

All Weather Windows / EZ Windows
Melbourne, Victoria

30 October 2026

To: Australian Trade Remedies Commissioner
Australian Trade Remedies Commission

Re: Anti-Dumping Case 691 – Response to Statement of Essential Facts – Impact on Australian Aluminium Window and Door Manufacturing

Dear Commissioner,

After 89 years of manufacturing windows and doors in Australia, we have reached the point where continuing our traditional manufacturing operation is no longer commercially viable. That is the reality facing our business, and it is why I strongly support effective and lasting measures to address unfairly priced imports of aluminium windows and doors from China.

My name is Michael Nayna, Director of All Weather Windows and EZ Windows, based in Melbourne, Victoria.

Our business has a proud history spanning 89 years in the Australian window and door industry. Over that time, we have manufactured and supplied aluminium windows and doors, supported the local construction industry and provided employment to generations of Australian workers.

We have always believed in manufacturing quality products, looking after our customers and, importantly, looking after our employees.

Unfortunately, the Australian manufacturing environment has changed dramatically.

The impact of imported competition

Over many years, we have experienced a substantial decline in sales of Australian-manufactured aluminium windows and doors.

One of the most significant contributing factors has been the increasing availability of imported Chinese products at prices we simply cannot compete against while maintaining a sustainable Australian manufacturing operation.

We have lost numerous opportunities to imported products, including substantial apartment and commercial projects.

In one particularly memorable apartment project on St Kilda Road in Melbourne, we were shown the successful quotation for Chinese-imported windows and doors by a builder with whom we had an excellent working relationship.

The price difference was extraordinary.

It demonstrated firsthand the enormous disadvantage Australian manufacturers can face when competing against imported products. The relevant quotation figures are provided in the confidential section below.

This was not simply an assumption about what a competitor might have charged. The builder was transparent with us and personally showed us the approved quotation.

Our experience is consistent with the price undercutting identified in the Statement of Essential Facts for Case 691, particularly the Commissioner's findings concerning competitive tenders and the displacement of Australian manufacturing opportunities.

The human cost of losing Australian manufacturing

What concerns me most is that this situation has affected far more than our profitability.

At one stage, our business employed 36 people. Today, that number has fallen to just three.

We have always been extremely loyal to our employees, and they have been equally loyal to us.

We paid our people well above minimum wages because we valued their skills, experience and commitment. Some employees remained with our business for as long as 40 years.

That level of loyalty is something we are immensely proud of.

These were not simply positions on a payroll. They were experienced Australian workers who built their careers, supported their families and contributed to the success of our business over decades.

Unfortunately, despite our best efforts, we could no longer sustain the manufacturing operation.

In my assessment, competition from cheaper imported products accounted for approximately 80% of the commercial pressure that contributed to our decline, although rising operating costs and other business pressures also played a part.

We have consequently had to change our business model, moving away from traditional in-house manufacturing towards a managed distribution operation.

That was not our preferred direction. It was a commercial decision driven by the need for our business to survive.

What has happened to the Australian small business?

I believe this investigation raises a much bigger question about the future of Australian manufacturing.

For 89 years, our business has contributed to the Australian economy. We have employed local people, paid our taxes, invested in our operations and paid our employees properly.

Yet when businesses like ours face sustained commercial pressure, it often feels as though small Australian manufacturers are left to manage entirely on their own.

We see major corporations receiving substantial attention and assistance when they experience difficulties, while smaller manufacturers struggle under increasing costs, obligations and competitive pressures.

I do not believe small businesses should have to rely on government handouts.

What we need is a fair opportunity to compete.

We are prepared to compete on quality, service, efficiency, innovation and price. What we cannot sustainably do is compete against imported products sold at unfairly low prices that undermine the viability of Australian production.

The consequences are real. Our business is living proof of that.

Why effective anti-dumping measures matter

I welcome the Commissioner's findings in the Statement of Essential Facts concerning dumped imports, price undercutting and the material injury experienced by the Australian industry.

Based on what we have experienced, I believe effective and durable anti-dumping measures are essential if Australia wants to retain a viable domestic aluminium window and door manufacturing industry.

I support the work being undertaken by the Australian Glass and Window Association (AGWA) in representing Australian manufacturers through this investigation.

My concern is not about preventing imports or avoiding legitimate competition. It is about ensuring that Australian businesses have a fair opportunity to compete without being continually undermined by unfairly priced products.

Once a manufacturing business closes its production facilities and loses its experienced workforce, rebuilding that capability is extremely difficult.

We have spent 89 years building our business. The fact that we have reached this position should be a warning about what is happening to Australian manufacturing.

Confidential business information provided to the Commission

Closing remarks

Commissioner, I respectfully ask that you consider what these findings mean for the smaller Australian manufacturers whose experiences may not be fully reflected in industry-wide statistics.

We have not simply lost sales. We have lost decades of accumulated manufacturing capability, experienced employees and the ability to continue operating the business in the way we did for generations.

I strongly support a final determination that delivers meaningful and lasting protection against unfairly dumped imports, consistent with the evidence and applicable law.

Australian manufacturers are not asking for special treatment. We are asking for a level playing field.

I hope the outcome of Case 691 will help ensure that other long-established Australian manufacturers do not find themselves in the same position as All Weather Windows.

Thank you for considering my submission.

Yours sincerely,

Michael Nayna

Director

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