

28/9/2026

The Director – Investigations
Anti-Dumping Commission
GPO Box 2013
Canberra ACT 2601

Investigation 691 – Aluminium windows and doors exported from China
Submission by BROAD WINDOWS PTY LTD

BROAD WINDOWS PTY LTD is a contractor that buys aluminium windows and doors for its projects, including from Broad Windows and Doors and Curtain Wall System Co., Ltd. We have a direct interest in the outcome of this investigation, and we make this submission ahead of the Statement of Essential Facts (SEF), due on or before 14 October 2026.

Our concern is with how the Australian industry has been identified. Almost everything in this investigation depends on it: whether the application has enough support, and whose performance is used to measure injury. On the public record, we do not think that work has been done yet.

What the Commission did at initiation

The Consideration Report records that "Ventora cannot satisfy standing individually and has provided supporting statements of other Australian manufacturers/producers that it considered could manufacture like goods and their production volumes, which is contained in confidential attachments", and that "the commission has reviewed the information provided" (Consideration Report No. 691). Put simply, the applicant chose which local businesses to put forward, and the Commission reviewed what it was given. Nothing in the report shows the Commission contacting any other Australian producer.

Questions we ask the Commission to answer before the SEF

1. Who is the Australian industry? The Commission's file note lists 21 supporting businesses (EPR 450). It does not say which of them actually make windows and doors in Australia, or what each makes.
2. Were producers asked? The Australian Glass and Window Association, a co-applicant, has many window and door businesses among its members. It is not clear whether they were told about the application or asked for their view. A producer that was never asked cannot be counted as supporting or opposing, but its production still belongs in the total.
3. What is the 55% measured against? The file note says the supporters and Ventora represent "55% of the total estimated production volume of like goods". It does not say how that total was estimated, or whether it was tested. The Consideration Report describes a market size estimate that included "estimated sales volumes of the remaining industry members not commenting on the application".
4. Is anything counted twice? The goods include windows and doors "whether fully or partially assembled, including their frames, panels, and sashes" (ADN 2025/115). If one business makes frames and another assembles them into finished windows, both outputs could end up in the total.

5. Does each business carry out a substantial process in Australia? Under s 269T(3) of the Customs Act 1901, goods are partly made in Australia only if "at least one substantial process in the manufacture of the goods was carried out in Australia". The Consideration Report makes that finding about Ventora. We have not seen it made for any of the supporters.

Why the numbers matter

The 55% figure depends entirely on the estimate behind it. If the estimate captured 80% of real Australian production, the supporters' share falls to 44%. If it captured about two thirds, the share falls to about 36%. If it captured a little under half, the share falls to 25%, the minimum the Act requires. We do not say any of these is the right figure. We say none of them can be ruled out on the present record.

What we ask

When it started the investigation, the Commission said it "will verify the manufacturing process of the like goods during the investigation" and "will reassess the market size during the course of the investigation based on verified data obtained from interested parties". We ask that both steps be completed before the SEF, and that the Commission invite all Australian producers of like goods to identify themselves and state their production.

Yours sincerely,



Daniel Afonso
Director
BROAD WINDOWS Pty Ltd