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**From:**  
**Sent:** Wednesday, 29 January 2014 2:00 PM  
**To:** 'JONES Rod'; 'BRACIC John'  
**Cc:** 'COLE Cathy'; Operations1@adcommission.gov.au  
**Subject:** ADC221: Wind Towers

Dear John & Rod,

GWA values the contribution of local suppliers to our wind farm projects and has achieved substantial local content for the Mortons Lane and Gullen Range Wind Farms. This includes 30 wind towers that have been supplied by the Australian Industry. The Australian Industry has also won substantial additional works as a result of this local supply preference and relationship established through these tower contracts.

GWA would like to address the following aspects of the PAD.

- The outcome of a competitive tender process run in Australia by GWA was used to select the suppliers of wind towers to our projects. GWA submits that any subsequent procurement negotiations with selected international suppliers had no detrimental impact on the Australian Industry and did not cause any injury.
- The PAD refers to the findings of an investigation into steel plate. GWA submits that there are WTO precedents that require that any adjustment to normal values arising from these findings needs to be justified with corresponding analysis in relation to the market for wind towers.
- GWA notes that steel tower flanges follow a different manufacturing process to rolled steel plate and are supplied through a different supply chain, they should therefore not be treated in the same manner as steel plate when constructing a normal value.
- GWA notes in relation to the Application that;
  - it is evident that there are some incorrect facts stated in the application. It is important that ADC should verify any information that is relied upon in order to avoid errors.
  - Many details remain confidential and we have been unable to comment on these.

GWA apologises for the lateness of this submission, however as you are aware we have been waiting for the release of Verification Visit reports from the exporters, one of which is still not released on the public record.

Kind Regards

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Goldwind Australia Pty Ltd

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