



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: Marty O'Donnell / Thomas O'Donnell
Position in the company: Managing Director
Telephone: 03 9580 1474
E-mail address: Marty@odsglass.com.au / tom@odswindows.com.au
2. If you have appointed a representative, provide their contact details:
Name: Clinton Skeoch
Address: Suite 101b, 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")
Not Applicable.
4. Please provide the location of your company's production plant manufacturing aluminium windows and doors
22 Mills Rd Braeside VIC 3195
5. What is the legal name of your business?
ODS 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.
ODS Glass / ODS Commercial
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.

ODS Windows is a provider of high-quality aluminium windows for both residential and commercial buildings, specialising in luxury architectural homes, commercial spaces, and multi-level residences.

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Our selection of aluminium windows and doors are engineered to fit any space, enhancing its look and feel. We ensure that our windows and doors are accurately fitted to all dimensions, resulting in a sleek, impressive finish.

ODS Windows has been operating in Victoria since 2007, building strong relationships with many of Melbourne's top architects and builders. This has allowed us to work on a variety of prestigious projects, demonstrating our capability in both residential and commercial construction. Our experience in these markets is extensive, and we prioritise using materials sourced from local suppliers.

Our expertise is not just in providing windows but in offering products that are precisely made and durable, thanks to our commitment to using high-quality, locally-sourced materials. This approach supports the local economy and ensures our products meet our high standards.

ODS Windows is focused on delivering straightforward, effective window solutions. From the first meeting to the final installation, we aim for professionalism and customer satisfaction, making sure the final product exceeds our clients' expectations. Our team is equipped to handle any project, big or small, with the goal of enhancing your space with functional, elegant windows and doors.

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.

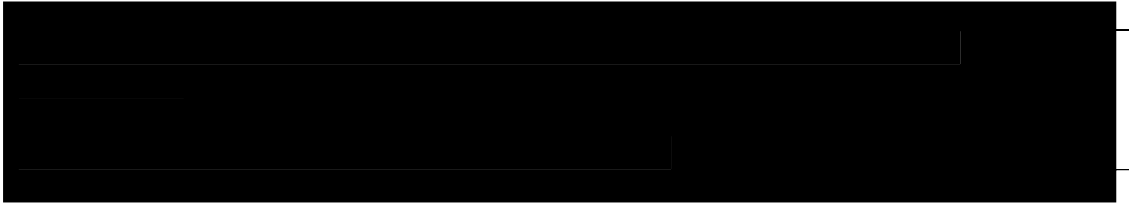
2. Please detail the products you produce as described in the above goods description. It may also be useful for you to provide a product brochure or catalogue.

ODS Windows designs, manufactures, supplies, and installs a comprehensive range of custom aluminium windows and doors, all produced in-house at its Melbourne facility using locally sourced aluminium extrusions and Australian-supplied glass.

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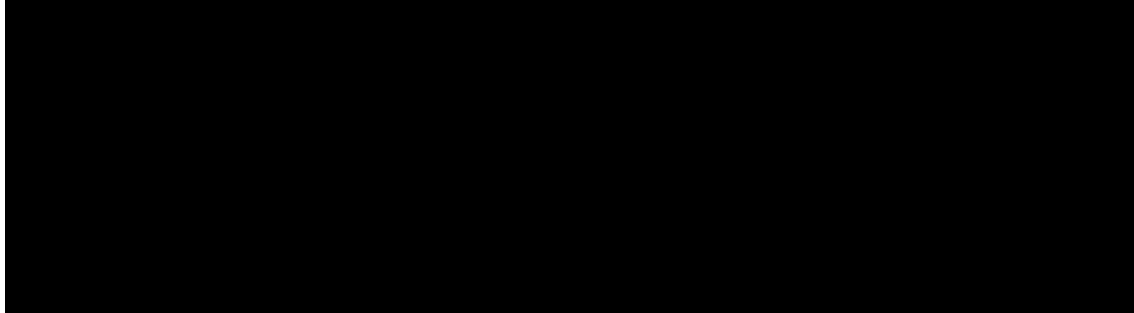
[REDACTED]



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

ODS Windows' main raw material inputs consist of aluminium extrusions, glass, and associated window and door hardware sourced from local suppliers.

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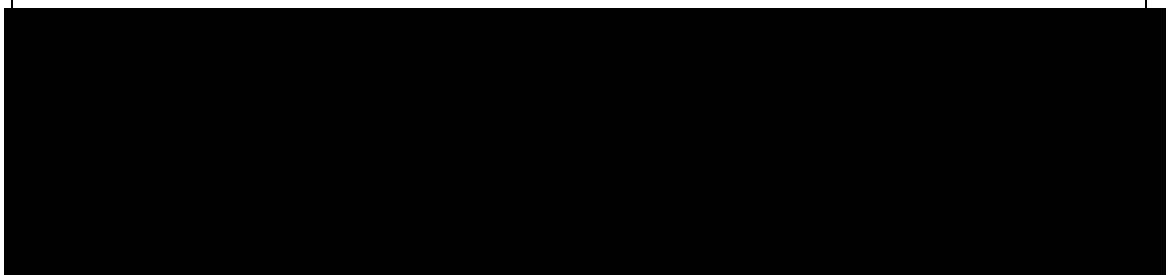
B-2 Products in the Australian market

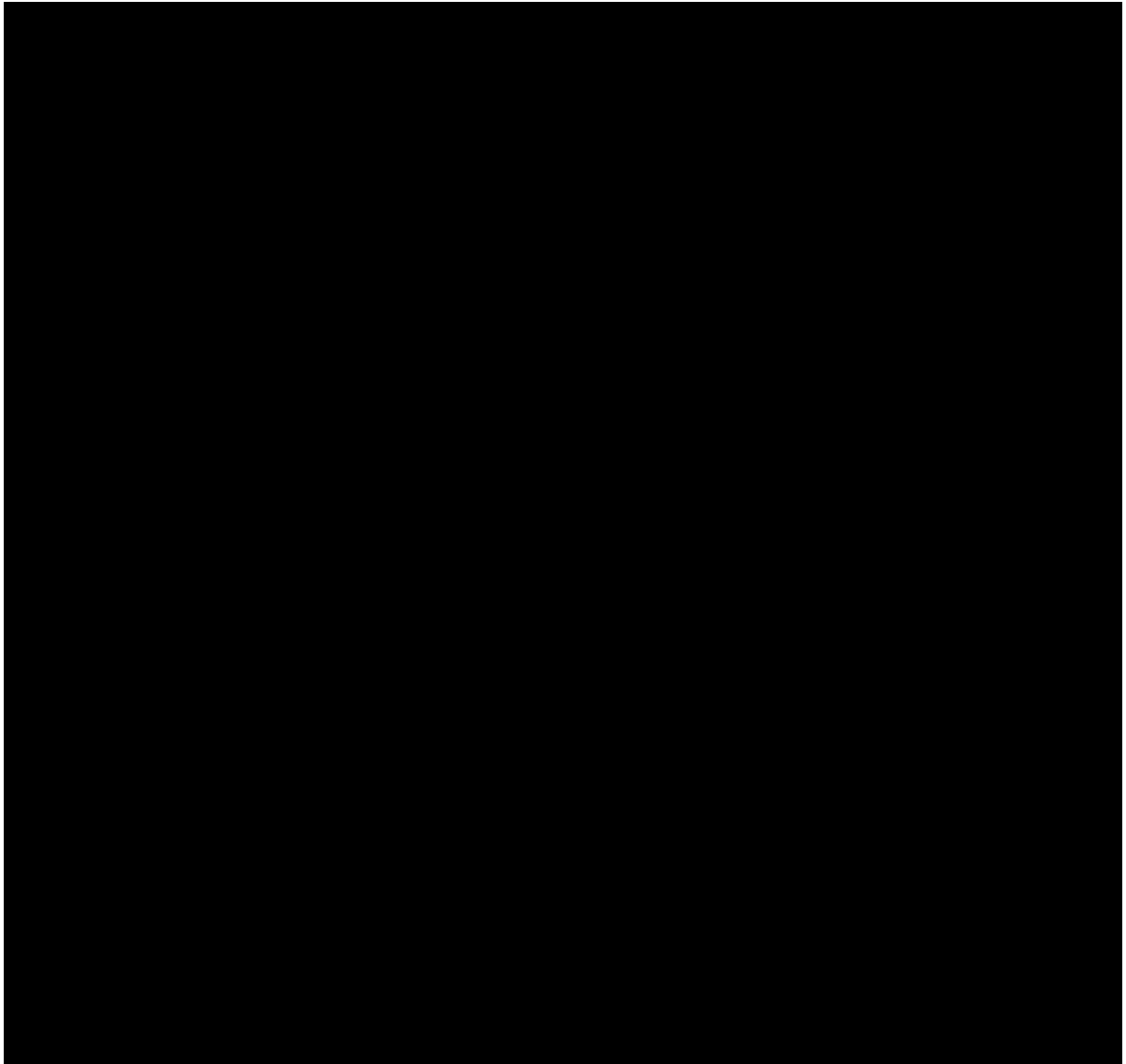
4. In relation to the Australian market for AWD, please outline:

- 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.

Demand for aluminium windows and doors in Australia generally follows residential and commercial construction activity. Seasonal cycles, broader economic conditions, and regulatory or technology changes influence overall demand levels. Work is mainly concentrated in metropolitan areas, with some regional and interstate activity. The market is segmented by geography and by product type, with high-end residential and low-rise commercial being the main areas of focus. Imported products primarily compete on price, and despite quality concerns, they remain widely used.

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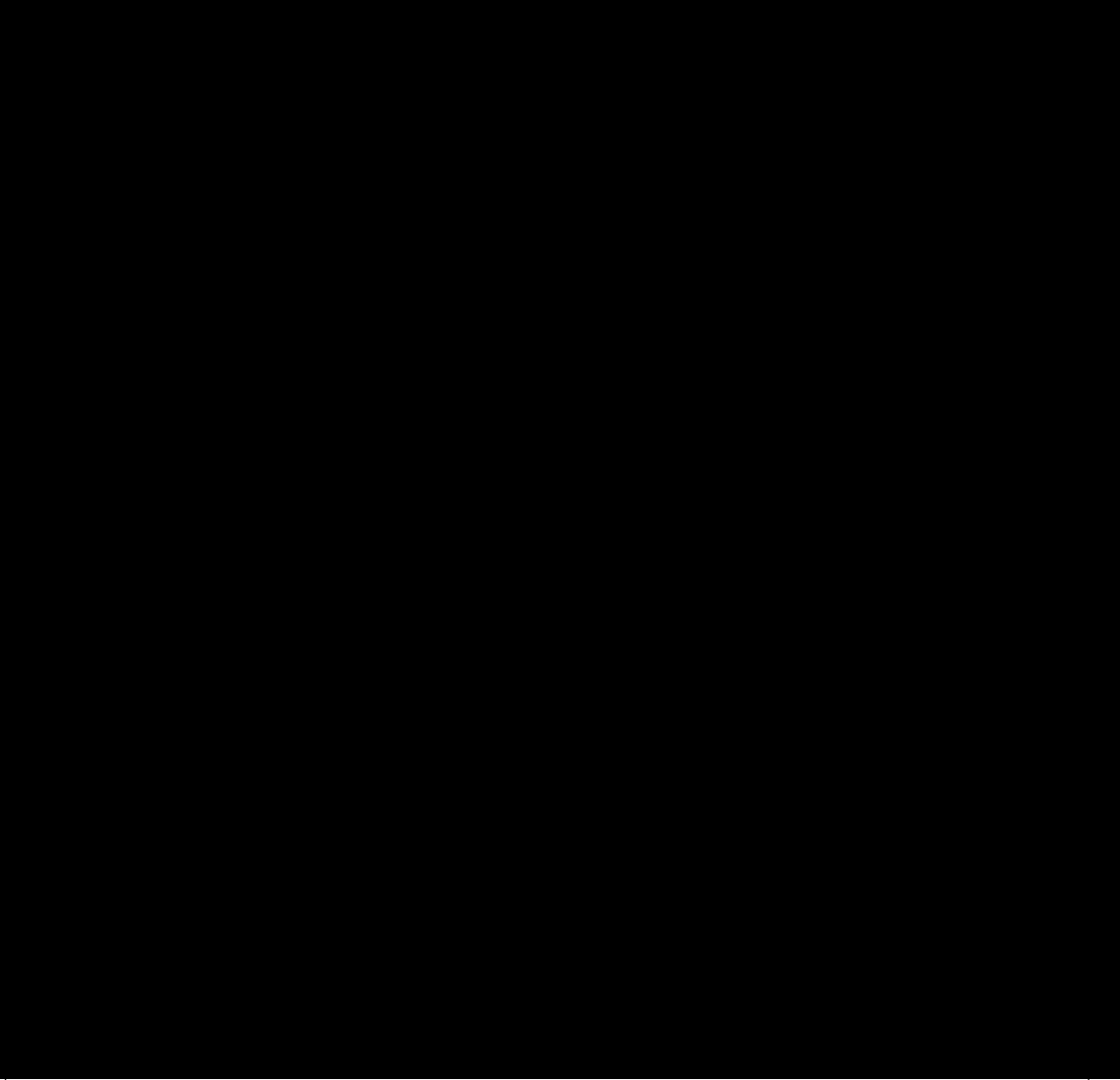




5. In relation to the range of AWD offered for sale in the Australian market, please outline:
- sources and availability of supply
 - product range or specification differences between Australian-manufactured and overseas-supplied goods:
 - any actual or perceived quality differences between Australian manufactured and overseas supplied goods
 - any actual or perceived price differences between Australian manufactured and overseas supplied goods.

The supply of aluminium windows and doors in Australia generally comes from established local manufacturers using locally sourced materials, alongside a growing number of imported fully fabricated products. Both local and imported supply are readily available. Australian manufacturers provide a wide range of systems designed to meet Australian Standards, while imported products offer similar configurations, though their specifications and compliance can vary. In general, locally made products tend to show more consistent quality, while imported products can be more variable. The main difference between the two is price, with imported products often significantly and unexplainably cheaper.

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

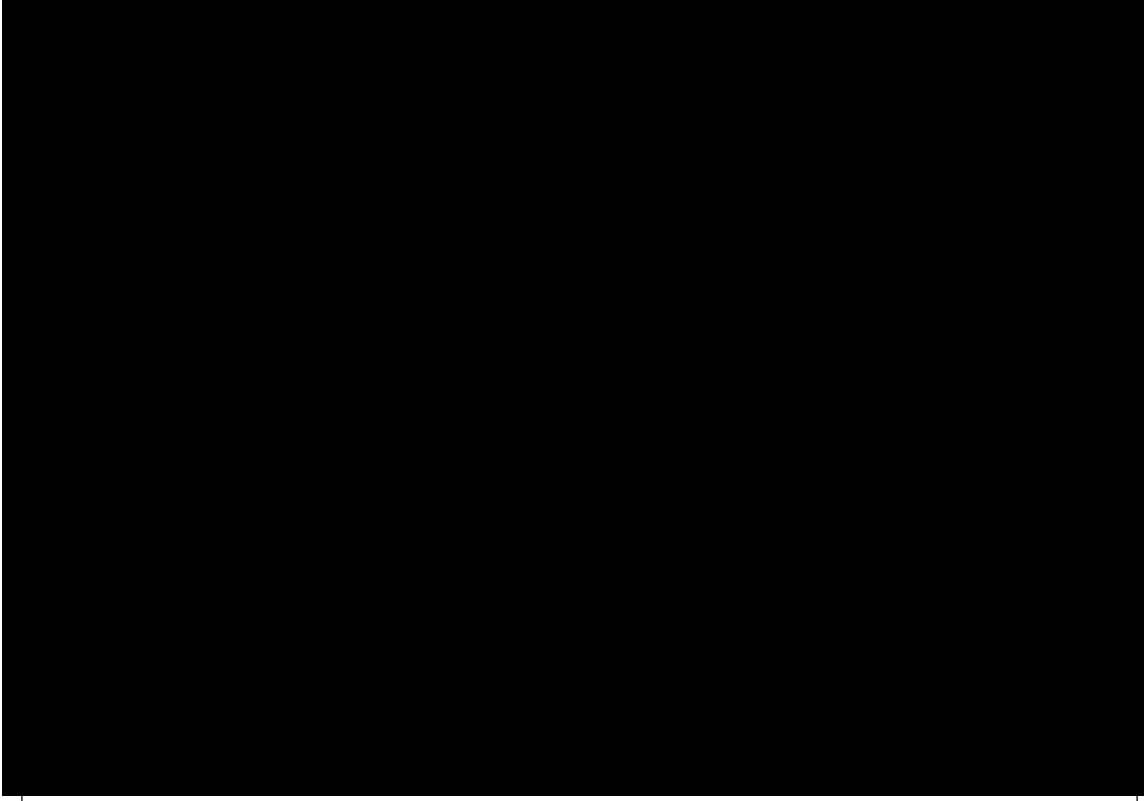
- consumer preferences for the goods, (e.g. new products within the goods description, new substitute products, preference for Australian produced over imported goods)
- availability of supply to the Australian market (e.g. new participants)
- ability of Australian industry to supply (e.g. product range, timeliness, limits on production capacity)
- conditions of competition for the goods.

Over the past five years, consumer preferences have shifted toward larger window and door sizes, modern designs, and higher-performing glazing driven partly by updated energy requirements. Activity in the mid-rise apartment sector has declined, while higher-end residential work has remained more stable. Local suppliers of aluminium systems and glass continue to provide reliable supply, but there has been

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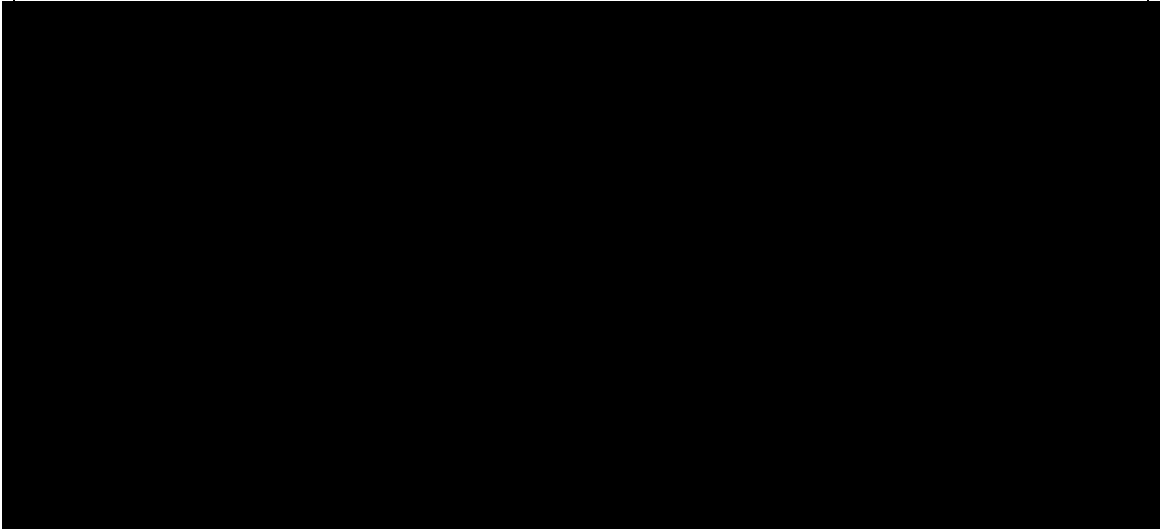
noticeable growth in imported fully fabricated window and door systems, particularly for mid-rise and larger projects. Australian manufacturers are still able to supply the full range of required products and generally have sufficient capacity, but increasing import competition—especially on price—has limited their participation in some market segments.

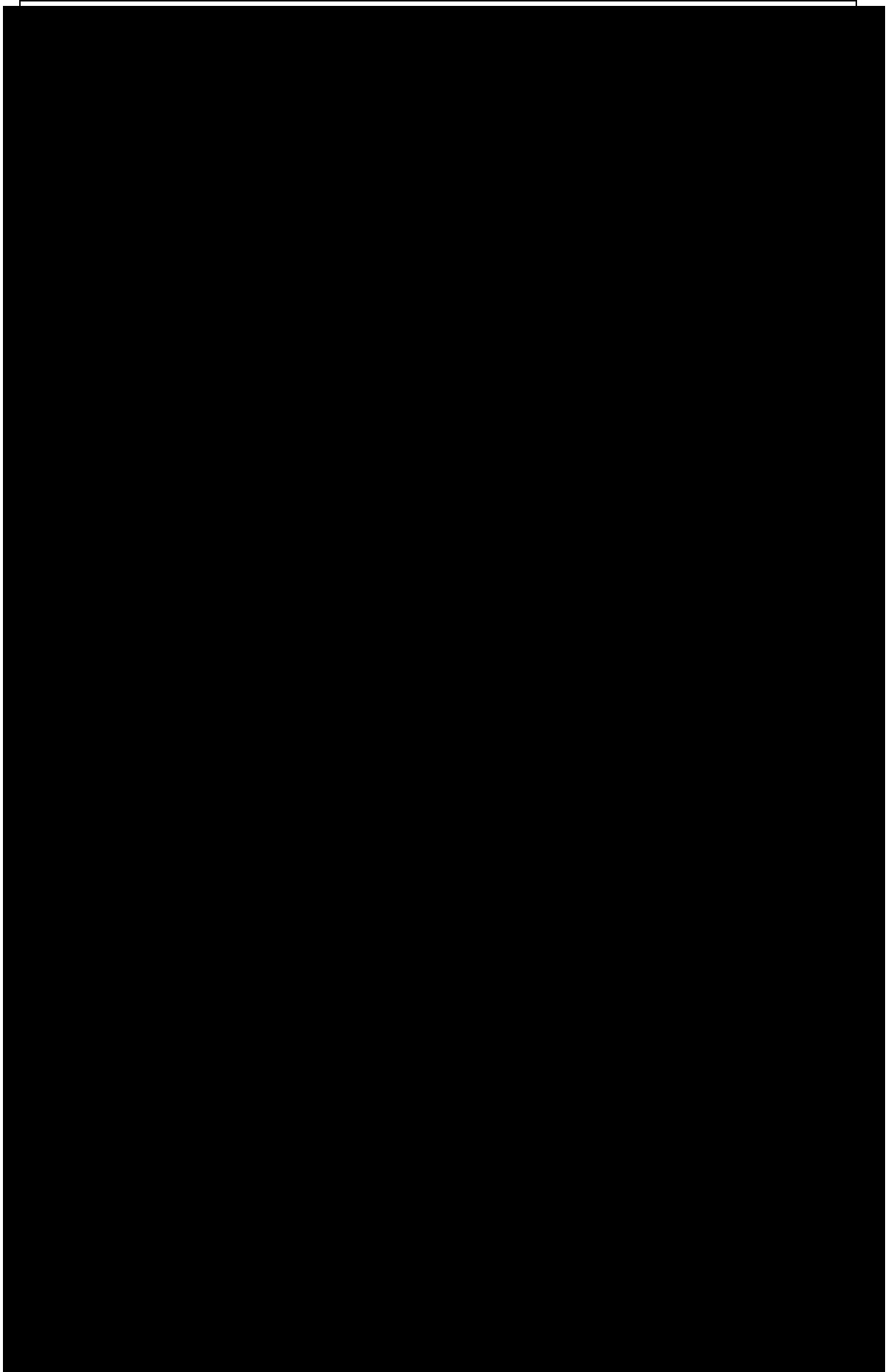
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7. Considering your responses to Q6 above, how have these changes impacted your business, specifically in the period from FY2022 to FY2025?

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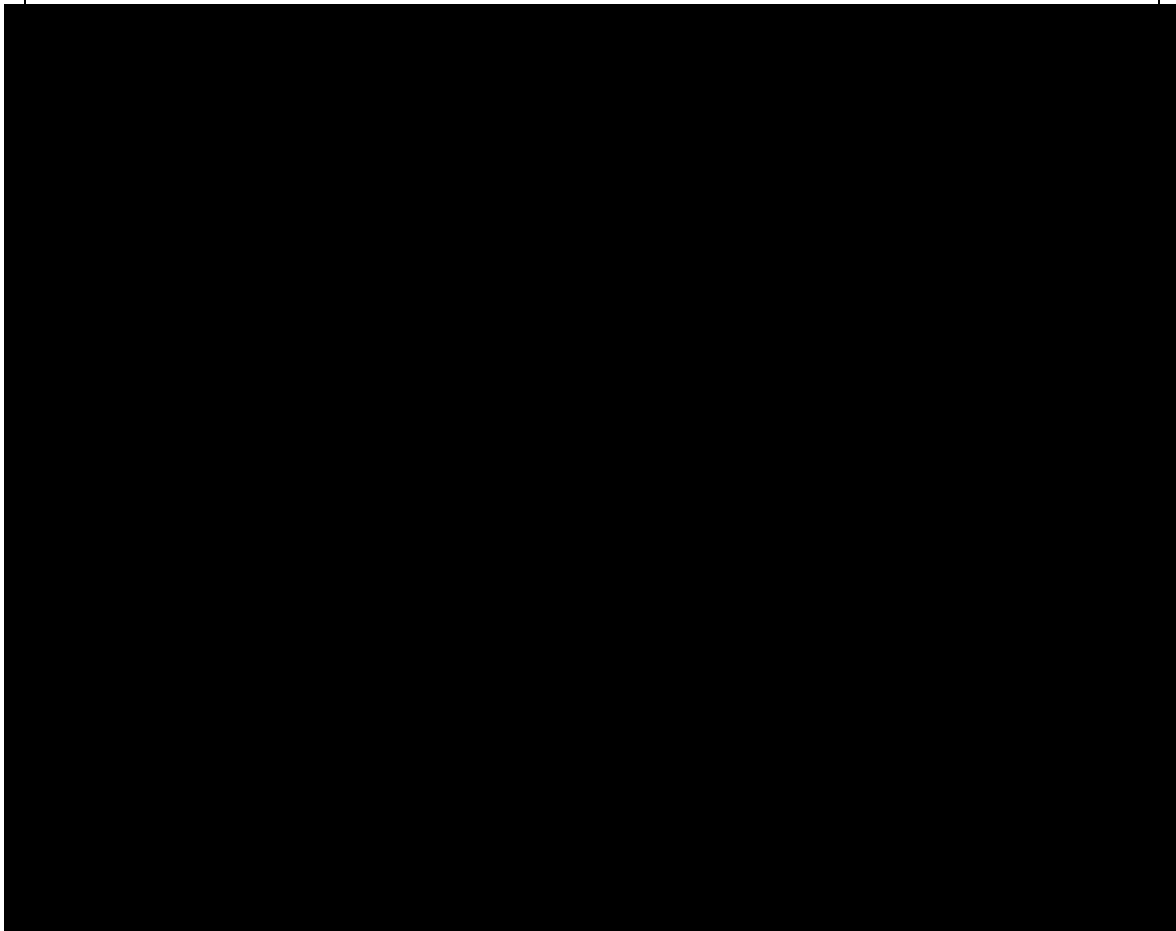


8. Do you anticipate any changes to the Australian market for AWD in the **next five years**? In your response, please comment on:

- the short and medium-term outlook for the Australian industry
- any anticipated changes to demand and/or supply
- any anticipated changes to the conditions of the Australian market for AWD

Looking ahead, I think the Australian window market will mostly stay on the same track unless something changes with imports. In the short to medium term, local manufacturers like us still have the skills and the capacity to supply whatever the market needs, but we'll stay under pressure in areas where imports dominate. I expect some of our residential work to hold steady, but I don't see the mid-rise market coming back to Australian suppliers without some kind of shift in the market. Imported, fully-fabricated systems will likely keep increasing because of price and their increasing access. Overall, competition will stay tough, with pricing continuing to favour imports, and that will keep putting pressure on businesses like ours that have to follow local standards and rely on Australian labour.

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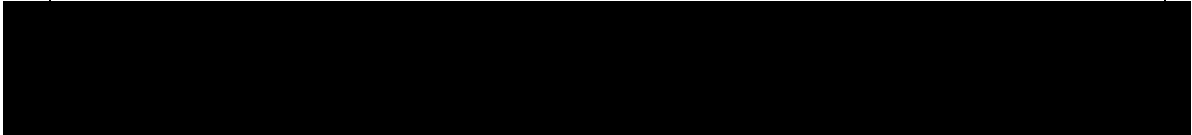




9. Who do you consider to be the price leader for AWD in the Australian market?

Imports

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C Goods produced and sold by your company

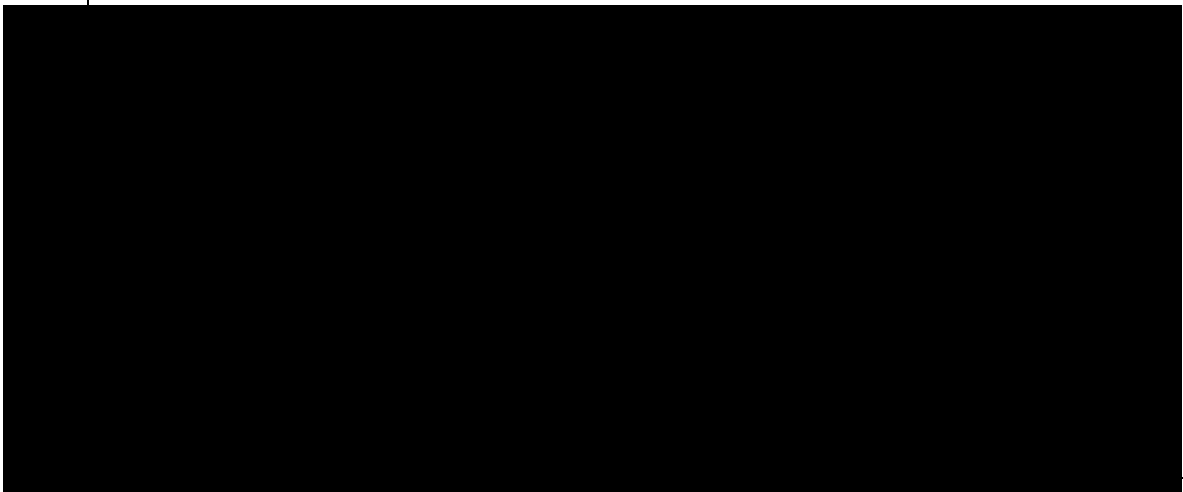
10. Are the goods generally sold as individual items (i.e. singular window or singular door) or on a project/tender basis?

From our point of view, we generally sell windows and doors on a project or tender basis, not as one-off individual items. Almost all of our work comes through full project quotes, whether that's a residential home, a commercial job, or a larger builder package. We don't really operate as a "single-window retailer" everything we do is measured, specified, and priced as part of a broader job.

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

We determine our prices by adding up material and labour costs, covering our overheads, and applying a margin that reflects the risk and terms of each job.

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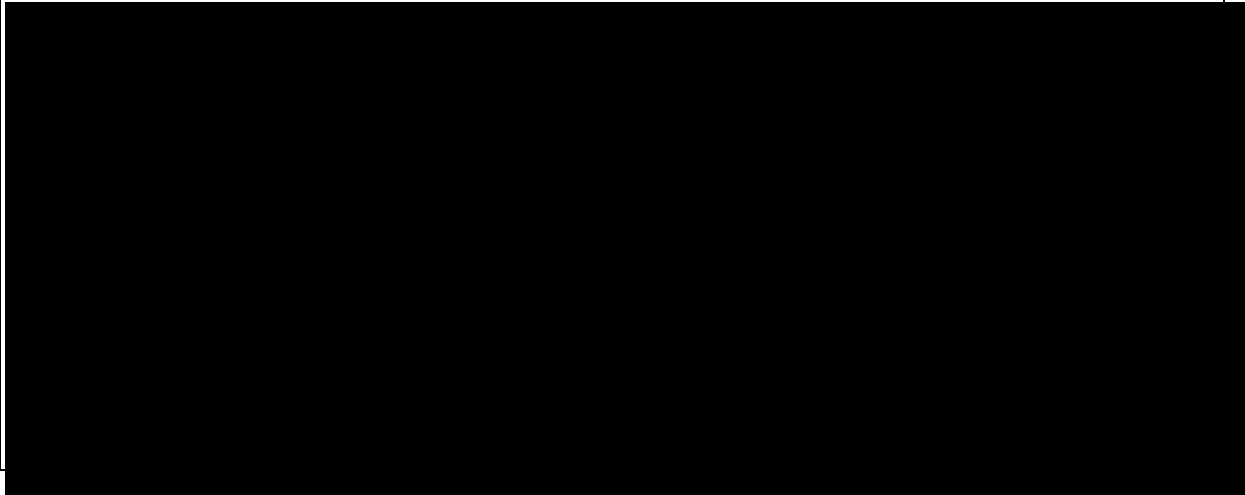
12. Please rank the following factors in terms of their influence on your pricing decisions, with the most important factor ranked first (1) and the least (13) important factor ranked last.

- 4 - Purchase price of raw materials
- 1 - Competitors' prices
- 3 - Cost to make and sell the goods
- 11 - Level of inventory
- 12 - Value of the order
- 2 - Volume of the order
- 5 - Value of forward orders
- 6 - Volume of forward orders
- 7 - Customer relationship management
- 8 - Supplier relationship management
- 9 - Desired profit
- 10 - Brand attributes
- 13 - risk in client company financial sustainability

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?

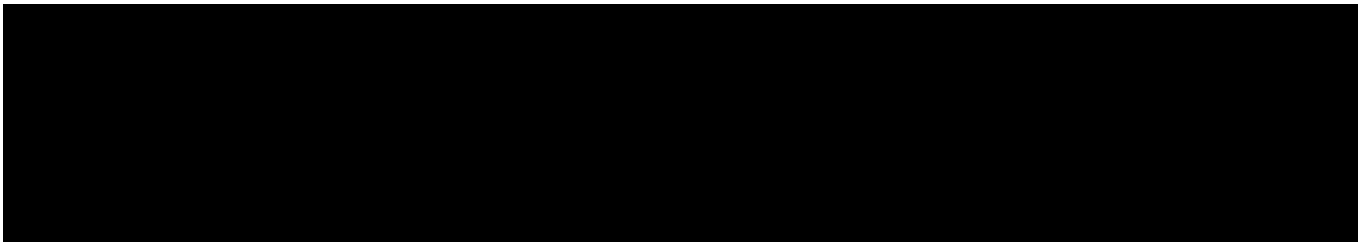
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E Certification

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



Date: 27/1