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27 October 2026

Australian Trade Remedies Commissioner

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

Dear Commissioner,

I support the findings in the Statement of Essential Facts and support a meaningful and durable final outcome that helps restore a level playing field for Australian manufacturers of aluminium windows and doors.

BGS Windows has been operating for more than 20 years and has been under my management for the past six years. We fabricate, supply and install aluminium windows and doors throughout Bunbury and the South West of Western Australia. Aluminium windows and doors are the core of our business. We employ between 13 and 20 people and work across residential, renovation and commercial projects, ranging from simple sheds through to custom architectural homes, shopfronts and commercial buildings.

We primarily manufacture using AWS systems and also work with Capral and Alspec products. Like many regional manufacturers, we rely on a network of local suppliers and service providers that support our industry.

In my experience, imported aluminium windows and doors are having a significant impact on our business.

Over the last 12 months, I estimate that we have lost approximately $600,000 in turnover due to imported products. We have had multiple builders move away from locally manufactured products and towards imported products. These are builders we previously worked with regularly and who now source imported products because of the price difference available to them.

Builders have openly told us that imported products are often more than 30% cheaper than our locally manufactured products and, at times, close to 50% cheaper. In a market where price is

often the deciding factor, that type of price gap makes it extremely difficult for Australian manufacturers to compete fairly.

What we are experiencing appears consistent with the Commission's findings regarding price undercutting and injury to Australian manufacturers. From my perspective, this is not an abstract issue. It is something we deal with every day when pricing work and trying to maintain a viable manufacturing business in our region.

The impact extends beyond simply losing individual projects. We have invested heavily in the equipment, facilities and people required to manufacture windows and doors locally. Those costs remain whether our factory is busy or not. As work volumes reduce, we continue to carry the same manufacturing overheads while facing pressure to reduce our margins to remain competitive. This has had a significant impact on profitability.

We also regularly find ourselves in situations where our pricing is used as a benchmark while imported products are ultimately supplied instead. In effect, Australian manufacturers are asked to quote, only to lose the work to imported products that are significantly cheaper.

If current market conditions continue, I believe businesses like ours will continue operating at a reduced scale but will find growth increasingly difficult unless they move into importing themselves. It will become harder to employ local staff, pay Australian wages and maintain the level of service and support that builders and homeowners expect from a local manufacturer.

My concern is that over time Australian manufacturers will shrink further, compete for fewer projects and operate on increasingly reduced margins. The easier work will continue moving offshore while local manufacturers are left fighting over a smaller pool of work. Ultimately, that means fewer local jobs, less investment and less confidence in Australian manufacturing.

CONFIDENTIAL COMMERCIAL INFORMATION PROVIDED TO THE COMMISSION

In closing, I do not have a problem with imported products being sold in Australia. Customers should be able to choose the product they believe best suits their needs and budget.

My concern is that the choice should be made in a fair market. When products are available at a fraction of the price, most people will naturally take the cheaper option. Australian manufacturers who invest in local staff, local facilities and long-term support are placed at a significant disadvantage.

What may not be obvious from the industry statistics is that local manufacturers remain here long after the sale is complete. We support builders and homeowners into the future, stand behind our products and regularly assist when problems arise. In many cases, we are later asked to help resolve issues associated with products that were originally chosen because they were cheaper.

Everybody deserves a choice, but that choice should exist within a genuinely fair and sustainable market. Australian manufacturers can compete and innovate, but it becomes extremely difficult when the price gap is so large that cost alone determines the outcome.

For these reasons, I support the continuation of effective and durable measures arising from Case 691 and support AGWA's submission seeking a level playing field for Australian manufacturers of aluminium windows and doors.

Yours sincerely,

Toby Jon Daniel
Director
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