2nd November 2026

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

Re: Investigation No. 691: Aluminium Windows and Doors from China

Dear Commissioner,

I am writing on behalf of Jason Windows following the publication of the Statement of Essential Facts for Investigation 691.

Jason Windows has been manufacturing windows and doors in Western Australia for more than six decades and has grown to a team of more than 400 employees. We have invested in local manufacturing facilities, people, equipment and capability on the expectation that an Australian manufacturer that is productive, competitive and capable of meeting the needs of the market should have a genuine opportunity to win work.
It is from that perspective that we support the findings reached by the Commission in the Statement of Essential Facts.

For us, the significance of this investigation is best understood through what we are seeing in the market rather than through industry statistics alone.

During the investigation, we raised with the Commission the example of a significant residential development in Western Australia where we were advised that the window supply would be sourced entirely from China on the basis of price. We have deliberately not identified the development or its scale here because the information is commercially sensitive. We provided this example directly to the Commission during its engagement with Jason Windows.

That example matters to us because projects of this nature are exactly the type of work Australian manufacturers are equipped to undertake. We have the facilities, experience and workforce to manufacture substantial volumes locally. When work nevertheless moves offshore overwhelmingly because of price, it has a very real effect on the amount of work flowing through Australian factories.

One project does not define a market, and we would not suggest that it does. However, when experiences like this are considered alongside the broader evidence gathered by the Commission, the pattern identified in the SEF is recognisable to us. The consequences ultimately show up in factory throughput, utilisation of equipment, employment decisions and the willingness of businesses to commit further capital to Australian manufacturing.

This is particularly significant in Western Australia given the competition from the mining sector. Maintaining manufacturing capability here requires long-term investment. Machinery, facilities, skilled people, training and product development cannot simply be switched on and off as market conditions change. Once manufacturing capability and skills are lost, rebuilding them is difficult and expensive.

We also want to be clear that Jason Windows does not expect to win every project, nor do we believe Australian manufacturers should be insulated from overseas competition. Our concern is with the conditions under which that competition takes place. Australian manufacturers should be able to succeed or fail on the strength of their productivity, products, service and commercial offering, rather than face pricing distorted by dumping.

For that reason, we consider the Commission's work in Investigation 691 important. The SEF reflects circumstances that we recognise from our own experience in the Western Australian market and provides a basis for addressing those circumstances through Australia's established trade remedies framework.

Jason Windows therefore supports the Commission proceeding with appropriate measures where the requirements of the legislation are satisfied. In our view, an effective outcome would not remove competition from the Australian market. It would give Australian manufacturers the opportunity to compete for future work on a more sustainable commercial footing.

We appreciate the opportunity afforded to Jason Windows to participate in the investigation and the Commission's engagement with Australian manufacturers throughout the process.

Yours sincerely,

Brendan O'Reilly
Managing Director