Castle Glazing ACT

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28/10/2026

Australian Trade Remedies Commissioner
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Canberra ACT

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

Dear Commissioner,

I strongly support a fairer competitive environment for Australian aluminium window and door manufacturers. From my experience running a local fabrication and installation business, it is becoming increasingly difficult to compete with the prices being offered in the market. I believe effective and lasting measures are needed to give Australian manufacturers a fair chance to win work and keep their businesses operating.

We fabricate and install aluminium windows and doors in the ACT and surrounding region, employing around 10 people. Aluminium windows and doors are our entire business, so when we lose work in this market, there isn't another major part of the business to fall back on.

I have missed many jobs because I cannot compete on price. In my experience, I can be around 50% higher than the competing price. At those prices, I simply cannot make the numbers work and continue operating sustainably.

This is not just about missing individual jobs. We have had less work coming through and I have had to cut staff. That is the real impact this competition is having on my business. A local manufacturer can have the people, skills and facilities to do the work, but that doesn't help if the price difference means we cannot win the job in the first place.

The Statement of Essential Facts (SEF) discusses significant price undercutting in tenders and quotes, including its finding that half of the tenders and quotes reviewed were undercut by 30% or more (SEF, p. 190). That finding is consistent with the kind of price pressure I have experienced, although my own experience is what I can speak to directly.

I have also seen that Australian businesses can manufacture and supply window-wall products for substantial commercial and other building projects. Our own project experience demonstrates that local manufacturers have the capability to undertake this work. The issue for us is being able to compete fairly for those opportunities.

I want to be able to win more work, keep people employed and continue manufacturing locally. If the current conditions continue, it will remain difficult for businesses like mine to maintain their workload and workforce. A fairer competitive environment would give us a better chance of winning projects on price while continuing to manufacture and install locally.

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I support AGWA's work on this case and ask the Commissioner to recommend effective and durable measures that properly address the injury caused by dumped imports. The outcome needs to make a genuine difference to competition in the Australian market, rather than leave local manufacturers continuing to lose work because they cannot match the prices being offered.

I have provided confidential details below of a project we missed and examples of projects our business has manufactured. I hope this information assists the Commission in considering both the impact on independent Australian businesses and the industry's ability to supply window-wall products.

CONFIDENTIAL COMMERCIAL INFORMATION PROVIDED TO THE COMMISSION

In closing, I want to see a market where Australian manufacturers have a genuine opportunity to compete and win work. We have the capability to manufacture these products locally, but we need a fairer competitive environment to keep doing so and to provide ongoing employment.

Thank you for considering my experience and the information provided in support of Case 691.

Yours sincerely,



Daniel Jarrett
Director – Castle Glazing ACT