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Alutec Windows Pty Ltd

30/10/2026

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

Dear Commissioner

I write on behalf of Alutec Windows in support of the findings set out in the Statement of Essential Facts for Anti-Dumping Case 691.

Alutec Windows is an Australian manufacturer of aluminium windows and doors based in Ingleburn, NSW. Our business has extensive experience supplying commercial and multi-residential construction, including significant high-rise developments. We manufacture locally and provide an end-to-end service encompassing fabrication and installation.

We believe our experience is particularly relevant to claims made during this investigation regarding the capability of Australian manufacturers to service larger commercial and multi-residential projects, including buildings within Classes 2 High rise. For Alutec, this is not a theoretical capability. It is work we undertake as part of our normal business.

Our project history includes substantial multi-residential and high-rise developments requiring aluminium windows and doors designed and manufactured to meet demanding structural, weather, acoustic and architectural requirements. This includes projects for major developers and builders such as Meriton and others involving high-rise window wall suites, commercial sliding doors and high-wind load and acoustic glazing.

Our experience is also directly relevant to the discussion concerning window wall applications. In many high-rise and multi-residential projects, the external wall incorporates a series of adjoining aluminium window assemblies extending across significant areas of the building façade. The windows are engineered and manufactured to meet the particular requirements of the project, including wind pressure, water penetration, air infiltration, structural performance, acoustics and glazing.

The scale and configuration of these windows naturally changes with the building. On taller buildings, windows may be larger, repeated across floor plates and assembled together across the face of the building, creating what is commonly described as a window wall. From a manufacturing perspective, however, the work remains centred on the fabrication and assembly of aluminium windows and doors to meet the performance requirements of the particular building.

Alutec has practical experience manufacturing and supplying windows for these applications. That experience demonstrates that Australian manufacturing capability extends well beyond detached housing or individual window openings. Australian manufacturers are already supplying substantial areas of the external walls of multi-storey buildings through adjoining window assemblies designed for the structural, weather and acoustic conditions of those projects.

This experience is important when considering claims that Australian manufacturers lack the capability or products required to service the high-rise and multi-residential market. The performance requirements may increase with building height, exposure, design and engineering requirements, but this should not be confused with an absence of Australian manufacturing capability.

Alutec's own project experience demonstrates this. We have supplied substantial multi-residential developments, including projects associated with Meriton, and have manufactured window assemblies for high-rise applications. These are real Australian projects being serviced by Australian manufacturing.

For this reason, we support the Commission's finding that the Australian industry supplies across building Classes 1 to 9. In our experience, the fact that a project is multi-residential, commercial or high-rise does not of itself place its aluminium windows and doors beyond the capability of Australian manufacturers.

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

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There will naturally be projects with particular architectural, engineering or commercial requirements, just as there are across all areas of construction. Australian manufacturers compete for projects based on those requirements and we have and must demonstrate that the proposed products and systems can achieve the required performance and ultimately value for the customer.

Alutec supports competition. We compete for work every day against other Australian manufacturers and imported products, in highly competitive markets What is important is that competition occurs on fair commercial terms. Where dumped or subsidised imports enter the Australian market at unfair prices, they have the potential to undermine Australian businesses that have maintained the people, equipment, technical knowledge, compliance systems and manufacturing capability necessary to service the Australian construction industry.

For these reasons, Alutec supports the Commission's findings in the Statement of Essential Facts and the application of appropriate measures to address the dumping and subsidisation identified by the Commission.

To assist the Commission, we have also provided confidential information identifying examples of recent Class 2 to 9 and multi-storey projects supplied by Alutec. These examples demonstrate our actual experience supplying aluminium windows and doors into this part of the Australian construction market.

Alutec would be pleased to provide the Commission with further information regarding our manufacturing capability or project experience should that assist its consideration of the matter.

Yours sincerely

Jason Doriguzzi
Managing Director
Alutec Windows Pty Ltd