



Register as a contributor to the case

Anti-dumping investigation Case AD0012: Aluminium Extrusions exported from the People's Republic of China

Period of Investigation:	<input type="text" value="01/06/2020 – 31/05/2021"/>
Injury Period:	<input type="text" value="01/06/2017 – 31/05/2021"/>
Deadline for response:	<input type="text" value="06 July 2021"/>
Case Team Contact:	<input type="text" value="AD0012@traderemedies.gov.uk"/>
Completed on behalf of:	<input type="text" value="3o Limited"/>

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

- Confidential
 Non-Confidential – will be made publicly available

Please note that you will have to provide **two copies of your response** – a **Confidential** and a **Non-Confidential version**. Both copies should be returned to the TRA using the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **06 July 2021**.



Table of Contents

Table of Contents	2
The scope of this investigation	3
Instructions	4
I – Why you are being asked to complete this form	4
II – Who should complete this form	4
III – Deadline for response	4
IV – Note about confidentiality.....	5
Section A – Your organisation and your interest in the case	6
A1 Identity and contact details	6
A2 Your organisation’s interest in the case	6
Section B – Additional information	9
Section C – Certification	13



The scope of this investigation

Goods Concerned

This investigation covers Aluminium Extrusions exported from People's Republic of China (PRC), described as:

The goods under investigation are 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.

These Aluminium Extrusions are currently classifiable within the following commodity code(s): **76041010, 76041090, 76042100, 76042910, 76042990, 76081000, 76082081, 76082089 and 76109090.**

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

Like goods

Any reference to '**like goods**' in this form refers to goods produced in the UK or imported to the UK from a country other than the People's Republic of China which are like the goods concerned in all respects, or with characteristics closely resembling them.



Instructions

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

I – Why you are being asked to complete this form

We are seeking your cooperation as an interested party or a contributor, who wishes to participate in this investigation by providing information to help TRA conduct this investigation. The information your organisation provides will help us determine a fair and appropriate response which is in the UK's overall interest. This form allows us to collect basic information and data about your organisation and your interest in this case.

An interested party or a contributor, who could use this form to register their interest in this investigation include, for example:

- a foreign government;
- a trade or business association representing a UK producer of the like goods, or an exporter or an importer of the goods concerned;
- an upstream supplier to a UK producer of the like goods, or an exporter or an importer of the goods concerned;
- a downstream buyer of the goods concerned and/or like goods;
- a natural person or a legal person.

For more information about this case, you may refer to the Notice of Initiation published at: www.trade-remedies.service.gov.uk/public/cases.

II – Who should complete this form

You should complete this form if you are an interested party or a contributor, who wishes to participate in the Aluminium Extrusions investigation.

If you are producer, importer or exporter of the goods concerned or like goods, please complete the relevant Pre-Sampling Questionnaire.

III – Deadline for response

A completed form must be submitted to the TRA by no later than **06 July 2021**. If you are unable to provide a completed submission by the given due date and you wish to request an extension, please contact the Case Team at:

AD0012@traderemedies.gov.uk.



IV – Note about confidentiality

You will need to submit one confidential version and one non-confidential version of this document. Please ensure that each page of information you provide is clearly marked either “Confidential” or “Non-Confidential” in the header. It is your responsibility to ensure that the non-confidential version does not contain any confidential information.

Please see <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#how-we-handle-confidential-information> for further information on what can be considered confidential and how to prepare a non-confidential version of this document.

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.



Section A – Your organisation and your interest in the case

A1 Identity and contact details

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

Legal name of company:	3o Limited
Legal structure (e.g. limited company, sole trader, partnership etc):	Limited Company
Year of establishment:	2003
Other operating names:	N/A
Name (point of contact):	
Position:	Managing Director
Address:	
Telephone No:	
Email:	
Website:	www.3olimited.com

A2 Your organisation's interest in the case

To register your organisation's interest in this case, please complete the text boxes below. You should use this form if you are not a producer, importer or exporter of the goods concerned or like goods. For a definition of goods concerned/like goods, please refer to the Notice of Initiation.



Please describe the role of your organisation with regards to the goods concerned or the like goods:

Please answer here

3o Limited are an end to end supply chain management company, who import and deliver to customers products that include those concerned in this investigation. We buy products on behalf of our customers; where we manage and oversee contracting with suppliers, quality assurance, quality control, scheduling orders and their shipment, clearance and delivery to them.

Please describe your interest in this case:

Please answer here

3o Limited specifically import a range of building cladding and decking products on behalf of our customer that are within HS Code 7610 90 90 notarised in this investigation.

In the context of the UK Government's regulations and guidelines associated with the COVID-19 pandemic, please state if this has had any impact on your organisation's normal business activity during the Period of Investigation (01/06/2020 – 31/05/2021). If applicable, please provide evidence.



Please answer here

During the COVID-19 pandemic we have been unable to engage in our normal practice of benchmarking suppliers from whom we buy materials. It is highly important for us to be able to undertake detailed quantitative appraisals of our suppliers' capabilities that includes manufacturing site visits which we have been unable to undertake. Furthermore, should there be a need to consider changing our current sources of supply from China, the respective necessary travel, both national and international, would not currently be feasible nor possible.



Section B – Additional information

Use the box at the end of this section to provide any other relevant information which you think would be useful to help our investigation.

This may include:



- other parties you believe should receive a questionnaire;
- any initial views you have about the possible existence of a particular market situation in the domestic market of the exporting country or territory such as:
 - situations/distortions in the domestic market of the exporting country where prices are artificially low;
 - significant barter trade;
 - prices reflect non-commercial factors; or
 - any other reasonwhich means it is not appropriate to use the comparable price to determine the normal value of the goods concerned;
- the scope of the investigation; or
- anything else you consider relevant.



Please answer here

Collecting data to support this investigation is likely to prove difficult unless all importers are engaged to provide full information on their imports. This is for the simple reasons that there is no public record of the net net weight of aluminium being imported and BoL weights will include packaging and steel 'dolly' weights. These packaging and dolly weights significantly increase the weight of the notarised import whilst not increasing the value. The effect of this is to create a wrong impression that the imported cost per tonne of aluminium is lower than they actually are. These packaging materials and containerisation aids can add over 10% of gross weight notarised on BoLs. Moreover, import statistics fail to accumulate all respective costs associated with clearances and intermodal delivery of goods to end customers and therefore present an undervalued cost associated with a like for like comparison between import and local supply.

For some years our British customers have found themselves competing in their home market against international competition; whilst they have invested in designing advantages into their products, which are protected by IPR, competitive cost of supply remains a fundamental prerequisite for survival and success in their market places. Our customers have invested significantly in their supply chains in the purchase of capital tooling alongside huge investments in certification and accreditation testing. These investment costs are not thereafter reflected in the import value of goods imported thereafter. The most competitive of their competitors are not based in UK and neither are they necessarily based in China. Should additional duties be levied onto the goods we import for our customers they will almost certainly withdraw from these markets completely as they will be unable to afford refinancing the capital investments to begin trading with another supplier whether in the UK or not. Moreover, the value of their much higher sales of finished goods would prospectively be lost to non-UK end product competitors and there-in seeing a substantial loss to the UK exchequer from our British manufacturing customers. Furthermore, export sales that are currently and expected to be achieved from the current supply chain would also likely be lost as there would be insufficient economy of scale to afford supporting an export catalogue.

Should it be found appropriate to levy additional duties onto Chinese manufactured Aluminium Extrusion, there is one certainty. This is that the affected aluminium extrusion would not thereafter be bought from any of the four notarised complainants in the investigation petition, they would be bought from other sources off-shore and outside of the UK. This is for a couple of different reasons; the UK suppliers are unable to fulfil the technical requirements of all items currently bought, they are currently advertising lead times for new orders in the order of 12 weeks which is too slow and offers no 'total acquisition cost' advantage over lower cost material that would be bought on same or less lead time from other global sources and lastly the cost of supply from the UK manufacturers does not enable competitive supply for our customers to compete in their markets.



Overall this produces a situation whereby the British aluminium extruders notarised as complainants would not benefit from any effect a successful petition would generate and there would only be losers who are the current British companies who have invested in supply chains from China. There-in it is completely counterintuitive to find public interest, economic interest or indeed user interest from any investigation in this matter.

In addition, if your organisation buys the goods concerned and/or like goods, please provide the following information for the POI (01/06/2020 – 31/05/2021):

Number of UK sites using the goods concerned and/or like goods	2
Number of employees at UK sites using the goods concerned and/or like goods	90
Total production which uses the goods concerned and/or like goods during POI (volume, in metric tonnes)	
Total production which uses the goods concerned and/or like goods during POI (value, in £)	
Name of supplier(s) of the goods concerned and/or like goods	



Section C – Certification

The undersigned certifies that the information supplied herein is correct and complete to the best of his/her knowledge and belief.

The undersigned certifies that he/she has the authority to supply the information contained herein on behalf of his/her organisation.

Signature (including e-signature):

x

*(**Please do not fill in the 'Name' or 'Position at Company' sections on your company's **non-confidential version** of this questionnaire**)*

Name: Click or tap here to enter text.

Position at organisation:

Date: 06 July 2021