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**UK Importer Questionnaire
Case TD0057
Transition review of anti-dumping measures on
Aluminium Foil in Rolls
Originating in the People's Republic of China (PRC)**

Period of Investigation:	1 January 2023 – 31 December 2023
Injury Period:	1 January 2020 – 31 December 2023
Deadline for response:	15 September 2024
Case team contact:	TD0057@traderemedies.gov.uk
Completed on behalf of:	WM MORRISON SUPERMARKETS 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 the Deadline.

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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 UK industry. The TRA has been established to provide the UK with its own independent trade remedies system.

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.

This transition review will consider whether dumping of Aluminium Foil in Rolls originating in the PRC and injury to the UK industry would be likely to continue or recur if the anti-dumping amount currently applicable were no longer applied to those goods.

Why should I take part?

We are seeking your cooperation as a UK importer to inform our review of whether the current anti-dumping duty should be maintained or revoked.

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 the Deadline. 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.

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 by the Trade Remedies (Amendment) (EU Exit) Regulations 2019 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 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).
- All figures should be reported net of recoverable tax unless otherwise stated.
- Please refer to the case number 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 annexes 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/cases.

Providing information from subsidiaries or associated parties

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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 subject to review.

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 importer of the goods subject to review or the like goods, they should **also** complete an Importer questionnaire. Please make sure you provide your subsidiaries with access to it.
- If your subsidiaries or associated companies are not UK importers but are involved in the downstream sales of the goods subject to review or 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 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.

Verifying the information you supply

The TRA 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.

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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.

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The scope of this review

Goods subject to review

This review covers Aluminium Foil in Rolls exported from **the PRC**, described as: **Aluminium foil of a thickness of 0,007 mm or more but less than 0,021 mm, not backed, not further worked than rolled but whether or not embossed, in rolls of a weight not exceeding 10 kg.**

These **goods** are currently classifiable within the following commodity codes:

- 76 07 11 11 11
- 76 07 19 10 11
- 76 07 19 10 19
- 76 07 11 11 19

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.

Like goods

In addition to seeking information about your company's imports to the UK of the goods subject to review, this questionnaire will also ask about your sales of like good/goods subject to review. 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. For example, jumbo rolls of aluminium foil.

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

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:	WM Morrison Supermarkets Ltd
Legal structure (e.g., <limited company, sole trader, partnership> etc):	Limited company
Company registration number:	00358949
Place of registration:	Bradford, United Kingdom
Name (point of contact):	[Redacted]
Position:	[Redacted]
Address:	Hilmore House, Gain Lane, Bradford, BD3 7DL
Telephone No:	[Redacted]
Email:	[Redacted]
Website:	www.groceries.morrisons.com

A2 About your company

1. Please describe the role of your company, in the UK market, for the like goods and/or goods subject to review, (e.g., buying or selling agent, importer/distributor, importer/wholesaler, importer/retailer or importer/end user).

<p><i>A large supermarket trading predominately in United Kingdom selling consumer foods and household goods through own stores, partnership stores, own website, Amazon and wholesale businesses.</i></p> <p><i>We import own brand foil products and purchase limited lines of branded foils for retail sale.</i></p>
<p>Appendix reference: N/A</p>

A3 Organisational structure

1. Please complete **Annex A3 – Operational Structure** for your company’s worldwide corporate structure and affiliations.

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

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 import of the like goods/goods subject to review in the UK.

[Redacted]
Appendix reference: N/A

A4 Understanding the UK market

1. Please explain the end use of the goods subject to review 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.

<i>For retail sale in own stores, partnership stores, online own platform, online via partner’s platform.</i>
Appendix reference: A4 - 1

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

<i>Competition between major supermarket and discounters is general very price sensitive.</i>
Appendix reference: A4-2

3. How price-sensitive is demand for the goods subject to review and like good? In other words, to what extent will the overall demand for goods subject to review change in response to changes in price?

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The demand for aluminium foil is promotion/price sensitive the volumes increase when special promotions are in place.

Appendix reference: A4-3

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

[Redacted]
Appendix reference:A4-3

5. What are the major distribution and marketing channels within the UK market for the goods subject to review and the like goods?

<i>Goods are mainly distributed from warehouse to physical stores and online channels; there are no specific marketing channels just for foils, only in store/online promotional banners.</i>
Appendix reference: N/A

6. Who are the general users/consumers/customers within the UK market for the goods subject to review and the like goods?

<i>Consumers</i>
Appendix reference: N/A

7. Provide a general description of any government regulations or tax incentives affecting the import or sale of the goods subject to review and the like goods.

N/A
Appendix reference: N/A

8. Are there any goods which could be substituted for the goods subject to review and the like goods?

N/A
Appendix reference: N/A

9. Provide a comment on any other factors which influence the market for the like goods and goods subject to review (e.g., seasonality).

<i>Turkey foil with larger width has the biggest seasonal impact.</i>

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	Appendix reference: N/A

A5 Operational links with other companies or persons

1. Complete the table below if your company has established long-term agreements and/or relationships with any company/companies located in the UK, or the PRC, for the supply and sale of the like goods/goods subject to review.

Company name and address	Nature of agreement	Company registration number and place of registration	Appendix Number of contract
[Redacted]	[Redacted]	[Redacted]	

+Add additional rows as required

A6 Accounting practices

1. 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 five financial years, please describe these changes.

[Redacted]
Appendix reference:

2. Have you changed your financial policies during the injury period? Please explain the changes, including dates and the reasons for those changes along with the financial impact of those changes against the goods subject to review or like goods.

[Redacted]
Appendix reference:

A7 Your company’s products

1. Please complete **Annex A8 – Your Company’s Products** for all like goods and goods subject to review that you import. If your company imports a range of like goods or goods subject to review, list this information for each individual make and model in the range.

A8 Suppliers of the imported goods

1. Please provide the contact details for each company that supplies you with the like goods/goods subject to review. If the supplier is not the manufacturer of the goods, please also provide the details of the manufacturer in the table below.

Supplier name	Address	Contact details (email and phone number)	Is the supplier the manufacturer of the goods?
Supplier A	[Redacted]	[Redacted]	Yes
Supplier B	[Redacted]	[Redacted]	Yes

+Add additional rows as required

SECTION B: Imports and forward orders

B1 Imports

1. Please complete **Annex B1- Imports** for all like goods/goods subject to review imported indicating the CIF value, volume and average price. Where the source of imports is **NOT** the country where the good was produced, if known, please state the country of manufacture.
2. If the CIF value has been estimated, then please provide an explanation as to how it has been calculated.

<i>All goods were imported and CIF values are calculated based on price of goods plus freight and insurance, exchange rates used are HMRC rates at the time of import.</i>	
	Appendix reference: [Redacted]

3. Please explain the costs incurred by your company between frontier and arrival of the like goods /goods subject to review at your warehouse and categorise them as duties, import costs or post-import costs. Are these costs incurred as a percentage of the purchase price, or as a fixed amount per unit of the goods subject to review?

[Redacted]	
	Appendix reference: [Redacted]

B2 Imports reconciliation

1. Please complete the Imports reconciliation table in **Annex B2 – Imports reconciliation** starting from the bottom of the table and filling in only the white cells. Please see additional notes in the annex for assistance on how to complete it.

SECTION C: Cause of injury

The purpose of this section is to collect information as to whether there would be injury to the UK industry if the existing anti-dumping amount were removed. Note that the information submitted at this point can only be considered if supported by **factual evidence**.

1. If the existing anti-dumping measure on the goods subject to review no longer applied, would there be injury to the UK producers of the like goods? Please provide evidence to support your view. Please also provide details of any other reasons that could contribute to such injury to the UK industry other than any imports of the goods subject to review, for example: contraction in demand or changes in the pattern of consumption of the like goods or goods subject to review in the United Kingdom, or developments in technology.

[Redacted]	
	Appendix reference: N/A

SECTION D: Economic Interest Test

The Economic Interest Test helps the TRA assess the economic impact of a measure compared to what would happen if it the measure was not in place. 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 dumped 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.

D1 Background

1. Please provide an overview of your downstream supply chain. Please indicate who the consumers of the goods subject to review are, which industry and level of trade they relate to and whether they are companies or private individuals.

<i>The foils are purchased, delivered to UK warehouses then distributed to stores or for onward supply.</i>	
	Appendix reference: N/A

D2 Your company

- 2. Please complete **Annex E1 – Economic Interest Test**, providing employment figures in full-time equivalents (FTE) for each of your company’s UK sites or facilities.
- 3. How would these employment figures be affected if an anti-dumping measure was no longer to apply? Please support your claims with evidence.

[Redacted]
Appendix reference:

- 4. How would your domestic sales of the goods subject to review be affected if the existing anti-dumping measure was no longer to apply? Please support your claims with evidence.

[Redacted]
Appendix reference:

- 5. How significant are the imports of the goods subject to review relative to your company’s overall volume of imports?

[Redacted]
Appendix reference:

D3 Potential impacts of a measure

6. Please describe how you would expect a decrease in the import prices of the goods subject to review to affect each of the following. Where possible, please support your claims with evidence.
- Domestic prices of the goods subject to review in the UK;

[Redacted]
Appendix reference:

- Total UK production of the goods subject to review;

[Redacted]
Appendix reference:

- Total imports of the goods subject to review from the PRC and other third countries to the UK; and

[Redacted]
Appendix reference:

- Total exports of the goods subject to review from the UK.

[Redacted]
Appendix reference:

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7. Do you know of any related industries that would be affected if the existing anti-dumping measure was no longer to apply?

Please consider in particular:

- Businesses that produce inputs (such as raw materials) needed for the production of the goods subject to review;

[Redacted]
Appendix reference:

- Businesses that purchase the goods subject to review aluminium foil – those who purchase the goods subject to review;

<i>Please answer here</i>
Appendix reference:

- Industries for complimentary goods – those which would typically be bought alongside the goods subject to review (such as ink being bought with printers);

[Redacted]
Appendix reference:

- Industries for substitute goods – those which might be bought instead of the goods subject to the review (such as margarine instead of butter).

[Redacted]
Appendix reference:

8. To what extent would you expect any changes in prices of the goods subject to review to be passed onto final consumers?

[Redacted]
Appendix reference:

9. Would your plans for investment or expansion in the UK over the next five years be affected if the existing anti-dumping measure was no longer to apply? Please support your claims with evidence.

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[Redacted]	
	Appendix reference:

10. 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 any of these groups or any other particular group might be disproportionately affected if the existing anti-dumping measure was to no longer apply.

[Redacted]	
	Appendix reference:

13. How would the number or range of suppliers in the aluminium foil in rolls market be affected, if the existing anti-dumping measure was to no longer apply? Please provide an explanation.

[Redacted]	
	Appendix reference:

14. How would the suppliers' ability to differentiate their products by price, quality, service or innovation in the aluminium foil in rolls market be affected, if the existing anti-dumping measure was to no longer apply? Please provide an explanation.

[Redacted]	
	Appendix reference:

15. How would the cost of switching between suppliers in the goods subject to review market be affected if the existing anti-dumping measure was to no longer apply? Please provide an explanation.

[Redacted]	
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	Appendix reference:
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16. How would the suppliers' ability to set agreed prices between themselves or for certain consumers or products be affected if the existing anti-dumping measure was to no longer apply? Please provide an explanation.

[Redacted]	
	Appendix reference:

17. How would the choices of the goods subject to review available to consumers be affected if the existing anti-dumping measure was to no longer apply? Please provide an explanation.

[Redacted]	
	Appendix reference:

18. How would the ability of downstream businesses or consumers to make informed decisions be affected if the existing anti-dumping measure was to no longer apply? Please provide an explanation.

[Redacted]	
	Appendix reference:

19. Are there any additional economic factors that you consider to be relevant for the Economic Interest Test in this investigation?

[Redacted]	
	Appendix reference:

SECTION E: Dumping

E1 Dumping

1. Do you have any information about the normal value of the goods subject to review in the PRC? Please substantiate with evidence where possible.

Morrison's has no information of this nature to provide.
Appendix reference: N/A

2. Do you have any information about the export price of the goods subject to review from the PRC? Please substantiate with evidence where possible.

Morrison's has no information of this nature to provide.
Appendix reference: N/A

E2 Likelihood of dumping

1. Do you have any information about the capacity and capacity utilisation among exporters of the goods subject to review during the POI? Please provide estimates and substantiate with evidence where possible.

Morrison's has no information of this nature to provide.
Appendix reference: N/A

2. Please provide any additional information that might inform our assessment of whether imports of the goods subject to review are likely to be dumped if the measure is removed.

[Redacted]
Appendix reference:

SECTION F: 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	✓
Section B – Imports and forward orders	✓
Section C – Cause of Injury	✓
Section D – Economic Interest Test	✓
Section E – Dumping	✓

+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
A4-1	A4-1
A4-2	A4-2
A4-3	A4-3
B1	B1 COGS CIF

+Add additional rows as required