



## Pre-Sampling Questionnaire (Exporter)

### Anti-dumping investigation

## Case AD0012: Aluminium Extrusions exported from the People's Republic of China

Period of Investigation:	01/06/2020 – 31/05/2021
Injury Period:	01/06/2017 – 31/05/2021
Deadline for response:	06 July 2021
Case Team Contact:	AD0012@traderemedies.gov.uk
Completed on behalf of:	<b>JMA (HK) Company Limited</b>

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](http://www.trade-remedies.service.gov.uk)) by 06 July 2021.



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## 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

In addition to seeking information about your company's export sales to the UK of the goods concerned, this pre-sampling questionnaire will also ask about your sales of like goods in your domestic market and to third countries. 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.

### 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 an **overseas exporter** 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 overseas exporters of the goods concerned from the People's Republic of China 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 in relation to this case, you may refer to the Notice of Initiation published at: [www.trade-remedies.service.gov.uk/public/cases](http://www.trade-remedies.service.gov.uk/public/cases).

If you are sampled for further investigation, we will provide you with a further detailed questionnaire. By submitting a completed detailed questionnaire response, you might become eligible for an individual anti-dumping amount, if we are recommending that measures apply following this investigation. Please refer to [Section C](#) for more information on individual anti-dumping amounts.

If you do not complete this pre-sampling questionnaire or the detailed questionnaire, you could be found to be non-cooperating. For more details on how this may affect you, please consult our [operational guidance on non-cooperation](#).

## II – Who should complete this form

You should complete this form if you are an **overseas exporter** of Aluminium Extrusions exported from the People's Republic of China ('the goods concerned').

If you are not an **overseas exporter**, 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 **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 [AD0012@traderemedies.gov.uk](mailto: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](http://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:	<b>JMA (HK) Company Limited</b>
Legal structure (e.g. limited company, sole trader, partnership etc):	<b>Limited liability company</b>
Year of establishment:	<b>Established in Year 2001</b>
Other operating names:	<b>None</b>
Name (point of contact):	<b>Xie Yongbo</b>
Position:	<b>Manger of legal department</b>
Address:	<b>Room 301 C 3/F Lai Cheong Factory Building 479-479a Castle Peak Road Lai Chi Kok, Hong Kong</b>
Telephone No:	<b>+86-757-85578762</b>
Email:	<b>jmxyb@jma.cn</b>
Website:	<b>www.jma.cn</b>



## 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 above section 'the scope of this investigation'.

**overseas exporter of the goods concerned**

other (please give details below)

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

*Please answer here*

Please describe your interest in this case:

**Answer:**

**JMA (HK) Company Limited (“JMA (HK)”) is a Hong Kong incorporated private company with limited liability and is engaged in providing agency services, trading and manufacturing of aluminium products. During the Period of Investigation (“POI”), JMA (HK) entrusted its affiliated company Guangdong JMA Aluminium Profile Factory (Group) Co., Ltd. (“Guangdong JMA”) to process the goods concerned under processing trade method and then exported the goods concerned to the UK. Moreover, JMA (HK) also exported the goods concerned on behalf of Foshan JMA Aluminium Co., Ltd (“Foshan JMA”) to the UK. Guangdong JMA and Foshan JMA are also submitting PSQ response to the TRA separately.**



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 **in the UK** during the POI. If applicable, please provide evidence.

**Answer:**

**There is no impact on JMA (HK)’s normal business activity in the UK during the POI.**

**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.

	<b>Company name</b>	<b>Company location (city, country)</b>	<b>Activities</b>	<b>Relationship</b>
Your company	JMA (HK) Company Limited	Hong Kong	Trading company for sales of goods concerned manufactured under general trade and processing trade; exported to UK	
Associated Party 1	Foshan JMA Aluminium Co., Ltd	Foshan City, Guangdong Province, China	Manufacturing of goods concerned and export sales to the UK	Parent company





Associated Party 2	<b>Guangdong JMA Aluminium Profile Factory (Group) Co., Ltd.</b>	<b>Foshan City, Guangdong Province, China</b>	<b>Manufacturing of goods concerned and export sales to the UK</b>	<b>Controlled by same individuals</b>
Associated Party 3	[confidential]	Hong Kong	[Non-confidential summary: activities of associated party]	Controlled by same individuals

+ Add additional rows as required



## Section B – Production and sales volumes

### B1 – Production

Please fill in your company’s total production volume and capacity for the goods concerned and the like goods for the POI, in the table below.

	Volume (Metric Tonnes)
Overall production of the goods concerned and the like goods during the POI	<u>[Non-confidential range: 14,000 – 16,000]</u>
Total production capacity of the goods concerned and the like goods during the POI	<u>Not applicable</u>

#### Answer:

**JMA (HK) did not manufacture the goods concerned directly. During the POI, JMA (HK) entrusted its affiliated company Guangdong JMA to process the goods concerned under processing trade method and then exported the goods concerned to the UK. Therefore, JMA (HK) is not able to report the production capacity.**

### B2 – Sales volume and value

Please provide the total sales volumes and sales price values in the table below.

	Volume (Metric Tonnes)	CIF Value in USD
Total export sales of the goods concerned to the UK in the POI, <b>manufactured</b> by your company	<u>[Non-confidential range: 35 – 43]</u>	<u>[Non-confidential range: 130,000 – 160,000]</u>
Total export sales of the goods concerned to the UK in the POI, <b>not manufactured</b> by your company (e.g. <i>purchased by your company and re-sold via export</i> )	<u>[Non-confidential range: 44 – 55]</u>	<u>[Non-confidential range: 140,000 – 180,000]</u>
Total domestic sales of like goods in the POI <b>manufactured</b> by your company	<u>0</u>	<u>0</u>



Total domestic sales of like goods in the POI <b>not manufactured</b> by your company (e.g. purchased by your company and re-sold domestically)	<u>0</u>	<u>0</u>
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**Answer:**

During the POI, JMA (HK) entrusted its affiliated company Guangdong JMA to process the goods concerned under processing trade method and then exported the goods concerned to the UK. For these export sales under processing trade method, JMA (HK) deems them as manufacturing by itself and then reports the data at the first line of above table.

Moreover, JMA (HK) also exported the goods concerned on behalf of Foshan JMA to the UK (general trade). For these export sales under general trade, JMA (HK) reports the data at the second line of above table.

In addition, as a Hong Kong company, JMA (HK) does not use CNY as booking currency and thus is not able to report the sales value in CNY, as an alternative, JMA (HK) report the sales value in USD in above table.

Please provide a breakdown of the **commodity codes** your company exported to the UK during the POI, including the CIF sales value and sales volume for each.

Commodity Code	CIF Value in GBP (£)	Volume Exported (Metric Tonnes)
Bars and Rods	<u>0</u>	<u>0</u>
Tubes and Pipes – not welded	<u>0</u>	<u>0</u>
Hollow Profiles	<b><u>[Non-confidential range: 120,000 – 160,000]</u></b>	<b><u>[Non-confidential range: 48 – 60]</u></b>
Solid Profiles	<b><u>[Non-confidential range: 75,000 – 98,000]</u></b>	<b><u>[Non-confidential range: 30 – 38]</u></b>
Other	<b><u>[Non-confidential range: 1,400 – 1,700]</u></b>	<b><u>[Non-confidential range: 0.25 – 0.30]</u></b>

Please provide information on the **UK-based companies** that your company exported to during the POI, including the CIF sales value and sales volume, as well as your company's relationship to them (e.g. associated or non-associated).

Name of UK Company	Relationship	CIF Value in GBP (£)	Volume Exported (Metric Tonnes)
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[confidential]	non-associated	<u>[Non-confidential range: 130,000 – 170,000]</u>	<u>[Non-confidential range: 50 – 65]</u>
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+ Add additional rows as required



## Section C – Individual Anti-Dumping Amount

If the TRA decides to sample overseas exporters, and you are **not** selected for this sample, please indicate whether you would like to complete the detailed questionnaire.

By submitting a completed detailed questionnaire response, you might become eligible for an individual anti-dumping amount if we recommend applying measures following this investigation.

- Yes  
 - No

If you are **not** selected for this sample and you then do **not** choose to complete a detailed questionnaire, you will not be eligible for an individual anti-dumping amount. Your anti-dumping amount will be determined based on the amounts imposed on the overseas exporters in the sample.

### Please note:

If we recommend that a trade remedy measure is applied following this investigation, and you have requested an individual anti-dumping amount, please note that you will be required to supply the necessary information within the given timeframe for us to calculate this for you.

The TRA must accept an overseas exporter's request for an individual anti-dumping amount, and calculate an individual amount, providing that:

- the information required is complete and submitted on time; and
- the number of requests for individual calculations does not unduly burden the investigation and risk delaying its conclusion.



## 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;
- 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 reason

which 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.

**Answer:**

**JMA (HK) submits that there is no existence of a particular market situation in the domestic market of the People’s Republic of China. In addition, the scope of the investigation is too wide. For example, it is not clear that whether or not the products in a packaged kit (“finished goods kit”) are included in the scope of investigation.**



## 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
Unknown		

+ Add additional rows as required

### E2 – Downstream Industry (in the UK)

Company Name	Nature of Business	Contact Information
Unknown		

+ 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 **JMA (HK) COMPANY LIMITED.**

Signature (including e-signature):

*For and on behalf of*  
JMA (HK) COMPANY LIMITED  
堅美(香港)有限公司

x Cao Ruibin

*Authorised Signatory*

Date: 02 July 2021