SA Architectural Windows

2nd November 2026

Australian Trade Remedies Commissioner

RE: Anti-Dumping Case 691 – Submission in Response to the Statement of Essential Facts

Dear Commissioner,

I support the findings in the Statement of Essential Facts and the implementation of effective and durable measures that create a genuine level playing field for Australian manufacturers of aluminium windows and doors.

Our business manufactures and installs aluminium windows and doors from Direk, South Australia. We employ approximately 10 people, and aluminium windows and doors are the primary focus of our business. We manufacture using AWS systems and undertake a broad range of projects including residential, apartment, commercial and other building sectors.

The issues identified in the Statement of Essential Facts reflect what we have been experiencing in our business.

We regularly encounter customers advising us of significantly cheaper competing prices for imported aluminium windows and doors. Customers have presented imported quotations and requested that we match pricing levels that are simply not achievable for an Australian manufacturer producing locally and employing Australian workers.

This has placed considerable pressure on our margins and has made it increasingly difficult to recover substantial increases in labour, aluminium, glass, energy and other operating costs. While costs continue to rise, market conditions have limited our ability to adjust pricing accordingly.

We have also lost projects due to lower-priced imported products. In our experience, the issue is not simply strong competition. The pricing differences involved are often so significant that Australian manufacturers are unable to compete on anything approaching a sustainable basis.

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The findings in the Statement of Essential Facts regarding price undercutting, lost sales and pricing pressure align with our experience. We have seen imported products offered at prices substantially below what we can manufacture locally, resulting in ongoing pressure on pricing and profitability.

The impact extends well beyond individual projects. It affects business confidence, investment and employment decisions. We have delayed investment in equipment and business improvements, become more selective about the projects we pursue and experienced workforce impacts, including employee redundancies.

A fairer competitive environment would allow us to retain and grow our workforce, support future apprenticeships, invest in machinery and facilities, increase Australian manufacturing output and compete for projects with greater confidence. Most importantly, it would help ensure the ongoing viability of Australian manufacturing businesses like ours.

I support AGWA's submission in this matter. My experience as an independent Australian manufacturer is consistent with the concerns being raised on behalf of the wider industry.

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CONFIDENTIAL INFORMATION PROVIDED TO THE COMMISSION

Thank you for considering this submission.

Yours sincerely,



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Director

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