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26 October 2026

The Commissioner
Australian Trade Remedies Commission - Investigations 1
GPO Box 1632, Melbourne VIC 3001

Investigation No. 691 - Aluminium windows and doors from China

Dear Commissioner,

I support the preliminary findings in Statement of Essential Facts No. 691 and the imposition of effective final measures against injurious dumping. Australian manufacturers should have to earn their work. They should not have to give up manufacturing to remain competitive.

Viewco Pty Ltd manufactures architectural aluminium windows and doors in Wagga Wagga, where we were established in 1995. We serve the Riverina, southern New South Wales and Canberra, combining local fabrication with technical advice, installation and service for residential and commercial projects.

We are not asking to be protected from efficient competitors. Higher performance, better installation and stronger service are not alternatives to competitive pricing. We have to deliver all of them, operate efficiently and deliver on time. That responsibility remains ours.

However, there is a difference between competing against a more efficient manufacturer and competing against a distorted material-cost base. The SEF preliminarily identifies government influence and distortions in Chinese aluminium and glass markets, and uses benchmarks in assessing relevant production costs (Appendix A, pp. 262 and 306-307; Appendix C, p. 316). I support that examination. Improving fabrication efficiency alone cannot resolve an unfair difference in the cost of the materials going into the product.

I also support action on the Commission's preliminary finding that dumped and subsidised imports caused material injury to Australian industry, including effects on prices and sales volumes (SEF, pp. 17-18).

At Viewco, the competitive pressure is influencing how I think about our future manufacturing model, sourcing and development of local capability. Supporting detail about our material-cost assessment and internal business planning is included in the confidential version of this letter.

I support the SEF's recognition that Australian manufacturers are not confined to Class 1 buildings and supply Class 2-9 projects (p. 15). Our industry's capability should not be judged solely by standard windows for detached houses. Examples of recent projects we won and manufactured, including window wall, are provided in the confidential version of this letter.

For me, the issue is bigger than whether an individual window business survives. A business can continue selling windows after it stops making them. Retaining an Australian brand, sales office and installation service is not the same as retaining Australian manufacturing.

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I support AGWA's work on this case and meaningful, durable measures that address the injury established by the investigation. A fairer market would give us greater confidence to keep developing Australian capability. It would not remove our obligation to improve.

We are prepared to compete on performance, workmanship, service, delivery and price. What we need is a fair opportunity to keep making the product here.

We currently employ 35 direct staff. And previously, before the impacts of Chinese AWD dumping, we employed more than 44 staff. Each Australian fabricator saved from unfair competition will have a huge multiplier effect to the Australian economy. We wish to continue this long into the future.

Yours sincerely,



Ryan Knight
Managing Director
Viewco Pty Ltd