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Australian Trade Remedies Commissioner
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601

RE: Investigation 691 – Aluminium Windows and Doors Exported from the People's Republic of China – Submission in Response to Statement of Essential Facts (SEF 691)

Dear Director,

I am writing this submission on behalf of our Australian manufacturing business in response to the Statement of Essential Facts (SEF 691). We strongly support the findings of the SEF and the urgent need for a level playing field through the imposition of definitive anti-dumping duties. Without effective and durable measures, local manufacturing operations like ours simply cannot continue to compete against goods exported at dumped, unsustainable price levels.

Our business manufactures and installs architectural aluminium window systems for architectural homes, operating throughout South East Queensland. Aluminium windows and doors are the core of our business. We directly employ 20 to 30 full-time staff, alongside engaging 10 to 20 subcontract installation personnel. We maintain significant local fabrication plant, equipment, and skilled labour to deliver fully engineered, compliant architectural products to the Queensland building industry.

What we are witnessing in the market is an aggressive displacement of local manufacturers by imported aluminium windows and doors. Over recent years, we have faced dramatically cheaper competing quotes, lost significant jobs on price alone, and seen regular clients bring imported supply prices to our negotiation table. Increasingly, builders who previously supported local fabrication have stopped seeking local quotations altogether, knowing local manufacturers cannot match dumped offshore supply prices.

This commercial reality directly reflects the Commission's findings in SEF 691. The Commission established that purchase decisions in our sector are driven predominantly by quotes and tenders, with price being a deciding factor (p. 15). The Commission also found widespread undercutting across residential and non-residential building classes—with half of all examined tenders undercut by 30% or more, and more than a quarter undercut by 40% or more (p. 190). The Commission further recognised the phenomenon of forgone sales, where local manufacturers are completely shut out from bidding because the price gap is insurmountable (p. 190).

Our direct experience demonstrates that these undercutting margins are not theoretical. In recent tender situations across multi-residential projects, we have seen imported supply pricing come in at roughly half our manufacturing cost. Specific details of these lost projects are detailed in the confidential section below.

Losing these jobs to dumped imports creates an acute commercial ripple effect across our business. When we lost a major project to an imported quote, that regular builder client continued to use the dumped price benchmark against us. To retain any work with them and keep volume flowing through our factory, we were forced to heavily squeeze our pricing on subsequent jobs. This aligns exactly with the Commission's finding that 92% of surveyed industry members have suffered severe margin compression and price suppression, unable to recover rising input and operating costs (pp. 18, 180).

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CONFIDENTIAL COMMERICAL INFORMATION PROVIDED TO THE COMMISSION

If we cannot retain our regular customers and keep our factory operating at or near capacity, we cannot cover our fixed overheads, service our machinery, or keep our factory operations profitable. While industry statistics record these trends as capacity utilisation and margin declines, the practical reality for a mid-sized Australian fabricator is blunt: if these market conditions continue unchecked, we face either severely downsizing our workforce and operations or closing our doors entirely.

A fair, level playing field established by meaningful, durable dumping duties is essential. We do not seek insulation from fair competition, but we cannot compete against offshore supply prices that do not reflect market reality. Effective measures under Case 691 will give Australian fabricators the confidence to retain staff, protect local trades and subcontractors, and sustain Australian manufacturing capacity.

We strongly support the submissions made by the Australian Glass and Window Association (AGWA) and urge the Commissioner to recommend definitive dumping duties in line with the SEF findings.

Yours sincerely,

Luke Sefton
Brett's Architectural Window Solutions