Concept Windows Pty Ltd
4 Tacoma Circuit,
Canning Vale WA, 6155
PO Box 1373,
Canning Vale WA 6970
Australia

P 08 6218 5111
E admin@conceptwindows.com.au

ABN 72 163 041 727
ACN 163 041 727

28/10/26

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

Dear Commissioner

Re: Case 691 – Statement of Essential Facts

I am writing on behalf of Concept Windows to express our support for the findings in the Statement of Essential Facts (SEF) for Case 691 concerning fully and partially fabricated aluminium windows and doors from China.

Concept Windows is a Western Australian, family-owned window and door manufacturer established in 2003. We manufacture and supply aluminium windows and doors across both the residential and commercial construction markets and have built our reputation around product quality, reliable service and performance.

Our experience extends across a very broad range of building types. Over many years we have supplied aluminium window and door packages for apartment developments, hospitals and medical facilities, aged care, student accommodation, education facilities, commercial developments and residential projects throughout Western Australia.
We support the findings in the SEF because they recognise an issue that is very real for Australian manufacturers such as ours. We manufacture windows and doors here in Australia. That means employing people, maintaining manufacturing capability, purchasing materials, investing in equipment and facilities, and taking responsibility for the products we manufacture and supply.

For a business such as ours, the issue is bigger than an individual tender or project. Manufacturing capability is built over many years. We invest in machinery, facilities, people, skills, technical knowledge, systems and relationships with builders and customers.

When fully manufactured windows and doors can enter Australia at dumped prices, it makes those longer-term investments more difficult to justify. Over time, the risk is that Australia loses manufacturing capability and skills that are difficult and expensive to recreate once they are gone.

Our own project experience is also highly relevant to the scope of the goods considered in this investigation.
Concept Windows is not limited to supplying Class 1 residential construction. We have considerable practical experience manufacturing and supplying aluminium window and door products across the commercial and multi-residential market, including Class 2 to 9 buildings. Our published portfolio demonstrates participation in apartment, hospital, medical, aged-care, student accommodation, education and other commercial construction.

That experience includes projects where the windows and doors supplied by Concept Windows, when installed as part of the building façade, form window wall as defined by AS 2047.

This is important because it demonstrates that Australian manufacturers have practical capability to manufacture and supply window and door products for Class 2 to 9 buildings, including window wall applications. These are not markets or products that sit outside the capability of Australian window manufacturers.

Concept Windows has spent more than two decades developing Australian manufacturing capability across both residential and commercial construction. Our public project history alone includes substantial apartment developments such as Arthouse Apartments, LIV Apartments, Vantage RiversEdge Apartments and Edition Como, as well as projects including SwanCare Aged Care Facility, St Georges College West Wing and Shenton College.

This is the manufacturing capability we want to continue investing in. We expect to compete, including against imported products. However, Australian manufacturers should have the opportunity to compete on a fair commercial basis. In my view, that is ultimately what Case 691 is about.

The Commission's findings recognise the impact that dumped imports have had on the Australian industry and provide an opportunity to restore a fairer competitive environment. Effective measures would give manufacturers such as Concept Windows greater confidence to continue investing in Australian manufacturing, our people and the capability we have developed over many years.

For those reasons, Concept Windows supports the findings of the Statement of Essential Facts and the implementation of effective measures arising from Case 691.

Yours sincerely



Troy Johnson
Executive Director

P 08 6218 5111
M 0447 064 466
E troy.j@conceptwindows.com.au
4 Tacoma Circuit, Canning Vale WA 6155
www.conceptwindows.com.au