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

Dear Commissioner

MCG Windows & Doors supports the findings contained in the Statement of Essential Facts for Investigation 691 concerning fully and partially fabricated aluminium windows and doors exported from China.

We are an Australian aluminium window and door fabricator based in Croydon South, Victoria. We employ approximately 50 people and manufacture custom aluminium windows and doors using predominantly locally sourced materials.

Our business is focused mainly on Melbourne's eastern and southern suburbs. We work directly with builders across a range of residential projects, from multi-residential developments through to large custom homes. Most of our work is supplied directly to builders on a project-by-project basis with a mixture of supply-only and installed. We do not operate as a retailer of standard, off-the-shelf windows. Each project must be quoted, detailed, manufactured and delivered to suit the requirements of the particular building. That gives us a direct view of what is happening at the point where Australian-made windows and doors compete with imported finished products.

Over recent years, we have seen a substantial increase in competition from very low-priced aluminium windows and doors manufactured in China and supplied directly into our customer base. In the market segments in which we operate, we regularly see competing prices approximately 30 to 40 per cent below Australian manufacturer-led offers, as found in the SEF.

That assessment is not based simply on general market commentary. It is supported by project schedules, quotations and pricing information that we have personally reviewed. MCG has retained supporting material and is prepared to make it available to the Commission if required, subject to suitable arrangements protecting customer confidentiality and commercially sensitive information. These price differences have had a direct effect on our business. We have lost projects where we could not commercially bridge the gap between the imported price and the cost of manufacturing the product in Australia. On other occasions, we have had to make decisions to accept work at or near our cost simply to maintain production through the factory and provide continuity of work for our employees. However, those decisions are not a sustainable foundation for an Australian manufacturing business. A manufacturer needs to earn sufficient margins to maintain its equipment, employ and train people, develop new products, and reinvest in the business. When work must continually be accepted at unsustainable prices, those longer-term activities are inevitably placed under pressure.

We have also reviewed imported product quotations that concern us. These have included proposed glass sizes and thicknesses that, in our experience, warrant closer scrutiny, as well as outer frame arrangements where it is unclear whether the relevant configuration has been tested to applicable Australian requirements. We do not suggest that every imported product is non-compliant, and we are not asking the Commission to make compliance findings on the basis of these observations. Our concern is that Australian manufacturers remain accountable for the products they fabricate and supply, while the same level of responsibility may not always be apparent when completed products are manufactured offshore and supplied directly into a project.

It is important to outline that our manufacturing capability is not limited to detached houses. MCG also fabricates and has supplied windows and doors for multi-residential and other Class 2–9 buildings. This includes projects containing arrangements of windows which, when installed within the building façade, form elements of window wall as described in AS 2047.

Recent examples of MCG's Class 2–9 work are provided in the confidential section below. They demonstrate that this is not a theoretical capability that the Australian industry would need to develop in the future. It is work being undertaken by Australian manufacturers today and that our industry had utilised long before imports from China were at the level they are now.

The findings in the Statement of Essential Facts concerning dumping, subsidisation, price undercutting, price suppression and material injury correspond with what we are experiencing in the market. From our perspective, the injury is not limited to the loss of an individual tender. It also occurs when an Australian manufacturer must substantially reduce its margin or take on work at close to cost to keep its factory operating and its people employed.

A fairer competitive environment would give MCG greater confidence to retain its employees, improve its manufacturing operations and invest in the next generation of people and productivity-enabling capital required by the Australian building market. It would also support the broader contribution our business makes to the local community, including our sponsorship of local sporting clubs and other community organisations.

We are concerned that, if current market conditions continue, otherwise capable Australian window businesses may progressively withdraw from parts of the market or close altogether. Once local manufacturing capability, skilled employees and established supply relationships are lost, economies of scale are weakened, and ultimately they are difficult and expensive to rebuild. A reduction in Australian manufacturing competition could also leave builders and consumers more dependent upon imported supply and with fewer competitive alternatives over the longer term.

MCG does not object to imports or seek to avoid normal commercial competition. We compete every day with other Australian manufacturers on price, service, quality, capability and delivery. What we support is a fair market in which local manufacturers have a reasonable opportunity to compete without being required to match prices found to have been affected by dumping or subsidisation.

For these reasons, MCG Windows & Doors supports the findings in the Statement of Essential Facts and the implementation of effective and durable measures supported by the evidence in Investigation 691. We also support the submission made by the Australian Glass and Window Association.

Thank you for considering MCG's experience.

Yours sincerely

Grant Milton

Grant Milton
Director
M.C.G Windows & Doors Pty Ltd