PUBLIC / NON-CONFIDENTIAL

ANTI-DUMPING COMMISSION

Investigation No. 691

Aluminium Windows and Doors Exported from the People's Republic of China

FURTHER SUBMISSION BY

ECOECO WINDOWS & DOORS PTY LTD

Response to EPR 450 - Industry Support for Joint Application

Industry Standing, Production Methodology and Representativeness

EPR 450 states 55%. It does not demonstrate 55%.

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19 August 2026

1. Purpose of this submission

EcoEco Windows & Doors Pty Ltd makes this further submission in response to EPR 450 - Note for File: Industry Support for Joint Application.

EPR 450 was published following submissions questioning whether the application lodged by Ventora Group Pty Ltd ("Ventora") and the Australian Glass and Window Association ("AGWA") was supported by a sufficient part of the Australian industry.

EPR 450 states that:

> “The total production volume reported by the members listed below and the applicant Ventora represents 55% of the total estimated production volume of like goods.”

It identifies 21 publicly named supporting Australian industry members while also noting that entities claiming confidentiality have not been included in the published list. (Source 1)

EcoEco submits that EPR 450 does not resolve the substantive issue.

It provides a conclusion: 55%. It does not provide sufficient non-confidential information to demonstrate how that result was derived.

EPR 450 states 55%. It does not demonstrate 55%.

2. The statutory test is production, not a list of company names

Section 269TB(6) of the Customs Act 1901 establishes a production-based test for whether an application is supported by a sufficient part of the Australian industry. (Source 4)

The statutory test is therefore based on production or manufacture of like goods. It is not a headcount.

21 company names are not the calculation. Production of like goods is the calculation.

The relevant question is: what qualifying production did those supporters actually manufacture, and what was the total Australian production against which that production was measured?

EPR 450 does not enable that calculation to be reproduced.

3. EPR 450 does not answer the substance of the industry-standing challenge

The challenge raised in earlier submissions was not simply: who supported the application? It concerned whether sufficient industry standing existed, what production was represented by supporters, how the Australian industry had been identified, how total Australian production had been established, and whether the public record contained sufficient information to allow meaningful scrutiny of the calculation. (Sources 2-3)

EPR 450 answers one question more fully by identifying 21 publicly named supporters. It does not adequately answer the central question: how did their qualifying production produce the statutory result?

Naming supporters is not evidence of their production share. Stating 55% is not the same as demonstrating the calculation which produces 55%.

4. The published supporter population remains unclear

EPR 450 identifies 21 supporting Australian industry members. Its own footnote also states that entities claiming confidentiality have not been included in the published list. (Source 1)

At the same time, EPR 450 states that the total production volume reported by the members listed below and the applicant Ventora represents 55%.

That leaves an important ambiguity: does the stated 55% comprise Ventora plus the 21 publicly identified supporters only, or does it also include production attributed to supporters whose identities have been withheld?

EcoEco does not seek disclosure of confidential identities. It asks the Commission to clarify whether additional confidential supporters form part of the 55% and, if so, how many additional supporting producers are included.

Without that information, even the population forming the numerator is unclear.

5. Actual production must be distinguished from capability to manufacture

Earlier Commission material referred to manufacturers or producers Ventora considered “could manufacture like goods”. (Sources 2-3)

The statutory question is different. The relevant test concerns persons who actually produce or manufacture like goods in Australia. (Source 4)

Capability is not production. Installed capacity is not production. Potential production is not production.

The relevant figure is qualifying like goods actually produced or manufactured during the period used for the standing assessment. EcoEco therefore submits that the public record should establish, at least on an aggregate basis, that every quantity entering the numerator represented actual qualifying Australian production.

6. The whole supporter list must be examined, not merely counted

Publication of the 21 supporter identities provides useful information about the composition of the supporting group.

The purpose of the following analysis is not to suggest that these companies are not separate legal entities, nor that genuine production independently undertaken by any supporter should be excluded.

The publicly available evidence shows that a substantial proportion of the 21 supporters operate within identifiable proprietary system, licensing, fabrication or supply networks. That matters to production attribution, possible duplication controls, and the representativeness of the supporter population.

6.1 Bradnam’s system

Bradnam's Windows and Doors Pty Ltd

Australian window and door manufacturer and proprietary system owner operating its own manufacturing and an independent licensed-fabricator network.

(Sources 1, 7)

Clark Windows Tasmania Pty Ltd

Bradnam's identifies Clark Windows as an independently owned licensed fabricator authorised to manufacture and sell Bradnam's products.

(Sources 1, 7)

MCG Windows & Doors Pty Ltd

Bradnam's identifies MCG as an independently owned licensed Bradnam's fabricator.

(Sources 1, 7)

Vivid Glass Windows and Doors Pty Ltd

Bradnam's identifies Vivid as an independently owned licensed Bradnam's fabricator.

(Sources 1, 7)

What this shows: four of the 21 publicly identified supporters operate within the Bradnam's proprietary system family. They remain separate businesses, but they do not represent four unrelated proprietary systems or four wholly independent manufacturing architectures.

6.2 AWS systems

Evolution Window Systems Pty Ltd

AWS identifies Evolution as a manufacturer/fabricator offering AWS system products, including the Vantage range.

(Sources 1, 8)

Hanlon Windows (Aust) Pty Ltd

Publicly identified within the AWS supplier/manufacturer network.

(Sources 1, 8)

Nu-look Windows (W Loftus & Co Pty Ltd)

AWS supplier/manufacturer whose public AWS profile identifies locally manufactured window and door products.

(Sources 1, 8)

Taberners Windows & Doors Orange Pty Ltd

Publicly identified by AWS as a fabricator of AWS systems.

(Sources 1, 8)

Taylors Windows Supplies Pty Ltd

Publicly identified through AWS project and supplier material as a manufacturer/fabricator using AWS systems.

(Sources 1, 8)

What this shows: five of the 21 publicly identified supporters operate within the AWS system network. They may be legally and commercially independent, but they do not represent five unrelated proprietary systems or five fundamentally different manufacturing architectures.

6.3 Capral relationships

LGA (WA) Pty Ltd

Public Capral material identifies LGA as a fabricator of Capral window and door systems.

(Sources 1, 9)

PCW Commercial Windows Pty Ltd

A long-standing Capral fabricator. Capral states that PCW manufactures window, door and framing systems designed, tested and extruded by Capral.

(Sources 1, 9)

GP Glass Pty Ltd

GP Glass publicly identifies Capral among its suppliers, while Capral separately identifies GP Glass as a fabricator of Capral systems.

(Sources 1, 9, 16)

Magic Glass Pty Ltd

Capral identifies Magic Glass as a fabricator of Capral systems. Magic Glass also appears within the Alspec system network.

(Sources 1, 9-10)

This overlap is itself important because it shows why the supporter list cannot simply be divided into neat, mutually exclusive groups.

6.4 Alspec / Carinya relationships

Glass Co. (Metro) Pty Ltd

Alspec project material identifies Glass Co Metro as a fabricator of Carinya and other Alspec systems.

(Sources 1, 10)

Glass Co. WA Pty Ltd

Public material identifies the business as an Alspec/Carinya regional dealer manufacturing Carinya/Alspec window and door systems.

(Sources 1, 10)

Magic Glass Pty Ltd

Also publicly identified as a fabricator of Alspec systems.

(Sources 1, 9-10)

Coastal Windows & Doors Pty Ltd

Public material confirms Australian manufacture and use of Carinya product ranges. EcoEco does not rely upon an exclusive system classification for Coastal.

(Sources 1, 13)

The important point is that multiple named supporters participate in the same broader proprietary-system supply environment.

6.5 Ventora / A&L relationship

Aliview Group Pty Ltd

Aliview expressly identifies itself as an A&L Windows licensee and states that it manufactures products on site. A&L is a Ventora brand.

(Sources 1, 11-12)

Ventora → A&L Windows → Aliview Group

This is directly relevant to production attribution because Ventora is itself the principal applicant while Aliview appears separately as a supporting producer. It does not establish duplication. It establishes a relationship that requires production to have been attributed carefully.

6.6 Other substantial Australian manufacturers

Dowell Windows Pty Ltd

Long-established Australian manufacturer with its own product ranges and manufacturing facilities. G.James also directs Western Australian residential enquiries for certain G.James products to Dowell.

(Sources 1, 14-15)

G.James Glass and Aluminium (QLD) Pty Ltd

Australian manufacturer and proprietary system owner. G.James also operates licensed-manufacturer relationships.

(Sources 1, 15)

Jason Windows Pty Ltd

Australian manufacturer whose public material records local window and door manufacture at its Welshpool facility.

(Sources 1, 17)

Rylock Pty Ltd

Australian manufacturer designing products internally and manufacturing aluminium windows and doors at Australian facilities.

(Sources 1, 18)

These businesses more clearly represent substantial direct manufacturing operations rather than merely independent licensed fabrication.

7. What the 21 names actually show

The supporter population can therefore be understood more clearly as a series of overlapping system and manufacturing relationships rather than as 21 unrelated industry interests.

- Bradnam's network: 4 named supporters.
- AWS network: 5 named supporters.
- Capral relationships: multiple named supporters.
- Alspec relationships: multiple named supporters, with overlap.
- Ventora/A&L: Ventora plus the separate Aliview licensing relationship.
- Other substantial manufacturers: including Dowell, G.James, Jason and Rylock.

These groups are not mutually exclusive and should not simply be added together. That is precisely the point.

The 21 publicly identified legal entities do not represent 21 unrelated proprietary systems, 21 independent manufacturing architectures or 21 entirely separate commercial perspectives.

This observation does not diminish genuine production undertaken by any supporter. It changes what can properly be inferred from the apparent numerical breadth of the supporter list.

The Commission should distinguish between the number of legal entities, the number of genuinely different manufacturing systems, the number of different commercial and supply-chain models, and actual qualifying production. Those are not the same thing.

8. The system relationships create a specific production-control issue

Consider a simple example. A proprietary system owner physically manufactures 30,000 m² of qualifying windows itself. An independently owned licensed fabricator manufactures 10,000 m² using that system.

If each reports only its own physical production, total production is 40,000 m² and there is no duplication.

But if the system owner reports system-wide production of 40,000 m², including its licensee's output, while the licensed fabricator separately reports its 10,000 m², apparent production becomes 50,000 m² although only 40,000 m² was physically produced.

EcoEco is not alleging that the Commission double counted production.

The published supporter relationships demonstrate a real production-attribution risk which the Commission must have excluded. EPR 450 does not explain how it did so.

The question is straightforward: was each supporter credited only with qualifying production physically attributable to that producer and not with production separately reported by another producer within the same system network?

9. Production passing through successive manufacturing stages requires the same control

Investigation 691 includes both fully assembled and certain partially assembled aluminium window and door goods. (Source 3)

A physical product can therefore potentially pass through more than one manufacturing stage. If one Australian producer manufactures an in-scope frame, panel or sash assembly and another subsequently completes the same physical window, a consistent methodology is required to ensure the same underlying production is not counted more than once.

One physical quantity of production must enter the calculation once, and only once.

10. The denominator is at least as important as the numerator

EPR 450 describes its denominator as the “total estimated production volume of like goods”. (Source 1)

The word estimated is important. If supporting production were 55 units and total Australian production were estimated at 100 units, support would be 55%. If qualifying Australian production omitted from the estimate increased the actual denominator to 130 units, the same supporting production would represent approximately 42.3%.

The numerator has not changed. The denominator has changed the result.

The central question is therefore: how did the Commission identify the Australian industry from which “total estimated production” was calculated?

- How many Australian producers formed the denominator?
- How many supplied actual production data?
- How much production was estimated?
- How was that estimated production calculated?
- Were non-AGWA producers included?
- Were neutral producers included?
- Were opposing producers included?
- What steps were taken to locate producers not identified by the applicants?

These are not peripheral matters. They determine the percentage.

11. Independent evidence already on the Commission’s public record makes the denominator question more important

An independent June 2020 IBISWorld report titled Aluminium Door and Window Manufacturing in Australia is already hosted on the Anti-Dumping Commission’s public record as an attachment in Case 540. (Sources 5-6)

The report described the Australian aluminium window and door manufacturing industry as large, fragmented and low in concentration. For 2019-20 it identified approximately $4.157 billion in industry revenue, 1,527 establishments, 1,455 enterprises and approximately 15,609 employees. It also reported that the four largest participants together accounted for less than 15% of industry revenue and that more than 90% of firms were either non-employing or employed fewer than 20 people. The only company identified as a major player was JELD-WEN Australia, with an estimated 7.4% revenue share. (Source 6)

EcoEco does not suggest that these figures mathematically disprove the Commission's 55%. They do not. IBIS measured revenue rather than the statutory production-volume test; its industry definition is not necessarily identical to the goods definition in Investigation 691; and the report predates the present investigation.

Its relevance is nevertheless substantial: independent evidence already on the Commission's public record describes this industry as historically fragmented and low in concentration.

Against that background, a conclusion that Ventora and a relatively small number of supporting manufacturers account for 55% of total estimated qualifying Australian production requires an intelligible explanation.

There may be a valid explanation. But the explanation is part of the calculation.

12. EPR 450 reinforces EcoEco's previously raised concern about structural sample bias

EcoEco has already raised this concern in earlier submissions, and I also raised it directly in my meeting with the Commission.

The problem is not simply sample size. The problem is sample composition.

The Australian window industry contains materially different methods of bringing a finished window to the customer. At one end are vertically integrated or substantially integrated manufacturers carrying multiple stages internally. That model can require substantial:

- extrusion inventory;
- component inventory;
- glass inventory;
- work in progress;
- finished-window inventory;
- production machinery;
- factory space;
- manufacturing labour;
- handling;
- working capital; and
- fixed overhead.

At another end are businesses operating through specialised system suppliers, independent fabricators, outsourced processes, lean supply chains and imported finished or substantially finished products.

Both may ultimately supply the same functional outcome: a compliant window installed in an Australian building. But their economic structures are fundamentally different.

A multi-stage manufacturing structure can multiply the amount of plant, inventory and working capital required before the finished product reaches the customer. That does not automatically mean it is economically superior.

More assets do not necessarily mean greater productivity. More inventory does not necessarily mean greater efficiency. More manufacturing stages do not necessarily mean greater value creation. Those things can simply represent the cost of the chosen production architecture.

13. The whole supporter list strengthens that sample-bias concern

The full supporter analysis makes this concern more important. The supporter population is heavily represented by businesses involved directly in conventional Australian finished-window fabrication. Several operate within the same proprietary system networks. Several are independent fabricators using systems designed, tested or supplied by common system owners. Others are vertically integrated manufacturers and proprietary system owners themselves.

This does not mean their production is invalid. It does mean that the supporter population should not automatically be treated as representing every materially different manufacturing and supply-chain architecture operating in Australia.

A large sample can still be a structurally biased sample. Increasing the size of a structurally skewed sample does not remove the skew. It reinforces it.

14. The investigation must not mistake the economics of one production model for injury caused by imports

A vertically integrated, inventory-heavy manufacturing structure naturally has greater exposure to capacity utilisation, fixed manufacturing overhead, inventory carrying costs, working capital, plant utilisation, labour utilisation and return on invested manufacturing assets.

When demand falls or production shifts, those indicators may deteriorate sharply. But that does not establish why they deteriorated. Nor does it establish that dumped imports caused the deterioration.

The investigation must distinguish between injury caused by dumped imports and economic consequences arising from the structure, efficiency and asset intensity of the domestic production model itself.

If a high-cost or asset-heavy production architecture generates weak utilisation, inventory or return indicators, and those indicators are characterised as injury and then attributed to imported competition without separately examining the structural cause, the analysis risks becoming circular.

The investigation must not mistake the cost of an inefficient production architecture for injury caused by imports.

That is a causation issue.

15. Production volume is not the same thing as economic representativeness

A large producer may properly carry substantial weight in a statutory production-standing calculation. That does not mean its production architecture should automatically become the benchmark against which the economic health of the whole Australian industry is measured.

Statutory production standing

Do the supporting producers satisfy section 269TB(6)?

Economic representativeness

Does the domestic industry population relied upon for injury and causation fairly represent the materially different production and supply-chain structures operating in Australia?

A production-weighted majority can satisfy the first test while remaining structurally skewed for the second. The distinction matters.

16. The supporter list was not the result of an informed industry-wide process

I and many others in the Australian window and door industry were not informed by AGWA, before the application was lodged, that AGWA and Ventora intended to seek anti-dumping and countervailing measures on aluminium windows and doors imported from China.

I first became aware of the action after Investigation 691 was announced by the Anti-Dumping Commission.

EcoEco is an established Australian window business directly affected by the proposed measures. Yet I was not asked whether EcoEco supported the application. I was not asked whether EcoEco opposed it. I was not provided with the allegations and asked for a view. And I know I was not alone.

EcoEco makes a narrow but important point: the published supporter list must not be confused with informed industry-wide consensus.

A group of producers satisfying a statutory production threshold is one proposition. An Australian industry broadly informed of a proposed action and expressing support for it is a different proposition.

The Commission may establish a statutory production threshold. That does not establish industry consensus.

17. Limited pre-lodgement awareness reinforces the sample-composition concern

This issue becomes particularly important when considered alongside the supporter mapping. If businesses approached before lodgement were concentrated amongst conventional fabricators, proprietary system networks and vertically integrated manufacturers, while other materially different supply-chain models were unaware that the application was being prepared, the resulting supporter population would naturally reflect one part of the industry more strongly than others.

That does not invalidate the views of those supporters. It does mean those views should not automatically be characterised as representing every materially different commercial model operating within the Australian window industry.

1. Production standing

Did the supporters satisfy the statutory production test?

2. Breadth of support

How diverse are the independent manufacturing systems, commercial structures and industry perspectives represented by the supporter group?

3. Economic representativeness

Does the population relied upon for injury and causation fairly represent the materially different manufacturing and supply-chain architectures operating across Australia?

55% cannot answer all three questions.

18. Questions EPR 450 leaves unanswered

1. Does the stated 55% comprise Ventora and the 21 publicly identified supporters only, or does it also contain production attributed to confidential supporters?
2. If confidential supporters are included, how many additional supporting producers are there?
3. What period was used for the production calculation?
4. What common unit was used to measure production?
5. Did every supporter included in the numerator actually produce qualifying like goods during the relevant period?
6. How many Australian producers formed the denominator described as “total estimated production volume of like goods”?
7. How many supplied actual production data?
8. What proportion of the denominator was estimated?
9. What methodology was used to calculate those estimates?
10. Were producers outside AGWA membership included?
11. Were neutral Australian producers included?
12. Were opposing Australian producers included?
13. Was production attributed to each supporter restricted to production physically manufactured by that entity?
14. Where a system owner operated through independent licensed fabricators, did its reported production exclude output manufactured independently by those fabricators?
15. Specifically, was Bradnam's own production kept separate from the production of Clark Windows Tasmania, MCG Windows & Doors and Vivid Glass Windows and Doors?
16. Was Aliview’s production kept separate from production attributed to Ventora or A&L?
17. Did any production figure attributed to Ventora include output independently manufactured by A&L licensees?
18. Where the same physical goods passed through successive Australian manufacturing stages, what methodology prevented those goods from being counted more than once?
19. How many Australian producers were contacted or otherwise identified before the application was lodged?
20. How many expressed support, opposition or no view before initiation?
21. What steps were taken to identify producers operating outside the proprietary system and manufacturing networks represented among the publicly named supporters?
22. Can the Commission provide an aggregate, indexed or ranged reconciliation demonstrating qualifying supporting production ÷ total estimated Australian production = 55%?

None of these questions requires disclosure of an individual competitor’s confidential production volume. The Commission’s information policy recognises that confidential information may be presented in aggregate, indexed or otherwise non-confidential form where appropriate. (Source 19)

19. EcoEco’s position

EcoEco does not allege that the Commission deliberately double counted production.

EcoEco does not assert that the 55% figure has already been proved wrong.

EcoEco does not suggest that every Australian manufacturer was legally required to be consulted before the application could be lodged.

Those propositions are unnecessary. EcoEco’s position is simpler.

EPR 450 has not demonstrated the proposition it asserts.

It gives the public 21 names, an undisclosed number of confidential supporters, and 55%.

It does not provide sufficient information to reconstruct the numerator. It does not provide sufficient information to reconstruct the denominator. It does not explain the treatment of overlapping system-owner and licensed-fabricator production. It does not explain how production duplication was excluded.

The whole supporter list also demonstrates substantial clustering within common proprietary system, fabrication and supply networks. That does not reduce legitimate production. But it does mean that 21 named legal entities should not automatically be treated as 21 independent manufacturing architectures or 21 independent commercial perspectives.

It also reinforces EcoEco's existing concern that the industry population being examined may be structurally weighted towards the most asset-intensive, inventory-intensive and multi-stage method of manufacturing windows.

Nor should the supporter list be presented as evidence of an informed Australian industry consensus when I and many others were not informed before the application was lodged.

20. Requested action

EcoEco submits that EPR 450, in its present form, does not adequately resolve the industry-standing issue which prompted its publication.

EcoEco asks the Commission to publish sufficient non-confidential information, either by further file note or in the Statement of Essential Facts, to demonstrate:

- the supporting-production numerator;
- the total-Australian-production denominator;
- the methodology used to estimate the denominator;
- the number of Australian producers represented in that denominator;
- the treatment of system-owner and independent-fabricator production;
- the treatment of production passing through successive manufacturing stages; and
- the controls used to ensure that physical production was counted once.

EcoEco further asks the Commission to distinguish expressly between statutory production standing, the number of named legal entities, the number and diversity of independent proprietary systems and commercial interests represented, informed industry consensus, and economic representativeness for injury and causation purposes.

These are different propositions. They should not be conflated.

21. Conclusion

EPR 450 answers: who are some of the businesses that supported the application?

Publication of the whole supporter list now provides a further insight. A substantial proportion of those businesses operate within identifiable proprietary system, licensing, fabrication and supply relationships.

- four named supporters within the Bradnam's system family;
- five named supporters within the AWS network;
- multiple Capral-system fabricators;

- multiple Alspec-system fabricators;
- an identifiable Ventora/A&L/Aliview licensing relationship; and
- several substantial vertically integrated Australian manufacturers.

Some of these relationships overlap. That does not invalidate production genuinely undertaken by any supporter. It makes the production methodology more important, not less.

EPR 450 still does not adequately answer how their qualifying production equals 55% of total Australian production. Nor does 55% establish that the supporting population represents the materially different economic and manufacturing structures operating throughout the Australian window industry.

EcoEco has previously raised its concern that the investigation risks disproportionately measuring an asset-heavy, inventory-heavy and multi-stage model of Australian window production. The supporter identities disclosed in EPR 450 strengthen that concern.

I and many others were not informed before the application was lodged.

The questions are therefore: what production was counted? Who was included in total Australian production? Was every unit counted once? What does the supporter population actually represent? Is the industry population structurally representative?

SHOW THE CALCULATION.

Edward Stelling
CEO
EcoEco Windows & Doors Pty Ltd
19 August 2026

Sources relied upon

Official Commission and legislative material is listed first, followed by public company/system sources used only to identify the commercial and manufacturing relationships described in section 6.

1. Investigation 691 - EPR 450 - Note for File: Industry Support for Joint Application, 10 August 2026. EPR 450

2. Investigation 691 - EPR 423 - CCCMC submission, 17 February 2026. EPR 423

3. Investigation 691 - Electronic Public Record and Consideration Report No. 691. Case 691 EPR

4. Customs Act 1901 (Cth), section 269TB(6). Customs Act 1901

5. Case 540 - Electronic Public Record. Case 540 EPR

6. IBISWorld, Aluminium Door and Window Manufacturing in Australia, June 2020 - Attachment 2 on the Commission public record in Case 540. IBISWorld report

7. Bradnam's licensed fabricator evidence - Clark Windows Tasmania, MCG Windows & Doors and Vivid Glass Windows and Doors. Clark | MCG | Vivid

8. Architectural Window Systems (AWS) supplier/fabricator evidence - Evolution, Hanlon, Nu-Look, Taberners and Taylors. Evolution | Hanlon | Nu-Look | Taberners | Taylors

9. Capral fabricator evidence - GP Glass, LGA (WA), PCW Commercial Windows and Magic Glass. GP Glass | LGA | PCW | Magic Glass

10. Alspec / Carinya fabricator evidence - Glass Co Metro, Glass Co WA and Magic Glass. Glass Co Metro | Glass Co WA | Magic Glass

11. Aliview Group - identifies itself as a licensee of A&L Windows Pty Ltd and states that it manufactures on site. Aliview Group

12. Ventora - identifies A&L and Trend among its continuing brands. Ventora

13. Coastal Windows & Doors - public information on local manufacture and Carinya product ranges. Coastal Windows & Doors

14. Dowell Windows - Australian manufacturing history and current manufacturing operations. Dowell Windows

15. G.James - public contact/product material identifying regional residential product relationships, including Dowell in Western Australia. G.James

16. GP Glass - identifies Trend Windows & Doors and Capral Aluminium among suppliers and states that products are manufactured locally. GP Glass

17. Jason Windows - local manufacture at the Welshpool facility. Jason Windows

18. Rylock Windows & Doors - in-house design and Australian manufacturing. Rylock

19. Anti-Dumping Commission - Collection and use of information policy. Information policy