

29 October 2026

The Commissioner Australian Trade Remedies Commission

Dear Commissioner,

Re: Response to Statement of Essential Facts – Anti-Dumping Case 691 Aluminium windows and doors exported from the People's Republic of China

I write to provide my response to the Statement of Essential Facts (SEF) for Anti-Dumping Case 691. I have operated my business for over 20 years, and at present I am genuinely struggling to keep our doors open. I employ a skilled and loyal team, most of whom have been with me from the beginning, and I want to continue contributing to Australian manufacturing. Without the imposition of a final duty on Chinese aluminium windows and doors, I believe our business will not survive. I support the findings in the SEF and respectfully request that a final duty be imposed so that Australian manufacturers can compete on a level playing field.

Who we are

Windows by Design is a Melbourne-based manufacturer of custom aluminium windows and doors for residential and commercial projects across Melbourne and surrounding regions. We fabricate all products in-house and undertake some installation work. Aluminium windows and doors are the entirety of our business. We currently employ 18 staff.

What we are experiencing

We are being severely undercut on pricing. Imported products are, in some cases, offered at around half the price of our locally manufactured products. Builders frequently tell us they can source windows and doors cheaper from China, and as a result we lose the job. This applies not only to apartment projects but also to our typical high-end and low-end residential work.

To remain competitive, we have been forced to cut our margins substantially — and in some recent cases, we have been quoting at cost. While part of this reflects broader economic conditions, a significant portion is directly attributable to pressure from Chinese pricing. Declining work volumes over recent years have also forced us to reduce staff numbers.

Alignment with the SEF

Our experience aligns closely with the Commission's findings:

- The Commission found widespread undercutting across building classes, including Class 2, with half of all quotes and tenders reviewed undercut by 30% or more (SEF p190). Being quoted at around half our price is consistent with this.
- The Commission found that persistent undercutting suppressed the industry's ability to recover rising costs (SEF p18, p176), and 92% of surveyed members reported margin compression (SEF p180). This reflects our own experience.
- Workforce impacts were reported by 33% of surveyed members (SEF p180). In our case, these impacts have been significant and have resulted in job losses.

What a level playing field would mean

We have no issue competing with imported products when competition is fair. What we cannot withstand is sustained dumped pricing from China. With a fair market, we could pursue work with confidence, stabilise our business, and begin rebuilding our workforce.

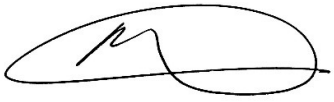
If current conditions continue, I do not believe manufacturers like us can survive.

CONFIDENTIAL COMMERICAL INFORMATION PROVIDED TO THE COMMISSION

Closing

I support AGWA's submission and respectfully ask the Commissioner to impose an effective and durable final duty. We are only seeking a level playing field. With fair conditions, we can retain our staff, sustain our business, and compete on equal terms.

Yours sincerely,



Matt Watkins - **Director**
Windows by Design