

## Anti-Dumping Questionnaire (Upstream) Case AD0012: Aluminium Extrusions exported from The People's Republic of China

Period of Investigation (POI):	01/06/2020 – 31/05/2021
Injury period:	10/06/2017 – 31/05/2021
Deadline for response:	31 August 2021
Contact details:	AD0012@traderemedies.gov.uk
Completed on behalf of:	Hydro Aluminium Deeside Ltd

When you have completed this form, indicate the **confidentiality status** of this document by placing an X in the relevant box below:

- Confidential  
 Non-Confidential – will be made publicly available

Your completed response must comprise this questionnaire and the corresponding annex. Please note that you will have to provide a **Confidential** and a **Non-Confidential** version of both the questionnaire and annex, as well as any additional documents you append. All documents should be uploaded to the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)) by **16 August 2021**.

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## Introduction

### About us, this case and this questionnaire

The Trade Remedies Authority (TRA) investigates whether trade remedies are needed to prevent injury to UK industry.

The Trade Remedies Authority (TRA) is responsible for investigating the allegation that aluminium extrusions from The People's Republic of China are being dumped (exported to the United Kingdom, UK, at prices less than their normal value) and that this dumping is causing injury to the UK industry for these goods.

### Why should I take part?

You have received this questionnaire because your company has been identified as an upstream producer for aluminium billets/logs, dies, chemicals related to the production of aluminium extrusions and any other raw materials relevant to the production process of aluminium extrusions. We are asking you to complete it to help us understand the economic impact of imposing, or not imposing, trade remedy measures. The information your company provides will help us to conduct the Economic Interest Test. More details can be found [here](#).

The aim of the Economic Interest Test is to assess if the application of a possible trade remedy measure is in the economic interest of the UK, considering effects on wider industries as well as the directly affected UK industry. When conducting the Economic Interest Test we will consider the:

- Injury caused to UK industry by the imports under investigation and benefits to that industry of removing the injury,
- Economic significance of affected UK industries and consumers,
- Potential effect of a new trade remedy measure on industries and consumers,
- Potential effect on particular geographic areas or groups within the UK,
- Potential consequences for the competitive environment and the structure of UK markets for these goods, and
- Other factors that we consider relevant.

You can find more information about this in our [guidance on the Economic Interest Test](#).

When assessing if a measure is in the economic interest of the UK, we will consider the effect this measure is likely to have on domestic upstream industries. We are interested in any company which:

- Is based in the UK and supplies inputs (goods, equipment or services) used in the production of the goods concerned or
- Is based in the UK and supplies inputs (goods, equipment or service) used in the production of UK-produced like goods.

## How do I respond?

Detailed guidance on how to complete the questionnaire is provided in the [instructions](#) section below.

Please complete as much of this questionnaire as you can by **16 August 2021**. We may contact you again to ask for clarification or supplementary information if necessary. Please provide the source for all information or data you don't own and clearly state any restrictions on sharing it.

## Where can I find more information?

Our [trade remedies guidance](#) provides general information about our investigations and processes we follow.

If you have any specific questions relating to the case, now or while you're completing the questionnaire, please contact the Case Team at [AD0012@traderemedies.gov.uk](mailto:AD0012@traderemedies.gov.uk).

You can also find out more about the regulatory basis of our investigations. The TRA investigates cases under the provisions of [Trade Remedies \(Dumping and Subsidisation\) \(EU Exit\) Regulations 2019 as Amended by the Trade Remedies \(Amendment\) \(EU Exit\) Regulations 2019](#) and under the [Taxation \(Cross-border Trade\) Act 2018](#).

## Instructions on completing this questionnaire

### Preparing your response

This section sets out guidance on how to complete this questionnaire.

If you think you won't be able to complete the questionnaire within the required time, please contact the Case Team ahead of the deadline using the contact details on the cover of this questionnaire. You should outline the length of extension you need and the reasons why. We will notify you of our decision.

If we can accommodate an extension, we will publish a note on our [public file](#) to record both the request and the extension granted.

### How to answer the questions

Please read and follow all the instructions carefully. Your company will need to substantiate all claims with relevant data and information. You may be asked to attach supporting documents in appendices to supplement your responses. To help us verify your information, please retain all these documents, your completed

spreadsheet annex and any calculations you made when developing your responses.

Please also note the following points:

- Do not leave any questions blank. If the question is not relevant to your organisation, please explain why.
- If the answer to a question is “zero”, “no” or “none”, please write this rather than leaving the answer blank.
- Please complete the spreadsheet annexes as requested. Annexes are named to correspond to the relevant sections of this questionnaire and must be completed with reference to the instructions provided. If you feel you cannot present the information as requested, please contact your Case Team as soon as possible.
- Please provide all formulas and calculations used within your questionnaire response.
- If there is insufficient space in any part of the questionnaire to provide the details requested, or we ask for copies of additional information, please submit this information as appendices. Please ensure that any attachments are given a corresponding appendix reference in the title of the document and that these are referenced in the boxes provided.
- Any documents not in English should be accompanied by an English translation.
- Please provide all dates in the format DD/MM/YYYY (e.g. 23/05/2019).
- Unless otherwise stated, ‘year’ or ‘calendar year’ refers to the period 1 January – 31 December and ‘quarter’ refers to the associated three-month periods e.g. 1 January – 31 March, 1 April – 30 June, etc.
- Identify all units of measurement and currencies used in tables, calculations and lists, if not provided by the corresponding instructions, and use units of measurement consistently (e.g. do not use kg and metric tonnes interchangeably).
- For all numerical figures, where appropriate please express every third number with a comma (e.g. ‘1,300’ for one-thousand three hundred, ‘1,300,000’ for one million and three-hundred thousand). Please ensure that all numbers which represent increasing costs and sales are reported as positive figures, and decreasing costs and sales are reported as negative figures.
- Please limit all sales/currency/income figures to two decimal places, apply a full point as a decimal separator and use the appropriate currency symbol or abbreviation (e.g. £1,300.00).
- Provide all costing figures as actual amounts. Where actual amounts cannot be provided and you have reported standard costing instead, please indicate this in the relevant answer, and explain the variance from actual costs, if any.
- All figures should be reported net of recoverable tax unless otherwise stated.

Please refer to the case number, AD0012, in any correspondence with the TRA.

## Preparing confidential and non-confidential copies

You will need to submit one confidential version and one non-confidential version of your questionnaire and the corresponding spreadsheet annexes by the due date. We will publish the non-confidential version on the public file. **Please ensure that each page of information you provide is clearly marked either “Confidential” or “Non-Confidential” in the header.**

Please see our guidance on [how to submit information](#) for further details on what can be considered confidential and how to prepare a non-confidential version of this questionnaire.

In preparing your response, please note the following:

- It is your responsibility to ensure that the non-confidential version does not contain any confidential information.
- Remember to include a statement explaining why information obtained in your response should be treated as confidential e.g. the data is commercially sensitive.
- Provide the source for all information or data you don't own and clearly state any restrictions on sharing it.
- If you do *not* provide a non-confidential summary (or a statement of reasons why you cannot provide this) each time you provide confidential information, the TRA may disregard the information you give us.

All information provided to the TRA in confidence will be treated accordingly and only used for this investigation (except in limited circumstance as permitted by regulation 46 of the *Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019*) and will be stored in protected systems. The non-confidential version of your submission will be placed on the public file, which is available on [www.trade-remedies.service.gov.uk/public/cases](http://www.trade-remedies.service.gov.uk/public/cases).

## Providing information from subsidiaries or associated parties

Our investigation covers all subsidiaries and any other associated companies. If any of your subsidiaries or associated companies also form part of the downstream supply chain of the like goods or goods concerned they should contribute to your responses to this questionnaire. If you have any queries, please contact the Case Team using the details provided on the cover of this questionnaire.

Please note that both natural persons (individuals) and legal persons (e.g. companies) are considered to be associated where they meet the definition of ‘Related Persons’ in [Regulation 128 of the Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#).

If you have any queries about this part of the process, please contact the Case Team.

## What happens next

Once you have completed your questionnaire responses including the corresponding annex(es) and any additional documents requested, you must upload confidential and non-confidential versions through our [Trade Remedies Service](#). Following this:

- you will receive an email confirming the documents have been uploaded successfully;
- the Case Team will contact you if further information is required;
- the non-confidential responses will be placed on the public file; and
- the Case Team may contact you to arrange a visit to verify the information contained in your responses.

## The scope of this investigation

### Goods concerned

Trade remedies are measures designed to address unfair trading practices which mean imports from overseas cause injury to UK industry. Measures generally take the form of a tariff payable on imports.

This investigation covers **aluminium extrusions**, described as:

- Bars, rods, profiles (whether or not hollow), tubes, pipes; unassembled; whether or not prepared for use in structures (e.g. cut to length, drilled, bent, chamfered, threaded); made from aluminium whether or not alloyed, containing not more than 99.3% aluminium. The product concerned is commonly referred to as 'aluminium extrusions', referring to its most common manufacturing process even if it can also be produced by other production processes such as rolling, forging or casting.

Originating in **The People's Republic of China**, destined for consumption in the UK.

These **aluminium extrusions** are currently classifiable within the following commodity code(s): 76041010; 76041090; 76042100; 76042910; 76042990; 76081000; 76082081; 76082089; 76109090. This CN code is only given for information.

In this questionnaire, these goods will be referred to as '**the goods concerned**'. Any reference to 'goods concerned' in this questionnaire refers to the goods description above, regardless of the commodity code under which they are exported.

For the avoidance of doubt, the goods concerned refer to unassembled, aluminium extrusions and therefore aluminium structures or parts of structures, subassemblies, products that are imported in "finished goods kit", and welded tubes and pipes, are not part of this investigation.

### Like goods

In addition to the '**the goods concerned**', we want to know about '**like goods**'. Any reference to '**like goods**' in this questionnaire refers to goods which are like the goods concerned in all respects, or with characteristics closely resembling them, produced by countries other than The People's Republic of China (including the UK) and sold in the UK.



## Upstream products

Upstream products are those inputs (goods, equipment and/or services) used to produce the like goods or goods subject to review.

While upstream products will not be covered by any trade remedy measure that we decide to introduce in this investigation we need information about them to conduct our Economic Interest Test.

We would also appreciate any information you have on your sales to UK producers of the like goods and goods concerned.

**When completing this questionnaire, please provide the data we ask for about any inputs your company supplies used in the production of the like goods or goods concerned. If your company is involved in any other part of the supply chain or production of the goods concerned please contact the Case Team for advice on how to proceed.**

## SECTION A: Company details

### A1 Identity and contact details

1. Please complete the table below, ensuring that the point of contact given has the authority to provide this information:

Legal name of company:	Hydro Aluminium Deeside Ltd
Legal structure (e.g. limited company, sole trader, partnership etc):	Limited Company
Year of establishment:	1984
Other operating names:	-
Name (point of contact):	CONFIDENTIAL
Position:	CONFIDENTIAL
Address:	Bridge Road, Wrexham, LL13 9PS
Telephone No:	01978 660231
Email:	CONFIDENTIAL
Website:	<a href="https://www.hydro.com/en-GB/about-hydro/hydro-worldwide/europe/uk/wrexham/hydro-aluminium-deeside-ltd/">https://www.hydro.com/en-GB/about-hydro/hydro-worldwide/europe/uk/wrexham/hydro-aluminium-deeside-ltd/</a>

2. If you have appointed an external party to act on your behalf in this investigation, please provide their details and attach a letter of authority confirming the TRA should contact them directly:

Name:	-
Address:	-
Telephone No.:	-
Email:	-
Confirm they have signed authority to act (Yes/No):	-
Appendix reference: NA	

### A2 About your company

1. Please list the product you sell which, to your knowledge, is used in the manufacture of the like goods and/or goods concerned.

Extrusion ingot types:

- AA6060
- AA6063
- AA6005
- AA6082
- AA6061

Appendix reference: NA

2. Please describe the role of your company in the UK market or supply chain for the like goods and/or goods concerned (e.g. producer or supplier of a component used in their production).

Hydro Aluminium Deeside Ltd is based at the Wrexham Industrial Estate in North Wales. We produce high quality extrusion ingots (billets), recycling a mix of end of life scrap and process scrap. We can offer a variety of alloys including 6060, 6063, 6005 and 6082, produced in 152, 178, 203 and 228mm diameters for the extrusion industry.

We have been a first-tier supplier to the UK extrusion industry since 1985 and over that time have seen the UK extruders shrink in size, and witnessed many press and site closures.

We are a direct supplier to the aluminium extruders in the UK and are very much reliant on a strong and competitive UK extrusion industry. The UK extrusion market is key to the operations and success of Hydro Aluminium Deeside Ltd.

Appendix reference: NA

3. Please complete **Annex A2.3 UK site information** for your company's 10 largest sites in the UK (by number of employees) that are involved in the supply chain for the like goods and/or goods concerned. For the Period of Investigation (POI, 01/06/2020 – 31/05/2021) and the 12 months preceding it, please provide:

- the site's full address,
- the nature of the site (for example, administration, distribution, or production),
- the number of employees based at the site (as full time equivalent),
- median annual gross wages (if you are unable to provide median annual gross wages please provide mean annual gross wages and note this in the annex).

4. Please list any changes to your sales or distribution affecting the supply chain of the like goods and/or goods concerned since the start of the POI (for example any change in price, who you sell to).

Commercially sensitive.

Appendix reference: NA

1. Please provide your company's annual net profit figures, as a total and as a percentage of total revenue (for the POI and the 12 months preceding it), using **Annex A2.5 Net profit**. Please provide copies of your company accounts covering this period as evidence.

Net profit figures provided in Annex A2.5.  
Signed statutory accounts for 31<sup>st</sup> December 2019 attached (AP1).

Appendix reference: AP1

2. If your company has corporate or structural links or agreements with any other domestic producers, importers, foreign producers, exporters, distributors, suppliers of raw materials used to manufacture the like goods and/or goods concerned, or customers that buy the like goods and/or goods concerned, either in the UK or elsewhere in the world, please use **Annex A2.6 Association** to list their names and addresses and indicate the nature of the association and their role in the supply chain.

## SECTION B: Production, distribution and sales

1. Please use **Annex B1.1 Production** to provide the following information for aluminium billets/logs, dies, chemicals related to the production of aluminium extrusions and any other raw materials relevant to the production process of aluminium extrusions for the POI and the 12 months preceding it:
  - total production volume
  - total production value
  - production capacity
  - capacity utilisation.
2. Please use **Annex B1.2 Customer details** to identify and provide a description of any other companies, in addition to producers of the like goods or goods concerned, that you sell aluminium billets/logs, dies, chemicals related to the production of aluminium extrusions and any other raw materials relevant to the production process of aluminium extrusions to the aluminium extrusions industry. Where possible include details of their country of operation and industry.

Commercially sensitive.

Appendix reference: NA

3. In **Annex B1.3 Sales revenues**, please provide the following information for aluminium billets/logs, dies, chemicals related to the production of aluminium extrusions and any other raw materials relevant to the production process of aluminium extrusions, for the POI and the 12 months preceding it:
  - total sales revenue

- sales revenue for sales to producers of the like goods or goods concerned
4. Please specify which of the UK producers of aluminium extrusions, you have sold aluminium billets/logs, dies, chemicals related to the production of aluminium extrusions and any other raw materials relevant to the production process of aluminium extrusions to the during the POI and the 12 months preceding it, if any: If you have also provided any of the items mentioned above to any producers of aluminium extrusions in the People's Republic of China, please also list them

Commercially sensitive.

Appendix reference: NA

5. Please provide the total sales of aluminium billets/logs, dies, chemicals related to the production of aluminium extrusions and any other raw materials relevant to the production process of aluminium extrusions and the method of price setting: fixed price list, negotiation, etc for each company specified above for the POI and the 12 months preceding it, using **Annex B1.5 Sales to specific companies**. Where possible, please append a proof of sale, such as an invoice, for one transaction with each company you have sold to.

Commercially sensitive.

Appendix reference: NA

## SECTION C: Impact of measure

1. Please describe what impact the implementation of the EU provisional anti-dumping measure [2020/1428](#) imposed in the UK on imports of aluminium extrusions originating in the People's Republic of China from 14 October 2020 to 31 December 2020, had on your business.

Commercially sensitive.

Appendix reference: NA

2. How would implementation or non-implementation of an anti-dumping measure affect your company and industry?

Commercially sensitive.

Appendix reference: NA

3. Would the employment figures provided in question A2.3 be affected if an anti-dumping measure were not imposed? Please provide supporting evidence if possible, as well as estimates (e.g. projections or forecasts) for future years with an explanation of how they have been calculated.

Commercially sensitive.

Appendix reference: NA

4. Would your company's wages be affected if an anti-dumping measure were not imposed? Please provide supporting evidence if possible, as well as estimates (e.g. projections or forecasts) for future years with an explanation of how they have been calculated.

Commercially sensitive.

Appendix reference: NA

5. Please explain any effects on your plans for future UK investment or expansion if an anti-dumping measure were not imposed? Please state how this would affect different sites/locations of your company and support your claims with evidence.

Commercially sensitive.

Appendix reference: NA

6. Please describe how you would expect the implementation and non-implementation of an anti-dumping measure to affect:

- market price of the like goods in the UK;
- total UK output of the like goods;
- total imports of the goods concerned to the UK; and
- total exports of the like goods from the UK.

Where possible, please support your answer with any evidence or estimates of impacts.

We do not expect the price for the end product (aluminium extrusions) to be affected by the implementation of a tariff.

We have no information to provide on the other areas.

Appendix reference: NA

7. How might the imposition of a trade remedy measure affect:

- the number and range of suppliers of like goods and/or goods concerned,
- the ability of suppliers of like goods and/or goods concerned to compete,
- the incentives for suppliers of like goods and/or goods concerned to compete vigorously,
- the choices and information available to UK consumers?

Please provide any evidence you have that can support your answer as an appendix.

Commercially sensitive.

Appendix reference: NA

8. Please describe the nature and degree of any impacts on particular geographic areas or groups that you would expect if a trade remedy measure is imposed.

None.

Appendix reference: NA

9. As a public body, the TRA has an obligation under the *Equality Act 2010* to ensure that the possible effects of its activities on different people are considered. This public sector Equality Duty covers the following protected characteristics:

- age,
- disability,
- gender reassignment,

- marriage or civil partnership,
- pregnancy and maternity,
- race,
- religion or belief,
- sex, and
- sexual orientation

Please provide any relevant information about whether the imposition of an anti-dumping measure might disproportionately affect any of these groups. Please enter your response in the box below.

None.
Appendix reference: NA

10. If there are any additional economic factors that you think may be relevant for the Economic Interest Test in this investigation, please provide details here and any supporting evidence you have.

None.
Appendix reference: NA



## SECTION D: Next steps and declaration

### Next steps

Once you have completed all parts of the questionnaire, the declaration below should be signed by an authorised official of your company. Please submit this questionnaire and any other additional submissions you consider relevant for this transition review through the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)) by **16 August 2021**.

Please submit both a confidential and non-confidential version of the questionnaire. Further information on what can be considered confidential and how to prepare a non-confidential version of this questionnaire can be found in our guidance on [how we handle confidential information](#).

### Declaration

By signing this declaration, you agree that all information supplied in this questionnaire is complete and correct to the best of your knowledge and belief and understand that the information submitted may be subject to verification by the TRA.

Company name:

31 Aug 2021

CONFIDENTIAL

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Date

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Signature of authorised official

CONFIDENTIAL

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Name and title of authorised official