

## Anti-Dumping Questionnaire (Producer) Case AD0012: Aluminium Extrusion exported from The People's Republic of China

Period of Investigation (POI):	<input type="text" value="1 June 2020 –31 May 2021"/>
Injury period:	<input type="text" value="1 June 2017 –31 May 2021"/>
Deadline for response:	<input type="text" value="18 August 2021"/>
Contact details:	<input type="text" value="AD0012@traderemedies.gov.uk"/>
Completed on behalf of:	<input type="text" value="Garner Aluminium Extrusions 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](http://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 domestic producers 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](mailto: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* 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 annexes 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 annex by the due date. This is so that we can publish the non-confidential version of your information on our 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](http://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 producer of like goods, they should **also** complete this questionnaire. Please make sure you provide your subsidiaries with access to it.
- Where your subsidiaries or associated companies are not producers but are involved in the sales of 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 visits may be conducted remotely.

Once verification is complete, The TRA will prepare a report and share a draft with you. The TRA 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 **goods** 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

This 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 questionnaire 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.

**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.

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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	<b>S</b> – standard profiles/shapes which can be purchased by any customer, normally shown in a standard catalogue  <b>C</b> – custom/bespoke profiles. The customer owns the copyright/design rights
Shape/Form	X Letter	<b>B</b> - Bars and rods <b>P</b> - Pipes and tubes <b>S</b> – Solid profiles specifically: I,C, T (both with equal and unequal sides), H, U, double U, Z, L (angle), mouldings/ledgers  <b>H</b> - Hollow Shape <b>O</b> – Other
Alloy Series	X Digit	<b>2</b> - 2000 series <b>3</b> - 3000 series <b>4</b> - 4000 series <b>5</b> – 5000 series

		<b>6</b> – 6000 series <b>7</b> – 7000 series <b>8</b> – 8000 series <b>9</b> - Other
Length	X  Letter	<b>S</b> – shorter than or equal to 2 metres <b>M</b> – longer than 2 metres and up to 7 metres <b>L</b> – longer than 7 metres
Weight per metre	X  Digit	<b>0</b> - <0.1 kg/m <b>1</b> – 0.1 kg/m to <0.5 kg/m <b>2</b> – 0.5 kg/m to < 4.5kg/m <b>3</b> - 4.5kg/m to < 8 kg/m <b>4</b> - 8kg/m to < 10 kg/m <b>5</b> - 10kg/m +
Maximum Cross-Sectional Dimension	X  Letter	<b>S</b> – less than or equal to 310mm <b>L</b> – greater than 310 mm
Finish	X  Letter	<b>N</b> - No Finish <b>P</b> - Painted <b>A</b> -Anodised <b>O</b> - Other
Fabrications	X  Letter	<b>N</b> - None <b>Y</b> - Other incl additional cutting, machining, drilling, punching, notching, bending, stretching,
Drawing	X  Letter	Only applies to Bars and Rods (Shape/Form <b>B</b> )  <b>N</b> - Not drawn <b>D</b> - 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 for this investigation shown in the table above. Please include any comments on the PCN structure in the box provided.

Garnalex is happy with the PCN structure

## 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:	Garner Aluminium Extrusions Limited
Legal structure (e.g. limited company, sole trader, partnership etc):	Limited company
Year of establishment:	2018
Other operating names:	Garnalex
Company registration number:	11243043
Place of registration:	UK
Name (point of contact):	
Position:	
Address:	
Telephone No:	
Email:	
Website:	

### A2 About your company

1. Describe the role of your company in the UK market for the like goods (e.g. producer, producer/exporter, producer/importer or producer/distributor).

Producer of trade extrusion products. Producer of own aluminium window & door fenestration products	Appendix reference:
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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

+Add additional rows as required.

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

<i>None</i>	Appendix reference:
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4. Please describe all the other products (not including the goods under review) produced or sold by your company in the UK.

Some of our own products are bought in goods to enable us to sell a full window and door system. We buy in PVCu thermal breaks and hardware which is then re-sold as part of a full system of products.	Appendix reference:
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5. State whether your company is a member of any representative organisations (e.g. trade bodies, associations, Chambers of Commerce).  
If so, provide a copy of the relevant documentation.

Member of Alfed	Appendix reference:
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### 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 explain, or demonstrate in a diagram, the legal structure of your company showing the internal hierarchical and organisational structure, all sites/locations and departments which are involved in the production, sales, R&D, supply and distribution of the like goods for domestic and export markets. Clearly indicate the different production stages carried out by your company.

Note the legal structure is one company; we operate from one site.
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Appendix reference:
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2. Please complete **Annex 1 – Associated companies**.
  - If relevant, 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 each company (e.g. manufacturing, administration, sales).
  - Indicate the shareholdings you have in each company and the shareholdings that each company has in your company.

## A4 Board members and principal shareholders

1. Please complete **Annex 2 – Shareholdings**, providing a list of all your company’s shareholders that owned more than 5% of its shares during the period of investigation (POI), 1st June 2020 –31st May 2021. Where known, provide details of their activities. Also include, for the last five years:
  - your company’s registered capital;
  - the scope of business; and
  - the composition of the Board of Directors and/or shareholders, including their roles and rights.

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.

Board meeting and voting by current members
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Appendix reference:
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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; 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.

See Companies House	Appendix reference:
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## A5 Operational links with other companies or persons

1. 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 like goods, or other licensing, technical patent or compensatory agreements. Include:
- the name and address of the company;
  - 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
N/A			

Appendix reference:

+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	Financial Records & Company Book details

+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
  - the company’s legal form as per section **A2 About your Company**, question 2
  - your accounting practices over the last five financial years,
  - your accounting practices applied to the POI, which differs from your financial statements

Please describe these changes, with reference to any re-statements to your financial accounts including dates and reasons for them.

*Please answer here*

Financial year is 1<sup>st</sup> January to 31<sup>st</sup> December

Changes occurred during 2019 as the original year end of the company was 31<sup>st</sup> March. This change for the period ending 31<sup>st</sup> December 2019.

Financial practices – books and records produced in accordance with UK accounting standards and applicable law (UK Generally Accepted Accounting Practice), including FRS 102 The Financial Reporting Standards applicable in the UK.

Appendix reference:

3. For your company (and any associated parties inside and outside the UK involved in the production, marketing or sales of your goods, R & D, Distribution and or supply of 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;
  - an auditor's opinion on these documents.

*Please answer here*

Audited accounts for the 12-month period ending 31<sup>st</sup> December 2020 see Companies House

Appendix reference:

4. If your accounts are unaudited, please attach a copy of your unaudited financial statements for the injury period 1 June 2017 – 31 May 2021

*Please answer here*

Unaudited accounts for the 12-month period ending 31<sup>st</sup> March 2019  
Unaudited accounts for the 9-month period ending 31<sup>st</sup> December 2019  
See Companies House

Appendix reference:

5. Please attach a copy of your company's trial balance for total organisation and if possible, the profit centre relating to the like goods (in original and spreadsheet form) covering the POI and the most recent financial year. This includes:
- the trial balance which covers the beginning of the financial year to 1 June 2020;
  - 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.

This is confidential information

Appendix reference:

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

This is confidential information

Appendix reference:

7. If your company is part of a group of companies, please also attach a copy of the consolidated accounts of the group for your most recently completed financial year.

N/a

Appendix reference:

8. Please provide a detailed description of your financial accounting system, explaining how sub-ledgers (e.g. costing, debtors, creditors) and other systems (e.g. sales and production) 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;

This is confidential information

Appendix reference:

9. 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;
  - costing methods (for example, by tonnes, units, revenue, activity, direct costs, standard costing etc.) and allocation of costs shared with other goods or processes;
  - your inventory valuation methods for raw material, work-in-process, and finished goods, for example First In First Out (FIFO), (Last in First Out (LIFO), current cost, standard cost or weighted average cost;
  - aging/obsolete inventories, your write-off and/or write-down process(es);
  - valuation methods for scrap, by-products or joint products;
  - valuation methods for damaged or sub-standard goods generated at the various stages of production;
  - 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;



*Please answer here*  
See audited accounts

Appendix reference:

## SECTION B: About your goods

### B1 Understanding your like goods

The goods concerned in this investigation are defined in '[the scope of this investigation](#)'.

We use a PCN number to help us compare the goods concerned and the domestic like goods. When you are completing this section, you must apply the PCN system set out at the link above to describe your goods consistently throughout your responses. If you don't use the PCN table correctly, this could limit the TRA's ability to use the information you provide.

1. How many presses do you have at each of your production sites, and what sizes are they?

*Please answer here*

Garnalex currently have 1 press in Heage, Derbyshire. This press is currently set up as a 9" press but has the power rating and set up to easily switch to 10" with minimal investment. Installation was made in 2019.

Appendix reference:

2. Please categorise the goods that you manufacture in the UK which are like the goods concerned. Indicate the degree of physical likeness, commercial likeness and functional likeness. Please also provide details of your like goods and the goods concerned regarding their production processes, interchangeability, raw materials used, degree of model differentiation, tariff classifications, channels of distribution and sale, pricing and other relevant characteristics.

If your company manufactures a range of like goods, list this information for each individual make and model in the range. If there are differences in characteristics within your range of like goods which cause distinguishable differences in price, explain those differences and the effect they have.

The goods concerned have the same commercial likeness as the goods being produced in the UK by Garnalex. Whether these are standard profiles or custom shapes, they have the same mechanical properties and use the same aluminium specification for the alloys we use.

Appendix reference:

3. Explain the internal coding system your company uses to classify your range of like goods. If your company uses multiple internal reference codes across departments, cross-reference each one. Cross-reference your internal coding system with any sales (invoice codes) made via associated companies.

Technical documentation (such as sales catalogues, safety standards, technical data, etc.) should be attached for each model where available.

This is confidential information
Appendix reference:

4. Please complete **Annex 3 – PCN comparison**, indicating which of your like goods (by make or model) are comparable to each of the goods concerned.

Please substantiate your answers by providing details on any likeness and/or differences you have identified between the goods concerned and the like goods. Attach any evidence you have that is relevant. This could take the form of sales brochures, input costs, research papers or any other relevant documentation.

This is confidential information
Appendix reference:

5. If you have identified differences in **Annex 3 – PCN comparison** between the goods concerned and the goods that you manufacture, please estimate the difference in cost to make and sales price. Explain those differences and the effect they have in the text box below.

Where applicable, this should be on a per unit basis. Describe how you established your estimations and substantiate with evidence where possible.

<i>Please answer here</i> This is confidential information
Appendix reference:

## B2 Understanding the UK market

1. Please explain the end use of the goods concerned and the like goods. If there are multiple uses for the like goods, list them and, where possible, estimate what proportion of your sales goes to each.

The split of the UK market into the following Market sectors is estimated to be as follows:

Building and Construction 60%

Transport and Automotive 20%

Other 20%

This split of our own product sales is confidential information

Appendix reference:

2. Provide a general description of the UK market for the goods concerned and the like goods, including the nature and conditions of competition within the overall market. In your answer please refer to:
  - the nature of competition within the overall market;
  - the degree of price sensitivity;
  - the trends and drivers of demand, including causes of demand fluctuations and any factors contributing to overall market growth or decline;
  - distribution and marketing;
  - general users/consumers/customers;
  - the degree of competition between the goods concerned and the like goods;
  - market segmentation;
  - government regulation or tax;
  - developments in technology affecting the characteristics, demand or the production process of the goods;
  - other commercially significant goods which could be substituted for your goods and the goods <concerned/subject to review> being imported into the UK.
  - any other factors that influence the market (e.g. seasonality).

The market for Aluminium extrusions is growing, with increasing numbers of end users preferring to use the sustainable values that Aluminium brings when compared to other material options.

Appendix reference:

## SECTION C: Costs and production

### C1 Cost to make and sell

1. Complete **Annex 4 – Cost to make and sell**

- Report your total cost to make and sell the like goods domestically.
- Please clearly separate your costs to make (direct manufacturing costs and indirect costs), from your cost to sell (administrative, selling and general expenses (AS&G)).
- All values entered in the table should be totals for the POI by PCN unless otherwise specified in the column title.
- All figures should be reported net of recoverable tax.
- When stating labour costs, please ensure you include all labour costs, directly or indirectly incurred by any activity related to the like good.
- Include revenue (or related value for internal re-use) for any by-products (including aluminium scrap) produced during the production process

Note that headings of each column (e.g. raw materials, energy) can be adapted to suit the naming conventions of your own cost accounting system.

2. Please list, and explain, your labour, manufacturing overheads and AS&G costs for domestically sold like goods. Describe the individual components of these costs and provide detail on how these costs are paid.

This is confidential information

Appendix reference:

3. Please list all inputs (e.g. raw materials, energy, labour) to the production of the like goods. Indicate the source of your inputs and whether they are imported or domestically sourced.

This is confidential information

Appendix reference:

4. If your company is vertically integrated or some of the inputs (e.g. raw materials, energy) used in the production of your like goods are produced by an associated party, provide details of this arrangement and attach documentation demonstrating any agreements you have.





This is confidential information

Appendix reference:

5. If your company incurred any extraordinary costs (such as start-up or ramp up costs) during the POI, please provide details of these costs, explaining why they were extraordinary and how they have been included and amortised/depreciated in your accounts.

This is confidential information

Appendix reference:

6. Please explain how you finance your production of like goods, your sources of finance, whether there is any cost of finance associated with the production of like goods, and how you have reported this in the cost to make figures and company accounts.

This is confidential information

Appendix reference:

7. Please state the cost allocation method used for each PCN for the POI, including an explanation of the allocation under each subheading.

This is confidential information

Appendix reference:

## C2 Cost and sales reconciliation

- In **Annex 5 – Cost reconciliation**, please only fill in the white cells. Insert additional columns or rows as required. Please include reference to the source documents of the inserted data.
  - Please give the total cost of goods made and sold as shown on your audited financial statement of the most recent accounting period.
  - If the POI and your accounting period are different, please enter the difference in cost of goods sold between the periods, as per the management accounts.
  - Please provide your company’s total cost of goods sold over the POI, as shown on your management accounts.
  - Please give the change in finished goods inventory over the POI. This usually relates to the difference between the cost of goods sold and cost of production.
  - Please provide the company’s total cost of production over the POI as shown on your management accounts.
  - You may manufacture other products that are not under consideration. Please provide the cost of production and the production quantity of the other products that are not under consideration over the POI. Please provide the names of each product group that you have determined to be not the goods. Please add more rows if required.
  - For the cells under ‘Cost of production for the goods under consideration’, please enter the total cost of production and production quantity for domestic sales and export.

## C3 Production process

- Please provide a written summary and a diagram/flow chart of your production process for the like goods that you produce in the UK.

This is confidential information
Appendix reference:

- Identify what parts of your production process take place in the UK and explain at what stage the most value is added to your like goods in the production process. Please describe the manufacturing process of the like goods, its level of complexity and the investment of capital involved. If a production process is carried out outside the UK, please explain the nature of the activity and where this process step takes place.

All parts of the extrusion process are conducted at our site in Heage, Derbyshire.
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Appendix reference:

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

Company name	Physical address
Garner Aluminium Extrusions Limited	Firs Works, Spanker Lane, Nether Heage, Derbyshire, DE56 2JJ

Appendix reference:

+Add additional rows as required

## C4 Joint products and by-products

1. Please explain any waste, scrap or by-products related to the production of the like goods. Please explain:
- how you differentiate your waste, scrap and by products;
  - what you do with your waste, scrap and by-products;
  - how any income or cost from waste, scrap or by-products is recorded and allocated across products.
  - the average waste, scrap, and by-product ratio resulting from the production process of the goods subject to review and like goods.

This is confidential information

Appendix reference:

2. If there are joint products please explain how your costs of production (per unit) differ between the like goods and its joint products. Comment on the reason for this difference and explain your method(s) of calculation.

Not applicable

Appendix reference:

## C5 Raw material (RM) and major input purchases

Please complete **Annex 6 – Raw materials and input purchases**, detailing the principal purchases used in the production of the like goods during the POI by your company.

- Please provide a complete breakdown for any inputs that account for more than 5% of the cost to make and sell of your like goods. Please include all purchases and internal transfer costs of these materials used during the POI.
- For each reported purchase/ internal transfer transaction, describe the raw material and its characteristics (e.g. grade, purity).
- If your energy costs constitute more than 1% of your production costs, please also include energy purchases in the annex.
- All figures should be reported net of recoverable tax.

Please provide an invoice and any supporting documents for two of your purchases stated within **Annex 6 – Raw materials and inputs**. Use the box below to give an overview of any supporting documents provided.

<p>The main purchase or raw materials is aluminium, this is in the form of billets</p> <p>Energy costs are the other large costs</p>	<p>Appendix reference:</p>
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## C6 Purchases of like goods and/or goods concerned

1. Complete **Annex 7 – Purchases of like goods** and/or goods concerned. This should include information relating to your company’s total annual purchases of the like goods and/or goods concerned over the injury period. All figures should be reported net of recoverable tax. Please list for each year every country you have purchased from in a separate row.
2. Describe how these purchases fit into your business model. Please attach copies of any agreements or contracts that you have relating to your purchases of like goods and/or goods concerned.

<p>This is confidential information</p>	<p>Appendix reference:</p>
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3. Do you further process the goods concerned or like goods before sale?



This is confidential information

Appendix reference:

## SECTION D: Sales

### D1 – Domestic sales

1. Please complete **Annex 8 – Transaction by transaction (T by T) domestic sales**

- These should include all your domestic sales and returns of the like goods and/or goods concerned for the POI. Include the like goods you have produced, purchased and resold and/or goods concerned that you have purchased and resold.
- Please report returns as negative (-) sales figures.
- Please ensure that you correctly categorise each sale by PCN.
- For transactions or invoices that consist of multiple PCNs, the same invoice number should be referenced. All information in a row should refer to the individual PCN displayed in the first column of that row.
- Where one of the dates requested falls outside of the period of investigation, but another date falls within it, both dates should be provided for the relevant domestic sale transaction.

Please contact the Case Team if you can't provide the relevant information in sufficient detail.

### D2 – Export sales

1. Please complete **Annex 9 – Export sales**.

- These should include all your export sales of like goods for the POI 1st June 2020 –31st May 2021
- Please ensure that you correctly report your total volume and total value for your export sales per PCN.
- All figures should be reported net of recoverable tax.

2. Please provide a list of associated customers who purchase like goods. Explain the nature of the association and any effect it has on the terms of sale to that customer.

This is confidential information
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Appendix reference:
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### D3 Sales reconciliation

1. Please complete the sales reconciliation table in **Annex 10 – Sales reconciliation** starting from the bottom of the table.

Sales revenue and quantity of like goods during POI:

- For your like goods, enter the sales revenue and quantity for domestic and export sales during the POI as reported in Annex 8 and Annex 9.

Sales revenue and quantity of all goods during POI:

- If you produce goods other than the like goods, please provide the sales revenue and quantity of each of these goods during the POI. Please note that the headings (e.g. Sales revenue/quantity of good A during the POI, Sales revenue/quantity of good B during the POI, etc.) should be adapted to reflect the names of the goods.

Total sales revenue/quantity of all goods during the POI as stated in your management accounts:

- Please provide the total sales revenue and total quantity of all your goods during the POI as shown on your management accounts.
- If this figure does not reconcile with the totals of the sales revenue and quantity data below, the table will show a variance. Please use the text box below to provide an explanation for the shown variance.

This is confidential information
Appendix reference:

Difference in total sales revenue of all goods between POI and accounting periods:

- If the POI and your accounting period are different, please enter the difference between the total sales revenue of all goods during the POI and the total sales revenue of all goods during the accounting period as per your management accounts.

Total sales revenue of all goods as per Income Statement

- Please provide the total company sales revenue of all goods as shown on your Income Statement of the accounting period that covers the majority of the POI.
- If this figure does not reconcile with the sum of the total sales revenue of all goods during the accounting period as per your management accounts, the table will show a variance. Please use the text box below to provide an explanation for the shown variance.

This is confidential information
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Appendix reference:

- Please use the text box below to reference any source documentation for the data.

This is confidential information

Appendix reference:

- Additionally, please provide quantitative estimates (e.g. projections or forecasts) for the sales revenue and quantity of like goods and of all other goods you produce on the UK market for the next five years.

## D4 Distribution channels and price setting

1. Attach copies of distributor or agency agreements that you have relating to the sale of like goods.

This is confidential information

Appendix reference:

2. Provide copies of price lists for the like goods for the POI 1st June 2020 –31st May 2021.

This is confidential information

Appendix reference:

3. If any price reductions have been applied to any of your sales of like goods over the POI, please provide a description. This includes discounts, rebates, credit terms, allowances and commissions.
  - Explain the terms and conditions that must be met for any price reduction.
  - Indicate any price reduction not included in an invoice price. Explain how the invoice price and the price reduction have been calculated.
  - If you have issued any credit notes that are not reflected in invoice prices, provide details of the criteria for issuing such notes and the impact that they have on prices (both past and future).

This is confidential information

Appendix reference:



4. Please provide details of your distribution network for like goods, if you have one. Do your sales usually include delivery? How do you calculate delivery costs and prices? Does this vary between customers?

This is confidential information

Appendix reference:

5. Attach sales contracts for the top five customers by volume in **Annex 8 – T by T domestic sales** that you have sold like goods to in the period of investigation.

This is confidential information

Appendix reference:

6. Select examples of domestic sales of like goods to two different customers included in **Annex 8 – T by T domestic sales**. Attach as an appendix a complete set of documentation for these sales. Where possible, include purchase orders, commercial invoices, order acceptances, discounts or rebates, credit and debit notes, contracts of sale, freight and insurance details, bank documentation and all other relevant documents.

This is confidential information

Appendix reference:

## D5 Captive use

7. Complete **Annex 11 – Captive sales and use**. This should include transaction-by-transaction information for the POI 1 June 2020 –31 May 2021, detailing your company’s individual transfers of the finished like good for internal or captive use. You will need to use the [PCN table](#) to categorise each of these transfers by PCN. In the destination column, indicate any transfers for captive use that have not remained on your manufacturing site. In the “use” column, specify how the like goods were used and in the “value” column please assign a market value to the like goods transferred.
1. Please comment on whether your captive use of the like goods has changed over time and what has caused any changes. Please attach evidence to support your answer where required

This is confidential information

Appendix reference:

## SECTION E: Injury to your company

1. Is your company suffering from injury? If so, please describe the nature and degree of the injury. This can relate to the prices, volumes or profits associated with your production and sale of the like goods, or to wider aspects of your business. Please specify and substantiate your claims with evidence. Please estimate the date when the injury began to affect your company. Explain how it has developed since this date.

*Please answer here*

It is difficult to prove the level of Injury caused to Garnalex. As a new start up business then Garnalex cannot provide historical evidence of Injury however the business is attempting to win business, and this will be on a basis of trying to compete with very low-price competition against Chinese imports. And so, the price levels achieved by Garnalex on business that has been won will be impacted negatively by the low-priced Chinese competition.

Furthermore – there is a series of extraordinary events distorting the time period chosen for this investigation:

- Economic recovery after the lockdowns following the Covid pandemic distorting normal trends
- Rapidly increasing demand and cost of raw materials as customers try to source locally sourced material (this is not necessarily going to continue into the future – it is most likely going to be a temporary blip)
- The imposition of EU provisional duties in the mid period of the Pol. This would have caused uncertainty in the market place leading up to the period of time in which the antidumping tariffs were introduced and then also a period of time afterwards as supply chains rebalanced.
- Complexities in the implementation of new import rules after BREXIT – whether it is congestion issues, problems with documentation, driver or container shortages, and a vast quantity of European products impacting supply chains and material flow into UK businesses

Appendix reference:

2. Please estimate the date when the injury began to affect your company. Explain how it has developed since this date  
Injury can relate to the prices, volumes or profits associated with your production and sale of the like goods, or to wider aspects of your business. Please specify and substantiate your claims with evidence.

This is confidential information

Appendix reference:

3. Please provide details if your cost of production of the like goods has changed significantly during the injury period. If so, please explain the cause(s) and, where possible, substantiate with evidence.

This is confidential information

Appendix reference:

4. Please complete **Annex 12 – Injury**. This should be completed in reference to your UK production of the like goods for the injury period. For the following injury factors listed in the annex, please explain in the text box below:
- How you calculated and apportioned your average net operating profit after tax (NOPAT) for the like goods;
  - How you calculated and apportioned your finance costs (e.g. interest) incurred for the like goods;
  - How you assess your stock levels. Please indicate if your stock levels were abnormally high during the injury period. If so, please explain.
  - How you estimated your percentage of market share for the like goods;
  - How you calculated your production capacity and capacity utilisation for the like goods, and the cause of any significant variations;
  - How you set your wages, and the causes of any significant variations; and,
  - How your total employees involved in the UK manufacture of like goods are split across different sites/locations.

This is confidential information

Appendix reference:

5. For your like goods only, please state what level of profit, before tax and as a percentage of turnover, your company would expect to achieve in the absence of injury and explain how you arrived at this figure

This is confidential information

Appendix reference:

6. Explain how you set your current sales price for your like goods. Is this the same as your target sales price? If not, please explain the reasons for this.

This is confidential information

Appendix reference:

7. Complete **Annex 13 – Investments**.

- Please include information relating to all company-wide investments, which includes investments that relate to the like goods, and investments that relate to like goods only
  - The last row should show aggregate investment totals per year
  - For each investment category, indicate the amount of investment. (apportioned, where applicable) and explain what the investment is for.
  - For the investments you have made during the injury period, please also provide the depreciation incurred company-wide and for the like goods.
- Please provide details of your typical source(s) of finance (e.g. loans, debt, share issues, bond issues etc.) for each category of investment relating to your company-wide investments.

This is confidential information

Appendix reference:

8. Please describe any changes in your company's level and trends of returns on investment over the injury period. Please explain the nature and cause of this change and substantiate with supporting evidence e.g. funding proposals, loan approvals or other relevant financial documents

This is confidential information

Appendix reference:

9. Please complete **Annex 14 – Return on fixed assets** related to the production of the like goods.
- Indirectly related assets are used in the upstream process for the production of the like goods. For these assets, please explain in the text box below how you apportion the corresponding values to the production of the like good.
  - If you can't provide information for indirectly related assets, explain the reasons for this. Please describe the effects this has on the level and trend of return of the like goods.

This is confidential information

Appendix reference:

10. Please complete **Annex 15 – Cash flow for the like goods**.

- Ensure the depreciation you state for the POI in this annex matches the figure stated in **Annex 5 – Cost reconciliation**.
- The figures for inventory should relate to the numbers in the section on stocks in **Annex 12 – Injury**.
- If you have an alternative cash flow calculation for the injury period, please attach it and explain how it has been calculated in the box below.

This is confidential information

Appendix reference:

11. Explain any variances between your actual and forecasted budgets over the injury period, with reference to your cash flow statements.

This is confidential information

Appendix reference:

12. Please complete **Annex 16 – Forward sales contracts**. Describe and attach copies of all forward sales contracts/ongoing supply agreements for like goods. Comment on these forward sales 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?

This is confidential information

13. If your company is suffering from injury, please **fully explain** and indicate the degree to which this has been caused by the alleged dumping of the goods concerned. Please also explain and indicate the degree to which any other factors might have caused the injury, for example:

- volume and prices of imports not sold at dumped prices;
- contraction in demand or changes in patterns of consumption;
- restrictive trade practices of, and competition between, third country and UK producers;
- developments in technology; and
- export performance and the productivity of the UK.

Please substantiate your claim(s) with evidence.



This is confidential information

Appendix reference:

14. Has your company experienced an increase in any of the injury factors since the implementation of the EU's definitive determination 2021/546? Please provide any evidence of this

This is confidential information

Appendix reference:

15. Would there be any indirect effects on your industry and/or business if trade remedies are imposed on the goods concerned? In your answer please also comment on the effect of no measures.

We are a growing business with plans to secure further jobs within the UK and ensure demand for extrusion can be met locally.  
We strongly believe that further investment decisions could be put on hold and current investment would be negatively impacted, pending the impact of no trade remedy being in place,  
Finally, goods coming in from China are clearly more environmentally damaging versus local sourcing.

Appendix reference:

## SECTION F: Dumping

Please note that all questions in this section are optional. If you choose not to provide information to a question in this section, please state this or write 'N/A' in the respective text box.

### F1 Dumping

1. Do you have any information about the normal value of the goods concerned in The People's Republic of China? The normal value is the market price for aluminium extrusions in the People's Republic of China. Please substantiate with evidence where possible. This may include sales catalogues, price lists, invoices, quotes, market intelligence or sales correspondence, or any other documentation relating to the domestic price of the goods concerned in The People's Republic of China.

This is confidential information

Appendix reference:

2. Do you have any information about the export price to the UK of the goods concerned from The People's Republic of China? Please substantiate with evidence where possible. This may include sales catalogues, price lists, invoices, quotes or sales correspondence, or any other relevant documentation relating to the export price to the UK of the goods concerned from The People's Republic of China.

*Please answer here*

Garnalex are not in a position to reliably confirm the export price from China – the best source of data would be trade statistics

Appendix reference:

### F2 Adjustments

1. If you are aware of any factors that could mean costs or profits of the goods concerned are not substantially determined by market forces, please provide details and any supporting evidence.



*Please answer here*

There have been many reports conducted the European Commission, European Aluminium and from OECD which puts into question the role of China's influence in the Aluminium sector. As the largest Aluminium producer in the world – selling their capacity is their primary focus and it is clear they are incentivised to do so financially

The fact that the USA, Australia, Canada and now the European Union (initially conducted including the UK as one of its member states) have all investigated and concluded that dumping practises have occurred surely gives an indication that a free and fair playing field will not be found in the UK either.

Government intervention on rebates offered is one of many ways that the Government will influence exporters to be able to offer profiles at a price that is targeted at undercutting UK producers as it appears to be without any additional costs for conversion.

Appendix reference:

### F3 Particular market situation

1. Are you aware of any government policies, laws or directives in China, or other planning documents, that have benefitted producers of aluminium extrusions during the injury period. This includes government policies at a Provincial/City level, as well as at state level. Please provide copies of these policies.

*Please answer here*

Garnalex are not in a position to comment on this

Appendix reference:



## SECTION G: Supplementary questions

### G1 Economic interest

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.

1. Please provide an overview of your supply chain for the like goods, from raw materials through to final customers. Where possible, please describe the number, location and size of UK producers at each stage.

This is confidential information
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Appendix reference:
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2. Please provide total annual employment figures in FTE (full-time equivalents) for the injury period for all your company's business activities relating to production of the like goods. Where possible, provide sub-totals for each of your company's sites or facilities. Please indicate how these employment figures 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.

This is confidential information
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Appendix reference:

3. Please provide total annual median employment figures for all your company's sites involved in the production of the like goods during the injury period. If you are unable to provide median figures, please provide mean figures. How would these figures 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 the next five years (e.g. projections or forecasts) and explain the assumptions made.

This is confidential information

Appendix reference:

4. 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 future years and explain the method used to calculate them.

Unknown

Appendix reference:

5. Please comment on how significant production of the like goods is in relation to your company's entire UK production. Within your response, please state the share of total production value represented by the like goods during the POI.

This is confidential information

Appendix reference:

6. For the like goods and/or goods concerned, please state (by value) the proportion of your total sales that was exported during the POI.

This is confidential information

Appendix reference:

7. Please indicate who the consumers of the like goods are, which industry and level of trade they relate to and whether they are companies or private individuals. Are the like goods considered to be an intermediate and/or final good?

This is confidential information

Appendix reference:

8. Please comment on how any other industries, markets or products could be affected if a trade remedy is (not) implemented on the goods concerned. This could include substitute products (such as margarine for butter) or complementary products (such as printers and ink).

Substitution products such as steel, copper or plastic are unlikely to benefit much as the materials themselves do not share the same properties that aluminium does and so if this is important then industry will simply re-source from outside the UK in the event of a decline in UK manufacturing capacity and capability.

Appendix reference:

9. Please describe how you would expect the implementation and non-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.

This is confidential information

Appendix reference:

10. Do you know of any related industries that might be affected by (non) implementation of a trade remedy?

Please consider in particular:

- upstream industries – those who produce inputs needed for the like goods or goods concerned
- downstream industries – those who purchase the like goods or goods concerned.

This is confidential information

Appendix reference:

11. To what extent would you expect any changes in prices for the goods concerned or like goods to be passed onto final consumers?

This is confidential information

Appendix reference:



12. 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 claims with evidence.

This is confidential information

Appendix reference:

13. As a public body, TRID 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.

If you have any information that could assist us in our consideration of whether the imposition of an antidumping measure might disproportionately affect any of these groups, please provide it in the box below.

This case should not disproportionately impact on any of these groups.

Appendix reference:

14. Please explain how imposing a trade remedy measure could affect the following aspects of the competitive market environment and structure for the like goods and goods concerned in the UK:

- the range of suppliers of this type of goods in the UK;
- the ability of suppliers to compete in this market;
- the incentives for suppliers to compete vigorously;
- consumer choices and availability of information.

Please provide evidence to support your answer.

The introduction of an antidumping tariff would simply support free and fair trade across the Aluminium sector. The Chinese imports, at significantly lower prices to both UK producers and European or wider global imports, has a disruptive impact on the market price for aluminium extrusion and the buying habits of procurement specialists who become obsessed with hitting the lowest price (whether Imported or Produced locally).

Appendix reference:

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

This is confidential information

Appendix reference:

16. 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 and any supporting evidence.

The TRA must consider not only the level of Injury that has been seen in the Industry of the last 20 years, but also the potential damage that will be caused by not introducing Anti-Dumping tariffs to protect UK producers from the threat posed by a further increase (perhaps doubling) of the amount of Chinese supplied Extrusions into the UK market that was previously sold into the European Union Member states.

Appendix reference:

## SECTION H: 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](http://www.trade-remedies.service.gov.uk)) by **18 August 2021**. The checklist in Section I 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 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: Garner Aluminium Extrusions Limited

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Date

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Signature of authorised official

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Name and title of authorised official





