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29 October 2026

Australian Trade Remedies Commissioner
Australian Trade Remedies Commission

RE: Anti-Dumping Case 691 – Aluminium Windows and Doors from China
Response to the Statement of Essential Facts dated 14 October 2026

Dear Commissioner,

I am writing to express my strong support for the findings outlined in the Statement of Essential Facts for Anti-Dumping Case 691 and the introduction of effective, ongoing anti-dumping duties on aluminium windows and doors imported from China.

As an Australian manufacturer, I believe it is essential that local businesses have the opportunity to compete on a level playing field. Based on what we are experiencing in our own business, the current situation is making it increasingly difficult for Australian manufacturers to remain competitive while maintaining a sustainable and profitable operation.

Our business manufactures aluminium windows and doors from our facility in St Marys, NSW. We employ approximately 40 people and manufacture products for residential, apartment and commercial projects throughout our market.

Over recent years, we have experienced increasing competition from aluminium windows and doors imported from China. We have lost projects directly to imported products, and we are also seeing property owners bypass Australian manufacturers and import windows and doors directly from China.

The pricing of these imported products is placing enormous pressure on our ability to compete at commercially sustainable margins.

Rising Costs and Pressure on Australian Manufacturing

Over the past two years, our business has experienced cost increases of more than XX% across our supply chain.

At the same time, we are competing against imported products at prices that make it extremely difficult to recover these increased costs.

We cannot continue absorbing substantial cost increases while being expected to compete with imported products at significantly lower prices.

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Our turnover has reduced by more than XX% over the past year as we continue fighting to remain competitive.

In my opinion, the volume of Chinese imported windows and doors entering our market has increased significantly, and this is having a direct impact on Australian manufacturers.

The findings in the Statement of Essential Facts regarding price undercutting and price suppression reflect what we are experiencing in our own business.

In particular, the Commissioner's findings concerning the inability of Australian manufacturers to recover rising costs are consistent with the commercial pressures we are facing.

We have experienced the loss of projects to Chinese imports, including a substantial residential project in Sydney. Further details are provided in the confidential section below.

Impact on Employment and Future Investment

The consequences of this competition extend well beyond individual projects.

Our ability to sell windows and doors at a profitable margin is essential to retaining quality staff, maintaining modern manufacturing machinery and continuing to invest in the growth of our business.

We employ approximately 40 people, and maintaining a strong, skilled workforce is important to our ongoing operations.

If we cannot achieve sustainable margins, it becomes increasingly difficult to justify continued investment in our manufacturing capability.

Australian manufacturers need to be able to compete fairly, recover their legitimate operating costs and generate sufficient returns to maintain and improve their businesses.

Australian Manufacturing Capability

I also want to emphasise that Australian manufacturers have the capability to produce aluminium window and door systems for substantial residential and commercial developments.

Our business has recently manufactured and supplied windows and doors for several significant Class 2–9 building projects, including projects involving window-wall-type products.

These projects demonstrate that Australian manufacturers have the technical capability, workforce and facilities to supply these building sectors.

We have provided examples of our completed projects in the confidential section below.

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The issue is not simply whether Australian manufacturers can produce these products. It is whether we can continue doing so commercially when competing against significantly cheaper imported products.

Product Quality

We have also had firsthand experience replacing defective Chinese glass with Australian glass on a Sydney residential property.

While I understand product quality and compliance are outside the scope of this anti-dumping investigation, these issues can create further difficulties for the local industry and undermine confidence in fair competition.

My primary concern in this submission remains the impact of imported pricing on Australian manufacturing.

Support for Effective Anti-Dumping Measures

I strongly support the introduction of effective and ongoing anti-dumping duties where supported by the Commissioner's findings.

In my view, meaningful and durable measures are necessary to give Australian manufacturers a fair opportunity to compete.

We are not asking for protection from normal competition. We are asking for the opportunity to compete on fair commercial terms, where Australian businesses can recover their costs, retain skilled employees, invest in modern manufacturing facilities and continue contributing to the Australian economy.

I support the Australian Glass and Window Association's efforts in this investigation and believe the experience of independent manufacturers such as ourselves reinforces the importance of an effective outcome.

CONFIDENTIAL COMMERCIAL INFORMATION PROVIDED TO THE COMMISSION

I believe the findings of the Statement of Essential Facts are consistent with the commercial pressures we are experiencing.

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Without effective measures, I am concerned that Australian manufacturers will continue losing opportunities to imported products, with further consequences for profitability, employment and investment.

I strongly encourage the Commissioner to recommend effective and durable anti-dumping measures that restore fair competition and support the future of Australian aluminium window and door manufacturing.

Yours sincerely,

Michael Brookes – Director

Evolution Window Systems

St Marys, NSW 2760

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