ADVANCED WINDOWS

28th October 2026

The Commissioner

Australian Trade Remedies Commission

Dear Commissioner,

Anti-Dumping Case 691: Aluminium Windows and Doors Exported from the People's Republic of China – Response to the Statement of Essential Facts

The effect of dumped imports on our business goes beyond what the industry statistics can show. It has created considerable stress and uncertainty for everyone in our organisation, from the owners and management through to our factory employees, many of whom are concerned for their job security. We have never worked harder to secure the limited sales currently available to us. The findings in the Statement of Essential Facts (SEF) reflect our experience, and we strongly support the imposition of a final duty that restores a level playing field for Australian manufacturers.

About our business

Established in 2007, AAA Advanced Windows manufactures and sells aluminium windows and doors from our factory in Hallam, Victoria. Aluminium windows and doors are the largest part of our business. Our work includes residential housing and Class 2 buildings. We source all of our aluminium and glass locally, from Alspec and Viridian, and we are passionate about supporting the local industry.

Our experience of import competition

Over the past two years, we have consistently faced competing quotations for imported aluminium windows and doors at prices well below our own. As a result, we have lost work on price, and builders and customers have used imported pricing to put downward pressure on our quotations. Our margins have narrowed, we have been unable to pass on increases in our costs, our factory throughput has fallen, and we have withdrawn from pursuing some types of work.

Two recent housing projects illustrate this. In each case, the customer advised us directly that they had chosen imported product, and the imported price was substantially below ours. One of these was a like-for-like comparison of thermally broken windows and doors, so the price difference cannot be explained by a lower specification. Details of both projects are provided in the confidential section below.

Impact on our business and employees

These conditions have required us to reduce our factory workforce and restructure office roles to absorb the change. We are not currently in a position to recruit, as there is insufficient work to support additional staff. We have also deferred our plans for growth, including relocating to substantially larger premises and expanding our workforce. Further detail is provided in the confidential section.

Relationship to the findings of the SEF

As an independent manufacturer, separate from the applicant Ventora, our experience is consistent with several of the Commission's findings:

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- **Price undercutting.** The Commission found that half of all quotes and tenders reviewed were undercut by 30% or more, and that residential quotes were undercut by between 5% and 64% (SEF p190). Both of our examples were undercut by more than 30%, and one sits at the very top of the residential range.
- **Price suppression.** The Commission found that persistent undercutting suppressed the industry's ability to recover rising costs (SEF p18). This reflects our experience: our costs have increased, but market conditions have prevented us from passing them on.
- **Investment and employment.** Of the industry members surveyed by the Commission, 75% reported reduced or deferred investment and 33% reported workforce impacts (SEF p180). Our business has experienced both.

CONFIDENTIAL COMMERCIAL INFORMATION PROVIDED TO THE COMMISSION

The importance of effective measures

A fair competitive environment would allow us to proceed with our planned expansion and to grow our workforce again. If current conditions continue, we expect to have to reduce our staff further and to keep reassessing how we can remain a viable business with our existing overheads.

We support the submission made by AGWA and respectfully ask the Commission to recommend final measures that are effective and lasting, so that Australian manufacturers can compete on fair terms.

Yours sincerely,



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