Architectural
Windows & Doors PTY LTD

Showroom | 5/43 Lang Parade, Milton, 4064
Factory | 75 Kremzow Road, Brendale, 4500
Ph: (07) 3889 8800 | Fax: (07) 3889 8900 | 1300 65 33
www.windowsdoors.com.au | sales@windowsdoors.com.a

23 October 2026

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

Re: Investigation No. 691 – Aluminium Windows and Doors from China

Dear Director,

Support for Statement of Essential Facts No. 691

I am writing on behalf of **Architectural Windows & Doors Pty Ltd**, an Australian manufacturer/fabricator of aluminium windows and doors operating in Queensland.
We support the findings in Statement of Essential Facts No. 691 and the ongoing efforts of the Australian Glass and Window Association (AGWA) and the Australian industry applicants to achieve a fair and level playing field for Australian manufacturers.

In particular, we support the Commissioner's preliminary findings that aluminium windows and doors exported from China were dumped, that the Australian industry has suffered material injury as a result of dumped and subsidised imports, and that dumping and subsidisation may continue.

As an Australian fabricator, we believe Australian manufacturers are capable of supplying aluminium windows and doors across a broad range of residential and commercial applications. We support the finding that the Australian industry is not confined to Class 1 buildings and supplies products across Class 1 to Class 9 buildings.

We are entering our 25th year of operation, supplying Class 1 high-end residential projects. Our business model is built on technical expertise, producing bespoke shop drawings, managing energy and other regulatory requirements, providing active on-site support, and standing behind our workmanship within Australia's strict regulatory framework.

In our own business, competition from imported aluminium windows and doors from China has affected us through lost projects, decreased turnover and a reduced ability to compete in the market. We are seeing architects and clients presented with imported Chinese quotations at prices that are impossible to reconcile with legitimate manufacturing and compliance costs. On a recent Class 1 residential project, we lost the job to a Chinese supplier after our quotation—and a comparable quote from another local supplier—were undercut by an extreme margin by a delivered price from China.

This loss of work and turnover directly jeopardises our operations. Operating a legitimate manufacturing business in Australia requires carrying substantial fixed overheads—including Australian wages, trade licences, insurances, workplace health and safety compliance, energy costs, plant and equipment, and industry accreditation. When dumped imports erode our turnover, those fixed costs cannot be absorbed. If these market conditions continue alongside the already extreme costs impacting the building industry, we may not be able to continue operating.

While I understand that product quality and compliance are outside the scope of an anti-dumping investigation, non-compliant imported products further damage our industry and undermine a level playing field. Local manufacturers are independently audited and carry statutory design and performance liabilities for up to 10 years under Queensland building laws, whereas imported products frequently lack traceable quality assurance between laboratory test prototypes and containerised mass production, leaving local builders and homeowners exposed when defects or dimension errors occur on site.

Continued on Page 2

Architectural
Windows & Doors PTY LTD

Showroom | 5/43 Lang Parade, Milton, 4064
Factory | 75 Kremzow Road, Brendale, 4500
Ph: (07) 3889 8800 | Fax: (07) 3889 8900 | 1300 65 33
www.windowsdoors.com.au | sales@windowsdoors.com.a

We therefore support the imposition of effective measures that address the injurious effects of dumping and subsidisation and allow Australian manufacturers to compete on a fair and sustainable basis.

We also support AGWA continuing to represent the interests of Australian fabricators through the remainder of this investigation and in responding to the matters arising from the SEF.

This investigation is important to our business and to the future competitiveness of Australian window and door manufacturing. We encourage the Commission to ensure that the final measures provide a meaningful and durable level playing field for Australian industry.

Yours sincerely,

James Anderson
Operations Manager
Architectural Windows & Doors Pty Ltd