CREATIVE WINDOWS

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28 October 2026

David Latina
Commissioner
Australian Trade Remedies Commission

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

Dear Commissioner,

I strongly support the findings of the Statement of Essential Facts in Investigation 691 and the introduction of an effective final duty that gives Australian manufacturers a genuine opportunity to compete on a level playing field.

I am writing from the perspective of Creative Windows, an Australian manufacturer and installer of aluminium windows and doors based in Braeside, Victoria. We employ approximately 40 people and operate across Australia. Aluminium windows and doors are a major part of our business and local manufacturing is at the core of what we do.

The biggest concern for me is not simply losing individual projects. It is the real possibility of losing manufacturing from our business altogether, and with it hard-working blue-collar Australian jobs that may have no equivalent work to move into.

What we are seeing in the market:

We regularly compete against Chinese-manufactured aluminium windows and doors at prices that we cannot commercially match as a local manufacturer.

In some cases, we have seen imported prices that are below our own cost to manufacture an equivalent product in Australia. Based on projects we have personally tendered, we have lost work where Chinese imported pricing has been approximately 50% to 70% below our locally manufactured offer.

These are not theoretical numbers to us. We have experienced this directly on real projects. Specific examples and commercially sensitive pricing information are provided in the confidential section below.

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The effect goes beyond simply losing those projects. This level of pricing places pressure on our margins and makes it difficult to recover increases in material, labour and other manufacturing costs. It also changes the decisions we make about which projects are worth pursuing and whether further investment in Australian manufacturing makes commercial sense.

Our experience is therefore consistent with the Commissioner's preliminary conclusion that dumped goods from China have caused material injury to the Australian industry. The Commission has consequently made a preliminary affirmative determination and imposed securities while the investigation continues.

Impact on Australian manufacturing:

The most significant issue for us is what these market conditions mean for the future of our manufacturing operation.

We have already reduced staff.

We are also reluctant to commit further capital to better manufacturing machinery when we are uncertain whether Australian manufacturing can remain commercially viable against imported products being offered at the prices we are seeing.

If these conditions continue over the longer term, the realistic option for our business would be to restructure substantially, operate with a much smaller workforce and consider importing products ourselves rather than manufacturing them locally.

That would mean removing local aluminium window and door manufacturing from our business.

From a purely commercial perspective, importing may eventually become the rational decision for us. However, that is not the direction we want to take.
We want to manufacture in Australia.

Given a market where we can compete fairly, our intention would be the opposite. We would grow the business, employ more people, invest in better machinery and facilities and increase our local manufacturing capability.

For me, this is one of the most important issues in Investigation 691. Once manufacturing capability and skilled manufacturing jobs disappear, they are not necessarily easy to rebuild.

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These examples illustrate the commercial problem we are experiencing. At these sorts of price differences, it is extremely difficult for an Australian manufacturer employing local labour and maintaining Australian manufacturing facilities to compete.

In my view, Australia needs an effective and durable outcome from Investigation 691 that allows genuine competition while giving local manufacturers the opportunity to compete on fair terms.

I support AGWA's work in this investigation and support effective final measures where they are supported by the Commission's findings.

This is not about preventing competition or preventing imports. From our perspective, it is about having a market where investing in Australian manufacturing, machinery and people remains commercially worthwhile.

If that environment exists, Creative Windows will invest and grow.

If the current conditions continue, the risk is the opposite: fewer employees, less investment and ultimately the strong possibility that we stop manufacturing aluminium windows and doors locally and become an importer ourselves.
Yours sincerely,

Will Allen
General manager
Creative Windows

