



Anti-Dumping Questionnaire Unrelated Importer Case AD0012: Aluminium extrusions imported from the People's Republic of China

Period of Investigation (POI):	1 June 2020 – 31 May 2021
Injury period:	1 June 2017 – 31 May 2021
Deadline for response:	18 August 2021
Contact details:	AD0012@traderemedies.gov.uk
Completed on behalf of:	3o Limited

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) by 18 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 TRA has been established to provide the UK with its own independent trade remedies system.

This case is 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?

We are asking UK importers to complete this questionnaire to help us understand the industry and market for this product and assess if a measure is needed. We need to establish whether the alleged dumping has occurred and has caused injury to the UK industry.

The information your company provides will help us to reach a fair and proportionate decision.

How do I respond?

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

Please provide all the information requested by **18 August 2021**. We may need to issue a deficiency notice if we determine that the information supplied in the questionnaire is incomplete or inadequate. We may also send a notice requesting clarification or supplementary information if necessary. Therefore, please provide as much detail as possible in your responses.

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.



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.
- 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 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. This is so that we can publish the non-confidential version of your information on our public file, as part of our **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 including contact details for you, your company and any other persons or companies that you work with.



- 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.

Providing information from subsidiaries or associated parties

Section A of this questionnaire includes detailed questions about your company structure. Although this questionnaire is intended for your company, our investigation covers all subsidiaries and any other associated companies involved in the import, production, sale, R&D, distribution and/or supply of the like good and/or goods concerned.

Please note, 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 any of your subsidiaries or associated companies are also a UK importer of the goods concerned or the like goods, they should **also** complete this questionnaire. Please make sure you provide your subsidiaries with access to it.
- If your subsidiaries or associated companies are not UK importers but are involved in the downstream sales of the goods concerned or the like goods, your questionnaire response should include information from those companies.

If you have any queries about this part of the process, please contact the Case Team using the details provided on the cover of this questionnaire.



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.

Verifying the information you supply

The TRA will verify, as far as possible, the information provided to it. As part of this process, we may conduct verification visits. If we need to verify information that you provide by visiting your premises, the Case Team will contact you to arrange this.

Visits can last several days, during which we will want to speak to management and staff to help establish the completeness, relevance and accuracy of the information provided.

Please keep a record of formulas and steps used in your calculations and other related material/documentation as it may be asked for during verification. In some circumstances, verification may be conducted remotely.

Once verification is complete, the TRA will prepare a report and share a draft with you. We will then ask you to prepare a non-confidential copy of the report for the public record. If you feel some information in the report should be kept confidential, please provide your reasons for this.



The scope of this investigation

Goods concerned

This investigation covers **aluminium extrusions** exported from **the People's Republic of China**, 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.

These aluminium extrusions are currently classifiable within the following CN code(s) 76041010; 76041090; 76042100; 76042910; 76042990; 76081000; 76082081; 76082089; 76109090. These codes are only given for information and not all goods within these codes are part of this investigation.

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 seeking information about your company's imports of the goods concerned, this questionnaire will also ask about your sales of like goods in the UK market. 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, either produced in the UK or imported from countries other than the People's Republic of China.

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

Product Control Numbers

The TRA uses Product Control Numbers (PCNs) to define and distinguish the different types of products that fall under the goods description above.

PCNs, which come in the form of an **alphanumeric code**, help to create a categorisation system so that comparisons can be made between goods produced in the domestic UK market and those produced in foreign markets.

In this questionnaire and the corresponding annexes you will be asked to construct PCNs representing the different types of products you import. When stating your PCNs, please do not use any spaces, dashes or other means of separation, and ensure you follow the order of characteristics outlined in the table below. Please use this PCN structure consistently throughout your questionnaire response, including the corresponding spreadsheet annex.

Field Description	Field Format	Explanation
Customisation	X Letter	S – standard profiles/shapes which can be purchased by any customer, normally shown in a standard catalogue C – custom/bespoke profiles. The customer owns the copyright/design rights
Shape/Form	X Letter	B- Bars and rods P- Pipes and tubes S– Solid profiles specifically: I, C, T (both with equal and unequal sides), H, U, double U, Z, L (angle), mouldings/ledgers H- Hollow Shape O – Other
Alloy Series	X Digit	2 - 2000 series 3 - 3000 series 4 - 4000 series 5 – 5000 series 6 – 6000 series 7 – 7000 series 8 – 8000 series 9 - Other
Length	X Letter	S – shorter than or equal to 2 metres M – longer than 2 metres and up to 7 metres L – longer than 7 metres



Weight per metre	X Digit	0- <0.1 kg/m 1- 0.1 kg/m to <0.5 kg/m 2- 0.5 kg/m to < 4.5kg/m 3- 4.5kg/m to < 8 kg/m 4- 8kg/m to < 10 kg/m 5- 10kg/m +
Maximum Cross-Sectional Dimension	X Letter	S – less than or equal to 310mm L – greater than 310 mm
Finish	X Letter	N- No Finish P- Painted A-Anodised O- Other
Fabrications	X Letter	N- None Y- Other incl additional cutting, machining, drilling, punching, notching, bending, stretching,
Drawing	X Letter	Only applies to Bars and Rods (Shape/Form B) N- Not drawn D- Drawn For shape/form P, S, H. O- use N

Example 1: A standard pipe made from aluminium series 6000, of a length of 10 meters, and a weight per meter measurement of 2.5kg/m with a maximum cross-sectional dimension of 8 inches, anodized and not further fabricated nor drawn would have the following PCN:

SP6L2MANN

Example 2: A custom profile including 8 hollows, made from aluminium series 5000, of a length of 1 meter, with a maximum cross-sectional dimension of 100 mm, and a weight per meter measurement of 0.4kg/m, painted and machined, would have the following PCN:

CH5S1SPYN

Please review the PCN structure shown in the table above and include any comments on it in the box provided.

No comments to add.

SECTION A: Company structure and operations

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:	3o Limited
Legal structure (e.g. limited company, sole trader, partnership etc):	Limited Company
Year of establishment:	2003
Other operating names:	None
Company registration number:	04934923
Place of registration:	England and Wales
Name (point of contact):	
Position:	Managing Director
Address:	
Telephone No:	
Email:	
Website:	www.3olimited.com

A2 About your company

1. Please describe the role of your company, in the UK market, for the like goods and/or goods concerned, (e.g. buying or selling agent, importer/distributor, importer/wholesaler, importer/retailer or importer/end user).

International Procurement Services
Appendix reference:

2. Please provide details of any changes in the legal form of your business over the past 5 years, for example, mergers, acquisitions and/or sales.



Date	Legal form	Explanation of change
	No changes	

+Add additional rows as required.

3. List and explain all authorisations your company has been required to obtain to import, sell or distribute the goods concerned and the like goods. These may include licences, permits or permissions. Indicate if your company is subject to any direct or indirect, quantitative or other, restrictions on any of these activities.

None
Appendix reference:

4. State whether your company is a member of any representative organisations (e.g. trade bodies/associations/Chamber of Commerce) If so, provide a copy of the relevant documentation.

Aluminium Federation China Britain Business Council
Appendix reference:A2-4

A3 Organisational structure

Please answer the questions below about the internal structure of your company and any associations with other companies. Both natural persons (individuals) or legal persons (e.g. companies) are associated where they meet the definition of 'related persons' in Regulation 128 of the [Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#).

1. Please demonstrate in a diagram and explain the legal structure of your company showing the internal hierarchical and organisational structure, all sites/locations and departments which are involved in the production, importation, marketing, sales, R&D, and/or distribution of the like goods or goods concerned.

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Appendix reference: n/a

2. Please complete **Annex A3 – Operational Structure:**

- Include your company's worldwide corporate structure and affiliations, including parent companies, subsidiaries and/or other associated companies.
- If your company is the subsidiary of another company, please give the name of this company, as well as that of your company's ultimate controlling entity, their registration number(s) and place(s) of registration.
- Please provide the name, address, email address and telephone number for an appropriate representative from each company identified.
- Please list the activities carried out by the company (e.g. manufacturing, administration, sales).
- Indicate the shareholdings you have in the associated company and the shareholdings that the associated company has in your company.

A4 Board members and principal shareholders

1. Please complete **Annex A4 – Owners and Shareholders**, providing a list of all your company's shareholders that owned more than 5% of its shares during the POI, 1 June 2020 – 31 May 2021. Where known, provide details of their activities. Also include the composition of the Board of Directors and Shareholders, including their roles and rights and your company's registered capital for the last five years. Please provide this information for your company and for all its predecessor legal entities.
2. Explain your procedure for appointing the members of the Board of Directors.

The only Board members currently are the two largest shareholders. Any new Board members would be appointed based on detailed interview process and subject to majority shareholder approval.

Appendix reference:

3. If applicable to your company, please attach the latest copy of the following documents (in the original language and in English):
- articles of association and all related documents;
 - business licence if applicable; and
 - proof of registration of the company with the competent authorities.

Please describe what you are submitting and provide appendix references for your attachments in the box below. Earlier copies from the date of establishment



of the company until the present should be available upon request during any verification visit.

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A5 Operational links with other companies or persons

- Please indicate if your company has established long-term agreements with any company/companies located in the UK, the People's Republic of China or in third countries for the production (e.g. sub-contracting), supply and sale of the goods concerned and like goods, or other licensing, technical patent or compensatory agreements. Include:
 - the name and address of the company; and
 - an explanation of the nature of the agreement; and
 - if your company has long-term agreements with other companies for the supply of goods destined for internal sale, e.g. captive use, please provide the contract to demonstrate this.

Company name and address	Nature of agreement	Company registration number	Place of registration
Removed – Commercially sensitive	Supply Contract for Aluminium extrusion profiles		China
Removed – Commercially sensitive	Supply Contract for Aluminium extrusion profiles		China
Removed – Commercially sensitive	Supply Contract for Aluminium extrusion profiles		China
Removed – Commercially sensitive	Supply Contract for Aluminium extrusion profiles		China
Removed – Commercially sensitive			China

+Add additional rows as required

A6 Accounting practices

1. Give the address where your company's accounting records are kept and can be verified by the TRA. If records are maintained in different locations, please indicate which records are kept at which location. If records are digital and do not have a physical location, please mark as N/A.

Records address	What records are held?
N/A	

+Add additional rows as required

2. Please give the financial year convention your company uses for its accounts (e.g., 1 January – 31 December). If any changes have occurred with respect to:
 - The financial period
 - Your legal form, as per section A2 (About Your Company), question 2
 - Your accounting practices over the last five financial years
 - Your accounting practises in the POI, differing from those in your financial statements

Please describe these changes, and any restatements in your financial accounts including reasons for the change and dates.

Financial Year 1 st January – 31 December Limited Company	Appendix reference:
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3. For your company (and for any associated parties involved in the import, marketing or sales of the goods concerned and the like goods and the production, sale and marketing of goods incorporating the imported goods), please attach a copy of your annual reports covering the injury period. This may include: a statement of financial position; statement of profit and loss, and other comprehensive income; statement of changes in equity; cash-flow statement; notes to the accounts and all reports; and the auditor's opinion on these documents.

Removed – Commercially sensitive	Appendix reference:
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4. Please attach a copy of your company's trial balance (in original and spreadsheet form) covering the POI and the most recent financial year. This includes:
- the trial balance which covers the full financial year including 1 June 2020;
 - the trial balance which covers the beginning of the financial year to 31 May 2021.
 - the trial balance from the beginning of the financial year to 31 May 2020

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Appendix reference:

5. For your company and any associated parties involved in the import, marketing or sales of the goods concerned, and the like goods, please attach copies of relevant management reports (e.g. profit and loss statement) for the total organisation and profit centre that includes the goods and like goods. Please provide these reports for the (i) POI and (ii) most recently completed financial year.

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Appendix reference:

6. If your company is part of a group of companies, please attach a copy of the consolidated accounts of the group for the latest financial year.

Consolidated Accounts are not required and are not produced

Appendix reference:

7. Please provide a detailed description of your financial accounting system explaining how sub-ledgers (e.g. costing, debtors, creditors) and other systems (sales and imports) integrate with the general ledger. Please provide a description of how it links to the management accounting system, including any manual interventions. Please also attach;
- your company's chart of accounts;
 - your company's cost centres.

3o Limited, 3o Pty and Guangzhou 3o trading Co Limited all use the same digital accounting suite, SAGE300. It is an ERP system for mid-size companies with integrated sub-ledgers for Accounts Receivable, Accounts Payable and Inventory. Cost centres are not used.

Appendix reference:



8. Describe your accounting policies, where applicable, for:

- the recognition and/or timing of income and the impact of discounts and rebates, sales returns, warranty claims and intercompany transfers;
- the depreciation and amortisation method, and the periods used by your company for each class of asset such as intellectual property, plants, buildings, machinery and equipment (including average useful life and the methods for calculating this);
- provisions for bad or doubtful debts;
- the accounting treatment of general expenses and the extent to which these are allocated to the cost of goods;
- the accounting treatment of finance costs and how these are allocated to the cost of goods;
- valuation and revaluation of fixed assets, and the subsequent treatment of excess depreciation/amortisation;
- treatment of any subsidies or grants;
- treatment of foreign exchange gains and losses arising from transactions;
- restructuring costs, costs of plant closure, expenses for equipment not in current use and/or plant shut-downs.

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Appendix reference:

A7 Your company's products

Please complete **Annex A7 – Your Company's Products**.

1. Please list all main categories of products imported and/or traded by your company and indicate which category covers the goods concerned and the like goods.

Aluminium Extrusion – Includes goods concerned
Plastic Extrusion
Fabricated Products
Finished Goods
Aluminium Die-casting
Plastic Mouldings
Metal Pressed Parts
Print



Consumer Goods
Fastenings
Tooling

Appendix reference:

2. If applicable to your company for the goods concerned and the like goods, please describe your company's Company Control Number system (CCN). Please indicate how your own internal codes correspond to the PCNs provided in the above table on [Product Control Numbers](#).

Part numbers used in our Company Control Number system are the same CCN numbers used by our customers, on whose behalf we work.

Appendix reference:

3. If your company does not use the same product codes across imports, sales and invoicing, please use the expanded table in **A7 - Your Company's Products**, incorporating the corresponding codes. If an associated company produces or sells the goods concerned, please provide the same relevant details for the associated company or companies.
4. If you do any fabrication work on the imported good concerned or produce other goods which incorporate the goods concerned or like goods, please list your produced goods below.

After import to the UK 3o Limited does not carry out any work on the materials it imports.

Appendix reference:

5. Are any of the products that you mention in question 4 above, considered to be an aluminium extrusion?

N/A

Appendix reference:

A8 Product similarity



1. For each type of the goods concerned imported by your company from the People's Republic of China, please provide a technical description, together with sales brochures, if available. Please include information on:
 - technical characteristics;
 - physical characteristics;
 - prices; and
 - any other relevant factors.

The required information has been added into the excel appendix Importer Questionnaire

Appendix reference:

2. Please complete **Annex A8 – Product Similarity**. Thinking about the technical, physical and other relevant factors, how are the goods concerned different to the like goods sold in the UK? Where possible, please provide information about the like goods produced in the UK or imported from other third countries into the UK.

3o Limited provides procurement and supply chain services to its customers on whose behalf it buys products. For like goods sold in the UK, which we buy for our customers, there are typically higher levels of both manual and technical manufacturing processes involved than single level manufacturing conversion which is more commonplace in UK aluminium extrusion manufacturing of standard shapes. The effect of this in the UK market is that the levels of vertical manufacturing integration to be able to produce our products under one roof in the UK is unavailable. The effect of this is compounded profit taking and non-value-added cost of moving materials around within the supply chain of a high cost economy.

It has been my experience that aggregating procurement provides greatest leverage to secure most preferential commercial terms with manufacturing suppliers whom 3o works. It is a business model on which our company is founded and has operated successfully for nearly 20 years.

It is my belief that the aluminium extrusion industry in the UK lacks: UK competition, scale, infrastructure and vertical integration to compete in its own local, regional or global markets in anything but those products for customers who can afford to pay for shorter supply chains and premiums for outsourced processing when processes are not vertically integrated within facilities. Examples of fundamental disadvantages in UK aluminium extrusion plants is the lack of on-site log casting facilities and in-process set-up scrap re-melt capability. Certainly the lack of fundamental levels of on-site vertical integration in UK extruders inhibits their efficiency and adds to uncompetitive costs for the extruded types product we buy.



Buying any product in the UK 'because you can' is not an astute strategy for commercial success or business longevity. If short lead-times, quick turn-around, high stock-turns and other factors associated with local procurement are strategically important more so than price, then there is good argument for UK businesses buying the like goods from the UK. Currently UK suppliers' lead times are commensurately similar or longer than buying material from Asia, as they do not have versatile capacity in all press group sizes to service domestic demand, or are reducing their available capacity to match in-house capacity of billet/ log manufacture.

At a time when cash is cheap and brands are competing internationally, our customers need to source materials from globally best cost supply choices. Typically the global aluminium extrusion market is highly competed by companies with massive scale and vast levels of vertical integration, with numbers of the larger suppliers able to leverage positions in the commodities markets. Hindalco in India would be an example. There are numbers of others in regions as far as South America to Russia and China.

With the closure of plants like Anglesea Aluminium decades ago, the UK has maybe only 2 smelters left? Investment in upstream and downstream plant in the aluminium extrusion industry is massive and without a scale of demand in the home market the underinvestment has left a commensurately uncompetitive industry, best reflected by the volume of UK exports in the same category of aluminium extrusion now being examined.

China, like some other nations has vast numbers of highly invested aluminium extrusion manufacturers with a scale of more than 10 times the biggest manufacturer in UK, which makes it hardly surprising their scale affords lower costs and greater competitiveness.

Appendix reference:

A9 Suppliers of the imported goods

1. Please provide the contact details for each company that supplies you with the goods concerned. If the supplier is not the manufacturer of the goods, please provide the details of the manufacturer, if known, in the table below.

Supplier name	Address	Contact details (email and phone number)	Is the supplier the manufacturer of the goods?



Removed – Commercially sensitive	Removed – Commercially sensitive	Removed – Commercially sensitive	Yes
Removed – Commercially sensitive	Removed – Commercially sensitive	Removed – Commercially sensitive	Yes

+Add additional rows as required

A10 Details of the manufacturer of the goods

- For each supplier that is not a manufacturer of the goods concerned in the table in section A9 above, please provide the details of the manufacturer in the table below, if known.

Manufacturer name	Supplier (from A9)	Address	Contact details (email and phone number)

+Add additional rows as required

SECTION B: Imports and forward orders

B1 Imports

Please complete tables **Annex B1- Imports**. Where asked, please indicate the CIF value and quantity of the goods concerned or like goods imported. Where the source of imports is **NOT** the country where the good was produced, if known, please state the country of manufacture.

B2 Details of import transactions

1. Please complete the **Annex B2 - Import Transactions**, providing transaction level details of imports of the goods concerned from the People's Republic of China during the period of investigation.
2. Please provide invoices and any supporting documents for two of the transactions stated within **Annex B2 – Import Transactions**. Use the box below to give an overview of any supporting documents provided.

Removed – Commercially sensitive

Appendix reference:

3. Referring to the costs you stated in **Annex B2 – Import Transactions**, for the goods concerned please explain the costs incurred by your company between frontier and arrival of the goods at your warehouse and categorise them as duties, import costs or post-import costs. Are these costs incurred as a percentage of the purchase price, or as a fixed amount per unit of the goods concerned?

<p>3o Limited buys materials from suppliers on a variety of different incoterms. Contract terms exist for each of the different aspects of the manufacturing process which are in turn added to a prevailing LME published rate for the commodity cost. There are a number of stipulated conditions for the contracted terms that determine whether additional Minimum Order Quantity (MOQ) costs are added. Additionally if we consolidate materials from other suppliers local transportation costs may also be levied. In the instances these MOQ or local transportation costs have been incurred they have been spread across the cost of those materials ordered at that time on a distribution of weight of material within the shipped consignment.</p>



Freight costs have been detailed as invoiced for the duration of the recent period of elevated and volatile freight costs. As have intermodal freight costs during the same period when shipments have been delivered to different UK ports. During the early periods of investigation the freight, clearance and intermodal costs have been taken from monthly contracted rates rather than tracking individual invoices from our logistics supplier. This may mean that some periodic extraneous costs have not been recorded. To enable clarity the detailed cost analysis in Appendix B2 shows FOB costs NOT CIF costs. Accumulated CIF costs have been used in B1. It therefore enables clarity in the POI particularly where freight costs have significantly elevated the CIF cost for landed goods, alongside the significant increases in LME. The FX rates show an increasing expense at outset followed by a strengthening Pound when LME rallied and freight became volatile and massively inflated. Freight costs per transaction have been allocated against each item on a distribution of weight of material within the shipped consignment.

Transactions included into the different periods of interest have been timed on the BOL dates, which is the date from which payment terms are counted; rather than from invoice date. This creates a timing issue for what is included/ excluded in the POI, particularly at the end of the period when significant delays were experienced at Chinese ports and some sailings were cancelled due to COVID outbreaks in the ports of South China that we use.

Duty costs have been calculated by adding 6% on the cost of freight and FOB costs then apportioned at line item level of transactions. Within a reasonable level of accuracy the totals are correct to our C88 statements, although there are small differences created by FX exchange rate variances between our accounting FX rate and the rate used by HMRC at the tax point rather than invoice / receipting dates some month before. I do not believe these make a material difference to the overall costing picture presented.

Freight, clearance, and intermodal costs have been apportioned as a function of weight of material within a shipped consignment. This would have been more appropriate if done as an apportionment of CBM; but a lack of time has not afforded this to be done.

But for one exception during the period illustrated goods are delivered directly to customers' own warehouses and not stored by 3o; who do not own a warehouse but do use subcontract facilities from time to time.

Appendix reference:

B3 Forward orders

Please provide details in **Annex B3 - Forward orders** and attach copies of forward contracts/ongoing supply agreements for the goods concerned for up to one year ahead. Comment on these forward contracts – are they a usual way of doing business in your industry? Has there been any variation in the volume and value of forward contracts over time? If so, what has caused this variation?

Our business has typically operated on spot contracts where we place orders to our suppliers only when our customers place orders to us. 3o is not a trading company and does not speculate on either commodity or FX rates that it feels could be favourable.

Our framework contracts with suppliers typically operate for a period of years and do not compel purchase of any volume during the term. In that respect we do not have any forward contracts. Whilst some suppliers and customers do operate a commitment to purchase particular volumes of material at fixed prices, we operate at ongoing and prevailing market rates for commodity and FX.

In summary we have not seen any variation in volume or value of our orders over time from forward contracts. The volume and value of our transactions has increased in one area and diminished in another. The increase is from a new client introducing a new range of products to both their and our business. The diminished volume is a reactive reflection to elevated freight costs that have contributed to reduced volumes transacted in like type products during the POI.

Appendix reference:



SECTION C: Sales and selling expenses

C1 Sales of the goods concerned

Please complete **Annex C1 – Sales.**, providing annual sales figures for the goods concerned imported from the People's Republic of China and the like goods from all other countries imported into the UK by your company. Please state the value and quantity of these goods sold in the UK or re-exported during the injury period. Where known and if applicable, please state each source country of the like goods in a separate row, if this is not the People's Republic of China.

C2 Sales of goods incorporating the goods concerned and/or like goods

If applicable, please complete **Annex C2- Sales incorporating the goods**, providing information on the value and volume of goods produced by your company **incorporating** the goods concerned or like goods, where the goods concerned or like goods are sourced from the People's Republic of China and all other countries and the end product is sold in the UK or exported.

C3 Sales transactions

Please complete **Annex C3- Sales transactions**. Please provide the requested information for the goods concerned you sold on the UK market during the POI. Where goods identified as different PCNs are sold under a single invoice, please provide information for **each PCN** within the invoice as a separate row. Please contact us if you can't provide the information at the PCN level of detail.

Please provide invoices and any supporting documents for two of the transactions stated within **Annex B2 – Import transactions**. Use the box below to give an overview of any supporting documents provided.

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	Appendix reference:

Column Heading	Explanation
Country of origin	Country of origin of the goods imported.



Column Heading	Explanation
PCN	Please see Product Control Numbers
Order date	The date the order was placed
Customer name	The name of the customer as reported on the invoice.
Customer address	Address of customer as it appears on the invoice.
Level of trade	Customer level of trade (distributor, end user, retailer etc)
Credit terms (days)	The maximum number of days for payment without incurring penalty charges.
Date of contract	Date shown on the contract
Invoice number	The number denoting the invoice. The number as stated on the invoice.
Invoice date	State the date on the invoice. Use the format DD/MM/YYYY (e.g. 23/05/2019).
Transaction unit	The unit used to measure or express the goods, per transaction in the invoice. Indicate the unit as stated on the invoice. Where appropriate, use an abbreviation (e.g. 'kg' for kilogramme or 'l' for litre).
Quantity in transaction units	The quantity of the transaction expressed in the units described on the invoice.
Gross invoice value (£)	The invoice value inclusive of any taxes. Numerical input – keep all figures to two decimal places. Use a full-stop as a decimal separator (e.g. 1,300.00). Use this format for all appropriate subsequent fields.
On-invoice discounts	The amount for each discount as shown on the invoice. Create a new column if there is more than one discount applied to the invoice. Label each discount with a distinct and appropriate name or as 'Discount 1', 'Discount 2' and '0.00' if not applicable
Off-invoice discounts	The amount for each discount as negotiated but not on an invoice. Create a new column if there is more than one discount applied to the invoice. Label each discount with a distinct and appropriate name or as 'Discount 1', 'Discount 2' and '0.00' if not applicable
On-invoice rebates	The amount for each rebate on the credit note or invoice. Create a new column if there is more than one rebate applied to the invoice. Label each rebate with a distinct and appropriate name or as 'Rebate 1', 'Rebate 2'.



Column Heading	Explanation
Off-invoice rebates	The amount for each rebate not on the credit note or invoice. Create a new column if there is more than one rebate applied to the invoice. Label each rebate with a distinct and appropriate name or as 'Rebate 1', 'Rebate 2'.
Taxes	Amount for each tax included in the gross invoice value. Create a new column if there is more than one tax applied to the invoice (e.g. VAT). Label each tax with a distinct and appropriate name or as 'Tax 1', 'Tax 2' and so on and provide a legend.
Net invoice value (£)	Please provide the net value as shown on the invoice.
Delivery terms	Terms of delivery e.g. delivery to store; customer to collect; .
AS&G	Administrative, selling and general costs are operating expenses not included in the cost of the goods sold, incurred to promote, sell and deliver a product, and manage the overall company. This is normally reported on the company's income statement and will need to be apportioned to each PCN.
Handling charges	Any costs incurred in fulfilling the order that are not packaging or transportation costs.
Re-packaging	Cost incurred in of repacking the good for the UK market incurred after importation.
Transportation costs	Costs incurred in transporting the good to the customer, net of packaging and handling charges.
Commission	Any commission paid in relation to the sale and delivery of the good
Other	Any other cost associated with the sale of the good concerned e.g insurance. Create a new column if there is more than one "other" cost.



SECTION D: Cause of injury

The purpose of this section is to collect further information as to the cause of the alleged injury. Note that the information submitted at this point can only be taken into account if supported by **factual evidence**.

1. Aside from the imports of the goods concerned from the country under investigation, please provide details of any other reasons that could have resulted in the alleged injury suffered by the UK industry, for example: contraction in demand or changes in the pattern of consumption of the like goods in the UK or developments in technology.

So do not have any information to support why UK industry feels it has suffered an injury. To the contrary there are many reasons I've described in A8 why UK industry lacks competitiveness through a failure to invest in its processes in the same way others have; which I believe will see a continued demise of the industry in the UK in all but the most basic types of commoditised product or highly specialised products for targeted upstream customers/ manufacturers. The fundamental lack of vertical on-site integration combined with escalating energy and domestic transportation costs with an increasing level of value-added finishing and fabrication being demanded by end users alongside increased domestic production lead-times is driving UK consumers elsewhere.

A distinct lack of customer service and failure on the part segments within UK industry to fulfil simple manufacturing and supply services has become apparent and examples UK industry as not having the injury-caused extra capacity it decries caused by imports.

The perceived cause and unsubstantiated hearsay for some UK Extrusion manufacturer's lack of capacity is their choice to pick longer run, one-off orders for national infrastructure projects which have been prioritised over shorter run orders from customers' who have given them support over decades of relationship; but are shorter run lower value production. The longer run orders result in blocking out capacity within key machine group sizes for extended periods of time. This combined with some orders not being fulfilled where house made billet and log are immediately unavailable, because other sizes have been made in preference/ lack of capacity, and/ or choice is being made to not buy in from 3rd party smelters; particularly in the face of the recent and significant rise in billet premiums in the wider EU and UK market. This billet premium rise can only be being driven by increased demand from greater switched local demand caused by anti-dumping duties being levied by EU on



Chinese imports. A perfect example of price inflation being driven directly by EU's action on China and it being bad for competitiveness and all upstream manufacturers. The UK clearly doesn't have the smelting capacity to resist these wider market effects from within its own borders.

Whatever the root cause of long domestic lead times, some upstream manufacturers are being forced to fly incredibly expensive batches of metal into the UK rather than see their plants closed waiting for UK extruders to supply.

I am fearful for UK consumers/ upstream manufacturers of the goods being investigated being able to keep their factories running without stockout and periodic closure if left to the devices of UK extrusion manufacturing, or if they can to do so without incurring significant cost increases either by effect from EU's action or any negative findings from this ongoing investigation.

There are simply not enough machines in the UK to produce all of the short run demands when changeovers are not SMED (Single Minute Exchange of Die) efficient. Customers depend on their supply chains to be responsive, for any and all orders, whether 9kgs or 90 tonnes. Out of the 269 line item shipments imported by 30 during the injury period, 89 have been for less than 100kgs of material, 179 for less than 500kgs and 207 lines have been for less than 1T and totalling less than 40 tonnes. The strong indication from UK industry is that they are uninterested in doing this type of 'spaghetti' low volume business, even for the largest 8/ 269 line items that have an average of 128 tonnes over the last 2 years. These few 'more attractive' line items are inextricably linked to the tail of low volume items as they are typically part of a 'system' that needs to be perfectly colour matched by finishing/ painting batches of multiple 'system' products together.

Without access to as many machines and capacity, as at this current time, upstream UK industry will find breakdowns in supply chains caused by fundamental failures in supply chain capacity and availability. This situation is best exemplified by what has gone on in like type and similar situations in the EU; where anti-dumping duties have been levied on Chinese imports and the Chinese supply capacity cut off, EU manufacturers couldn't keep up with supply through lack of capacity, causing domestic prices to be artificially increased (as demand outstripped supply – price gouging) and causing damage to upstream industries closing and becoming uncompetitive. In this instance the EU suspended anti-dumping duties on Flat Rolled Products (FRP).

EU supplier prices for Aluminium extrusion and capacity availability are causing similar problems to those experienced with FRP. It is a highly credible proposition that the UK Aluminium Extrusion or smelting sectors do not have the capacity to replace the volume of material coming from China, and furthermore after available



capacity was taken out of the EU market massively constraining supply, the opportunity for UK upstream to buy from other regional markets is also marginalised and dependency placed onto a UK sector that is ill able to service the demand it enjoys today.

Our up-stream industries compete in global markets and need to access best global supply.

Our up-stream customers operate in an industry sector that requires investment of both time and money to operate. It takes a long time to set up to be able to work in their markets and it is expensive to do so. This is significant in terms of both capital equipment as well as time to complete certification and testing which is specific to individual suppliers' manufacture. Changing supply takes months of activity. Whilst a new die can be cut in a few days it takes months to secure applicator licences and go through extensive mechanical and UV age performance and fire testing procedures. Persuading the UK extrusion industry to make easy products is currently difficult. Persuading them to take on getting their third-party finishing company to get an applicator licence from another third-party technical paint supplier to offer a 25-year finish warranty for a spaghetti basket of low volume, low value products (they're very light) is unlikely to be straight forward.

When you are working with a supplier who is vertically integrated and already has the relationship with the paint supplier who can provide the 25-year warranty for the A2 fire tested and rated material you avoid the difficulty of trying to persuade another who is less well equipped to do the work.

At the moment there is gourmet feeding frenzy going on in EU and the surrounding region; brought about by China being locked out of supply to EU. I have recently sent out enquiries to 10 different suppliers in EU and near regions to find that most won't even respond and are entirely uninterested or unable to supply the products we are trying to buy, either because they have better opportunities elsewhere or they are not sufficiently vertically integrated to do what we require.

It is my fundamental honest belief that China is not dumping aluminium extrusion into the UK market. There is no state sponsored acting going on. The reason I feel able to make this statement is that within the small group of companies I own and operate, one such company buys aluminium extrusion in China for use in manufacturing in China and the prices are the same at source and by the time the aluminium extrusion is shipped to UK its import value is significantly higher; irrespective of whether the purchased materials ingot cost is based on SHFE, SMM, NHLT or LME. We track these commodity market prices daily. If there are entities or individual companies who are importing aluminium extrusion into the UK market at a cost that is lower than same material would be available in the domestic Chinese market, and dumping



material, then these individuals or entities are acting alone and should be punished alone. If Chinese extruders are setting up distribution entities in the UK to facilitate 'dumping' the Chinese extruder owned entities should be excluded from establishing these entities in the UK and licences should be awarded to accredited importers from China.

In the matter of the period during which injury is supposed to have taken place, these products we import were not available in the UK market. The primary import of these products is during the POI. They are new products that we helped develop and bring to market for the first time for our customer. They are imported because there isn't the vertically integrated manufacturing capability to in the UK to make them. At no time have 3o imported these materials or any materials from China at a lower cost that they are available in the Chinese domestic market.

Appendix reference:



SECTION E: Economic Interest Test

The economic interest test helps the TRA assess the economic impact of a measure compared to what would happen if it was not imposed. There are six factors which the TRA must consider as part of the economic interest test:

- i) The injury caused by the dumped goods to UK industry and the benefits to that industry in removing the injury.
- ii) The economic significance of affected industries and consumers in the UK.
- iii) The likely impact on affected industries and consumers in the UK.
- iv) The likely impact on particular geographic areas, or particular groups, in the UK.
- v) The likely consequences for the competitive environment and for the structure of markets for goods in the UK.
- vi) Other matters that the TRA consider relevant.

The questions in this section will contribute to this assessment. Please provide information broken down by each of your company's UK sites/facilities, where relevant and possible.

E1 Background

1. Where possible, please provide an overview of your supply chain for the goods concerned, from raw materials through to final customers (i.e. what are the goods made from and what is produced using them). Please include the name and location of UK companies involved at each stage where available.

3o buy aluminium extrusion products from vertically integrated aluminium extrusion companies in China. Our suppliers buy ingots which they smelt into 6063 aluminium logs. The logs are fed directly into the extrusion machines though gas fired log shear machines. Any waste in the setup of tooling/ dies is fed directly back into the smelter for re-use. The tooling/ dies used in the manufacturing process are made and maintained on site.

The extrusion is homogenised on site to achieve the required T6 hardness. On the same site the product undergoes a paint pre-treatment passivation process, before going on to a 5m vertical painting line where it is painted with a technical architectural paint. The product is then cut to length and packaged into palletised crates. All of which happens on the same site. Suppliers have tested and certified the pre-treatment and vertical paint lines, providing an 'applicator' licence for the facility to use their paints and warrant the products in service. The goods are packed and wrapped in customer branded packaging materials before being containerised on site



and shipped through a deep-sea port in South China. The shipping is managed by our shipping agent, who also process the C88 and importation for us. Once goods are cleared the container is collected from port and delivered to our Customer. The container is delivered directly to our customers' facilities. Unloading is undertaken by the customer teams. The products supplied are system products.

The containers typically arrive to Felixstowe but have recently during the freight difficulties also been delivered to Southampton.

Appendix reference:

2. If you have not provided this before, please provide the names, legal addresses and telephone numbers of all known domestic companies
- that produce the like goods
 - that are involved in the importation, distribution or sale of the goods concerned.

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Appendix reference:

3. Please indicate, which industry or industries are the main consumers of your sales of the good concerned or the like good.

Building, architectural and furniture products

Appendix reference:

E2 Your company

1. Please provide the physical addresses (including town/city and county) of all your company's UK sites/facilities involved in the importation of the goods concerned.

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Appendix reference:

2. Please complete **Annex E1 – Economic Interest Test** providing employment figures in FTE (full time equivalents) and median annual gross wages for 1 June 2020 – 31 May 2021, for all your company's activities in the UK relating to the

goods concerned. Where possible, provide sub-totals for each of your company's sites or facilities. If you are unable to provide median wages, please provide mean wages. Would these wages be affected if an anti-dumping measure on the goods concerned were not imposed? Please substantiate your claims with evidence. Where possible, please provide estimates for future years (e.g. projections or forecasts) and explain the method used to calculate them.

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Appendix reference:

3. Please state your share of the domestic market for aluminium extrusions based on sales volumes (including imports of the goods concerned and like goods as well as domestically produced like goods). Indicate how this share would be affected if an anti-dumping measure were not imposed? Please substantiate your claims with evidence. Where possible, please provide estimates (e.g. projections or forecasts) for the next five years and explain the method used to calculate them.

The volume imported by 3o into the UK will not increase if an anti-dumping measure is not imposed. In the course of the last year through the POI our volume has diminished in response to significant freight costs being imposed in the market. Knowing how this is likely to change in the coming 5 years is impossible to tell, other than if freight prices remain at their current level for very much longer there will be dynamic shifts in supply chains, in the medium term, away from China and the Far East. Freight prices are not expected to reduce to the levels seen during the injury period and as such it is expected that overall volume will continue to reduce.

Appendix reference:

4. Please comment on how significant are the imports of the goods concerned are in relation to your company's overall volume of imports. Within your response, please state the share of total import value represented by the goods concerned during the 1 June 2020 – 31 May 2021.

Imports of the goods concerned are of great significance to our company performance and sustainability.

Appendix reference:

5. Are the like goods that you purchase from other countries available at a comparable price?



All of the materials we purchase today are bought from China, because our company is a China sourcing company. Our infrastructure and back office, that controls and oversees the goods in manufacture, is based in China. Regional benchmarking demonstrates that the manufacturing products we buy in China, and are widely available in China, are not widely available with as much competition elsewhere. The issue is less fundamentally about price but more about the availability of vertically integrated facilities across a wide spectrum of finishes, shapes, sizes and fabrication.

Each of the different individual manufacturing process are available but typically only by joining the facilities of multiple suppliers or facilities together. The effect of this is that costs are significantly increased through multiple handling and transportation of goods from site to site. For example:

Where we have products which have extruded, mechanically polished and chemically brightened which have resin poured thermal breaks; there are zero companies in the UK that can do this and a limited number in the world compared to those who solely focus on raw mill extruded products. The global majority of manufacturers who can produce these items are in China.

It is quite likely that in the coming years our supply chain operations will extend into other regional areas of Asia and Asia Pacific; following the investment funding of Chinese entities trying to replicate their business facilities/ activities in low-cost labour economies, as China's labour costs continue to rise.

Prices and services for like type materials from South East Asia are becoming comparable with China with the ongoing infrastructure investments being made.

Appendix reference:

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

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Appendix reference:

E3 Potential impacts of a measure



1. Please explain your choice to purchase the aluminium extrusions you require from the People's Republic of China over the domestically produced good? Your response could mention the availability of goods, prices etc.

Our company have bought aluminium extrusions from China for the last 18 years.

The products we buy are typically 'value added'. Many products we buy from China would need redesigning to use the processes available in the UK.

The capital facilities and equipment invested in by UK industry is more expensive than that used in China and consequently is more expensive to operate creating higher purchase prices combined with the higher costs of both other direct (labour) and indirect overheads for the businesses to operate. The lack of single site vertical integration compounds these issues.

With the introduction of a new integrated paint line in one of UK's extruders facilities, there will be ability to do more; but it is likely that this will be affected by the same lack of economy as their other processes for like products so import. The acquisition led nature of some extrusion groups and the establishment of UK group entities presents challenges to achieve a single point of purchase for buyers, when resources are split across multiple sites.

Appendix reference:

2. 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. Please mention any specific products that were impacted.

Since the outset of this investigation we have tried to get quotes from other European and close regional suppliers. The lack of response from these suppliers is deafening. The apathy to exploring opportunities to secure new business is illustrative of busy factories and a lack of capacity. Too busy to not even offer a holding response. It suggests they've got too much to do already and insufficient capacity to respond.

Appendix reference:

3. Please describe how you would expect the implementation of a trade remedy 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 from the UK.



Where possible, please provide estimates for the next five years (e.g. projections or forecasts) to support your claims.

I would expect the implementation of a trade remedy in the UK to immediately increase the market price of the concerned and like type goods. I expect UK manufacturers to price gouge the market; as buyers will have nowhere else to buy like type goods from anywhere of close proximity, and particularly with what is happening in EU and the lack of available capacity in the EU market following the trade remedy carried out there on wider section of like type goods.

Our current experience is that UK output is already close to capacity and is unlikely to generate more output without more capacity being added. Which raises the question about whether any damage was done during the injury period if during the POI they are unable to fulfil existing UK demand. Having capacity and having the 'right' press group capacity are two wildly different things.

In the short term I would expect total imports to UK of the goods concerned to reduce, whilst companies are less easily able to travel, during COVID travel restrictions, to find other import alternatives. In the medium term I would expect imports to resume and potentially increase above any historic level, driven by the expected market price increases/ price gouging in the UK.

I expect UK exports to diminish in the short term as UK manufacturers gouge UK consumers of aluminium extrusion in the selected HS code categories with all of their available capacity. I would not expect UK exports to recover.

Appendix reference:

4. Do you know of any related industries that might be affected by the implementation of a trade remedy? Please consider in particular:
- upstream industries – those who produce inputs (such as raw materials) needed for the like goods or goods concerned;
 - downstream industries – those who purchase the like goods or goods concerned.
 - industries for complimentary goods – those which would typically be bought alongside the like goods or goods concerned (such as printers and ink).
 - industries for substitute goods – those which might be brought instead of the like goods or goods concerned (such as margarine and butter)

Our primary customer for goods that could be affected by a trade remedy operate in a global market, competing with companies based around the world. They would see



their input prices rise and propensity to compete with other global competitors diminish.

In the building industry and in particular in the UK the doors and windows industry use significant quantities of reinforcement bars. Historically when aluminium prices have been high, users have swapped their reinforcement bars to be made from roll formed steel instead of aluminium. Quick innovation to use WPC, GRP, etc and other alternatives would likely be a short- and medium-term measure to avoid the increases likely from an enforced UK purchase.

In Australia similar trade remedies were enforced to those being considered by UK; the effect was the upstream industries closed facilities and outsourced entire factories to China where the goods being affected by trade remedies were combined into a higher level of product and classified outside of the trade remedy affected HS codes. Our company helped close one of these factories and take off-shore all of the manufacture. The Australian company involved felt it had no option that to do this as otherwise they felt the entire company would be terminally affected by increased input costs and be unable to compete in their market. This also had the effect to close complimentary goods factories who were previously supplying the Australian factory, as well as the jobs lost in the re-structuring. Other examples in Australia was the onset of 'flat-pack' truck (Ute) bodies being imported, prefabricated doors and windows, fencing, flagpoles, gates, marquees and numerous general other products that use aluminium extrusion.

The overwhelming feature is that if end product costs can't be controlled the market will find a way to adjust itself.

Appendix reference:

5. To what extent would you expect any changes in prices for the goods concerned, should a trade remedy be implemented, to be passed onto final consumers?

If a trade remedy is imposed I would expect the entirety of it to be passed on to the upstream prices of goods concerned unless some means can be achieved to avoid the impact as described in my answer above. I believe this because all of the customers we support have passed on all of the cost increases that have been incurred from increases in freight prices over the last year, and many of them have broken with the tradition of annual price reviews to make those changes with immediate effect. Last year one customer whom we did work with chose to stop buying imports through us and now buy from Turkey.

Appendix reference:



6. 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 imposing of an anti-dumping measure might disproportionately affect any of these groups. Please enter your response in the box below.

The imposing of an anti-dumping measure would not disproportionately affect any of these groups.

Appendix reference:

7. Please explain how imposing a trade remedy measure could affect the following aspects of the competitive market environment and structure for aluminium extrusions in the UK:
- the range of suppliers of aluminium extrusions in the UK;
 - the ability of suppliers to compete in this market;
 - the incentives for suppliers to compete vigorously;
 - consumer choices and information available to them
- Please provide evidence to support your answer.

The aluminium extrusion manufacturing sector in the UK could be considered an oligopoly and for some processes a monopoly. There are very few competitors and little resulting price competition between them. The market is relatively mature, and has insufficient demand to incentivise new competitors in the market. Any competition comes from imports. Trade remedies in EU and other global markets to the effect of exclude China imports, through trade remedies, have significantly impacted non-Chinese global supply capacity. Supply capacity and competition to those 'non-China markets' has consequently reduced and would consequently leave UK at the tail end of a supplier price gouging frenzy or complete apathy to supply UK consumers of the like type goods. I believe introducing trade remedies will not increase the ability of suppliers to compete in the market, moreover I believe it will do



the opposite and remove the main vehicle of competition for UK manufacturers. Suppliers will compete not vigorously but greedily auctioning capacity to the highest bidder.

Appendix reference:

8. Please describe the nature and degree of any regional impacts that you anticipate from the imposition of a trade remedy measure.

To describe the effect of a trade remedy measure when I have no understanding of how a remedy would be applied is unanswerable. If a trade remedy were applied across all imports whether dumped or not dumped, but originating manufacture in China, it would have a completely different effect than if it were applied only to a target group of importers known to be dumping. If a trade remedy was applied against all Chinese imports of aluminium, I believe the likely effect will be:

- price rises in UK extending upstream to consumers
- increase of upstream products facing competition from finished product imports
- significant losses of UK jobs as upstream manufacturers off-shore higher levels of their manufacturing operations to avoid a trade remedy

I don't see any positive outcome for UK PLC by applying trade remedy measures.

The current HS codification system is too generic and broad to offer a refined approach to the sledge hammer type tool, of trade remedy measures, to apply against dumping; particularly where customised and niche bespoke products are classified among commodity goods.

Appendix reference:

9. If there are any additional economic factors that you consider to be relevant for the economic interest test in this investigation, please provide details here along with any supporting evidence.

Revamp HS codes, segment dumped goods and smash dumping where it's non-beneficial to UK PLC, exclude overseas dumping groups using licences to operate. Do not throw the baby out with the bath water.

Appendix reference:



SECTION F: Next steps and declaration

Next steps

Once you have completed all parts of the questionnaire, the declaration on the following page should be signed by an authorised official of your company.

The questionnaire, spreadsheet annex and any appendices should be submitted through the Trade Remedies Service (www.trade-remedies.service.gov.uk) by 18 August 2021. The checklist in Section G of this questionnaire may help ensure your submission is complete.

A confidential and non-confidential version of the questionnaire and spreadsheet annex(es) must be submitted. You can find guidance on how to complete confidential and non-confidential versions in our guidance on [how to submit information](#).



Declaration

By signing this declaration, you agree that all information supplied in this questionnaire (whether translated or not) is complete and correct to the best of your knowledge and belief and confirm you understand that the information submitted may be subject to verification by the TRA.

Company name: 30 Limited.

24 September '21

Date

[Redacted Signature]

Signature of authorised official

[Redacted Name]

MD

Name and title of authorised official



SECTION G: Checklist and appendices

This section is an aid to ensure that you have completed all sections of this questionnaire.

Section	Please tick if you have responded to all questions
Section A – Company structure and operations	✓
Section B – Imports and forward orders	✓
Section C – Sales and selling expenses	✓
Section D – Cause of injury	✓
Section E – Economic Interest Test	✓
Section F – Next steps and declaration	✓

+Add additional rows as required

Please list any appendices that you have referenced in your responses and are attaching with this questionnaire.

Appendix reference	Document title
Removed – Commercially sensitive	

+Add additional rows as required