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Thursday, October 29, 2026

Australian Trade Remedies Commissioner

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

Re: Statement of Essential Facts – Case 691

I strongly support effective and lasting measures to address the impact of dumped aluminium windows and doors on Australian manufacturing. If we want manufacturing to continue in this country, Australian businesses need a fair opportunity to compete. Without that, we risk losing the skills, jobs and manufacturing capacity that are difficult to rebuild once they are gone.

Our business manufactures uPVC windows and doors in Wodonga, Victoria, and supplies and installs windows across Victoria, New South Wales and the ACT. We employ approximately 45 people, and windows and doors represent 100% of our business. We regularly compete against suppliers of aluminium windows and doors, including imported products. Since COVID, we have seen a huge increase in competition and a sharp reduction in the prices of imported aluminium windows and doors. This has fundamentally changed our ability to compete.

Before COVID, we were comfortably around 25% cheaper than imported aluminium products. Today, based on our experience and the prices we are competing against, we estimate that our products can be around 25% more expensive than the imported alternative. The change has been substantial.

We have lost a significant number of jobs, particularly in Canberra and Melbourne. We previously secured regular work with larger builders, including jobs worth more than $XXXXXX. Much of that work is now going to suppliers offering Chinese-imported, thermally broken aluminium windows and doors. At the prices we are seeing, matching those offers would mean running jobs at a loss. That is not a sustainable way to operate a manufacturing business.

The impact has also reached our workforce. In early 2026, we had to make one sales position redundant. Since then, we have experienced further staff attrition and have not replaced those positions. These are real decisions we have had to make in response to the market conditions we are facing.

The findings in the Statement of Essential Facts appear consistent with what we have experienced. On page 190, the Commissioner identifies significant price undercutting across a range of building classes. On page 18 and page 176, the SEF also addresses price suppression and the difficulty of recovering rising costs when competing prices remain under pressure. From our perspective, this is not just a question of competing with another Australian business. The price difference has changed to the point where we can no longer compete for some work without potentially losing money.

We have also started to see builders approaching us again about securing windows since the tariffs came in. Based on the opportunities we believe could return to our business if these measures continue, we estimate the potential annual revenue difference at more than $XXXXXX. This is an estimate of the opportunity we could regain, not a claim that this revenue has already been secured. It shows how important a fairer competitive environment could be for our business and our ability to retain and rebuild our workforce.

Further details supporting our experience with lost work and the potential business impact are provided in the confidential section below.

CONFIDENTIAL COMMERCIAL INFORMATION PROVIDED TO THE COMMISSION

If Australian manufacturing is to continue, it needs a fair chance to compete. Our experience shows how quickly that opportunity can disappear when the prices of imported finished products move so far below what a local manufacturer can sustainably offer.

I believe effective and lasting measures are important, not just for our business but for the future of manufacturing in this country. The issue also goes beyond windows and doors. Completed building products, including windows, kitchens and bathrooms, are examples of products where Australian manufacturers need a fair competitive environment if local production is to remain viable.

I support AGWA's efforts in this case and ask the Commissioner to give proper weight to the experience of independent Australian manufacturers when considering the final outcome. Measures need to be effective enough to address the injury identified in the SEF and provide a more sustainable basis for competition over the longer term.

Without that, I am concerned that Australian manufacturing businesses will continue to lose work, reduce employment and eventually disappear. Once that manufacturing capacity is lost, it will not be easy to get it back.

Yours sincerely,



Tye Spierings

Director
Ultimate Windows