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3 November 2026

Director
Investigations 1
Australian Trade Remedies Commission
GPO Box 2013
Canberra ACT 2601
Email: investigations1@atrc.gov.au

Dear Director,

Non-Confidential
Investigation No. 691 – Aluminium windows & doors from China
Industry submission in support of the Statement of Essential Facts

1. Introduction

Concept Aluminium makes this submission to Investigation 691 (**INV 691**) concerning aluminium windows and doors (**AWDs**) exported to Australia from the People's Republic of China (**China**), in response to Statement of Essential Facts No. 691 (**SEF 691**), published on 14 October 2026.[1]

Concept Aluminium is a supplier of Australian-made of extruded aluminium profiles, located in Victoria **supplying extruded profiles to AWD fabricators across the residential, multi-residential and commercial markets**. Concept Aluminium is part of the Australian industry producing aluminium extrusions, the principal input to AWDs.

Concept Aluminium supports the findings in SEF 691, the preliminary affirmative determination and the taking of securities from 15 October 2026.[2]

2. Supportive observations on SEF 691

Having reviewed SEF 691, Concept Aluminium supports the Commissioner's preliminary findings, in particular that:

- window wall is within the goods, and the Australian industry supplies AWDs across Class 1 to Class 9 buildings and has available capacity to do so;[3]

[1] EPR 691, document no. 501.
[2] SEF 691, sections 1.2, 1.2.1 and 13.3, pp. 10–12 and 216–217.
[3] Ibid, section 4.6.1, pp. 89–94; section 4.7.3, pp. 100–101.

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- a particular market situation existed in China for AWDs, arising from the influence of the Government of China over the Chinese aluminium and glass markets;[4]
- every selected exporter other than Altop Facade Co., Ltd exported the goods at dumped prices;[5]
- the Australian industry has suffered material injury caused by dumped and subsidised imports;[6] and
- dumping and subsidisation may continue.[7]

Aluminium extrusions are the largest input to AWDs. As a supplier to Australian AWD fabricators, Concept Aluminium experiences the effect of dumped AWD imports directly. Each project lost by a fabricator to dumped imports is also lost extrusion volume for Concept Aluminium.

3. Matters of concern

Based on its review of SEF 691, Concept Aluminium has concerns with certain of the preliminary outcomes, being:

- the claims by interested parties that the injury suffered by the Australian industry is attributable to its own input costs, including the price of Australian aluminium extrusions, rather than to dumped imports;
- the six exemption requests, which the Commissioner has not yet considered;[8]
- the construction of the aluminium extrusion benchmark, and the consistency with which the Commission has assessed whether exporters' aluminium costs were affected;
- the aluminium subsidy findings, including whether the extrusions purchased by the selected exporters were sourced from state-invested Chinese producers; and
- the proposed ad valorem form of interim dumping duty, the administrative practicalities of how the measures will operate in future accelerated reviews, and therefore the efficacy of the measures.

To comprehensively reflect the position of the Australian aluminium extrusion industry, Concept Aluminium understands that Capral Limited (**Capral**), as the largest manufacturer and distributor of aluminium extrusions, will address SEF 691 via submission response. Concept Aluminium supports Capral's detailed representations on these matters, and requests that the Commission have regard to them in preparing the final report.

[4] Ibid, section 6.4, pp. 132–134.
[5] Ibid, section 6.1, Table 12, p. 129.
[6] Ibid, section 8.1, p. 168; chapter 9.
[7] Ibid, section 10.2, p. 205.
[8] SEF 691, section 3.7, Table 10, pp. 74–77.

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4. Conclusion

Concept Aluminium supports the findings in SEF 691 and the publication of dumping and countervailing duty notices on AWDs exported to Australia from China. Concept Aluminium requests that the final report address the matters identified in section 3 above, having regard to Capral's submission.

Yours sincerely,

John Makris
Co-Director of Concept Aluminium Systems
30/10/2026

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Dear Director,

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Investigation No. 691 – Aluminium windows & doors from China
Industry submission in support of the Statement of Essential Facts

1. Introduction

John Makris makes this submission to Investigation 691concerning aluminium windows and doors exported to Australia from the People's Republic of China, in response to Statement of Essential Facts No. 691 published on 14 October 2026.[9]

John Makris is the Co-Director of Concept Aluminium Systems, an Australian supplier and designer of window and door systems in the commercial, multi-residential, and residential sector for Australian buildings, located in Broadmeadows Victoria. John Makris is a part of the Australian industry producing aluminium extrusions, the principal input to AWDs.

John Makris supports the findings in SEF 691, the preliminary affirmative determination and the taking of securities from 15 October 2026.[10]

2. Supportive observations on SEF 691

Having reviewed SEF 691, John Makris supports the Commissioner's preliminary findings, in particular that:

[9] EPR 691, document no. 501.
[10] SEF 691, sections 1.2, 1.2.1 and 13.3, pp. 10–12 and 216–217.

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- window wall is within the goods, and the Australian industry supplies AWDs across Class 1 to Class 9 buildings and has available capacity to do so;[11]
- a particular market situation existed in China for AWDs, arising from the influence of the Government of China over the Chinese aluminium and glass markets;[12]
- every selected exporter other than Altop Facade Co., Ltd exported the goods at dumped prices;[13]
- the Australian industry has suffered material injury caused by dumped and subsidised imports;[14] and
- dumping and subsidisation may continue.[15]

Aluminium extrusions are the largest input to AWDs. As a supplier to Australian AWD fabricators, John Makris experiences the effect of dumped AWD imports directly. Each project lost by a fabricator to dumped imports is also lost extrusion volume for John Makris.

3. Matters of concern

Based on its review of SEF 691, John Makris has concerns with certain of the preliminary outcomes, being:

- the claims by interested parties that the injury suffered by the Australian industry is attributable to its own input costs, including the price of Australian aluminium extrusions, rather than to dumped imports;
- the six exemption requests, which the Commissioner has not yet considered;[16]
- the construction of the aluminium extrusion benchmark, and the consistency with which the Commission has assessed whether exporters' aluminium costs were affected;
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- the proposed ad valorem form of interim dumping duty, the administrative practicalities of how the measures will operate in future accelerated reviews, and therefore the efficacy of the measures.

[11] Ibid, section 4.6.1, pp. 89–94; section 4.7.3, pp. 100–101.
[12] Ibid, section 6.4, pp. 132–134.
[13] Ibid, section 6.1, Table 12, p. 129.
[14] Ibid, section 8.1, p. 168; chapter 9.
[15] Ibid, section 10.2, p. 205.
[16] SEF 691, section 3.7, Table 10, pp. 74–77.

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To comprehensively reflect the position of the Australian aluminium extrusion industry, John Makris understands that Capral Limited as the largest manufacturer and distributor of aluminium extrusions, will address SEF 691 via submission response. John Makris supports Capral's detailed representations on these matters, and requests that the Commission have regard to them in preparing the final report.

4. Conclusion

John Makris supports the findings in SEF 691 and the publication of dumping and countervailing duty notices on AWDs exported to Australia from China. John Makris requests that the final report address the matters identified in section 3 above, having regard to Capral's submission.

Yours sincerely,

John Makris
Co-Director of Concept Aluminium Systems