30 October 2026

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

To the Anti-Dumping Commission

Com-Al Windows Pty Ltd
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Maddington WA 6109

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Re: Statement of Essential Facts – Investigation No. 691 – Certain Aluminium Windows and Doors Exported from China

Dear Director,

Submission in response to Statement of Essential Facts No. 691

I write on behalf of Com-AL Windows Pty Ltd in response to the Statement of Essential Facts No. 691 concerning aluminium windows and doors exported from the People's Republic of China.

Com-AL Windows welcomes and supports the Commissioner's preliminary findings that dumped and subsidised imports have caused material injury to Australian manufacturers of aluminium windows and doors and that measures should be imposed. The SEF identifies injury including lost sales and production, price suppression, reduced market share, reduced profits and profitability, reduced capital investment, lower capacity utilisation and reduced productivity.

These findings reflect the commercial pressures experienced by Australian manufacturers competing for projects in the Australian construction market.

Com-AL Windows is a Western Australian manufacturer with more than 52 years' experience in the commercial window and glass industry. Our business specialises in the design, manufacture and installation of commercial aluminium windows, doors and curtain walling systems, including commercial and cyclonic glazing, thermally broken window systems and associated façade products. We maintain our own trucks, cranes and access equipment and have continued to investing modernising our processes and manufacturing automation.

Looking at the case, I think it is important to highlight that Com-AL Windows, are not simply a manufacturer servicing detached residential housing. A substantial part of what we do is inherently connected with commercial, institutional, multi-residential and other complex construction projects across almost all building classes.

These projects involve project-specific design and drafting, engineering coordination, structural and weather performance requirements, specialised glazing, fabrication, logistics, programming and installation on site.

That is real Australian manufacturing capability.

The suggestion made during this investigation that Australian industry is primarily focused on Class 1 residential construction does not reflect our business or our experience of the Western Australian market. The Commission has appropriately found that Australian industry is capable of supplying across all market segments, including multi and high-rise residential and non-residential construction and Class 2 to Class 9 buildings. It also found evidence of available and scalable Australian manufacturing capacity.

Our own operations provide practical evidence supporting that conclusion.

Com-AL Windows has delivered work across substantial commercial and institutional projects. Publicly identified examples of our work include Perth Museum, Heath Ledger Theatre, St Thomas More College and the One Subiaco apartment project.

Our participation in projects of this nature demonstrates that Australian window manufacturers have the people, equipment, systems and technical capability required to participate in sophisticated non-residential and multi-residential construction.

Note: Confidential Commercial Information has been shared with the Commission.
(Relating to market, business capacity and product offer.)

We believe this practical project experience is important because discussion about Australian manufacturing capability can otherwise become theoretical. We design, manufacture, deliver and install these products in Australia every day.

We also support the Commission's conclusion that differences between residential, multi-residential and non-residential construction do not mean that they represent completely disconnected markets.

The Commission has recognised that larger and more complex projects may have additional engineering, testing, certification, design and delivery requirements, while concluding that these differences do not create wholly separate markets. That accords with our commercial experience.

Indeed, it is in these larger project environments that Australian manufacturers such as Com-AL Windows directly encounter international competition. The SEF's finding that dumped and subsidised Chinese goods undercut Australian industry pricing across residential, multi-residential and non-residential market segments is therefore particularly important to our business.

Australian manufacturers should be able to compete for these projects on the basis of productivity, quality, technical capability, service and genuine commercial competition, rather than against prices distorted by dumping or subsidisation. The injury identified is significant as identified in the SEF. For Australian manufacturers, losing projects does not simply mean losing turnover. It affects factory utilisation, employment, apprenticeships, equipment purchases, technology investment and the confidence required to undertake future capital expenditure.

Manufacturers make investment decisions over many years. Machinery, factory capacity, product development, testing, training and skilled employees cannot simply be switched on and off from project to project. Businesses need reasonable confidence that they will have an opportunity to compete for future work on sustainable commercial terms. For these reasons, Com-AL Windows strongly supports the imposition of ongoing dumping duties and, where applicable, countervailing duties following completion of the investigation.

Com-AL Windows therefore supports the key findings contained in SEF 691 and asks the Commission to maintain those findings in its final report and recommend the imposition of appropriate ongoing dumping duties, together with countervailing duties where the statutory requirements are satisfied.

We are not asking to be protected from competition. We are asking for the opportunity to compete fairly.

A durable trade remedy will give Australian manufacturers the confidence to continue employing people, investing in equipment and capability, developing products and competing for the next generation of Australian construction projects.

Should you wish to discuss the above, please feel free to write or call on the number below.



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