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

Dear Commissioner

I am writing on behalf of AJ Aluminium to express our support for the findings in the Statement of Essential Facts (SEF) for Case 691 concerning fully and partially fabricated aluminium windows and doors from China.

AJ Aluminium is an Australian window and door manufacturer based in Mona Vale on Sydney's Northern Beaches. We were established in 2001 and have spent 25 years building our reputation as a local aluminium window and door fabricator. Our windows and doors are custom designed and made to meet the requirements of individual projects, and a large proportion of our work comes from repeat business and recommendations within the construction industry.

We work across both residential and commercial construction. In our commercial work, we work extensively with architects and builders to manufacture purpose-built windows and doors for projects including manufacturing, hospitality and retail applications.

I support the findings in the SEF because they recognise an issue that is very real for Australian manufacturers such as ours. We manufacture windows and doors here in Australia. That means employing people, maintaining manufacturing capability, buying materials, investing in equipment and facilities, and standing behind the products we manufacture. We have built our business over many years by focusing on quality, workmanship, customer relationships and delivering projects properly.

We accept that imports are part of the Australian market and that Australian manufacturers need to compete. Competition itself is not the issue. The problem arises when locally manufactured windows and doors have to compete against imported finished products that are being dumped into the Australian market. When that occurs, price competition is no longer taking place on an equal basis.

For a business like ours, the issue is bigger than an individual tender or project. Australian window manufacturers make investment decisions that extend over many years. We invest in machinery, factories, people, skills, systems and relationships with our customers. We cannot turn that capability on and off depending on what happens on the next project.

When manufactured windows and doors can be brought into Australia at dumped prices, it makes those longer-term investment decisions much harder to justify. Over time, the risk is that Australia loses manufacturing capacity and skills that are difficult to rebuild once they are gone.
Our own project experience is also relevant to the scope of the goods. AJ Aluminium has practical experience manufacturing and supplying window and door products that, when installed as part of a building façade, form a window wall as defined in AS 2047. These installations regularly include Class 2 to 9 buildings. This project experience supports the Commission's finding in the SEF that window wall falls within the goods under consideration and demonstrates the Australian industry's practical capability to manufacture and supply these products for Class 2 to 9 building applications.

Confidential Commercial Information Provided to the Commission
Relating to market, business capacity and product offer.

AJ Aluminium has spent more than two decades building a business based on Australian fabrication, custom manufacturing, quality and service. Our products are made to meet individual customer requirements, and we work closely with builders and architects to deliver windows and doors suited to particular projects. We want to continue doing that.

As noted above, we expect to compete, including against imported products. But Australian manufacturers should have the opportunity to compete on a fair commercial basis. In my view, that is ultimately what Case 691 is about.

The findings of the Commission recognise the impact dumped imports have had on the Australian industry and provide an opportunity to restore a fairer competitive environment. That gives businesses such as ours greater confidence to keep investing in Australian manufacturing, our people and the capability we have spent many years developing.

For those reasons, AJ Aluminium supports the findings of the Statement of Essential Facts and the implementation of effective measures arising from Case 691.

Yours sincerely

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Managing Director
AJ Aluminium Pty Ltd