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Director – Investigations 1
Australian Trade Remedies Commission
By email: investigations1@atrc.gov.au

Re: Investigation 691 – Aluminium windows and doors from China: response to Statement of Essential Facts No. 691

The Timber, Furnishing and Textiles Union (TFTU) welcomes the opportunity to respond to the Australian Trade Remedies Commission's Statement of Essential Facts No. 691 (SEF 691), published on 14 October 2026. We strongly support the Commission's preliminary findings that dumped and subsidised aluminium windows and doors (AWD) exported from China have caused material injury to the Australian industry producing like goods. We also support the Preliminary Affirmative Determination and the taking of provisional securities from 15 October 2026.

This submission builds on the TFTU's original submission of 23 December 2025 (EPR 401). Our members work across aluminium window and door fabrication, glass processing, hardware and component manufacturing, installation and glazing. The injury identified by the Commission has consequences for Australian manufacturing workers and the skilled supply chains on which the industry depends.

Material injury: the Commission's findings confirm the concerns of workers

The Commission's detailed examination of tenders and quotations provides compelling evidence of the scale of injury. It identified approximately $350 million in lost tenders attributable to price undercutting by dumped and/or subsidised imports, together with $72.6 million in forgone sales to former customers that switched to those imports. The resulting estimated $422.6 million in lost and forgone sales during the investigation period represents approximately 15 per cent of the Australian AWD market by value (SEF 691, sections 1.2.10 and 9.10).

The Commission also identified systemic and material price undercutting of between 9 and 73 per cent in the tenders examined. This is not simply a question of Australian producers losing business to more efficient competitors. The Commission preliminarily found that dumping and subsidisation enabled Chinese exports to compete at prices lower than would otherwise have been the case, suppressing Australian prices, displacing sales and reducing profitability (SEF 691, sections 9.1 and 9.10).

The impact on employment, skills and investment

In our original submission we raised reduced hours and overtime, job losses, fewer apprenticeships and traineeships, delayed investment and declining utilisation of manufacturing facilities. SEF 691 provides further evidence consistent with these concerns. Ventora's indexed employment declined by 17 per cent from FY2022 to FY2025, while its capital

investment and capacity utilisation also declined. Of the 14 other Australian industry participants surveyed, 75 per cent reported reduced or deferred investment; respondents also identified redundancies, reduced hiring, reduced working hours and workforce uncertainty (SEF 691, sections 8.7 and 8.8).

Material injury is not an abstract economic impact. Lower production volumes mean fewer secure manufacturing jobs, fewer opportunities to train and retain skilled workers, and diminished prospects for investment in Australian facilities. These effects also flow through the wider supply chain, including domestic glass processors, component suppliers and installation trades represented by the TFTU. Once manufacturing capacity and skilled workforces are lost, rebuilding them is difficult.

Australian capability, market competition and housing supply

The TFTU supports the Commission's preliminary findings that Australian manufacturers produce like goods, compete directly with imported AWD and have the technical capability to participate across residential, multi-residential, high-rise and non-residential market segments, including buildings in Classes 1 to 9 (SEF 691, sections 4.7 and 9.1). Importantly, the Commission also recognised that the Australian industry is not required to supply the entire domestic market for dumped or subsidised imports to cause material injury (section 9.9.6).

Arguments about particular project specifications, construction schedules or housing affordability must be considered on their evidence; they do not, of themselves, displace the Commission's findings on substitutability, competition and injury. Claims concerning genuinely specialised goods should be assessed on their individual merits and through available statutory processes, rather than provide grounds for broad exclusions that would leave Australian-made like goods exposed to injurious imports.

Australia needs more housing, delivered efficiently and affordably. Maintaining viable domestic window and door manufacturing, glass processing and associated skills strengthens supply-chain resilience and gives builders and consumers a competitive local source of essential building products. Fair trade remedies and housing objectives are complementary, not mutually exclusive.

Particular Market Situation

The TFTU particularly welcomes the Commission's preliminary finding that Chinese government policies, state involvement and associated distortions created a Particular Market Situation in China's domestic AWD market during the investigation period (SEF 691, Appendix A). This is consistent with our December 2025 submission calling for a rigorous, evidence-based examination of non-market distortions affecting production costs, particularly in aluminium and glass. We support the Commission's approach to determining normal values where domestic prices and costs are rendered unsuitable by the identified distortions, and urge it to maintain these findings in its final report.

Effective final measures

The TFTU supports the Commission's proposal to recommend final anti-dumping measures at the full dumping margins established, rather than lesser duties, and countervailing duties where the statutory tests and non-negligible subsidy margins are met (SEF 691, chapters 11 and 12). We recognise that the proposed duty treatment differs between exporters, including the proposed countervailing measures for non-cooperating entities. Our position is that final

measures should reflect the Commission's verified findings and be sufficient to remedy the material injury identified, not that every exporter must be subject to identical duties.

Conclusion

The TFTU urges the Commission to uphold its preliminary findings on dumping, subsidisation, material injury, causation and the Particular Market Situation, and to recommend effective final measures consistent with those findings. This will help restore fair competition, defend existing jobs and apprenticeships, support investment and preserve Australian manufacturing capability.

Australian workers should be able to compete on a level playing field. Australia's trade laws exist to address unfairly traded imports—not to shield any manufacturer from legitimate competition—and should be applied effectively where the evidence establishes material injury.

Yours sincerely

Leo Skourdoumbis
Acting National Secretary
Timber, Furnishing and Textiles Union