



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: TBD

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	15
E CERTIFICATION	15
SIGNATURE:	15
NAME:	15
POSITION:	15
CONTACT NUMBER:	15
DATE:.....	15

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: Hugh Lockie
Position in the company: Managing Director
Telephone: 03 97290411
E-mail address: HughL@SpectiveGroup.com.au

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

3 Ramage St Bayswater, Vic, 3153

4. What is the legal name of your business?

Spective Group Pty Ltd

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

No

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

IND Window fabrications Pty Ltd.

7. 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.

We are an integrated team of expert designers, engineers, manufacturers, installers and project managers..

Our client portfolio includes all major Australian commercial construction companies.

The products we manufacture and sell range from facades to windows, claddings, steel and other custom building products.

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.*

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Exclusions

Excluded are curtain wall products.

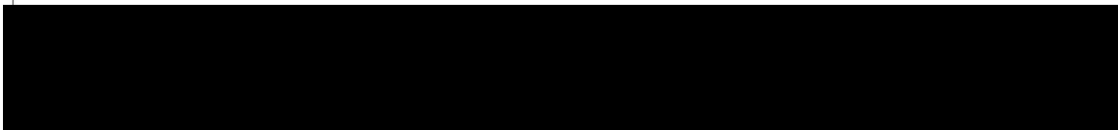
2. Please detail the products you produce as described in the above goods description. It may also be useful for you to provide a product brochure or catalogue.

We design, manufacture and install aluminium windows and doors as well as window wall systems that fall within the goods description for this case. Our offer focuses on bespoke, commercial-grade solutions for non-residential buildings, often packaged with curtain wall and cladding as part of a broader building-envelope scope (noting that curtain wall is excluded from the goods definition, though it is frequently delivered alongside windows and doors in our projects).

We operate a mixed systems model: we have proprietary structurally glazed framing systems and, where appropriate, procure system components to meet project requirements.

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

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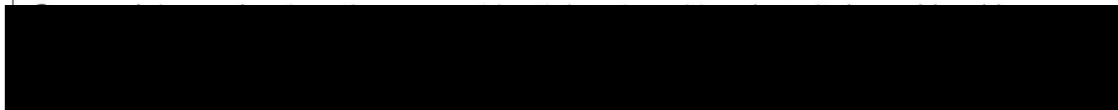
B-2 Products in the Australian market

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

- sources of demand for AWD

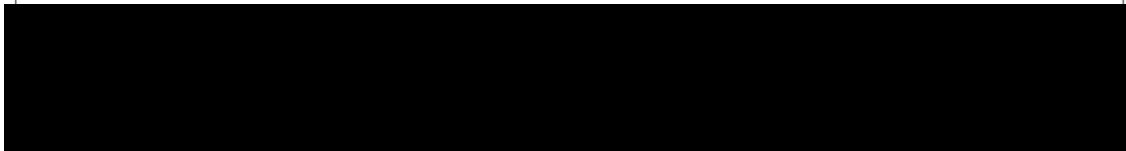
For us, demand is from the commercial and institutional market.

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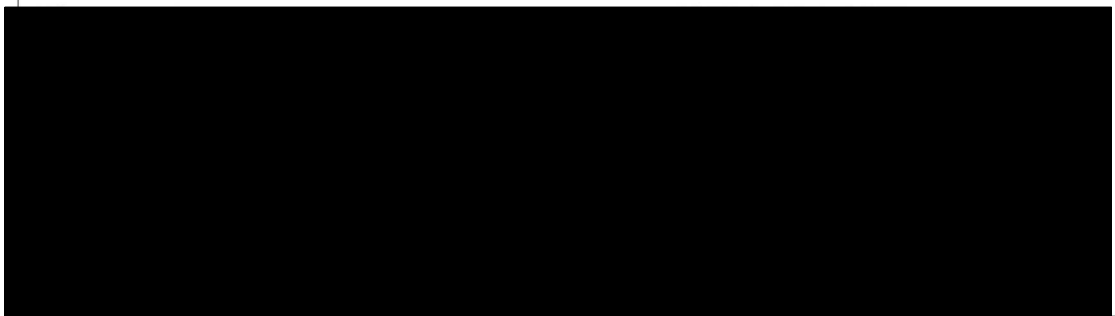
- causes of demand variability (e.g. seasonal fluctuations, factors contributing to overall market growth or decline, government regulation, or developments in technology affecting either demand or production)

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

Confidential:



- the way in which the imported and Australian manufactured AWD compete
On price,

Confidential:



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

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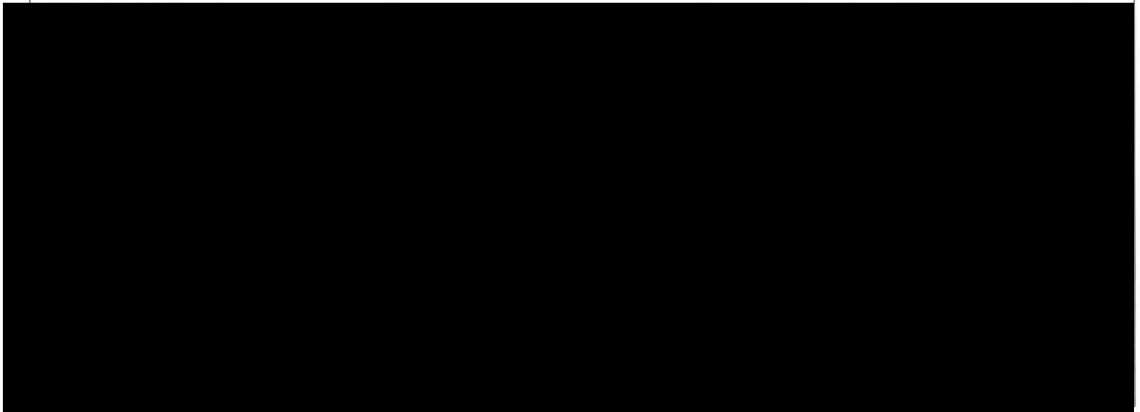


5. In relation to the range of AWD offered for sale in the Australian market, please outline:

- 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.

While in the world stage, Australia is a relatively small market, the reality is that all the finished windows Door and facade products we need are here or can be customised or developed as we do for clients.

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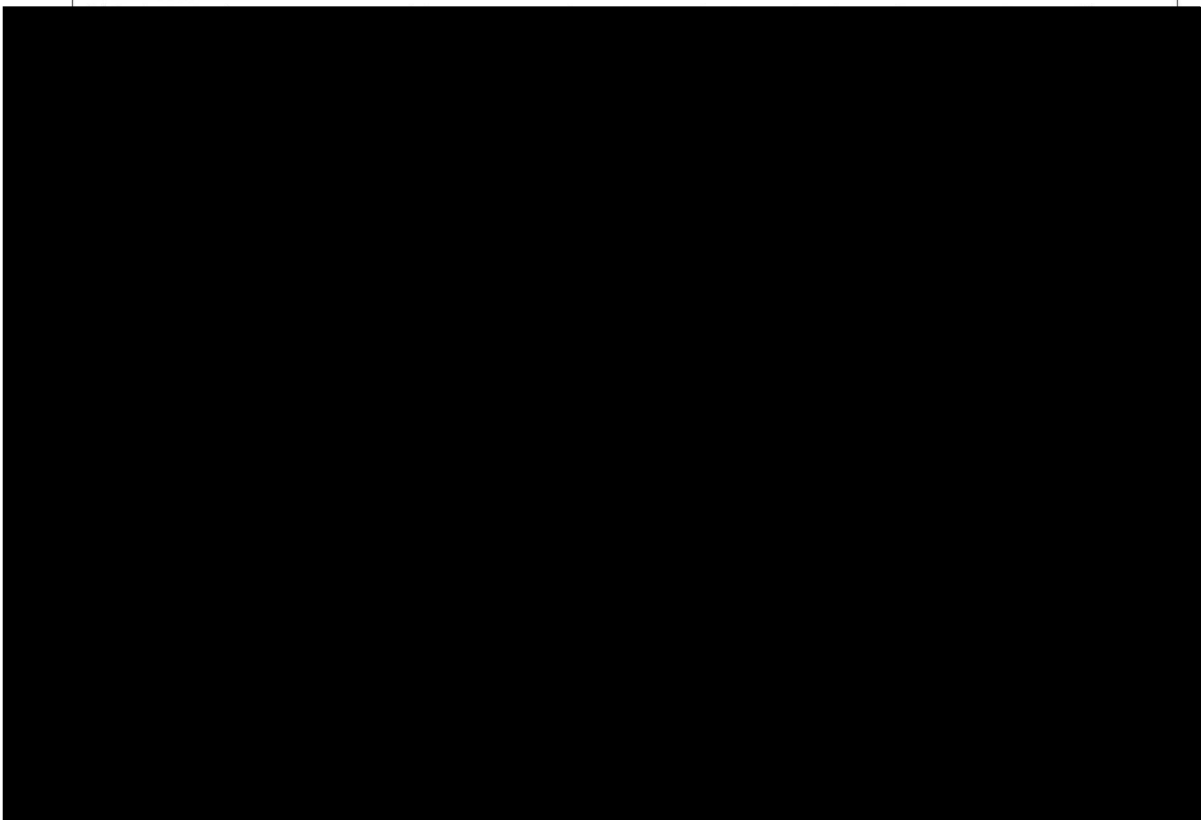


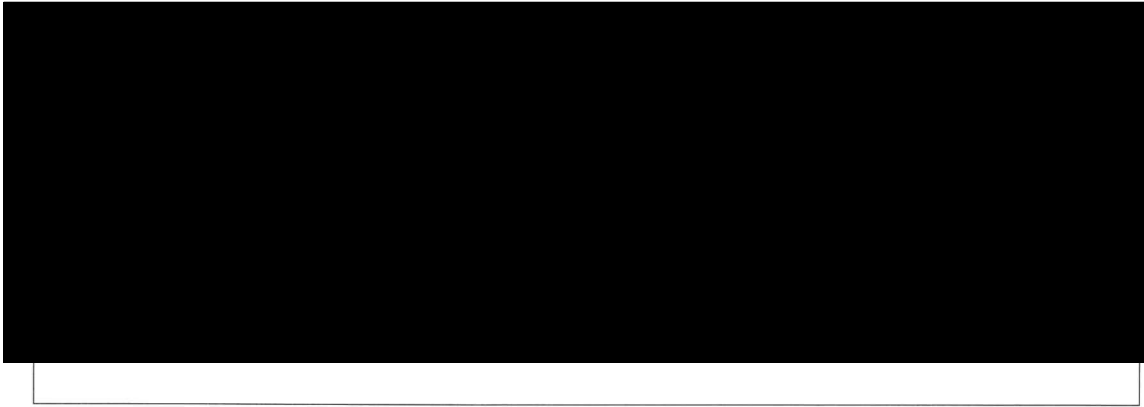
6. In the **last five years**, have there been any notable changes in:

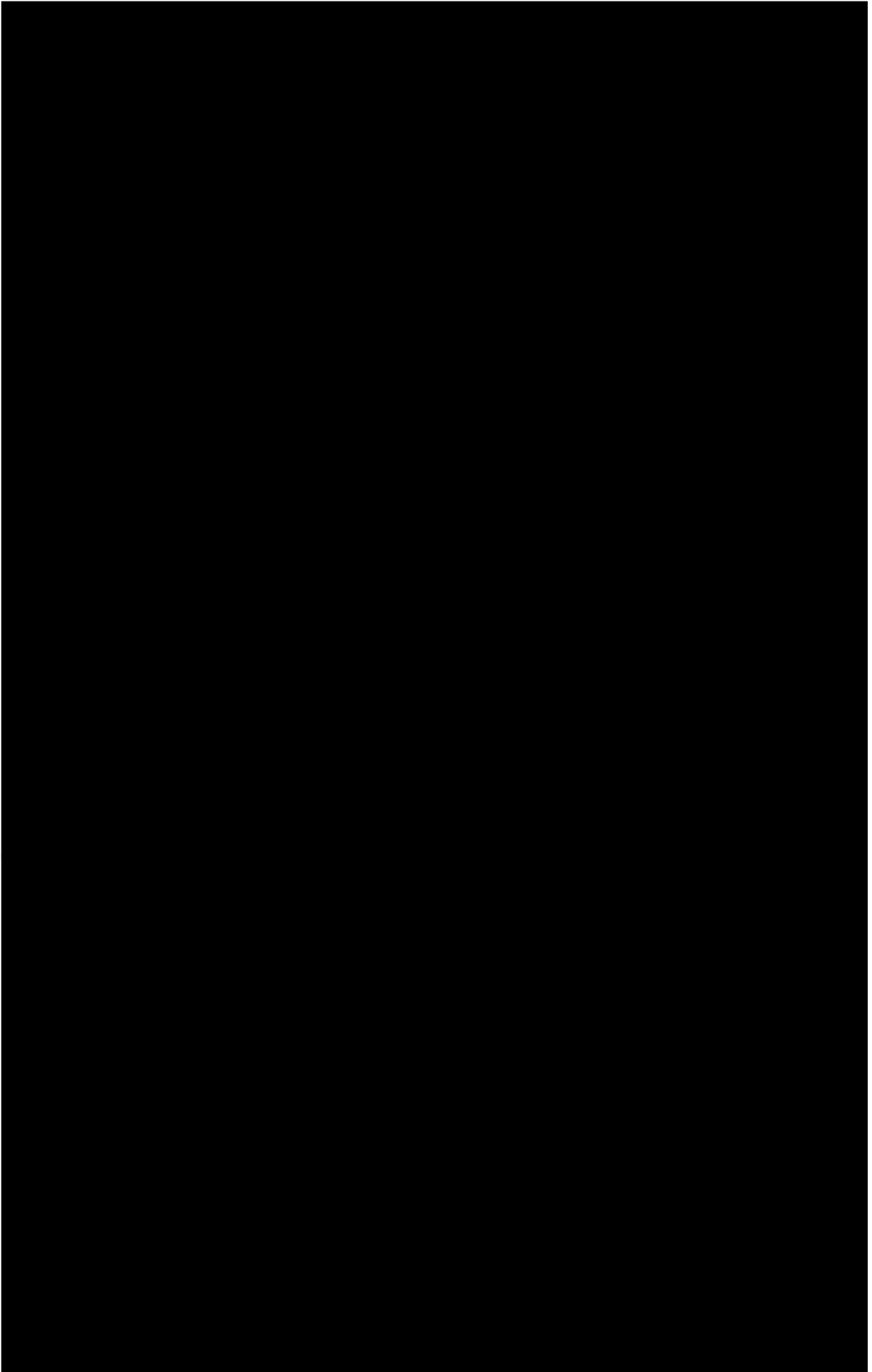
- consumer preferences for the goods, (e.g. new products within the goods description, new substitute products, preference for Australian produced over imported goods)
- availability of supply to the Australian market (e.g. new participants)
- ability of Australian industry to supply (e.g. product range,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

It is getting more competitive and there are fewer fabricators in the segments we play in.

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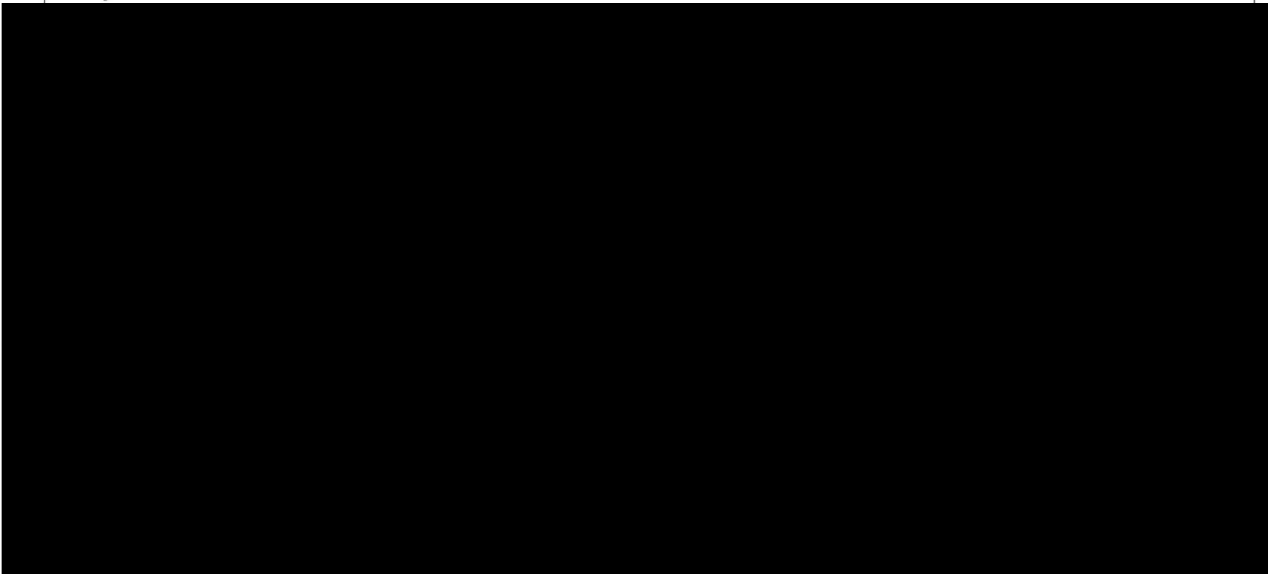






7. Considering your responses to Q8 above, how have these changes impacted your business, specifically in the period from FY2022 to FY2025?

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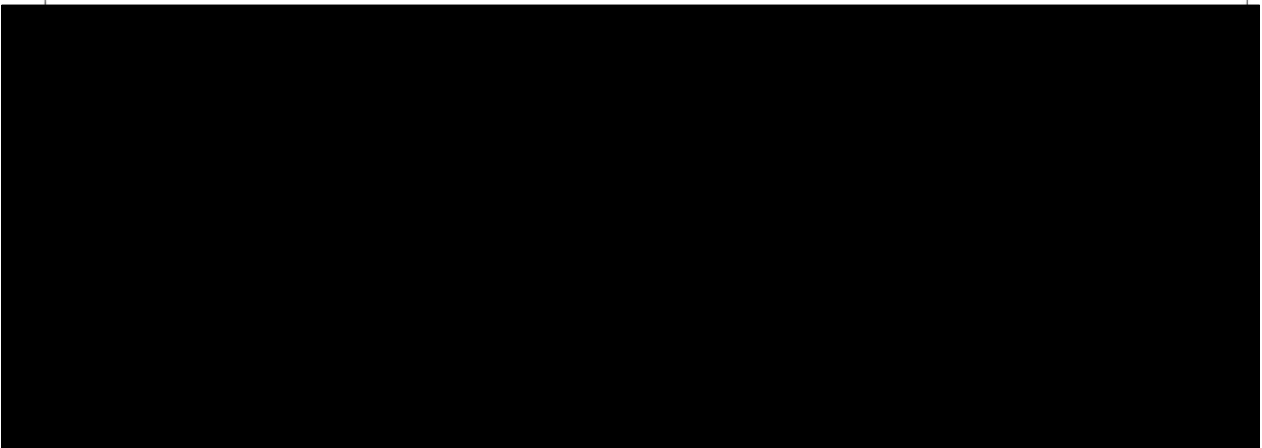


8. Do you anticipate any changes to the Australian market for AWD in the **next five years**? In your response, please comment on:

- 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

Overall, I see a stable market, increasingly challenged by imports.

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

In our commercial tender-type market, the lowest price is almost usually an overseas (Chinese-based) fabricator, and frequently a different name each time.

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?

We primarily sell on a project/tender basis.

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

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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.

- 9. Competitors' prices
- 2. Purchase price of raw materials
- 1. Cost to make and sell the goods
- 13. Level of inventory
- 5. Value of the order
- 6. Volume of the order
- 11. Value of forward orders
- 12. Volume of forward orders
- 7. Customer relationship management
- 8. Supplier relationship management
- 3. Desired profit
- 10. Brand attributes
- 4. Client (will they be able to pay, will they be good to work for)

D Additional information or comments

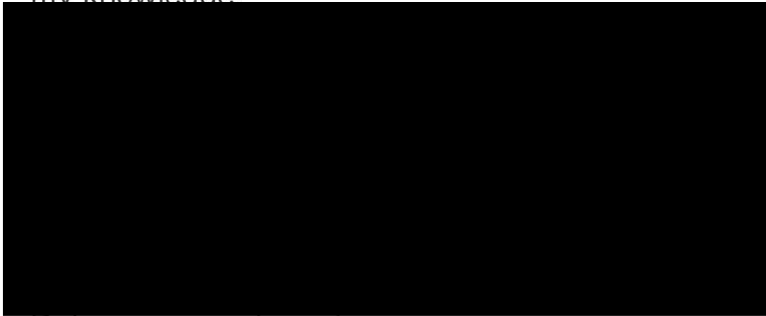
Please add any comments in relation to the investigation, particularly in relation to the applicant's claims of injury caused by allegedly dumped and subsidised imports from China?

We are concerned that imports of fully fabricated windows are frequently priced at levels that do not reflect underlying material and freight economics. This activity compresses margins, discourages reinvestment, and reduces the number of Australian fabricators active in our segment.

Despite that, our company has quietly and deliberately adapted, Ultimately we are not asking for protection from competition—only a level playing field. Given the prices we increasingly observe, anti-dumping measures would help the Australian fabrication sector, restore confidence to invest, support capacity growth, and ensure the Australian market continues to have credible local choices for windows, doors and façades.

E Certification

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



Date: 23/1/2026