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31st October 2026

Director Investigations 4
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601

Dear Director,

Re: Anti-Dumping Case 691 – Aluminium Windows and Doors from China

I support the findings of the Statement of Essential Facts in Case 691 and the introduction of an effective final duty that provides a more level playing field for Australian aluminium window and door manufacturers.

I am writing from the perspective of AluGlaze, a Western Australian aluminium window and door fabricator. We fabricate aluminium windows and doors locally using multiple proprietary systems available in Australia and install our products across residential and commercial projects, including Class 2–9 buildings. Aluminium windows and doors represent 85-100% of our business and we currently employ approximately 30 people.

Our market is extremely competitive. In our experience, customers are prepared to make procurement decisions substantially on price, sometimes ahead of quality, and will consider offshore sourcing where it offers a significant saving.

We do not generally receive the competing tender details when we lose a project, so I cannot put a reliable percentage on the difference between our pricing and imported alternatives. However, we do compete against contractors that regularly source windows and glass offshore, and we have lost projects to those competitors. I have provided one recent example in the confidential section below.

The effect on our business is broader than simply winning or losing individual tenders.

To remain competitive, AluGlaze regularly has to absorb increases in overheads and labour costs, including the costs of our factory and site employees, fuel, power and property. We are also often required to reduce the margin available on aluminium and glass products to remain competitive.

This reflects our own experience of the price suppression identified in the SEF. The Commissioner found that persistent undercutting suppressed the Australian industry's ability to recover rising costs and achieve sustainable pricing (SEF, p.18), and also identified margin compression and increased price competition as an issue reported by Australian industry members (SEF, p.180).

The longer-term consequence is important. Even when AluGlaze is busy, uncertainty around future workload and an extremely competitive market affect our willingness and ability to invest for the long term.

We have operated with a very concentrated team to deliver our projects, particularly across our overhead positions such as project management, factory management and administration. Investment decisions have also been affected, including a significant factory expansion or relocation decision that has been deferred for an extended period. Further detail is provided in the confidential section below.

In my view, this is one of the less visible consequences of sustained offshore price competition. Market volatility does not just affect today's tender. It affects whether local manufacturers have the confidence to invest in larger facilities, advanced manufacturing equipment, additional employees and training.

That is particularly relevant in Western Australia. Australian manufacturers need sufficient confidence in future demand to invest in local capacity and develop the people needed to support it. In our case, a fairer and more sustainable competitive environment would give us greater confidence to hire and train additional employees, expand our factory capacity and invest in manufacturing equipment as part of a transition towards a more advanced manufacturing platform.

Conversely, if current conditions continue, AluGlaze is likely to continue operating conservatively, with limited focus on additional training and advanced manufacturing investment.

I also believe there is an important point concerning Australian manufacturing capability. AluGlaze manufactures for Class 2–9 buildings and has demonstrated the capacity to fabricate window-wall products locally. Recent examples of projects that we won and manufactured are provided below on a commercial-in-confidence basis.

CONFIDENTIAL

CONFIDENTIAL COMMERCIAL INFORMATION PROVIDED TO THE COMMISSION

These projects are practical examples from our own business of Australian manufacturing capability in the Class 2–9 market, including the local manufacture of window-wall products.

The issue for AluGlaze is therefore not that we are unable or unwilling to manufacture these products in Australia. We are already doing so.

The issue is whether Australian manufacturers can compete in a sufficiently stable and commercially sustainable market to justify continued investment in capacity, equipment, people and skills.

From my perspective, offshore competition has contributed to market volatility and a reluctance to expand local capacity and invest sufficiently in training and development. At a time when Western Australia needs additional housing delivery and manufacturing capacity, I believe that outcome is counterproductive.

The practical difference that a more level competitive environment could make to AluGlaze is quite tangible. We would have greater confidence to increase hiring and training, expand our factory capacity and add manufacturing equipment to help transition the business towards an advanced manufacturing platform.

For those reasons, I support AGWA's position where it is consistent with the findings of the SEF and support an effective and durable final measure that allows Australian manufacturers to compete on a more level playing field.

The project information and commercial information contained in this letter is commercially sensitive and is provided to the Commission on a confidential basis.

Yours sincerely,
AluGlaze



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