

Anti-Dumping Questionnaire (Downstream Industries)

Case TD0014: Heavy Plate exported from The People's Republic of China

The purpose of this questionnaire is to gather information for the Trade Remedies Authority (TRA) review into Heavy Plates from The People's Republic of China. The products we are investigating are:

Flat products of non-alloy or alloy steel (excluding stainless steel, silicon-electrical steel, tool steel and high-speed steel), hot-rolled, not clad, plated or coated, not in coils, of a thickness exceeding 10mm and of a width of 600mm or more or of a thickness of 4.75mm or more but not exceeding 10mm and of a width of 2.05m or more.

These goods are currently classifiable within the following CN code(s) 72 08 51 20 10, 72 08 51 91 10, 72 08 51 98 10, 72 08 52 91 10, 72 08 90 20 10, 72 08 90 80 20, 72 25 40 40 00, 72 25 40 60 10, 72 25 99 00 45. These 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.

These products are currently subject to an anti-dumping duty when imported from The People's Republic of China. Our investigation may result in this measure being maintained, changed or removed. Further information regarding the investigation can be found on the public file: [public file](#).

Your responses will help us to determine whether changes to measures on this product would affect organisations that buy and sell Heavy Plates in the UK. *Please note that we are interested in hearing from you even if you do not source Heavy Plates from The People's Republic of China.*

Please note that you will need to provide both confidential and a non-confidential version of the questionnaire. This is so that we can publish the non-confidential version of your information on our public file. This enables parties involved in a case to view and understand the evidence being considered and would give them an opportunity to defend their own interests.

Where you consider information to be confidential please provide a non-confidential summary of the information or, where that is not possible, a statement explaining why the information should be treated as confidential, and why it cannot be summarised. See our guidance on [How we handle confidential information](#) for details of how to prepare your non-confidential version.

Please submit both versions through the [Trade Remedies Service](#) by 11 April 2022.

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

If you have any questions or difficulties in completing the questionnaire, please contact the Case Team at TD0014@traderemedies.gov.uk.

Many thanks for your cooperation.

Information about your company

1. Please provide some information about the products sold by your company, including:
 - o any product(s) that your company produces/sells using Heavy Plates;
 - o finished products that are made using Heavy Plates; and
 - o customers of these finished goods.

Note: finished products are those purchased by end users and customers.

30 x Complete Wind Turbine Towers (comprising of 9232 MT of Heavy Steel Plate within 90 x individual Tower Sections)
Customer : **Confidential Info**

2. Please provide the number of employees for each of your company's 10 largest UK sites (by number of employees).

Site Address	Number of Employees (FTE*)	Is this site linked to the production, sales, or supply of any product(s) that use Heavy Plates? Y/N
Head Office HU9	998	Y – for Sales of complete Onshore & Offshore Wind Farm Solutions only.
GU15	67	N
DN31	64	N
NR32	37	N
CH8	33	N
ST5	31	N
ML4	28	N
S3	16	N
G2	11	N
CO12	10	N

Information relating to sales

3. Please provide the quantity and value of sales in the last financial year for those products listed above which use or incorporate Heavy Plates. Please complete the table below.

Financial Year (MM/YY to MM/YY)	01/10/2020 to 30/09/2021	
Product name	Quantity (<i>metric used to express quantity</i>)	Value of sales (£)
	<i>N/A – see response to Question 4</i>	<i>N/A – see response to Question 4</i>
<i>insert additional rows for each product that your company manufactures/sells</i>		

4. Please provide your company's total sales revenue for the last financial year.

We want to get a sense of the importance of Heavy Plates relative to the sales of your company as a whole.

SGRE provides wind power products and service solutions, which include not only wind turbines, but also project specific services, e.g. transport, installation/commissioning, after sales services as well as engineering and project management effort across all these value chains. The offer for the whole packages is also highly related to the overall contractual risk assessment. Thus, a break-down of sales price into components cannot be provided and is also not meaningful.

Information relating to costs

In this section, we want to get a sense of the importance of Heavy Plates relative to the total cost of the product(s) that your company manufactures/sells.

5. Please provide the cost of raw material in the last financial year for those products listed above which use or incorporate Heavy Plates. Please complete the table below.

Financial Year (MM/YY to MM/YY)	01/10/2020 to 30/09/2021	
Product name	Costs of Heavy Plates (£)	Cost of other raw materials (£)
9232 MT used in manufacture of 30 Complete Wind Turbine Towers	Confidential Info	Flanges : Confidential Door Frames : Confidential Kit Sets : Confidential Damper Slosh : Confidential
<i>insert additional rows for each product that your company manufactures/sells</i>		

6. Please provide the labour, indirect and total cost in the last financial year for those products which use or incorporate Heavy Plates. Please complete the table below.

Financial Year (MM/YY to MM/YY)	01/10/2020 to 30/09/2021			
Product name	Labour Costs (£)	Indirect/overhead costs (£)	Full manufacturing cost (£)	Quantity produced <i>(metric used to express quantity)</i>
	N/A	Confidential	Confidential	30 Complete Wind Turbine Towers (9232 M/T)
<i>insert additional rows for each product that your company manufactures/sells</i>				

Information relating to availability of substitute products

7. Please provide details of your company's suppliers of the Heavy Plates, including their country of origin.

Various Manufacturers located in
CHINA, SOUTH KOREA, INDONESIA, EU, UNITED STATES, BRAZIL, INDIA

8. Are there other sources of supply for the Heavy Plates? How feasible would it be for your company to switch to these suppliers if prices for the Heavy Plates change? Please provide any relevant information.

We want to understand whether Heavy Plates is produced in countries other than The People's Republic of China.

Product specification of our Tower designs, local content requirements, material cost, labour cost, transportation costs and manufacturing capacity issues all play a significant part in supplier selection.

9. Are there products that could be easily substituted for Heavy Plates? How feasible would it be for your company to switch to these products if prices for Heavy Plates change? Please provide any relevant information.

We want to understand the availability of products with similar characteristics to Heavy Plates.

NO – Due to the nature of our business and the size / weight of our components, there are no substitute products that we could use.

Other questions

10. How price-sensitive is demand for products that use or incorporate Heavy Plates? In other words, to what extent will sales [fall/rise] if you [raise/lower] prices? Please provide any relevant information.

As part of the greener energy transition, it is well-documented that, in the current Post-Covid climate of constrained supply and logistical challenges, companies like SGRE need to continually develop bigger and better turbines; driving down the cost of energy production and keeping a strict control on overheads is paramount to that continued success.

11. Please tell us how you would expect the implementation of a trade remedy measure to affect your company and industry.

Please tell us how your company and industry would be affected if the existing anti-dumping measure on Heavy Plates were to no longer apply.

As per Answer 8, product specification of our Tower designs, local content requirements, material cost, labour cost, transportation costs and manufacturing capacity issues all play a significant role in supplier selection.

The removal of or reciprocation of Anti-Dumping measures on Heavy Steel Plate would affect our ability to win any new contracts and have a major bearing on SGRE's future investment and (possible) manufacturing plans here in the UK.

12. Please tell us whether or not you purchase all of your Heavy Plates from the UK market. If not, could you elaborate? I.e. is it due to product quality, lead and delivery times, reliability of supply, grade of material etc)?

We have been unable to identify a suitable UK supplier who can manufacture to our product specifications.

13. Is there any other information you would like to provide to help us determine the likely effect of a tariff on Heavy Plates from The People's Republic of China on the overall economic interest of the UK?

As per Answer 11, the removal of or reciprocation of Anti-Dumping measures on Heavy Steel Plate would affect our ability to win any new contracts and have a major bearing on SGRE's future investment and (possible) manufacturing plans here in the UK.