

EXECUTIVE SUMMARY

OF THE ANTI-SUBSIDY EXPIRY REVIEW REQUEST CONCERNING ANTI-SUBSIDY MEASURES APPLIED TO IMPORTS OF SOLAR GLASS FROM CHINA

A. THE PRODUCT CONCERNED

1. The product concerned is solar glass consisting of tempered soda-lime-flat-glass, with an iron content of less than 300 ppm, a solar transmittance of more than 88%, a resistance to heat up to 250°C, a resistance to thermal shocks of $\Delta 150\text{K}$, having a mechanical strength of 90 N/mm² or more originating in PRC.
2. The product concerned is classified under CN/TARIC Code 7007 19 80.
3. Solar glass can be patterned or non-patterned, with either a transparent or diffuse surface or a variety of edgeworks. There can be different patterns on both sides of the glass or it can be just single-sided patterned. Solar glass may have drillings, and can also be printed through the application of, for example, ceramic colours. Treatments may be applied to the surface of the solar glass in combination with different technologies. The main one is an anti-reflective coating applied before or after the tempering process to reduce the amount of sunlight reflected off the solar panels so capturing more of the sun's energy and delivering higher output gains. Over the last three years, anti-reflective solar glass has largely replaced uncoated solar glass as the industry standard. Both EU and Chinese production of solar glass are exclusively anti-reflective coated.
4. The raw materials for the production of the product concerned are mainly low-iron sand and other low-iron raw materials, *e.g.*, dolomite, calcite, soda, and feldspar, and low-iron cullets, contributing primarily silicon dioxide, sodium dioxide, magnesium dioxide, and calcium dioxide.
5. The production process starts when these raw materials are melted with cullets in a refractory tank at temperatures of about 1500°C. The liquid glass is then formed (rolled) between two water cooled steel/ alloy rollers. These rollers can have a negative pattern that is imprinted into the liquid glass. Alternatively, it is formed on a liquid tin bath (floated). A continuous, infinite glass ribbon is formed. This ribbon is cut either continuously or discontinuously (online or offline) to individual sizes. After cutting of the unrefined glass, the glass edge is grinded, and the glass is washed and afterwards tempered.

B. LIKE PRODUCT

6. The solar glass made by the EU producers is of the same type and characteristic as solar glass imported from China. The EU and Chinese products share the same basic physical, chemical and technical characteristics. Consequently, all types of solar glass are covered by the definition of the product concerned that the Complainants propose and should be considered alike within the meaning of Article 2(c) of the Basic Regulation.

C. PRODUCT UTILISATION

7. Solar glass is one of the components for making crystalline silicon photovoltaic modules and thin film photovoltaic modules to produce electricity, as well as flat photothermal energy collectors used, for example, to generating hot water. Even different types of solar glass all share the same basic physical and technical characteristics and are basically used for the same purposes.

D. THE PETITIONERS

8. The Request is brought by EU Pro Sun Glass, an *ad hoc* trade association of EU producers of solar glass, on behalf of two EU producers of solar glass. These producers collectively represent more than 25% of EU production of solar glass in 2018 that is sufficient to meet the standing requirement.

E. CASE SUMMARY

(i) The Continuation of Subsidization

9. The Government of China (“GOC”) continues to heavily subsidise Chinese solar glass producers. The Complainants have collected evidence reasonably available and request that the Commission fully investigate each of the mentioned subsidy programmes along with any other countervailable subsidy programmes from which Chinese producers may be continuing to obtain benefits.
10. As an effect of numerous subsidies, China is one of the leading global exporters of PV solar glass. China’s 13th Solar Energy Development Five-Year Plan (“FYP”) (2016-2020) was adopted by the National Energy Administration on 8th December 2016 and established targets for solar energy deployment until 2020. The 13th FYP highlights the strategic vision of the GOC for manufacturing and shows the continued commitment of the GOC to supporting the industry concerned. Under the 13th FYP, the solar glass industry is still classed as an encouraged sector enabling Chinese producers of the product concerned to benefit from various tax and other preferential policies within China.
11. The anti-subsidy Request contains evidence of the continuation of subsidization of the solar glass business in China through the following schemes and programmes:
 - The tax incentives and reductions for the High and New Technology Enterprises;
 - Reductions for the purchasing of Chinese-made equipment;
 - The duty-free import process of R&D equipment;
 - R&D expense offsets;
 - One-off refund of excess input VAT credit;
 - Other programmes providing reduced corporate tax rates;
 - Tax preference policy of the Northeast;

- Tax preference policy of Guangdong;
- Tax preference policy of the Central and Western Regions;
- Dividend exemption between Qualified Resident Enterprises;
- Concessions on VAT and customs duty;
- Deferral of payment of tax on dividends;
- The preferential policy loans and other financing;
- The continuation of direct grant programmes;
- Government provision of power for less than adequate remuneration;
- Government provision of land for less than adequate remuneration;
- Export seller's credit;
- Export buyer's credit;
- Export guarantees and insurances for green technologies; and
- Outward foreign direct investment support.

(ii) Injury Suffered by the EU Solar Glass Industry

12. The EU solar glass industry recovered significantly in 2016 from the injury previously inflicted by subsidised imports of solar glass from China. Despite that fact, the EU solar glass industry remains in a fragile condition. Given the low level of Chinese import prices and the large overcapacity built in China over last few years in the solar glass business, there is clear evidence of the recurrence injury if the European Union terminates the anti-subsidy measures that are currently in force.
13. Over the last three years, the EU industry was able to regain market share because of the effectiveness of the combined anti-subsidy and anti-dumping duties. The anti-subsidy duties are restoring the Chinese import prices to the fair and adequate level but the Complainants have provided evidence of Chinese import prices far below their own costs of production. Given these excessive low price levels offered by Chinese exporters and the large volume of solar glass, the recurrence of the injury is certain if the EU does not extend the measures.

(iv) Causal Link Between Chinese Imports and the EU Industry's Injury

14. The performance of the Union industry improved due to anti-subsidy duties. Since that time, the EU industry has remained stable in terms of economic performance. This is clear evidence of the casual link between the anti-subsidy measures and injury of the EU industry and levels of imports from China. The anti-subsidies (in combination with anti-dumping) measures have successfully prevented Chinese imports from further damaging the EU industry. However, the current Chinese import price and volumes show that Chinese imports will once again cause severe injury to the EU industry if the anti-dumping duties are not extended.

(v) EU Interest

15. The Complainants' believe that it is in the EU's interest to extend anti-subsidy measures on Chinese solar glass imports. Without such protection, the EU industry will suffer injury with the very distinct and real possibility that one or all of the EU producers will have to close down their production activities in the future. It should also be borne in mind that without the EU solar glass production, the EU would lose a significant element of the green energy industry. The EU solar glass industry produces a valued and essential product that is in strong demand inside the EU and in third country markets.

F. INTERESTED PARTIES

18. The Request provides details of known EU solar glass producers, Chinese solar glass producers, and EU end-users who include the following.

(i) Known EU Producers

1	F-Solar
2	Hecker
3	Glasfabrik Lamberts GmbH & Co KG
4	Saint Gobain Glass Deutschland GmbH
5	GMB Glasmanufaktur Brandenburg GmbH
6	Sunarc
7	Pressglass
8	Petra Glass
9	onxysolar
10	Ertex
11	ILVA Glass SpA

(ii) Known Chinese Producers

1	Flat (Solar) Glass Group Co., Ltd
2	Zhejiang Jiafu Glass Co., Ltd
3	Shanghai Flat Glass Co., Ltd
4	Anhui Flat Solar Glass Co., Ltd
5	Xinyi PV Products (Anhui) Holdings Ltd
6	Xinyi Photovoltaic Industry (Anhui) Holdings Co., Ltd
7	Avic Sanxin Solar Glass Co., Ltd
8	Dongguan CSG Solar Glass Co., Ltd
9	Zhejiang HEHE Photovoltaic Glass Technology Co., Ltd
10	Hefei IRICO New Energy Co., Ltd
11	Tangshan jinxin Solar glass co., Ltd
12	China National Building Materials Group Corporation (CNBM)
13	Henan Ancai Hi-Tech Co., Ltd

14	China Glass
15	Jinjin
16	TG Yueda Solar Glass Co., Ltd.
17	TG Fujian Patterned Solar Glass Co., Ltd
18	Novatech Glass Ltd.
19	Tangshan Jinxin Solar Glass Co., Ltd.
20	Wuxi Haida Safety Glass Co., Ltd
21	Fujian Xinfuxing Glass Co., Ltd
22	Henan Yuhua New Materials Co., Ltd
23	Jiaozuo Succeed New Energy Co., Ltd
24	Shan Xi RiShengDa Solar Technology Co., Ltd
25	Changzhou Huamei Photovoltaic Materials Co., Ltd
26	Henan Huamei New Materials Technology Co., Ltd
27	Henan Huamei Cinda Industrial Co., Ltd
28	Shaanxi Topray Solar Co., Ltd
29	Changzhou Almaden PV Glasses Co., Ltd
30	Qingdao Migo Glass Co., Ltd.
31	Hangzhou Dragonsolar Glass Co., Ltd
32	Saint-Gobain Glass
33	AEON Industries Corporation Ltd
34	Luoyang Glass Co., Ltd
35	Nanjing Solglas Science & Technology Co., Ltd
36	Rider Glass Co., Ltd
37	Alliaverre solar glass
38	Qingdao Aoxing Glass Co., Ltd
39	Cangjia New Energy Technology Co., Ltd
40	(Hefei) New Energy Resources Co., Ltd
41	Hangzhou Dongke New Energy Technology Co., Ltd
42	Jiangsu Jinda New Energy Development Co., Ltd
43	Shangdong Jinjing Science & Technology Stock Co., Ltd
44	Qingdao JinJing Co., Ltd
45	Qingdao Joysun New Materials Co., Ltd
46	Link Glass Co., Ltd
47	Moshell Group Co., Ltd
48	Nanjing Zhongyu Solar Glass Technology Co., Ltd
49	Nantong Yida New Energy Group Co., Ltd
50	NBS Glass (Suzhou) Co., Ltd
51	Qingdao Crystal Clear Glass Co., Ltd
52	Qinhuangdo ZiYu Electronic Glass Co., Ltd
53	Qingdao Regenco Industry Co., Ltd
54	Zhejiang Taizhou Taiqi Glass Co., Ltd
55	Qingdao Vatti Glass Co., Ltd
56	Yantai Thriking Glass Co.,Ltd.
57	Chinastar Glass Cp., Ltd.
58	IRICO Group New Energy Company Limited
59	Zhangjiagang Zaofa Safety Glass Co., Ltd
60	Zhejiang Daming Glass Co., Ltd
61	Zhuzhou Liling Kibing Glass Co., Ltd

62	Heyuan Kibing Silicon Industry Co., Ltd
63	Shangdong Wensheng Glass Technology Co., Ltd
64	Jiangsu Xiuqiang Glassworks Co., Ltd
65	Donghai YaLian Glass Co., Ltd

(iii) Known EU Users¹

1	Heckert Solar GmbH
2	SolarWorld Industries GmbH
3	Solarwatt GmbH
4	KIOTO Photovoltaics GmbH
5	aleo solar GmbH
6	Astronergy Solarmodule GmbH
7	CS Wismar GmbH
8	Bosch Solarthermie GmbH
9	Soluxtec GmbH
10	Arcon Sunmark A/S
11	Viessmann Faulquemont S.A.S.
12	Systovi
13	PVP Photovoltaik GmbH
14	Sunerg Solar S.r.l.
15	MG AB Precizika
16	Spessart Solar Fabrik CL GmbH
17	Business Partner s.r.l.
18	Fonroche Industries
19	BRUK-BET Spolka
20	AxSun Solar GmbH & Co. KG
21	Ferrania Solis S.r.l.
22	Energetica Industries GmbH
23	SC Electricom SA
24	Fabrisolia, S.L.U.
25	Solvis d.o.o.
26	Waris S.R.L.
27	RECOM SILLIA SAS
28	SELFA GE S.A.
29	SI Module GmbH
30	SaloSolar Oy
31	Naps Solar Estonia OÜ
32	SCHLAEFER S.R.L.
33	KBB Kollektorbau GmbH

¹ The list of EU independent importers is not provided since, according to the Complainants' best knowledge, the Chinese exporting producers sell its products in the EU directly to end-users.

34	Azimut S.r.l.
35	Manz CIGS Technology GmbH
36	UAB Soli Tek cells
37	BISOL Proizvodnja d.o.o.
38	Ensol Energetyka Solarna Sp.z.o.o.
39	Solarfocus GmbH
40	Citrin Solar GmbH
41	Invent SRL