



7 August 2024

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Anti-Dumping Commission  
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## Public File

### Continuation 651 – Silicon metal from the People's Republic of China

#### 1. Introduction

Solquartz Pty Ltd (**Solquartz**) refers to the silicon metal continuation inquiry and provides this submission as an interested party regarding the Australia competitive landscape for the silicon metal goods in question and the future of this important market.

#### 2. About Solquartz

Solquartz is an Australian company developing a metallurgical silicon (MG-Si) processing plant at the Lansdown Eco-Industrial Precinct in Townsville, Queensland.<sup>1</sup> In late 2023 Quinbrook Infrastructure Partners (Quinbrook) fully acquired Solquartz, and it was integrated into the proposed \$8 billion Project Green Poly at the Lansdown Eco-Industrial Precinct near Townsville in Queensland. As part of Quinbrook's investment, the Solquartz MG-Si processing plant will feed one of the world's largest polysilicon facilities. As recently reported:<sup>2</sup>

*Australian-owned Quinbrook Infrastructure Partners announced its \$8 billion plans to build the first ever Australian polysilicon production plant on Tuesday, alongside the news it has secured a place to build it – in Townsville, in Queensland's north.*

*Quinbrook has been allocated a 347 hectare parcel of land at the Lansdown Eco-Industrial Precinct, which Townsville City Council is developing into an environmentally sustainable manufacturing, processing and technology hub.*

*Quinbrook proposes to use the Lansdown allotment to house a "state-of-the-art" polysilicon manufacturing facility, itself powered by a large-scale solar and battery storage project it plans to build on land adjacent to Lansdown.*

*Further, Quinbrook says it will partner with Solquartz, which itself has land set aside at Lansdown to develop a metallurgical silicon metal processing plant – a deal that would ultimately see Solquartz integrate its project into Quinbrook's larger facility.*

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<sup>1</sup> <https://www.solquartz.com.au/>

<sup>2</sup> [Cashed-up Quinbrook reveals \\$8bn plan to kick-start Australian solar supply chain | RenewEconomy October 31, 2023.](#)



The main market for the project is polysilicon, but silicon materials from local quartz are also useful for silicon battery anodes. Polysilicon is used for Czochralski ingot manufacturing, the precursor to solar wafers and solar cells. We will power these processes with solar PV energy, wind energy, and batteries, maximising our use of clean renewable energy hence supporting future demand for polysilicon.

The global demand for solar PV technology, with an estimated 2.5 million megawatts forecast to be installed between 2023 and 2030<sup>3</sup>, is substantial, resulting in a corresponding increase in the demand for silicon metal and polysilicon. Markets beyond China are seeking ethically and environmentally responsible solar PV supply chains, necessitating significant investments in new facilities.

This project aligns well to the Government’s policies to make Australia a renewable energy superpower, to process critical minerals here in Australia, and to extract more value in onshore supply chains. There is significant potential to make Australian economic impact from locally produced metallurgical silicon as can be seen in the quartz to solar silicon supply chain.

Table of onshore value creation – Quartz to solar silicon supply chain<sup>4</sup>

Silicon material	Price AU\$/kg	Ratio to quartz	Ratio this step to previous step	Energy/material efficiency gain for co-location
Quartz	0.11	1	1	-----
MG-Si	6	56x	56x	High
Polysilicon	31	282x	5x	High
Solar cells	100	900x	3.2x	Moderate (to wafer step)

There are well publicised reports from price data providers about massive Chinese overcapacity in polysilicon and MG-Si production and its effect on Chinese domestic prices.

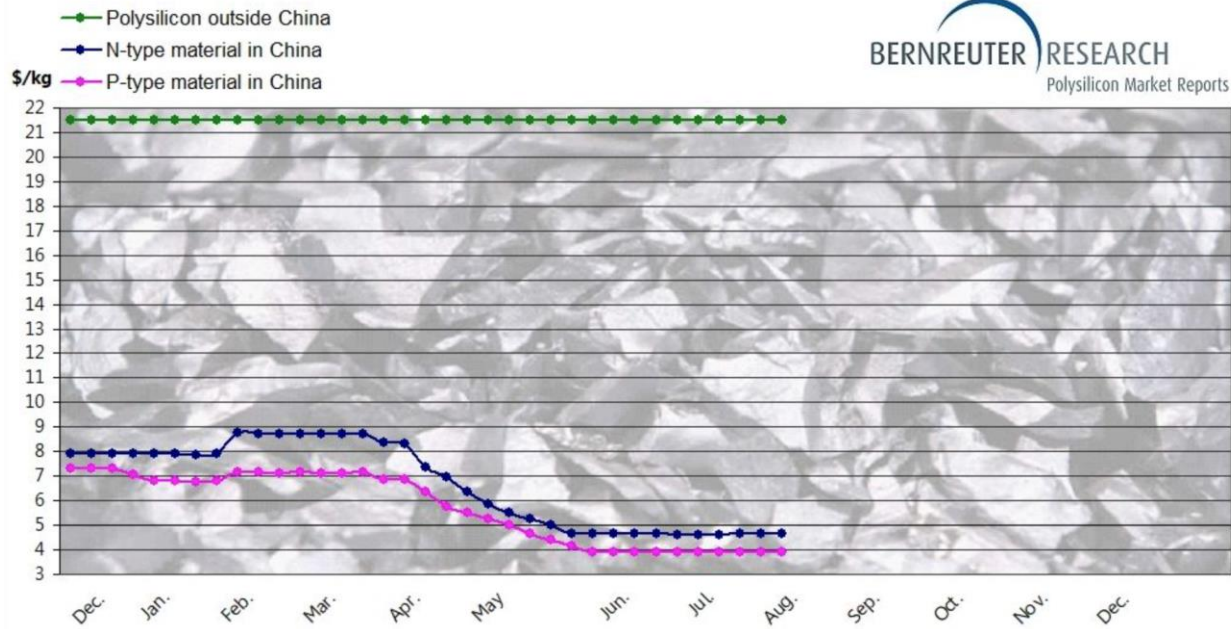
EnergyTrend’s polysilicon price indices right now for China have been unchanged at CNY38/kg (including 13% value added tax, equivalent to US\$4.66/kg without VAT) for n-type material and CNY32/kg (US\$3.92/kg without VAT) for dense mono-grade polysilicon (p-type material). The price for polysilicon outside China is seen stable by all data providers this week, with InfoLink’s index still standing at its long-time level of US\$21.50/kg demonstrating the massive market separation between China domestic price and other international manufacturers.

<sup>3</sup> [Wood Mackenzie: Global Solar PV Forecasts](#)

<sup>4</sup> [Private Energy Partners: Internal research](#)



Table of EnergyTrend's polysilicon price indices for China<sup>5</sup>



Approximately 1.2kg of MG-Si feedstock is required to produce 1kg of polysilicon. This makes the China domestic MG-Si and polysilicon markets highly correlated.

Quinbrook, through its wholly owned development arm Private Energy Partners has already made several positive steps in progressing Project Green Poly. These include:

- Negotiated exclusive right for the development of mining capacity that will supply the silicon metal facility with sufficient quartz for more than 30 years of production;
- Analysed and confirmed the supply of other key inputs and logistics arrangements;
- Signed option to lease agreement for 347 ha of High Impact Industrial Zoned land for the silicon metal and polysilicon facilities;
- Optioned land and initiated the development of the Woodstock Renewable Energy Hub a large solar farm and battery storage project adjacent to provide power to the silicon metal and polysilicon facilities; and
- Commenced the Powerlink grid connection process for access to the adjacent 275kV transmission line.

The magnitude of this project is immense, involving billions of dollars in capital investment and employing thousands of workers during the construction phase. Furthermore, the industrial investment is projected to generate substantial annual export income and deliver extensive benefits to local businesses in various sectors such as mining, transportation, engineering, construction, and support services. Deloitte Access Economics has modelled the social impact, and they estimate that the project will deliver \$17.6 billion present value (discounted 7%), or an average of \$1.7 billion per year in additional Gross Regional Product to 2058. Furthermore, it is estimated to provide over 2,100

<sup>5</sup> <https://www.linkedin.com/company/bernreuter-research/posts/>



net additional Full-Time Equivalent (FTE) jobs to Townsville, on average, once the project reaches full production, with the facility expected to operate for 30 years or more.<sup>6</sup>

The scale and complexity of Project Green Poly is comparable to other Quinbrook projects. Quinbrook specialises in large scale projects delivering renewable power solutions for energy intensive customers. Quinbrook is currently developing and constructing a number of milestone projects including recently completing the largest solar + storage projects ever undertaken in both the US (Project Gemini US\$1.2 billion) and the UK (Project Fortress GB£350 million) as well as commencing construction of the largest 'green data centre' and battery storage precinct in the southern hemisphere (Project Supernode AU\$2.5 billion). Quinbrook's Australian investment portfolio also includes the onshore development component of SunCable, the world's largest solar/battery project, and the recently announced sponsorship of the Green Iron Project in Gladstone, Queensland. For each project, Quinbrook is committed to working with local businesses and communities to deliver significant local benefits.

Ensuring a level playing field in the Australian market, free from dumped, subsidised and materially injurious Chinese imports of MG-Si, is therefore of critical importance to Solquartz and the ambitions of the Australian Government.

### **3. The Australian industry's claim for measures continuation**

Solquartz has reviewed the continuation application made by Simcoa Operations Pty Limited and material published on the Commission's electronic public record. Solquartz fully supports the Australian industry applicant in its position that, in the absence of continued trade measures against China, it will revert to and continue to cause material injury to the Australian silicon metal industry.

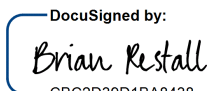
Solquartz submits that there is no doubt that the removal of dumping and countervailing duties from China would significantly impede the ability of the Australian industry to maintain a viable and substantially expanding sovereign manufacturing capability and compromise the investibility of Project Green Poly. As has been well-publicised, the establishment of solar supply chains is of critical importance to Australia's shift to renewables. Future development of silicon metal in Australia will support our nation's expansion of solar photovoltaic (PV) energy generation, an expansion of which cannot and should not be compromised by unfair import competition.

### **4. Conclusion**

Solquartz submits that the likely deleterious impact of silicon metal from China on the domestic Australian industry would be significant if the anti-dumping measures are allowed to expire. Solquartz would welcome further engagement with the Commission on this matter and will make further representations when required during the course of the continuation inquiry.

Should you have any queries in relation to this submission, please do not hesitate to contact me.

Kind regards,

DocuSigned by:  
  
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Brian Restall  
Director – Solquartz Pty Ltd

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<sup>6</sup> [Lansdown-Eco-Industrial-Precinct-Project-Overview.pdf \(townsville.qld.gov.au\)](#)