**Pre-Sampling Questionnaire (Exporter)**

**Subsidy investigation**

**Case AS0020 Ironing Boards exported from the Republic of Turkey**

|  |  |
| --- | --- |
| **Period of Investigation:** | **1 January 2021 – 31 December 2021** |
|  |  |
| **Injury Period:** | **1 January 2018 – 31 December 2021** |
|  |  |
| **Deadline for response:** | **26 April 2022** |
|  |  |
| **Case Team Contact:** | **AS0020@traderemedies.gov.uk** |
|  |  |
| **Completed on behalf of:** | MILENYUM METAL DIŞ TİCARET VE SANAYİ ANONİM ŞİRKETİ |
|  |  |

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

**☐** Confidential

**[X]** 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 **26 April 2022**.

Table of Contents

[The scope of this investigation 3](#_Toc99356394)

[Product control numbers 3](#_Toc99356395)

[Instructions 6](#_Toc99356396)

[I - Why you are being asked to complete this pre-sampling questionnaire 6](#_Toc99356397)

[II – Who should complete this form 6](#_Toc99356398)

[III – Deadline for response 7](#_Toc99356399)

[IV – Note about confidentiality 7](#_Toc99356400)

[V – Period of Investigation 7](#_Toc99356401)

[VI – Injury Period 7](#_Toc99356402)

[Section A – Activities of your company and any associated parties 8](#_Toc99356403)

[A1 – Your company’s activities 8](#_Toc99356404)

[A2 – Associated parties and operational links 9](#_Toc99356405)

[Section B – Production and sales volumes 10](#_Toc99356406)

[B1 – Production 10](#_Toc99356407)

[B2 – Sales volume and value 10](#_Toc99356408)

[Section C – Individual Countervailing Amount 11](#_Toc99356409)

 [Section D - Subsidies 12](#_Toc99356410)

[Section E – Additional information 14](#_Toc99356411)

## The scope of this investigation

**Goods concerned**

This **investigation** covers **ironing boards** exported from the **Republic of** **Turkey** (**Turkey**), described as:

Ironing boards made from iron or steel, whether or not free standing, with or without a steam soaking and/or heating top and/or blowing top, including sleeve boards, and essential parts thereof, i.e. the legs, the top and the iron rest.

These **goods** are currently classifiable within the following commodity code(s):

7323 93 00 10

7323 99 00 10

8516 79 70 10

8516 90 00 51

These commodity codes are only given for information.

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**

In addition to seeking information about your company’s export sales to the UK of the **goods** **concerned**, this pre-sampling questionnaire will also ask about your sales of **like goods** in your domestic market a nd to third countries. Any reference to ‘**like goods’** in this questionnaire refers to goods which are like the **goods** **concerned** in all respects, or with characteristics closely resembling them.

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

**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 formof 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.

|  |  |  |
| --- | --- | --- |
| **Category** | **Sub-category Format** | **Explanation** |
| Ironing board type  | S | Sleeve board |
|  | T | Tabletop board  |
|  | N | Standard ironing board (other than ‘S’, ‘T’ and ‘L’) |
|  | L | Pro ironing board (ironing board with steam soaking and/or heating and blowing top) |
| Top length | 1 | less than 115 cm (< 115) |
|  | 2 | from 115 cm to 125 cm (≥ 115 ≤ 125) |
|  | 3 | more than 125 cm (> 125) |
| Top construction/material  | M | Mesh steel |
|  | S | Solid steel |
|  | O | Other |
| Legs construction  | 1 | Standard ironing board without legs or tabletop board or sleeve board |
|  | 2 | Standard or pro ironing board with T legs |
|  | 3 | Standard or pro ironing board with 3 legs |
|  | 4 | Standard or pro ironing board with 4 legs |
|  | 5 | Standard or pro ironing board with U legs |
| Cover and pad | S | Standard cotton and/or polyester cover without pad or with foam pad |
|  | M | Metalized cover with foam or felt pad or cover with felt pad |
| Iron rest | 0 | Not present  |
|  | 1 | Steel wire |
|  | 2 | Pressed steel or other solid iron rest (whether or not removable, with or without hanger rack or cord minder etc.) |
|  | 3 | Combination iron / steam generator rest |
| Accessories | 0 | No accessories |
|  | 1 | With accessories (e.g. sleeve board, linen rack and socket with extension with or without cord minder) |

Example of the PCN:

Ironing board of 97 x 34cm made from mesh steel and covered by fabric with an iron rest as well as T legs will have the following PCN:

**N1M2S20**

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.

|  |
| --- |
| We consider that the PCN structure for this investigation shown in the table above should include the following product characteristics. Milenyum Metal produces ironing boards with a plastic rest, among others.Iron rest category should include “plastic.” |

## Instructions

The Trade Remedies Authority (TRA) is responsible for investigating the allegation that the production and/or export of **ironing boards** from **Turkey** to the United Kingdom (UK) has been subsidised and that this subsidisation is causing injury to the UK industry.

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

We are seeking your cooperation as an **overseas exporter** to identify whether **the alleged exports were subsidised** and **have** 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 overseas exporters of the **goods concerned** from **Turkey** 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 in relation to 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).

If you are sampled for further investigation, we will provide you with a further detailed questionnaire. By submitting a completed detailed questionnaire response, you might become eligible for an individual **countervailing amount**, if we are recommending that measures **apply** following this **investigation**. Please refer to [Section C](#_Section_C_–) for more information on individual **countervailing** amounts.

If you do not complete this pre-sampling questionnaire or the detailed questionnaire, you could be found to be non-cooperating. For more details on how this may affect you, please consult our [operational guidance on non-cooperation.](https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#non-cooperation)

### II – Who should complete this form

You should complete this form if you are an **overseas exporter** of **ironing boards** exported from **Turkey** (**‘the goods concerned’**).

If you are not an **overseas exporter**, 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**26 April 2022**. If you are unable to provide a completed submission by the given due date and you wish to request an extension, please contact **Maria Lopez, AS0020@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#confidential-information-and-non-confidential-summaries](https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.gov.uk%2Fgovernment%2Fpublications%2Fthe-uk-trade-remedies-investigations-process%2Fan-introduction-to-our-investigations-process%23confidential-information-and-non-confidential-summaries&data=04|01||483a84c73b3d4fb9670308da1163bc31|6d05c46229564ec4a0d4480181c849f9|0|0|637841417292025267|Unknown|TWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D|3000&sdata=MeLo26niqWoXAYq%2FKdgGTVCc1VefVvvYt9zI20rI1Zc%3D&reserved=0) 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](http://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: **1 January 2021 to 31 December 2021**.

### VI – Injury Period

The Injury Period referred to in this pre-sampling questionnaire is: **1 January 2018 to 31 December 2021**

## Section A – Activities of your company and any associated parties

### A1 – Your company’s activities

To determine your company’s role for the purpose of this **investigation**, please select the activity/activities of your company below. For a definition of **goods concerned** please refer to above section *'*[*the scope of this investigation’.*](#_The_scope_of)

**X** overseas exporter of the **goods concerned**

☐ other (please give details below)

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

*Please answer here*

Non applicable, our company is an overseas producer and exporter of the goods concerned.

Please describe your interest in this case:

*Please answer here*

Our company is one of the leading exporters of ironing boards to the United Kingdom in the POI from Turkey. We are ready to cooperate fully with the TRA in this investigation and expect to be included among the sampled companies. We believe that Milenyum Metal A.Ş. is the largest exporter of ironing boards from Turkey to the UK. Our company has been exporting ironing boards to the UK starting from 2009.

### A2 – 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*.](http://www.legislation.gov.uk/uksi/2018/1248/regulation/128/made)

Examples of activities could include manufacturing, exporting, purchasing, warehousing, sales (domestic), sales (export), further processing of the **goods concerned** or **like goods**.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **Company name** | **Company location****(city, country)** | **Activities** | **Relationship** |
| Your company | *Milenyum Metal Dış Tic. ve San. A.Ş.* | Kayseri, Turkey | Production and sales of ironing boards, cloth dryer, bunk beds, metal beds, replacement covers, luggage rags, accessories. | *Shareholders:**[Sensitive] (34%)**[Sensitive] (16%)**[Sensitive]**(11 %)* *[Sensitive] (7%)**[Sensitive] (7%)**[Sensitive] (25%)* |
| Associated Party 1 | *Muhico İç ve Dış Ticaret Ltd. Şti.* | Kayseri, Turkey | Production of comfort mats. Domestic sales of comfort mats, ironing boards, bunk mats, metal beds. | Common shareholders.*Shareholders*:*[Sensitive] (49%), [Sensitive] (51%)*  |
| Associated Party 2 | *3M Plastik ve Metal Dış Tic. ve San. A.Ş.* | Kayseri, Turkey | Export sales of ironing boards, comfort mats cloth dryer, bunk beds, metal beds, replacement covers, accessories, shoe rags, luggage rags, paella pans, plastic laundries. | *Common shareholder.**Shareholders*:*[Sensitive] (50%), [Sensitive] (50%)*  |
| Associated Party 3 | *Mabel Home LLC* | New Jersey,USA | Importer of ironing boards, comfort mats, cloth dryer, bunk beds, metal beds, replacement covers, accessories, shoe rags, luggage rags, paella pans, plastic laundries. | *Common shareholder.**Shareholders*:*[Sensitive] (50%), [Sensitive] (50%)*  |
| Associated Party 4 | *Mabel Home LTD* | New Haven,United Kingdom | Importer of ironing boards, comfort mats, cloth dryer, bunk beds, metal beds, replacement covers, accessories, shoe rags, luggage rags, paella pans, plastic laundries. | *Common shareholder.**[Sensitive] (100%)* |

+ Add additional rows as required

## Section B – Production and sales volumes

### B1 – Production

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

|  |  |
| --- | --- |
|  | **Volume****(units)** |
| Overall production of the **goods concerned** and **like goods** during the POI | 1.110.000 – 1.300.000 |
| Total production capacity of the **goods concerned** and **like goods** during the POI  | 1.100.000 – 1.250.000 |

### B2 – Sales volume and value

Please provide the total sales volumes and sales price values in the table below.

|  |  |  |
| --- | --- | --- |
|  | **Volume****(units)** | **Value in****in GBP (£)** |
| Total export sales of the **goods concerned** to the UK in the POI **manufactured** by your company | 320.000 – 355.000 | 1.900.000 – 2.150.000 |
| Total export sales of the **goods concerned** to the UK in the POI **not** **manufactured** by your company | 0 | 0 |
| Total domestic sales of **like goods**in the POI **manufactured** by your company | 140 – 155 | 900 – 1.040  |
| Total domestic sales of **like goods** in the POI **not** **manufactured** by your company | 0 | 0 |

(\*) Figures ranged +/- 10% in sections B1 and B2.

## Section C – Individual Countervailing Amount

If the TRA decides to sample overseas exporters, and you are **not** selected for this sample, please indicate whether you would like to complete the detailed questionnaire.

By submitting a completed detailed questionnaire response, you might become eligible for an individual **countervailing amount**, if we recommend **applying** measures following this **investigation**.

**X** - Yes

☐ - No

If you are **not** selected for this sample and you then do **not** choose to complete a detailed questionnaire, you will not be eligible for an individual **countervailing amount**. Your **countervailing amount** will be determined based on the amounts imposed on the overseas exporters in the sample.

**Please note**:

If we recommend that a trade remedy measure **applies** following this **investigation,** and you have requested an individual **countervailing amount,** please note that you will be required to supply the necessary information within the given timeframe for us to calculate this for you.

The TRA must accept an overseas exporter’s request for an individual **countervailing amount** and calculate an individual amount, providing that:

* the information required is complete and submitted on time; and
* the number of requests for individual calculations does not unduly burden the **investigation** and risk delaying its conclusion.

**Section D - Subsidies**

The alleged subsidy programmes being investigated are listed in the table below. Please use this section of the questionnaire to provide any information you have on the programmes listed. You can also provide information on any other subsidy programmes that you believe relate to the production and/or sale of the **goods concerned**.

**Subsidy programmes**

|  |  |  |
| --- | --- | --- |
| **No.** | **Subsidy name** | **Subsidy type** |
| 1  |  Turkish Free Zone | Preferential tax programme (income, corporate and property tax exemptions) |
|  |   | Provision of intermediary and raw materials at less than adequate remuneration |

+Add/remove additional rows as required.

* + - 1. Do you have any information about the alleged subsidiesidentified in the table above that were received or provided a benefit in **Turkey** during the POI? Where possible, please substantiate your answers with evidence, including details of:
* the foreign authority responsible for providing the alleged subsidy,
* conditions of eligibility for receipt of the alleged subsidy,
* all known recipients of the alleged subsidy,
* the amount of the alleged subsidy,
* when the alleged subsidy programme commenced,
* frequency of alleged subsidy i.e. one-off or re-occurring; and,
* the effect of the alleged subsidy on the production and sales of the **goods concerned**.

|  |
| --- |
| *Please answer here*We benefited from preferential tax programme (income, corporate and property tax exemptions), since our company is located in Kayseri Free Zone. Eligibility is automatic for companies operating in Kayseri Free Zone. We do not have accurate information concerning the date when the alleged subsidy programme commenced or recipients of the alleged subsidy. Alleged subsidy has or had no significant effect on the production and sales of the goods concerned. |

* + - 1. If you are aware of any other assistance programmes not previously addressed, that you benefited from during the period of investigation and/or during the injury period, please identify those programmes below:

|  |  |  |
| --- | --- | --- |
| **No.** | **Subsidy name** | **Subsidy type** |
| 1 | Foreign fair support program | Export subsidy |
| 2 | Eximbank loans | Export subsidy |
| 3 | [Redacted] | Domestic Subsidy |

+Add/remove additional rows as required.

For each programme identified above, please answer the following.

* the foreign authority responsible for providing the subsidy,
* conditions of eligibility for receipt of the subsidy,
* all known recipients of the subsidy,
* the amount of the subsidy (with particular reference to the period of investigation),
* when the subsidy programme commenced,
* frequency of subsidy i.e. one-off or re-occurring; and,
* the effect of the subsidy on the production and sales of the **goods concerned**.

|  |
| --- |
| *Please answer here*Foreign fair support program is provided by Trade Ministry of Turkey. [Redacted] and Eximbank loans are provided by Turkish Eximbank. Exporting companies are eligible for foreign fair supports and Eximbank supports. [Redacted. This program may not be countervailable]. Such subsidies had no significant effect on the production and sales of the goods concerned. We do not have accurate information concerning the date when the alleged subsidy programmes commenced or recipients of the alleged subsidy. |

## Section E – 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;
* the scope of the investigation; or
* anything else you consider relevant.

*Please answer here*

Customs codes that are provided in the initiation notice do not correspond to the customs codes that we used to export ironing boards. Milenyum Metal exported ironing boards only under the following customs code: 7323.99.00.00.00.

We consider that imports of ironing boards from Turkey to the UK are not significant compared to other exporting countries.

Domestic producer is not able to satisfy market demand in the UK, therefore CV duties are not in the interest of the UK.

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**.

Names and contact information of some of the UK-based companies operating downstream of our business in the supply chain for the like goods are provided below:

[Redacted – Commercially Sensitive Information]

[Redacted – Commercially Sensitive Information]

[Redacted – Commercially Sensitive Information]

[Redacted – Commercially Sensitive Information]

[Redacted – Commercially Sensitive Information]