



Australian Government
**Department of Industry,
Science and Resources**

OFFICIAL: Sensitive

**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: ASAP

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 understanding 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: Peter Terpstra

Position in the company: Managing Director.

Telephone: +618 9492 1200

E-mail address: admin@com-al.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. Please provide the location of your company's production plant manufacturing aluminium windows and doors
16 Madrid Pl, Maddington WA 6109, Australia

4. What is the legal name of your business?

Com-Al Windows 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.

no

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.

Com-al is a Western Commercial window and door business with a 57-year operating heritage in the Western Australian market. We design, manufacture (local fabrication), and install commercial aluminium window and door systems across all building classes.



1. The goods the subject of the application (the goods) are:

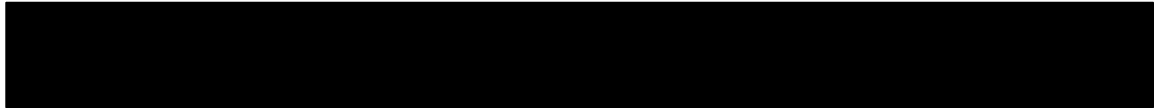
- *for window assemblies or partial assemblies (including window frames, panels and sashes), up to and including 3.0 metres high and up to and including 4.0 metres wide; and*
- *for door assemblies or partial assemblies (including door frames, panels and sashes), up to and including 3.0 metres high and up to and including 7.0 metres wide.*

- “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.

Excluded are curtain wall products.

- We produce all window types in the goods description; all our windows are fabricated locally using our own proprietary window systems (www.com-al.com.au/) or those of leading window system suppliers, as specified.

[illegible]



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

We source a combination of local and overseas materials depending on the project type, lead time, and specifications.

Confidential:



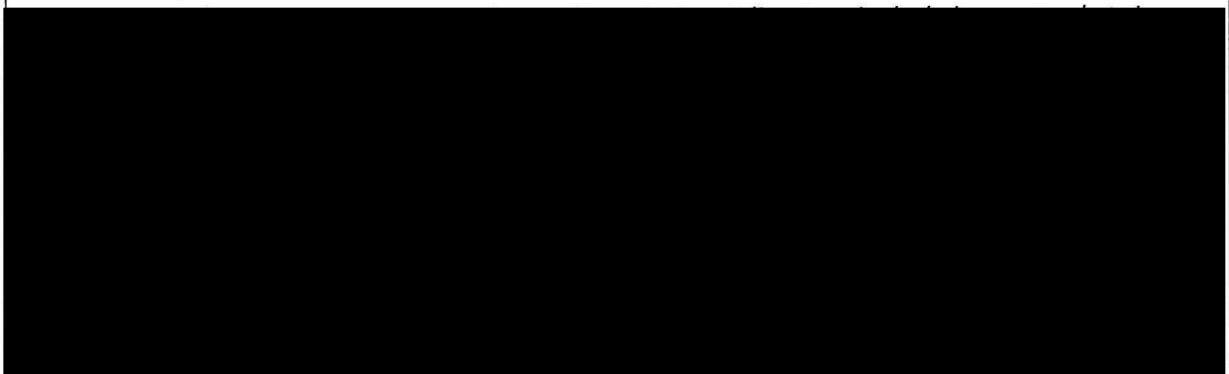
B-2 Products in the Australian market

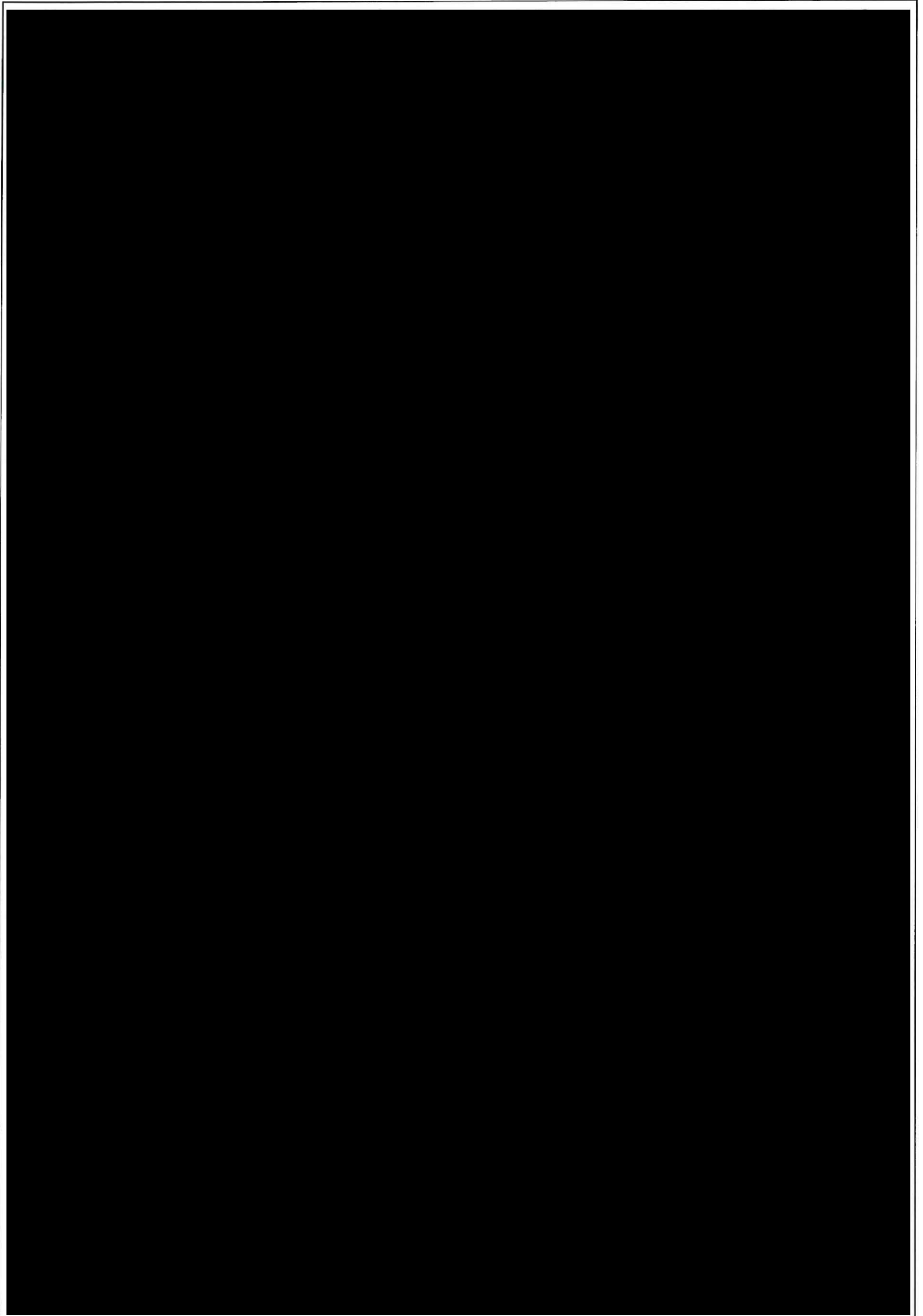
4. In relation to the Australian market for AWD, please outline:

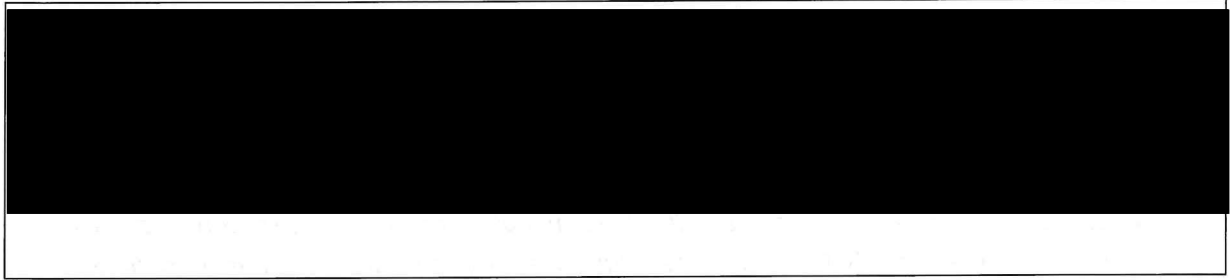
- sources of demand for AWD
- causes of demand variability (e.g. seasonal fluctuations, factors contributing to overall market growth or decline, government regulation, or developments in technology affecting either demand or production)
- the presence of market segmentation, such as geographic or product 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.

There are many sources of demand in WA, our markets are driven by government spending, commercial investment and residential consumer confidence, with key sub-markets each having their own risk profile, demand drivers and project requirements.

Confidentially:



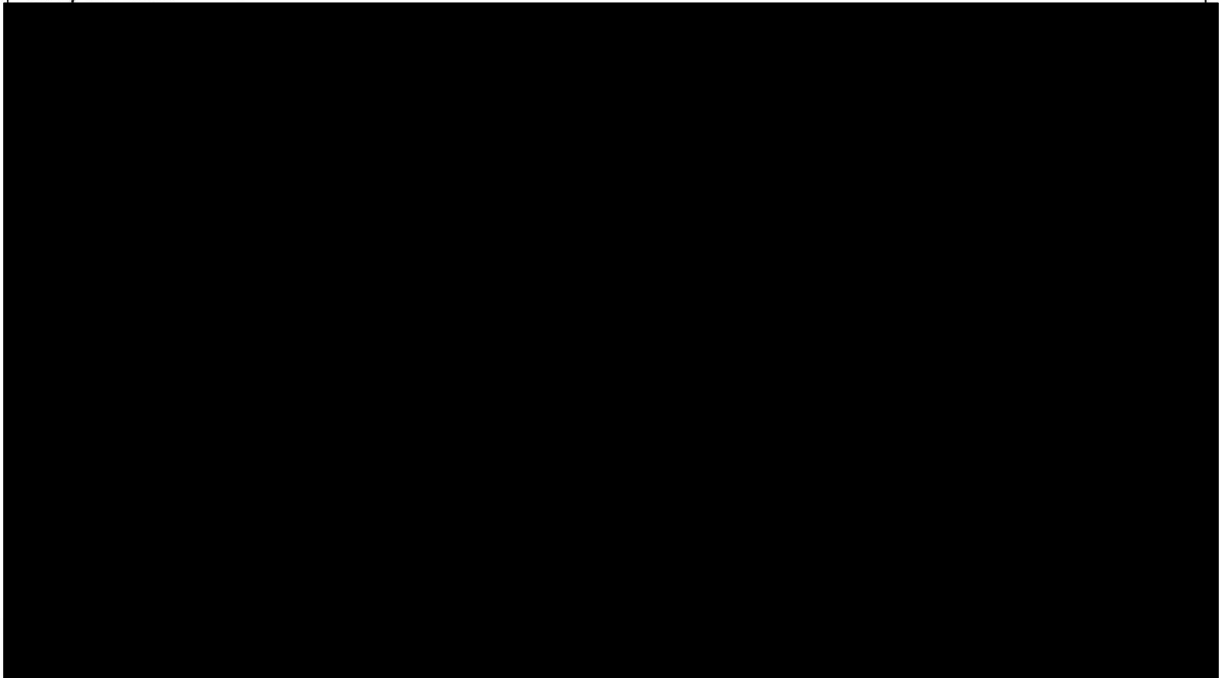




5. In relation to the range of AWD offered for sale in the Australian market, please outline:
- sources and availability of supply
 - product range or specification differences between Australian manufactured and overseas supplied goods
 - any actual or perceived quality differences between Australian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

The Australian aluminium window and door market today is supplied through a mix of local manufacturing and a growing presence of imported finished products. Local producers continue to offer a wide range of commercial and residential systems and remain capable of meeting most project requirements a designer can dream up, while imports—particularly from Asia—have become more prominent due to cost advantages. Overseas products have nonetheless expanded share in the market and influenced pricing and product choices. Despite this shift, Australian manufacturers continue to compete strongly on quality, engineering capability and compliance with local standards.

Confidential:



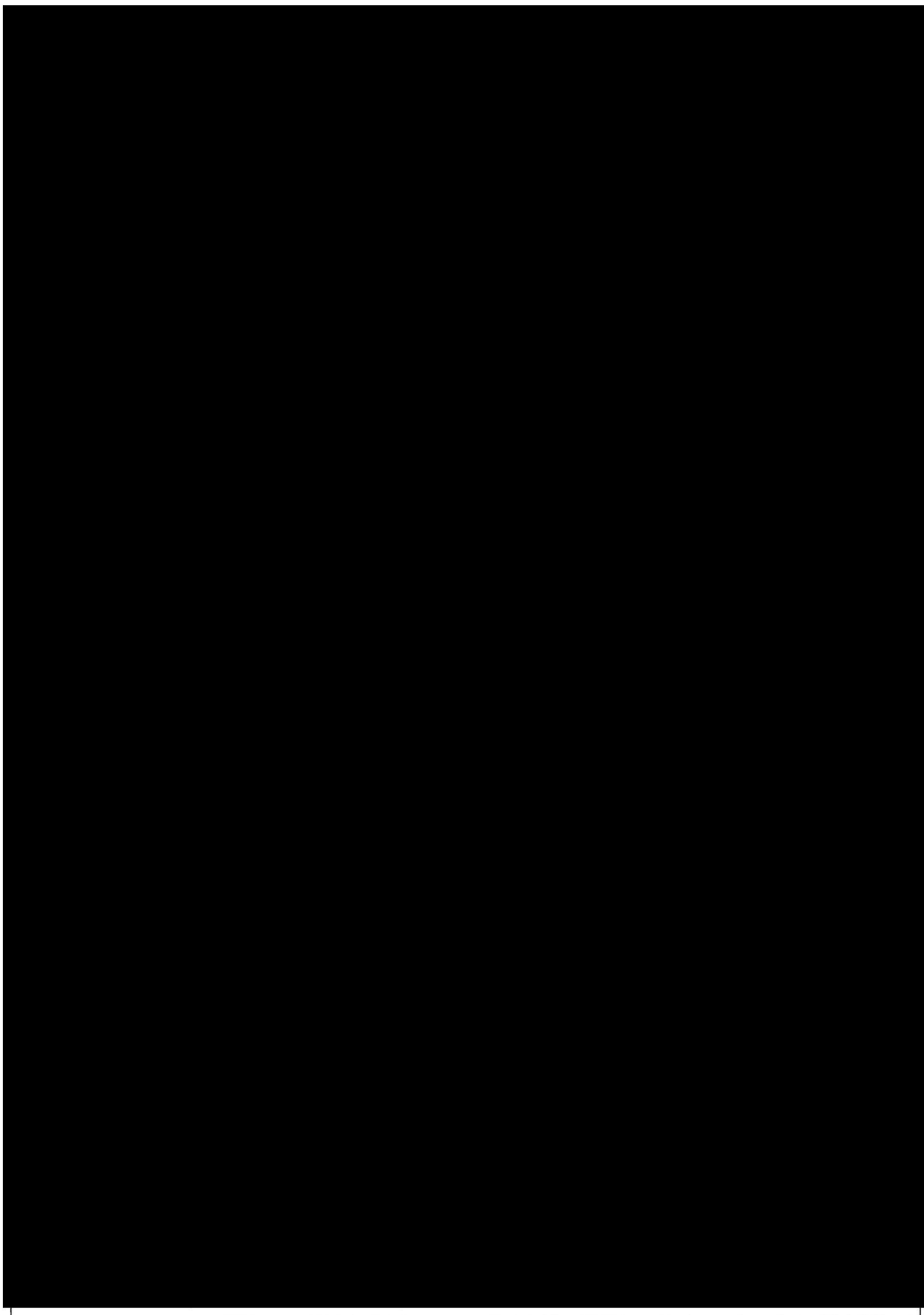


6. In the **last five years**, have there been any notable changes in:

- 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.

Over the past five years, the Western Australian aluminium window and door market has evolved significantly, with consumers increasingly favouring larger, higher-performing and more technically complex products, while the supply landscape has shifted due to the rapid growth of import-only suppliers bringing in fully fabricated systems from overseas.

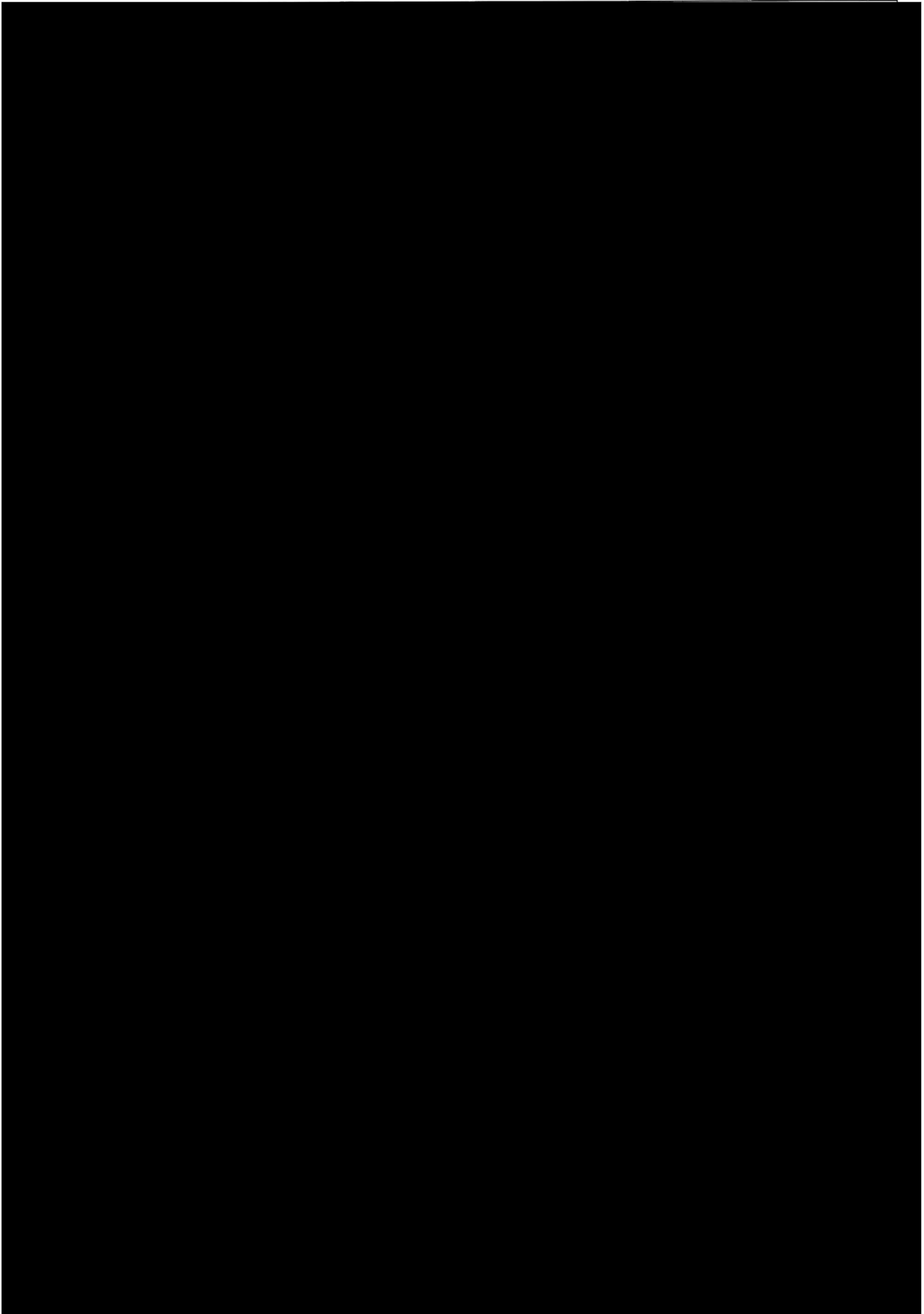
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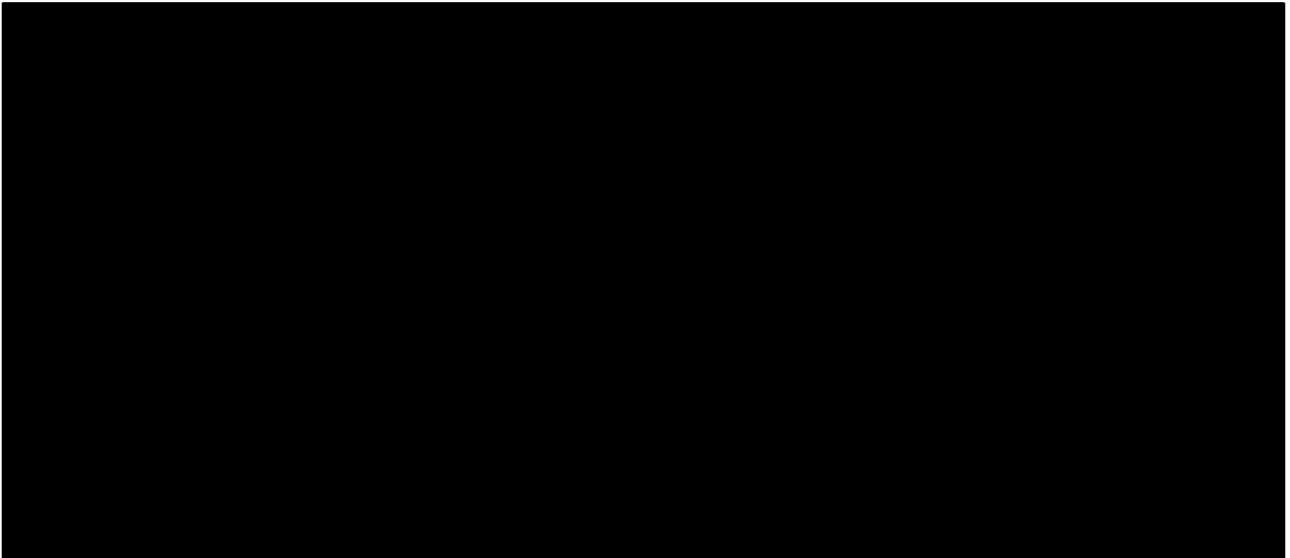


7. Considering your responses to Q8 above, how have these changes impacted your business, specifically in the period from FY2022 to FY2025?

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Over the past several years, these changes have had an impact on what we do and how we do it.

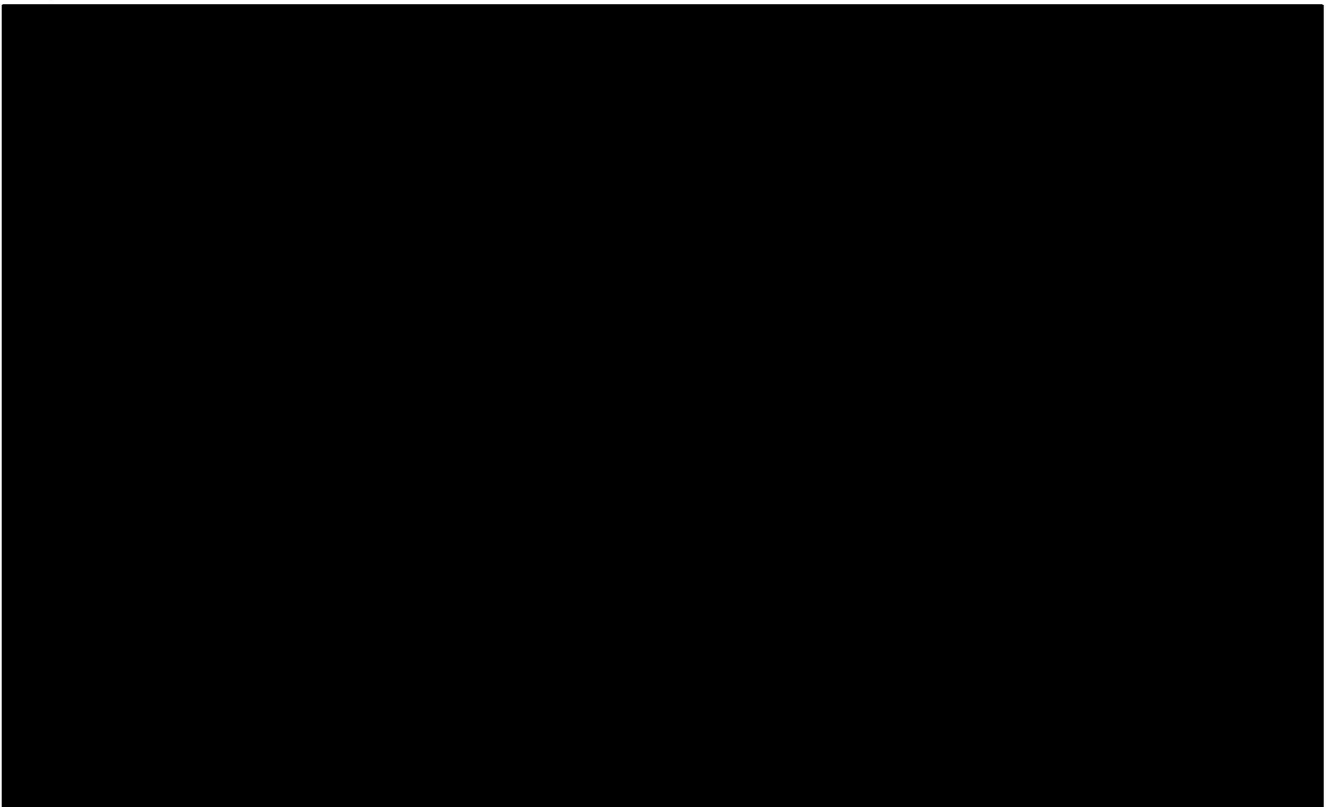




8. Do you anticipate any changes to the Australian market for AWD in the **next five years**? In your response, please comment on:

- 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 over the next five years, I am confident Western Australia will remain strong in terms of underlying demand; however, in the absence of action, it will become increasingly challenging for the local manufacturing industry.



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

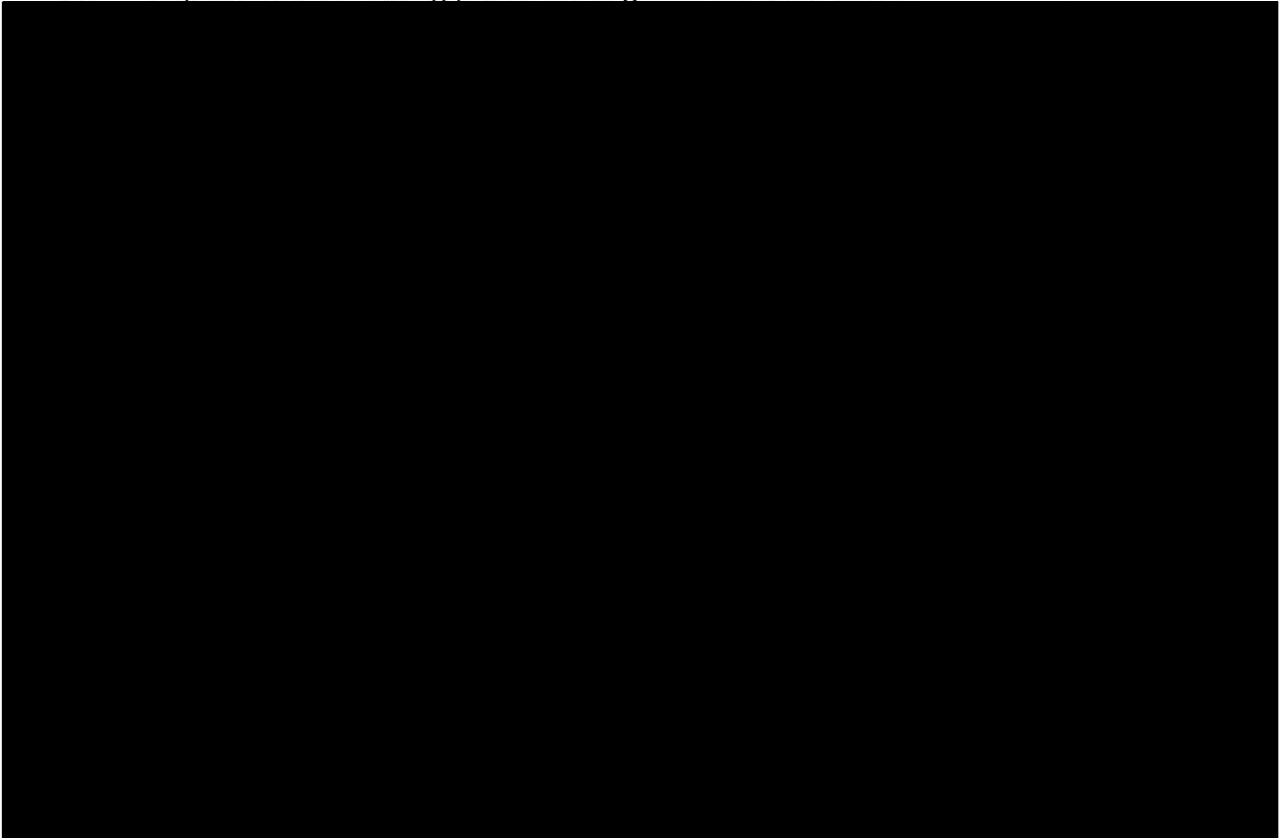
Imports!

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?

All our sales are done by Quote or tender.

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



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.

- Competitors' prices
- Purchase price of raw materials
- Cost to make and sell the goods
- Level of inventory
- Value of the order
- Volume of the order
- Value of forward orders
- Volume of forward orders
- Customer relationship management
- Supplier relationship management
- Desired profit
- Brand attributes

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?

In my view, the investigation is not only justified but essential, as the impact of low-priced, fully fabricated imports—particularly from China—has already reshaped the Australian market in ways that are materially harming local manufacturers.

The injury we are experiencing is consistent with the applicant's claims: persistent margin suppression, the loss of long-standing market segments, the rise of import-only suppliers, and the growing pressure on established fabricators to consider offshore production simply to remain viable. I believe the above case studies point out the lived reality of this unfair competitive dynamic.

A further concern I want to emphasise is the real risk of circumvention on this case once duties are imposed. In Western Australia we are already seeing buildings redesigned so that imported curtain wall modules can be used in places where Australian manufacturers would traditionally supply window wall, and this is often achieved by installing sub-sills or subframes to make curtain wall behave like window wall.

This practice allows imported product to enter the country classified as curtain wall—which is excluded from the definition—even though it effectively performs the function of window wall. If anti-dumping duties are introduced but this loophole remains unaddressed, there is a strong likelihood that duties will be undermined, and the intent of the measures defeated.

For these reasons, I believe the Commission must consider not only the pricing behaviour of imports but also how classification practices can be manipulated in the façade sector to avoid the clearly necessary duties. Ensuring clarity and preventing misuse of curtain wall classifications will be critical if duties are to restore fair competition and protect Australia's remaining fabrication capability.

I would welcome the opportunity to discuss this issue, my concerns and any elements of the submission with the commission.

E Certification

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

Date: 21/1/2026