AUSTRALIAN
ALUMINIUM
COUNCIL LTD

28 October 2026
Director
Investigations 1
Australian Trade Remedies Commission
GPO Box 2013
Canberra ACT 2601
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Dear Director,

**Non-Confidential**

*Investigation No. 691 – Aluminium windows & doors from China*
*Industry submission in support of the Statement of Essential Facts*

## 1. Introduction

The Australian Aluminium Council (the Council) makes this submission to Investigation 691 (INV 691) concerning aluminium windows and doors (AWDs) exported to Australia from the People's Republic of China (China), in response to Statement of Essential Facts No. 691 (SEF 691), published on 14 October 2026[1].

The Council is the peak industry association representing Australia's integrated bauxite, alumina and aluminium industry. The Council provides a unified voice across the value chain, working with governments, industry and communities to support a resilient, competitive and sustainable sector that underpins Australia's economic strength, industrial capability and energy transition. The Council's extrusion members represent more than 99% of the aluminium extrusion volume produced in Australia.

The Council supports the findings in SEF 691, the preliminary affirmative determination and the taking of securities from 15 October 2026.[2]

## 2. Supportive observations on SEF 691

Having reviewed SEF 691, the Council supports the Commissioner's preliminary findings, in particular that:

- window wall is within the goods, and the Australian industry supplies AWDs across Class 1 to Class 9 buildings and has available capacity to do so;[3]
- a particular market situation existed in China for AWDs, arising from the influence of the Government of China over the Chinese aluminium and glass markets;[4]
- every selected exporter other than Altop Facade Co., Ltd exported the goods at dumped prices;[5]
- the Australian industry has suffered material injury caused by dumped and subsidised imports;[6] and
- dumping and subsidisation may continue.[7]

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[1] EPR 691, document no. 501.
[2] SEF 691, sections 1.2, 1.2.1 and 13.3, pp. 10–12 and 216–217.
[3] Ibid, section 4.6.1, pp. 89–94; section 4.7.3, pp. 100–101.
[4] Ibid, section 6.4, pp. 132–134.
[5] Ibid, section 6.1, Table 12, p. 129.
[6] Ibid, section 8.1, p. 168; chapter 9.
[7] Ibid, section 10.2, p. 205.

Aluminium extrusions are the largest input to AWDs. Our Members experience the effect of dumped AWD imports directly. Each project lost by a fabricator to dumped imports is also lost extrusion volume for our industry. While the Council recognises the need for downstream manufacturers to have diversity of supply and that Australian industry maintaining its competitiveness is a key element of this. The Council supports this diversity of supply, provided it is at fair prices. If finished goods are imported below the cost of production, and that would be contrary to Australia's national interests.

**3. Matters of concern**

Based on our review of SEF 691, the Council has concerns with certain of the preliminary outcomes, being:

- the claims by interested parties that the injury suffered by the Australian industry is attributable to its own input costs, including the price of Australian aluminium extrusions, rather than to dumped imports;
- the six exemption requests, which the Commissioner has not yet considered;
- the construction of the aluminium extrusion benchmark, and the consistency with which the Commission has assessed whether exporters' aluminium costs were affected;
- the aluminium subsidy findings, including whether the extrusions purchased by the selected exporters were sourced from state-invested Chinese producers; and
- the proposed ad valorem form of interim dumping duty, the administrative practicalities of how the measures will operate in future accelerated reviews, and therefore the efficacy of the measures.

To comprehensively reflect the position of the Australian aluminium extrusion industry, the Council understands that Capral Limited (Capral), as the largest manufacturer and distributor of aluminium extrusions, will address SEF 691 via submission response. The Council and its Members support Capral's detailed representations on these matters, and requests that the Commission have regard to them in preparing the final report.

**4. Conclusion**

The Council supports the findings in SEF 691 and the publication of dumping and countervailing duty notices on AWDs exported to Australia from China. We request that the final report address the matters identified in Section 3 above, having regard to Capral's submission.

The Council will continue to work to provide the Anti Dumping Commission with accurate submissions to ensure the 75,000 Australians which are directly and indirectly employed across the industry can operate on a level playing field with imports, no matter where they operate in the value chain.

If you have any questions regarding this submission, please do not hesitate to contact me.

Kind regards,



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