



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..... 10

 D ADDITIONAL INFORMATION OR COMMENTS 11

 E CERTIFICATION..... 12

SIGNATURE: 12

NAME: 12

POSITION: 12

CONTACT NUMBER: 12

DATE: 12

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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: Jeff Rotin
Position in the company: Chief Executive Officer
Telephone:
E-mail address:

2. If you have appointed a representative, provide their contact details:
Name:
Address:
Telephone:
E-mail address:

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 (if this is multiple sites, please just include the site addresses)
 1. 67 Robinson Road, Geebung, QLD
 2. 26B Long Street, Smithfield NSW
 3. 188 Canterbury Road, Bayswater, VIC
 4. 225 Benalla Road, Shepparton, VIC
 6. 9 Sparks Drive, Cambridge, TAS
 7. 17-21 Woomera Avenue, Edinburgh, SA
 8. 10 Jackson Street, Bassendean, WA

5. What is the legal name of your business?
Dowell Windows Pty Ltd

6. Does your company trade under a different name and/or brand? If yes, provide details.
NO

7. Was your company ever known by a different legal and/or trading name? If yes, provide details.
Dowell Australia Limited
Boral Window Systems Ltd
Boral Windows Pty Limited
Wunderlich Windows Pty Limited
Robb & Brown Pty Limited
Crane Windows

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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.

Dowell Windows Pty Ltd manufactures windows, doors and related screen and trim products made predominantly with aluminium framing but also with timber framing in some regions. The products made by Dowell are supplied predominantly (but not exclusively) into the detached, semi-detached and medium density residential housing segment within Australia. Typology of products manufactured include sliding, awning, casement, folding, fixed and louvre window systems in single glazed or double glazed configuration, in either aluminium frame, aluminium thermally broken frame or timber frame, in addition to sliding, hinged and folding door systems also in single glazed or double glazed configuration, in either aluminium frame, aluminium thermally broken frame or timber frame. It should be noted that not all window or door types are available in all glazing configurations or frame types. Dowell also manufactures flyscreens, fly doors, security screens and security doors for fitment to its window and door products.

Dowell also has its own wholly owned plastics manufacturing business (T/A Wunderlich Plastics) which manufactures extruded and moulded plastic materials used predominantly in the manufacture of window and door systems. These products are supplied both to Dowell and other third party customers.

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 for you to provide a product brochure or catalogue.

Dowell Windows Pty Ltd manufactures and supplies window and door products in **each of the forms as described above. Production volumes of such goods manufactured by Dowell have already been provided in earlier submissions.**

The nature of products supplied by Dowell Windows Pty Ltd may also be viewed on the official company website: www.dowell.com.au

3. Please complete the table below with your company’s production volume *and* any imported volume (of AWDs) for each 1 July to 30 June financial year (FY).

IMPORTANT NOTE FOR INDUSTRY MEMBER

If you have already supplied this information in the letters of support provided in support of the application, this is not required to be filled out.

Please instead confirm that those values are correct with a statement in response to this question: “*The values and volumes in our letter provided in support of the application support are accurate*”.

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

B-2 Products in the Australian market

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

- sources of demand for AWD
- 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)
- the presence of market segmentation, such as geographic or product segmentation, or market segmentation relating to different end uses of
- the way in which the imported and Australian manufactured AWD compete
- any other factors influencing competition within the Australian market for AWD.

1. Demand for AWD in Australia principally arises from:

- **New residential construction (detached housing, townhouses and multi-residential)**
- **Residential renovation and replacement activity**
- **New non-residential construction (commercial, industrial, institutional, education and health projects)**
- **Government and public sector projects (schools, hospitals, public housing and infrastructure-related facilities).**

2. Causes of Demand variability include:

- **The housing and construction cycle (dwelling approvals, commencements and completions)**
- **Interest rates, credit availability and consumer confidence affecting new home building and renovations**
- **Government stimulus or policy changes (e.g. home-building grants, social housing programs)**
- **NCC and Australian Standards changes that alter product requirements, particularly around energy efficiency, bushfire performance and fall prevention**
- **Broader economic conditions influencing commercial and industrial investment.**

These factors can result in quite pronounced peaks and troughs in orders, which affect production utilisation, labour planning and cost recovery.

3. The AWD market is significantly segmented:

- **Geographically – capital city vs regional markets, coastal vs inland climatic conditions, cyclone/bushfire zones and local builder preferences.**
- **By product type/price point – “builder grade” systems for volume residential projects, mid-range and architectural residential products, and heavier-duty commercial systems.**
- **By end use – project home builders, custom builders, commercial builders, facade contractors, direct-to-consumer/renovation, and government/institutional projects.**

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- **Different segments exhibit different price sensitivity and specification requirements.**

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

- sources and availability of supply
- product range or specification differences between Australian manufactured and overseas supplied goods
- any actual or perceived quality differences between Australian manufactured and overseas supplied goods
- any actual or perceived price differences between Australian manufactured and overseas supplied goods.

7. 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)
- availability of supply to the Australian market (e.g. new participants)
- ability of Australian industry to supply (e.g. product range, timeliness, limits on production capacity)
- demand for the goods (e.g. increased construction and/or industrial activity)
- conditions of competition for the goods.

1. Regulatory changes and consumer preferences:

- **Increased emphasis on energy efficiency (e.g. higher NCC thermal performance requirements, 7-star homes) and comfort, driving demand for double glazing and improved framing systems, both from a compulsory and also consumer education standpoint.**
- **Greater interest in larger openings (stacker doors, multi-panel sliders, “indoor-outdoor” living) and higher-end architectural aesthetics, even in volume housing.**

3. Ability of Australian industry to supply

- **Products required to meet local requirements are readily available from local suppliers.**
- **Volume constraints can occur at the most extreme peaks of the cycle however these are generally matched by skills, trades and other constraints in the wider building industry.**
- **Changes to product requirements have required local manufacturers to invest in product development, tooling and other areas in order to facilitate the manufacture of such products, adding to overall business costs and compressing margins.**

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- Labour availability, excessive wage growth (both Union and CPI driven) and increased regulatory compliance requirements have added to the cost base and operational complexity.

4. Demand for the goods:

- As part of the normal cyclical nature of residential building, there are periods of heightened residential construction activity followed by downturns as demand or fiscal policy / interest affect viability of building and renovation.
- Ongoing work in certain non-residential segments, but with increased price sensitivity and value-engineering.

8. Considering your responses to Q7 above, how have these changes impacted your business, specifically in the period from FY2022 to FY2025?

A decline in production volumes and revenue at levels higher than the decline in overall detached dwelling commencements (being Dowell's primary segment).

9. 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
- any anticipated changes to demand and/or supply
- any anticipated changes to the conditions of the Australian market for AWD

The Housing Industry Association (HIA) currently predicts an improving detached housing market for FY26, FY27 and plateauing in FY28 before declining quite sharply in FY29 and FY30 whereas multi-unit developments are forecast to continue to increase throughout the same period, pointing to a shift to higher density housing.

A key feature of higher density housing is often a greater level of standardisation and repetition and also the potential for longer lead times to be acceptable due to the longer planning and scheduling program. In these instances there is a greater risk that imported products, if offered at prices below their true production cost, could severely impact the ability for local suppliers to successfully win such work.

10. Who do you consider to be the price leader for AWD in the Australian market?

C Goods produced and sold by your company

11. Are the goods generally sold as individual items (i.e singular window or singular door) or on a project/tender basis?

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12. Please describe how the goods manufactured by your company are marketed and distributed?

13. Explain how the selling prices of the goods are determined.

Selling prices are determined using a combination of internal costing inputs and prevailing market considerations. Quotations are prepared using standardised internal procedures, with adjustments made in line with normal commercial practice.

14. 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.

- | | |
|------------------------------------|------|
| • Cost to make and sell the goods | (01) |
| • Desired profit | (02) |
| • Competitors' prices | (03) |
| • Customer relationship management | (04) |
| • Value of forward orders | (05) |
| • Other [Manufacturing Capacity] | (06) |
| • Volume of forward orders | (07) |
| • Value of the order | (08) |
| • Purchase price of raw materials | (09) |
| • Volume of the order | (10) |
| • Level of inventory | (11) |
| • Supplier relationship management | (12) |
| • Brand attributes | (13) |

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?

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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: 

Name: Jeff Rotin

Position: Chief Executive Officer

Contact number:

Date: 27 January 2026