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

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

Dear Director,

Support for Statement of Essential Facts No. 691

I am writing on behalf of Novah Pty Ltd, an Australian manufacturer/fabricator of aluminum windows and doors operating in NSW.

We support the findings in Statement of Essential Facts No. 691 and the ongoing efforts of the Australian Glass and Window Association (AGWA) and the Australian industry applicants to achieve a fair and level playing field for Australian manufacturers.

In particular, we support the Commissioner's preliminary findings that aluminum windows and doors exported from China were dumped, that the Australian industry has suffered material injury as a result of dumped and subsidized imports, and that dumping and subsidization may continue.

As an Australian fabricator, we believe Australian manufacturers are capable of supplying aluminum windows and doors across a broad range of residential and commercial applications. We support the finding that the Australian industry is not confined to Class 1 buildings and supplies products across Class 1 to Class 9 buildings.

Our experience is that Australian manufacturers are prepared to compete on quality, service, compliance, capability and price. However, that competition needs to occur on fair terms.

In our own business, competition from imported aluminum windows and doors from China has affected us through lost projects, pressure to reduce prices, reduced margins, lower production volumes, reduced capacity utilization, impacts on investment or employment.

We therefore support the imposition of effective measures that address the injurious effects of dumping and subsidization and allow Australian manufacturers to compete on a fair and sustainable basis.

We also support AGWA continuing to represent the interests of Australian fabricators through the remainder of this investigation and in responding to the matters arising from the SEF.

This investigation is important to our business and to the future competitiveness of Australian window and door manufacturing. We encourage the Commission to ensure that the final measures provide a meaningful and durable level playing field for Australian industry.

Yours sincerely,

Director / authorized signatory: Nikhil Vohra

Signature: _____

NOVAH PTY LTD

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