

15 August 2014

**EXPERTS FOR THE SOLAR AGE.**



Photon Energy Australia Pty Ltd | 204 / 55 Grafton Street | Bondi Junction NSW 2022 | Australia

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

Sydney 14-08-14

**Non-Confidential - For Public Record**

**End User Submission to the Dumping Investigation ADC 239 – PV  
Modules or panels being exported from China**

**Dear Madam/Sir,**

Photon Energy Australia Pty Ltd is a solar power company with substantial Australian ownership and a global business specialising in the delivery and maintenance of high quality commercial scale solar power and battery storage systems for large power consumers. We have in excess of 100MW of experience in construction and long term operation of solar power plants and procure solar panels from manufacturers across the globe, including high quality integrated solar manufacturers from China, the names of some of which have been included in the dumping investigation.

We fundamentally question if Tindo Solar modules can be considered “like goods” to solar modules supplied by integrated solar manufacturers in China for the following reasons:

1. Non-integrated manufacturing: Tindo Solar assembles solar panels primarily from imported components in contrast to integrated manufacturing encompassing the whole process from raw silicon to ingot to cell to solar module of the top tier companies from China. Integrated manufacturing is a key aspect of cost effective

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production and aids in achieving consistently high product quality. From long-term experience Photon Energy has procedures in place requiring the use of approved fully integrated solar manufacturers, many of the largest of which are from China.

2. **Product Range:** Tindo Solar does not produce the types of solar panels utilised by Photon Energy in its solar systems. Tindo's 60 Cell polycrystalline 250 Wp Karra AC module with integrated micro-inverter is targeted to a different market segment. Photon Energy primarily utilises DC solar modules for larger scale projects. We also utilise a range of poly and mono-crystalline DC modules of different formats in the range of 250 to over 300Wp outputs depending on specific project requirements. Tindo does not produce these DC polycrystalline, mono-crystalline or larger format solar modules.
3. **Quality Certification:** Tindo Solar has not as yet certified its quality management system. Photon Energy Australia has a certified Integrated Management System covering ISO 9001, ISO 14002 and OHSAS18001. It is a requirement of Photon Energy that solar modules and other components are supplied by manufacturers with at least the same level of certification. We have several approved certified manufacturers from China.
4. **Product Warranty:** Tindo Solar has a stepped warranty, and as yet does not provide a more valuable linear product warranty. Also, Tindo's warranty is not supported by a sufficient credit rating or 3<sup>rd</sup> party insurance that would give our financiers and customers comfort in the warranty. It would therefore be difficult for Photon Energy to secure financing for projects using Tindo Solar panels.

We believe that Tindo Solar's complaint is not in the best interests of the broader solar industry in Australia. As Tindo Solar's product and the local production capacity is only able to satisfy a very small proportion of the Australian solar PV market there is a major risk of an outcome which would be to the detriment of the solar industry as a whole.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'M. Gartner', written over a light blue horizontal line.

Michael Gartner  
Managing Director  
Photon Energy Australia Pty Ltd