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Australian Trade Remedies Commissioner
Australian Trade Remedies Commission

Re: Anti-Dumping Case 691 – Aluminium Windows and Doors from China

Dear Commissioner,

We support the need for effective and durable measures that provide a fairer competitive environment for Australian aluminium window and door manufacturers. As a family-owned South Australian business that manufactures and fabricates locally, we believe Australian businesses should have a fair opportunity to compete on the quality of their products, service and reputation, rather than being disadvantaged by significantly cheaper imported products.

Our business operates throughout metropolitan South Australia, the Barossa Valley and the Yorke Peninsula. We manufacture and fabricate aluminium windows and doors using locally sourced aluminium extrusions, hardware and glass. We take pride in the quality of our work and the service we provide to our builders and customers.

We have seen increasing pressure from competitors who import finished or partially manufactured products at substantially lower costs than the locally sourced materials and products we use. This has negatively affected our ability to compete in tenders and win work, including work from builders with whom we have established relationships.

We are concerned that the cost advantage enjoyed by imported products makes it increasingly difficult for local manufacturers to compete fairly, even when we can offer the reputation, quality of service and local support that our customers value. We are aware of competitors winning work from some of our regular builders while using imported products at reduced prices.

The Statement of Essential Facts (SEF) for Case 691 identifies price undercutting in tenders and quotes as a significant issue. The Commissioner's analysis found that half of the tenders and quotes reviewed were undercut by 30% or more (SEF, p. 190). While we cannot attribute a specific price difference to an individual project, the findings are consistent with the competitive pressure we are experiencing in our own market.

As a local manufacturer, we need to cover the costs of locally sourced materials, fabrication, our workforce and running our business. When competing products are offered at substantially lower prices, it becomes harder to win work on the strength of our reputation and service. Over time, this affects our ability to grow and reinvest in our business.

For us, this issue is also about the future of our family business and the people we employ.

We want to be able to continue investing in our business and our workforce. A key part of our approach to staffing growth is employing apprentices from lower socio-economic areas in the northern suburbs of Adelaide. We see this as an important way to provide opportunities for people in our local community and develop the next generation of skilled workers.

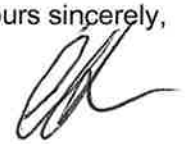
If we have a fairer opportunity to compete and win work based on our reputation and quality of service, we will be in a stronger position to reinvest financially in the business and in people. If current market pressures continue, those opportunities for growth and employment become more difficult to sustain.

We recognise that quality is important in our industry, and we have concerns about the quality of some imported materials compared with products we source locally. However, we understand that Case 691 is concerned with dumping and the resulting injury to Australian industry, rather than product compliance. Our primary concern in this submission is the price disadvantage we experience and its effect on our ability to compete for work.

We support effective measures arising from Case 691 that address the injury identified in the SEF and provide a meaningful and lasting improvement in competitive conditions for Australian manufacturers. We believe a fairer market would give local businesses like ours a better opportunity to secure work, maintain and grow employment, invest in our operations and continue contributing to the South Australian economy.

We support AGWA's work on this case and ask that our experience as an independent, locally manufacturing family business be considered as part of the Commissioner's assessment.

Yours sincerely,



Christopher Hanson
Director
Northern Suburbs Glass Service Pty Ltd