

Questionnaire (Producer)

Case AS0022: Optical fibre cables exported from the People's Republic of China

Period of Investigation (POI):	1 January 2021 to 31 December 2021
Injury period:	1 January 2018 to 31 December 2021
Deadline for response:	05 August 2022
Contact details:	AS0022@traderemedies.gov.uk
Completed on behalf of:	<i>Prysmian Cables & Systems Ltd, (hereinafter "Prysmian UK")</i>

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

- ☐ Confidential
☒ Non-Confidential – will be made publicly available

Your completed response must comprise this questionnaire and the corresponding annex. Please note that you will have to provide a **Confidential** and a **Non-Confidential** version of both the questionnaire and annex, as well as any additional documents you append (guidance on confidentiality is available at: <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/an-introduction-to-our-investigations-process#confidential-information-and-non-confidential-summaries>). All documents should be uploaded to the Trade Remedies Service (www.trade-remedies.service.gov.uk) by 05 August 2022.

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Introduction

About us, this case and this questionnaire

The Trade Remedies Authority (TRA) investigates whether trade remedies are needed to prevent injury to United Kingdom (UK) industry. The TRA has been established to provide the UK with its own independent trade remedies system.

This case is investigating the allegation that optical fibre cables from the People's Republic of China (PRC) are causing injury to producers in the UK because the goods have benefited from a subsidy from a foreign authority.

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.

Not all subsidies are countervailable (meaning they can be offset through trade remedies). A subsidy is countervailable if it is specific to certain companies or industries and granted either directly or indirectly for the manufacture, production, export or transport of goods.

Why should I take part?

The purpose of this questionnaire is to allow the TRA to obtain the information it considers material to the investigation.

We are asking domestic producers to complete this questionnaire to help us understand the industry and market for this product and assess if a measure is needed. We need to establish whether the alleged subsidisation has occurred and has caused injury to the UK industry.

The information your company provides will help us to reach a fair and proportionate decision.

How do I respond?

Detailed guidance on how to complete the questionnaire is provided in the [instructions](#) section below.

Please provide all the information requested by 05 August 2022. We may need to issue a deficiency notice if we determine that the information supplied in the questionnaire is incomplete or inadequate. We may also send a notice requesting clarification or supplementary information if necessary. Therefore, please provide as much detail as possible in your responses.

Where can I find more information?

Our [trade remedies guidance](#) provides general information about our investigations and processes we follow.

If you have any specific questions relating to the case, now or while you're completing the questionnaire, please contact the Case Team at AS0022@traderemedies.gov.uk.

You can also find out more about the regulatory basis of our investigations. The TRA investigates cases under the provisions of *Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 (as amended)* and under the *Taxation (Cross-border Trade) Act 2018*.

Instructions on completing this questionnaire

Preparing your response

This section sets out guidance on how to complete this questionnaire.

If you think you won't be able to complete the questionnaire within the required time, please contact the [Case Team](#) ahead of the deadline using the contact details on the cover of this questionnaire. You should outline the length of extension you need and the reasons why. We will notify you of our decision.

If we can accommodate an extension, we will publish a note on our [public file](#) to record both the request and the extension granted.

How to answer the questions

Please read and follow all the instructions carefully. Your company will need to substantiate all claims with relevant data and information. You may be asked to attach supporting documents in appendices to supplement your responses. To help us verify your information, please retain all these documents, your completed spreadsheet annex and any calculations you made when developing your responses.

Please also note the following points:

- Do not leave any questions blank. If the question is not relevant to your organisation, please explain why. If the answer to a question is "zero", "no" or "none", please write this.
- Please complete the spreadsheet annexes as requested. Annexes are named to correspond to the relevant sections of this questionnaire and must be completed with reference to the instructions provided. If you feel you cannot present the information as requested, please contact your [Case Team](#) as soon as possible.



- Please provide all formulas and calculations used within your questionnaire response.
- If there is insufficient space in any part of the questionnaire to provide the details requested, or we ask for copies of additional information, please submit this information as appendices. Please ensure that any attachments are given a corresponding appendix reference in the title of the document and that these are referenced in the boxes provided.
- Any documents not in English should be accompanied by an English translation.
- Please provide all dates in the format DD/MM/YYYY (e.g. 23/05/2019).
- Unless otherwise stated, 'year' or 'calendar year' refers to the period 1 January – 31 December and 'quarter' refers to the associated three-month periods e.g. 1 January – 31 March, 1 April – 30 June, etc.
- Identify all units of measurement and currencies used in tables, calculations and lists, if not provided by the corresponding instructions, and use units of measurement consistently (e.g. do not use kg and metric tonnes interchangeably).
- For all numerical figures, where appropriate please express every third number with a comma (e.g. '1,300' for one-thousand three hundred, '1,300,000' for one million and three-hundred thousand).
- Please limit all sales/currency/income figures to two decimal places, apply a full point as a decimal separator and use the appropriate currency symbol or abbreviation (e.g. £1,300.00).
- Provide all costing figures as actual amounts. Where actual amounts cannot be provided and you have reported standard costing instead, please indicate this in the relevant answer, and explain the variance from actual costs, if any.
- All figures should be reported net of tax unless otherwise stated.
- Please refer to the case number, AS0022, in any correspondence with the TRA.

Preparing confidential and non-confidential copies

You will need to submit one confidential version and one non-confidential version of your questionnaire and the corresponding spreadsheet annex by the due date. We will publish the non-confidential version on the public file. **Please ensure that each page of information you provide is clearly marked either "Confidential" or "Non-Confidential" in the header.**

Please see our guidance on [how to submit information](#) for further details on what can be considered confidential and how to prepare a non-confidential version of this questionnaire.

In preparing your response, please note the following:

- It is your responsibility to ensure that the non-confidential version does not contain any confidential information.
- Remember to include a statement explaining why information obtained in your response should be treated as confidential e.g. the data is commercially sensitive.



- Provide the source for all information or data you don't own and clearly state any restrictions on sharing it.
- If you do not provide a non-confidential summary (or a statement of reasons why you cannot provide this) each time you provide confidential information, the TRA may disregard the information you give us.

All information provided to the TRA in confidence will be treated accordingly and only used for this investigation (except in limited circumstance as permitted by regulation 46 of the *Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019*) and will be stored in protected systems. The non-confidential version of your submission will be placed on the public file, which is available on www.trade-remedies.service.gov.uk/public/case/AS0022.

Providing information from subsidiaries or associated parties

Section A of this questionnaire includes detailed questions about your company structure. Although this questionnaire is intended for your company, our investigation covers all subsidiaries and any other associated companies involved in the import, production, sale, R&D, distribution and/or supply of the like good and/or goods concerned.

Please note, both natural persons (individuals) and legal persons (e.g. companies) are considered to be associated where they meet the definition of 'Related Persons' in [Regulation 128 of the Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#).

- If any of your subsidiaries or associated companies are also a UK producer of like goods, they should **also** complete a Producer questionnaire. Please make sure you provide your subsidiaries with access to it.
- Where your subsidiaries or associated companies are not producers but are involved in the sales of the like goods, your questionnaire response should include information from those companies.

If you have any queries about this part of the process, please contact the [Case Team](#) using the details provided on the cover of this questionnaire.

What happens next

Once you have completed your questionnaire responses including the corresponding annex(es) and any additional documents requested, you must upload both confidential and non-confidential versions through our [Trade Remedies Service](#).

Following this:

- you will receive an email confirming the documents have been uploaded successfully;
- the Case Team will contact you if further information is required;
- the non-confidential responses will be placed on the public file; and
- the Case Team may contact you to arrange a visit to verify the information contained in your responses.

Verifying the information you supply

We will verify, as far as possible, the information provided to us. As part of this process, we may conduct verification visits. If we need to verify information that you provide by visiting your premises, the Case Team will contact you to arrange this.

Visits can last several days, during which we will want to speak to management and staff to help establish the completeness, relevance and accuracy of the information provided.

Please keep a record of formulas and steps used in your calculations and other related material/documentation as it may be asked for during verification. In some circumstances, verification may be conducted remotely.

Please indicate any dates when you would be unable to host a verification visit.

On the assumption that the verification visit would not take place before October, there are currently no precise dates on which Prysmian UK Would not be available. However, during the month of October - and more generally during each month following the end of a quarter - the accounting department is traditionally very busy with quarter-end closings during the first 2 weeks and would therefore be far more willing to have the verifications during the second part of that month.

Appendix reference:

Once verification is complete, the TRA will prepare a report and share a draft with you. We will then ask you to prepare a non-confidential copy of the report for the public record. If you feel some information in the report should be kept confidential, please provide your reasons for this.



The scope of this investigation

Goods concerned

This investigation covers optical fibre cables exported from the PRC, described as:

Single mode optical fibre cables, made up of one or more individually sheathed fibres, with protective casing, whether or not containing electric conductors. Hybrid cables, which are fitted both with optical fibres and electrical conductors, fall within the product scope of the investigation.

These optical fibre cables are currently classifiable within the following commodity code: 85447000. This commodity code is only given for information.

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

The following products included under commodity code 85447000 are excluded from the scope of the investigation:

- (i) Multimode optical fibre cables.
- (ii) Cables in which all the optical fibres are individually fitted with operational connectors at one or both extremities; and
- (iii) Cables for submarine use - cables for submarine use are plastic insulated optical fibre cables, containing a copper or aluminium conductor, in which fibres are contained in metal modules.

Like goods

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

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

Product Control Numbers



The TRA uses Product Control Numbers (PCNs) to define and distinguish the different types of products that fall under the goods description above.

PCNs, which come in the form of an **alphanumeric code**, help to create a categorisation system so that comparisons can be made between goods produced in the domestic UK market and those produced in foreign markets.

We have created a draft PCN table and enclose this here for you now.

Description	Value	Comments
Type of single mode optical fibre in the cable	A	Type G.652D https://www.itu.int/itu-t/recommendations/rec.aspx?rec=13076
	B	Type G.657 A1 https://www.itu.int/itu-t/recommendations/rec.aspx?rec=13078
	C	Type G.657 A2 https://www.itu.int/itu-t/recommendations/rec.aspx?rec=13078
	D	Type G.654 https://www.itu.int/itu-t/recommendations/rec.aspx?rec=14198
	E	Other types of single mode optical fibre
Number of fibres in the cable	NNNNN	An optical fibre cable with 48 fibres would be marked as 00048
First (innermost) cable jacket	A	polyethylene (PE) + embedded radial strength member (RSM)
	B	polyethylene (PE) sheath
	C	Halogen Free Flame Retardant (HFFR)
	D	Other type of jacket

Example of the PCN

By way of example, for a single-mode fibre of type G.657 A2, with 96 fibres, and an innermost polyethylene (PE) sheath jacket, the PCN would be C00096B.

Technical or physical characteristic of the goods concerned

- Please provide details of any technical or physical characteristic not included in the PCN structure that may affect the price comparison between products.

The PCN encompasses most of the price differences between the types of products. In some rare instances, the diameter of the fibre might have an impact on prices. In other cases, the types of outer jacket(s) and reinforcement structure used may differ



from one type to another within the same PCN and affect prices but, on an average basis, which price variances are generally negligible at a PCN level.

Suitability of the PCN structure

2. Please comment on the suitability of the PCN structure in regard to your product range. This may include areas such as:
- Categorisation of features
 - Number of Products included under “Other” which may exclude a fair comparison
 - Specialised products which may unduly influence the comparison

Prysmian UK agrees with the PCN structure.

Prysmian wishes to address in this section the comments concerning the product scope made by one interested party to this investigation, Mayflex UK, in its reply to the pre-sampling form.

Mayflex UK first argues that, in addition to the fibre to the home market (FTTH), there is a separate so-called Local Area Network (LAN) market where “cabling provides communication pathways for the business/organisations own internal data requirements” (A1). While Mayflex UK seems to express the view that the LAN market “should be considered as part of the scope of this investigation” (A1), it also somehow argues that the LAN market should be excluded from the product scope (B1). The argument put forward by Mayflex UK is that the Application only appears to be focused on the FTTH market and that, these different market applications can be addressed by “considering cable designs/fibreoptic core counts.

Apart from the fact that, in reply to Section D5, Mayflex UK confirms that “the suggested PCN structure makes sense and covers all key aspects of product design”, the proposed market distinction (FTTH – LAN) is totally artificial and meaningless: (1) artificial because there are many types and constructions that are used for fibre to the home and the so-called LAN applications defined by Mayflex UK and (2) meaningless because there is no such distinction in the market. The best example is that a large majority of tenders cover product types that range from as low as 1 to 20 fibre per cable up to over 400 fibres per cable. Likewise, cable designs can be very similar for cables with low fibre count and high fibre count. Any attempt to exclude certain product types on the basis of alleged market distinctions would immediately open the door to widespread circumvention which would dramatically affect the effectiveness of any trade remedy measure.

Mayflex UK also argues that the exclusion under (II) which covers only “cables in which all the optical fibres are individually fitted with operational connectors at one or both extremities” should be extended to cover also “cables in which at least one of



the optical fibres are individually fitted with optical connectors at one or both extremities". This request is absolutely extraordinary because it would, for instance, suffice that a single fibre of an e.g. 200 fibre optical cable were fitted with a single connector at one end to allow an entire coil of optical cables to escape any trade defense measure. By limiting the exclusion to cables for which all the fibres are fitted with optical connectors, the product scope, as currently set, aims at reducing as much as possible the risk of circumvention of a trade remedy measure.

Manufacturing Process

3. Please provide details of any manufacturing process differences which you feel may influence the PCN structure and the price comparison between the goods concerned and the like goods.

Prysmian UK is not aware of any differences in the manufacturing process that might influence the price comparison between the like products and the product concerned imported from China.

SECTION A: Company structure and operations

A1 Identity and contact details

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

Legal name of company:	<i>Prysmian Cables & Systems Ltd</i>
Legal structure (e.g. limited company etc):	<i>Limited company</i>
Year of establishment:	<i>1969</i>
Other operating names:	<i>N/A</i>
Company registration number:	<i>00958507</i>
Registered address :	<i>Chickenhall Lane, S050 6YU Eastleigh (Hampshire), United Kingdom</i>
Name (point of contact):	<i>[Confidential information - Personal information removed]</i>
Position:	<i>[Confidential information - Personal information removed]</i>
Address:	<i>Chickenhall Lane, S050 6YU Eastleigh (Hampshire), United Kingdom</i>



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Telephone No:	[Confidential information - Personal information removed]
Email:	[Confidential information - Personal information removed]
Website:	uk.prysmiangroup.com

2. If you have appointed an external party to act on your behalf in this investigation, please provide their details and attach a letter of authority confirming the TRA should contact them directly:

Name:	Van Bael & Bellis
Address:	Chaussée de la Hulpe 166 – 1170 Brussels
Telephone No.:	+32.2.647.73.50
Email:	rluff@vbb.com ; sross@vbb.com ; aregiec@vbb.com
Confirm they have signed authority to act (Yes/No):	Yes
Appendix reference:	

A2 About your company

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

[Prysmian UK is a producer and distributor of the like goods.](#)
[Confidential business information]

Appendix reference:

2. Please provide details of any changes in the legal form of your business over the past 5 years, for example, mergers, acquisitions and/or sales.

Date	Legal form	Explanation of change
N/A	N/A	N/A

+Add additional rows as required.



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

Prysmian UK requires no authorisation to obtain to produce, sell, or export the like goods.

Appendix reference:

4. List all international production standards (BS / EN etc) your company currently conforms to, for the like good.

*Please see enclosed **Annex A.2.4.***

Appendix reference:

5. State whether your company is a member of any representative organisations. If so, provide a copy of the relevant documentation.

Prysmian UK is a member of (1) the British Cable Association, and (2) INCA (Independent Networks Cooperative Association).

Appendix reference:

A3 Organisational structure

Please answer the questions below about the internal structure of your company and any associations with other companies. Both natural persons (individuals) or legal persons (e.g. companies) are associated where they meet the definition of 'Related Persons' in Regulation 128 of the *Customs (Import Duty) (EU Exit) Regulations 2018*.

1. Please complete **Annex 1 – Associated companies** for your company's worldwide corporate structure and affiliations.
2. Please explain, or demonstrate in a diagram, the legal structure of your company showing the internal hierarchical and organisational structure, all sites/locations and departments which are involved in the production, sales, R&D, supply and distribution of the like goods for domestic and export markets.

*Prysmian UK Group owns 100% of: 1) Prysmian Cables & Systems Limited; and 2) Draka Comteq UK Limited. See **Annex A.3.2.***

Appendix reference: *Annex A.3.2*

A4 Board members and principal shareholders

1. Please complete the table below for any shareholder with >5% holding in the company who also has interest in any organisation related to the production, marketing, administration, and sale of the like good in the UK or the PRC during the POI.

Name	Shareholding in company	Name of Other Companies in which person holds interest	Activity of other companies
<i>Prysmian SpA</i>	<i>100%</i>	<i>N/A</i>	<i>Headquarters</i>
<i>Prysmian UK group</i>	<i>100%</i>	<i>N/A</i>	<i>Holding company</i>

+Add additional rows as required

2. Please complete the table below for any members of the Board of Directors who also has interest in any organisation related to the production, marketing, administration and sale of the like good in the UK or the PRC.

Board of Directors: Prysmian UK group

Name	Position on Board of Directors	Name of Other Companies in which person holds interest	Activity of other companies
[Confidential information - Personal information removed]	[Confidential information - Personal information removed]	<i>N/A</i>	<i>N/A</i>
[Confidential information - Personal information removed]	[Confidential information - Personal information removed]	<i>N/A</i>	<i>N/A</i>
[Confidential information - Personal information removed]	[Confidential information - Personal information removed]	<i>N/A</i>	<i>N/A</i>
[Confidential information - Personal information removed]	[Confidential information - Personal information removed]	<i>N/A</i>	<i>N/A</i>



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+Add additional rows as required

Board of Directors: PCS

Name	Position on Board of Directors	Name of Other Companies in which person holds interest	Activity of other companies
[Confidential information - Personal information removed]	[Confidential information - Personal information removed]	N/A	N/A
[Confidential information - Personal information removed]	[Confidential information - Personal information removed]	N/A	N/A
[Confidential information - Personal information removed]	[Confidential information - Personal information removed]	N/A	N/A
[Confidential information - Personal information removed]	[Confidential information - Personal information removed]	N/A	N/A

+Add additional rows as required

Board of Directors: Draka Comteq

Name	Position on Board of Directors	Name of Other Companies in which person holds interest	Activity of other companies
[Confidential information - Personal information removed]	[Confidential information - Personal information removed]	N/A	N/A
[Confidential information - Personal information removed]	[Confidential information - Personal information removed]	N/A	N/A



[Confidential information - Personal information removed]	[Confidential information - Personal information removed]	N/A	N/A
[Confidential information - Personal information removed]	[Confidential information - Personal information removed]	N/A	N/A

A5 Operational links with other companies or persons

- Complete the table below if your company has established long term agreements with any company/companies located in the UK, the PRC or in third countries for the production (e.g. sub-contracting), supply and sale of the like goods, or other licensing, technical patent or compensatory agreements.

If your company has long-term agreements with other companies for the supply of goods destined for internal sale, e.g. captive use, please provide the contract to demonstrate this.

Prysmian UK understands this question as referring to companies that are not associated with Prysmian UK.

Company name and address	Nature of agreement	Company registration number and place of registration	Appendix Number of contract
N/A	N/A	N/A	N/A

+Add additional rows as required

A6 Accounting practices

- Give the address where your company's accounting records are kept. If records are maintained in different locations, please indicate which records are kept at which location. If records are digital and do not have a physical location, please mark as N/A.

Records address	What records are held?
-----------------	------------------------



<i>Chickenhall Lane, S050 6YU Eastleigh (Hampshire), United Kingdom</i>	<i>All records are held at the same address.</i>

+Add additional rows as required

The vast majority of records of Draka Comteq UK Limited (hereinafter “Draka UK”), a sales company associated to Prysmian UK, are accessible at the premises of Prysmian UK. Where applicable, information relating to Draka Comteq UK Limited will be reported separately in this questionnaire response for verification purposes.

2. Please give the financial year convention your company uses for its accounts (e.g. 1 January – 31 December). If any changes have occurred with respect to this period or in your accounting practices over the last four financial years, please describe these changes.

The financial year is the calendar year for both Prysmian UK and Draka UK. There have been no changes during recent years.

Appendix reference:

3. For your company and any associated parties involved in the production, marketing or sales of your goods, please attach a copy of your annual reports, covering the injury period including the financial statements and audit report.

See enclosed Annexes.

Appendix reference: *Annexes A.6.3.a for Prysmian UK and A.6.3.b for Draka UK*

4. If your accounts are unaudited, please attach a copy of your unaudited financial statements for the injury period 1 January 2018 to 31 December 2021.

N/A

Appendix reference:

5. Please attach a copy of your company's trial balance (in original and spreadsheet form) covering the POI and the most recent financial year. This includes:
- the trial balance which covers the beginning of the financial year to 1 January 2021
 - the trial balance which covers the full financial year including 1 January 2021



- the trial balance which covers the beginning of the financial year to 31 December 2021.

See enclosed Annexes.

Appendix reference: [Annexes A.6.5.a for Prysmian UK and A.6.5.b for Draka UK](#)

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

See enclosed Annexes.

Appendix reference: [Annex A.6.6.a for Prysmian Cabluri Si Sisteme S.A \(Romania\).;](#)
[Annex A.6.6.b for Draka Comteq France SA;](#)
[Annex A.6.6.c for Prysmian Cables Spain SA;](#)
[Annex A.6.6.d for Draka Comteq Slovakia and](#)
[Annex A.6.6.e for the 3 associated fibre suppliers in Italy \(FOS\), France \(Douvrain\) and the US \(Claremont\).](#)

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

See enclosed annex.

Appendix reference: [See Annex A.6.7](#)

8. Please provide a detailed description of your financial accounting system, explaining how sub-ledgers (e.g. costing, debtors, creditors) and other sales or production systems integrate with the general ledger. Please provide a description of how they link to the management accounting system, including any manual interventions. Please also attach:
- your company's chart of accounts;
 - your company's cost centres



Prysmian UK companies have operated using the Enterprise Resource Planning (ERP) system, SAP for more than 20 years. In [Confidential business information], Prysmian UK migrated to a global common SAP platform to drive standardisation across the group.

SAP is used for all business transactions including Order to Cash cycle, Purchased to Pay cycle, Material Movements, General ledger, Treasury, Fixed Asset. All accounting records are maintained in SAP. The production control systems are not SAP modules but are connected to SAP via interfaces. The management reporting comes from the COPA module and is reconciled to the general ledger as part of the period closing procedure.

The UK financial results are submitted into Hyperion and consolidated by HQ.

Appendix reference: *Annex A.6.8.a (chart of accounts) and Annex A.6.8.b (cost centers)*

9. Have you changed your financial policies during the injury period? If so, please explain the changes (including dates and the reasons for them) along with the financial impact of those changes against the like goods.

N/A

Appendix reference:



SECTION B: About your goods

B1 Understanding your like goods

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

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

1. Explain the internal coding system your company uses to classify your range of like goods.

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

All products, including the like product, that are manufactured by Prysmian UK are identified by [Confidential business information]

*There are no specific sales catalogues for the like product, but each individual type has a specific technical data sheet. **Annex B.1.1** contains the technical sheets of the ten most sold cables (representing [60-75%] % of sales in volume during the IP).*

[Confidential business information]

Appendix reference: *Annexes B-1-1(a) to (j)*.

2. Please complete **Annex 2 – PCN comparison**. If your company manufactures a range of like goods, list this information for each individual make and model in the range.

Please see additional notes in the annex for assistance on how to complete it.

*See **Annex 2** of the Excel file.*

3. If there are differences in characteristics within your range of like goods which cause distinguishable differences in price, explain those differences and the effect they have. Attach any evidence you have that is relevant. This could take the form of sales brochures, input costs, research papers or any other relevant documentation.



There are no particular differences other than those highlighted in the explanations provided above before Section A. All products having the same specifications compete in the same way in the tendering process.

Appendix reference:

4. Indicate in the box below any physical, commercial or functional differences between your products and the goods concerned. If these differences cause distinguishable variations in price, explain those differences and the effect they have. Attach any evidence you have that is relevant.

Because the like product and the product concerned compete under identical tender specifications, there are no physical differences. Differences, if any, would more generally depend on the type of service provided, differences in delivery deadlines, etc.

Appendix reference:

5. Please describe all the other products (not including the goods under review) produced or sold by your company in the UK.

Prysmian UK produces connectivity cables, energy cables and other accessories. For a more detailed explanation of these products, please see <https://uk.prysmiangroup.com/>

Draka UK sells mainly other telecom cables (in copper) and accessories.

Appendix reference:

B2 Understanding the UK market

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

Optical fibre cables are used in telecommunications networks in 1) long haul (long distances), 2) metro (within cities) and 3) access networks (to individual homes (FTTH) or larger apartment blocks/building (FTTB). The use/application is always the



same: the transfer of data from the telecom company central office/exchanges to business or individuals.

According to Prysmian's internal estimation, each of the three above-mentioned networks areas represent a third of the market.

Appendix reference:

2. Provide a general description of the nature of competition within the overall UK market for the goods concerned and the like goods.

The UK market is extremely competitive: there are multiple sources of supply both within the UK (several producers) and outside the UK (many EU countries, India, the US, Turkey, China, India, etc).

The UK market is very open to imports but it is currently suffering particularly serious injury especially since the imposition of EU measures. The UK market is a pole of excellence. It has historically been a leader in the development of optical fibre cables and, although it has been able to maintain its leadership until now, the very aggressive pricing policy of Chinese exporting producers which has already led to several closures of UK producers, will also end up seriously disrupting UK's leadership in this sector up to the point where the UK market might end up being supplied exclusively from Chinese imports if protective measures are not taken.

Appendix reference:

3. How price sensitive is demand for the goods concerned and like good? In other words, to what extent will the overall demand for optic fibre cables change in response to changes in price?

Demand is growing on the UK, irrespective of price considerations because of the political agenda. Demand in UK does not depend on price. There is virtually no price sensitivity because demand is fuelled by an ambitious digital political agenda.

Appendix reference:

4. Do consumers buy from the cheapest producer, or are there other factors that influence their decision such as quality and service?

As a general rule, price is – by far – the main criterion for customer choice. In some cases, customers will also value the quality of service and shorter delivery periods, but price remains the most decisive factor (also because the like product and the product concerned are qualitatively equivalent).

Appendix reference:

5. To what extent is it feasible for producers to change their level of production in response to changing market conditions such as increases in prices?



Although Prysmian UK's capacity is in theory limited to [1.5-2.5] million fkm, the production can – to some extent – be adapted to changing market conditions.

[Confidential business information]

Appendix reference:

6. Provide a general description of the trends and drivers of demand within the UK market for the goods concerned and the like goods, including causes of demand fluctuations and any factors contributing to overall market growth or decline.

Because of the current digitalisation speed of the UK market, Prysmian UK expects a two digit growth year after year.

Since the UK market is largely fuelled by a handful of large tenders (e.g., Cityfibre and BT), any delay/acceleration of a tender will have an impact on short term demand fluctuations.

Appendix reference:

7. What are the major distribution and marketing channels within the UK market for the goods concerned and the like goods?

To the best of Prysmian UK's estimations, the two main channels within the UK market are (1) tenders (70%) and (2) distribution (30%). Prysmian UK expects a similar ratio for both like product (UK and non-Chinese originating) and product concerned (Chinese origin).

Appendix reference:

8. Who are the general users/consumers/customers within the UK market for the goods concerned and the like goods?

Customers will ultimately all be telecom operators for optical fibre cables from all origins.

Appendix reference:

9. Do the goods concerned and like goods compete directly with one another?

Yes: the products are the same.

Appendix reference:



10. Provide a general description of any government regulations or tax incentives affecting the production or sale of the goods concerned and the like goods.

N/A

Appendix reference:

11. Provide a general description of developments in technology affecting the characteristics, demand or the production process of the goods concerned and the like goods.

This is a high technology product which is subject to constant technological development and improvement. One of the main areas of R&D concerns the volume of data that can be transferred: there is a technology race to reduce diameter of the cable to fit in ducts (fibre density in cables) or to fit additional fibres in existing cable networks. This also leads to a reduction of the diameter of the fibre (Ex: 250 micron standard, starting selling 200 micron 5 years ago) with obvious impact on the development of the cable.

Appendix reference:

12. Are there any goods which could be substituted for the goods concerned and the like goods?

No substitution is possible.

Appendix reference:

13. Provide a comment on any other factors which influence the market for the like goods and goods concerned (e.g. seasonality).

Seasonality is not a factor affecting demand fluctuation. The biggest drives are (1) normal customer demand driven by the need of increased data flows and (2) governmental policies.

Appendix reference:



SECTION C: Costs and production

C1 Cost to make and sell

1. Please complete **Annex 3 – Cost to make and sell** for the POI for your like goods sold on the domestic market. All figures should be reported net of recoverable tax.
Please see additional notes in the annex for assistance on how to complete

*See **Annex 3** of the Excel file.*

The cost Allocation methodology is the following:

[Confidential business information]

2. Describe the individual components of the costs included in **Annex 3 – Cost to make and sell** and provide detail on how these costs are paid.

Prysmian UK has identified separately the purchases of the main component, fibre, and the other four main materials (which would include):

[Confidential business information]

Appendix reference:

3. If your company is vertically integrated please provide details of how the product cost is transferred from one production process to another (e.g. at cost, internal transfer pricing).

N/A

Appendix reference:

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

[Confidential business information]

Appendix reference: *Annex C.1.4*



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

N/A

Appendix reference:

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

[Confidential business information]

Appendix reference:

7. Please state the cost allocation method used for each cost type listed in **Annex 3 – Cost to make and sell**, including an explanation of the allocation under each subheading and to PCNs.

[Confidential business information]

Appendix reference:

C2 Cost and sales reconciliation

1. Please complete the Cost reconciliation table in **Annex 4 – Cost reconciliation** starting from the bottom of the table and filling in only the white cells. This section will help us reconcile the cost data provided in section **C1 – Cost to make and sell**.

Please see additional notes in the annex for assistance on how to complete it.

See **Annex 4 of the Excel sheet**.

[Confidential business information]

C3 Production process

1. Please provide a written summary and a diagram/flow chart. If applicable, of your production process clearly indicating the different production stages for your like goods carried out by your company.



Detailed information on Prysmian UK's production process is provided in the Application. The relevant parts are reproduced in **Annex C.3.1**.

The manufacture of OFC can be summarised in 5 steps:

1. Fibre colouring, during which ink is applied to the fibre for identification
2. The tubing process, during which a tube is placed around one or more fibre for protection
3. The stranding process, during which the tubes are placed together to create a cable core
4. The sheathing process, during which extra protection is placed around the cable
5. Testing, during which the OFC is measured to the required specifications

Appendix reference: **Annex C.3.1**

2. Identify what parts of your production process take place in the UK and explain at what stage the most value is added to your like goods in the production process. If a production process is performed outside the UK, please explain the nature of the activity and where this process step takes place.

With the exception of the fibre which is supplied by associated parties, the production process of the like product produced takes exclusively place in the UK in Eastleigh.

For an explanation on the production process of the fibre at the Group's facilities in Italy/France), please refer to the Application and to **Annex C.3.2**

An analysis of 2021 production volumes shows that the [Confidential business information] of the optical fibre cable adds the most value to the product.

Appendix reference: **Annex C.3.2**

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

Company name	Physical address
Prysmian Cables & Systems Ltd	Chickenhall Lane, SO50 6YU Eastleigh (Hampshire), United Kingdom

Appendix reference:

+Add additional rows as required

C4 Joint products and by-products



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

[Confidential business information]

The average scrap ratio is around [0-10]%.

Appendix reference:

2. Please identify any products which share a joint process with the goods concerned and/or the like goods which you produce. Please indicate at which point in the manufacturing process the products diverge.

N/A

Appendix reference:

3. Please explain how your costs of production (per unit) differ between the like goods and its joint products, if applicable. Comment on the reason for this difference and explain your method(s) of calculation.

N/A

Appendix reference:

C5 Raw material and input purchases

Please complete **Annex 5 – Raw materials and input purchases**, detailing by supplier, purchases, which account for more than 5% of total cost to make and sell (or if energy more than 1%), used in the production of the like goods during the POI by your company

Please see additional notes in the annex for assistance on how to complete it.

*Please see **Annex 5** of the Excel file.*

Please provide an invoice and any supporting documents for two of your purchases stated within **Annex 5 – Raw materials and inputs**. Use the box below to give an overview of any supporting documents provided.

*See **Annex C.5.2** in which two invoices are provided.*

[Confidential business information]

Appendix reference:



C6 Purchases of like goods and/or goods concerned

1. Complete **Annex 6 – Purchases of the goods**. This should include information relating to your company's total annual purchases of the like goods and/or goods concerned over the injury period for each PCN purchased. All figures should be reported net of tax.

Please see additional notes in the annex for assistance on how to complete it

*See **Annex 6** of the **Excel** file.*

2. Describe how these purchases fit into your business model. Please attach copies of any agreements or contracts that you have relating to your purchases of like goods and/or goods concerned

During the relevant period Prysmian UK purchased the like product from
[Confidential business information]

Appendix reference:

SECTION D: Sales

D1 Domestic sales

1. Please complete **Annex 7 – Transaction by transaction (T by T) domestic sales** and **Annex 8 – Tenders**.

See [Annex 7](#) and [Annex 8](#) of the Excel file.

The term “tender” refers to all types of bidding processes, including open tenders, those conducted by invitation only, any combinations of the two, and all types of auction related to supplying optical fibre cables.

Please contact the [Case Team](#) if you can’t provide the relevant information in sufficient detail.

D2 Export sales

1. Please complete **Annex 9 – Export sales**.
 - These should include all your export sales of like goods for the POI, 1 January 2021 to 31 December 2021.
 - Please ensure that you correctly report your total volume and total value for your export sales per PCN.
 - All figures should be reported net of recoverable tax.

Please see additional notes in the annex for assistance on how to complete it.

See [Annex 9](#) of the Excel file.

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

The associated customers that purchased the like product from Prysmian UK can be found in [Annex 7](#) of the Excel file.

[Confidential business information]

Appendix reference:

D3 Sales reconciliation

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

See [Annex 10](#) of the Excel file.



2. Additionally, please provide quantitative estimates (e.g. projections or forecasts) for the sales revenue and quantity of like goods as well as all other goods you produce on the UK market for the next five years in the Sales Forecast table in **Annex 10 – Sales reconciliation**.

For the period 2022-2025, quantitative estimates of Prysmian's sales, in terms of volumes (fkm) and value, are provided under two scenarios: the first one in the event no AD/AS measures are imposed, and the second one where AD/AS measures are imposed. In addition, figures are provided separately for the optical fibre cable business and the connectivity business.

See **Annex 10** of the Excel file.

D4 Distribution channels and price setting

1. If applicable, please provide copies of price lists for the like goods for the POI, 1 January 2021 to 31 December 2021.

Price lists are not used for this business because products are made according to specific customer technical specifications.

[Confidential business information]

Appendix reference:

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

[Confidential business information]

Appendix reference:

3. Please provide details of your distribution network for like goods if you have one.

[Confidential business information]

Appendix reference:



4. Do your sales usually include delivery in the price? If so please explain how you calculate delivery costs and prices?

[Confidential business information]

Appendix reference:

5. Does delivery price vary between customers? If so, then please explain the what these differences may relate to.

[Confidential business information]

Appendix reference:

6. Attach sales contracts for the top five customers by volume in **Annex 7 – T by T domestic sales** that you have sold like goods to in the POI.

Prysmian's top 5 customers in 2021 are the following:

[Confidential business information]

Appendix reference: *Annexes D.4.6.a to D.4.6.d.*

7. Select examples of domestic sales of like goods to two different customers included in **Annex 7 – T by T domestic sales**. Attach as an appendix a complete set of documentation for these sales. Where possible, include purchase orders, commercial invoices, order acceptances, discounts or rebates, credit and debit notes, contracts of sale, freight and insurance details, bank documentation and all other relevant documents.

See enclosed annex.

Appendix reference: *Annex D.4.7*

D5 Captive use

1. Please complete **Annex 11 – Captive sales and use**. This should include transaction-by-transaction information for the POI, 1 January 2021 to 31 December 2021, detailing your company's individual transfers of the finished like good for internal or captive use. You will need to use the [PCN table](#) to categorise each of these transfers by PCN.

Please see additional notes in the annex for assistance on how to complete it.

N/A



2. Please comment on whether your captive use of the like goods has changed over time and what has caused any changes. Please attach evidence to support your answer where required.

N/A

Appendix reference:

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

*The list of the associated customers that purchase the like goods from can be found in **Annex D.5.3**.*

*Prices are set using the methodology in the Prysmian Transfer Policy (see **Annex E.3**).*

Appendix reference: *Annex D.5.3 and E.3*



SECTION E: Injury to your company

Injury to UK industry as a result of dumped imports could come in the form of:

- material injury to UK industry;
- threat of material injury to UK industry; or
- material retardation of the establishment of such an industry.

Type of injury	Description
Injury, material	Material injury is where there is evidence of the UK industry being injured by the dumped goods.
Injury, material retardation	This is a type of injury in which efforts to establish an industry have been materially hindered because of dumped goods. It may apply where there has been some production but not at sufficient levels to allow us to consider material injury, or where production has not even begun.
Injury, threat of	Injury which has not yet occurred but is clearly foreseen and imminent.

1. Is your company suffering from injury? If so, please describe the nature and degree of the injury. This can relate to the prices, volumes or profits associated with your production and sale of the like goods, or to wider aspects of your business. Please specify and substantiate your claims with evidence.

*As explained in detail in the Application, as well as in **Annex 12** of the Excel file, Prysmian UK has been suffering injury since 2020. The injury suffered by Prysmian can be summarised as follows:*

*First, in absolute terms, the **volume of imports** of the product concerned originating in China increased by 214% between 2018 and the IP. At the same time, the increase in volumes was accompanied by high levels of price undercutting, i.e., an average ranging between 37% to 53% for the four most representative types of optical fibre cables (namely those including 12, 36, 48 and 96 fibres).*

*Second, based on UK statistics, the **average value of imports** of optical fibre cables from China decreased by 32% between 2018 (17,720 GBP/ton) and 2021 (11,939 GBP/ton).*



Third, in relative terms, the **market share** of the Chinese producers increased between 2018 and the IP from 4.3% to 9.4%. This increase took place at the expense of Prysmian UK, which lost [5-10]% of market share in terms of sales over the same period (from [40-50]% to [30-40]%; and [10-20]% from 2019 to the IP. The biggest year-on-year loss of market share (i.e. [5-15]%) occurred between 2020 and 2021 and coincided at a moment in time when the volume of imports from China increased threefold from 175,376 fkm to 535,637 fkm. In terms of market share in terms of production, Prysmian's UK share dropped even more substantially, from [30-40]% in 2018 to [15-25]% during the POI (see column U of **Annex 12** of the Excel file).

Fourth, the estimated **UK consumption** of OFC increased by 42% between 2018 (89,757 ckm) and the IP (127,877 ckm). However, the **production** of Prysmian decreased by [5-15]% between 2018 and the IP, from [40,000-50,000] ckm in 2018 to [35,000—45,000] ckm in the IP.

The abovementioned UK consumption growth, however, mainly benefitted Chinese imports which increased by a staggering 214% over the same period. Due to the increase in Chinese imports, Prysmian UK was unable to take a larger share of domestic growth.

Fifth, in anticipation of fast-growing demand in the UK, and as a result of long-term investments, Prysmian UK was able to increase its total **production capacity** by [35-45]% (from [40,000-50,000] ckm in 2018 to [55,000-65,000] ckm in the IP). However, because of the significant increase in imports from China, production capacity utilisation rates declined between 2018 and the IP from [90-100]% to [60-70]%.

Lastly, as a result of Chinese imports, **profitability** on sales of the like product decreased by nearly [5-15] points from its peak in 2019 ([10-20]%) to the IP ([0-10]%). Notably, between 2020 and 2021, the profitability of Prysmian UK decreased by over [60-80]%, from [10-20]% to [0-10]% (see also E.1.2).

Appendix reference:

2. Please estimate the date when the injury began to affect your company. Explain how it has developed since this date.

As explained above, injury began to significantly affect Prysmian UK since 2020.

Profitability on sales of the like product decreased from [10-20]% in 2019 to [0-10]% in the IP. Between 2020 and 2021, the profitability of Prysmian UK decreased by nearly half, from [10-20]% to [0-10]%, which coincides with the significant volume increase of OFC imports from China (as indicated in the reply to the question above).

Appendix reference:



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

During the injury period, production costs within Prysmian UK have varied somewhat for the following reasons in particular:

[Confidential business information]

Appendix reference: [Annex E-3](#)

4. Please complete **Annex 12 – Injury**. This should be completed in reference to your UK production of the like goods for the injury period, 1 January 2018 to 31 December 2021.

*See **Annex 12** of the Excel file.*

5. Please explain how you calculated and apportioned your average net operating profit after tax (NOPAT) for the like goods

This was done on a turnover basis.

Appendix reference:

6. Please explain how you calculated and apportioned your finance costs (e.g. interest) incurred for the like goods;

This was done on a turnover basis

Appendix reference:

7. Please explain how you assess your stock levels. Please indicate if your stock levels were abnormally high during the injury period. If so, please explain.

*Stock levels are assessed in terms of **[Confidential business information]***

Appendix reference:

8. Please explain how you estimated your percentage of market share for the like goods.

*Prysmian knows the volume of OFC it sells to the main players in the market (e.g., **[Confidential business information]**). Such volumes will correspond to “figure A”, the numerator of the fraction. See **Annex E.8** (an extract of Annex A.2.1 of the Application).*

On the other hand, on the basis of market intelligence, Prysmian has tried to quantify the total volumes purchased by these customers (these volumes can be estimated



on the basis of the number of total home passed). This is figure B, the denominator of the fraction.

*Prysmian market share = A divided by B. See **Annex 12** of the Excel file.*

Appendix reference: [Annex E-8](#)

9. Please explain how you calculated your production capacity and capacity utilisation for the like goods, and the cause of any significant variations n.

[Confidential business information]

Appendix reference: [Annex E.9.](#)

10. Please explain how you set your wages, and the causes of any significant variations.

[Confidential business information]

Appendix reference:

11. Please explain how your total employees involved in the UK manufacture of like goods are split across different sites/locations

Prysmian UK produces the like product in only one site (Eastleigh)

Appendix reference:

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

Prysmian UK considers that a profit level of 18 to 20% is required to carry out its normal business operations and maintain its investment programmes to retain its leadership level in terms of product excellency and innovation. Prysmian considers a profit ratio of 15% to constitute the strict minimum to maintain its market share and carry out the minimum level of investment. Any margin below this level carries the increased risk of delocalization of the entire telecom business of the company, including its equally ambitious targets in the optical cable connectivity sector which cannot develop without a viable business model for the like product. Prior to 2020 when injury started to affect the company's activities, the profit margin was [15-20]%.

Appendix reference:

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



As a result of the extremely strong price pressure caused by Chinese imports that are being offered at heavily depressed prices, it has become impossible for Prysmian UK to set prices at target levels. [Confidential business information]

Appendix reference:

14. Explain any variances between your actual and forecasted budgets over the injury period, with reference to your cash flow statements. Would your forecasted budgets be affected if the existing countervailing measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

[Confidential business information]

Appendix reference:

15. Please complete **Annex 13 – Investments and Return on Investments**.

See Annex 13 of the Excel file.

16. Please provide details of your typical source(s) of finance (e.g. loans, debt, share issues, bond issues etc.) for each category of investment relating to your company-wide investments..

[Confidential business information]

Appendix reference:

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

[Confidential business information]

Appendix reference:

18. Please complete **Annex 14 – Forward sales contracts**. Describe and attach copies of all forward sales contracts/ongoing supply agreements for like goods. Comment on these forward sales contracts – are they a usual way of doing business in your industry? Has there been any variation in the volume and value of forward sales contracts over time? If so, what has caused this variation?

In this industry, most of the sales are made through tenders where prices are set. While quantity estimations are generally set out in these tenders, they are never



committed firmly in advance like a standard forward sales contract. Sales to distributors are equally always done on a spot basis.

Appendix reference:

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

- volume and prices of imports that have not benefitted from a subsidy;
- contraction in demand or changes in patterns of consumption;
- restrictive trade practices of, and competition between, third country and UK producers;
- developments in technology; and
- export performance and the productivity of the UK.

Please substantiate your claim(s) with evidence.

As explained in the Application, the injury suffered by Prysmian UK was caused by substantial undercutting and underselling over an extended period by imports of the product concerned originating in China, combined with a surge in import volumes.

More specifically, the existence of a causal link between the imports of the product concerned from China and the injury suffered by Prysmian UK is demonstrated by the fact that the injury occurred at the same time as dumped imports from China flooded into the UK market.

There are no other factors that could break the causal link between the imports of the product concerned from China and the material injury suffered by the Complaining UK Industry for the following reasons.

First, in relation to volume and prices of imports from other countries – imports from the European Union and the United States are not sold at dumped prices and the volume of these imports is not significant.

Second, the demand for OFC has increased, however, Prysmian UK was unable to benefit from it despite making significant investments.

Third, there are no restrictive measures imposed on the UK by third countries. Fourth, Prysmian UK is at the forefront of technology and a leading company in this respect.

Fifth, concerning export performance, Prysmian UK predominantly focuses on domestic sales.

For the reasons above, it is clear that the injury suffered by Prysmian UK has been caused by dumped imports of OFC originating in China.



Appendix reference:

20. Is your company under threat of injury? If so, please describe the threat, its cause and how the injury is clearly foreseen and imminent.

<i>Prysmian UK is already suffering from injury – see above.</i>
Appendix reference:

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

<i>If trade protective measures are imposed, Prysmian will be able to resume investment in R&D, development and production of the like product and this will also allow it to maintain its ambitious development programme of its connectivity business which is a growing business. Prysmian UK aims to maintain its status as a world leader in innovation in this sector (it currently aims to be the biggest producer of connectorized cables in the entire Prysmian Group and one of the largest producers in Europe.</i>
<i>If no measures are imposed, Prysmian UK's production of the like product will no longer be able to survive, and the entire optical business will likely be transferred to other production site of the Prysmian Group elsewhere in Europe [Confidential business information]. The delocalisation of this business would truly be tremendous loss for the UK industry as a whole.</i>
Appendix reference:



SECTION F: Subsidies

F1 – General

The programmes being investigated are listed 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.

F2 – Grants

The applicant provided evidence that the Government of People's Republic of China (GOC) has directly transferred funds to domestic producers and exporters of the goods concerned. This included:

- Financial reports from a selection of Chinese producers and exporters that report the receipt of government grants targeted at the industry.
- Policy documents which either mention or suggest direct subsidy of the industry in question. Particularly the 'Broadband China Strategy' and article 11 of the related [guidance document](#) which encourages "localities with the capacity to give appropriate subsidies to the broadband network."

Please use this box to provide any further information you have regarding the direct transfer of funds.

In general, all levels of the GOC – central, regional and local – provide direct transfers of funds to encouraged industries, including the OFC industry, which was described in detail in Sections 1-3 of the Application. These direct transfers of funds are in line with centralized policies such as e.g. Made in China 2025 and the 14th Five Year Plan for National Informatization ("14th Five Year Plan").¹

More specifically, 14th Five Year Plan provides useful insight into the development stage of the Chinese broadband network:

"The scale of [China's] information infrastructure is world-leading. The world's largest-scale optical fiber and 4G networks were completed, commercial use of 5G was a leader worldwide, and the Internet penetration rate surpassed 70%. From 2015 to 2020, fixed broadband household penetration rates grew from 52.6% to 96%, mobile broadband user penetration rates rose from 57.4% to 108%. Rural informatization development level disparities clearly shrunk; the proportion of administrative villages and poor villages connected with optical fiber and 4G networks

¹ Final version of the 14th Five Year Plan available [here](#) and in **Annex AS.F1.A** alongside a translation prepared by Stanford Cyber Policy Center available [here](#) and in **Annex AS.F1.B**.



reached 98%. The Beidou-3 global satellite navigation system was put into use.” (p. 6, **Annex AS.F1.A**).

In addition, in relation to digital infrastructure, the 14th Five-Year Plan sets the following main targets.

Figure F1:²

No.	Category	Indicator	2020	2025	Nature
	General development levels	Digital China Development Index	85	95	Expected
1	Digital infrastructure	Scale of netizens (million)	989	120	Expected
2		5G user adoption rate (%)	15	56	Expected
3		1000M and higher-speed optical fiber access users (1000 households)	6400	60000	Expected
4		IPv6 active user number (million)	462	800	Expected

For example, the amount of higher-speed optical fibre access users should increase more than a staggering nine times over five years! The GOC already has or will issue new programmes and policies enabling the OFC industry to reach that target, which will further increase the amount of subsidization.

Among major tasks and focus projects, the 14th Five Year plan includes “Building a Ubiquitous, Intelligent, and Connected Digital Infrastructure System” that includes, among others, plans to:

“Construct ubiquitous intelligent network connection facilities. Accelerate the scale, construction, and application innovation of 5G commercial networks, and implement the 5G application Set Sail action plan. For qualified cities, organize the construction and demonstration pilot of the Gigabit City network, and constantly promote upgrading urban broadband networks to high-speed and intelligence. Comprehensively promote the IPv6 transformation of the national backbone network, metropolitan area network, and access network; deepen the deployment of commercial application IPv6; improve the IPv6 support capacity of terminals; and realize the smooth evolution and upgrading of networks, applications, and terminals to the next generation Internet. We will comprehensively coordinate and promote the transformation of the backbone network, metropolitan area network, and access network IPv6; deepen the

² **Annex AS.F1.A**, p. 14.



deployment of commercial application IPv6, enhance the support capability of terminal IPv6, and realize the smooth evolution and upgrading of networks, applications, and terminals to the next generation Internet. Strengthen research on new network infrastructure and 6G and accelerate the research and development of key technologies such as ground wireless and satellite communication integration and terahertz communication.”³

Since OFC and preforms are recognised by the GOC as high-tech products, every measure (or programme, policy, guideline, strategy) that applies to high-tech products, will therefore apply to OFC and preforms. These measures apply only to high-tech enterprises (“HTEs”) to the exclusion of non-HTEs.

Moreover, in principle, Chinese high-tech enterprises are primarily established in the High-Tech Industry Development Zones with designated support programmes assigned to them by the GOC.

These grants are awarded to support e.g. research & development; construction projects; and social security and wages for employees. Moreover, they are awarded to facilitate purchasing land or electricity.

Some of the programmes offered by GOC are established for the duration of several years, e.g. in Suzhou Industrial Park, “Several Measures of Suzhou Industrial Park on Promoting High-quality Development of Manufacturing Industry” policy entered into force in 2021 and will be valid for 5 years.⁴ For further information please see **Annexes AS.F11.A** and **AS.F11.B**. For example, Tongding received a payment for the acceptance of the 10th batch of Suzhou Municipal Science and Technology Development Plan (Key Industrial Technology Innovation) projects in the amount of RMB 340.000,00 (p. 177, **Annex AS.F5.A.**; p. 176 **Annex AS.F5.B**).

To further substantiate the analysis of long-term policies and programmes of the GOC provided in the Application, additional analysis of recently published annual reports for 2021 was conducted (**Annex AS.F10**). It is clear that the OFC industry continues to receive substantive subsidisation from the GOC. There have been no signs that the GOC intends to decrease the amount of subsidization, and, to the contrary, it has continued to launch new programmes and policies.

For example:

- ZTT received RMB 6.243.764,16 as part of “Special cable project”, (p. 231, **Annexes AS.F3.A.** and **AS.F3.B** – Jiangsu Zhongtian);
- Tongding received RMB 12.480.141,86 for “equipment compensation”, (p. 177, **Annex AS.F5.A.**; p. 176 **Annex AS.F5.B**);

³ **Annex AS.F1.A**, p. 17.

⁴ China Briefing, Incentives and Favorable Policies Available in Suzhou Industrial Park, 16 March 2021, available [here](#) and as **Annex AS.F12**.



- Shenzhen Tefa received RMB 1.723.040,00 for research and development of optical module based on 5G silicon photonics technology (p. 430, **Annex AS.F6.A.** and p. 212, **Annex AS.F6.A.**);
- Etern received RMB 5.756.000,00 for a technical transformation project of new (non-dispersive) single-mode optical fibre preform with an annual output of 300 tons) (p. 218, **Annexes AS.F8.A. and AS.F8.B – Etern (Jiangsu Yongding)**).

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List of Annual Reports 2021:

- 1) **Annexes AS.F2.A. and AS.F2.B – YOFC**
- 2) **Annexes AS.F3.A. and AS.F3.B – Jiangsu Zhongtian**
- 3) **Annexes AS.F4.A. and AS.F4.B – Fiberhome Communication**
- 4) **Annexes AS.F5.A. and AS.F5.B – Tongding**
- 5) **Annexes AS.F6.A. and AS.F6.B – Shenzhen Tefa**
- 6) **Annexes AS.F7.A. and AS.F7.B – Hibeil Kaile**
- 7) **Annexes AS.F8.A. and AS.F8.B – Etern (Jiangsu Yongding)**
- 8) **Annexes AS.F9.A. and AS.F9.B – Huamai**

Appendix reference:

F3 – Loans

The applicant provided evidence that the GOC has provided preferential financing to domestic producers and exporters of the goods concerned. This included:

- The existence of preferential loans for specific industries by State-owned banks, as per article 15 of the [General Rules on Loans](#), as well as the presence of loans that could potentially fall under this category listed in the financial reports of the producers and exporters of the goods concerned.
- The existence of preferential financing through credit lines, such as the [High-tech Enterprise Loan Credit Service Plan](#), targeted at high-tech enterprises, of which producers of the goods concerned are a part. Prior investigations by other authorities have found that in some cases these were provided free of charge to producers.
- The existence of preferential financing through standard corporate bonds that do not reflect market conditions and that target specific favoured industries (including OFCs), as per article 12 (5) of [Regulations on the Administration of Corporate Bonds](#).
- The existence of preferential financing through convertible corporate bonds that do not reflect market conditions, as per article 15 of the [Securities Law of the People's Republic of China](#), and that target specific favoured industries (including



OFCs), as per article 12 (5) of [Regulations on the Administration of Corporate Bonds](#).

- The existence of targeted export contingent loans and credits from the Export-Import Bank of China for high tech industry, as referenced in the financial reports of some exporters of the goods concerned.

Please use this box to provide any further information you have regarding preferential financing.

*As explained in detail in **Section 5.2** of the Application, the Chinese financial system is characterised by the strong position of State-owned banks, which take into consideration criteria other than the economic viability of a project when granting access to finance. In addition, borrowing costs have been kept artificially low to stimulate investment growth and Chinese credit institutions have been granting artificially low interest rates in a large number of cases.*

Encouraged industries, including the OFC industry, have been receiving the following types of loans:

- 1) *Short-term and long-term loans used to finance projects and day-to-day operations or to cover working capital needs.*
- 2) *Loans for the specific purpose of substituting other loans from other banks. The purpose of these loans is to replenish the company's liabilities and to obtain new funds to cover its obligations.*
- 3) *Shareholder loans issued by the China Development Bank.*

An additional analysis of Annual Reports 2021 was carried out. For example, Shenzhen Tefa received RMB 2.000.000,0 as a part of a program operated by the Finance Bureau of Shenzhen Municipality.⁵

Appendix reference:

F4 – Land-use rights

The applicant has presented evidence that land and does not reflect market costs, as per Article 2 of the [Land Administration Law of the People's Republic of China](#), enabling the GOC to provide land at less than adequate remuneration (LTAR) to promoted industries, including producers of the goods concerned.

Please use this box to provide any further information you have regarding the provision of land at LTAR.

*Detailed analysis of purchasing land use rights for less than adequate remuneration ("LTAR") was provided in **Section 5.5.1** of the Application.*

⁵ Annex AS.F6.A, p. 430; and Annex AS.F6.A, p. 212.



China does not permit private ownership of land, which is in line with the socialist economy principles. Land in the cities is owned by the Chinese State, whereas land in the suburban areas is owned to some extent also by the Chinese State, and to some extent by collectives.⁶

The GOC, as the owner of the land, acts as an important actor in the real estate market. In addition, the GOC imposes development restrictions when it grants land use rights to private parties.⁷ Furthermore, because of the fact that the majority of financial institutions are SOEs, it creates a situation, where the GOC is in a position to grant land use rights to encouraged industries on preferential terms.

*To that end, the GOC even grants financial subsidies related to land. For example, Etern received RMB 3.439.338,39 from She Tong Dang Land Financial Subsidy (p. 216, **Annexes AS.F8.A. and AS.F8.B.**).*

Appendix reference:

F5 – Export credits and financing

The applicant provided evidence that the GOC has provided preferential export credit insurance and guarantees to domestic producers and exporters of the goods concerned. This included:

- The Circular of the Ministry of Commerce and the China Export and Credit Insurance Corporation ('Sinasure') on the [Use of Export Credit Insurance to Implement the Strategy of Promoting Trade Through Science and Technology](#) stating that "the highest preferential treatment is given to the insurance rates of products included in the [China High-Tech Products Export Catalogue]," which includes OFCs.
- Financial reports of some exporters of the goods concerned listing the receipt or export credit insurance, issued by the state-owned China Export and Credit Insurance Corporation ('Sinasure'), at what appears to be below market rate.

Please use this box to provide any further information you have regarding the provision of export credits and financing.

*Detailed analysis of export credits and financing was provided in **Section 5.3** of the Application.*

⁶ Wuquan Fa [Property Rights Law] (promulgated by the National People's Congress (NPC), Mar. 16, 2007, effective Oct. 1, 2007), Fagui Quanshu 2-12 (Property Rights Law), available [here](#) and as **Annexes AS.F.11A and AS.F.11B**.

⁷ See Stephen R. Platt, Is China Ripe for a Revolution?, N.Y. TIMES (Feb. 9, 2012), available [here](#) and as **Annex AS.F.12**.



The China Export & Credit Insurance Corporation (“Sinasure”) is a policy-oriented public government body and is 100% owned by the Chinese State.

*For example, Tongding received RMB 77.000,00 in import and export credit insurance incentives (p. 177 of **Annex AS.F5.A.**; p. 176 of **Annex AS.F5.B – Tongding**).*

Appendix reference:

F6 – Provision of goods and services

The applicant has provided evidence of the provision of goods and services at LTAR, including:

- The existence of the preferential provision of power at LTAR, especially in special economic development zones (SEDZ) that may benefit producers of the goods concerned
- The existence of raw materials and inputs at LTAR.

Please use this box to provide any further information you have regarding the provision of goods and services at LTAR.

*Detailed analyses of provision of goods and services for less than adequate remuneration was provided in **Section 5.5.1** of the Application. The following products are provided to the OFC industry at LTAR: (i) preforms (used to manufacture optical fibres); (ii) polymers (used to manufacture polyethylene, one of the main raw materials in the production of OFC); (iii) steel products (used to reinforce or shield certain types of OFC).*

Appendix reference:

F7 – Purchase of goods

The applicant has provided evidence that domestic producers of the goods concerned still benefit from an internal circular from 1998 that orders Chinese telecommunications companies to buy components from domestic sources.

Please use this box to provide any further information you have regarding the purchasing OFCs by Chinese telecommunications companies.

Not applicable.

Appendix reference:



F8 – Preferential tax programmes

The applicant provided evidence that the GOC has forgone or not collected government revenue to the benefit of domestic producers and exporters of the goods, including:

- An Enterprise Income Tax (“EIT”) of 15% instead of the normal 25% for High and New Technology Enterprises, as stated in article 28 of the [Enterprise Income Tax Law of the People's Republic of China](#).
- Accelerated depreciation of instruments and equipment used by High-Tech enterprises for High-Tech development and production, as stated in article 32 of the [Enterprise Income Tax Law of the People's Republic of China](#).
- Tax offset for research and development (“R&D”), as stated in article 4 of the [Announcement on Issues Related to the Pre-Tax Deduction Policy for Enterprise Research and Development Expense](#).
- Exemption from export tariffs.
- Exemption from construction tax.

Please use this box to provide any further information you have regarding preferential tax programmes.

*Detailed analyses of preferential tax programmes was provided in **Section 5.4** of the Application.*

Please note that subsidies obtained in the form of a preferential tax rate or a tax deduction are not included in each company's annual and semi-annual reports as a part of the “total government subsidies” received and reported by these companies.

Appendix reference:

F9 Any other subsidy programmes

Please complete **Annex 15 – Subsidies** providing as much information for each of the subsidies listed as possible. Please substantiate with any evidence if possible.

Add additional lines for any further subsidy you would like the TRA to consider into the relevant tables depending on the type of subsidy it is (i.e. grants, loans etc).



SECTION G: Supplementary questions

G1 Adjustments

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

Central planning and direct involvement of the central, regional and local governments in Chinese economy results in significant market distortions, therefore China cannot be treated as a market-economy country.

Appendix reference:

G2 Economic interest

The economic interest test helps the TRA assess the economic impact of a measure compared to what would happen if it was not imposed. There are six factors which the TRA must consider as part of the economic interest test:

- i) The injury caused by the importation of the subsidised goods to UK industry and the benefits to that industry in removing the injury.
- ii) The economic significance of affected industries and consumers in the UK.
- iii) The likely impact on affected industries and consumers in the UK.
- iv) The likely impact on particular geographic areas, or particular groups, in the UK.
- v) The likely consequences for the competitive environment and for the structure of markets for goods in the UK.
- vi) Other matters that the TRA considers relevant.

The questions in this section will contribute to this assessment. Please provide information broken down by each of your company's UK sites/facilities, where relevant and possible.

G3 Background

1. Please provide any known names, legal addresses and telephone numbers of the following domestic companies:
 - Those that produce optical fibre cables in the UK
 - Those that are involved in the importation, distribution, or sale of optical fibre cables from third countries

See Annex G.1.1.



Appendix reference: [See Annex G.1.1.](#)

2. Please provide an overview of your upstream supply chain for optical fibre cables, (e.g. producers of raw materials). Where possible, please describe the number, location and size of UK producers at each stage.

[See Annex G.1.2.](#)

Appendix reference: [See Annex G.1.2.](#)

3. Please provide an overview of your downstream supply chain. Please indicate who the consumers of optical fibre cables are, which industry and level of trade they relate to and whether they are companies or private individuals. Are optical fibre cables considered to be an intermediate and/or final good?

The ultimate purchasers of the like product are telecom operators. In some cases, sales are made through distributors. These buyers are always companies (not private individuals). The like product is the final good: it is not further processed but rather integrated in a network project.

Appendix reference:

G4 Your company

1. Please complete **Annex 16 – Economic Interest Test**, providing employment figures in full-time equivalents (FTE) for each of your company's UK sites or facilities.

[See Annex 16 of the Excel file.](#)

2. How would these employment figures be affected if a countervailing measure was not imposed? Please substantiate your claims with evidence.

In the absence of countervailing measures, Prysmian UK fears that [Confidential business information].

Appendix reference:

3. How would your domestic sales of optical fibre cables be affected if a countervailing measure was not imposed? Please substantiate your claims with evidence.



*As we can see in **Annex 10** of the Excel file, Prysmian's sales will decrease if antidumping /countervailing measures are not imposed. Sales will decrease because*
[Confidential business information]

The combination of these two elements will have a tremendous impact on Prysmian's profitability in its OFC business.

[Confidential business information]

Appendix reference:

4. How significant is the production of optical fibre cables relative to your company's entire UK production?

The like product accounts for a major proportion of Prysmian UK's telecom business
[Confidential business information]

Appendix reference:



G5 Potential impacts of a measure

1. Please describe how you would expect an increase in the import prices of optical fibre cables to affect each of the following. Where possible, please support your claims with evidence.

- Domestic prices of optical fibre cables

Prysmian UK would hope/expect an increase domestic price to reasonable levels that would allow UK producers, including Prysmian UK, to maintain normal investment rates and current market presence.

Appendix reference:

- Total UK production of optical fibre cables;

Given the very significant expected growth in UK demand, total UK production is expected to increase. Prysmian UK would increase production by maximizing current capacity utilization and by optimising it further. Other UK producers – which generally had a viable production in the past - would either resume production that has stopped in the meantime or increase existing output.

Appendix reference:

- total imports of the goods concerned to the UK; and

Imports into the UK will continue to grow because of the expected increase in demand. The increase in UK production will hopefully allow the UK industry to maintain its market share but, given the very significant increase in demand for the foreseeable future, imports will also need to increase. There are multiple of third country sources where imports can be made at fair prices.

In the best of worlds, if the level of protection is sufficient, the UK industry hopes to be able to regain lost market share by replacing unfair imports with local production.

*For a forecast made by CRU of the size of the UK market in terms of value until 2026, See **Annex G.3.1**. The figures provided by the CRU have been indexed as following:*

	2019	2020	2021	2022	2023	2024	2025	2026
<i>Value of the UK market of single mode optical fibre cable (index)</i>	100	113	172	234	305	363	406	437



Appendix reference: [Annex G.3.1](#)

- total exports of optical fibre cables from the UK.

If adequate measures are imposed, the UK production industry will regain viability and become more productive (notably through economies of scale), thereby creating a strong potential to increase its exports to third countries, especially in niche types of the like product.

Appendix reference:

Do you know of any related industries that would be affected if a countervailing measure was not imposed?

Please consider in particular:

- upstream industries – those who produce inputs (such as raw materials) needed for optical fibre cables

Increased production in the UK will undoubtedly also increase the need for raw materials that are commonly supplied in the UK (such as Pentre (Drums)).

Appendix reference:

- downstream industries – those who purchase optical fibre cables

Optical cable fibres are an end product. The customers are telecom networks which integrate them in large projects and will automatically reflect any price increase in the project value. The impact is negligible because the like production generally only represents a very small portion of the entire project. On average, OFC represents only about 5% of the total network project cost (see recital 605 of [EU Regulation 2021/2011](#)).

Appendix reference:

- industries for complimentary goods – those which would typically be bought alongside optical fibre cables (such as ink being bought with printers)

[Confidential business information]

Appendix reference:

- industries for substitute goods – those which might be bought instead of optical fibre cables (such as margarine instead of butter).

There are no substitutes for the product under investigation.



Appendix reference:

2. To what extent would you expect any changes in prices for optical fibre cables to be passed onto final consumers?

Any price increase will be passed on to the customer because of market demand. The impact of a price increase of OFC on total cost of a telecom network project will likely be marginal because OFC generally represent on average not more than 5% of the total network project cost (see recital 605 of [EU Regulation 2021/2011](#)).

Appendix reference:

3. Would your plans for investment or expansion in the UK over the next five years be affected if a countervailing measure was not imposed? Please support your claims with evidence.

Yes, investment will certainly increase in line with market demand. [Confidential business information]

Appendix reference:

4. As a public body, the TRA has an obligation under the Equality Act 2010 to ensure that the possible effects of its activities on different people are considered. This public sector Equality Duty covers the following protected characteristics:

- age,
- disability,
- gender reassignment,
- marriage or civil partnership,
- pregnancy and maternity,
- race,
- religion or belief,
- sex, and
- sexual orientation.

Please provide any relevant information about whether the imposition of a countervailing measure might disproportionately affect any of these groups or any other particular group.

N/A

Appendix reference:

5. Please explain whether and how imposing a trade remedy measure could affect the number or range of suppliers in the optical fibre cables market.



Trade measures will unlikely affect the number of suppliers. In the EU, the imposition of trade measures in October 2021 has not prevented the continued imports of the product concerned from China at sizeable quantities.

As a matter of fact, the protection of the UK market against unfair imports from China will likely increase the number of UK producers.

Appendix reference:

6. Please explain whether and how imposing a trade remedy measure could affect suppliers' ability to differentiate their products by price, quality, service or innovation in the optical fibre cables market.

Suppliers would not be affected. By restoring a fair level playing field in terms of prices, suppliers will have a better ability to differentiate themselves in terms of quality, innovation, service etc.

Appendix reference:

7. Please explain whether and how imposing a trade remedy measure could affect the cost of switching between suppliers in the optical fibre cables market.

Since all the types of this product have standard specifications that must be met by any supplier competing on the market, there are no measurable costs for switching between suppliers. At any time, a customer can switch suppliers.

8. Please explain whether and how imposing a trade remedy measure could enable suppliers to set agreed prices between themselves or for certain consumers or products.

The imposition of trade measures will not increase in any way anti-competitive practices because the market will remain open to imports from a wide variety of sources including from China. On the contrary, trade measures will – inter alia – help to restore a level playing field by reducing the negative effect of highly subsidized and dumped products from unfairly competing with normal market forces in a highly competitive environment.

9. Please explain whether and how imposing a trade remedy measure could affect the cost of switching between suppliers in the optical fibre cables market.



Since all the types of this product have standard specifications that must be met by any supplier competing on the market, there are no measurable costs for switching between suppliers. At any time, a customer can switch suppliers.

10. Please explain whether and how imposing a trade remedy measure could affect choices of optical fibre cables available to consumers.

As already explained above, any trade remedy measure is unlikely to affect in any measurable way the final customer given the low impact of the cost of optical fibre cables in a telecom network project. Also, if any, the imposition of trade measures will increase the availability of suppliers to customers as it can be expected that historical UK producers may decide to resume production in the UK.

Appendix reference:

11. Please explain whether and how imposing a trade remedy measure could affect the ability of consumers to make informed decisions.

For the reasons explained above, Prysmian UK does not expect consumers which are all large corporations with a high degree of expertise and professionalism to be affected in their ability to make informed decisions.

Appendix reference:

12. Are there any additional economic factors that you consider to be relevant for the economic interest test in this investigation?.

N/A

Appendix reference:



SECTION H: Next steps

Next steps

The questionnaire, spreadsheet annex and any appendices should be submitted through the Trade Remedies Service (www.trade-remedies.service.gov.uk) by 05 August 2022. The checklist in Section I of this questionnaire may help ensure your submission is complete.

A confidential and non-confidential version of the questionnaire and spreadsheet annex(es) must be submitted. You can find guidance on how to complete confidential and non-confidential versions in our guidance on [how to submit information](#).

SECTION I: Checklist and appendices

This section is an aid to ensure that you have completed all sections of this questionnaire.

Section	Please tick if you have responded to all questions
Section A – Company structure and operations	X
Section B – About your goods	X
Section C – Costs and production	X
Section D – Sales	X
Section E – Injury to your company	X
Section F – Subsidies	X
Section G – Supplementary questions	X

+Add additional rows as required

Please list any appendices that you have referenced in your responses and are attaching with this questionnaire.

Appendix reference	Document title
Annex A.2.4	List of standards applicable to optical fibre cables
Annex A.2.5(a)	British Cable Association members
Annex A.2.5(b)	Independent Networks Cooperative Association members
Annex A.3.2	Organisation Chart of the Prysmian UK group
Annex A.6.3.a	Prysmian Cables & Systems, Annual Report and Financial Statements for the Year ended 31 December 2018
Annex A.6.3.a	Prysmian Cables & Systems, Annual Report and Financial Statements for the Year ended 31 December 2019
Annex A.6.3.a	Prysmian Cables & Systems, Annual Report and Financial Statements for the Year ended 31 December 2020
Annex A.6.3.a	Prysmian Cables & Systems, Annual Report and Financial Statements for the Year ended 31 December 2021
Annex A.6.3.b	Draka Comteq UK Limited, Annual Report and Financial Statements for the Year ended 31 December 2018



Annex A.6.3.b	Draka Comteq UK Limited, Annual Report and Financial Statements for the Year ended 31 December 2019
Annex A.6.3.b	Draka Comteq UK Limited, Annual Report and Financial Statements for the Year ended 31 December 2020
Annex A.6.3.b	Draka Comteq UK Limited, Annual Report and Financial Statements for the Year ended 31 December 2021
Annex A.6.5.a	Prysmian Cables & Systems, Trial balance 2021
Annex A.6.5.b	Draka Comteq UK Limited, Trial balance 2021
Annex A.6.6.a	Prysmian Cabluri Si Sisteme S.A., Management Report 2021
Annex A.6.6.b	Prysmian Câbles et Systèmes France, Management Report 2021
Annex A.6.6.c	Prysmian Spain SA, Management Report 2021
Annex A.6.6.d	Prysmian Kablo SRO, Management Report 2021
Annex A.6.6.e	Draka Comteq France, Management Report 2021
Annex A.6.6.e	Fibre Ottiche Sud (FOS), Management Report 2021
Annex A.6.6.e	Prysmian Cables and Systems USA LLC, Management Report 2021
Annexes A.6.7(a) to (d)	Prysmian Group Annual reports 2018, 2019, 2020 and 2021
Annex A.6.8a	Chart of Accounts
Annex A.6.8b	Cost centres
Annexes B.1.1(a) to (j)	Most sold types of optical fibre cable by the Prysmian UK group
Annex C.1.4	Transfer Policy for 2021
Annex C.3.1	OFC manufacturing process
Annex C.3.2	Fibre manufacturing process
Annex C.5.2	Example of an invoice

Annex C.5.2	Example of an invoice
Annex D.4.6.a	Prysmian agreement with a customer
Annex D.4.6.b	Prysmian agreement with a customer
Annex D.4.6.c	Prysmian agreement with a customer
Annex D.4.6.d	Prysmian agreement with a customer
Annex D.4.7	Examples of domestic sales
Annex D.5.3	Associated customers
Annex E.3	Transfer Policy (2018-2021)
Annex E.8	Estimated UK market size according to Prysmian data
Annex E.9	Prysmian UK's production capacity
Annex E.17	Internal email concerning investments
Annex AS.F1.A	the 14th Five Year Plan
Annex AS.F1.B	Translation of the 14th Five Year Plan
Annex AS.F2.A	Annual Report YOFC
Annex AS.F2.B	Annual Report YOFC
Annex AS.F3.A	Annual Report Jiangsu Zhongtian
Annex AS.F3.B	Annual Report Jiangsu Zhongtian
Annex AS.F4.A	Annual Report Fiberhome Communication
Annex AS.F4.B	Annual Report Fiberhome Communication
Annex AS.F5.A	Annual Report Tongding
Annex AS.F5.B	Annual Report Tongding
Annex AS.F6.A	Annual Report Shenzen Tefa
Annex AS.F6.B	Annual Report Shenzen Tefa

Annex AS.F7.A	Annual Report Hibeil Kaile
Annex AS.F7.B	Annual Report Hibeil Kaile
Annex AS.F8.A	Annual Report Etern (Jiangsu Yongding)
Annex AS.F8.B	Annual Report Etern (Jiangsu Yongding)
Annex AS.F9.A	Annual Report Huamai
Annex AS.F9.B	Annual Report Huamai
Annex AS.F10	Analysis of recently published annual reports for 2021
Annex AS.F11.A	Property Rights Law (CN)
Annex AS.F11.B	Property Rights Law (EN)
Annex AS.F12.A	China Briefing, Incentives and Favorable Policies Available in Suzhou Industrial Park
Annex AS.F12.B	Is China Ripe for a Revolution – NY Times Article
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