The Claimed 55% Production Share

Submission concerning industry representation and verification | Investigation 691

Executive Summary

EcoEco challenges the applicant's assertion that Ventora and 21 selected supporters account for 55% of Australian production. This submission identifies the records capable of testing that assertion, establishes who holds those records and specifies precisely what the Commission must independently reconcile.

AGWA's audited 2024 accounts report 921 members, equivalent in number to 63.30% of the 1,455 enterprises identified by IBISWorld. Yet the 21 selected supporters constitute only 2.28% of AGWA membership and 1.44% of the IBISWorld enterprise population. Including Ventora, the 22 entities constitute only 2.39% and 1.51% respectively.

Those figures do not mathematically disprove a 55% production share. They establish that the claim is extraordinary and requires compelling evidence. The claim is also inconsistent with the available IBISWorld evidence describing the industry as highly fragmented and reporting that the four largest firms—including Ventora's predecessor—collectively accounted for less than 15% of industry revenue immediately before the injury period.

AGWA holds the declared turnover or turnover-band information used to determine its members' subscriptions. The Commission must obtain that information and reconcile it against the applicant's claimed production share. It must also verify the manufacturing status, product scope, production and independence of every entity counted among the 21 supporters.

The reconciliation must identify the complete producer population, the goods counted, the measurement used, the denominator, the production attributed to Ventora and each supporter, the production omitted from the calculation and the treatment of system owners and licensed fabricators. It must eliminate overlap, double counting or attribution of the same production to both a system owner and the fabricator that manufactured the finished goods.

> **The applicant bears the burden of proving the asserted 55%, and the Commission bears responsibility for independently verifying it. Unless the claimed share is affirmatively verified, it must be rejected.**

1. The numerical disparity

The asserted 55% is fundamental to industry standing, representativeness, injury and the weight given to the supporters' evidence. The applicant must substantiate it, and the Commission must independently verify it.

Comparison	Entities	Percentage
AGWA membership relative to IBISWorld enterprises	921 of 1,455	**63.30%**
Selected supporters relative to AGWA membership	21 of 921	**2.28%**
Ventora and supporters relative to AGWA membership	22 of 921	**2.39%**
Selected supporters relative to IBISWorld enterprises	21 of 1,455	**1.44%**
Ventora and supporters relative to IBISWorld enterprises	22 of 1,455	**1.51%**

EcoEco does not contend that enterprise numbers determine production share. Nor does it equate AGWA membership, industry revenue and physical production. These are different measures. The figures establish the magnitude of the evidentiary question that must be answered:

How can 22 selected entities—only 2.39% of AGWA membership and 1.51% of the IBISWorld enterprise population—account for 55% of Australian production?

2. Conflict with independent industry evidence

IBISWorld described the industry as highly fragmented and reported that its four largest firms—including Ventora's predecessor—collectively accounted for less than 15% of industry revenue immediately before the injury period.

For Ventora and the 21 selected supporters to account for 55% shortly afterwards at least one major structural or methodological change must have occurred:

(a) significant industry consolidation;
(b) large-scale exit of other manufacturers;
(c) extraordinary growth by Ventora or the selected supporters;
(d) a radically narrower product definition;
(e) a physical-production measure producing a materially different result from revenue;
(f) omission of substantial fabricator or non-member production from the denominator;
(g) attribution of production to system owners rather than the fabricators that manufactured the finished goods; or
(h) overlap or double counting between system owners and licensed fabricators.

No such change has been adequately identified or quantified in the publicly available material.

The IBISWorld industry definition and revenue measure may not be identical to the Commission's product definition and production measure. That does not resolve the discrepancy. It makes disclosure of the Commission's population, product scope, measurement basis and denominator essential.

3. AGWA holds the information capable of testing the claim

AGWA holds the declared turnover or turnover-band information used to determine its members' subscriptions. Its 921 members are equivalent in number to 63.30% of the enterprise population identified by IBISWorld. AGWA therefore holds information covering a substantial part of the industry population and capable of providing an independent cross-check of the asserted 55%.

The Commission must obtain AGWA's relevant membership and turnover information and reconcile it against the applicant's claimed production share.

The Commission may examine individual company information confidentially while publishing:

(a) the aggregated results;
(b) the population used;
(c) the calculation method and measurement basis;
(d) the treatment of different industry participants; and
(e) a non-confidential explanation of its verification.

Commercial confidentiality does not justify accepting an unsupported percentage or withholding the methodology necessary for affected parties to understand and test it.

4. Supporter identity does not establish production share

Support for the application does not establish a company's status as an Australian manufacturer, its production of the goods under consideration, its production volume, its independence from another supporter, or its contribution to the claimed 55%.

Several supporters appear to be fabricators rather than major system owners or national-scale manufacturers. The Commission must determine whether each supporter:

(a) manufactures the goods under consideration in Australia;
(b) manufactured those goods during the relevant period;

(c) owns the relevant window or door system;
(d) fabricates products under a system owned by another entity;
(e) operates independently or belongs to a related corporate group;
(f) has had its production attributed to a system owner;
(g) has also had its production separately counted; and
(h) has supplied records capable of verifying the production attributed to it.

In my 30 years' experience in the aluminium window and door industry, I do not accept that Ventora and these 21 selected supporters account for 55% of the relevant Australian business. Their identities, manufacturing functions, locations and apparent scale do not support that conclusion.

That experience is not offered as a substitute for production evidence. It reinforces why the unexplained claim cannot be accepted without examination of the underlying records.

5. Company-by-company verification

Annexure A, Manufacturer Verification Matrix, examines each of the 21 identified supporters and records its apparent AGWA membership, Australian manufacturing activities, potentially excluded products and services, status as a system owner or fabricator, corporate or licensing relationships, and the production evidence requiring Commission verification.

On the available public evidence, all 21 supporters appear to have some connection with AGWA. Current membership by the precise legal entity must nevertheless be confirmed against AGWA's membership register. An awards page, accreditation list or finalist list does not by itself establish continuous membership by the named legal entity. Nor does membership establish qualifying production.

The matrix identifies matters requiring investigation, including:

(a) possible overlap between Aliview and Ventora/A&L production;
(b) possible overlap between Clark Windows Tasmania and Bradnam's production;
(c) inclusion of excluded goods within diversified group figures;
(d) inclusion of installation, glazing, replacement, repair or project-service revenue;
(e) production belonging to another group company or trading entity; and
(f) whether claimed production is consistent with each supporter's facilities and apparent scale.

6. System owners and fabricators

A system owner may design, own or distribute an aluminium window and door system while independent or licensed fabricators manufacture the finished windows and doors. It may supply extrusions, hardware, specifications or licences without manufacturing every finished product sold through the network.

The Commission must identify where production legally and economically occurs. It must not:

(a) attribute a fabricator's finished-product production to a system owner without explanation;
(b) count the same production for both system owner and fabricator;
(c) include selected fabricators while excluding comparable non-supporting fabricators;
(d) treat extrusion sales as finished-window production; or
(e) omit a substantial part of Australian fabricator production from the denominator.

7. Required reconciliation

The Commission's reconciliation must establish and disclose:

(a) the complete population of Australian producers of the like goods;
(b) the number of relevant AGWA-member and non-member producers;
(c) the precise goods included and excluded;
(d) the calculation period;
(e) the measurement used—turnover, units, weight, square metres or another measure;
(f) the complete denominator;
(g) the production attributed to Ventora and to each supporter;

(h) the aggregate production of all other Australian producers;
(i) the basis for classifying each entity as a producer;
(j) the treatment of system owners, fabricators, related companies, groups and trading names;
(k) whether substantial production was omitted or wrongly attributed; and
(l) whether any production was counted more than once.

The Commission must publish a non-confidential reconciliation showing the aggregate shares attributable to Ventora, the 21 supporters, other relevant AGWA members, relevant non-AGWA manufacturers and the total Australian industry.

8. Independent audit

The Commission should not rely merely upon a percentage supplied by the applicant or an interested industry association. The underlying records must be tested against AGWA's classifications and turnover information, the applicant's and supporters' production records, corporate relationships, manufacturing locations, system-owner and fabricator arrangements, and the independently reported structure and scale of the industry.

If turnover is being compared with production volume, or broad industry revenue with a narrowly defined product class, the Commission must explain and quantify the difference. A difference in measurement cannot simply be invoked to disregard the independent evidence.

9. Required determination and disclosure

EcoEco does not request that the Commission merely note the discrepancy or make further enquiries without reporting the outcome. The Commission must make and publish a specific determination as to whether the asserted 55% has been verified.

The Commission's public findings must state:

(a) whether the 55% is accepted, revised or rejected;
(b) the verified aggregate share attributable to Ventora and the 21 supporters;
(c) the product scope, measurement basis, period and denominator used;
(d) the number of Australian producers included;
(e) how system owners and licensed fabricators were treated;
(f) whether omitted production, overlapping attribution or double counting was corrected; and
(g) the effect upon industry standing, representativeness and continuation of the investigation.

Individual company information may properly remain confidential. That does not prevent disclosure of the aggregated percentage, methodology, findings and reasons. A statement that the material has been examined, without the resulting aggregate finding and an intelligible explanation, would not answer the issue raised.

> **The Commission must supply affected parties with a non-confidential result sufficient to demonstrate whether the 55% claim was verified and how that conclusion was reached.**

10. Requested action

The presently disclosed figures cannot be reconciled:

(a) Ventora and the 21 supporters comprise only 2.39% of AGWA membership;
(b) they comprise only 1.51% of the IBISWorld enterprise population;
(c) IBISWorld reported that the four largest firms collectively held less than 15% of industry revenue immediately before the injury period; yet
(d) the application attributes 55% of Australian production to those 22 entities.

This is not a minor statistical difference. It goes directly to the reliability of the application and the claimed representation of the Australian industry.

EcoEco requests that the Commission:

(a) obtain the records supporting the 55% calculation;
(b) obtain AGWA's relevant membership classifications and declared-turnover information;
(c) independently audit and reconcile those records;
(d) verify the manufacturing status and Australian production of every entity counted;
(e) eliminate omitted production, inconsistent attribution, overlap and double counting;
(f) publish the required non-confidential determination and reconciliation; and
(g) reconsider industry standing, representativeness and continuation of the investigation if the asserted share is not verified.

Conclusion

The applicant bears the burden of proving the asserted 55%, and the Commission bears responsibility for independently verifying it.

EcoEco has identified the evidentiary conflict, the records capable of resolving it, the organisation holding those records, the entities whose production must be verified, the potential for omission and double counting, and the precise reconciliation required.

The Commission must now determine whether the 55% figure is correct and publish its non-confidential result, methodology and reasons.

> **Unless the claim is affirmatively verified, it must be rejected and cannot support any finding that Ventora and the 21 selected supporters represent the Australian industry.**

Annexure A — Manufacturer Verification Matrix

The separately supplied Investigation 691 Manufacturer Verification Matrix forms Annexure A to this submission.

Purpose: To test whether each of the 21 supporting entities manufactured qualifying aluminium windows and doors during FY2025, whether each was an AGWA member, and whether its claimed production was properly isolated from excluded products, services, related entities and possible duplication.

On the available public evidence, the entities appear to have some connection with AGWA. Current membership by each precise legal entity requires confirmation from AGWA's membership register.

Inclusion in the matrix records only that the entity has been identified as a supporter. It does not concede that the entity manufactured the goods under consideration during the investigation period or that any production attributed to it has been independently verified.

Sources

AGWA, Financial Annual Report 2024.

IBISWorld industry evidence referenced in EcoEco's submission, including the reported 1,455 enterprises and concentration of the four largest firms immediately before the injury period.

Edward Stelling
Chief Executive Officer
EcoEco Windows & Doors Pty Ltd

Signature:

Date: **6 September 2026**

Investigation 691 — Manufacturer Verification Matrix

Purpose: To test whether each of the 21 supporting entities manufactured qualifying aluminium windows and doors during FY2025, whether each is an AGWA member, and whether its claimed production was properly isolated from excluded products, services, related entities and possible duplication.

Company-by-company review

No.	Company	Status	AGWA membership evidence	Other or potentially excluded activities	Verification issue	Comments / evidence
1	Aliview Group Pty Ltd	Yes	Yes — AGWA 2025 accreditation list; 2026 finalist	Shower screens, robes and splashbacks	A&L licensee. Confirm its production was not included in Ventora/A&L figures.	
2	Bradnam's Windows and Doors Pty Ltd	Yes – substantial	Yes — AGWA 2024 QLD awards page	Glass, extrusions, plastics, screens and shower screens	Isolate qualifying aluminium window and door production; exclude other manufacturing.	
3	Clark Windows Tasmania Pty Ltd	Yes	Yes — AGWA 2025/2026 finalist lists	IGUs, glass processing and powder-coating	Bradnam's licensed manufacturer. Check for overlap or double counting with Bradnam's.	
4	Coastal Windows & Doors Pty Ltd	Yes	Yes — AGWA member profile and 2025 accreditation list	Installation and project services	Confirm FY2025 qualifying production volume and exclude installation.	
5	Dowell Windows Pty Ltd	Yes – substantial	Yes — AGWA 2025 finalist list	Timber windows and doors; screens	Exclude timber and other non-aluminium products.	
6	Evolution Window Systems Pty Ltd	Yes	Yes — AGWA 2025/2026 finalist lists	Timber products, installation and project services	Isolate aluminium window and door production.	
7	G James Glass and Aluminium (QLD) Pty Ltd	Yes – substantial and diversified	Yes — AGWA 2025/2026 finalist lists	Glass, extrusions, castings, curtain wall, façades, cladding and other aluminium products	Substantial group activity is outside the defined goods. Verify the exact legal entity and qualifying output.	
8	Glass Co. (Metro) Pty Ltd	Yes	Yes — AGWA 2025/2026 finalist lists	Shower screens, mirrors, wardrobes and splashbacks	Exclude non-window-and-door products and installation.	
9	Glass Co. WA Pty Ltd	Yes	Yes — AGWA 2025 accreditation list	Wholesale glass, balustrades, shower screens, wardrobes, screening and installation	Confirm relevant window-production volume separately from its wider glass business.	
10	GP Glass Pty Ltd	Apparently yes	Yes — AGWA 2025/2026 finalist lists	Showerscreens, balustrades, glazing and installation	Obtain direct evidence of FY2025 aluminium window and door manufacturing and volume.	
11	Hanlon Windows (Aust) Pty Ltd	Yes	Yes — AGWA 2026 finalist list	Cedar and timber products, skylights and installation	Exclude timber, resold products and installation.	
12	Jason Windows Pty Ltd	Yes	Yes — AGWA 2025 accreditation and finalist lists	Screens and associated products	Isolate qualifying aluminium window-and-door production.	
13	LGA (WA) Pty Ltd	Yes	Yes — AGWA 2025/2026 finalist lists	Installation, glazing and project services	Regional producer; verify the claimed FY2025 production scale.	

No.	Company	Status	AGWA membership evidence	Other or potentially excluded activities	Verification issue	Comments / evidence
14	Magic Glass Pty Ltd	Yes, with qualifications	Yes — AGWA 2025 accreditation; 2026 finalist	Repairs, glass replacement, glazing, façades, partitions, installation and rope-access services	Determine how much activity constitutes manufacture of qualifying goods rather than services.	
15	MCG Windows & Doors Pty Ltd	Yes	Yes — current MCG website expressly displays AGWA-member badge	Replacement and installation services	Exclude installation and confirm qualifying production volume.	
16	Nu-Look Windows (W Loftus & Co Pty Ltd)	Yes	Yes — AGWA 2025 finalist list	Installation, screens and glass-related services	Verify production belongs to the named legal entity and exclude services.	
17	PCW Commercial Windows Pty Ltd	Yes	Yes — AGWA 2025 accreditation; 2026 finalist	Installation, glazing and project services	Confirm qualifying manufactured units separately from installation value.	
18	Rylock Pty Ltd	Yes	Yes — AGWA 2025 accreditation; 2026 finalist	Site glazing, service and installation	Isolate qualifying Australian production.	
19	Taberners Windows & Doors Orange Pty Ltd	Apparently yes	Yes — AGWA 2024 NSW awards page	Installation, glazing and complementary products	Obtain direct proof of manufacturing by the named entity and its FY2025 volume.	
20	Taylors Window Supplies Pty Ltd	Yes	Yes — AGWA 2025/2026 finalist lists	Replacement, installation and related products	Isolate qualifying production from services and other products.	
21	Vivid Glass Windows and Doors Pty Ltd	Yes	Yes — AGWA 2025/2026 finalist lists	Glass, fencing, screens, wardrobes, mirrors, showerscreens, balustrades and other products	Highly diversified; exclude all non-window-and-door production and services.	

Overall assessment

Question	Present finding	Evidence required from Commission	Comments / response
Are all 21 AGWA members?	Yes — supported by current public evidence	AGWA membership register showing legal entity, membership number, category and current status	
Are all 21 involved in aluminium windows or doors?	Yes, or apparently yes	Confirmation for each named legal entity	
Are all 21 principally aluminium-window manufacturers?	No	Revenue and production segmentation by activity	
Did all 21 manufacture qualifying like goods during FY2025?	Not established publicly	FY2025 production records for each supporter	
Is all their turnover relevant?	No	Separation of goods, services and excluded products	
Is all their window-and-door turnover relevant?	Not necessarily	Exclusion of timber, imported/resold and out-of-scope products	
Were installation and glazing services excluded?	Unknown	Reconciliation from sales values to production quantities	
Were curtain wall and façade products excluded?	Unknown	Product-level reconciliation, especially for G.James and Magic Glass	
Was Aliview production separated from Ventora/A&L?	Unknown	Related-party/licensee reconciliation	
Was Clark production separated from Bradnam's?	Unknown	Licensed-manufacturer reconciliation	
Were related entities and trading names checked?	Unknown	Legal-entity and ownership schedule	
Was any production counted twice?	Not testable from the EPR	Consolidated entity-by-entity production schedule	
Do the 21 plus Ventora plausibly represent 55%?	Not demonstrated publicly	Numerator, denominator, methodology and independent verification	
Can the 55% calculation be independently tested from the EPR?	No	Adequate non-confidential summary	

Key conclusion

Current public evidence supports that all 21 entities are AGWA members and that all or nearly all undertake some aluminium window or door fabrication. The 21 therefore do not constitute an independent or random sample of the whole Australian market. Their common membership does not disprove the 55% claim, but it makes disclosure of the selection method, membership list, legal entities, turnover bands and production data especially important. Public material still does not establish the FY2025 volume of qualifying like goods attributable to each entity or show that excluded products, services, licensee relationships and overlapping production were removed from the calculation.