



SOLAR GODS

RV Solar Supplies

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The Director
Operations 3
Level 5 Customs House
Anti-Dumping Commission
5 Constitution Avenue
Canberra City, ACT 2601

Submission from Solar Gods

Re: Investigation ADC 239 – alleged dumping of PV Modules and Panels being exported from China

To The Director of The Anti-Dumping Commission,

Solar Gods (Spencerbeams Pty Ltd) was established in March 2012 to meet a growing demand for recreational solar panels and solar products for the outdoor recreation market (camping, caravanning, marine and 4x4) for the application of charging 12 volt lead-acid batteries. We import extra low voltage (12 volt) folding and fixed PV solar panel kits (<180W in size) from two Chinese manufacturers. These kits are custom made to our specifications.

We are a small but growing company operating as a wholesale distributor primarily to RV manufacturers and retailers. We also have a retail e-commerce website to satisfy retail customers who are typically RV owners and campers.

At no time has Solar Gods been involved in the grid connected, 240 volt domestic or commercial solar industry, either as a supplier, designer or installer. We made a conscious choice at the outset to steer clear of the 'rooftop' industry and set out to forge a name for ourselves in the outdoor recreation market which demands 12 volt solar panels and products less than 200W in size.

Our Products

The folding and fixed PV solar panel kits that we supply are small in sizes and power compared to those found in the rooftop residential and commercial solar market.

Our 120W and 160W folding solar panel kits for RV's are comprised of two 60W panels and two 80W panels respectively, attached together via a hinge and latches. The kit is also fitted with support legs, a solar charge controller and 10 meter cable with connectors to connect directly to a 12V battery.

Our 80W, 120W and 150W fixed solar panel kits for RV's are comprised of a regular solar panel together with cable, ABS mounting brackets (for attachment to the RV roof) and a solar charge controller.

Neither of our products are intended or designed for rooftop solar systems in any way.

The table below summarises the folding and fixed solar PV kits supplied by Solar Gods to the Australian market.

MODEL	DESCRIPTION	POWER (W)	CELL TYPE	CELL COUNT
SG-120W-FOLD	120W Mono, Folding Solar Panel Kit	120	Cut down 5"	36-cell (x2)
SG-160W-FOLD	160W Mono, Folding Solar Panel Kit	160	Cut down 5"	36-cell (x2)
SG-80W-FIXED	80W Mono, Fixed Solar Panel Kit	80	5"	32-cell
SG-120W-FIXED	120W Mono, Fixed Solar Panel Kit	120	5"	48-cell
SG-150W-FIXED	150W Poly, Fixed Solar Panel Kit	150	6"	40-cell

Our solar panels are comprised overwhelmingly of 5" mono-crystalline cells using less than 48 cells per panel.

Tindo Manufacturing

Our understanding is that Tindo, who is the applicant for this anti-dumping investigation, produces nominally 250W poly-crystalline solar panels using 60 x 6" cells intended for rooftop and utility scale PV systems.

MODEL	DESCRIPTION	POWER (W)	CELL TYPE	CELL COUNT
Tindo	Karra 250W Poly panel	250	6"	60-cell

We argue that Tindo's solar panels are not 'like goods' to that required for the outdoor recreational solar market nor 'like' the goods that we import and supply. We also believe that our goods cannot be produced by Tindo at their manufacturing premises in Australia.

On this basis we believe that Solar Gods poses no commercial threat to Tindo.

Conclusion

It is the belief of Solar Gods that Tindo does not manufacture 'like goods' to the solar PV modules and panels that are required by the end users in the outdoor recreational solar markets and bear little resemblance to the goods that Solar Gods supplies. Tindo appears to be solely focused on supplying the domestic rooftop and utility scale solar markets.

As such, we request that Solar Gods be exempt from any levy that is applied as a result of the investigation into alleged dumping of crystalline silicon solar PV modules and panels exported from China.

Sincerely,



Spencer Smith
Managing Director - Solar Gods