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30th October 2026

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

Dear Commissioner

I am writing on behalf of Dowell Windows in support of the findings contained in the Statement of Essential Facts for Investigation 691 and the application of appropriate measures to address the dumping and injury identified through the investigation.

Dowell Windows has actively participated in this investigation and provided the Commission with information through the Australian Market Questionnaire process. We welcomed the opportunity to contribute factual industry data and subsequently engage directly with the Commission regarding our response and the Australian market.

Dowell has a particularly long association with Australian manufacturing. Our history dates to 1860, and windows have been an important part of the business for generations. Over that time, the company has continually adapted its products and manufacturing methods as Australian building practices, materials, technology and performance requirements have evolved. Today, Dowell manufactures nationally, with operations across Victoria, New South Wales, Queensland, South Australia, Tasmania and Western Australia.

The findings in the SEF are significant to our business because they recognise the effect that dumped imports have had on Australian manufacturers and the relationship between dumped pricing and the injury experienced by the industry.

Dowell has operated in competitive markets for generations. We understand that winning work is never guaranteed and that manufacturers must continually earn their place in the market through productivity, product development, quality and service. What concerns us is not competitive pressure itself, but circumstances where the commercial outcome is influenced by dumped pricing rather than the relative capability and efficiency of the businesses competing for the work

We also consider it important that the discussion around measures is informed by an accurate understanding of what Australian industry can supply.

There is sometimes a tendency to characterise Australian window manufacturing principally by reference to detached residential construction. That understates both the products available and the markets serviced by Australian manufacturers. The Commission itself concluded that Australian industry possesses the technical capability and manufacturing capacity to supply additional volumes across residential, multi-residential and non-residential construction, including Class 2 to 9 buildings.

While Dowell primarily services the detached residential market, we do so with a broad range of window and door solutions across our UrbanLine, DesignerLine and ThermaLine ranges, including thermally improved products responding to increasingly demanding building performance requirements. Importantly, our capability is not limited to detached housing, we also manufacture and supply products for projects across other building classes.

The introduction of Anti-dumping measures does not require Australian industry to suddenly create the products, skills or manufacturing infrastructure needed to respond. That capability exists. The Commission's own assessment found that a majority of responding industry members reported available, underutilised or scalable production capacity and an ability to increase production without significant additional capital investment.

The issue for Australian manufacturers is therefore not whether we should be protected from competition. We should not. The issue is whether companies that maintain Australian manufacturing facilities, develop products, employ and train people, and continually work to improve productivity have the opportunity to compete in a market that is not distorted by dumping. Confidence is an important part of that equation. Manufacturing decisions are made over long periods and investments in people, product development, equipment, automation and factory capability must ultimately be supported by confidence that an efficient operation has a reasonable prospect of earning a commercial return.

That is why the measures arising from Case 691 matter. Their purpose should not be to guarantee work to Australian manufacturers or prevent imports from participating in the market. Their purpose should be to correct the distortion identified by the Commission and allow competition to occur on a fairer commercial basis.

Dowell has been manufacturing in Australia for more than 160 years. We intend to continue innovating, investing and competing. The Australian window and door industry has the products, experience and manufacturing capacity to respond to the needs of the market, including beyond Class 1 construction.

For these reasons, Dowell Windows supports the findings contained in the Statement of Essential Facts and the application of effective measures to address the dumping and resulting injury identified by the Commission.

Yours sincerely,



Jeff Rotin
Chief Executive Officer
Dowell Windows Pty Ltd

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