



Anti-Dumping and Countervailing Duties Questionnaire (Downstream)

Cases TD0008 and TS0009: Continuous filament glass fibre products originating in the People's Republic of China

Period of Investigation (POI):	1 January 2020 – 31 December 2020
Injury period:	1 January 2017 – 31 December 2020
Deadline for response:	14 th August 2021
Contact details:	Anti-dumping: TD0008@traderemedies.gov.uk Countervailing duties: TS0009@traderemedies.gov.uk
Completed on behalf of:	Filon Products Ltd

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

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

Your completed response must comprise this questionnaire and the corresponding annex. Please note that you will have to provide a **Confidential** and a **Non-Confidential** version of both the questionnaire and annex, as well as any additional documents you append. All documents should be uploaded to the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **10th May 2021**.

Please remember to upload this dumping and countervailing duties questionnaire to **both cases** on the Trade Remedies Service (www.trade-remedies.service.gov.uk). The Trade Remedies Investigation Directorate is investigating each case separately and you will not be able to participate in both if only one is uploaded.

Table of Contents

Introduction	1
Preparing confidential and non-confidential copies.....	3
Providing information from subsidiaries or associated parties	4
What happens next.....	4
The scope of this review.....	6
Goods subject to review	6
Like goods	6
Downstream products	6
SECTION A: Company details.....	8
A1 Identity and contact details.....	8
A2 About your company	8
SECTION B: Purchases and use of the goods	10
SECTION C: Impact of measure.....	11
SECTION D: Next steps and declaration	14
Next steps	14
Declaration.....	14



Introduction

About us, this case and this questionnaire

The Trade Remedies Investigations Directorate (TRID) of the UK's Department for International Trade investigates whether trade remedies are needed to prevent injury to UK industry.

TRID was established within the Department for International Trade in March 2019 to give the UK its own independent trade remedies system. Once the Trade Bill has passed through Parliament and received Royal Assent, the Trade Remedies Authority (TRA) will be established as an independent Arm's Length Body, taking over the functions exercised by TRID.

As part of our work, we are carrying out a transition review of each trade remedy measure active under the EU system that the United Kingdom (UK) has decided to maintain after EU exit.

TRID will be carrying out a transition review of each trade remedy measure active under the EU system that the UK has decided to maintain after EU exit. This transition review will consider whether the measure is necessary or sufficient to offset the dumping/subsidy amount and whether there would be injury to the UK industry if that amount was revoked.

Why should I take part?

You have received this questionnaire because your company has been identified as a downstream user or consumer of continuous filament glass fibre products. We are asking you to complete it to help us understand the economic impact of imposing, or not imposing, measures. The information your company provides will help us to conduct the Economic Interest Test.

How do I respond?

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

Please complete as much of this questionnaire as you can by 10th May 2021. We may contact you again to ask for clarification or supplementary information if necessary. Please provide the source for all information or data not owned by yourselves and clearly state any restrictions on sharing it.

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 TD0008@traderemedies.gov.uk (Anti-dumping) or TS0009@traderemedies.gov.uk (Countervailing).

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 rather than leaving the answer blank.
- 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, TD0008 (Anti-dumping) or TS0009 (Countervailing duties) in any correspondence with TRID.

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 annexes by the due date. We will publish the non-confidential version of your information on our public file. **Please ensure that each page of information you provide is clearly marked either "Confidential" or "Non-Confidential" in the header.**

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

In preparing your response, please note the following:

- It is your responsibility to ensure that the non-confidential version does not contain any confidential information.
- Remember to include a statement explaining why information obtained in your response should be treated as confidential e.g. the data is commercially sensitive.
- Provide the source for all information or data you don't own and clearly state any restrictions on sharing it.
- If you do *not* provide a non-confidential summary (or a statement of reasons why you cannot provide this) each time you provide confidential information, TRID may disregard the information you give us.



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

Providing information from subsidiaries or associated parties

Our investigation covers all subsidiaries and any other associated companies. If any of your subsidiaries or associated companies also form part of the upstream supply chain of the like goods or goods subject to review, they should contribute to your responses to this questionnaire. If you have any queries, please contact the Case Team using the details provided on the cover of this questionnaire.

Please note that 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 you have any queries about this part of the process, please contact the Case Team using the details provided on the cover of this questionnaire.

What happens next

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

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



The scope of this review

Goods subject to review

Trade remedies are measures designed to address unfair trading practices which mean imports from overseas cause injury to UK industry. Measures generally take the form of a tariff payable on imports.

This review covers continuous filament glass fibre products exported from the People's Republic of China, described as:

- chopped glass fibre strands, of a length not more than 50 mm;
- glass fibre rovings, excluding glass fibre rovings which are impregnated and coated and have a loss on ignition of more than 3% (as determined by the ISO Standard 1887); or,
- mats made of glass fibre filaments excluding mats of glass wool.

originating in The People's Republic of China, destined for consumption in the UK. These continuous filament glass fibre products are currently classifiable within the following commodity codes (CN codes):

- 7019 11 00
- ex 7019 12 00 (TARIC codes 7019 12 00 22, 7019 12 00 25, 7019 12 00 26, 7019 12 00 39)
- 7019 31 00.

These commodity codes are only given for information.

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

Like goods

In addition to the '**the goods subject to review**', we want to know about '**like goods**'. Any reference to '**like goods**' in this questionnaire refers to goods which are like the goods subject to review in all respects, or with characteristics closely resembling them, produced by countries other than The People's Republic of China (including the UK) and sold in the UK.

Downstream products



While downstream products will not be covered by any trade remedy measure that we decide to maintain in this review, we need information about them to conduct the Economic Interest Test. The aim of the Economic Interest Test is to assess if the application of a possible trade remedy measure is in the economic interest of the UK, considering effects on wider industries as well as the directly affected UK industry. When conducting the Economic Interest Test we will consider the:

- Injury caused to UK industry by the imports under review and benefits to that industry of removing the injury,
- Economic significance of affected UK industries and consumers,
- Potential effect of the trade remedy measure on industries and consumers,
- Potential effect on particular geographic areas or groups within the UK,
- Potential consequences for the competitive environment and the structure of UK markets for these goods, and
- Other factors that we consider relevant.

You can find more information about this in our [guidance on the Economic Interest Test](#).

When assessing if a measure is in the economic interest of the UK, we will consider the effect this measure is likely to have on domestic downstream industries. We are interested in any company which:

- Is based in the UK and uses UK-produced like goods;
- Is based in the UK and uses the goods subject to review;
- Is based in the UK and uses like goods produced in third countries (a country other than the UK or The People's Republic of China).

We would also appreciate any information you have on your purchases of the like goods and goods subject to review.

When completing this questionnaire, please provide the data we ask for about your company's products which use the like goods or goods subject to review. If your company is involved in any other part of the supply chain or production of the goods subject to review please contact the Case Team for advice on how to proceed.



SECTION A: Company details

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:	Filon Products Limited
Legal structure (e.g. limited company, sole trader, partnership etc):	Limited company
Year of establishment:	1957
Other operating names:	
Name (point of contact):	[REDACTED]
Position:	[REDACTED]
Address:	Unit 3 Ring Road, Zone 2 Burntwood Business Park, Burntwood, Staffordshire, England WS7 3JQ
Telephone No:	[REDACTED]
Email:	[REDACTED]
Website:	www.filon.co.uk

A2 About your company

1. Please describe the role of your company in the UK market or supply chain for the like goods and/or goods subject to review (e.g. distributor or end user). Furthermore, please provide details on how your company uses these goods.

We are a manufacturer of GRP (Glass Reinforced Polyester) products for building and construction, primarily rooflights.

We use both glass fibre and glass mats as part of our production process.

[Details about our suppliers are confidential]

Appendix reference:

2. If you use the like goods and/or goods subject to review as a component or input to production, please specify the product you manufacture using them.



The main categories of product we manufacture using the goods are:

- Roofing and cladding sheets – profile GRP sheeting, available in either translucent or opaque. Primarily used for rooflights, but also used for wall cladding and over-roofing.
- Valley troughs – GRP valley troughs to be used as alternative to traditional lead roof gutters.
- Flat sheeting – flat GRP sheeting, used for traffic signs and flat roofing applications.
- Flat roof trims – GRP trims to be used with GRP roofing systems.

Appendix reference:

3. Please complete **Annex A2.3 UK site information** for your company's 10 largest sites in the UK (by number of employees) that are involved in the supply chain for the like goods and/or goods subject to review. For the Period of Investigation (POI, 1 January 2020 to 31 December 2020) and the 12 months preceding it, please provide:
- the site's full address,
 - the nature of the site (for example, administration, distribution, or production),
 - the number of employees based at the site (as full time equivalent),
 - median annual gross wages (if you are unable to provide median annual gross wages, please provide mean annual gross wages and note this in the annex).
4. Please list any changes relating to the purchase, distribution and/or use of the like goods and/or goods subject to review since the start of the POI (for example any change in the price, origin of supply, or use).

There were no substantial changes during the POI.

Appendix reference:

2. Please provide your company's annual EBIT figures, as a total and as a percentage of total revenue (for the POI and the 12 months preceding it), using **Annex A2.5 Net profit**. Please provide copies of your company accounts covering this period as evidence.

See appendix and accounts filed at Companies House

Appendix reference: A.2.5

5. If your company has corporate or structural links or agreements with any domestic producers, importers, foreign producers, exporters, distributors, suppliers of raw materials used to manufacture the like goods and/or goods subject to review, or customers that buy the like goods and/or goods subject to review, either in the UK or elsewhere in the world, please use **Annex A2.6**



Association to list their names and addresses and indicate the nature of the association and their role in the supply chain.



SECTION B: Purchases and use of the goods

1. Please use **Annex B.1 Purchases by origin** to indicate your company's sources of the like goods and/or goods subject to review, and any other potential sources of the like goods and/or goods subject to review that you did not use during the POI and the 12 months preceding it. Where possible, please append a proof of purchase, such as an invoice, for one transaction with each company you have bought from.

See appendix

Appendix reference: B.1

6. How do domestically produced like goods compare to imported goods in terms of:
- price,
 - distribution channels, and
 - other non-price factors (such as product quality, lead and delivery times, reliability of supply, grade of material)?

Please identify and explain any differences between the goods subject to review imported from The People's Republic of China and imports from other countries.

We are not aware of any domestic producers of the goods that are suitable for our production process.

There are no substantial differences between the goods from the PRC and elsewhere. PRC can offer a higher quality product which is required for a specific market of ours.

Appendix reference:

7. Please use **Annex B.3 Products sold** to provide a description of each good sold by your company which uses the like goods and/or goods subject to review as an input. Please consider average sales price per unit and profit per unit. If your company is a manufacturer, please indicate what proportion of production costs are attributable to the like goods and/or goods subject to review.
8. Please use **Annex B.4 Customer information** to provide a description of your main customers for each of the goods listed in **Annex B.3 Products sold**, providing their location and the nature of their business where possible.
9. Please state your company's total sales revenue for the POI and the 12 months preceding it for each product you sell which is a downstream product of the like goods and/or goods subject to review, using **Annex B.5 Total sales revenue**.



SECTION C: Impact of measure

1. How would your company and industry be affected if the existing anti-dumping and/or countervailing measures on the goods subject to review were to no longer apply?

We would be better able to compete with foreign imports of finished goods.

Appendix reference:

10. Would the employment figures provided in question A2.3 be affected if the existing anti-dumping/ countervailing measures were to no longer apply? Please provide supporting evidence if possible, as well as estimates (e.g. projections or forecasts) for future years with an explanation of how they have been calculated.

[employment details are confidential]

Appendix reference:

11. Would your company's wages be affected if the existing anti-dumping/ countervailing measure were to no longer apply? Please provide supporting evidence if possible, as well as estimates (e.g. projections or forecasts) for future years with an explanation of how they have been calculated.

[employment details are confidential]

Appendix reference:

12. Would your plans for future UK investment or expansion be affected if the existing anti-dumping/ countervailing measures were to no longer apply? If so, please provide detail by location with any supporting evidence.

[expansion plans are confidential]

Appendix reference:

13. Please describe how you would expect the following to be affected if the existing anti-dumping and/or countervailing measures on the goods subject to review were to no longer apply:

- market price of the like goods in the UK;
- total UK output of the like goods;
- total imports of the goods subject to review to the UK; and
- total exports of the like goods from the UK.



Where possible, please support your answer with any evidence or estimates of impacts.

[future plans are confidential]

Appendix reference:

14. How might the continuation of a trade remedy measure affect:

- the number and range of suppliers of like goods and/or goods subject to review,
- the ability of suppliers of like goods and/or goods subject to review to compete,
- the incentives for suppliers of like goods and/or goods subject to review to compete vigorously,
- the choices and information available to UK consumers?

Please provide any evidence you have that can support your answer as an appendix.

If the current trade remedy measure continued, then there would be no change to any of the points listed.

We are aware however that plant refurbishments planned in Europe over the next 18 months will be impacting supply.

Appendix reference:

15. From your company's perspective are there any other factors that might have negatively affected domestic industry other than the importation of the goods subject to review during the POI? If so, please elaborate.

The lockdown relating to the pandemic affected domestic industry due to many building sites being closed throughout Q2.

Appendix reference:

16. How much of any increase in price for the goods subject to review would you expect to be passed through to the price you pay for them, and to the price for end users in the supply chain?

[pricing information is confidential]

Appendix reference:

Would any other industries, markets or products be affected if the existing anti-dumping and/or countervailing measures on the goods subject to review were to no longer apply?



Many industries will be affected, as glass fibre is widely used.

Appendix reference:

17. Please describe the nature and degree of any impacts on particular geographic areas or groups that you would expect if the existing anti-dumping and/or countervailing measures on the goods subject to review no longer applied.

Unknown.

Appendix reference:

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

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

If you have any information that could assist us in our consideration of whether the continuation of the existing anti-dumping/ countervailing measures might disproportionately affect any of these groups, please provide it in the box below.

Not applicable.

Appendix reference:

19. If there are any additional economic factors that you think may be relevant for the Economic Interest Test in this review, please provide details here and any supporting evidence you have.

Unknown.

Appendix reference:



SECTION D: Next steps and declaration

Next steps

Once you have completed all parts of the questionnaire, the declaration below should be signed by an authorised official of your company. Please submit this questionnaire and any other additional submissions you consider relevant for this transition review through the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **14th August 2021**.

Please submit both a confidential and non-confidential version of the questionnaire. Further information on what can be considered confidential and how to prepare a non-confidential version of this questionnaire can be found in our guidance on [how we handle confidential information](#).

Declaration

By signing this declaration, you agree that all information supplied in this questionnaire is complete and correct to the best of your knowledge and belief and understand that the information submitted may be subject to verification by TRID.

Company name:

4th August 2021

Date

[REDACTED]

Signature of authorised official

[REDACTED]

Name and title of authorised official