**Register as a contributor to the case**

**Anti-dumping investigation**

**Case AD0012: Aluminium Extrusions exported from the People’s Republic of China**

|  |  |
| --- | --- |
| **Period of Investigation:** | **01/06/2020 – 31/05/2021** |
|  |  |
| **Injury Period:** | **01/06/2017 – 31/05/2021** |
|  |  |
| **Deadline for response:** | **06 July 2021** |
|  |  |
| **Case Team Contact:** | AD0012@traderemedies.gov.uk |
|  |  |
| **Completed on behalf of:** | GSM ALUMINIUM LTD |

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

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

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

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# **The scope of this investigation**

**Goods Concerned**

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

The goods under investigation are bars, rods, profiles (whether or not hollow), tubes, pipes; unassembled; whether or not prepared for use in structures (e.g. cut to length, drilled, bent, chamfered, threaded); made from aluminium whether or not alloyed, containing not more than 99.3% aluminium.

The product concerned is commonly referred to as ‘aluminium extrusions’, referring to its most common manufacturing process even if it can also be produced by other production processes such as rolling, forging or casting.

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

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

**Like goods**

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

# **Instructions**

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

### I – Why you are being asked to complete this form

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

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

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

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

### II – Who should complete this form

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

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

### III – Deadline for response

A completed form must be submitted to the TRA by no later than **06 July 2021**. If you are unable to provide a completed submission by the given due date and you wish to request an extension, please contact the Case Team at: AD0012@traderemedies.gov.uk.

### IV – Note about confidentiality

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

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

All information provided to the TRA in confidence will be treated accordingly and only used for this investigation (except in limited circumstance as permitted by regulation 46 of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019) and will be stored in protected systems. The non-confidential version of your submission will be placed on the public file, which is available on [www.trade-remedies.service.gov.uk/public/cases](https://traderemedies.sharepoint.com/sites/Investigations-Docs/Submitted%20Applications/Aluminium%20Extrusions%20from%20China/Initiation%20Bundle/www.trade-remedies.service.gov.uk/public/cases).

# **Section A – Your organisation and your interest in the case**

## **A1** **Identity and contact details**

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

|  |  |
| --- | --- |
| Legal name of company: | GSM ALUMINIUM LTD |
| Legal structure (e.g. limited company, sole trader, partnership etc):  | Limited |
| Year of establishment: | 2003 |
| Other operating names: |  |
| Name (point of contact): |  |
| Position: |  |
| Address: |  |
| Telephone No: |  |
| Email: |  |
| Website: |  |

## **A2** **Your organisation’s interest in the case**

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

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

|  |
| --- |
| We are a procurer, supplier and stockholder of bespoke aluminium profiles. These profiles are designed by our UK customers for their exclusive and unique usage. These profiles are extruded by very specific and carefully sourced aluminium extruders. Our suppliers are based in the UK, Europe and rest of the world including China. As a supplier of these goods, we have a unique perspective on pricing levels from various countries in the world and are willing to share this information on a confidential basis. |

Please describe your interest in this case:

|  |
| --- |
| We have an interest in this particular case, as we purchase aluminium extrusions from a UK company which is listed as a direct importer of the goods from China under the commodity code **76109090** and **76042990.** |

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

|  |
| --- |
| Our trading was hampered by the Covid-19 pandemic due to delays from all suppliers, (UK and rest of world) which came about due to factory or deep Port closures/reduced working and uncertain market conditions leading to customer hesitancy. |

# **Section B – Additional information**

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

This may include:

* other parties you believe should receive a questionnaire;
* any initial views you have about the possible existence of a particular market situation in the domestic market of the exporting country or territory such as:
	+ situations/distortions in the domestic market of the exporting country where prices are artificially low;
	+ significant barter trade;
	+ prices reflect non-commercial factors; or
	+ any other reason

which means it is not appropriate to use the comparable price to determine the normal value of the goods concerned;

* the scope of the investigation; or
* anything else you consider relevant.

|  |
| --- |
| Anti-dumping measures would have an immediate and significant impact on the volume of goods entering the UK market from China (currently representing about 20% of the total imported volumes into the UK or 13% of the UK market share) however the level of imports from outside of the UK will increase proportionally from elsewhere outside of the UK because: * The UK aluminium industry is not capable of supplying all sectors of the market. It lacks production capacity but also extrusion press capabilities, the smallest extrusion press in the UK is a 7 inch and the largest a 10 inch in diameter. The UK market requires much smaller or larger extrusion presses to supply the main sectors of activities, such as the building and construction, transport and automotive and engineering markets.
* UK manufacturers are not as supportive of stockists and distributors who tend to embrace global sourcing strategies and are seeing a growth in their businesses.
* The end-result of any punitive measures will cause prices to rise to a target sales price, desired by UK producers (10-15% price rise predicted). These higher prices will eventually be passed on to end-users causing material injuries to thousands of UK SMEs that also re-export their products. It will have its own negative and severe impact on the UK economy. Would it even pass the economic test?

The detrimental financial effect to UK end users would be enormous given the need to re-tool for all bespoke profiles outside of the Chinese Market. There would be a major disruption to lead times as dies are cut and profiles prototyped, leading to subsequent disruptions to UK companies’ supply chain.We have cut tools in China because these products cannot be manufactured in the UK with the same level of quality we require. This is not because of price but a lack of technical ability in the UK as previously mentioned re presses and UK manufacturers’ capabilities. A lot and time and effort would be required to find alternative suppliers to China in the rest of the world causing serious difficulties and financial injuries to SMEs. |

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

|  |  |
| --- | --- |
| Number of UK sites using the goods concerned and/or like goods | 1 |
| Number of employees at UK sites using the goods concerned and/or like goods | Enclosed in confidential information supplied |
| Total production which uses the goods concerned and/or like goods during POI (volume, in metric tonnes) | Enclosed in confidential information supplied |
| Total production which uses the goods concerned and/or like goods during POI (value, in £) | Enclosed in confidential information supplied |
| Name of supplier(s) of the goods concerned and/or like goods | Enclosed in confidential information supplied |

# **Section C – Certification**

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

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

Signature (including e-signature):



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

Name:

Position at organisation:

Date: 1st July 2021