TAYLOR'S WINDOW SUPPLIES

Taylor's Window Supplies Pty Ltd
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Australian Trade Remedies Commission
Investigations 1
GPO Box 1632
Melbourne VIC 3001

Dear Commissioner

I am writing on behalf of Taylors Window Supplies Pty Ltd in support of the findings contained in the Statement of Essential Facts for Case 691 concerning fully and partially fabricated aluminium windows and doors from China.

Taylors Window Supplies Pty Ltd is an Australian manufacturer based in Queanbeyan, NSW. We design, manufacture, supply and install aluminium windows and doors across a broad range of residential, multi-residential and commercial construction. Our experience extends from detached and architectural homes through to Class 2 multi-residential developments and Class 3–9 projects across sectors including commercial, education, health, defence, aged care and retirement living.

Our business has developed the manufacturing, technical and installation capability required to service these different markets. We provide an integrated offering that includes shop drawings, engineering coordination, testing, fabrication, logistics and installation. We manufacture using established Australian window and door systems and Australian-processed glass, supported where necessary by independent engineering and project-specific technical solutions.

This breadth of experience gives us a clear view of the Australian market and how competitive conditions have changed over recent years.

We accept that imported products are an established part of the Australian market and that Australian manufacturers must compete for work. We do not seek protection from normal competition. Australian manufacturers should be expected to compete on price, efficiency, quality, technical capability, service and responsiveness.
However, that competition needs to occur on a fair basis.

In our experience, Chinese manufactured windows and doors increasingly compete directly with Australian manufactured products across the same building and project segments. Price has become an increasingly significant factor in purchasing decisions, particularly where imported and Australian manufactured products are being considered for the same project.

This is why the findings of the Statement of Essential Facts are important to Taylors Window Supplies Pty Ltd. Where the Commission determines that goods are being exported to Australia at dumped prices and that this is causing material injury to Australian industry, we believe it is appropriate that measures be applied to address that distortion.

Anti-dumping measures do not remove competition. Australian manufacturers will continue to compete with imports and with each other. Rather, the objective should be to ensure that efficient Australian manufacturers have a reasonable opportunity to compete in a market that is not distorted by dumping.
Australian capability across building classes

We also consider it important that the Commission has a clear understanding of the capability of the Australian industry.
Taylors Window Supplies Pty Ltd manufactures aluminium windows and doors for Class 1 detached housing, Class 2 low-, mid- and high-rise multi-residential construction and Class 3–9 commercial and institutional projects. Subject to curtain wall products, which are expressly excluded from the goods under consideration, our capability extends across the range of aluminium windows and doors covered by the investigation.

Our experience demonstrates that Australian manufacturing capability is not limited to Class 1 residential construction. Australian manufacturers such as Taylors Window Supplies Pty Ltd have the equipment, systems, supply chains, engineering support, skilled workforce and practical project experience required to manufacture and deliver products across these broader building classes.

Confidential Commercial Information Provided to the Commission

For us, this is ultimately about maintaining a competitive Australian manufacturing industry. Taylors is prepared to compete with imported products and with other Australian manufacturers, as we always have. But there needs to be a reasonable opportunity for an efficient Australian manufacturer, employing Australian people and investing in Australian manufacturing capability, to compete on fair commercial terms.

We therefore support the findings contained in the Statement of Essential Facts and the imposition of appropriate measures to address the dumping identified by the Commission and provide long-term confidence to our vibrant sector.

Yours sincerely,



Jason McLaren
General Manager
Taylors Window Supplies Pty Ltd