**ODS Windows**
**22 Mills RD Braeside Vic 3195**

**27th October 2026**

Australian Trade Remedies Commission
Investigations 1
GPO Box 1632
Melbourne VIC 3001

**Re: Investigation No. 691 – Aluminium Windows and Doors from China**
Dear Commissioner,

I am writing on behalf of ODS Windows Pty Ltd in response to the Statement of Essential Facts for Investigation 691 concerning fully and partially fabricated aluminium windows and doors from China.

ODS Windows is a Victorian-owned aluminium window and door manufacturer based in Braeside. We have operated in Victoria since 2007 and manufacture our windows and doors locally for projects ranging from luxury architectural homes through to commercial projects and multi-level residential developments. We have built our business working closely with many of Melbourne's architects and builders, delivering highly customised window and door solutions and supporting local suppliers wherever possible.

ODS has participated directly in this investigation and previously provided detailed information to the Commission about our business and our experience in the Australian market. I appreciate the work that has gone into the investigation and, having reviewed the Statement of Essential Facts, support the Commission's preliminary finding that dumped and subsidised aluminium windows and doors from China have caused material injury to the Australian industry.

For us, this is not an abstract argument about trade. We manufacture windows and doors in Melbourne. That means employing people here, operating a factory here, purchasing materials, maintaining skills and manufacturing capability, and taking responsibility for the products and projects we deliver. We understand and accept that imports are part of the Australian market and that Australian businesses need to compete. Competition itself is not the problem. The issue is whether Australian manufacturers are being given the opportunity to compete on fair commercial terms.

ODS has built its reputation by working closely with architects, builders and clients to deliver products specifically suited to individual projects. Our ability to provide customised and technically appropriate solutions, manufacture locally and remain involved through supply and installation is an important part of what we offer the market.

Like any manufacturer, however, our ability to maintain and invest in that capability ultimately depends upon there being a sustainable market for Australian-made products. Where completed imported windows and doors enter Australia at dumped prices, the impact goes beyond an individual tender. Over time, it affects the confidence of Australian businesses to invest in factories, equipment, people and skills.

Our experience is also relevant to the discussion about the Australian industry's capability to service commercial, multi-residential and other Class 2 to 9 buildings. ODS has extensive experience across residential and commercial construction, including multi-level residential projects, and manufactures its aluminium windows and doors at our Braeside facility.

Where those projects have incorporated products that, when installed as part of the façade, form window wall as defined by AS 2047, they provide practical examples of Australian manufacturing capability in the segment considered by the Commission.

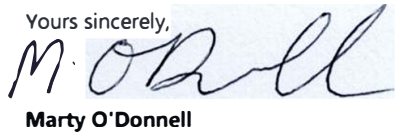
ODS Windows has spent nearly two decades developing its manufacturing capability, relationships and reputation in Victoria. We want to continue manufacturing here, investing in our people and capability, and working with Australian architects, builders and suppliers.

We are not asking to be protected from normal competition. Australian manufacturers should continually have to compete on price, quality, service, innovation and capability. What we are asking for is the opportunity to compete on a fair commercial basis.

The findings in the Statement of Essential Facts recognise the injury being experienced by Australian manufacturers and provide an opportunity to restore a fairer competitive environment. The Commission has preliminarily found that dumped and subsidised imports from China caused material injury to the Australian industry.

For those reasons, ODS Windows supports the direction of the findings in the Statement of Essential Facts and the implementation of effective measures arising from Investigation 691.

Yours sincerely,



**Marty O'Donnell**
Managing Director
ODS Windows Pty Ltd