



Pre-Sampling Questionnaire (Producer)
Transition review of anti-dumping measures
Case TD0035: Certain pneumatic tyres used for
buses or lorries exported from the People's
Republic of China

Period of Investigation:	1 January 2022 – 31 December 2022
Injury Period:	1 January 2019 – 31 December 2022
Deadline for response:	18 May 2023
Case Team Contact:	TD0035@traderemedies.gov.uk
Completed on behalf of:	Michelin Tyre plc

When you have completed this form, indicate the **confidentiality** status of this document by placing an X in the relevant box below and in the header. We strongly recommend this questionnaire to be completed on the computer, so this step is easy to complete:

☐ Confidential

☒ Non-Confidential – will be made publicly available

Please note that you will have to provide **two copies of your response** – a **Confidential** and a **Non-Confidential version**. Both copies must be returned to the TRA using the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **18 May 2023**.



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The scope of this review

Goods subject to review

This review covers certain pneumatic tyres, new or retreaded, of rubber, of a kind used for buses or lorries, with a load index exceeding 121, exported from the People's Republic of China (PRC).

These pneumatic tyres are currently classifiable within the following commodity codes:

- 4011 20 90 00;
- 4012 12 00 10.

These commodity codes are only given for information.

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

Like goods

This pre-sampling questionnaire asks for information about your company's imports and sales of goods which are **like** the goods subject to review. Any reference to '**like goods**' in this pre-sampling questionnaire refers to goods produced in the UK or imported to the UK from a country other than the People's Republic of China which are like the goods subject to review in all respects, or with characteristics closely resembling them.

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

For more information about this case, you may refer to the Notice of Initiation published at: www.trade-remedies.service.gov.uk/public/case/TD0035/.



Instructions

Why you are being asked to complete this pre-sampling questionnaire

We are seeking your cooperation as a **UK producer** of the like goods to inform our review of whether the current anti-dumping measure should be maintained, varied or discontinued.

This pre-sampling questionnaire allows us to collect basic information and data about your company. If a large number of UK producers complete this pre-sampling questionnaire, we will use the information each one provides to help us decide which companies we want to sample for further investigation. If you are sampled, we will send you a more detailed questionnaire to complete.

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

Who should complete this form

You should complete this form if you are a **UK producer** of the like goods in the review.

If you are not a **UK producer**, please complete either the relevant Pre-Sampling Questionnaire or the Other Interested Party and Contributor Registration Form if you have information that you wish to be considered during the investigation.

Deadline for response

A completed pre-sampling questionnaire must be submitted to the TRA by no later than 18 May 2023. If you are unable to provide a completed submission by the given due date and you wish to request an extension, please contact **James Reith**, TD0035@traderemedies.gov.uk and see the TRA's guidance on extension requests for further information.

Note about confidentiality

You will need to submit one confidential version and one non-confidential version of your pre-sampling questionnaire by the due date.

Please ensure that each page of information you provide is clearly marked either "Confidential" or "Non-Confidential" in the header.



It is your responsibility to ensure that the non-confidential version does not contain any confidential information, which includes personal contact information, names and signatures.

Please see the [TRA's public guidance](#) for further information on what can be considered confidential and how to prepare a non-confidential version of this questionnaire.

All information provided to the TRA in confidence will be treated accordingly and only used for this investigation (except in limited circumstance as permitted by regulation 46 of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019) and will be stored in protected systems.

The non-confidential version of your submission will be placed on the public file, which is available on www.trade-remedies.service.gov.uk/public/case/TD0035/.



Section A – Activities of your company and any associated parties

A1 – Your company's activities

To determine your company's role for the purpose of this review, please select the activity/activities of your company below. For a definition of goods subject to review please refer to above section on [the scope of this review](#).

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

If you have selected 'other', please describe the role of your company with regards to goods subject to review or like goods:

Click or tap here to enter text.

Please describe your interest in this review:

Michelin Tyre plc (MTPLC) manufactures retreaded truck tyres at its factory in Stoke-on-Trent. [*confidential information on the company's employment active in the production of the product concerned, sales activities, other activities and on the group network in the UK*]

A2 – Associated parties and operational links

Please give details of all associated parties involved with the company in the production and sales (export and/or domestic) of the like goods during the POI. Both natural persons (individuals) and legal persons (e.g. companies) are considered to



be associated where they meet the definition of 'Related Persons' in [regulation 128 of the Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#).

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

	Company name	Company location (city, country)	Activities	Relationship
Associated Party 1	Company A	UK	Tyre	Corporate group
Associated Party 2	Company B	France	Tyre	Corporate group

+ Add additional rows as required



Section B – Production, sales and imports

B1 – Production

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

	Volume (number of tyres)
Overall production of the like goods during the POI	[180-225]k
Total production capacity of the like goods during the POI	[250-330]k

B2 – Sales volume and value

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

	Volume (number of tyres)	Value in GBP (£)
UK sales of the like goods produced in the UK during the POI	[180-225]k	[20-25] million



B3 – Imports and Sales

If your company has also imported the goods subject to review from the People's Republic of China or like goods from any other country and sold them in the UK during the POI, provide your sales data for these imported goods subject to review.

	Volume (number of tyres)	Value in GBP (£)
Imports of the goods subject to review from the People's Republic of China during the POI	0	0
Imports of the like goods from countries other than the People's Republic of China during the POI	[170-210]k	[32-40] million
UK sales of the goods subject to review, imported from the People's Republic of China during the POI	0	0
UK sales of the like goods, imported from countries other than the People's Republic of China during the POI	[170-210]k	[47-55] million

Section C – Additional information

C1 – Other interested parties

If you believe there are other interested parties that should receive a questionnaire, please provide their organisation name and website details below.

Organisation name	Website
NA	

C2 – Particular Market Situation

If you have any concerns or information about the possible existence of a particular market situation in the exporting country or territory, please provide details in the box below. This can include examples such as:

- Prices are artificially low
- There is significant barter trade (e.g. goods exchanged for other goods)
- Prices reflect non-commercial factors; or
- Anything else

According to the Regulation published for the imposition of the measures, operators in the exporting country do not operate in market condition with regard to prices, costs and financing.

C3 – Scope

Do you agree with the scope of the investigation as outlined on page 3?

☒ Yes

☐ No

If you have answered no to the above question, please can you explain why?



Click or tap here to enter text.

C4 – 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.

Category:	Section Width (in mm or inches)	Aspect Ratio (% of section width)	Construction	Rim / Wheel Diameter (inches)	Tyre Position	Winter Tyre	Tubeless or Tubetype Tyre
Expected input:	numerical measurement	numerical measurement	R - radial, B- Bias	numerical measurement	F - front, D - drive, T - trailer, Z - multi-position	Y - yes, N - no	TL - tubeless, TT - with tube

Please review the draft PCN structure for this review shown in the table above. Please include any comments on the PCN structure in the box provided.



Click or tap here to enter text.

C5 – Economic Interest Test

It is a requirement of the review to conduct an Economic Interest Test (EIT). The aim of the EIT is to determine whether the implementation of the proposed trade remedy measure is in the wider economic interest of the UK. In order to obtain a complete picture of the UK market, could you please help by providing us with details of your UK suppliers (upstream companies providing inputs) and UK customers (downstream companies buying your like goods). Please confirm in the final column if we are able to contact these companies.

	Company name	Company location (city, country)	Company Contact Information (email/telephone)	Relationship	Can we contact Y/N
1	Supplier A	France	Personal data	Supplier	Y
2	Supplier B	UK	Personal data	Supplier	Y
3	Supplier C	UK	Personal data	Supplier	Y
4	Supplier D	UK	Personal data	Supplier	Y



5	Supplier F	UK	Personal data	Supplier	Y
6	Supplier G	UK	Personal data	Supplier	Y
7	Supplier H	UK	Personal data	Supplier	Y
8	Supplier I	UK	Personal data	Supplier	Y
9	Supplier J	UK	Personal data	Supplier	Y
10	Supplier K	UK	Personal data	Supplier	Y

C6 – Anything else

Please use the box below to provide information about anything else you consider relevant to this review.

Remanufacturing truck tyres allows a new tyre specifically designed to be retreaded to have multiple lives. This saves significant quantities of raw materials and CO2 emissions, and remanufactured products could and should form the backbone of a truly circular economy.

[Confidential information on the performances of the company, availability of the cost of inputs and impact of the measures]

Now you have reached the end of this questionnaire please ensure that you have prepared a confidential and non-confidential version and indicated the status of each within the header. The non-confidential version should redact personal contact information, names, signatures, and exact sales quotes. Redacted figures should be replaced with a range where possible. Please return both versions to the TRA using the Trade Remedies Service (trade-remedies.service.gov.uk).