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30 June 2014

The Director
Operations 3
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Anti-Dumping Commission.
5 Constitution Ave.
Canberra City.ACT. 2601.
Email: operations3@adcommission.gov.au

PUBLIC RECORD

ANTI-DUMPING NOTICE NO. 2014/38

Dear Sir/Madam,

We refer to the Anti-dumping notice, ADC 239 brought to you by Tindo Solar. In response to Tindo Solar's claim, CSR Bradford on behalf of CSR Limited, would like lodge the following submission for the Public Record.

Whilst empathetic to the plight of Australian manufacturers, particularly as CSR is a significant manufacturer in Australia, CSR has not seen any substantial evidence of price dumping in the market place to intentionally impair local assembly or manufacturing.

What we have seen is some volatility in demand, due a combination of many factors such as;

- the timing of changes in various Federal or State government solar / renewable energy incentive schemes;
- economic and consumer confidence;
- the costs of alternative power supply v's solar PV;
- consumer awareness or acceptance of solar panel systems as viable and affordable alternatives;
- technological advances in panels, inverters and associated equipment; and
- the availability of skilled, capable and credible tradespeople to complete the installation component of the demand.

We believe that competitive sourcing and pricing of Solar PV panels is good for the Australian consumer and broader solar market. As this technology becomes more efficient, and as competition grows, the more price competitive offers will become, and a greater benefit will be generated for both the environment and consumers. To selectively impose duties or tariffs on importers is not an efficient manner to stimulate Australian manufacturing capability in this industry.

Responder's Company Information:

CSR Bradford, a division of CSR Limited, has been a procurer, installer and reseller of Solar Photovoltaic modules since 2011, across both commercial and residential uses.

The Applicant:

CSR Bradford has NO commercial dealings with the Applicant "Tindo Solar", nor has it directly competed with Tindo on any materially significant projects.

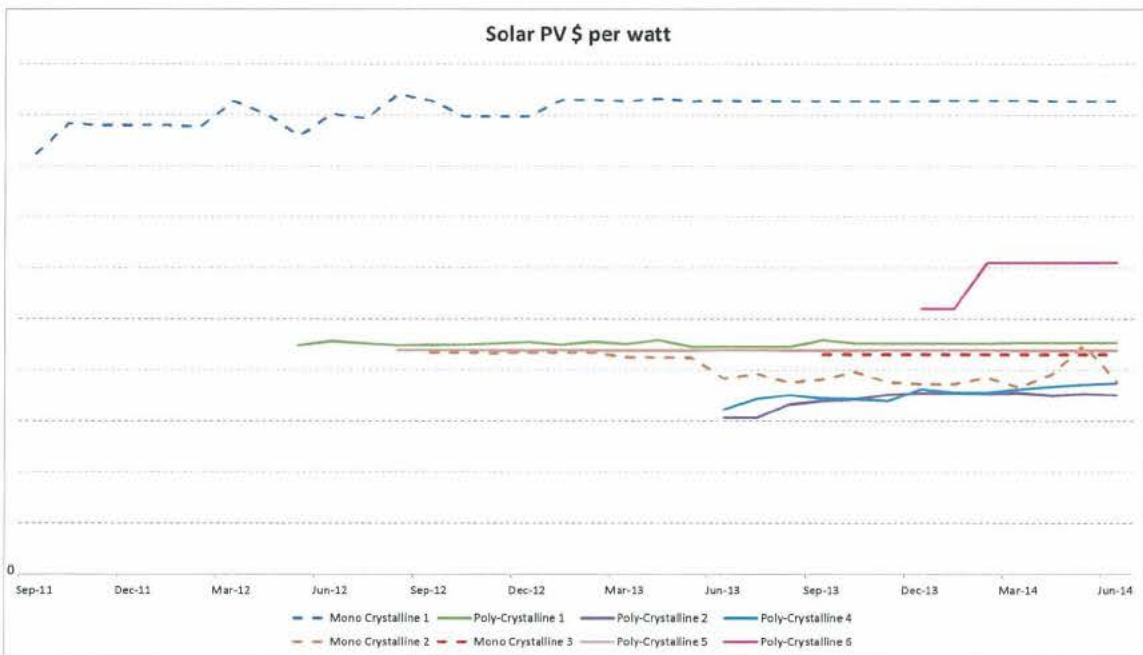
The Applicant's claims:

The applicant, "Tindo Solar", is an assembler of imported Solar PV components, established around July 2012. As set out in the ADC consideration report, the applicant assembles and sells only 2 models of Solar Photovoltaic panels, the Karra 240 and Karra 250.

The Solar PV market is well-established, has been supported by Federal and State government incentives since 2008, and estimated to be \$670M - \$770M. In that environment it is difficult to conclude that the applicant, Tindo Solar, only in operation since 2012, can claim to be representative of the Australian solar manufacturing market.

The importation of Solar PV panels is nothing new to this industry.

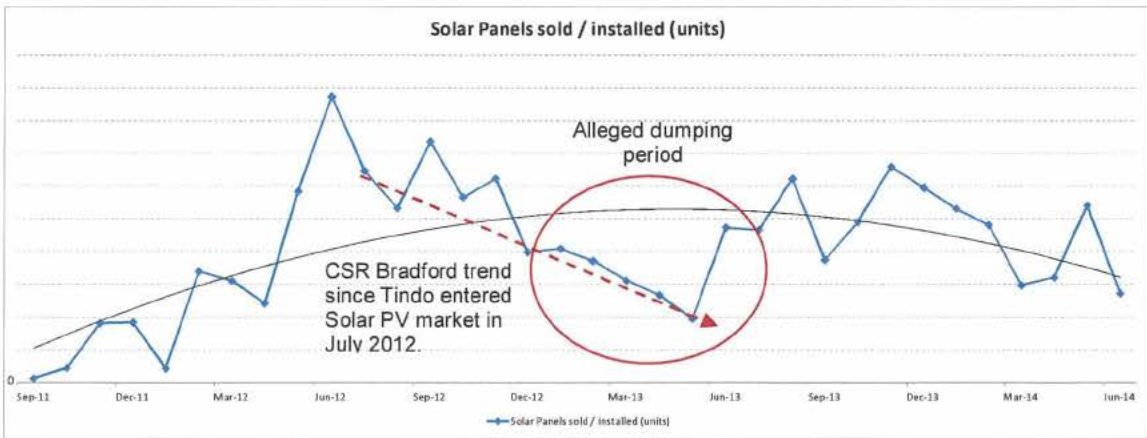
CSR Bradford has been a procurer, assembler, installer and seller of imported Solar PV panels prior to the establishment of Tindo Solar's manufacturing operations. During such time we have not experienced significant variations in the per-unit or per-watt cost of goods, as displayed in the trend chart below. The chart below represents different wattage systems across mono-crystalline and poly-crystalline panels (for use in both commercial and residential applications) from multiple vendors, and not just panels sourced from Chinese manufacturers.



In addition to the panel costs represented in the chart above, CSR Bradford adds its own costs of freight, installation labour and materials, sales and marketing expenses to arrive at a price to the consumer that is competitive with other offers in the market place.

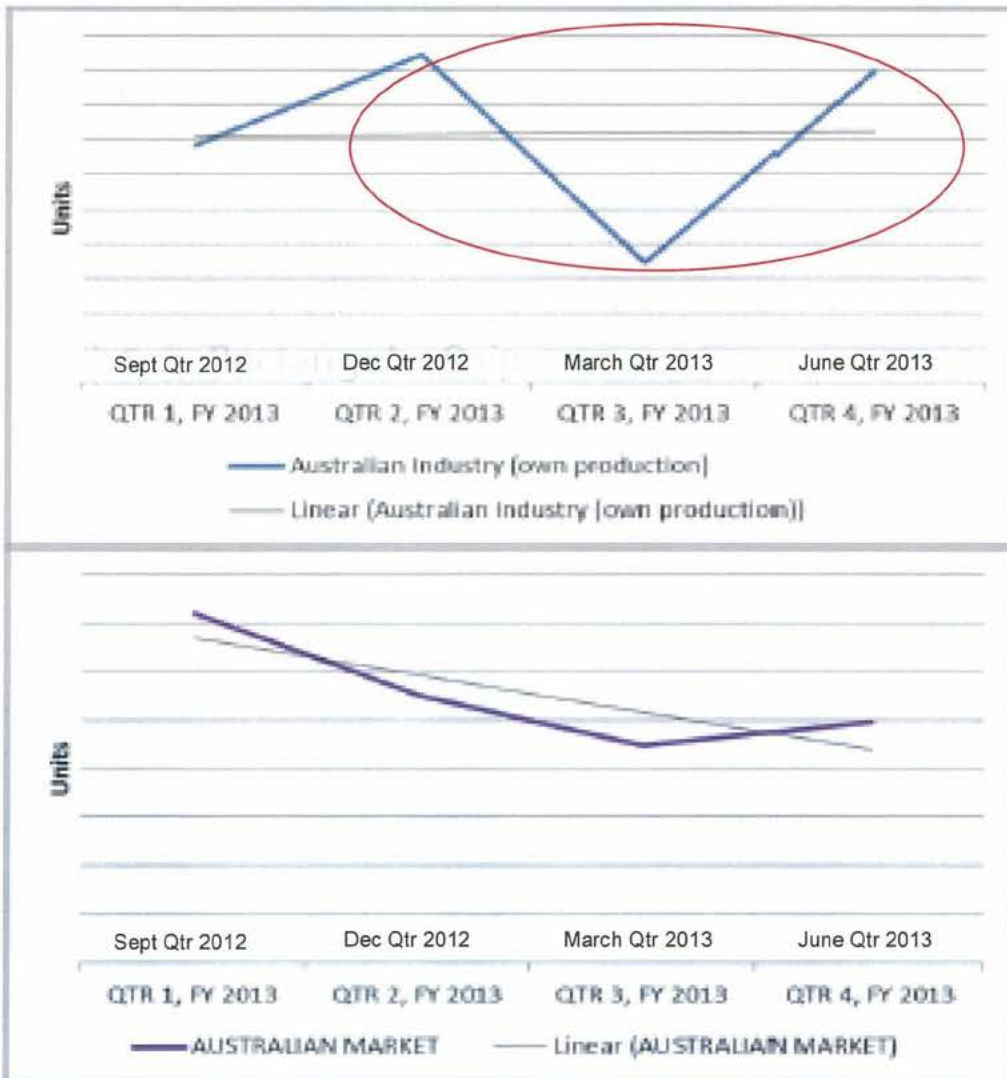
The CSR Bradford volume of units sold trend is consistent with those suggested by Tindo, as representative of its own sales volumes and those of the Australian market. This is captured in the chart below.

CSR Bradford Volume Trend (Units)



Tindo Anti Dumping information presented in Form B108, page 37.

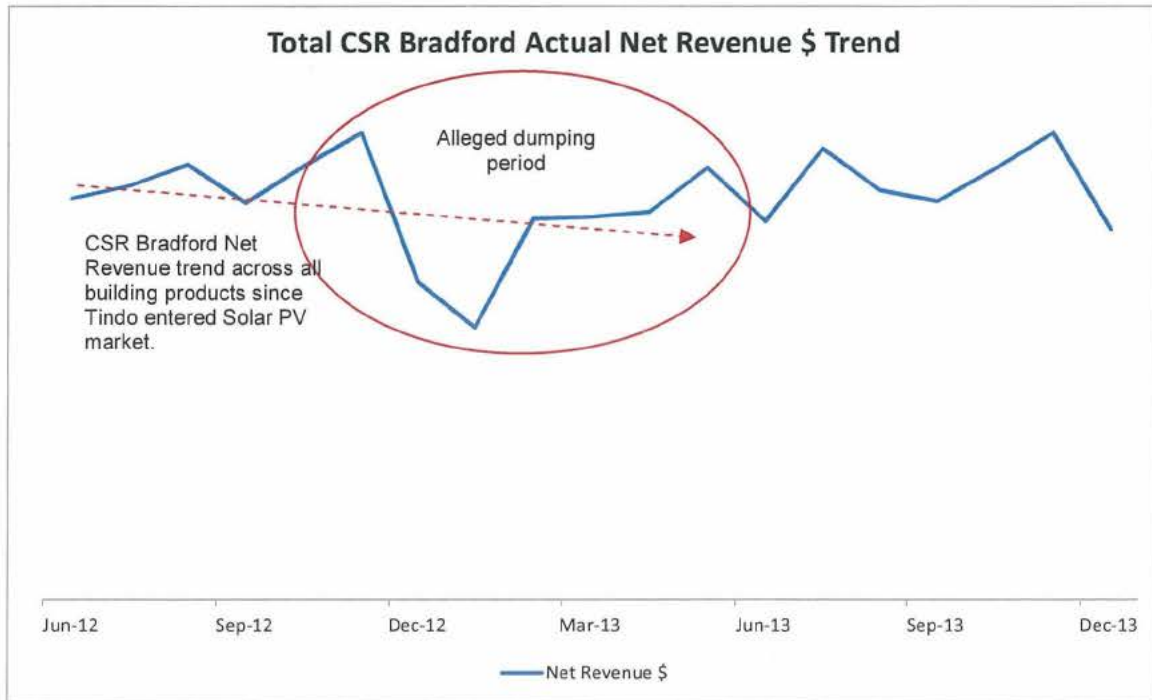
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Australian Industry sales volume (units, all products) of the goods and total Australian market size since 1 July 2012 (Source: Confidential Appendix A2)

In its application, Tindo alleges that its sale volumes during financial year 2013 were adversely affected by specific price dumping.

CSR Bradford would interpret the Solar PV sales volume and revenue decline it experienced, as well as that of Tindo / the industry, as being more reflective of the broader building materials market dynamics as a whole, and the Australian economy at the time. That trend is consistent with the sales revenue of Bradford's total portfolio of building products for that period, of which the solar category represents less than 4% of the total.



Conclusion.

To consider the performance of Tindo Solar as being representative of the Australian Solar PV Industry in isolation, and then to correlate that performance to "Price Dumping" from a few overseas manufacturers, without considering the total building products market dynamics at the time, is a very limited view to take.

From the trend information displayed above, from the time Tindo entered the market place (July 2012) through to June 2013, the total Solar PV market (including Tindo and CSR Bradford) experienced a general decline, as did the broader building products sector.

It is our opinion that the competitive sourcing and pricing of solar PV panels from the global market where operating efficiencies and economies of scale already exist, is good for the Australian consumer. To selectively impose duties or tariffs on importers in the current free market economy is not an efficient manner to stimulate any Australian manufacturing capability in Solar PV. As the technology becomes more efficient and further competition grows, the more price competitive offers will become and the greatest benefit can be generated for both the environment and consumers.

Yours sincerely,

Alistair Dock
General Manager Finance.
CSR Bradford.