

# Trade Remedies Authority

## Anti-dumping and Subsidy Investigations: Application form

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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)).

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# Instructions

## About us

The Trade Remedies Authority (TRA) is an arm length body of the UK's Department for International Trade. It carries out trade remedies investigations to find out if a new trade measure may be needed to counter dumped or subsidised imports or a sudden surge in imports.

The legislative framework that the TRA operates under is found in the [Taxation \(Cross-border Trade\) Act 2018](#) ('the Act') and the [Trade Remedies \(Dumping and Subsidisation\) \(EU Exit\) Regulations 2019](#) ('the Regulations').

## About you

You can apply to us to open an investigation if you are a UK producer of goods or a representative of a UK producer and you have evidence of unfair trade practices relating to the dumping or subsidy of goods imported into the UK.

You must provide sufficient evidence of dumped or subsidised goods being imported in the UK and that the dumped or subsidised imports have caused or are causing injury to the UK industry (in compliance with the Act)

You can find out more about our remit and how we work by reading our guidance on [trade remedies investigations](#).

## About this form

Complete this form and the relevant annexes if you want to apply for a new anti-dumping or subsidy investigation. This form will give us the information we need to decide whether to initiate an investigation into your concerns. You can find more information on how we [assess applications](#) in our guidance.

You must submit your application online through the Trade Remedies Service (<https://www.trade-remedies.service.gov.uk>). When you submit your application, you must also submit a non-confidential version (including the annexes) which doesn't contain any data you think is sensitive (for instance, commercial data about your company), as we are required to publish a copy of the application form. You can find out more about [what can be considered confidential and how to prepare a non-confidential version of your documents](#) in our guidance.

If you are considering submitting an application and would like to discuss it with someone first, please email [contact@traderemedies.gov.uk](mailto:contact@traderemedies.gov.uk). You can find more on completing this application in our [Pre-Application Office](#) and [application assessment](#) guidance.

If you have any issues or queries about using the Trade Remedies Service, please email [help@traderemedies.gov.uk](mailto:help@traderemedies.gov.uk).

## What happens next

Once you have completed this application form you can share a confidential version with the Pre-Application Office to get feedback before you formally submit your application. When you formally submit your application, you will need to submit a confidential and a non-confidential version of this form. Please upload these through our Trade Remedies Service at [www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk).

Once you have done this:

- you will receive an email confirming the documents have been uploaded successfully;
- the assessor(s) of your application will contact you if further information is required; and
- the assessor(s) of your application may contact you to arrange a visit to verify the information contained in your responses.

## How to complete this application form

Please read and follow all the instructions carefully. You will need to provide evidence to support your concerns. You may need to attach supporting documents in appendices to supplement the answers you give.

Please also note the following points:

- Try to avoid leaving any questions blank. If the question isn't relevant to you, please try to explain why.
- If the answer to a question is "zero", "no", "none" or "not applicable", please write this rather than leaving the answer blank.
- If you feel you can't present the information as requested, please contact the Pre-Application Office by emailing [contact@traderemedies.gov.uk](mailto:contact@traderemedies.gov.uk).
- If there is not enough space in any part of the application form to provide a full answer, please attach 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.
- If you include any documents not in English, please provide an English translation.
- Provide all dates in the format DD/MM/YYYY (e.g. 23/05/2019).

- 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).
- Limit all sales/currency/income figures to two decimal places and use the appropriate currency symbol (e.g. £1,300.00).
- All figures should be reported net of tax unless otherwise stated.
- For definitions of the incoterms used throughout this document, please visit the [International Chamber of Commerce](#).

## About The Goods

This section of the application form is about the imported goods you want us to investigate. These imported goods will be referred simply to as ‘the goods’.

You can only ask us to investigate imported goods if you (or the industry you represent) produce ‘like goods’. Like goods are defined as goods which are similar to the goods under investigation in all respects or have characteristics which closely resemble them. When we decide what are like goods, we will consider the following non-exhaustive list of criteria:

- physical likeness, such as physical characteristics
- commercial likeness, including competition and distribution channels
- functional likeness, such as end-use or if the goods can be substituted for each other
- similarities in production, such as method and inputs
- other relevant characteristics

## The Imported Goods

1. Describe the imported goods you are concerned about (if possible, please attach digital versions of images, brochures, catalogues, etc which show the goods in question).

*The goods we are concerned about are ironing boards, whether or not free-standing, with or without a steam soaking and/or heating top and/or blowing top, including sleeve boards and the essential parts thereof i.e. the legs, the top, and the iron rest. The basic product type consists of steel legs, a steel top, an iron rest and a textile cover. The concern also includes the import of the component parts; legs, top and iron rest. The primary use of all product types is the ironing of clothes.*

*Ironing boards are produced in a number of different sizes and designs that reflect the requirements of the consumer be it cost or quality. In most cases the size of the ironing boards in the UK market is based on the UK manufacturers products. Annexes C1.1, 1.2 & 1.3, & O & G contains commercially confidential information from a source in Turkey and includes imported product details. They are confidential on behalf of the applicant and the Turkish source as to reveal this would reveal confidential information to third parties and competitors which could compromise the ongoing business relationship with the Turkish source. To reveal this information further would damage ongoing business relationships with the parties.*

*An illustration of the imported boards can be seen on Annex C2 .*

*The imported goods are functionally identical to those produced in the UK and targeted at the same consumer. Ironing boards are found in a market segment of laundry products. Details of this segment are discussed in section 5 of the Comparability between the Goods section*

Appendix reference:

2. Explain where the imported goods you are concerned about are being exported from.

*The goods are being exported from Turkey*

Appendix reference:

3. Provide the tariff classification(s) for the imported goods.

*7323 93 00 10 ; 7323 99 00 10 ; 8516 79 70 10 ; 8516 90 00 51*

Appendix reference:

4. Give details regarding whether the imported goods are currently subject to any anti-dumping/countervailing/safeguard measures or ongoing investigations in other countries.

*Similar goods from China are subject to Anti-dumping duty on imports of ironing boards originating in the Peoples Republic of China EU Regulation 2019/1662.*

*The Applicant notes that the publication of the decision on the EU regulation 2019/1662 included a statement in 3.3.1 (152) “the EU is an attractive market for Chinese exports “ and in 3.3.1 (153) “that the repeal of the anti-dumping measures would result in a continuation of dumping”.*

Appendix reference:

## The Like Goods

1. Describe the like goods produced by the UK industry (if possible, attach digital versions of images, brochures, catalogues, etc).

*The goods produced by the UK industry are ironing boards. The basic product type consists of steel legs, a steel top, an iron rest and a textile cover. The primary use of all product types is the ironing of clothes.*

*The ironing boards can have different sizes of tops ranging from 97cm x 33cm to 122cm x 43cm. The length and design of the steel legs will largely depend on the*

*size of the top so that the board is stable. The iron rests come in a variety of shapes and design such as oval or rectangle with holes in or without.*

*Annex I included an extract from the UK manufacturers private catalogue it is confidential as it contains sensitive company specific marketing details not in the public domain and would reveal information that could be used adversely to compete against it .*

*It would also compromise existing business relationships.*

*This Annex cannot be redacted or summarised as to do so would render the open annex meaningless.*

*Comparisons between the Turkish and UK manufacturers board can be seen on Annex C2*

*Annex K has been partly redacted in places but illustrates the different designs of boards, rests and legs*

Appendix reference: I, K

## Comparability between the Goods

1. Explain how the like goods produced by the UK industry are like the imported goods. Please cover the following aspects of the goods.

The physical, technical, chemical and any other characteristics that describe the goods – explain any differences:

*The ironing boards produced for export from Turkey and the ironing boards produced and sold by the UK manufacturer in the UK market have the same basic physical and technical characteristics and the same basic uses. The boards manufactured in Turkey are often a copy of the UK Manufacturers as can be seen in Annex K.*

Appendix reference: K

2. If the goods can be subdivided into separate models – provide details about each of the models, such as their product literature and technical documentation:

*There are a number of different models on the market, representing a wide variety of sizes and styles, some with unique features such as the iron rests and the height mechanisms. [Annex I is confidential as it included an extract from the UK manufacturers private catalogue it is confidential as it contains sensitive company specific marketing details not in the public domain and would reveal information that could be used adversely to compete against it .*



*It would also compromise existing business relationships.*

*This Annex cannot be redacted or summarised as to do so would render the open annex meaningless.*

Appendix reference: I

3. Give the tariff classification of the goods (customs commodity code) – if there are multiple models, provide the customs commodity code for each model:

*The tariff classification codes are the same as the above (point 3 of 'The Imported Goods' section) for all the models.*

Appendix reference:

4. Summarise the production process of the goods in the UK and in the exporting country/countries. Make sure you explain if there are different production processes within the UK and/or the exporting country/countries concerned:

*Stage One - Top Manufacture:*

*Mild steel coil or plates are perforated (if perforated top), flattened and cut into sheets. Sheets are cut to shape of the ironing board top.*

*Stage Two - Rim*

*Mild steel strip is formed (by roll forming) into a rim the shape of the ironing board. Cut sheets from stage one are inserted into/onto the rim and attached using a combination of resistance welding and pressure*

*Stage Three – Profiles*

*Mild steel profiles are then welded onto the underside of the top to strengthen the structure and allow for the fixing of the legs*

*Stage Four – Rest*

*Plates of mild steel are pressed into iron rest shapes. Fixing wires are welded onto these shapes to facilitate subsequent attachment to the top. The iron rest is welded onto the top.*

*Stage Five - Leg Manufacture*

*Pre-cut lengths of mild steel tube are formed by a combination of pressing and welding into single or double leg configurations*

*Stage Six - Height Levers*

*Mild steel wires are formed into height levers by bending*

*Stage Seven - Assembly*

*The tops and legs are assembled*

*Stage Eight - Painting*

*The product is automatically pre-treated with a rust inhibitor; coated using epoxide resin and baked to fix the powder into place.*

*Stage Nine - Feet*

*Plastic material is moulded into the shapes of the feet*

*Stage Ten – Dressing*

*The Boards are “dressed” with a fabric and foam/felt cover. Ancillary wire, plastic, rubber and electrical components are then added as required*

*Stage Eleven - Packing*

*The ironing boards have a paper insert placed on them. The board is then automatically wrapped in plastic and labelled.*

*The detailed manufacturing processes at these stages in the UK is considered confidential information.*

Appendix reference:

5. Provide a general description of the UK market for the goods including the nature and conditions of competition within the overall market. In your answer please refer to:
- general users/consumers/customers;
  - market segmentation;
  - government regulation or tax;
  - distribution and marketing (for example, how is the product sold and is quality or price the deciding factor);
  - 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;
  - 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 being imported into the UK; and

- any other factors that influence the market.

*[The original document included the applicants assessment and knowledge relating to the UK market. This knowledge has been built up and refined over a number of years and is confidential. The information can't be redacted or summarised because the information can't be redacted without compromising commercially sensitive data.]*

Appendix reference:

6. We give goods in our investigations Product Control Numbers (PCNs) which are identifiers unique to our work and are created on the basis of the main characteristics differentiating the goods from other goods. We use PCNs to allow comparison between products made by domestic and foreign producers. The accuracy of the TRA's PCN structure is directly proportionate to information supplied by the applicant. If the goods concerned covers a range of goods with different characteristics that would affect comparability:
- Please describe the key physical characteristics that have a consequential and material effect on prices, with the list of characteristics going from most to least consequential
  - Please provide evidence to substantiate that these physical characteristics have a consequential and material effect on prices. This evidence could be in reference to specific unit costs, if those costs effect price comparability
  - Use this information to delineate between models of not only the goods produced by the UK industry, but by the exporting producers, giving the information requested in the subsequent sections in refence to each model rather the goods category as a whole. The annex will indicate where information is being asked for on an individual model basis.
  - If you already have a view on a PCN structure, please propose that here.

*The company operates a 10 digit alpha/numeric coding system with a unique code for each product and customer variant. The code can be extended to more than 10 digits if required for individual customer requirements:*

*Digits 1-2,*

*Alpha, represents the category that the product is a member of.*

*Digits 3-5,*

*Numeric, represent the product size variant.*

*Digits 6-7*

*Numeric, represent the different product configurations, legs, rests, accessories.*

*Digits 8+*

*Represent the individual customer variants including the fabric design, inserts, packaging and paint colour.*

*ANNEX J is a matrix showing how the different variants are coded*

Appendix reference:

## About the Application

Individuals or groupings of companies, individuals and trade bodies can all be applicants. Generally, an industry that is concerned about a set of imported goods should make only one application to us for an investigation. When we assess your application, we will consider information about all the companies which make up the group that is applying. When you are answering questions about the goods you produce, please include information about the goods produced by all the companies and individuals who are submitting this application.

### Applicant Information

Name of Applicant

*The details of the applicant has been removed because it would reveal information to third parties, customers and competitors which could compromise the ongoing business relationships with the applicant in a negative way particularly if customers took an adverse view on the application and could put the applicant in a negative spotlight in their businesses. It cannot be redacted or summarised as to give any information would be to give all information.*

Address

See Above

Email

See Above

Telephone

See Above

Contact Name

See Above

Company Ownership (provide broad details of shareholding)

See Above

Name of Lawyer/Representative

None

## Period of Investigation

For the subsequent sections, please use the same 12-month period for every question and indicate below which 12-month period you are using. This period should not end more than six months before the date this application is submitted. This period will be referred to as 'the period of investigation (POI)' for the rest of the application. The 36-month period preceding the POI, will be referred to as the injury period. Please indicate the 12-month POI in the box below.

*12 Months to 31/12/2021*

Please give the volume and value of like goods you produced in the UK for the POI.

*In the 12 months to 31/12/2021 the applicant produced [Confidential commercial information. It is summarised as indexed on schedule 1] Representing, 100% of total UK manufacture of ironing Boards.*

## About Other Interested Parties

### UK Producers

Your application must be supported by other UK producers who represent at least 25% of total UK production. This is based on production physically located in the UK. The level of support for the application must be greater than the level of opposition among UK producers.

If there are other UK producers, you will need to contact them and ask them whether they support or oppose this application. Please attach their written responses to your application OR their details should be provided below. Use a separate table for each producer.

We understand that other producers may be concerned about providing confidential information for this form. If necessary, you can ask an independent third party to confidentially combine information from the individual companies. Alternatively, the other producers can send the information separately to the TRA for us to combine.

<b>UK producer</b>	
Legal name of company:	
Name (point of contact):	There are no other UK producers.
Role:	
Address:	
Telephone No:	
Email:	
Company website:	
<b>Goods produced</b>	
Please list all the UK-made goods this producer makes which are sold on the UK market and are like the imports this application is about	
<b>Position regarding application</b> (delete as applicable)	Support/oppose/undeclared

## Other Parties

1. Provide details of all known producers/exporters in the exporting country or producer/exporter associations in the exporting country, including:

Name:	<i>[This producer/exporter has been identified through direct confidential communication and as a result the details of this producer/exporter have been removed because it could compromise the ability to work with these suppliers on supplying other items in the future should they take an adverse view of the application. There are limited suppliers in these markets to go to. It cannot be redacted or summarised as to give any information would be to give all information].</i>
Address:	<i>[See Above]</i>
Email:	
Telephone Number:	<i>[See Above]</i>

Name:	[This producer/exporter has been identified through direct confidential communication and as a result the details of this producer/exporter have been removed because it could compromise the ability to work with these suppliers on supplying other items in the future should they take an adverse view of the application. There are limited suppliers in these markets to go to. It cannot be redacted or summarised as to give any information would be to give all information].
Address:	[See Above]
Email:	
Telephone Number:	[See Above]

Name:	[This producer/exporter has been identified through direct confidential communication and as a result the details of this producer/exporter have been removed
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	because it could compromise the ability to work with these suppliers on supplying other items in the future should they take an adverse view of the application. There are limited suppliers in these markets to go to. It cannot be redacted or summarised as to give any information would be to give all information].
Address:	[See Above]
Email:	
Telephone Number:	[See Above]

Name:	[This producer/exporter has been identified through direct confidential communication and as a result the details of this producer/exporter have been removed because it could compromise the ability to work with these suppliers on supplying other items in the future should they take an adverse view of the application. There are limited suppliers in these markets to go to. It cannot be redacted or summarised as to give any information would be to give all information].
Address:	[See Above]
Email:	
Telephone Number:	[See Above]

Name:	[This producer/exporter has been identified through direct confidential communication and as a result the details of this producer/exporter have been removed because it could compromise the ability to work with these suppliers on supplying other items in the future should they take an adverse view of the application. There are limited suppliers in these markets to go to. It cannot be redacted or summarised as to give any information would be to give all information].
Address:	[See Above]

Email:	
Telephone Number:	[See Above]

Name:	[This producer/exporter has been identified through direct confidential communication and as a result the details of this producer/exporter have been removed because it could compromise the ability to work with these suppliers on supplying other items in the future should they take an adverse view of the application. There are limited suppliers in these markets to go to. It cannot be redacted or summarised as to give any information would be to give all information].
Address:	[See Above]
Email:	
Telephone Number:	[See Above]

2. Provide the details of all known importers of the goods in the UK or any associations of importers in the UK, including:

Name:	[This Importer has been identified through direct confidential communication and as a result the details of this importer have been removed because it could compromise the ability to work with this importer in the future should they take an adverse view of the application. There are limited importers in these markets to go to. It cannot be redacted or summarised as to give any information would be to give all information].
Address:	[See Above]
Email:	
Telephone Number:	[See Above]
Contact person (if available)	
Nature of their business (retailer/agent etc)	[See Above]

Name:	[This Importer has been identified through direct confidential communication and as a result the details of this importer have been
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	removed because it could compromise the ability to work with this importer in the future should they take an adverse view of the application. There are limited importers in these markets to go to. It cannot be redacted or summarised as to give any information would be to give all information].
Address:	[See Above]
Email:	
Telephone Number:	[See Above]
Contact person (if available)	
Nature of their business (retailer/agent etc)	[See Above]

Name:	[This Importer has been identified through direct confidential communication and as a result the details of this importer have been removed because it could compromise the ability to work with this importer in the future should they take an adverse view of the application. There are limited importers in these markets to go to. It cannot be redacted or summarised as to give any information would be to give all information.]
Address:	[See Above]
Email:	
Telephone Number:	[See Above]
Contact person (if available)	
Nature of their business (retailer/agent etc)	[See Above]

3. Provide the details of all known suppliers, users and consumers of the goods in the UK, or associations of suppliers, users or consumers including:

Name:	[This User has been identified through direct confidential communication and as a result the details of this user have been removed because it could compromise the ability to work with this user in the future should they take an adverse view of the application. There are limited users in these markets to go to. It cannot be redacted or summarised as to give any information would be to give all information]
Address:	[See Above]
Email:	

Telephone Number:	[See Above]
Contact person (if available)	
Nature of their business (retailer/agent etc)	[See Above]

Name:	[This User has been identified through direct confidential communication and as a result the details of this user have been removed because it could compromise the ability to work with this user in the future should they take an adverse view of the application. There are limited users in these markets to go to. It cannot be redacted or summarised as to give any information would be to give all information].
Address:	[See Above]
Email:	
Telephone Number:	[See Above]
Contact person (if available)	
Nature of their business (retailer/agent etc)	[See Above]

Name:	[This User has been identified through direct confidential communication and as a result the details of this user have been removed because it could compromise the ability to work with this user in the future should they take an adverse view of the application. There are limited users in these markets to go to. It cannot be redacted or summarised as to give any information would be to give all information.]
Address:	[See Above]
Email:	
Telephone Number:	[See Above]
Contact person (if available)	
Nature of their business (retailer/agent etc)	[See Above]

Name:	Users – Most persons in the UK
Address:	Most Households in the UK
Email:	
Telephone Number:	

☐ Confidential☒ Non-Confidential

Contact Person (if available)	
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## Representativeness

### Summary of UK Producer support or opposition for this application

We need to know about the total volume of UK production for UK markets by the producers who support your application. **Please complete Annex 1**, which will guide you through the calculation of whether representativeness requirement is met in terms of volume and value. If any figures are estimates, please explain how you worked out this information.

*There is only one UK Producer*

### Market Share

1. The applicant UK industry/industries should have at least a 1% share of the UK market for the goods, irrespective of where the goods were produced. Please demonstrate this by **completing Annex 2**. If you have other specific market share information, please also provide that.

*Annex 2 confirms that the applicant comfortably has over 1% share of the UK market for the goods*

2. Please note that the requirement can be waived in certain circumstances, for example if your application is about imports preventing a UK industry from being established for a 1% market share. If you think the requirement should be waived, explain why.

*This is not applicable, the Applicant already has considerably more than a 1% market share*

### Related Persons

If you know that the Applicant or any other known UK producer of the goods is related (as defined under [Regulation 128](#) of the Customs (Import Duty) (EU Exit) Regulations 2018 (a)) to an exporter or an importer of the goods, describe the company and the relationship.

*The Applicant is not related to an exporter or an importer of the goods.*

## About the allegedly dumped imports you want us to investigate

Complete this section if you are making an application for a dumping investigation.

Please give us all the information you can about the imported goods you believe are being dumped and the injury being caused to UK industry.

### Sufficiency Test

Please note that we may reject your application if there is not sufficient evidence of dumping or injury. Evidence of dumping is insufficient if the margin of dumping is less than 2% of the export price (minimal).

1. List all countries (or territories) where the imported goods are produced (country of origin) and the countries (or territories) from which they are exported to the UK, if this is different.

*Not Applicable*

2. **Complete Annex 2**, giving the volume and value of the imported goods for the POI, to demonstrate percentage of total imports.
3. Provide details and evidence of how the volume and value of dumped imports have been calculated.

*Not Applicable*

### Normal value

Normal value refers to the domestic price that the imported goods are normally sold for on the domestic market in their country of export. This value should then be adjusted for costs arising after the ex-works (EXW) level (and any other factors that need to be considered) to make a fair comparison with the export price.

If your complaint concerns more than one exporting country, calculate the normal value for each country

There are several different methods for calculating normal value, with the appropriate method being determined by the circumstances of trade between the exporting country and the UK, and the nature of exporting country's economy.

Therefore, when you tell us the normal value of the goods, you will also need to explain which method you are using to calculate it and why.

The methods are:

- ‘Comparable Price’, this is the price of the goods in the ordinary course of trade in the home market of the exporting country;
- Constructed Normal Values in the country of export based on the cost of production, plus reasonable amounts that would have been incurred on a domestic sale in the country of export for administrative, selling and general expenses and for profit;
- ‘Sales made to a third country by the exporter’, provided this amount is representative of the domestic selling price in sales in the country of export (provide evidence to support this); or
- If none of the above is possible, establish the normal domestic value from the best information available to you and provide this information to us, along with an explanation of the approach you have adopted. Alternatively, if prices in the exporter’s domestic market are unavailable and it is not possible to construct a normal value, please contact the TRA to discuss further options.

Where possible, you should calculate normal value using the ‘Comparable Price’ Method. However, there are situations where this would be inappropriate, and so one of the alternative methods should be used. This includes situations where:

- the goods are not sold in the ordinary course of trade in the domestic market of the exporting country;
- these sales on the domestic market of the exporting country sales don’t allow a proper comparison with their sales on foreign markets because of:
  - a particular market situation;
  - low volume of sales in the domestic market of the exporting country;
- the overseas exporter does not sell these goods in their domestic market;
- the imports are from a particular foreign country – this is a specific term defined under [Regulation 14 of the Dumping & Subsidy Regulations](#) which means that it’s difficult to use prices of goods in that country as a fair comparison.

More information on each of these conditions and when they apply can be found in [our guidance on dumping investigations](#).



## Method

Please indicate below the method you have used for calculating normal value of the imported goods. If you have used an alternative basis to comparable price (e.g. constructed normal value), please explain why you believe it isn't appropriate to use comparable price and provide your evidence to support this.

*Not Applicable*

Please give the normal value calculations using the appropriate section below, making sure to use the section relevant to the method you have described in this section. Delete tables for any methodologies you are not using.

The evidence you provide of normal value should, as far as possible:

be representative of different product types or models within the goods you are applying to us to investigate, if there are substantial differences in the normal value between these product types and models; and relate to normal value spread over the POI

## Comparable Price

Prices should be net ex-works (EXW) and exclude all internal taxes, such as VAT. If EXW prices are not available e.g. if Cost Insurance and Freight (CIF) or Free On Board (FOB) prices are the only ones available, these prices should be adjusted to bring them to a net ex-works level. If using this method, **please complete Annex 3.**

## Constructed Normal Value

**Please complete Annex 4**, explaining how each cost was calculated including:

- materials;
- direct labour;
- overheads;
- administration, sales and general expenses (ASG), excluding transport costs; and
- the reasonable profit margin in the country of origin.

*Not Applicable*

Where there is a particular market situation, make adjustments to elements of cost or

profit that are not substantially determined by market forces. For further information, see our guidance on [adjusting costs when constructing normal value](#) or contact our Pre-Application Office ([contact@traderemedies.gov.uk](mailto:contact@traderemedies.gov.uk))

For any of the above methodologies, attach supporting documentation for the prices, costs and any adjustments (see below) you have made. This can include:

- price lists;
- price quotations;
- sales invoices for domestic sales;
- sales correspondence;
- publicly available material containing information on domestic selling prices; and
- market surveys.

*Not Applicable*

## Selling Price from Exporter to a Third Country

If this is the preferred method, **please use Annex 3**, indicating here which country you are using, and amending the listed adjustments to better reflect the adjustments made. Prices should be net ex-works (EXW) and exclude all internal taxes, such as VAT. If EXW prices are not available e.g. if Cost Insurance and Freight (CIF) or Free On Board (FOB) prices are the only ones available, these prices should be adjusted to bring them to a net ex-works level

*Not Applicable*

## Appropriate third country

This method is only available for particular foreign countries as defined under [Regulation 14](#) of the D&S Regulations.

1. Nominate an appropriate third country so you can establish normal values based on their selling prices.

*Not Applicable*

2. Explain your basis for selecting this third country.

*Not Applicable*

3. **Please use Annex 3** to calculate the Normal value based on the third country data, amending the listed adjustments to better reflect the adjustments made. Prices should be net ex-works (EXW) and exclude all internal taxes, such as VAT. If EXW prices are not available e.g. if Cost Insurance and Freight (CIF) or Free On Board (FOB) prices are the only ones available, these prices should be adjusted to bring them to a net ex-works level

## Export price of the goods

The export price is the selling price of the goods from the exporting country to a UK importer or a third party for export to the UK. This is adjusted to account for export costs and calculated back to the ex-works export price in the country of export. In most cases, you can base the export price on the price charged by the exporter to an unrelated importer in the UK. If your complaint concerns more than one exporting country, calculate the export price for each country

However, you may need to construct export price based on sales to first independent buyers or another reasonable method if:

- there is no export price;
- the price is unreliable due to an association or compensatory arrangement between the exporter and UK importer or third party.

Before providing the export price of the goods, please explain which basis you are using to calculate this and why. If you have constructed the export price, please give your reasoning for doing this and evidence to support this.

*Not Applicable*

Please give your export price calculations in the appropriate table below. Make sure you use the basis you described above and delete tables for any methodologies you are not using. Please note that whichever methodology you use, you will need to provide an export price on a CIF and EXW level. You should use price information from the POI.

The evidence you provide of the export price should, as far as possible:

- be representative of different product types or models within the goods you are applying to us to investigate, if there are substantial differences in the normal value between these product types and models; and

- relate to normal value spread over the POI

If either/both of these are not possible, please explain why. If you consider that export prices would not have varied significantly over the last year and so prices over the period outlined above would not be relevant for establishing representative export prices, please explain why you consider that to be the case.

## **Export price based on the selling price of the goods from the exporting country to a UK importer or a third party for export to the UK**

Provide the export prices of the allegedly dumped goods using Annex 5 Evidence and individually itemise the costs subtracted from this selling price to bring it back to an ex-works level, such as publicly available freight rates. Explain how the amounts were established.

Provide documentary evidence for the selling price to the importer in the UK, such as:

- sales invoices;
- written offers;
- price quotations;
- sales correspondence; or
- official statistics.

*Not Applicable*

## **Constructed Export Price**

Calculate the constructed export price(s).

You may need to adjust for any costs included in the selling price which relate to the movement of the goods to the UK. If you are using sales to the first independent buyer as a basis for constructing, establish the details of the first sale to an independent buyer in the UK and deduct taxes, costs, charges, expenses and profit margins to obtain an ex-works price in the country of origin.

If there are different models or types of product for the imported goods, please construct a price for each one. Provide each adjustment separately. If your starting

point is a CIF value, you will only have to find and deduct costs incurred by the exporter in the country of export from CIF back to the ex-works level.

Provide evidence to show how you have calculated or estimated the export prices. Include all the evidence you have on the resale price of the imported goods in the UK. Provide the basis for the costs and profits subtracted from this selling price to bring it back to an ex-works level such as published industry mark-ups or publicly available freight rates and give evidence to support each cost adjustment.

*Not Applicable*

## Fair Comparison

To achieve an appropriate price comparison, the export price and the normal value should be compared at a fair level, in terms of their basic physical and chemical characteristics and the terms and conditions of sale. To achieve this comparison, please adjust your calculations to account for any differences which affect price comparability. This means that the comparison should be made at the same level of trade (such as wholesale or retail), at ex-factory level (EXW), and where possible, at the same time.

For certain types of adjustment, only the normal value may need to be adjusted. Sometimes both the normal value and export price will need to be adjusted. Use the table of adjustments below to check if the adjustment can be applied to export price or normal value or both. For more information, please consult our [fair comparison guidance](#).

Table of adjustments	Export Price	Normal Value
Physical characteristics	No	Yes
Import charges and indirect taxes	No	Yes
Discounts, rebates, quantities	Yes	Yes
Level of trade	No	Yes
Transport, insurance, handling	Yes	Yes
Packing	Yes	Yes
Credit	Yes	Yes
After sales costs	Yes	Yes
Commissions	Yes	Yes
Currency Conversion	Yes	Yes

1. Provide the relevant adjustments so you can compare the export price and normal value.

*Not Applicable*

2. Provide, for all adjustments you make, the following:
- details of the differences that resulted in an adjustment;
  - details of how you produced the estimate of the allowances for the differences; and
  - supporting evidence concerning these differences.

*Not Applicable*

## Dumping Margin

If the overall dumping margin calculated across all product types/models and across all transactions is **less than 2%**, the Regulations consider this to be minimal and we cannot initiate an investigation.

1. Calculate the dumping margin. **Complete Annex 7**, repeating the calculation for each different model of the imported goods you have previously identified. Make sure you do this for each export price you have provided and for the normal value you have provided which is most closely comparable to that export price. If your complaint concerns more than one exporting country, calculate the dumping margin for each country.

If the normal value or the export price (or both) you have used was not an ex-works price, please describe the level of trade it relates to.

*Not Applicable*

## Subsidised imports

Complete this section if you are making an application for a subsidy investigation.

In order for us to investigate whether the goods are subsidised, we must be satisfied that the application contains enough evidence:

- that the goods are being imported
- that the goods are subsidised
- that the goods are causing injury to UK industry
- that the volume of goods and injury is more than negligible and the amount of subsidy is more than minimal
- that the market share is met or waived.

‘Minimal’, for developed countries, means a subsidy amount that is less than 1% of the estimated value of the goods (2% in the case of a developing country).

‘Negligible’ is where the exporting country accounts for less than 3% of imports of the goods in question into the UK (less than 4% in the case of a developing country). The other exception to this is where the exporting countries individually account for less than 3%, but collectively account for more than 7% of imports of the goods being imported.

### Volume of subsidised imports

1. List all countries (or territories) that export the goods to the UK, noting whether they are the country of origin or just the exporting country; in the latter case, please provide the identity of the country of origin.

*The subsidised imports to the UK are originating in Turkey and imported from Turkey*

Appendix reference:

2. **Complete the Annex 2**, giving the volume and value of the imported goods for the POI, to demonstrate percentage of total imports.
3. Provide details and evidence of how the volume and value of subsidised imports have been calculated.

*A Freedom of Information (FOI) request confirmed the total value and weight imported for the specific ironing boards tariff codes. Annex E1 and E2 are the data*

*received in response to the request This data is used in Annex E3 to calculate the import values and market share of imports. From this information we can estimate an average number of ironing boards imported together with an average UK retail price. This enabled completion of Annex 2 which indicates the applicant has a volume market share of a range of 30%-45%. The range of the subsidised imports as a percentage of total imports would be 35%- 50%*

Appendix reference: Annex 2, Annex E1, Annex E2 and Annex E3

## Countervailable subsidies in the exporting country

A subsidy exists if there is a financial contribution by a foreign authority which confers a benefit on the recipient (usually an industry or business manufacturing goods) or a form of income or price support received from a foreign authority which confers a benefit on the recipient. Forms of income and price support are defined in [Article XVI of the General Agreement on Tariffs and Trade 1994](#) (part of Annex 1A to the WTO Agreement).

Not all subsidies are countervailable. A subsidy is countervailable if it is specific to certain companies or industries (rather than general) and when it is granted either directly or indirectly for the manufacture, production, export or transport of goods.

Please refer to our guidance on [How we carry out a subsidy investigation](#) for further information.

1. Using the table below, list all known countervailable subsidy programmes in the exporting country which relate to the production and/or sale of the goods you are asking us to investigate. Subsidy programmes can include, but are not limited to:
  - Grants
  - Loans and loan guarantees
  - Tariff/tax exemptions (including VAT/Sales Tax)
  - Debt for equity swaps
  - Land use rights
  - Export credits and financing
  - Equity infusions
  - Provision of goods and services
  - Purchase of goods



- Income or price support arrangements.

### Subsidy programmes

Subsidy name	Subsidy type
<i>Turkish Free Zones</i>	<i>See Annex B1 , B2 and B3 for details of subsidy benefits</i>

+Add/remove additional rows as required.

To understand if there has been a financial contribution, we need to identify if:

- there has been a direct transfer of funds from a foreign authority, including making money and financial resources available;
- there has been a potential direct transfer of funds from a foreign authority, including a commitment to transfer funds;
- revenue that is rightfully due to government has not been collected (waived or deferred), including, taxes, debt, derivatives, or dividends;
- goods and services have been provided for by a foreign authority, at a lower amount than normally would have been paid;
- goods were purchased from a producer by a foreign authority, that artificially increases the revenue gained from selling the goods; or
- a foreign authority has:
  - made payments through a financial mechanism, or
  - entrusted or directed a private body to carry out any of the above functions.

2. For all subsidy programmes listed above, please explain and provide documentary evidence of the subsidy programme (the financial contribution), including:

- the subsidy programme's commencement date;
- the subsidy amount or value; and
- the frequency of subsidy i.e. one-off or re-occurring.

*The subsidy programme has been established across 18 regions between 1985-2000 and operates today.*

Appendix reference: B1
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3. For all subsidy programmes listed above, please explain and provide documentary evidence that the subsidy has been (or is still being) provided by a foreign authority.

<i>Annex B2 is an extract from the current Republic of Turkey – Ministry of Trade web site. The site details 15 advantages of the Free Trade Zones, including: tax advantages, customs duty benefits, access to markets and supply chain opportunities. These benefits act as subsidies for Turkish suppliers..</i>
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Appendix reference: B2
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As well as establishing that a subsidy is in place, we need to understand the benefit it confers on the recipient. A benefit cannot exist theoretically – it has to be received by a recipient. It is important to note that the recipient of the benefit doesn't necessarily need to be the same recipient that received the financial contribution. For example, a subsidy provided to an upstream industry provides a benefit to a downstream industry.

4. For all subsidy programmes listed above, please explain and provide documentary evidence of the effect of the subsidy on the production and sales of the goods being imported to the UK.

<i>Annex B3 provides a calculation based on a number of assumptions of the benefits of the subsidies]</i>
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<i>Commercial information has been obtained from a number of sources in Turkey (Annex C1.1, C1.2, C1.3)[ these annexes are confidential due to commercially sensitive information. The documents contain commercially confidential information from sources in Turkey and includes imported product details. It is confidential on behalf of the applicant and the Turkish sources as to reveal this would reveal confidential information to third parties and competitors which could compromise the ongoing business relationship with the Turkish sources. To reveal this information further would damage ongoing business relationships with the parties. They have been indexed and included in Annex C3. A comparison of Turkish ironing boards and UK manufactured boards can be seen on Annex C2]</i>
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<i>The effect on retail prices can be demonstrated by comparison to the same size of UK manufacturers ironing boards. The subsidy enables the Turkish suppliers to undercut the UK manufacturers and reduce the retail price by between 20% and 45% (Annex C2)</i>
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*The imported ironing boards are made of the same components as the UK manufactured boards and therefore material and manufacturing cost can be compared. Annex M shows details of manufacturing cost for the UK manufacturer [ This annex has been removed as it contains confidential manufacturing and cost detail of the UK manufacturers product. This would be detrimental to the applicant if it was made publicly available because it would give a clear competitive advantage to competitors and would be extremely damaging to the applicant if competitors were to see the cost structure.]. The values have been indexed and used in Annex C3 showing that subsidies are being used to reduce retail prices in the market and remove market competitiveness. The Turkish producers are selling finished products at around the cost of the unmanufactured raw material content of a UK Ironing Board.*

Appendix reference: B3, C1.1,C1.2,C1.3  
C2, M,C3,

5. For all subsidy programmes listed above, please explain and provide documentary evidence of the specific nature of the subsidy, including:
- conditions of eligibility to receive the subsidy;
  - all known recipients of the subsidy;
  - whether the subsidy is only available to certain regions or territories within the exporting country.

*Point 7 of Annex B2 confirms that the incentives and advantages provided in the free zones are available to all firms regardless of their origin.*

Appendix reference:B2

## Calculating how much subsidy the imported goods attract

We need to understand the amount of subsidy which the subsidised imports receive. If we establish that a measure is needed to counteract the injury the goods are causing to the UK market, this will help us determine what sort of measure to recommend and at what level.

To make this calculation, we will need to establish:

- the total amount of the countervailable subsidy;
- the amount of the countervailable subsidy that can be attributed to the POI;
- and

- which goods the countervailable subsidy can be allocated to during the POI.
1. For all subsidy programmes listed above, please explain and provide documentary evidence about the total amount of countervailable subsidy that the imported goods attract. You will need to explain the calculation methodology used. It is the benefit to the recipient that matters, not the cost (or opportunity cost) to the foreign authority. You should refer to our [How we assess the benefit a subsidy provides](#) guidance to understand what is required.

*The subsidy for the imported goods has been calculated from Turkish ironing boards compared to a constructed value for the ironing boards by the applicant. . Annex G has been removed as it contains commercially confidential information obtained from a Turkish source and commercially confidential information relating to our cost base compared to that source.*

*To reveal this would reveal the cost base of both the applicant and Turkish companies to third parties and competitors, which would be damaging and it would also damage business relationships were this made public.*

*This Annex cannot be redacted or summarised because the confidential commercial and internal information can't be redacted because to do so would mean redacting everything which would render the open version meaningless.*

Appendix reference:, G

2. For all subsidy programmes listed above, please explain and provide documentary evidence relating to the amount of the countervailable subsidy that can attributed to the period of investigation, including the calculation methodology you used. You should refer to our guidance on [Determining the amount of the subsidy that can be attributed to the period of investigation](#) when completing this section.

*Using the calculation of the number of boards imported from Turkey in Annex F, we can estimate that the subsidy that can be attributed to the period of investigation on is in the range £2m - £5m*

Appendix reference: F,G

3. For all subsidy programmes listed above, please explain and provide documentary evidence relating to the goods the countervailable subsidy that can be attributed to during the period of investigation, including any calculation methodologies used. You should refer to our guidance on [Determining the amount of the subsidy that can be attributed to the period of investigation](#) when

completing this section. We will be specifically looking at whether the subsidy is linked to the export of certain goods, the sale of certain goods, or to sales to a certain market.

*Using the same calculations as above the subsidy that can be attributed to during the period of investigation is [Range £8m- £11m]*

Appendix reference:

## Injury

This section is about injury which the imports may be causing to the UK industry for the goods.

Injury as defined by the Act can refer to:

- Material injury, or the threat of material injury to the industry, or
- Material retardation of the establishment of the industry.

If your industry has suffered or is suffering material injury, all companies/associations involved in this application must complete the section G1 separately. This section should also be completed to represent the entire UK industry. Label each completed section clearly showing who it relates to.

If your industry is threatened with material injury but there is no injury yet, all companies/associations involved in this application must complete the section G1 separately. This section should also be completed to represent the entire UK industry. Label each completed section clearly showing who it relates to.

If your industry is nascent and is being or has been materially retarded, please contact us at [contact@traderemedies.gov.uk](mailto:contact@traderemedies.gov.uk).

### Material Injury

Material injury is determined through a number of injury indicators. Not all the injury factors need to indicate material injury, but all the factors need to be considered in order to establish material injury. These include, but are not limited to:

- Actual and potential decline in: sales, profit, output, market share, productivity, return on investments, or use of capacity;
  - Factors affecting domestic prices of the goods;
  - The magnitude of the margin of dumping and/or the amount of subsidy; and
  - Actual and potential negative effects on: cash flow, inventories, employment, wages, growth, ability to raise capital, or investments.
1. Please describe, with appropriate figures, how the UK industry for these goods has performed in terms of each of the above injury indicators for the POI, and injury period.
    - Explain how you have calculated the figures and substantiate your figures with evidence.
    - Provide evidence for each indicator.

- If you don't know the exact figures for other UK producers, provide an estimate based on reasonable assumptions.
- State the methodology and assumptions that you used.

<i>The UK industry has suffered a decline in sales, profitability and output due to the import of the goods from Turkey. The applicant believes that considering the 15 injury indicators from article 3.4 of the WTO anti-dumping agreement, the UK industry has been injured by the subsidies.</i>	
<b>Actual and potential decline in:</b>	
<i>Sales</i>	<i>Annex L is indexed and illustrates the declining sales and this is expected to continue unless a remedy is applied.</i>
<i>Profits</i>	<i>Annex L also includes an indexed calculation of the decline in profits.</i>
<i>Output</i>	<i>Annex H illustrates the decreasing level of production on a moving annual total basis for the last 4 years.</i>
<i>Market share</i>	<i>Annex 2 of the application illustrates a drop in market share as a result of imports from Turkey.</i>
<i>Productivity</i>	<i>The overhead and labour recovery rates have declined by [range 10%-20%] over the period of injury as a result of the drop in volumes.</i>
<i>Return on Investments</i>	<i>Any decline in sales and profitability gives a decreased and eventually nil return on investments or lead to losses.</i>
<i>Utilisation of capacity</i>	<i>The lower volumes in Annex H mean that capacity is not being utilised.</i>
<b>Factors affecting domestic prices of like goods</b>	<i>The only reason that retailers are buying the imports is lower price of imports .</i>
<b>Actual and potential negative effects on</b>	
<i>Cash Flow</i>	<i>Annex L illustrates the decline in cash flow as a result of the declining sales and profit.</i>
<i>Inventories</i>	<i>Annex L shows an indexed figure for inventories.</i>
<i>Employment</i>	<i>Any decline in sales and profitability leads to a decline or possible elimination in employment levels.</i>
<i>Wages</i>	<i>Wages are paid under labour market conditions and requirements and are therefore independent or unaffected by subsidised Turkish product pricing.</i>
<i>Growth</i>	<i>The market is fairly static so unfairly priced imports has taken away volume from the applicant. Resulting in a decline in volumes.</i>

<i>Ability to raise capital or investments</i>	<i>Without the ability to make profits due to declining sales and suppressed prices and margins due to unfairly priced imports .It would be impossible to raise capital for future investment.</i>
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*There is evidence that the goods are being imported from Turkey. Annex E2 The FOI information shows that the goods are being imported from Turkey.*

*There is evidence that the imported goods are having a significant effect on the prices of goods in the UK. Annex C2 shows the difference in retail price for these goods for like products. The imports also have an overall effect of suppressing prices in the UK market.*

*Retail Customers we have sold ironing boards to in the past have moved to imported boards from Turkey [Annexes D1,D2 and D3 are Confidential – These annexes relate to internal emails conveying details of confidential conversations with customers about location and reasons for sourcing and supply and are confidential on behalf of both the customers and internally as they reveal our commercial approach. They cannot be further redacted or summarised as they would then become meaningless. In addition to reveal publicly more of this information would damage ongoing business relationships with the parties.*

*The boards are made of the same components as the UK manufacturer and as a result we can use our experience of dealing with these retailers to deconstruct the prices. The cost of an ironing board from the UK manufacturer is indexed on Annex C3 and Annex C3 shows how the UK manufacturer cannot meet the price to the retailers on the similar products based on manufacturing cost alone.*

*The injury to the UK manufacturer is illustrated in Annex F which, calculates out the loss of sales, and profit for the UK manufacturer based on the level of imported boards. For the POI the loss of sales and profit is range £5m-£10m and £1.5m - £3m respectively and this then totals £25m - £40m and £8m- £11m for the period of injury.*

*The level of production of ironing boards in the UK has fallen (see Annex H) illustrating the effect that the imports are having on UK production.*

- Is your company suffering injury which you believe to have been caused by the imported goods? If so, please describe the injury. You may want to include the prices, volumes or profits associated with your production and sale of the goods you manufacture or describe other aspects of your business. Please specify and substantiate your claims with evidence. Please estimate the date when the injury began to affect your business. Explain how it has developed since this date.



*As the only UK manufacturer, Annex F calculates out the loss of sales, and profit for the Applicant based on the level of imported boards. For the POI the loss of sales and profit is range £5m-£10m and £1.5m - £3m respectively and this then totals £25m - £40m and £8m- £11m for the period of injury.*

*Annexes D1,D2,D3 have been removed as they include internal emails conveying details of confidential conversations with customers about location and reasons for sourcing and supply and are confidential on behalf of both the customers and internally as they reveal our commercial approach. they cannot be further redacted or summarised as they would then become meaningless. In addition to reveal publicly more of this information would damage ongoing business relationships with the parties. Annex L includes a table showing the indexed reduction in sales across these retailers.*

3. Report your total cost to make and sell like goods in the UK. Please clearly separate your costs of production (direct manufacturing costs and indirect costs), from your administrative, selling and general expenses (AS&G). Provide costs for each model that you produce. When giving your labour costs, please ensure you include all labour costs, directly or indirectly incurred by any activity related to the goods.

*Annex C3 gives indexed manufacturing costs of an ironing board at the UK manufacturer, This Annex clearly shows that the prices from Turkey are not sufficient to cover the manufacturing costs. Annex C3 has been prepared using different steel prices experienced over the last 12 months.*

4. For the goods that you produce, please state what level of profit, before tax and as a percentage of turnover, your company would expect to achieve if there was no injury from the imported goods and explain how you arrived at this figure.

*If there was no injury from the imported goods we would expect to achieve a level of Range 5% - 10% profit before tax.*

5. Explain if your current sales prices for the goods are the same as your target sales prices. If not, please explain the reasons for this.

*The import of the subsidised Turkish ironing boards allows the retailers to sell ironing boards to their customers for a much lower price than can be achieved if they were to buy UK manufactured product, whilst at the same time maintaining their profit margins. This suppresses pricing in the overall market. Annex K illustrates that the Turkish suppliers are selling like ironing boards.*

*Annex C3 illustrates that the quotes received from Turkish suppliers (which can be assumed to be the same as provided to retailers) are at a price less than the direct costs to manufacture the equivalent board in the UK.*

*The result of this is illustrated in Annex L which has indexed the level of sales lost from 3 retailers. ,*

6. Provide details of any price undercutting and and/or if the prices of the dumped and/or subsidised imports are reducing or negatively affecting prices in the UK. Compare the sales prices of the dumped and/or subsidised imports with the sales prices of your goods on the UK market. Include any supporting evidence.

*Annex C2 illustrates the differences between the sales prices to the end user of Turkish imported product and the equivalent UK manufactured product the difference is between 20%-45%.*

*In each case the board will include a profit margin for the retailer. Annex C3 shows that the prices of the Turkish ironing boards are below the UK manufacturing costs.*

## Threat of injury

1. Describe the change in circumstances that means the threat of material injury from dumping and/or subsidisation is foreseeable and imminent. The factors behind these changes could include:
- the rate of increase of dumped and/or subsidised imports;
  - changes to the available production capacity of the exporters;
  - changes to inventories of the imported goods (i.e. if large stocks of these goods are building up in their country of origin ready for export);
  - expected price depression or price suppression of further imports; and
  - any other relevant factors.

*The applicant considers that it has demonstrated, in the previous section of this application, that it is suffering material injury. [Original document includes a sentence that is confidential as it includes an internal management assessment]*

2. If appropriate, include an analysis of trends (or a projection of trends) and market conditions illustrating that the threat is both foreseeable and imminent.

*Not Applicable*

3. Explain why you believe the threatened injury to your industry will be material.

*Not Applicable*

## Causal link between the imported goods and injury to your industry

For the TRA to initiate an investigation, there must be evidence of a causal relationship between the injury to the UK Industry and the alleged dumping and/or subsidisation.

1. If your company is suffering injury, please explain and provide evidence that shows how this has been caused by the goods you want us to investigate. Describe how the volumes and prices of the imported goods have affected your industry, basing your answer on the injury indicators in the previous section.

*The applicant has lost business in retailers due to the import of Turkish boards. Annex L includes an indexed table which shows the lost sales from 3 retailers as they move to Turkish supply.*

*The significant increases in steel prices in the UK should have resulted in the applicant having to request price increases to cover the increased costs but the applicant has had to hold back in executing the increases for fear of losing more business to imports*

2. Please indicate if the injury to your industry could be attributable in part or in full to any factors other than dumped or subsidised imports, 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 industry.
  - This may be relevant as an industry weakened by other events may be more susceptible to injury from dumped or subsidised goods.

3. Please provide evidence to support this information.

*The FOI information shows that boards are being imported predominantly from China, India, Turkey and Vietnam. In the case of China anti-dumping measures are already in place. The injury could therefore be attributable in part to circumvention of the anti-dumping duties already in place.*

*The largest element of cost to manufacture the ironing boards is steel and the UK has Quotas and tariffs on steel imports but not on products manufactured that include steel. The injury could therefore be attributable in part to not having protection for UK manufacturers of steel inclusive products.*

## Other Comments

A request for immediate imposition of duties up to 109% on ironing boards being imported from Turkey.

The Applicant requests that the Secretary of state orders the imposition of duties on the import of the goods concerned by this application and originating in Turkey, from the date of initiation of the investigation.

The Applicant is suffering material injury both in terms of losing business to Turkish manufacturers as a result of selling products below our direct costs and also in respect of suppressing the normal prices that the product can achieve.

The Applicant considers that this situation merits the imposition of duties on the goods concerned as the benefits of the subsidies for the Turkish manufacturers preclude the UK manufacturer from competing in the UK market with the same product.

## Declaration

This application is made by, or on behalf of, a UK industry that produces like goods to those that are the subject of this application.

This UK industry has at least 1% market share, taking into account the goods and particular market for those goods.

This application has the support of that UK industry as required in the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019. Specifically, producer support for this application is greater than producer opposition and represents at least 25% of all UK production of the like goods.

The information contained in this application:

- provides evidence that goods have been or are being dumped and/or evidence that subsidised goods have been or are being imported into the UK (as per schedule 1(g) and 2(g) of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019);
- provides evidence that the dumped and/or subsidised goods are causing injury to the UK industry (as per schedule 1(i) and 2(i) of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019);
- is sufficient to initiate an anti-dumping and/or subsidy investigation as per schedule 4 paragraph 9(1)(b) of the Taxation (Cross-border Trade) Act 2018; and

- is accurate and complete.

Name:	[Confidential ]
Company/Association:	[Confidential]
Position:	[Confidential ]
Company Registration number (if applicable):	[Confidential ]
Date:	[Confidential ]
Signature:	[Confidential ]

## Checklist

### Important

Please ensure that you have completed this application fully and refer to any attached documents using the corresponding appendix reference.

Complete the checklist above, to demonstrate you have covered all of the points, and attach evidence to support your claims and calculations.

Keep a copy of this application for your reference in case any queries arise when we are assessing the application. You will also need to refer to it if we initiate an investigation.

**X** The details of the UK producers making the application and level of UK industry support for the application

**X** The details of all known UK producers/associations of UK producers of like goods

**X** The volume and value of the domestic production of the like goods both by producers making the application and all other known UK producers

**X** Information that the market share requirement is met

**X** A complete description of the imported goods

**X** The names of countries/territories of origin and export of the imported goods

**X** The details of the exporters or overseas producers of the imported goods

**X** The details of the companies or individuals known to be importing the goods

☐ Normal values of the goods ***Dumping applications only***

☐ Export prices of the goods ***Dumping applications only***

**X** Details of subsidy programmes associated with the imported goods  
***Subsidy applications only***

**X** The amount of countervailable subsidy attributable to the alleged subsidised goods imported into the UK ***Subsidy applications only***

**X** Changes in import volumes of the goods

**X** Effects of the imported goods on prices of like goods produced in the UK

**X** Impact of the imports have caused to the UK industry