



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.

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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: **Rachel Driessen**
Position in the company: **Director**
Telephone: **07 3877 2382**
E-mail address: **rachel_driessen@gjames.com.au**
2. If you have appointed a representative, provide their contact details:
Name: **Clinton Skeoch – Australian Glass & Window Association (AGWA)**
Address: **Suite 1, Level 1, Building 1, 20 Bridge Street, Pymble, NSW 2073**
Telephone: **02 9498 2768**
E-mail address: **clinton.skeoch@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")

Not Applicable

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)
 - **263 Edinburgh Road Edinburgh SA 5111**
 - **1082 Kingsford Smith Drive Eagle Farm QLD 4009**
 - **1007 Kingsford Smith Drive Eagle Farm QLD 4009**
 - **49-51 Enterprise Street Bundaberg QLD 4670**
 - **28 Redden St Cairns QLD 4870**
 - **46 Aurora Avenue Queanbeyan NSW 2620**
 - **636 Southport Nerang Road Ashmore QLD 4214**
 - **63-65 Booral Road Urangan QLD 4655**
 - **25 Habib Drive South Lismore NSW 2480**
 - **586 Maroochydore Road Kunda Park QLD 4556**
 - **40-42 Sodium Street Narangba QLD 4504**
 - **65 Pendlebury Road Cardiff NSW 2285**
 - **15 Verrall Street Riverview QLD 4303**
 - **8 Featherstone Street North Rockhampton QLD 4700**
 - **10 Grey Gum Road Taree NSW 2430**
 - **319 Taylor Street Toowoomba QLD 4350**
 - **599 Ingham Road Mt St John QLD 4818**
 - **23 Kingston Road Woodridge QLD 4114**
5. What is the legal name of your business?

G.James Glass & Aluminium (Qld) Pty Ltd

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

**G.James Windows & Doors
G.James Glass & Aluminium Pty Ltd
G.James Façade Solutions
G.James Glass products**

7. Was your company ever known by a different legal and/or trading name? If yes, provide details.
8. **No** 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.

The G.James Group of Companies is a proud Australian, family-owned manufacturing business with deep roots and a 108-year history of steady, purposeful growth. Our expertise spans the design and production of aluminium windows and doors, building façades, aluminium extrusions, and a comprehensive glass processing capacity covering glass toughening, lamination and insulating glass units.

From our beginnings as a single glass factory in Fortitude Valley, we have expanded through consistent reinvestment in Australian capacity. Today, more than 1800 employees work across over 35 sites nationwide, reflecting the scale and diversity of the operations we have built over more than a century.

The growth and success of G James is grounded in a family legacy of entrepreneurial stewardship, dedicated people, and the loyalty of customers across every part of Australia's aluminium window and glass industries. We take pride not only in designing, engineering and testing our own systems, but also in extruding our own aluminium and processing our own glass. In recent years, this has included commissioning the most advanced automated glass processing and IGU facility in Australia.

With our extensive national manufacturing and installation network and the proven capability of the G.James Windows & Doors and Commercial Façade Solutions divisions, we are uniquely positioned in the Australian market. More than any other local window and door manufacturer, we are able to design, engineer, manufacture, and install competitive, high-performance solutions tailored to the needs of Australian projects and conditions.

G.James aluminium glass windows and doors products include:

- Sliding, double hung, louvre, awning, casement, fixed windows**
- sliding, bi-fold, hinged, pivot, wardrobe and shower screen doors**
- Shopfronts, window walls, overhead, structural and decorative glazing**
- Standard and customised/bespoke Curtain wall**

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.

G.James aluminium glass windows and doors products include:

- **Sliding, double hung, louvre, awning, casement, fixed windows**
- **Sliding, Stacking, bi-fold, hinged, pivot, wardrobe and shower screen doors**
- **Shopfronts, window walls, overhead, structural and decorative glazing**
- **Standard and customised/bespoke Curtain wall**

Our product range can be found here: www.gjames.com

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*”

The values and volumes in our letter provided in support of the application support are accurate.

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

Our principal raw material inputs for aluminium windows and doors are:

- **Aluminium extrusions** – primarily locally extruded aluminium profiles with powdercoat and anodised finishes supplied by G.James internal group extrusion operations.
- **Glass** – including float glass, toughened glass, laminated glass and insulating glass units, supplied predominantly from Australian glass manufacturing/processing operations within our G.James group.
- **Hardware** – window and door locks, rollers, hinges, handles, stays and associated hardware. These are sourced from a combination of Australian-based suppliers and overseas manufacturers (including Europe & Asia).
- **Seals and gaskets** – EPDM and other gasket materials sourced from predominantly within our G.James group and Australian suppliers.
- **Powder coating / anodising materials** – architectural grade powder coatings and anodising chemicals sourced from Dulux and Interpon for finishing aluminium profiles.
- **Fasteners and consumables** – screws, anchors, sealants, packers and other fixings sourced from Australian distributors.
- **Packaging materials** – cardboard, timber and plastic packaging sourced locally for protection during transport and installation.

The majority of value added in our products is created in Australia through extrusion, finishing, fabrication, glazing and assembly.

B-2 Products in the Australian market

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

- sources of demand for AWD

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).
- **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)

Key drivers of variability in demand for AWD 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)

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- 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.
- Wet season and Cyclonic activity also influence construction seasonality and demand

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

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

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.

Different segments exhibit different price sensitivity and specification requirements.

- the way in which the imported and Australian manufactured AWD compete

In our experience, imported AWD (particularly from China) compete most directly in:

- standardised residential and low-rise & high-rise multi-residential projects, where a limited range of sizes and configurations covers a high proportion of openings and are pre-determined sizes
- price-driven commercial segments where upfront cost is the dominant decision factor for builders.
- Large high-rise markets (15-50 stories) where window supply is augmented with engineering and installation capabilities to deliver custom fenestration solutions.

Competition occurs across:

- Price – imported systems are frequently offered at significantly lower price points than comparable Australian-manufactured products, particularly in the high-volume detached builder and multi residential and high rise builder/developer markets.
- .
- Specification – imports are typically configured to meet generic minimum compliant specifications for the common climate and wind categories across Australia, while Australian manufacturers often provide a broader range of custom and project-specific solutions to ensure optimised value delivery.
- Lead time/reliability – local manufacturers often compete on shorter lead times, responsiveness and after-sales support, whereas imports can be more exposed to shipping and logistics disruptions.
- Perceived compliance risk – Australian producers invest heavily in the design, testing, and certification of their systems to meet Australian Standards and the National Construction Code. These processes are not simply regulatory steps, they are deliberate investments in product integrity, safety, and long-term performance. Increasingly, specifiers and builders

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recognise that this level of assurance cannot always be matched by imported alternatives, where compliance pathways and accountability may be less transparent.

- any other factors influencing competition within the Australian market for AWD.

Additional factors influencing competition in AWD include:

- builder practices (increasing specification changes, value-engineering and substitution during projects)
- the bargaining power of large volume builders and commercial contractors, who use imported offers as a benchmark when negotiating with local suppliers
- increasing complexity and cost of regulatory compliance for Australian manufacturers
- rising domestic labour, energy and compliance costs and availability of local skilled labour

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

- sources and availability of supply

AWD are supplied to the Australian market by:

- Australian manufacturers (such as ourselves and other AGWA members) with national and regional fabrication networks
 - importers and distributors sourcing finished or semi-finished windows and doors from China and other countries
 - some builders and contractors who directly import containers of pre-fabricated window and door packages for specific projects.
- product range or specification differences between Australian manufactured and overseas supplied goods

Key product and specification differences between Australian-manufactured and imported AWD include:

- Australian manufacturers typically offer a wider range of systems designed and tested specifically for Australian conditions, wind loads and climate zones.
 - Imported systems tend to focus on high-volume, standardised residential sizes and may offer a narrower range of performance options (e.g. fewer bushfire, acoustic or high-performance energy-efficient variants).
 - Australian product catalogues often incorporate project-specific engineering options, bespoke framing and integration with other facade elements; imports are more commonly “standard packages” for common building or house designs.
- any actual or perceived quality differences between Australian manufactured and overseas supplied goods

In the market there is a perception that:

- Australian-manufactured systems generally provide more robust long-term performance, particularly around hardware durability, serviceability, water penetration and after-sales support.
- Imported product quality can be variable – some products are adequate, while others raise concerns around dimensional tolerances, hardware life, glass quality, finishing and long-term performance under Australian conditions.
- any actual or perceived price differences between Australian manufactured and overseas supplied goods.

Imported AWDs from China are generally perceived, and in our experience observed, to be cheaper than comparable Australian-manufactured products in the segments where they compete.

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.

Over the past five years we have observed notable changes in the AWD market:

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.
- Greater interest in larger openings (stacker doors, multi-panel sliders, “indoor-outdoor” living) and higher-end architectural aesthetics, even in volume housing.

Availability of supply

- Growth in the presence of imported AWD from China in standard residential, low-rise and high-rise multi-residential segments.
- Consolidation and rationalisation among some Australian manufacturers, alongside investment by others in automation and capacity.

Increased capacity and availability of high-performing Insulated glass unit processing capacity. Ability of Australian industry to supply

- Australian manufacturers have generally maintained the technical capability to supply a wide range of compliant products.
- While many have invested in next generation products for the changing code requirements, the ongoing development in new tooling, automation and product development is impacted while imported window supply offers unsustainably constrain margins

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- Labour availability, excessive wage growth (Union-driven) and increased regulatory compliance requirements all add to the cost base and operational complexity.

Demand for the goods

- Periods of heightened residential construction activity followed by interest rates increases have seen reduced activity and builder failures in some sectors.
- Ongoing work in certain non-residential segments, impacted by increased price sensitivity and ongoing value-engineering.

Conditions of competition

- Intensified price competition in the residential builder segment, with imported Chinese products increasingly referenced in negotiations.
- Greater use of alternative procurement models (e.g. builders bundling imported window/door packages into turnkey offers).
- An overall environment where input costs have risen significantly, but the ability to recover these costs in selling prices has been curtailed by import competition.

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

Between FY2022 and FY2025 our business has experienced:

- A decline in production volumes and revenue in segments where imports are most active.

Had to price more aggressively or absorb cost increases to retain key builder and project customers In practice, this means that even where top-line prices have risen due to general inflation and specification changes, our margins have been squeezed and our overall business performance has been impacted relative to the level of effort, risk and capital tied up in the business.

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

Looking ahead over the next five years, we anticipate:

Short and medium-term outlook for the Australian industry

- A challenging trading environment, particularly for residential and multi residential focused manufacturers.
- Ongoing margin pressure unless unfairly priced imports are addressed.

Anticipated changes to demand and/or supply

- Gradual normalisation of demand at levels more reflective of long-term housing and population trends.

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- Continued demand growth for higher-performance products (thermal, acoustic, bushfire) driven by regulation and consumer preference.
- Increased import penetration if strong price differentials remain unchecked.

Anticipated changes to market conditions

- Further consolidation within the Australian industry if some manufacturers cannot sustain operations under current price pressures.
- Greater scrutiny of compliance, safety and performance, which may highlight risks associated with imported AWD that do not fully meet Australian standards.
- A need for ongoing investment by local manufacturers in automation, digital tools and new product development.

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

In the residential, low-rise and high-rise multi-residential segments, importers of Chinese-origin aluminium windows and doors have, in effect, become the price leaders, particularly for standardised product lines used by volume builders.

In more complex commercial applications particularly those involving integrated engineering, design, manufacture and installation, pure product price leadership is often difficult to isolate. However, we are increasingly seeing commercial window companies adopting hybrid or full import supply models, successfully winning tenders with them. This trend is a clear indicator of the strong price leadership exerted by imports.

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?

We sell aluminium windows and doors both:

- as individual items (e.g. through branch/trade counters and smaller renovation projects), and
- on a project/tender basis for residential builders, multi-residential and commercial projects.

The majority of our volume, by value and units, is sold on a project/tender basis to builders and contractors.

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

We market and distribute our products primarily through:

- our national branch network and showrooms which services local builders, trade accounts and retail customers
- direct relationships with volume residential builders, custom builders and commercial contractors
- participation in tenders for multi-residential, commercial and government projects
- design and technical support to architects, designers and engineers (product literature, specification support and compliance documentation).

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Distribution is mainly direct from our manufacturing and branch network to building sites across Australia, using our own logistics capability supplemented by third-party carriers where required.

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. For project and tender work, 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.

1. Competitors prices
2. Cost to make and sell the goods
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. Brand attributes
12. Supplier relationship management
13. Other – e.g. strategic importance of the customer or project, and long-term pipeline considerations.

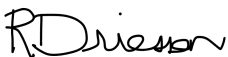
D Additional information or comments

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?

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: Rachel Driessen

Position: Executive Director

Contact number: 0419645262

Date: 27 January 2026