



Pre-Sampling Questionnaire (Producer) 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:	6 May 2022
Case Team Contact:	AS0020@traderemedies.gov.uk
Completed on behalf of:	REDACTED

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

- Confidential
 Non-Confidential – will be made publicly available

Please note that you will have to provide **two copies of your response** – a **Confidential** and a **Non-Confidential version**. Both copies should be returned to the TRA using the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **26 April 2022**.



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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

This pre-sampling questionnaire asks for information about your company's imports and sales of goods which are like the **goods concerned**. Any reference to '**like goods**' in this pre-sampling questionnaire refers to goods produced in the UK or imported to the UK from a country other than **Turkey** 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 form of an **alphanumeric code**, help to create a categorisation system so that comparisons can be made between goods produced in the domestic UK market and those produced in foreign markets.



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 ($\geq 115 \leq 125$)
	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.

The proposed PCN structure is acceptable.



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 a **UK producer** 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 UK producers complete this pre-sampling questionnaire, we will use the information each one provides to help us decide which companies we want to sample for further investigation. If you are sampled, we will send you a more detailed questionnaire to complete.

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

II – Who should complete this form

You should complete this form if you are a **UK producer** of **Ironing Boards** ('the **like goods**').

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

III – Deadline for response

A completed pre-sampling questionnaire must be submitted to the TRA by no later than **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> for further information on what can be considered confidential and how to prepare a non-confidential version of this questionnaire.

All information provided to the TRA in confidence will be treated accordingly and only used for this investigation (except in limited circumstance as permitted by regulation 46 of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019) and will be stored in protected systems. The non-confidential version of your submission will be placed on the public file, which is available on www.trade-remedies.service.gov.uk/public/cases.

V – Period of Investigation

The Period of Investigation (POI) referred to in this pre-sampling questionnaire is **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 as an interested party for the purpose of this **investigation**, please select the activity/activities of your company below.

For a definition of **goods concerned** and **like goods** please refer to above section on *‘The scope of this investigation’*.

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

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

Not Applicable

Please describe your interest in this case:

We are a UK ironing board producer.



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](#).

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

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

+ Add additional rows as required



Section B – Production, sales and imports

B1 – Production

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

	Volume <units>
Overall production of the like goods during the POI	The figure has been redacted, as to provide this data would provide confidential commercially sensitive data, to potential competitors of the producer 385,000 to 520,000
Total production capacity of the like goods during the POI	The figure has been redacted, as to provide this data would provide confidential commercially sensitive data, to potential competitors of the producer 735,000 to 990,000



B2 – Sales volume and value

Please provide your UK sales data for the **like goods** produced in the UK by your company.

	Volume <units>	Value in GBP (£)
Like goods produced and sold in the UK in the POI	The figure has been redacted, as to provide this data would provide confidential commercially sensitive data, to potential competitors of the producer 365,000 to 490,000	The figure has been redacted, as to provide this data would provide confidential commercially sensitive data, to potential competitors of the producer 6,350,000 to 8,500,000

B3 – Imports

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

	Volume <units>	Value in GBP (£)
UK sales of the goods concerned , imported from Turkey in the POI	Not Applicable	
UK sales of the like goods , imported from countries other than Turkey in the POI	The figure has been redacted, as to provide this data would provide confidential commercially sensitive data, to potential competitors of the producer 1,275 to 1,700	The figure has been redacted, as to provide this data would provide confidential commercially sensitive data, to potential competitors of the producer 18,250 to 24,500
Imports of the goods concerned from Turkey in the POI	Not Applicable	
Imports of the like goods from countries other than Turkey in the POI	Not Applicable	



Section C - 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 subsidies identified 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**.



See Annex A1, A2 and A3 for details of subsidy benefits.
Annex A1, is an extract taken from Republic of Turkey – Ministry of Trade web site, which shows that the subsidy programme has been established across 18 regions between 1985-2000 and operates today.
Annex A2 is an extract from the current Republic of Turkey – Ministry of Trade web site, which details the 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.
Annex A3 provides a calculation, based on a number of assumptions, of the benefits these subsidies provide to Turkish suppliers.

Section D – 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.

As per the notice of deficiency 10/05/2022 we confirm that the information submitted reflects the timeframes as stated in this submission.

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**.



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Not Applicable