26/10/2026

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

Dear Commissioner

I am writing on behalf of CVD Commercial Glass & Aluminium Windows Pty Ltd in response to the Statement of Essential Facts for Investigation 691.

CVD is an Australian manufacturer and installer of aluminium windows and doors based in Western Sydney. We operate our own fabrication facility in St Marys and have been part of the window and glass industry for more than two decades. Today our business has a strong focus on residential construction, from budget-conscious projects through to architecturally designed and high-end homes, but we also have a long history of manufacturing and supplying windows and doors for commercial and multi-residential projects.

We have participated directly in this investigation and provided the Commission with information about what we have experienced in the market. Having considered the Statement of Essential Facts, I support the Commission's preliminary finding that dumped imports from China have caused material injury to Australian industry. The SEF's broader findings on material injury and causation are consistent with the experience we previously put before the Commission.

Over recent years we have progressively shifted our business away from commercial and multi-residential work and placed greater emphasis on residential and higher-end projects. This was not because we lost the capability or desire to undertake commercial work. It reflected the increasing difficulty of competing commercially against fully imported aluminium window and door packages.

In our previous evidence, we advised that imported products were being offered at prices materially below Australian-manufactured equivalents. That price differential has contributed to CVD losing commercially viable tenders, reducing its participation in segments exposed to imported finished products and reconsidering where it commits estimating and business resources.

That experience matters because price competition does not only determine who wins an individual project. Over time, it influences where Australian manufacturers invest, who they employ, what equipment they purchase and even what parts of the market they are prepared to pursue and the commission has realised and presented in the SEF what many of us have known for some time about the fairness of the competition. Luckily its not too late with full consideration by the minster we can restore the level playing field.

Effective and durable Anti-Dumping measures would give businesses such as our's greater confidence to invest and compete, particularly in sectors where it has just become too hard due to the non-level playing field.
I also want to address the question of Australian industry's capability across different building classes.

Confidential Commercial Information Provided to the Commission

These projects are also relevant to the treatment of window wall in this investigation. AS 2047 defines window wall as a series of multi-light windows, and the SEF has treated window wall as remaining within the goods under consideration.

From a manufacturer's perspective, that makes sense. Window wall is not necessarily a separate product sitting apart from our normal manufacturing capability. It however is the installed outcome created by arranging and installing window products within the building façade.

I and indeed many window manufactures are not asking the Government to remove competition from our market. CVD competes every day, and we expect Australian manufacturers to compete on price, quality, service, innovation and capability. What we cannot sustainably do is compete against dumped finished product at price levels that fundamentally alter the commercial market.

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CVD manufactures in Western Sydney, uses Australian-based suppliers for all significant inputs, employs local people and takes responsibility for the performance and compliance of the products we put into Australian buildings. We believe businesses making those investments should have a fair opportunity to compete. CVD has previously highlighted compliance with NCC 2022, AS 2047 and AS 1288, together with engineering support, customisation, service and accountability, as areas in which locally manufactured products compete.

The Commission's preliminary findings provide some confidence that the experience businesses such as CVD have reported throughout this investigation has been recognised and I appreciate that we feel heard.

I therefore fully support the Commission maintaining its finding of material injury and proceeding with effective measures in its final recommendation.

For CVD, this is ultimately about restoring the confidence to compete across a broader part of the Australian market, invest in our manufacturing capability and give Australian-made products a fair opportunity to succeed.

Yours sincerely

Chris Van Dijk

Chris van Dijk
Managing Director
CVD Commercial Glass & Aluminium Windows Pty Ltd

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