DESIGN WINDOW SOLUTIONS PTY LTD
ATF Design Window Solutions Unit Trust
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29 October 2026

Australian Trade Remedies Commissioner
Australian Trade Remedies Commission
Canberra ACT

Re: Anti-Dumping Case 691 – Aluminium Windows and Doors from China
Submission in response to the Statement of Essential Facts

Dear Commissioner,

Design Window Solutions Pty Ltd supports effective and lasting measures to address the injury caused by dumped imports of aluminium windows and doors from China. Australian manufacturers need a fair opportunity to compete on price, and the findings in the Statement of Essential Facts (SEF) reflect what we have been experiencing in our own business.

We are a Victorian business that manufactures aluminium windows and doors locally and employs 24 people. Aluminium windows and doors are the core of our business, and our ability to continue manufacturing locally depends on being able to compete for work in the Australian market.

Over the past five years, we have progressively lost more work to Chinese imported products because of their lower prices. We are seeing price differences of approximately 30–40% compared with our pricing. This makes it increasingly difficult to win projects, even when customers have the option of using a local manufacturer.

The impact on our business has been significant. We have been forced to downsize and reduce our margins to the bare minimum to remain competitive. There are fewer customers willing to choose locally manufactured products when the price difference is so substantial. This puts pressure on our ability to maintain our business and the local employment that comes with it.

The SEF's findings on price undercutting and price suppression are consistent with our experience. In particular, the Commission's analysis of tenders found that half of the tenders reviewed were undercut by 30% or more (SEF, p. 190). This is consistent with the price differences we have encountered in the market. Our experience provides a practical example of how substantial price gaps can translate into lost work for Australian manufacturers.

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We are concerned about what this means for the future of local manufacturing if these conditions continue. Reducing margins and downsizing are not sustainable long-term solutions for a business that wants to retain its workforce and grow.

We believe effective measures would give Design Window Solutions a better opportunity to win work, protect existing customer relationships, grow the business and provide additional local employment. This is not about preventing legitimate competition or protecting Australian businesses from having to compete. It is about ensuring competition takes place on a fair basis and that Australian manufacturers are not continually disadvantaged by dumped imports.

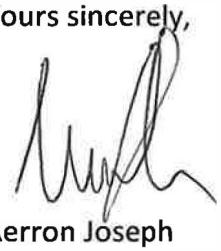
We support the Australian Glass and Window Association's work on this issue to the extent that it seeks effective measures supported by the evidence before the Commission. We encourage the Commissioner to consider the experience of independent Australian manufacturers alongside the broader industry data and to recommend meaningful measures that address the injury identified in the SEF.

CONFIDENTIAL INFORMATION PROVIDED TO THE COMMISSION

We believe a meaningful and durable outcome in Case 691 would help restore a fairer competitive environment for local manufacturers. We want to continue manufacturing in Victoria, retain our existing customers and employees, and have the confidence to grow our business and employ more people locally.

We ask the Commissioner to give due weight to the experience of businesses such as ours when making the final recommendation.

Yours sincerely,



Aerron Joseph

Director
Design Window Solutions Pty Ltd