THE JJD GROUP PTY LTD

YOU'RE SECURE

THE BLIND PEOPLE

CRYSTAL WINDOWS & DOORS

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2 November 2026

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

Dear Commissioner,

Re: Investigation 691 - Aluminium windows and doors

I am writing as the owner of Crystal Windows & Doors to support the findings of the Statement of Essential Facts in Investigation 691.

We have been manufacturing aluminium windows and doors in Queensland for more than 20 years. During that time, I have seen substantial changes in building design, energy efficiency, glazing, window systems and manufacturing technology. The range and complexity of products Australian manufacturers can supply have grown substantially.

Multi-level residential and commercial projects are our core business. Detached housing represents just 5% of our annual workload. Our experience includes apartments, offices and other commercial buildings, and we regularly manufacture products to meet the requirements of these projects.

We manufacture locally, employing local people and using locally extruded and powder-coated aluminium sections to produce high-quality windows and doors. We fabricate established Australian systems, including Vantage, Elevate and ThermalHEART. These are among several ranges designed and extruded in Australia and supplied to local fabricators like us.

One issue raised through this investigation is whether Australian manufacturers have the product range and capability to service different parts of the construction market. Our own experience demonstrates that we do.

Australian fabricators have access to a broad range of tested systems. We combine these with local manufacturing knowledge, glazing, engineering and solutions developed for individual projects to meet a wide range of building requirements. This is work we undertake every day.

Suggestions that Australian manufacturers lack the products required by the market, or do not service buildings beyond Class 1, do not reflect our experience.

I recognise that Australian manufacturers will always compete with imported products. That is part of operating in an open market, and I have no issue with it. We also compete strongly with other Australian manufacturers.

My concern is whether that competition takes place on fair terms.

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Australian businesses invest in manufacturing facilities, employ and train skilled people, meet Australian requirements and maintain the technical capability needed to supply an increasingly sophisticated construction market. We should have to compete hard and earn our work, but the outcome should not be distorted by dumped pricing.

For that reason, I consider the findings of the Statement of Essential Facts important. Appropriate measures would allow imported products to continue competing in Australia while addressing the effects of the dumping identified through the investigation.

Our recent projects demonstrate that Australian businesses can and do manufacture products for multi-level residential and commercial buildings, including window wall applications. I remain confident in that capability and believe it is worth maintaining through fair competition.

On that basis, I support the findings of the Statement of Essential Facts and appropriate measures to address the dumping identified by the Commission.

Yours sincerely,



Jim McIlmurray

Crystal Windows & Doors