



Pre-Sampling Questionnaire (Importer)

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="Righton & Blackburns 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

The scope of this investigation.....	3
Instructions.....	4
I - Why you are being asked to complete this pre-sampling questionnaire	4
II – Who should complete this form	4
III – Deadline for response	4
IV – Note about confidentiality	4
V – Period of Investigation	5
VI – Injury Period.....	5
Section A – Activities of your company and any associated parties.....	6
A1 – Identity and contact details	6
A2 – Your company’s activities	7
A3 – Associated parties and operational links.....	9
Section B – Details of companies you import from.....	10
Section C – Sales, imports and domestic purchases	11
C1 – Total company revenue	11
C2 – Your imports of the goods concerned.....	11
C3 – Imports of the like goods	12
C4 – Like goods purchased from UK producers	13
Section D – Additional information	14
Section E – Economic Interest Test	15
E1 – Upstream Industry (in the UK)	15
E2 – Downstream Industry (in the UK).....	15
Section F – Certification	16



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

Like goods

This pre-sampling questionnaire also asks for information about your company's imports and sales of goods which are **like** the goods concerned. Any reference to '**like goods**' in this pre-sampling questionnaire 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 pre-sampling questionnaire

We are seeking your cooperation as a UK importer to identify whether the alleged dumping has occurred and has caused injury to the UK industry. The information your company provides will help us determine a fair and appropriate response.

This pre-sampling questionnaire allows us to collect basic information and data about your company. If a large number of UK importers complete this pre-sampling questionnaire, we will use the information each one provides to help us decide which companies we want to sample for further investigation. If you are sampled, we will send you a more detailed questionnaire to complete.

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 a UK importer of Aluminium Extrusions imported from the People's Republic of China ('the goods concerned').

If you are not a UK importer, please complete either the relevant Pre-Sampling Questionnaire or the Contributor Registration Form.

III – Deadline for response

A completed pre-sampling questionnaire must be submitted to the TRA by no later than **Tuesday 6th 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 via AD0012@traderemedies.gov.uk.

IV – Note about confidentiality

You will need to submit one confidential version and one non-confidential version of your pre-sampling questionnaire by the due date. 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 questionnaire.

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.

V – Period of Investigation

The Period of Investigation (POI) referred to in this pre-sampling questionnaire is: **01/06/2020 to 31/05/2021**.

VI – Injury Period

The Injury Period referred to in this pre-sampling questionnaire is: **01/06/2017 to 31/05/2021**.

Please follow the instructions for each question to provide the appropriate information regarding the goods concerned or like goods.



Section A – Activities of your company and any associated parties

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:	Righton & Blackburns Limited
Legal structure (e.g. limited company, sole trader, partnership etc):	Limited company
Year of establishment:	1916
Other operating names:	
Name (point of contact):	
Position:	
Address:	Parkway House Unit 6, Parkway Industrial Estate, Pacific Avenue, Wednesbury, West Midlands, England, WS10 7WP
Telephone No:	
Email:	
Website:	https://www.rightonblackburns.co.uk/



A2 – Your company’s activities

To determine your company’s role for the purpose of this investigation, please select the activity/activities of your company below. For a definition of goods concerned/like goods please refer to the section above on ‘the scope of this investigation’.

importer of the goods concerned in the UK

other (please give details below)

If you have selected ‘other’, please describe the role of your company with regards to the goods concerned or like goods:

Righton Blackburns stock hold and distribute non-ferrous metals including imported Aluminium long product.

Righton Blackburns sell the concerned goods, however these Chinese goods are purchased through UK registered companies (via Press Metals, ‘PMI’) and therefore we are not the importer.

We import like goods from various countries of origin globally as well as utilising producers in the UK.

We and our UK manufacturing customers rely heavily on material produced in China, there is insufficient production capability in the UK to meet the domestic demand.

Please describe your interest in this case:



Please state whether you sell your imports of the goods concerned or whether you use the goods concerned in a manufacturing process. If you do both, please state what proportion of the good concerned is sold, and what proportion you use.

Whilst we sell the concerned goods we purchase them through UK registered companies who are the importers / consignees. We do not use the goods concerned in any manufacturing process before selling them to customers.

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 company's normal business activity during the POI. If applicable, please provide evidence.



A3 – Associated parties and operational links

Please give details of all associated parties involved in the production and/or sales (export and/or domestic) of the goods concerned or like goods during the POI. 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](#).

Examples of activities could include manufacturing, exporting, purchasing, warehousing, sales (domestic), sales (export), further processing of the goods concerned or like goods.

	Company name	Company location (city, country)	Activities	Relationship
Your company	Righton & Blackburns Limited	10 Locations throughout UK	Stockholder	
Associated Party 1	Amari Metals Limited	Wednesbury, UK	Metal Distribution	UK Parent Company

+ Add additional rows as required



Section B – Details of companies you import from

Please provide the contact details for each individual company you import from.

Exporter/Supplier name	Address	Contact Details

+ Add additional rows as required



Section C – Sales, imports and domestic purchases

C1 – Total company revenue

Please provide your company’s total revenue and the revenue of the goods concerned:

	Value in GBP (£)
Total revenue of your company in the POI	
Total revenue of your company for the goods concerned in the POI	

C2 – Your imports of the goods concerned

Please provide the total volume and value of the goods concerned **imported** by your company from the People’s Republic of China, in the POI:

	Volume (Metric Tonnes)	Value in GBP (£)
The goods concerned imported into the UK in the POI <i>(Sum of next three rows should match volume/value of this row)</i>		
The goods concerned imported into the UK in the POI and resold in the UK		
The goods concerned imported into the UK in the POI and consumed by your own company		
The goods concerned imported into the UK in the POI and exported		



Please provide a breakdown of which **types of aluminium extrusion** your company imported from PRC during the POI, including the volume produced for each.

Type of Aluminium Extrusion	Value in GBP (£)	Volume (Metric Tonnes)
Bars and Rods		
Tubes and Pipes – not welded		
Hollow Profiles		
Solid Profiles		
Other		

C3 – Imports of the like goods

Please provide the total volume and value of the like goods **imported** by your company from **all other countries** in the POI:

	Volume (Metric Tonnes)	Value in GBP (£)
Like goods imported into the UK in the POI <i>(Sum of next three rows should match volume/value of this row)</i>		
Like goods imported into the UK in the POI and resold in the UK		
Like goods imported into the UK in the POI and consumed by your own company		
Like goods imported into the UK in the POI and exported		



C4 – Like goods purchased from UK producers

If you have also **purchased like goods** from **UK producers** during the POI, please provide the total sales volume and total sales price value of your purchases in the table below.

	Volume (Metric Tonnes)	Value in GBP (£)
Like goods purchased from UK producers in the POI <i>(Sum of next three rows should match volume/value of this row)</i>		
Like goods purchased from UK producers in the POI and resold in the UK market		
Like goods purchased from UK producers in the POI and consumed by your own company		
Like goods purchased from UK producers in the POI and exported		



Section D – Additional information

Please provide any other relevant information which you think would be useful to help our investigation in the box below.

This may include:

- other interested parties you believe should receive a questionnaire;

Righton & Blackburns is a large Independent UK Stockholder and Distributor of aluminium semi-finished products to UK Manufacturing businesses.

Our interests encompass the supply chain from UK, European and RoW country producers.

Our UK customers (who cover the entire spectrum from Sole-Trader businesses to Global Multi-Nationals) demand high quality, competitively priced and timely deliveries of raw materials that enable them to manufacture products competitively in domestic and export markets.

UK production estimates vary, but are in the range of 90,000 to 100,000 Tonnes produced out of a total capacity of 100,000 to 110,000 Tonnes.

Combined with HMRC UK Trade Statistics Import Export Data 2020, this would indicate UK market consumption in 2020 was 236,000 Tonnes across three core Aluminium Extrusion Commodity Codes 76 04, 76 08 and 76 10.

Consequently for these three Commodity Codes alone, there is already an enormous shortfall in available UK capacity and production.

We currently import from a wide range of countries including several EU27 countries, Turkey, USA and China. Whilst price differentials occur, these are mostly influenced by Foreign Exchange fluctuations, Metal Premiums and transportation costs, certainly not discounted or dumped material costs.

Today, our purchases from China are landing at higher prices than we can source from UK and Europe, and this is without any anti-dumping measures in place.

Should Chinese (or any other country's) material be excluded from the market by anti-dumping duties, this will put additional strain on the existing European supply base that is already pushing lead times out and raising prices on a weekly basis.

Removing an important trading partner would further unbalance a market that is already suffering from capacity problems both within the UK and in the EU27.

We believe application of punitive anti-dumping duties will endanger the backbone of 'UK Manufacturing plc' – our customer's will be at risk of being starved of essential raw materials and their competitiveness will be handicapped in the fiercely competitive global market.



- any initial concerns you have about the possible existence of a particular market situation in the domestic market of the People's Republic of China (the exporting country) such as:
 - situations/distortions in the domestic market of the PRC 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;
- any initial concerns you have about the scope of the investigation;
- anything else you consider relevant.



Section E – Economic Interest Test

In addition, as part of this investigation, we will conduct an Economic Interest Test to assess whether a measure is in the economic interest of the UK. As part of this process, we would like your help to identify upstream and downstream industries which may wish to contribute to our investigation. If possible, please provide the names and contact information for any UK-based companies operating upstream or downstream of your business in the supply chain for the like goods.

E1 – Upstream Industry (in the UK)

Company Name	Nature of Business	Contact Information

+ Add additional rows as required

E2 – Downstream Industry (in the UK)

Company Name	Nature of Business	Contact Information

+ Add additional rows as required




Section F – Certification

By providing the information above, you acknowledge that your company may be asked to complete a detailed questionnaire and the TRA may ask to visit your premises in order to verify the questionnaire response.

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

The undersigned certifies that they have the authority to supply the information contained herein on behalf of **Righton & Blackburns Limited**.

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:

Position at company:

Date: 6th July 2021