

23 June 2013



Canadian Solar (Australia) Pty Ltd

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23rd June 2014

Australian Anti-Dumping Commission
Customs House
5 Constitution Avenue
Canberra - ACT 2601

Electronic Submission

Non-Confidential

Canadian Solar Inc Submission to the Anti-Dumping Commission

AD Case #239 – Investigation into the alleged dumping of certain crystalline silicon PV modules or panels exported from the People's Republic of China.

This submission by Canadian Solar Inc. requests immediate exclusion of the following PV modules or panels from the goods under consideration ("GUC"):

1. High-efficiency PV modules or panels with back-surface cells, such as our ELPS CS6P-MM and CS6K-MM products; and
2. PV modules or panels with less than 100 Watts power capacity, used i.e. for our ANDES and MAPLES system; and
3. Any module or panel with a customized frame, such as our New Edge product;
4. PV modules or panels with a nameplate capacity of 300 Watts or greater; and
5. PV modules or panels with a nameplate capacity not produced by Tindo Manufacturing Pty Ltd ("Tindo") and not certified and listed by the Clean Energy Council ("CEC").

The following Tindo modules or panels are approved by the CEC under Certificate # 40035098:

<http://www.solaraccreditation.com.au/solar-products/modules/building-approved-modules.html#searchResults>

The Clean Energy Council maintains the database and website listing of AS/NZS 5033-compliant photovoltaic (PV) modules. PV modules installed in Australia must be certified and approved to AS/NZS 5033 photovoltaic installations. This standard is called up by AS 3000, which is legislated in each state. Section 4 states that crystalline PV modules shall be compliant with IEC/EN 61730 and IEC/EN 61215.

There is compelling evidence that Tindo is not certified to produce PV modules or panels with the above mentioned specifications and characteristics (items #1-#5) and Canadian Solar requests immediate exclusion of the said modules or panels from the GUC.

Three submissions from Infigen Energy (posted to the Commission on the 12th June 2014), Trina Solar Energy Co Ltd (posted to the Commission on the 18th June 2014) and CEC (posted to the Commission on the 23rd June 2014) have already made it clear that Tindo does not manufacture “Like Goods” to the above mentioned modules or panels, nor has received certification by the CEC.

It is evident that Tindo’s certified PV modules or panels are not interchangeable with the above listed PV modules or panels of which exclusion is sought. Any change in the manufacturing process, i.e. lower and/or higher nameplate capacity per module or panel or different components such as cells and frame will result in a lengthy and costly testing and certification process.

Canadian Solar Inc recommends that the Commission considers “Like Goods” on the basis of the available international certificates, such as International Electrotechnical Commission (“IEC”) (either by TUV, VDE or any other accredited testing body), for the respective PV module or panel under investigation.

Any PV module or panel from Canadian Solar Inc which complies with international and Australian standards and is listed on the CEC accreditation website, whereas Tindo does not produce the said PV module or panel or does not have CEC accreditation for the product, should be immediately excluded from the GUSC as it is unreasonable to include such products which are clearly not “Like Goods”.

Please contact us anytime if you require additional information or have questions. We’ll welcome your response to this submission.

Yours sincerely,

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Electronic Signature

Daniel Ruoss

Country Manager