

1 October 2015

This submission is made to the Anti-Dumping Commission (Commission) with regard to the alleged dumping of certain crystalline silicon photovoltaic (PV) modules or panels exported from the People's Republic of China.

Cost to make and Sell

In its submission of 23 September 2015 Trina Solar included a table that allegedly demonstrated a significant increased production quantity and reduced cost of production over the IP in respect of poly modules.

Below is a table showing Trina's financial results¹ for the calendar years that:

- Tindo developed its business plan;
- commenced sales to wholesalers; and
- switched its business model from wholesalers to end users.

The table clearly shows increased shipments (reflecting increased production), variable revenue, declining Average Selling Prices (per watt) as well as declining Operating Income and declining Net Income.

Tindo	Develop Business Plan				Sales commence (wholesale)				Switch from wholesale to direct				Investigation Period
	2011				2012				2013				
Trina Solar Ltd	Qtr 1 2011	Qtr 2 2011	Qtr 3 2011	Qtr 4 2011	Qtr 1 2012	Qtr 2 2012	Qtr 3 2012	Qtr 4 2012	Qtr 1 2013	Qtr 2 2013	Qtr 3 2013	Qtr 4 2013	Jul 2012 to Dec 2013
Shipments MW	320.4	396.0	370.0	425.0	380.0	418.8	380.0	414.5	392.6	646.6	774.6	770.1	3,378.4
Revenue (US Million)	550.9	579.5	481.9	435.7	349.9	346.1	298.0	302.7	260.2	440.7	548.4	525.6	2,375.6
Cost of Revenue	399.6	481.1	429.9	404.7	329.6	317.1	295.6	297.1	255.8	389.5	465.0	446.5	2,149.5
Gross Profit (US Million)	151.3	98.3	52.0	31.0	20.3	29.0	2.4	5.6	4.4	51.2	83.4	79.1	226.1
Operating Expenses	66.8	65.5	75.5	93.9	60.1	107.6	78.3	76.1	44.5	75.1	77.4	65.0	416.3
Operating Income (US Million)	84.5	32.8	-23.5	-62.9	-39.9	-78.6	-76.0	-70.4	-40.1	-23.9	6.0	14.1	-190.2
Net Income (US Million)	47.7	11.8	-31.5	-65.8	-29.8	-92.1	-57.5	-87.2	-63.7	-33.7	9.9	9.6	-222.6
Gross Margin (%)	27.5	17.0	10.8	7.1	5.8	8.4	0.8	1.9	1.7	11.6	15.2	15.1	9.5
Operating Margin (%)	15.3	5.7	-4.9	-14.4	-11.4	-22.7	-25.5	-23.3	-15.4	-5.4	1.1	2.7	-8.0
Net Margin (Net Income/Revenue) (%)	8.7	2.0	-6.5	-15.1	-8.5	-26.6	-19.3	-28.8	-24.5	-7.6	1.8	1.8	-9.4
Net Interest Expense (US Million)	6.7	7.2	9.7	8.3	8.8	9.3	13.8	11.4	13.2	11.0	12.0	8.2	69.6
Average Selling Price/unit (US \$/Watt)	1.72	1.46	1.30	1.03	0.92	0.83	0.78	0.73	0.66	0.68	0.71	0.68	0.70
Gross Profit/unit (US \$/Watt)	0.47	0.25	0.14	0.07	0.05	0.07	0.01	0.01	0.01	0.08	0.11	0.10	0.07
Operating Income/unit (US \$/Watt)	0.26	0.08	-0.06	-0.15	-0.10	-0.19	-0.20	-0.17	-0.10	-0.04	0.01	0.02	-0.06
Net Income/unit (US \$/Watt)	0.15	0.03	-0.09	-0.15	-0.08	-0.22	-0.15	-0.21	-0.16	-0.05	0.01	0.01	-0.07

Table 1 - Trina Solar Ltd Financial Results

Significantly, Trina made substantial **losses** for the first four quarters of the investigation period with marginal returns in the final two quarters.

¹ <http://ir.trinasolar.com/phoenix.zhtml?c=206405&p=irol-reportsOther>

Tindo rejects Trina’s claim that

The principal reason for undumped prices substantially undercutting Tindo’s selling prices being below its CTMS and hence causing it material injury is the large comparative cost advantage of China in the production of the subject merchandise. This large comparative cost advantage is primarily due to economy of scale...²

Firstly, Tindo rejects that Tindo’s prices were undercut by undumped prices and secondly, the claim of a comparative cost advantage due to economy of scale is not supported by Trina’s own financial information which clearly shows that Trina’s price advantage is due it making **losses** for eight consecutive quarters.

In terms of the Australian investigation period, whilst Tindo notes that there was an improvement in Trina’s Gross Margin the **Net Margin** was **-9.4%**. Trina’s financials clearly show that the **full cost for Trina to make and sell** its photovoltaic products is above its sales revenue.

Tindo notes that the average selling prices in the table reflect the average selling prices of the Chinese Exporters in the Australian market. Given that the volume of Trina’s sales to Australia would be around 7%³, how is it that the Trina units that were sold to Australia at prices similar to those in the above table were profitable (that is, the full cost to make and sell was less than the sales revenue) given that during the investigation period Trina made a loss of 9.4% on all of its overall sales?

As outlined in its dumping application and submission of 4 May 2015, Tindo submits that the loan and credit agreements of the Chinese banks to the Chinese solar companies have resulted in an oversupply which led to dramatic reduction in prices resulting in the Chinese Solar companies going from profit-making businesses in 2010 to loss making businesses in 2011.

The table below clearly demonstrates that this is exactly what happened to Trina Solar.

Trina Solar	2010	2011	2012	2013
Net Income/Loss (USD Million)	311.453	-37.82	-266.555	-77.73

Tindo submits that the predatory price advantage of the Chinese suppliers on the Australian market during the investigation period was due to an oversupply following an increase in production capacity sending the price per

² Trina Solar submission dated 28 September 2015

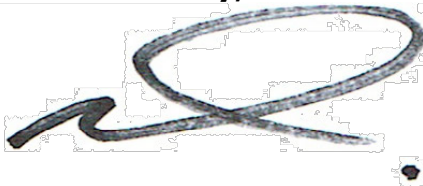
³<http://reneweconomy.com.au/2013/trina-solar-24289>

watt to plunge. Tindo's claim is supported by the attached article from Bloomberg, dated September 2012, which states that the Chinese module price plunged about 35 percent to US 77 cents a watt from a year earlier.

Causal Link

Tindo refers to its submissions of 4 May 2015, 2 July 2015, 31 August 2015, 7 September 2015, 18 September 2015 and 23 September 2015 which have demonstrated that the **injury** to Tindo **caused by dumping** during the investigation period **is material** and that material injury is still being caused by dumped goods.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Adrian Ferraretto', with a small blue square icon at the bottom right of the signature.

Adrian Ferraretto
Managing Director

China Development Bank Renews Solar Support, Journal Says

September 25, 2012 — 10:04 PM AEST

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Sept. 25 (Bloomberg) -- China Development Bank Corp. plans to renew a pledge of support for 12 solar companies, an indication the government is pressing for consolidation within the industry that's suffering from excess capacity.

The state-owned lender is preparing to recommend stronger financial support for Suntech Power Holdings Co., Trina Solar Ltd. and Yingli Solar Co., the official China Securities Journal reported, citing an unidentified person. It also named Hareon Solar Technology Co., Shanghai Chaori Solar Energy Science & Technology Co. and Sungrow Power Supply Co., without disclosing the other six companies in line for priority funding.

The disclosure may point to a lever the government will use to ensure the companies that dominate the global solar industry survive a 44 percent plunge in cell prices in the past year that has gutted margins across the industry. Neither the bank nor the companies named confirmed the report.

“This is important to the industry that only 12 selected companies can receive state

support, indicating the government's intention to speed up industry consolidation," said Jessica Ng, an industry analyst at Bloomberg New Energy Finance in Beijing. "It seems like Suntech, Trina, and Yingli will survive from this with, while LDK may be struggling to get on the list."

Solar Support

China Development Bank has extended \$43.2 billion in credit lines to 12 Chinese solar companies since 2010, according to data compiled by New Energy Finance. That helped ensure Suntech, Trina and Yingli became three of the world's top five solar module makers, pushing out German and Japanese companies that formerly led the industry.

Not included in today's report were LDK Solar Co. Ltd., JinkoSolar Holding Co. Ltd. and JA Solar Holdings Co. Ltd., which also rank among the top 10.

The report may indicate how the government will support recommendations from the State Council in July that set a target for raising the country's solar installations to 50 gigawatts in 2020 from about 3.6 gigawatts now.

The Securities Journal, founded by the state-run Xinhua News Agency, said China Development Bank will soon submit the recommendations to the National Development and Reform Commission for approval.

Control on Loans

Lending to the rest of the industry will be strictly controlled and the bank won't provide financing solely for the expansion of manufacturing capacity, the newspaper said.

As state policies encourage consolidation among China's solar companies, the bank will support acquisitions of smaller firms by larger ones, the Securities Journal said.

Two calls to Feng Qihua, a spokeswoman for China Development Bank in Beijing, went unanswered. Suntech's spokesman Rory Macpherson declined to comment. Two calls and an e-mail to Yingli officials weren't returned.

The solar industry is grappling with an oversupply after Suntech and its rivals boosted production capacity, sending the cost of panels tumbling. The average Chinese module price has plunged about 35 percent to 77 cents a watt from a year earlier, according to Bloomberg New Energy Finance data.

The European Union on Sept. 6 opened a probe into whether Chinese manufacturers of solar modules sell products at a loss, following a U.S. decision earlier this year to hit the Chinese industry with anti-dumping duties as high as 250 percent.

To contact Bloomberg News staff for this story: Aipeng Soo in Beijing at asoo4@bloomberg.net; Henry Sanderson in Beijing at hsanderson@bloomberg.net

To contact the editors responsible for this story: Chitra Somayaji at csomayaji@bloomberg.net; Reed Landberg at landberg@bloomberg.net

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