



Pre-Sampling Questionnaire (Importer)
Transition review of anti-dumping measures
Case TD0037: electric bicycles exported from the
People's Republic of China

Period of Investigation:	1 April 2022 – 31 March 2023
Injury Period:	1 April 2019 – 31 March 2023
Deadline for response:	6 June 2023
Case Team Contact:	TD0037@traderemedies.gov.uk
Completed on behalf of:	HALFORDS LIMITED

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 6 June 2023.



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The scope of this review

Goods subject to review

This review covers electric bicycles exported from the People's Republic of China, described as:

- Cycles, with pedal assistance, with an auxiliary motor.

These electric bicycles are currently classifiable within the following commodity codes 87 11 60 10 10 and 87 11 60 90 10. These commodity codes are only given for information.

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

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: trade-remedies.service.gov.uk/public/case/TD0037/.



Instructions

Who should complete this form

You should complete this form if you are a **UK importer** of the goods subject to review.

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

We are seeking your cooperation as a UK importer of the goods subject to review to inform our review whether the current countervailing measure should be maintained, varied, or discontinued. If you are not a UK importer of the goods subject to review, please complete either the relevant Pre-Sampling Questionnaire or the Other Interested Party and Contributor Registration Form if you have information which you wish to be considered during the review.

This pre-sampling questionnaire allows us to collect basic information and data about your company. If a large number of UK importers 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.

Deadline for response

A completed pre-sampling questionnaire must be submitted to the TRA by no later than 6 June 2023. If you are unable to provide a completed submission by the given due date and you wish to request an extension, please contact Zoe Manson, TD0037@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 trade-remedies.service.gov.uk/public/case/TD0037/.



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 the section above on ‘the scope of this review’.

- importer of the goods subject to review in the UK
- other (please give details below)

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

Click or tap here to enter text.)

Please describe your interest in this review:

Halfords is the UK’s leading provider of motoring and cycling products and services, the majority of which are currently imported from countries in the Far East (ex China) and Europe.



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 goods subject to review or like goods during the POI. Both natural persons (individuals) and legal persons (e.g. companies) are considered to be associated where they meet the definition of 'Related Persons' in [regulation 128 of the Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#).

Examples of activities could include manufacturing, exporting, purchasing, warehousing, sales (domestic), sales (export), further processing of the goods subject to review or like goods.

	Company name	Company location (city, country)	Activities	Relationship
Associated Party 1				
Associated Party 2				

+ Add additional rows as required



Section B – Details of companies you import from

Please provide the contact details for each individual company you import from.
Please confirm in the final column if we are able to contact these companies.

Exporter/Supplier name	Address	Contact Details	Can we contact Y/N

+ Add additional rows as required



Section C – Sales, imports and domestic purchases

C1 – Total company revenue

Please provide your company’s total revenue and the revenue of the goods subject to review:

	Value in GBP (£)
Total revenue of your company during the POI	£1,586.4m (Total Group Revenue Goods and Services)
Total revenue of your company for the goods subject to review during the POI	Halfords is unable to disclose this information due to commercial confidentiality however we hope the prevalence of Halfords to the UK cycling market will not preclude us from participating in this review.

C2 – Your imports of the goods subject to review

Please provide the total volume and value of the goods subject to review **imported** by your company from the People’s Republic of China during the POI:

	Volume (KG)	Volume (Number of bicycles)	Value in GBP (£)



The goods subject to review imported into the UK during the POI <i>(Sum of next three rows should match volume/value of this row)</i>	N/A	N/A	N/A
The goods subject to review imported into the UK during the POI and resold in the UK	N/A	N/A	N/A
The goods subject to review imported into the UK during the POI and consumed by your own company	N/A	N/A	N/A
The goods subject to review imported into the UK during the POI and exported	N/A	N/A	N/A

Please provide the total volume and value of the like goods **imported** by your company from **all other countries** during the POI:

	Volume (KG)	Volume (Number of bicycles)	Value in GBP (£)



The like goods imported into the UK during the POI <i>(Sum of next three rows should match volume/value of this row)</i>	13,113.91	29,219	Halfords is unable to disclose this information due to commercial confidentiality however we hope the prevalence of Halfords to the UK cycling market will not preclude us from participating in this review.
The like goods imported into the UK during the POI and resold in the UK			
The like goods imported into the UK during the POI and consumed by your own company	13,113.91	29,219	Halfords is unable to disclose this information due to commercial confidentiality however we hope the prevalence of Halfords to the UK cycling market will not preclude us from participating in this review.
The like goods imported into the UK during the POI and exported			

C3 – Like goods purchased from a UK producer

If you have also **purchased like goods** from a **UK producer** during the POI, please provide the total sales volume and total sales price value of your purchases in the table below.



	Volume (KG)	Volume (Number of bicycles)	Value in GBP (£)
Like goods purchased from UK producers during the POI <i>(Sum of next three rows should match volume/value of this row)</i>	N/A	N/A	N/A
Like goods purchased from UK producers during the POI and resold in the UK market	N/A	N/A	N/A
Like goods purchased from UK producers during the POI and consumed by your own company	N/A	N/A	N/A
Like goods purchased from UK producers during the POI and exported	N/A	N/A	N/A



Section D – Additional information

D1 – 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

D2 – 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

Concerns have been expressed by some teams within Halfords over sub-standard, low quality products entering the market from China if measures are removed completely. However, this is outside of the scope of this investigation but could be considered a relevant repercussion if appropriate controls are not put in place to monitor quality of goods entering the market.



D3 – 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?

The measures were introduced by the EU and continued post Brexit. They have been in place for 5 years and have significantly reduced imports of Chinese e-bikes. Any Chinese E-bikes purchased by Halfords are purchased DDP from UK based distributors. The ADD and CVD makes sourcing e-bikes from China uncompetitive in most cases. There is limited UK e-bike manufacturing and as such it seems very sensible to review these measures to see if they are still serving a purpose now the UK is no longer part of the EU.

D4 – 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	Sub-category Format	Explanation
Frame material	S	Steel (or alloy)
	A	Aluminium (or alloy)
	C	Carbon (or alloy)
	T	Titanium (or alloy)
	O	Other
Battery power	A	<=350Wh



	B	>350Wh - <=550Wh
	C	>550Wh - <=750Wh
	D	>750Wh
Motor type 1	F	Front hub
	R	Rear hub
	M	Mid-drive
Motor type 2	1	Pedal assisted
	2	Powered
Motor output (Watts)	A	<=250W
	B	>250W
Brakes	DM	Disk mechanical
	DH	Disc hydraulic
	RM	Rim mechanical
	RH	Rim hydraulic
Forks/suspension	OO	None
	PC	Partial coil suspension (this would commonly be a front wheel suspension only)
	PA	Partial air suspension (this would commonly be a front wheel suspension only)
	FC	Full coil suspension
	FA	Full air suspension
Number of wheels	2	Two
	3	Three
	4	Four



Tyres	R	Road
	H	Hybrid
	M	Mountain bike
	F	Fat-tyre
Foldability	Y	Foldable
	N	Not foldable

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.

It looks sensible, no comments.

D5 – 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					



2					
3					
4					

D6 – Anything else

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

It is quite evident that the measures have had a significant impact on the level of e-bikes imported from China into the UK. There is little to no UK manufacturing of e-bikes and therefore, it seems sensible that the TRA is undertaking this expiry review. Halfords would be happy to support the review and provide further information as required by the TRA.

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).