



Australian Government
Department of Industry,
Science and Resources

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Anti-Dumping
Commission

Australian Industry Member Questionnaire

Case number: 691

Product: Aluminium windows and doors

From: The People's Republic of China

Investigation period: 1 July 2025 to 30 June 2025

Response due by: 27 January 2026

Email enquiries to: investigations1@adcommission.gov.au

Anti-Dumping Commission website: www.adcommission.gov.au

Responses to the exporter questionnaire must be submitted via SIGBOX. Please contact the commission on the above email address to request access to SIGBOX.

TABLE OF CONTENTS

TABLE OF CONTENTS 2

GOODS UNDER CONSIDERATION 4

SECTION A COMPANY AND LOCATION 5

A COMPANY REPRESENTATIVE AND LOCATION 5

SECTION B PRODUCTION OF LIKE GOODS..... 7

B-1 PRODUCTION 7

B-2 PRODUCTS IN THE AUSTRALIAN MARKET 8

C GOODS PRODUCED AND SOLD BY YOUR COMPANY..... 14

D ADDITIONAL INFORMATION OR COMMENTS 16

E CERTIFICATION..... 17

SIGNATURE: 17

NAME: 17

POSITION: 17

CONTACT NUMBER: 17

DATE: 17

Why you are receiving this questionnaire?

The Anti-Dumping Commission (the commission) is investigating whether aluminium windows and doors (AWD, the goods) exported to Australia from the People's Republic of China have been exported at dumped and subsidised prices and whether these exports have caused material injury to the Australian industry. The investigation was initiated after a joint application from Ventora Group Pty Ltd and the Australian Glass and Windows Association.

The initiation notice ([ADN 2025/115](#)) on the commission's electronic public record (EPR) for the investigation provides details of the goods under consideration, the application, and the investigation procedures. This notice and other public documents relating to the investigation can be accessed at: [EPR 691](#)

The commission collects and uses information in accordance with its [collection and use of information policy](#). If you have any questions about this questionnaire, please respond by return email to investigations1@adcommission.gov.au.

What happens if you do not respond to this questionnaire?

Your company is identified as an Australian producer of AWD. The commission is seeking input from your company as a manufacturer of AWD to inform its better inform its investigation of the claims made by the applicants, understanding of the dynamics of the Australian market and the factors that may be impacting the economic condition of the Australian industry producing AWD.

You do not have to complete the questionnaire. However, your insights and participation is greatly valued.

While the commission is seeking a response to all questions in the questionnaire, you may choose to answer only some of the questions, or alternatively you may wish to lodge a submission to the commission outlining your views on relevant aspects of the investigation. Information on how to lodge a submission.

Submitting a response to the questionnaire.

Responses to the questionnaire should be lodged by email listed on the cover page. In submitting the response to the questionnaire, you must answer all questions and include attachments, where relevant.

GOODS UNDER CONSIDERATION

The goods under consideration (the goods) i.e. the goods exported to Australia, allegedly at dumped and subsidised prices are:

Aluminium windows and doors, whether fully or partially assembled, including their frames, panels, and sashes, with or without glass, whether or not thermally broken, whether or not including hardware, up to the following dimensions:

- *for window assemblies or partial assemblies (including window frames, panels and sashes), up to and including 3.0 metres high and up to and including 4.0 metres wide; and*
- *for door assemblies or partial assemblies (including door frames, panels and sashes), up to and including 3.0 metres high and up to and including 7.0 metres wide.*

Further Information

“Fully assembled” refers to a complete window or door unit in which all frames and the applicable panels and/or sash are joined together to form a complete and functional window or door assembly, whether or not glazed, whether or not thermally broken, whether or not including hardware.

“Partially assembled” refers to a fabricated aluminium frame, panel, or sash assembly that is supplied individually or connected to other frame, panel, or sash assemblies, where the combination does not yet form a complete window or door unit, whether or not glazed, whether or not thermally broken, whether or not including hardware.

Exclusions

Excluded are curtain wall products.

SECTION A COMPANY AND LOCATION

A Company representative and location

1. Please nominate a contact person within your company:

Name: Basir Abbass
Position in the company: Director
Telephone: 03 9729 4088
E-mail address: basirabbass@icloud.com

2. If you have appointed a representative, provide their contact details:

Name: Clinton Skeoch
Address: Suite 1, Level 1, Building 1, 20 Bridge St, Pymble NSW 2073
Telephone: 02 9498 2768
E-mail address: ceo@agwa.com.au

In nominating a representative, you are granting authority to the commission to discuss matters relating to the case with the nominated representative, including your company's confidential information.

3. Do you authorise the commission to respond to limited enquiries from the Australian Glass and Windows Association (AGWA) regarding your company's participation in the investigation, such as confirming engagement or providing general progress updates? This authority does not extend to accessing or discussing any confidential information relating to your company (if you have appointed the AGWA as your representative in question 2, please mark "not applicable")

Yes

4. Please provide the location of your company's production plant manufacturing aluminium windows and doors

- 5 Diligent Drive Bayswater North Vic, 3153

5. What is the legal name of your business?

- B & P Group Pty Ltd

6. Does your company trade under a different name and/or brand? If yes, provide details.

- Accent Aluminium Windows & Doors

7. Was your company ever known by a different legal and/or trading name? If yes, provide details.

- The Accent Aluminium Windows Trading Trust
- Accent Aluminium Windows Unit Trust

8. What is the overall nature of your company's business? Include details of the products that your company manufactures and sells and the market your company sells into.

Accent Windows has been operating for over 40 years as an Australian owned and operated manufacturer and supplier of high-quality aluminium windows and doors for the residential and commercial building sectors. The company designs, fabricates, and supplies a broad

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range of aluminium products including awning windows, casement windows, sliding doors, bi-fold doors, fixed frames, entry doors, and specialised architectural systems. Accent's products are manufactured to meet Australian performance and safety standards, including energy efficiency, weather performance, and bushfire resistance.

Accent primarily serves the domestic residential market including homeowner replacements and renovation projects as well as builders, developers, architects, and construction contractors engaged in new residential and commercial builds. The company focuses on delivering locally manufactured, durable, compliant aluminium window and door solutions backed by Australian based customer service and warranty support.

Accent currently employs over 80 people across its Manufacturing plant including contracted installers who rely on the steady and regular work to remain operational.

Accent is an Australian migrant business success story. In 2019, Director Basir Abbass was a finalist in the Ethnic Business Awards, this was followed up by a visit to our manufacturing plant by the former Minister of Housing Michael Sukkar.

SECTION B

PRODUCTION OF LIKE GOODS

B-1 Production

1. The goods the subject of the application (the goods) are:

Aluminium windows and doors, whether fully or partially assembled, including their frames, panels, and sashes, with or without glass, whether or not thermally broken, whether or not including hardware, up to the following dimensions:

- *for window assemblies or partial assemblies (including window frames, panels and sashes), up to and including 3.0 metres high and up to and including 4.0 metres wide; and*
- *for door assemblies or partial assemblies (including door frames, panels and sashes), up to and including 3.0 metres high and up to and including 7.0 metres wide.*

Further Information

- “Fully assembled” refers to a complete window or door unit in which all frames and the applicable panels and/or sash are joined together to form a complete and functional window or door assembly, whether or not glazed, whether or not thermally broken, whether or not including hardware.
- “Partially assembled” refers to a fabricated aluminium frame, panel, or sash assembly that is supplied individually or connected to other frame, panel, or sash assemblies, where the combination does not yet form a complete window or door unit, whether or not glazed, whether or not thermally broken, whether or not including hardware.

Exclusions

Excluded are curtain wall products.

2. Please detail the products you produce as described in the above goods description. It may also be useful

- Accent designs, manufactures, supply and installs aluminium windows and doors across domestic and commercial ranges, including awning, casement, sliding, bi-fold, fixed, entry/entrance doors and custom assemblies. Accent emphasises Australian manufacturing and project installations and after sales support. Primarily servicing the Victorian market.
- Please refer to our attached brochure link as our Commercial/Domestic frame sizes and load ratings and product range are published for many product types (e.g., awning window, sliding door specs, max panel heights/widths, glazing capacities).
- Please find attached the Accent product brochures and catalogue
 - <https://www.accentwindows.com.au/wp-content/uploads/2024/09/Accent-Aluminium-Brochure-APR2024-A4-proof-3.pdf>
 - Also please refer to our website www.accentwindows.com.au

3. Please list the main raw material inputs and provide the source of those supplies, both locally sourced and imported.

Our main raw materials are locally sourced: including aluminium extrusions (profiles), glass/IGUs (insulated glazing units), sealants, weatherstrips, hardware (locks, rollers, hinges), finishes (anodising/paint).



B-2 Products in the Australian market

4. In relation to the Australian market for AWD, please outline:

Sources of demand for AWD

- Demand for AWD for Accent in Australia is primarily driven by the residential renovation and replacement market, particularly homeowners seeking improved energy efficiency, bushfire performance, acoustic performance and modern architectural outcomes.
- Additional demand is generated by new residential construction, including detached housing, townhouses and medium-density developments.
- The market also includes architectural and commercial building projects, as well as builders and contractors tendering for residential and commercial developments.
- Accent Windows supplies across these segments, with a strong focus on the residential replacement and new house build markets.

Causes of demand variability (e.g. seasonal fluctuations, factors contributing to overall market growth or decline, government regulation, or developments in technology affecting either demand or production)

- Demand fluctuates in line with seasonal building cycles and broader housing market conditions, including interest rate movements and construction commencements.
- Residential renovation activity plays a significant role in overall demand and has varied over recent years in response to economic conditions.
- Regulatory changes and evolving requirements relating to energy efficiency, bushfire performance and building compliance (including WERS and Australian Standards) influence product selection and demand.
- Demand can also be affected by supply chain disruptions and raw material availability in the construction sector, which have impacted project timelines and purchasing decisions.

The presence of market segmentation, such as geographic or product segmentation, or market segmentation relating to different end uses of

- The Australian AWD market is segmented geographically, with variations in demand and specification requirements across states, and regions and building designs.
- There is clear segmentation by end use, including residential replacement, new residential construction, and commercial/architectural applications.
- Product segmentation also exists based on performance requirements, such as standard aluminium versus thermally enhanced systems, and compliance-driven products including bushfire (BAL-rated) solutions.
- Accent operates across multiple segments, with a focus on compliant, customisable solutions suited to Australian conditions primarily within the Victorian market.

The way in which the imported and Australian manufactured AWD compete

- Australian manufactured AWD, including those supplied by Accent Windows, compete with imported products across key factors such as price, lead time, performance certification, warranty and perceived quality.
- Local manufacturers compete by offering products that are designed, manufactured and supported in Australia, ensuring compliance with Australian Standards and access to local technical, installation and warranty support.
- Imported and semi-fabricated products often compete aggressively on upfront price, supported by offshore manufacturing scale and lower production costs.
- This price competition places pressure on Australian manufacturers despite higher compliance obligations, local employment costs and long-term service commitments.

Any other factors influencing competition within the Australian market for AWD.

- Price undercutting by imported products is a significant competitive factor and has increasingly influenced purchasing decisions by builders and cost-sensitive consumers.
- Differences in compliance obligations, regulatory oversight and enforcement between Australian manufacturers and overseas suppliers can distort competitive conditions.
- The presence of imported products that may not offer equivalent long-term warranty backing or local service support affects competition, particularly where short-term price is prioritised over lifecycle value.
- Ongoing pricing pressure from imports risks undermining the sustainability of Australian manufacturing capability, local employment, skills retention and investment in technology.
- Accent is concerned that sustained reliance on unfairly low-priced imported AWD may reduce the viability of domestic manufacturers and weaken the long-term resilience of the Australian AWD industry.

5. In relation to the range of AWD offered for sale in the Australian market, please outline:

Sources and availability of supply

- Accent Windows manufactures aluminium windows and doors locally in Australia, supplying the domestic market from its Melbourne manufacturing operations.
- Accent's products are produced using aluminium extrusions and components sourced primarily from Australian suppliers, with fabrication, assembly, glazing and quality control undertaken locally.
- Supply availability for Accent-manufactured products is driven by local production capacity, labour availability, and lead times for raw materials such as aluminium extrusions, glass and hardware.
- Accent supplies products directly to homeowners, builders, developers and commercial project customers, with lead times managed locally and without reliance on international shipping or import logistics.
- In contrast, a portion of AWD available in the Australian market is supplied from overseas manufacturers, either as fully assembled imported products or as semi-finished systems, with availability dependent on offshore production schedules, shipping capacity, freight costs and port operations.

Product range or specification differences between Australian manufactured and overseas supplied goods

- Accent's Australian manufactured aluminium windows and doors are designed, tested and supplied to meet Australian Standards and regulatory requirements, including AS 2047, WERS energy performance ratings, and bushfire (BAL) requirements where applicable.
- Accent products are offered in a broad and customisable range, allowing for project-specific sizes, configurations, glazing options and performance requirements for both residential and commercial applications.
- Locally manufactured products supplied by Accent provide the benefit of Australian-based product knowledge and technical support, installation capability and warranty service, enabling responsive aftersales support and rectification where required.
- Overseas supplied AWD available in the Australian market are often produced to standardised specifications, which may limit design flexibility, customisation and suitability for certain Australian site or compliance requirements.
- Imported products may require additional compliance verification to demonstrate alignment with Australian performance standards and may not always offer the same level of local technical support or warranty responsiveness.
- While overseas-supplied AWD may be offered at lower upfront prices in some cases, Accent's Australian manufactured products compete based on compliance certainty, durability, performance, service support and local manufacturing capability.
- Accent provides a comprehensive 15-year replacement warranty on its products, reflecting confidence in product quality, durability and manufacturing standards.
- The warranty is backed by Accent's ongoing Australian operations and customer service team, providing customers with assurance that warranty support will be available over the long term.

Any actual or perceived quality differences between Australian manufactured and overseas supplied goods

- Accent's products are designed, fabricated and supplied to meet Australian Standards and regulatory requirements, including structural performance, weather performance, energy efficiency and bushfire ratings where applicable.
- Locally manufactured products supplied by Accent are subject to direct quality control, local testing, and oversight throughout the manufacturing and assembly process.
- Australian manufactured goods are generally perceived by customers to offer greater reliability, durability and consistency, particularly in relation to performance in Australian environmental conditions.
- Accent's products benefit from local technical support, installation oversight and after-sales service, which contributes to sustained product performance over time.
- Overseas-supplied goods may be produced to different standards or international specifications and may require additional verification to demonstrate compliance with Australian performance and certification requirements.
- There is a market perception that some imported products offer reduced customisation, limited support and variable quality outcomes, particularly where local service and warranty backing is limited or not supported by an Australian operating presence.

Any actual or perceived price differences between Australian manufactured and overseas supplied goods.

- Australian manufactured aluminium windows and doors, including those produced by Accent Windows, reflect the true cost of local production, including Australian wages, workplace safety obligations, regulatory compliance, quality assurance, and long-term warranty support.
- Overseas supplied aluminium windows and doors are often offered at significantly lower upfront prices, that raise legitimate questions about how they are achieved even when scale, labour costs, absence of employment obligations and regulatory requirements are considered.
- In the Australian market, there is a growing price driven purchasing behaviour, particularly among builders and cost sensitive consumers, where upfront price is increasingly prioritised over compliance certainty, long-term performance and local service support.
- Accent is concerned that the influx of lower priced imported products may distort competition in the Australian market, placing locally manufactured products at a disadvantage despite higher compliance and service standards.
- Sustained price undercutting by overseas suppliers creates a risk that Australian manufacturing jobs, skills and investment in local technology and production capability may be eroded, as local manufacturers are forced to compete against prices that may not reflect full production or compliance costs.
- There is a genuine concern that continued downward pressure on pricing may reduce the ability of Australian manufacturers to maintain local employment, invest in equipment and technology, and support local supplier networks.
- Accent's pricing reflects a commitment to long-term participation in the Australian market, supporting local jobs, local contractors and local supply chains, rather than short-term pricing strategies that may undermine the sustainability of domestic manufacturing.
- While imported products may appear more competitive on price at the point of sale, this does not always account for whole-of-life costs, including compliance risk, rectification, warranty enforcement and the availability of long-term local support.

6. In the last five years, have there been any notable changes in:

Consumer preferences for the goods, (e.g. new products within the goods description, new substitute products, preference for Australian produced over imported goods)

- There has been an increased consumer preference for higher-performing aluminium windows and doors, including improved energy efficiency, larger glazed openings, and products suitable for bushfire-prone and coastal environments.
- Customers increasingly seek customised solutions tailored to specific residential and commercial project requirements, rather than standardised, off-the-shelf products.
- While some consumers and builders continue to express a preference for Australian-manufactured products, particularly where compliance, quality and warranty support are valued, there has also been a noticeable shift toward price-driven purchasing behaviour.
- The increased availability of lower-priced imported products has influenced some builders and consumers to prioritise upfront cost over long-term performance and local manufacturing considerations.

Availability of supply to the Australian market (e.g. new participants)

- Over the past five years, there has been an increase in the availability of imported aluminium windows and doors supplied by overseas manufacturers and importers.
- New overseas suppliers have entered the Australian market, offering products either as fully assembled imports or semi-finished systems, often competing aggressively on price.
- The availability of imported products has expanded due to improved global logistics and established distribution networks within Australia, despite intermittent disruptions during the COVID period.
- This has resulted in a broader range of overseas-supplied products being readily accessible to Australian builders and consumers.

Ability of Australian industry to supply (e.g. product range, timeliness, limits on production capacity)

- Australian manufacturers, including Accent Windows, continue to offer a broad and adaptable product range, capable of meeting Australian Standards and project-specific requirements.
- The industry's ability to supply has been challenged by labour constraints, raw material price volatility, and supply chain disruptions, particularly during and following the COVID period.
- Despite these challenges, Accent has maintained local production capability, timeliness of supply and customer service through careful capacity management and reliance on domestic suppliers.
- However, sustained pricing pressure from imports limits the ability of Australian manufacturers to expand capacity or invest further in technology and automation.

Demand for the goods (e.g. increased construction and/or industrial activity)

- Demand for aluminium windows and doors has fluctuated over the past five years, influenced by residential construction cycles, renovation activity and broader economic conditions.
- There was a period of increased demand driven by residential renovation and replacement activity, followed by softening conditions associated with higher interest rates and reduced construction commencements.
- Overall demand remains closely linked to the level of residential and commercial construction activity in Australia.

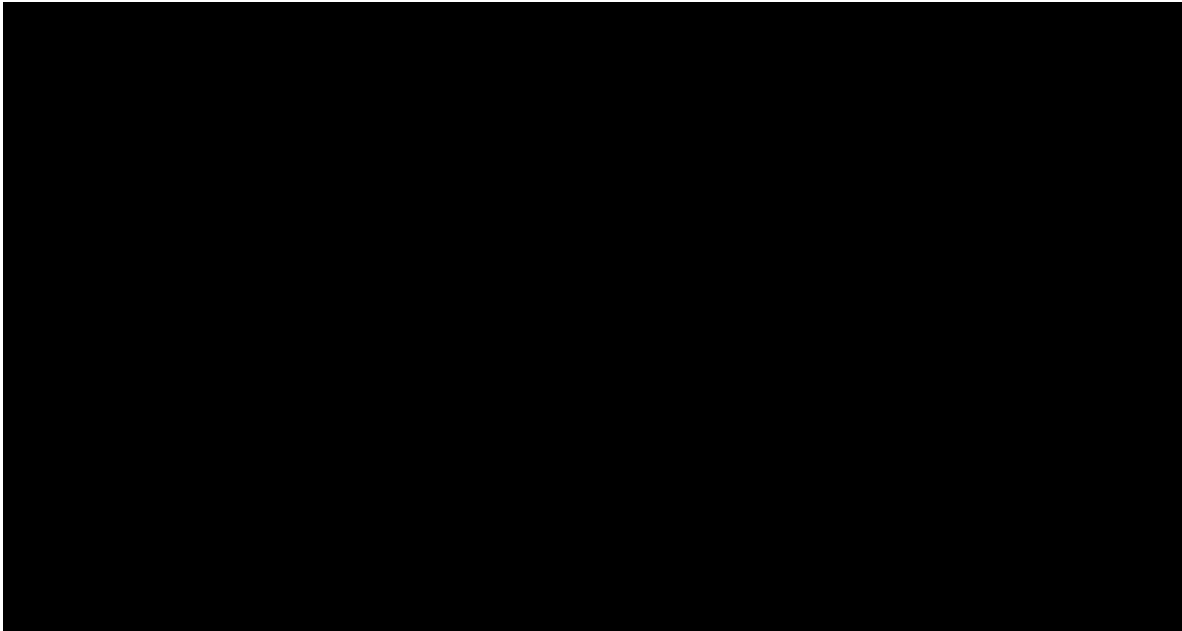
Conditions of competition for the goods.

- Competitive conditions have intensified, with price competition becoming more pronounced, particularly due to the increased presence of lower-priced imported products.
- This has placed downward pressure on prices and margins for locally manufactured products, affecting the sustainability of Australian operations.
- Competition increasingly occurs on price rather than performance, compliance or service, creating challenges for Australian manufacturers committed to local production, employment and warranty support.

7. Considering your responses to Q6 above, how have these changes impacted your business, specifically in the period from FY2022 to FY2025?

- Accent has operated in an increasingly price-competitive market, driven by the growing availability of lower-priced imported aluminium windows and doors, which has placed sustained downward pressure on selling prices and margins.
- Despite ongoing demand in certain market segments, particularly residential renovations, Accent has experienced increased difficulty in maintaining pricing levels that fully recover the cost of local manufacturing, compliance, installation and warranty obligations.
- Competitive pressure from imports has influenced project outcomes and tender competitiveness, with some opportunities lost or priced at reduced margins due to price-focused purchasing decisions by builders and developers.
- Over the period, Accent has faced rising input costs, including aluminium, glass, labour and compliance costs, which could not always be fully passed on to customers due to competitive constraints.

Confidential Breakout

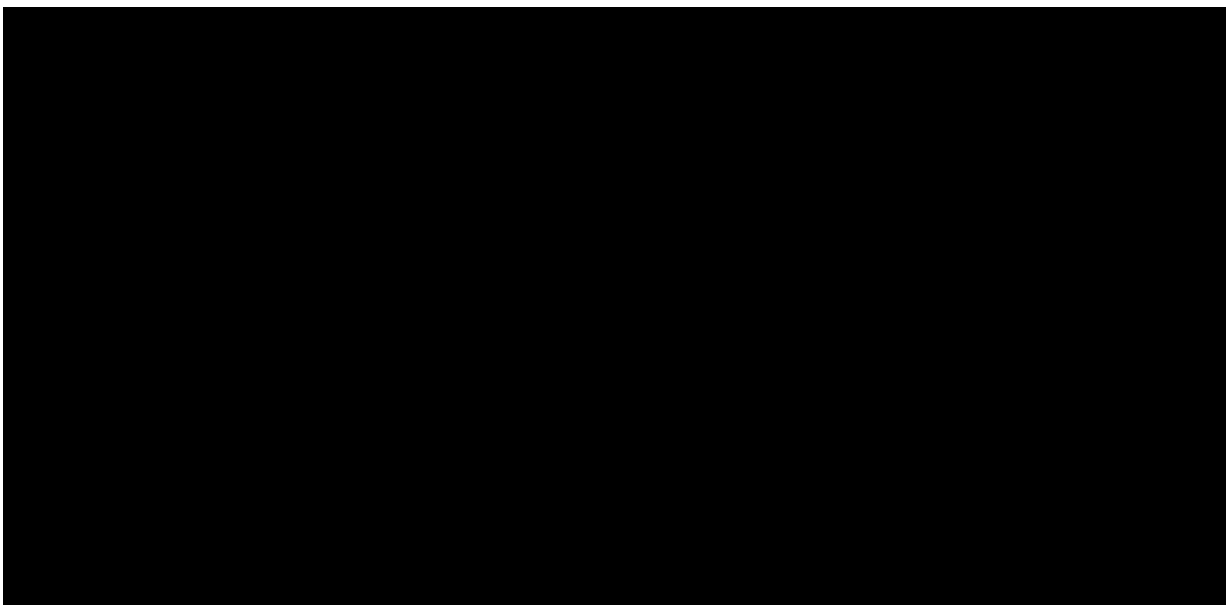
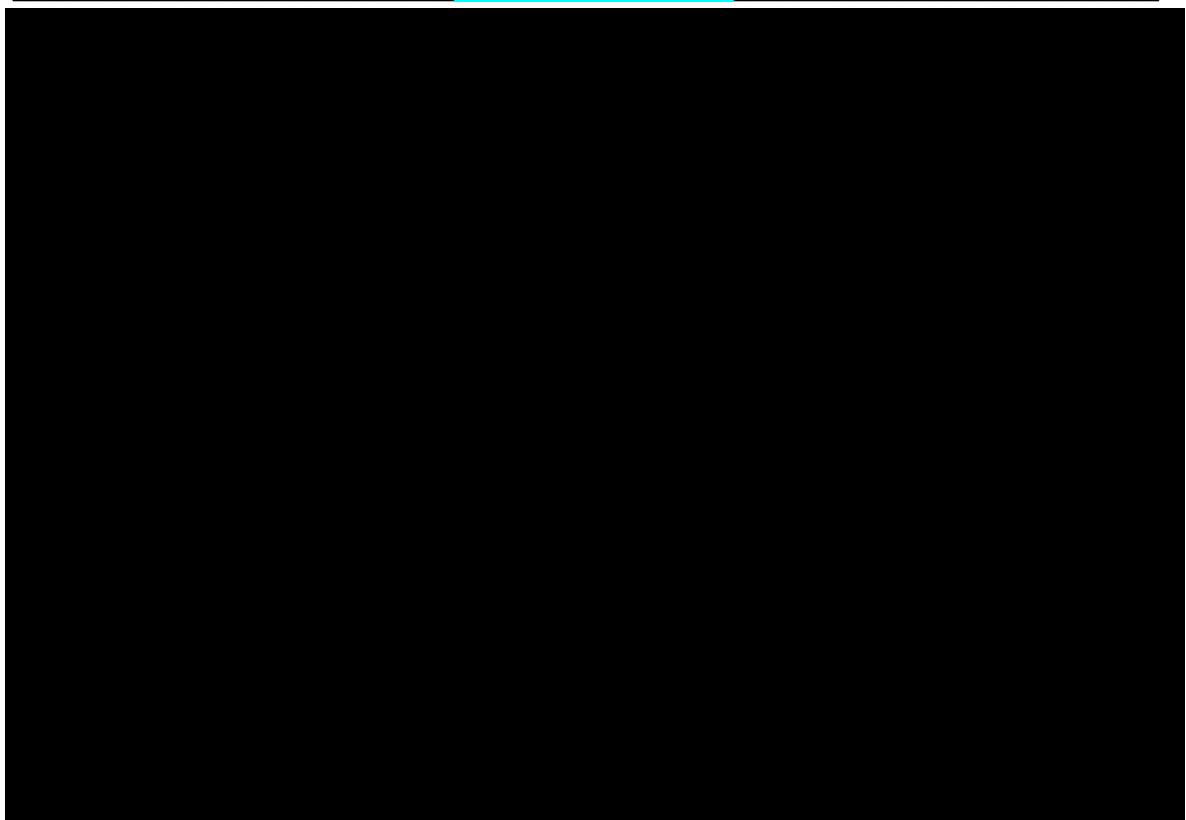


8. Do you anticipate any changes to the Australian market for AWD in the next five years? In your response, please comment on:

- **the short and medium term outlook for the Australian industry**
- The Australian AWD industry is expected to experience moderate demand growth driven by new housing and renovation activity.
- Regulatory emphasis on energy performance, bushfire resilience, acoustic performance and sustainability standards is likely to increase, favouring products that meet or exceed relevant Australian Standards.
- We are concerned on the price dumping from the Chinese products
- Price competition from imported products is expected to remain a persistent competitive factor should the commission not act, continuing to influence market pricing and industry dynamics.

- **any anticipated changes to demand and/or supply**
 - Continued demand in renovation and retrofit markets, particularly for energy efficiency and performance upgrades, upgrade requirement needs in existing housing stock.
 - Some market segments may soften if broader economic conditions deteriorate such as an increase in interest rates or a continued rise of construction costs.
 - **any anticipated changes to the conditions of the Australian market for AWD**
9. Who do you consider to be the price leader for AWD in the Australian market?
- The market pricing is largely dictated by the lowest-priced imported supply rather than by Australian manufacturers with local production, compliance and warranty obligations, establishing a de facto price benchmark.

Confidential Breakout





Confidential Breakout



12. Please rank the following factors in terms of their influence on your pricing decisions, with the most important factor ranked first (1) and the least (13) important factor ranked last.

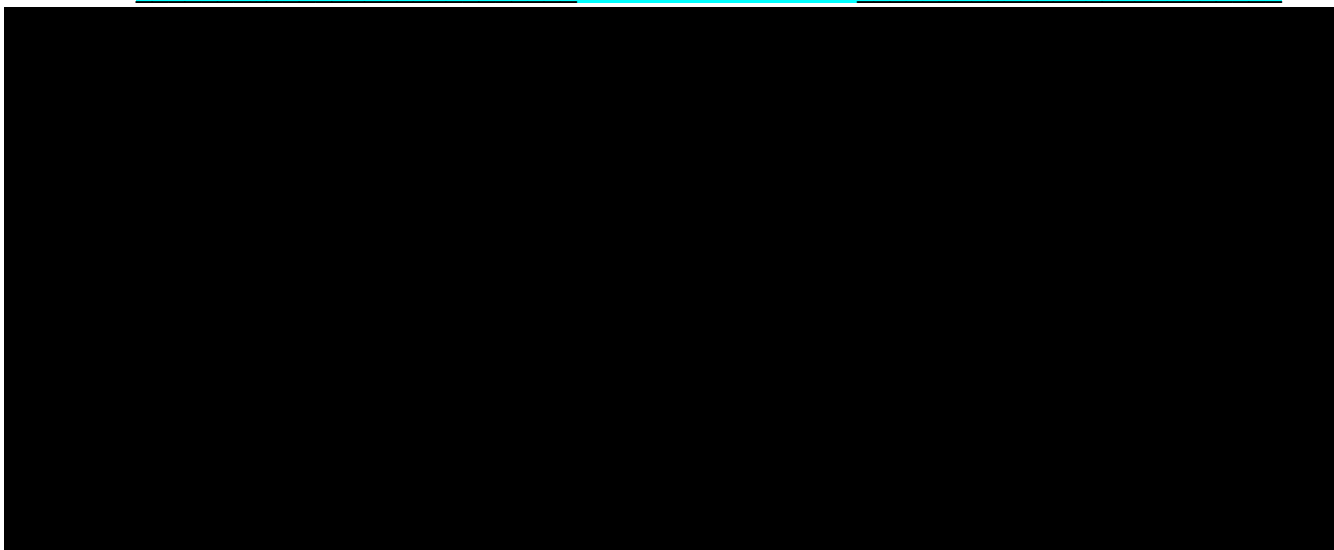
Rank	Factor
1	Cost to make and sell the goods
2	Competitors' prices
3	Desired Profit
4	Purchase price of raw materials
5	Value of the order
6	Volume of the order
7	Customer relationship management
8	Value of forward orders
9	Volume of forward orders
10	Level of inventory
11	Supplier relationship management
12	Brand attributes
13	Other

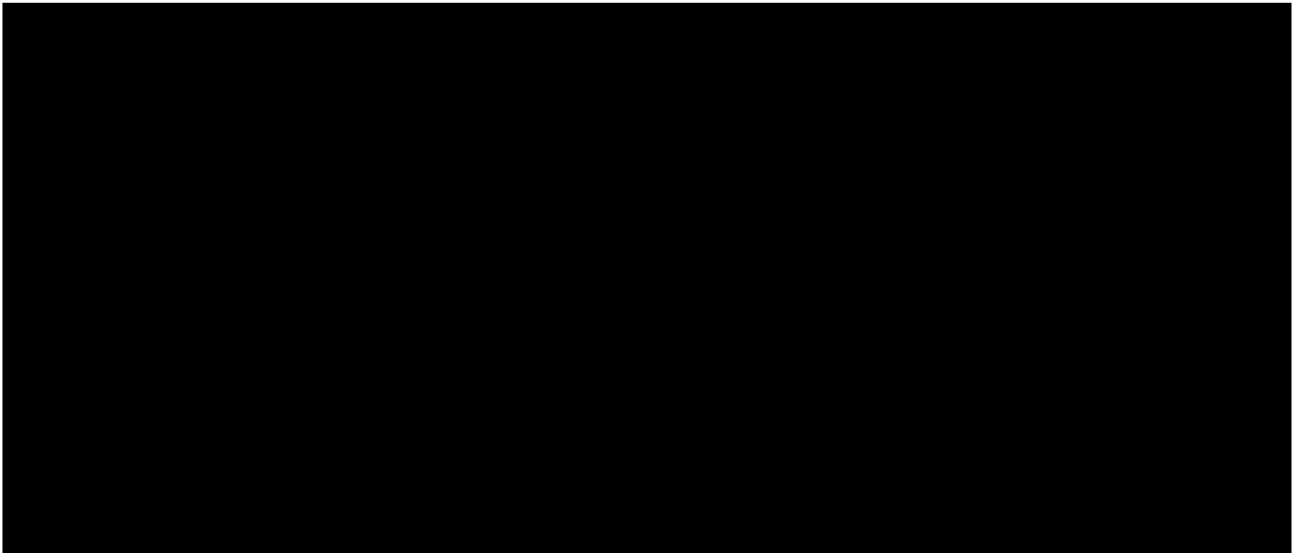
D Additional information or comments

Please add any comments in relation to the investigation, particularly in relation to the applicant's claims of injury caused by allegedly dumped and subsidised imports from China?

Accent Windows supports the applicant's claims that allegedly dumped and subsidised aluminium windows and doors imported from China have caused, and continue to cause, material injury to the Australian industry.

Confidential Breakout





Broader considerations for the Australian manufacturing sector

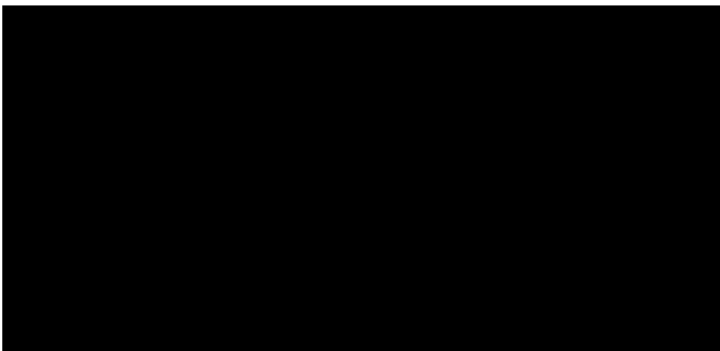
Accent considers that measures addressing unfairly traded imports, together with supportive domestic manufacturing policies, are necessary to ensure a competitive, sustainable and resilient Australian aluminium windows and doors industry.

E Certification

The information supplied in this questionnaire is complete and correct to the best of my knowledge:

The information supplied in this questionnaire is complete and correct to the best of my knowledge:

Signature:



Date: 19/01/2026