

Received 7 August 2014

Ms Joanne Reid  
Anti-Dumping Commission  
Customs House  
5 Constitution Avenue  
Canberra City ACT 2601

30/07/2014

Your reference: ADN 2014/38

Dear Joanne

Solar4Ever is a relatively small retailer and installer of solar (PV) in Perth, Western Australia.

We have recently become aware of the Anti-Dumping Commission's investigation into alleged dumping of Chinese made panels into Australia following an application by Tindo Manufacturing Pty Ltd (Tindo)

We do not accept that Tindo are a genuine manufacturer. All the critical components of a solar module, the all-important solar cell, the backsheet, glass and frame are all imported into Australia by Tindo. Tindo simply do some soldering and assembly. We struggle to understand how more than 50% of the cost of manufacture is incurred in Australia from an automated soldering and assembly line, which in its self does not in our opinion, constitute a substantial process. On this basis alone the application by Tindo should be dismissed.

We also consider that Adrian Ferraretto the founder of now collapsed solar retailer Solar Shop and Director of Tindo had sufficient knowledge of the solar industry to understand that in June 2012 when Tindo opened for business, the market conditions in the solar industry were substantially weaker than in the preceding 18 months due to an overall downturn in the building industry, and the removal of significant state and federal incentives for solar, and that any losses that Tindo may have incurred were mostly if not entirely due to these factors, not the alleged dumping of Chinese modules.

Tindo made a decision to enter the market with an AC panel. We have also had AC modules available for sale to customers for many years, and we found that due to the significantly higher cost due to an individual micro inverter on each module, and no perceptible performance advantage, our customers have overwhelmingly rejected AC modules in favour of DC modules. Not just DC modules made in China, but DC modules made in Europe too.

If Tindo made a decision to supply a product that the vast majority of Australian customers are not interested in purchasing, then if they incurred losses, then we believe that those losses have more to do with poor business decision-making than the price of DC modules imported into Australia.

We also note that this Australian anti-dumping investigation, unlike those conducted in Europe and North America, does not include the solar cells which are, after all, by far and away the most

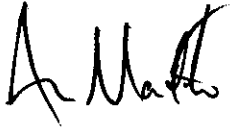
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important component of a solar module. Without the solar cell, a solar module is barely anything more than a window pane. As Tindo are an importer of solar cells, this glaring omission from their complaint seems to be an attempt to 'game the system'.

Yours sincerely

A handwritten signature in black ink, appearing to read 'A MacKeith', written in a cursive style.

Andrew MacKeith

Director

Good Day Mate Pty Ltd, trading as Solar4Ever