**Submission to the Australian Trade Remedies Commissioner**
**Anti-Dumping Case 691 - Aluminium Windows and Doors from China**

Dear Commissioner,

I am writing on behalf of Aluco in support of the findings contained in the Statement of Essential Facts (SEF) for Anti-Dumping Case 691 and in support of effective and durable measures that restore a level playing field for Australian aluminium window and door manufacturers.

Aluco is a South Australian manufacturer and fabricator of aluminium windows and doors, supplying the commercial construction market using Capral and Alspec systems. We have a team of approximately 55-60 people locally and have built our business around manufacturing and supporting projects within South Australia.

Over the past five years we have witnessed a significant and growing shift toward imported aluminium window and door systems, particularly from China. In our experience, this trend has had a devastating effect on the multi-storey residential market and is increasingly impacting aged-care and similar developments.

The issue is no longer confined to isolated projects. Entire market sectors that were once serviced by Australian manufacturers are increasingly being supplied by imported systems. We have lost numerous projects over this period, including recent high-rise developments in Bowden. The projects involved typically carried window and door packages ranging from approximately $600,000 to over $4 million. In many cases builders have openly advised us that imported suppliers secured the work due to significantly lower pricing and have identified the successful import suppliers involved.

This experience is consistent with the Commission's findings regarding widespread price undercutting. From our perspective, imported products are regularly setting price expectations at levels that local manufacturers who employ Australian workers, maintain Australian facilities and comply with Australian operating costs cannot reasonably match.

What concerns us most is not simply the loss of individual jobs but the long-term displacement of Australian manufacturing capability. The multi-storey residential sector in particular has become increasingly dominated by imported product. If this trend continues unchecked, there is a real risk that Australian manufacturers will continue to lose market share in sectors that they have historically serviced successfully.

While imported suppliers may secure projects on price, our experience has also seen us engaged on numerous projects after imported systems were supplied. We have regularly been required to assist builders with additional flashings, trims, caulking, replacement glazing, hardware rectification, bespoke project elements and other supplementary works necessary to complete or rectify project requirements. These experiences highlight the practical value of maintaining a strong local manufacturing industry with the capability and resources to support projects throughout their lifecycle.

Businesses such as ours invest in local manufacturing facilities, training, skills development and long-term employment opportunities. In contrast, many import suppliers operate with limited local manufacturing capability and substantially smaller local workforces. The loss of manufacturing work to imports therefore has consequences beyond individual projects, affecting local employment, skills retention and future investment in Australian industry.

The findings contained in the SEF relating to price undercutting, lost sales opportunities and injury to Australian manufacturers closely reflect our experience in the South Australian market. For that reason, we support AGWA's submission and support the Commissioner's preliminary view that dumped imports have caused material injury to the Australian industry.

A fair and competitive market would allow Australian manufacturers such as Aluco to compete on merit, invest with confidence, maintain local employment and continue contributing to Australia's manufacturing capability. We are not seeking protection from fair competition. We are seeking a market where Australian manufacturers can compete on equal terms.
For these reasons, I support the continuation of effective anti-dumping measures and the implementation of a durable outcome that restores fair competition in the Australian aluminium window and door market.

Yours sincerely,
**Josh Burns**
**Alucorp Pty Ltd T/as Aluco**
South Australia