, the measure may increase construction costs or reduce competition rather than create meaningful additional demand for Australian manufacturing.

Causation and broader market effects

I understand that the purpose of the anti-dumping framework is to address material injury caused by dumped or subsidised imports. However, I respectfully submit that the assessment of injury should carefully distinguish the effects of dumping from other relevant market factors.

In the Australian aluminium window and door market, those factors may include changes in construction demand, manufacturing costs, productivity, technology, product availability, customer preferences and the level of competition within specialised product segments.

Imported products are not always selected solely because of price. Customers may choose specialised systems because of technical or architectural characteristics, including thermally broken systems, tilt-and-turn windows, slim-frame sliding doors, large-format systems and specialised hardware.

Where only a limited number of Australian suppliers offer a comparable product, a very high anti-dumping measure may not simply transfer demand to a local manufacturer. It may instead reduce competition, increase market concentration and result in higher costs being passed through to Australian builders and homeowners.

I therefore respectfully request that the Commission consider whether injury attributed to imports has been adequately distinguished from other market and industry factors, the actual degree of substitutability between specialised imported and locally manufactured products, and the downstream effects of the measures on competition and construction costs.

Request for consideration

I respectfully request that the Commission consider:

1. the level of actual product diversity available within the Australian manufacturing market;
2. whether specialised imported systems are genuinely substitutable with products available from a broad range of Australian manufacturers;
3. the limited number of suppliers in some specialised categories, including thermally broken systems, slim-frame sliding doors, tilt-and-turn windows and oversized glazing systems;
4. whether broad anti-dumping measures could unintentionally increase market concentration and reduce competitive pricing in these specialised segments;
5. the downstream impact on Australian builders, homeowners, architects and construction costs;
6. whether specialised or technologically differentiated products should be considered separately where competition from a broad domestic supplier base does not exist; and
7. whether exporters that were not individually examined should have a reasonable pathway to provide verified commercial information and obtain an appropriate exporter-specific rate.
8. whether injury attributed to imports has been adequately separated from other relevant causes, including changes in construction demand, productivity, technology, product availability and customer preferences.

DENA WINDOWS supports fair competition and understands the importance of supporting Australian manufacturing.

However, support for domestic manufacturing should also preserve competition, innovation, product diversity and reasonable pricing for Australian consumers.

In my view, the strongest outcome for the Australian market is one where local manufacturers and imported products are able to compete fairly on quality, technology, performance, service and price, rather than creating a market where specialised products are available from only a very limited number of suppliers.

I would be pleased to provide further examples and technical information regarding the types of products we import and the differences between those systems and products commonly available within the Australian market.

Thank you for considering this submission as part of Investigation No. 691.

Official documents referred to

- Statement of Essential Facts - Investigation 691, published 14 October 2026.
- Trade Remedies Notice 2026/147 - Preliminary Affirmative Determination and security measures, published 14 October 2026.

Kind regards,

Jeff

Director

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