



18 June 2014

NON-CONFIDENTIAL

Ms Candy Caballero  
Director Operations  
Australian Anti-Dumping Commission  
Customs House  
1010 La Trobe St  
Docklands Vic 3008

Dear Ms Caballero,

**PV MODULES OR PANELS FROM CHINA**

This submission, made on behalf of Changzhou Trina Solar Energy Co Ltd (“Trina Solar”), requests immediate redefinition of the goods under consideration (“GUC”) in the captioned investigation to exclude the following PV modules and panels.

- PV modules and panels having a power output of 300 watts or greater; and
- PV modules and panels for ground mounted systems.

The Australian industry producing PV modules or panels, ie Tindo Manufacturing Pty Ltd (“Tindo”), does not produce like products to the abovementioned modules and panels as it is not certified to produce and/or sell them into the Australian market. In its application Tindo refers to the said modules and panels which it is not certified to produce and/or sell as those falling within the “commercial-scale systems” segment of the commercial/industrial market sector.

The submission to the Commission by Infigen Energy posted on the Commission’s electronic public record (“EPR”) on 12 June 2014 (copy attached) makes clear the fact that Tindo does not produce like products to the abovementioned modules or panels. This Infigen Energy submission provides compelling evidence that Tindo does not produce PV modules and panels with characteristics which closely resemble those in respect of which we hereby request exclusion of from the GUC. It demonstrates that they have different physical and commercial characteristics and are not interchangeable. It is paramount that Tindo is not certified to produce and/or sell the modules and panels in respect of which exclusion is sought.

There should be immediate exclusion of the said modules and panels from the GUC as it is unreasonable to require selected exporters to include these products as GUC in their questionnaire responses.

We await your prompt response.

Yours sincerely,

Roger Simpson