G.JAMES

G.James Australia Pty Ltd
ABN 47 010 823 542
Administration
1084 Kingsford Smith Drive,
Eagle Farm Qld 4009
Phone: (07) 3877 2333
Email: admin@gjames.com.au

gjames.com

Postal Address
PO Box 1376
Eagle Farm BC
QLD 4009

2 November 2026

Mr David Latina
Australian Trade Remedies Commissioner
Australian Trade Remedies Commission
GPO Box 1632, Melbourne VIC 3001
Email: investigations1@adcommission.gov.au

Public Record

Case No 691 – Aluminium Windows and Doors exported from China

Dear Commissioner

I am writing on behalf of the G.James Glass & Aluminium Group (G.James) in support of the principal findings contained in the Statement of Essential Facts (SEF) for Investigation 691 and, importantly, the need for effective measures to address the dumping identified through the investigation.

The G.James Group, incorporating G.James Windows & Doors, G.James Façade Solutions, G.James Extrusion (Aluminium Products) and G.James Safety Glass (Glass Products) has participated actively in this investigation and has provided the Commission with detailed information about our business, the Australian market and the competitive conditions we have experienced. We appreciate the considerable work undertaken by the Commission in examining that evidence and the material provided by other interested parties.

We are a proudly Australian, family-owned manufacturing business with a history extending for more than a century. From our origins as a single glass business in Fortitude Valley, we have grown through sustained reinvestment in Australian manufacturing and today employ more than 1,750 people across more than 30 locations in metropolitan and regional parts of Australia. Our operations span aluminium extrusion, glass processing, residential and commercial window and door system design and manufacture, commercial façade solutions and installation.

That history shapes our perspective on this investigation. We have experienced many economic and construction cycles and have continually adapted, invested in new technology, developed new products and improved our manufacturing processes. We understand that markets change and we do not expect Australian manufacturers to be insulated from competition.

We do, however, believe that competition should occur on fair terms.

The findings in the SEF are therefore significant. They are also broadly consistent with what we have experienced in the market and the evidence we have provided during this investigation. In recent years, imported windows and doors have become increasingly influential in establishing the price against which Australian manufacturers are expected to compete. This pressure extends across residential, multi-residential and commercial markets.

For Australian manufacturing, confidence matters. Businesses such as ours make investment decisions over long time horizons. Investment in extrusion, glass processing, fabrication equipment, automation, product development, testing, factories and people cannot sensibly be considered only against the next project or the next financial year.

The same applies to skills. Manufacturing capability is built over many years through the collective knowledge of engineers, designers, production teams, installers, apprentices and experienced tradespeople. Once that capability is lost, it cannot necessarily be recreated simply because market conditions subsequently improve.

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G.James has continued to invest in Australian manufacturing and intends to continue doing so. Our previous evidence to the Commission outlined substantial ongoing investment in Australian production capability, including advanced automated glass processing and insulated glass unit capacity.

The confidence to make the next investment, develop the next generation of products, employ and train the next generation of skilled people, and maintain manufacturing capacity in Australia necessarily depends upon there being a market in which efficient domestic manufacturers have a reasonable opportunity to earn a sustainable return.

This is why we consider effective measures important.

Anti-dumping measures should not guarantee Australian manufacturers work, nor should they remove imported products from the Australian market. They should help restore the conditions in which the work is genuinely contestable.

We expect to compete. We compete with other Australian manufacturers every day and expect to continue competing with overseas manufacturers. Competition based on efficiency, innovation, product performance, service and quality makes Australian manufacturing stronger.

Dumping is different. Where pricing is distorted by dumping, the commercial signals received by manufacturers considering their next investment are also distorted. Over time, this affects utilisation, reinvestment, employment and ultimately the depth of Australia's manufacturing capability.

It is equally important that the introduction of measures is not viewed against an assumption that Australian industry lacks the products or capacity to respond.

G.James' own operations extend across detached residential construction, multi-residential buildings, commercial projects, window wall and sophisticated façade and monumental applications. Our capability encompasses a broad range of window and door products together with aluminium extrusion, glass processing, system design, engineering, testing, fabrication and installation.

The factories exist. The product systems exist. The engineering and testing capability exists. The skilled workforce exists. The capacity exists.

Australia does not need to create this manufacturing capability in response to Case 691. It already exists. What is required is confidence that this capability, and the future investment that builds upon it, can compete in a market where price is not distorted by dumping.

Confidential Commercial Information - relating to market, business capacity and product offer, provided in Private and Confidential submission.

After more than a century of manufacturing in Australia, G.James remains confident in the future of Australian manufacturing. The construction market will continue to evolve and demand increasingly sophisticated, energy-efficient and high-performing products. Australian manufacturers have demonstrated that they have the products, skills and capacity to respond to those requirements.

Maintaining and developing that capability requires competitive conditions that reward efficiency, innovation and investment rather than allowing those attributes to be overwhelmed by dumped pricing. For these reasons, G.James supports the principal findings contained in the Statement of Essential Facts and believes effective and durable measures are necessary.

Such measures will not remove competition. They will help restore fair competition, support the confidence required for continued investment and provide Australian manufacturers with the opportunity to compete for the future of this market on their merits.

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To comprehensively reflect the position of the Australian Aluminium window and door industry, G.James understand that the Australian Glass & Window Association AGWA (AWA-AGGA Ltd) will address SEF-691 via submission response. G.James supports AGWA's detailed representations on this matter, and requests that the Commission have regard to them in preparing the final report.

G.James continues to make itself available to the Commission throughout this trade remedies inquiry.

Yours sincerely,



Lewis Saragossi
Managing Director