



Pre-Sampling Questionnaire (Producer)
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:	Aluminium Shapes Ltd

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

- Confidential
 Non-Confidential – will be made publicly available

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



Table of Contents

The scope of this investigation	3
Instructions	3
I – Why you are being asked to complete this pre-sampling questionnaire.....	4
II – Who should complete this form	4
III – Deadline for response	4
IV – Note about confidentiality	4
V – Period of Investigation	5
VI – Injury Period.....	5
Section A – Activities of your company and any associated parties	6
A1 – Identity and contact details	6
A2 – Your company’s activities	7
A3 – Associated parties and operational links.....	8
Section B – Production, sales and imports	9
B1 – Production.....	9
B2 – Sales volume and value.....	10
B3 – Imports.....	10
Section C – Additional information.....	11
Section D – Economic Interest Test.....	12
D1 – Upstream Industry (in the UK)	12
D2 – Downstream Industry (in the UK).....	12
Section E – Certification	13



The scope of this investigation

Goods Concerned

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

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

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

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

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

Like goods

This pre-sampling questionnaire asks for information about your company's production and sales of goods which are **like** the goods concerned. Any reference to '**like goods**' in this pre-sampling questionnaire refers to goods produced in the UK or imported to the UK from a country other than the PRC which are like the goods concerned in all respects, or with characteristics closely resembling them.

Instructions

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



I – Why you are being asked to complete this pre-sampling questionnaire

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

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

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

II – Who should complete this form

You should complete this form if you are a **UK producer** of Aluminium Extrusions ('the like good').

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

III – Deadline for response

A completed pre-sampling questionnaire must be submitted to the TRA by no later than **06 July 2021**. If you are unable to provide a completed submission by the given due date and you wish to request an extension, please contact the case team via AD0012@traderemedies.gov.uk.

IV – Note about confidentiality

You will need to submit one confidential version and one non-confidential version of your pre-sampling questionnaire by the due date. Please ensure that each page of information you provide is clearly marked either "Confidential" or "Non-Confidential" in the header. It is your responsibility to ensure that the non-confidential version does not contain any confidential information.

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

All information provided to the TRA in confidence will be treated accordingly and only used for this investigation (except in limited circumstance as permitted by regulation 46 of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019) and will be stored in protected systems. The non-confidential version of your



submission will be placed on the public file, which is available on www.trade-remedies.service.gov.uk/public/cases.

V – Period of Investigation

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

VI – Injury Period

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

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



Section A – Activities of your company and any associated parties

A1 – Identity and contact details

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

Legal name of company:	Aluminium Shapes Ltd
Legal structure (e.g. limited company, sole trader, partnership etc):	Limited Company
Year of establishment:	30
Other operating names:	
Name (point of contact):	Spencer Melia
Position:	Sales Director
Address:	Princewood Road, Corby, Northants NN17 4AP
Telephone No:	01536 262437
Email:	Spencer.melia@alishapes.co.uk
Website:	www.alishapes.co.uk

*(**Please do not fill in the 'Name (point of contact)' or 'Position' sections on your company's **non-confidential version** of this questionnaire**)*



A2 – Your company’s activities

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

- producer of the like goods in the UK
- other (please give details below)

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

Please answer here

Please describe your interest in this case:

We are a UK owned aluminium extruder and as such are interested in the differing price structure that appears to be available for Chinese sources. We find it ever more difficult to compete against imports , specifically Chinese. IT appears that when more processes such as painting or anodising are added in then the price differential becomes higher. More so if the consumer is purchasing machined aluminium components.

Given that the processes are the same and that aluminium in a traded commodity on both the LME and the Shanghai LME we fail to understand why a product being shipped so far can be offered at such a price advantage without any external influences



In the context of the UK Government’s regulations and guidelines associated with the COVID-19 pandemic, please state if this has had any impact on your company’s normal business activity during the POI. If applicable, please provide evidence.

During April 2020 we closed the factory for three weeks due to Covid 19. From then we bought back staff and workers on a steady basis up until August 2020 at which point we were back to full staffing levels. As a UK extruder we felt the need to work with clients during the pandemic and if anything we saw people hoping to relationships with Aluminium Shapes due to difficulties with purchasing.

Like every company we cut our cloth accordingly but we only lost 2 employees due to the effects of Covid 19 on the business. Since March 2021 we have since recruited more people and business is very buoyant

A3 – Associated parties and operational links

Please give details of all associated parties involved in the production and/or sales (export and/or domestic) of the goods concerned or like goods during the POI. Both natural persons (individuals) and legal persons (e.g. companies) are considered to be associated where they meet the definition of ‘Related Persons’ in [regulation 128 of the Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#).

Examples of activities with associated parties could include production, domestic sales, export sales, and/or further processing of goods concerned or like goods.

	Company name	Company location (city, country)	Activities	Relationship
Your company				
Associated Party 1				
Associated Party 2				

+ Add additional rows as required



Section B – Production, sales and imports

B1 – Production

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

	Volume (Metric Tonnes)
Overall production of the like goods during the POI	██████████
Total production capacity of the like goods during the POI	██████████

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

Type of Aluminium Extrusion	Value in GBP (£)	Volume (Metric Tonnes)
Bars and Rods	0	0
Tubes and Pipes – not welded	0	0
Hollow Profiles	██████████	██████████
Solid Profiles	██████████	██████████
Other	██████████	0 – Added value tonnage in figures above



B2 – Sales volume and value

Please provide your UK sales data for the like goods produced in the UK by your company **during the POI and the injury period.**

	Volume (Metric Tonnes)	Value in GBP (£)
Like goods produced and sold in the UK during the POI	██████████	██████████
Like goods produced and sold in the UK during the injury period	██████████	██████████

B3 – Imports

If your company has **also imported** the goods concerned from the People’s Republic of China, or like goods from any other country, and sold them in the UK **during the POI**, provide your sales data for these **imported goods** concerned/ like goods.

	Volume (Metric Tonnes)	Value in GBP (£)
UK sales of the goods concerned, imported from PRC , during the POI	0	0
UK sales of the like goods, imported from countries other than PRC , during the POI	0	0



Section C – Additional information

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

This may include:

- other interested parties you believe should receive a questionnaire and why;
- any initial concerns you have about the possible existence of a particular market situation in the domestic market of the People's Republic of China (the exporting country) such as:
 - situations/distortions in the domestic market of the PRC where prices are artificially low;
 - significant barter trade;
 - prices reflect non-commercial factors; or
 - any other reasonwhich means it is not appropriate to use the comparable price to determine the normal value of the goods concerned;
- any initial concerns you have about the scope of the investigation;
- anything else you consider relevant.

Our major concern is the gap between the UK and China on products that have additional process on them. The supply of mill finish product from China appears to be cheaper than UK but when you add in anodising or painting that gap increases dramatically. The gap widens further when you take into account fabrication such as CNC machining. An example of this is anodising. In the UK & Europe manufacturers calculate costs based on surface area. Ie the area of the section that is to be anodised. In China it is costed per tonne. Therefore a light section that has a large surface area such as a lighting component or heat sink is priced massively different in China to what is considered the norm in UK/Europe

The UK has a healthy stockholder supply chain but these middlemen are able to undercut UK producers by using the Chinese route.

Long term we feel that the UK aluminium market is under threat not only from a price perspective but also a skill set. The traditional manufacturing jobs are simply not there and as generations pass the skills aren't passed down, or of interest or simply not required.

UK capacity has dwindled over the decades due to these cheaper imports. A tariff that is fixed for 5 years will level the playing field but we believe it will also encourage the UK manufacturers to pursue a long term plan to increase capacity, workforce and ultimately market share. The timing of this investigation so soon after Brexit is another positive factor to help bring manufacturing back to the UK



Section D – Economic Interest Test

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

D1 – Upstream Industry (in the UK)


Company Name	Nature of Business	Contact Information
Hydro	UK Billet supplier	██████████ ████████████████████
Barley Chalu	UK Powder Coater & Anodiser	██████████
Alpha Anodising & Finishing	UK Anodising Plant	██████████ ████████████████████

+ Add additional rows as required

D2 – Downstream Industry (in the UK)

Company Name	Nature of Business	Contact Information
Epwin Window Systems	Fenestration	██████████ ████████████████████



Portakabin	Portabel Buildings	
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+ Add additional rows as required



Section E – Certification

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

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

The undersigned certifies that they have the authority to supply the information contained herein on behalf of Aluminium Shapes.

Signature (including e-signature):

X 

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

Name: **Spencer Melia**

Position at company: **Sales Director**

Date: **5/7/21**