

ANTI DUMPING COMMISSION

Investigation No 691

Aluminium windows and doors exported from the People's Republic of China

Submission concerning Ventora and AGWA window testing claims

Testing evidence product quality and fair comparison

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Central position

The reported failure of seven selected windows is serious evidence about those specimens in the condition in which they were tested. It is not evidence that all Chinese windows are defective, and it does not establish dumping, subsidy, material injury or causation in Investigation 691.

Eight unidentified specimens from two house lots cannot be used to paint every Chinese manufacturer, window system and product with the same brush.

If Ventora and AGWA want the Commission or the public to draw broader conclusions, they must publish the complete technical record, preserve the physical evidence and allow the affected suppliers to inspect and independently retest it.

WHY ECOECO IS MAKING THIS SUBMISSION

This submission arises because a very limited testing exercise has been used to support a much broader public narrative about Chinese-manufactured windows.

The underlying testing concerned eight window specimens taken from two residential house lots. Seven reportedly failed aspects of the required performance testing.

Those results did not remain a narrow technical finding about eight particular specimens.

They were carried into public communications under headlines and descriptions concerning “cheap Chinese windows”, imported Chinese window systems, compliance failures and potential safety risks.

AGWA published material headed “Serious flaws found in cheap window frames imported from China”. Capral subsequently published “Recent Testing Raises Questions Around Imported Chinese Window Systems and Australian Compliance”, linking the Ventora testing to the wider issue of imported Chinese window systems, compliance and local manufacturing capability.

The scale of the public framing is substantial. In material announcing its anti-dumping action, AGWA stated that Australia’s aluminium window manufacturing sector directly generates \$2.72 billion in revenue and employs over 9,000 Australians, while the broader supply chain—including glass processing, extrusion, glazing, installation and hardware—creates an \$8.85 billion ecosystem supporting more than 26,000 jobs across metropolitan and regional communities.

That industry-wide framing then appeared in mainstream publicity. In April 2026, News Corp reported the issue under the headline “Cheap Chinese window imports threaten 26,000 Australian manufacturing jobs”. The significance is the scale of the proposition being put publicly: Chinese window imports are presented as a threat extending across a substantial part of the Australian window-and-door supply chain. If injury on that scale is relied upon publicly, it should be capable of reconciliation with verified evidence showing which producers suffered injury, what proportion of Australian production they represent, where the lost business went and what part of any loss was actually caused by dumped imports.

The effect of that messaging is to invite the public to associate the words cheap, Chinese and unsafe with an entire class of products, even though the disclosed testing evidence concerns only eight selected and unidentified specimens from two house lots.

That matters in the context of Investigation 691. Public concern about product safety and compliance can readily become public resentment toward “cheap Chinese” products generally, while any reduction in lawful competition and any resulting increase in window prices would ultimately be borne by Australian builders, homeowners and other purchasers.

EcoEco does not object to failed products being identified, investigated or criticised.

If a window fails an applicable Australian requirement, that failure should be dealt with.

The issue is something quite different.

What do eight specimens from two house lots actually prove?

Do they establish deficiencies in those particular windows?

Or can they legitimately be used to characterise Chinese-manufactured windows generally — across numerous manufacturers, systems, designs, specifications, customers and projects?

That distinction matters because the public message moved well beyond the tested specimens.

A test result is evidence.

A generalisation is a conclusion.

And public messaging does not become evidence merely because it is repeated.

The strength of the conclusion cannot exceed the strength, identity and representativeness of the evidence supporting it.

Consumers should not be asked to pay more because a limited sample has been allowed to create an impression about an entire country's products that the evidence itself cannot sustain.

This submission therefore examines the testing on that basis: what was tested, what failed, what remains undisclosed, what can properly be concluded from the results, and what cannot.

Relevance to Investigation 691

The Ventora testing campaign does not prove any of the statutory matters the Commission must decide. Product failure and dumping are different questions. A non compliant window is not necessarily dumped. A compliant window may still be dumped. Testing eight specimens does not establish normal value, export price, subsidy, material injury or causation.

The Commission should therefore prevent the testing publicity from doing work that the technical evidence and statutory analysis cannot do. The testing material should be given no weight beyond the individual specimens unless the applicants provide a complete and verifiable record supporting any broader inference.

A true Australian industry example

Some years ago, a major project builder discovered that windows supplied for completed Australian houses were leaking. The supplier responded as a responsible manufacturer should: it arranged for the exact house lot of windows to be tested. **Every window tested leaked — 20 out of 20, 100%.**

Those were Australian-manufactured windows installed in Australia.

I will not identify the manufacturer. The identity is unnecessary because the point is not to discredit that company or Australian manufacture. The point is that test failure can occur in any country and under any recognised system. A responsible manufacturer does not run away and lick its wounds. It investigates the failure, identifies the cause, corrects the product, retests it and ensures that the corrected configuration is reproduced.

The incident also demonstrates the limits of labels and certificates. ISO certification, system certification and Australian manufacture do not guarantee that every production window will be perfect. Equally, Chinese manufacture does not establish that a product is defective. Long distance transport creates handling risks that must be controlled, but transport history, installation, preparation and mounting must be examined rather than assumed.

Treatment requested

EcoEco asks the Commission to:

1. Treat the reported results as evidence concerning the eight selected specimens only, unless a broader inference is supported by the complete technical record.
2. Require the complete reports, photographs, footage, selection records, specimen histories, chain of custody, preparation and mounting records, identified causes, modifications and retest results before relying on the testing.
3. Establish whether the manufacturers, exporters, importers and suppliers were notified and given access to the reports and specimens.
4. Require the eight specimens to be preserved in their post-test condition under a documented chain of custody, place their location and present condition on the public record, and make them available for inspection and independent examination.
5. Reject any inference that country of manufacture establishes product quality or that these tests establish dumping, subsidy, material injury or causation.
6. Apply the same evidentiary standard to imported and Australian products by comparing first test with first test or final developed configuration with final developed configuration.

Detailed submission

The following article was originally published by EcoEco on LinkedIn. It is reproduced below together with additional material developed for this submission.

SEVEN OUT OF EIGHT CHINESE WINDOWS REPORTEDLY FAILED—BUT THE PUBLIC HAS SEEN ONLY PART OF THE EVIDENCE

In May 2026, The Daily Telegraph reported on testing commissioned by Ventora Group of eight aluminium and glass windows imported from China.

The Australian Glass and Window Association subsequently republished the claims and released further material about the testing.

AGWA reported that the eight samples came from two residential house lots and that seven failed the basic N2 performance requirements applicable to the projects.

The reported failures were serious.

Footage showed substantial water penetration through window frames during simulated wind and rain. Some specimens reportedly failed structural-strength testing, and one window panel became dislodged from its frame.

Ventora CEO Scott Kelly described the results as “frightening”. AGWA CEO Clinton Skeoch described the footage as “confronting” and said the failures should concern governments and homeowners.

Product compliance matters. A window supplied for an Australian home should perform to the requirements applicable to its intended use.

If particular windows failed valid testing, those failures should be investigated and corrected.

But the public has been given the headline, the footage and the initial failure count—not the complete technical record needed to understand what happened.

The manufacturers have not been identified.

The suppliers have not been identified.

The products and window systems have not been identified.

The complete reports have not been published.

We do not know what caused each failure, whether the suppliers examined the products, whether minor corrections were made or whether the affected tests were repeated.

Without that information, “seven out of eight failed” is not a complete technical account.

FIRST, DISTINGUISH TWO DIFFERENT KINDS OF TESTING

If Ventora’s purpose was market-surveillance testing—to determine whether the windows performed exactly as supplied—an initial failure is relevant evidence about that particular specimen in the condition in which it was tested.

The supplier does not get to erase that result merely by correcting the product later.

But an initial failure does not, by itself, prove that the underlying window system is incapable of compliance.

It is also different from system-development testing, where the manufacturer observes the testing, diagnoses weaknesses, makes recorded changes and retests the product until a compliant configuration is established.

That distinction is decisive.

An initial as-supplied failure may establish that an individual specimen failed.

Without diagnosis, supplier inspection and retesting, it does not establish why the specimen failed, whether the problem was minor and correctable, whether it accurately represented the underlying system or whether every product manufactured under that system would fail.

It certainly does not establish that Chinese-manufactured windows generally are defective.

INITIAL FAILURES ARE NORMAL IN SYSTEM TESTING

After 30 years in the window industry, I know that a window does not necessarily arrive at a laboratory and pass every test on its first attempt.

It is not unusual for a supposedly compliant Australian-made window to fail a test until a minor issue is identified and corrected.

A seal may need repositioning. Drainage may require a minor alteration. Hardware may need adjustment. A glazing or fabrication detail may need correction.

The affected test is then repeated, often during the same testing session.

Every change is recorded. If the corrected specimen passes, the final recorded configuration becomes the configuration that must be reproduced in future manufacture.

This is not evading the test. It is part of the purpose of system testing:

1. Expose a weakness.
2. Identify its cause.
3. Correct it.
4. Verify the correction.
5. Incorporate the recorded correction into future production.

Recording a change does not itself make the window pass. The corrected specimen must still satisfy the applicable test.

The proper technical record should show the original configuration, the failure, its cause, every modification, every retest and the final configuration that passed.

A bare statement that a specimen “failed” reveals only the beginning of that history.

AUSTRALIAN SYSTEMS AND IMPORTED SPECIMENS MUST BE COMPARED FAIRLY

Australian window systems are promoted on the basis of their final tested and certified configurations after development, adjustment and retesting.

Ventora’s imported specimens have been publicly presented through their first reported failures.

That is not necessarily an equal comparison.

The relevant comparison is:

FIRST TEST AGAINST FIRST TEST, OR FINAL DEVELOPED CONFIGURATION AGAINST FINAL DEVELOPED CONFIGURATION.

If Australian systems benefit from diagnosis, modification and retesting, the public should at least be told whether the imported specimens were examined through the same process and what happened when any correctable problem was addressed.

Otherwise, the comparison places the first disclosed failure of one product against the final refined certificate of another.

THE SUPPLIER'S INVOLVEMENT MATTERS

The manufacturer or supplier knows the product's profiles, glazing, seals, drainage, hardware, fabrication and intended performance classification.

That makes the supplier best placed to determine whether a failure resulted from an inherent system problem or from fabrication, adjustment, glazing, installation, handling, transportation or test preparation.

The same principle operates during the warranty period.

When a minor problem emerges, the supplier is ordinarily given an opportunity to inspect it, diagnose its cause and repair, adjust or replace the affected component.

A warranty does not excuse non-compliance, erase an original failure or make a serious safety defect acceptable. It recognises that an individual fault may be rectifiable and does not automatically establish that the entire underlying system is defective.

The published material does not disclose whether the suppliers of these windows were contacted, whether the products remained under warranty or whether the suppliers were given an opportunity to inspect and rectify them.

Nor does it disclose whether the manufacturers attended the testing, examined the failures, made recorded corrections or witnessed any retesting.

Those omissions matter when the initial results are used to make claims about complete window systems rather than merely the individual specimens.

WHAT HAPPENED BEFORE THE WINDOWS REACHED THE LABORATORY?

The testing was reportedly conducted through an accredited independent laboratory.

That may establish the laboratory's competence to perform the nominated tests within its accredited scope.

It does not establish what happened before the windows reached the laboratory.

The published accounts do not identify:

- who selected the eight specimens;
- why those particular windows were selected;
- whether they were chosen randomly or because problems were already suspected;
- who removed them from the houses;
- their condition before and after removal;
- whether they were damaged or distorted;
- how they were packaged, supported and transported;
- who maintained custody of them;
- whether they were altered, repaired or adjusted;
- who prepared and mounted them; or
- whether the manufacturers' instructions were followed.

NATA's guidance on building-product testing says that sample integrity can be compromised by poor selection, preparation, storage, transportation or identification.

It also explains that a test result ordinarily applies to the particular item tested.

The laboratory may have performed its work perfectly.

That does not retrospectively establish that each specimen was properly selected, removed, transported, preserved, prepared and mounted.

Laboratory competence and specimen integrity are separate questions.

WAS THE PROCESS WITNESSED?

Witness testing is normal in many industries where results may have serious commercial, regulatory or safety consequences.

A supplier representative or independent witness can observe:

- the specimen's identity and initial condition;
- how it was selected and handled;
- how it was prepared and mounted;
- the test conditions applied;
- the nature and location of each failure;
- every correction made; and
- the result of every retest.

NATA's guidance confirms that a laboratory customer may arrange to witness testing, although witnessing does not permit interference with the test or its outcome.

The published accounts do not disclose whether anyone independent of the commissioning party witnessed the selection, removal, transportation or preparation of the specimens.

They do not disclose whether representatives of the affected suppliers witnessed the testing.

If the suppliers were not represented, they should now receive the complete reports, photographs and footage and be given access to the specimens.

A supplier cannot meaningfully answer an allegation about an unidentified product supported by an undisclosed report.

WHERE ARE THE EIGHT WINDOWS NOW?

The physical specimens are the primary evidence.

Where are they now?

Have they been retained by the laboratory or Ventora?

Were they returned to the builders, owners, importers or suppliers?

Have they been repaired, altered, dismantled, discarded or destroyed?

If they still exist, have they been preserved in their post-test condition?

Are they available for inspection by the manufacturers, exporters, importers and suppliers whose products were tested?

Even where a structural test has damaged a specimen and made further performance testing impractical, the product may still be examined to determine:

- its manufacturer and system;
- its condition and configuration;
- whether components were missing or incorrectly installed;
- its glazing, seals, hardware and drainage arrangements;
- how it was mounted in the test apparatus;
- where the failure occurred; and
- whether the failure resulted from the product, its installation, transportation, preparation or mounting.

If the specimens no longer exist, the public should be told when they were disposed of, by whom, for what reason and whether the affected suppliers were first offered an opportunity to inspect them.

Serious public allegations have been made using these eight windows as evidence.

The affected parties should be allowed to examine that evidence while it still exists.

PRESERVATION OF THE PHYSICAL EVIDENCE

If Ventora and AGWA rely upon these tests as evidence in Investigation 691, the evidence cannot consist merely of selected footage, reported conclusions and an unsupported failure count. The eight tested specimens are the primary physical evidence underlying those claims.

Each specimen must be preserved, individually identified and protected against alteration under a documented chain of custody until Investigation 691 and any review proceedings have concluded. The location, present condition, custody and availability of each specimen for inspection and independent examination must be placed on the public record, subject only to properly justified confidentiality.

If any specimen has been repaired, altered, dismantled, returned, discarded or destroyed, the applicants must disclose when this occurred, who authorised it, why it occurred and whether the affected manufacturer, exporter, importer or supplier was first offered an opportunity to inspect it.

A party cannot rely upon a physical specimen as evidence while denying affected parties access to it or allowing the evidence itself to disappear. If the specimens have not been preserved and made available for examination, the Commission should give the testing claims no weight beyond what the disclosed reports can independently and verifiably establish.

REVERSE THE METHODOLOGY

The fairness of the methodology can be tested by reversing it. If eight Ventora windows were selected from two completed Australian house lots, removed and transported, privately tested without Ventora's technical representatives present, and their initial failures publicised before Ventora could inspect, explain or retest them, those failures would not establish that Ventora's systems generally were defective or that Australian-made windows generally were unsafe. The same evidentiary standard must apply to Chinese-manufactured products.

SEVEN OUT OF EIGHT—BUT EIGHT OUT OF HOW MANY?

AGWA reported that the eight specimens came from two residential house lots.

It did not disclose how many windows were contained in those house lots or how the eight were selected.

Were eight selected from eight?

Eight from twenty?

Eight from forty?

If the two house lots contained 40 windows, for example, the disclosed result would be:

- seven tested windows failed;
- one tested window passed; and
- 32 windows were not tested.

It would not establish that seven out of 40 failed.

It would equally not establish that 35 out of 40 would have failed.

The only measured result would remain that seven of the eight selected specimens reportedly failed.

AGWA's descriptions also differ.

One article refers to "eight aluminium and glass windows".

Another refers to "8 window samples from two residential house lots".

A later article describes "eight tested window systems".

Those descriptions are not equivalent.

A physical window is a specimen.

A window system is a design incorporating specified profiles, components, glazing, hardware, seals, drainage and fabrication requirements.

The published material does not establish whether the eight specimens represented one system, several systems or eight separate systems.

Even if they accurately represented the two house lots, they could not represent every Chinese manufacturer, supplier, system and product entering Australia.

EIGHT WINDOWS CANNOT PAINT AN ENTIRE COUNTRY WITH ONE BRUSH

The public presentation encourages a country-wide conclusion from a tiny, selected and unidentified sample. That is the evidentiary equivalent of painting every Chinese manufacturer, system and product with the same brush.

China is not a manufacturer, a window system, a production line or a single quality-control process. It is a country containing many independent manufacturers producing different designs, materials, components and performance classes under different quality systems. Product performance must be established product by product and supplier by supplier.

The eight specimens have not been publicly connected to EcoEco, Hennissey or the overwhelming majority of Chinese exporters, Australian importers and window systems affected by Investigation 691. Nevertheless, the footage and the phrase "seven out of eight failed" are capable of being used as a visual shortcut for a conclusion about all Chinese goods covered by the investigation.

That shortcut must be rejected. A defect in one unidentified specimen is not a national characteristic. Seven reported failures cannot establish a country-wide failure rate unless the applicants first establish a representative sampling frame, random or otherwise defensible selection, traceable product identities and statistically supportable grounds for extrapolation. None of that has been disclosed.

The Commission should not permit images of selected failures to substitute for evidence about untested manufacturers, exporters, systems or products. The statutory questions of dumping, material injury and causation must be decided from verified evidence, not from a country-of-origin generalisation.

This is product profiling by country of origin. EcoEco's windows have not been tested, have not been identified among the failed specimens and have not been shown to share their manufacturer, system, design or defects. Yet the public description of "Chinese windows" necessarily sweeps EcoEco's products into the same adverse category. Country of manufacture must not become a substitute for evidence. EcoEco should not carry an evidentiary burden created by the failure of unidentified products made by unrelated manufacturers simply because both originated in China.

SERIOUS SAFETY ACCUSATIONS STILL REQUIRE EVIDENCE

The seriousness of a safety accusation does not remove the need for evidence.

An unsafe specimen establishes an issue concerning that specimen. It does not establish that every Chinese-manufactured window, system or product is unsafe.

Country of manufacture is not a safety classification. Safety must be established by evidence concerning the product actually in issue.

The seriousness of an accusation cannot compensate for weakness in the evidence supporting it. A serious allegation does not expand the evidentiary reach of eight selected and unidentified specimens.

PUBLISH THE COMPLETE RECORD

Before the failure of individual specimens is used to condemn broader window systems or a national industry, the following should be disclosed:

1. The complete test reports, photographs, footage and supporting records.
2. The present location and condition of the eight specimens.

3. The identity and warranty status of each specimen.
4. The manufacturers, exporters, importers and suppliers involved.
5. The number of windows contained in the two house lots.
6. The method used to select the eight specimens.
7. Their condition before removal and upon arrival at the laboratory.
8. Their removal, packaging, transportation and chain of custody.
9. Who prepared and mounted them.
10. Whether independent witnesses or supplier representatives attended.
11. The classifications, pressures and acceptance criteria applied.
12. The precise cause assigned to each failure.
13. Every adjustment, repair and modification.
14. Every retest and its result.
15. Whether the specimens remain available for inspection and independent retesting.

CONCLUSION

If seven windows failed valid testing against the requirements applicable to them, those failures should be taken seriously.

But the result must be described accurately.

An initial failure may establish that a particular specimen failed in the condition in which it was tested.

It does not, without further evidence, establish the cause of the failure, that the underlying system was incapable of compliance or that every product manufactured in the same country would fail.

The public has not been shown the complete reports, the specimen histories, the causes of failure, the suppliers' responses or the retesting records.

It has not even been told where the eight windows are now or whether the parties whose products were tested can inspect them.

Until those matters are disclosed, "seven out of eight failed" remains an incomplete account of eight selected specimens—not a verdict on Chinese window systems generally.

If the eight specimens are to be relied upon in Investigation 691, they must be preserved and made available for inspection. Their identity, present location, condition and complete chain of custody must be disclosed. Evidence cannot be invoked against an entire class of goods and then withheld, altered or allowed to disappear.

BEFORE THE FAILURE OF AN INDIVIDUAL SPECIMEN IS USED TO CONDEMN A WINDOW SYSTEM OR A NATIONAL INDUSTRY, DISCLOSE THE COMPLETE RECORD, PRESERVE THE PHYSICAL EVIDENCE AND ALLOW THE AFFECTED SUPPLIER TO INSPECT, EXPLAIN AND INDEPENDENTLY RETEST IT.



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