



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

Period of Investigation (POI):	01/06/2020 – 31/05/2021
Injury period:	10/06/2017 – 31/05/2021
Deadline for response:	16 August 2021
Contact details:	AD0012@traderemedies.gov.uk
Completed on behalf of:	Global Extrusion Direct Ltd

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

- ☐ Confidential
☒ Non-Confidential – will be made publicly available

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



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Introduction

About us, this case and this questionnaire

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

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

Why should I take part?

You have received this questionnaire because your company has been identified as a downstream user or consumer of aluminium extrusions. We are asking you to complete it to help us understand the economic impact of imposing, or not imposing, trade remedy measures. The information your company provides will help us to conduct the Economic Interest Test.

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

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

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

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

- Is based in the UK and uses UK-produced like goods;
- Is based in the UK and uses the goods concerned;
- Is based in the UK and uses like goods produced in third countries (a country other than the UK or The People's Republic of China).



How do I respond?

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

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

Where can I find more information?

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

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

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

Instructions on completing this questionnaire

Preparing your response

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

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

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

How to answer the questions

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



us verify your information, please retain all these documents, your completed spreadsheet annex and any calculations you made when developing your responses.

Please also note the following points:

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

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

Preparing confidential and non-confidential copies



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

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

In preparing your response, please note the following:

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

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

Providing information from subsidiaries or associated parties

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

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

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

What happens next



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

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

The scope of this investigation

Goods concerned

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

This investigation covers **aluminium extrusions** originating in the People's Republic of China, destined for consumption in the UK 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 commodity code(s): 76041010; 76041090; 76042100; 76042910; 76042990; 76081000; 76082081; 76082089; 76109090. These CN codes are only given for information.

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

Like goods

In addition to the '**the goods concerned**', we want to know about '**like goods**'. Any reference to '**like goods**' in this questionnaire refers to goods which are like the goods concerned in all respects, or with characteristics closely resembling them, produced in the UK or anywhere else in the world except The People's Republic of China and sold in the UK.

Downstream products

While downstream products will not be covered by any trade remedy measure that we decide to introduce in this investigation, we need information about them to conduct the Economic Interest Test. The aim of the Economic Interest Test is to assess if the application of a possible trade remedy measure is in the economic interest of the UK, considering effects on wider industries as well as the directly affected UK industry.



We would also appreciate any information you have on your purchases of the like goods and goods concerned.

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

SECTION A: Company details

A1 Identity and contact details

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

Legal name of company:	Global Extrusion Direct Limited
Legal structure (e.g. limited company, sole trader, partnership etc):	Limited
Year of establishment:	2019
Other operating names:	N/A
Name (point of contact):	[REDACTED]
Position:	Director
Address:	[REDACTED]
Telephone No:	[REDACTED]
Email:	[REDACTED]
Website:	Globalextrusiondirect.co.uk

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

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

A2 About your company

1. Please describe the role of your company in the UK market or supply chain for the like goods and/or goods concerned (e.g. distributor or end user). Furthermore, please provide details on how your company uses these goods.



Working as a consultant with Press Metal UK Ltd are suppliers of fabricated and finished aluminium – we provide the services of cutting, painting, welding and assemble for various clients. The raw aluminium material is converted into an end-product, such as a ladder, partition, window frame, medical equipment and many more industries.

Appendix reference:

2. If you use the like goods and/or goods concerned as a component or input to production, please specify the product you manufacture using them.

*The aluminium extrusion is purchased and converted into the following:
Medical hoists for hospitals
Medical trolleys
Stair lifts
Operating tables
Marquees
Street furniture
Electrical trunking*

Appendix reference:

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

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

4. Please list any changes relating to the purchase, distribution and/or use of the like goods and/or goods concerned since the start of the POI (for example any change in the price, origin of supply, or use).

The threat of imposed tariffs will result in certain markets being affected in terms of guaranteed supply of material. Costs will increase to a level that is not viable. Many are requesting that we back up supply locally, which is not possible as UK and European suppliers do not have the free capacity to assist, and their lead-times are extended beyond a reasonable timeframe.

Appendix reference:



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

Prefer not to include as they are wage based rather than company accounts.

Appendix reference:

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

SECTION B: Purchases and use of the goods

1. Please use **Annex B.1 Purchases by origin** to indicate your company's sources of the like goods and/or goods concerned, and any other potential sources of the like goods and/or goods concerned that you did not use during the POI and the 12 months preceding it. Where possible, please append a proof of sale, such as an invoice, for one transaction with each company you have bought from.

The goods purchased are comparable in terms of the price, quality and the assurance of supply is very important. After 15 year relationship with PMUK there is a confidence in the service they provide, quality of product is exceptional and delivery within the agreed period will take place, this cannot be said for other UK and European suppliers.

Appendix reference:

6. How do domestically produced like goods compare to imported goods in terms of:
- price,
 - distribution channels, and
 - other non-price factors (such as product quality, lead and delivery times, reliability of supply, grade of material)?

Please identify and explain any differences between the goods concerned that imported from The People's Republic of China and those originating from other countries.

The price of goods for domestic sources are in some cases inferior in quality, and comparable in cost. Lead-times fluctuate which results in delays and on costs in finalising the product. Not all domestic suppliers have an ability to provide the turnkey level of service, therefore requires the need to ship to a number of sub-contractors to complete the requirements that adds time and unnecessary costs which can make the product not commercially viable.

Appendix reference:

7. Please use **Annex B.3 Products sold** to provide a description of each good sold by your company which uses the like goods and/or goods concerned as an input. Please consider average sales price per unit and profit per unit. If your company is a manufacturer, please indicate what **proportion of production costs** are attributable to the like goods and/or goods concerned.
8. Please use **Annex B.4 Customer information** to provide a description of your main customers for each of the goods listed in **Annex B.3 Products sold**, providing their location and the nature of their business where possible.



9. Please state your company's total sales revenue for the POI and the 12 months preceding it for each product you sell which is a downstream product of the like goods and/or goods concerned, using **Annex B.5 Total sales revenue**.

SECTION C: Impact of measure

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

I am working as a consultant with Press Metal UK Ltd. During the EU provisional anti-dumping measures, the impact and threat caused a great deal of uncertainty. Clients reacted in backing up supply with domestic suppliers, only to discover that they could not achieve their requirements. From a business perspective it caused anxiety and unrest in not knowing what the future held. Orders were put on hold and or cancelled in some cases. Long established relationships with clients stretched to the limit with the news of additional costs not allowed for within the product cost structure.

Appendix reference:

2. How would implementation or non-implementation of a trade remedy affect your company and industry?

It would depend on the level of implementation that is finalised and on what categories of products. The fact that TRA is taking place at this time is already impacting as it is causing the same uncertain disruption that it did 12 months ago during the EU provisional measures.

Appendix reference:

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

Very difficult to measure and provide, but for certain markets sectors that we deal with will be forced to source elsewhere with domestic suppliers so to overcome any further potential increases. We would estimate a 25% - 40% reduction in the sales that we provide to PMUK.

Appendix reference:

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



As previously mentioned, I am a consultant for Press Metal UK Ltd and are judged on results, therefore any reduction in sales will impact financially on my business.

Appendix reference:

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

Growth would be limited in terms of clients. Plans for future development and investment would have to be put on hold until the impact of any implementation is known.

Appendix reference:

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

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

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

We see market rates in the UK increasing as any implementation will force certain sectors down the domestic route. That will result in huge capacity issues with domestic suppliers and in turn increased costs. Global costs for aluminium are currently at an unprecedented level and we fear will continue to increase to levels where certain markets will have to review the option of switching the substructure, i.e aluminium to an alternative material to make viable. The impact on the market for goods will in turn escalate, making the product non-viable in the UK.

Appendix reference:

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

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

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

The imposition of trade remedy measures will drastically reduce the range of suppliers available to consumers, but more importantly take away a capacity that the domestic market will be incapable of fulfilling. This then narrows the options for the consumer and allows the domestic market to pick and choose markets that provide the higher value-added return, therefore setting the market price level. The knock of effect will result in certain market sectors not having the ability to compete or in



fact be able to purchase raw material should the domestic market choose to support alternative market sectors within is reduced capacity.

Appendix reference:

15. From your company's perspective are there any other factors that might have negatively affected domestic industry other than the importation of the goods concerned during the POI? If so, please elaborate.

We have nothing else to add other than the remarks and comments already made.

Appendix reference:

16. How much of any increase in price for the goods concerned would you expect to be passed through to the price you pay for them, and to the price for end users in the supply chain?

Based on the measures imposed by the EU, anything between 25 – 45% could be introduced which would effectively cut off the supply option and force the market down the domestic route that is already struggling to maintain demand. Hydro for instance have an annual budget based on their overall capacity, 33,000 tonnes. They have no spare capacity, so how will this gap be fulfilled?? There are no other options, Hydro have not made any UK investment in additional equipment that will bolster capacity for many years.

Appendix reference:

17. Please comment on how any other industries, markets or products could be affected if a trade remedy is or is not implemented on the goods concerned. This could include substitute products or complementary products.

As previously mentioned, clients are already mentioning substitute products should trade remedy and tariffs be introduced.

Appendix reference:

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

Dealing with mainland UK clients only.

Appendix reference:



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

- age,
- disability,
- gender reassignment,
- marriage or civil partnership,
- pregnancy and maternity,
- race,
- religion or belief,
- sex, and
- sexual orientation

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

No comment to make on this area of the questionnaire.

Appendix reference:

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

We have no other additional economic factors that have already been presented based on the structure of our business and relationship with PMUK.

Appendix reference:



SECTION D: Next steps and declaration

Next steps

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

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

Declaration


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

Company name:

26/08/2021

Date


Signature of authorised official


Name and title of authorised official