

**UK Producer 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:	Prowrap Group - Wrapex Ltd / Procure UK 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](http://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 the goods subject to review 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 asking domestic producers of Aluminium Foil in Rolls to complete this questionnaire to inform our review of whether the current anti-dumping measure 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 annexes 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.
- 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 in any correspondence with the TRA.

## Preparing confidential and non-confidential versions

You will need to submit one confidential version and one non-confidential version of your questionnaire and the corresponding spreadsheet annex by the due date. This is so that we can 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, 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](http://www.trade-remedies.service.gov.uk/public/cases).

## Providing information from subsidiaries or associated parties

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 producer of like goods, they should **also** complete a Producer questionnaire. Please make sure you provide your subsidiaries with access to it.
- Where your subsidiaries or associated companies are not producers but are involved in the sales of 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(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.

## Verifying the information you supply

The TRA will verify, as far as possible, the information provided to it. 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 (in particular, those who completed the questionnaire annexes and subject matter experts) 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 visits may be conducted remotely.

Once verification is complete, the TRA will prepare a report and share a draft with you. The TRA 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.

## 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

This questionnaire asks for information about your company’s production and sales of goods which are **like** the goods subject to review. Any reference to **‘like goods’** in this questionnaire refers to goods produced in the UK or imported to the UK from a country other than the PRC 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:	Prowrap Ltd – Wrapex Ltd and Procure UK Ltd
Legal structure (e.g., limited company, sole trader, partnership etc):	Limited Company
Year of establishment:	Wrapex Ltd 1994 & Procure UK Ltd 2002
Other operating names:	None
Company registration number:	Wrapex - 02981251 Procure - 04527914
Place of registration:	United Kingdom - England
Name (point of contact):	[Redacted – contains personal information]
Position:	CEO
Address:	Unit 6 Lodge Causeway Trading Estate, Bristol, BS16 3JB
Telephone No:	[Redacted – contains personal information]
Email:	[Redacted – contains personal information]
Website:	<a href="http://www.Wrapex.Com">www.Wrapex.Com</a> / <a href="http://www.Procarehairfoils.com">www.Procarehairfoils.com</a>

**A2 About your company**

- 1. Describe the role of your company in the UK market for the like goods (e.g., producer, producer/exporter, producer/importer or producer/distributor).

Wrapex Limited (**Wrapex**) and Procure UK Limited (**Procure**) are both manufacturers of like goods, operating from premises in Bristol, UK.

[Redacted – commercially sensitive information regarding the business sectors and markets the goods are sold to/in]

Appendix reference:

- 2. Please provide details of any changes in the legal form of your business over the past 5 years, for example, mergers, acquisitions and/or sales.

Date	Legal form	Explanation of change
11/3/2020	Substantial change in the ownership of Prowrap Limited, which is a parent company of Wrapex and Procure.	Longacre Group Limited ( <b>Longacre</b> ) became the majority shareholder in Prowrap Limited. Until March 2020 the business had been privately owned by the senior management team, but the majority of shares were then sold to Longacre, which is a UK-based small private equity house. The previous owners retain minority shareholdings in the business.

+Add additional rows as required.

- 3. List and explain all authorisations your company has been required to obtain to produce, sell, or to export the like goods. These may include licences, permits, permissions or mining concessions. Indicate if your company is subject to any direct or indirect, quantitative, or other, restrictions on any of these activities.

[Redacted – confidential information relating to the jurisdictions within which Wrapex and Procure operate and the relevant authorisations of those jurisdictions]

Appendix reference:

- 4. List all international production standards (BS / EN etc) your company currently conforms to, for the like good.

[Redacted – confidential information relating to the jurisdictions within which Wrapex and Procure operate and the relevant authorisations of those jurisdictions]

Appendix reference:

5. Please describe all the other products (not including the like goods) produced or sold by your company in the UK.

[Redacted – commercially sensitive confidential information relating to the specific goods produced]

Appendix reference:

6. State whether your company is a member of any representative organisations (e.g., trade bodies, associations, Chambers of Commerce). If so, provide a copy of the relevant documentation.

[Redacted – commercially sensitive confidential information]

Appendix reference:

### A3 Organisational structure

Please answer the questions below about the internal structure of your company and any associations with other companies. Both natural persons (individuals) or legal persons (e.g., companies) are associated where they meet the definition of ‘Related Persons’ in Regulation 128 of the *Customs (Import Duty) (EU Exit) Regulations 2018*.

1. 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 production, sales, R&D, supply and distribution of the like goods for domestic and export markets.

[Redacted – commercially sensitive confidential information directly relating to the structure and strategy of the businesses]

Appendix reference: [Redacted – please see directly above]

2. Please provide a written summary and a diagram/flow chart, if available, of your production process for the like goods that you produce in the UK. Clearly indicate the different production stages carried out by your company.

[Redacted – commercially sensitive confidential information directly relating to the structure and strategy of the businesses]

Appendix reference: [Redacted – please see directly above]

3. Please complete **Annex 1 – Associated companies** for your company’s worldwide corporate structure and affiliations.

## 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.

[Redacted – commercially sensitive confidential information relating to the specific goods produced, their intended uses and sectors/companies sold to]

Appendix reference:

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.

[Redacted – commercially sensitive confidential information relating to the competitors e.g., specific companies and jurisdictions]

In addition, we believe that our products compete with the products subject to review, which are imported products from China, but we do not have sufficient market intelligence to confirm the extent to which these products are currently imported into the UK.

Appendix reference:

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 the goods subject to review change in response to changes in price?

We do not believe that the overall demand for the goods subject to review will change significantly in response to changes in price.

However, given the nature of the products, we believe that customers in practice can switch between suppliers (both domestic and overseas) in response to variations in price. For example, if [redacted – commercially sensitive confidential information relating to a specific product produced] can be imported more cheaply than they can be produced in the UK some customers, such as [redacted – commercially sensitive confidential information relating to the companies/markets the products are sold to], may review where they source those products from.

[Redacted – commercially sensitive confidential information relating to the practices of Wrapex and Procure]

Appendix reference:

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

Generally speaking, price is likely to be the most important factor in customers' purchasing decisions, particularly in an inflationary environment and given that the like products in question are typically interchangeable. Having said that, any particular customer may have a range of other factors that will inform their purchasing decisions (for example, ethical reasons, customer service, quality of product, a preference to support UK manufacturing, continuity of supply, hygiene and safety reasons). In some cases, the unique features of products such as [redacted – commercially sensitive confidential information relating to the specifics of the products produced] might mean that customers will choose our products rather than cheaper alternatives.

Appendix reference:

5. To what extent is it feasible for producers to change their level of production in response to changing market conditions such as increases in demand?

It generally should be feasible for a producer to change its level of production if it has the capacity to produce more based on its own plant, machinery, staff, etc.

[Redacted – commercially sensitive confidential information relating to the operations, infrastructure and processes etc. of Wrapex and Procure]

Appendix reference:

6. Provide a general description of the trends and drivers of demand within the UK market for the goods subject to review and the like goods, including causes of demand fluctuations and any factors contributing to overall market growth or decline.

[Redacted – commercially sensitive confidential information relating to the products produced by Wrapex and Procure and demand trends]

Appendix reference:

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

[Redacted – commercially sensitive confidential information relating to distribution and marketing strategies of Wrapex and Procare]

Appendix reference:

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

[Redacted – commercially sensitive confidential information relating to the identifies of types of purchasers of specific goods]

Appendix reference:

9. Do the goods subject to review and like goods compete directly with one another?

We do not have full visibility in relation to the quantities of goods under review that are currently being imported into the UK. We also do not have full visibility in relation to the goods subject to review that are likely to be exported to the UK by Chinese producers in a scenario where the ADDs were removed.

However, as a general rule, the like goods and the goods subject to review are interchangeable or at least capable of being interchangeable (e.g. adapted to meet particular UK standards). If ADDs were to be removed, we expect that, whether initially or in the very short term, Chinese producers would match / copy UK specifications to ensure that price becomes the significant differentiating factor in any purchasing decision.

Appendix reference:

10. Provide a general description of developments in technology affecting the characteristics, demand or the production process of the goods subject to review and the like goods.

Developments in technology that can affect demand have largely been around sustainability, food safety and hygiene.

[Redacted – commercially sensitive confidential information relating to the specific technological investments made by Wrapex and Procare connected to the production of like goods]

Appendix reference:

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

In our view, the uses to which the goods are put by our consumers could not be achieved by any other substitutable products (other than other like goods and goods subject to review) that would have the same characteristics and performance.

Appendix reference:

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

Please refer to our response to question 6, above.

Appendix reference:

**A5 Board members and principal shareholders**

1. Please complete the table below for any shareholder with >5% holding in the company who also has interest in any organisation related to the production, marketing, administration, and sale of the like good in the UK or the PRC.

<b>Name</b>	<b>Shareholding in company</b>	<b>Name of Other Companies in which person holds interest</b>	<b>Activity of other companies</b>
N/A			

+Add additional rows as required.

2. Please complete the table below for any members of the Board of Directors who also has interest in any organisation related to the production, marketing, administration and sale of the like good in the UK or the PRC.

<b>Name</b>	<b>Position on Board of Directors</b>	<b>Name of Other Companies in which person holds interest</b>	<b>Activity of other companies</b>
N/A			

+Add additional rows as required.

**A5 Operational links with other companies or persons**

1. Please complete the table below if your company has established long term agreements or relationships with any company/companies located in any country, for the production (e.g., sub-contracting), supply and sale of the goods subject to review or the like goods, or other licensing, technical patent or compensatory agreements. Please provide the relevant contract for each agreement listed.

<b>Company name and address</b>	<b>Nature of agreement</b>	<b>Company registration number and place of registration</b>	<b>Appendix Number of contract</b>
N/A			

+Add additional rows as required

**A6 Accounting practices**

1. Give the address where your company’s accounting records are kept and can be verified by the TRA. If records are maintained in different locations, please indicate which records are kept at which location. If records are digital and do not have a physical location, please mark as N/A.

Records address	What records are held?
Unit 6 Lodge Causeway Trading Estate, Lodge Causeway, Fishponds, Bristol, BS16 3JB (Company headquarters)	All statutory files

2. 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 four financial years, please describe these changes.

Our financial year is 1 <sup>st</sup> Oct – 30 <sup>th</sup> September. [Redacted – commercially sensitive confidential information relating to the accounting practices and systems of Wrapex and Procare]	Appendix reference:
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3. For your company and any associated parties involved in the production, marketing or sales of your goods, please attach a copy of your annual reports, including the financial statements and audit report covering the injury period.

Our statutory accounts are available at Companies House. Wrapex’s full accounts for the year ended 30 September 2023 are available <a href="#">here</a> . Procare’s full accounts for the year ended 30 September 2023 are available <a href="#">here</a> .	Appendix reference:
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4. If your accounts are unaudited, please attach a copy of your unaudited financial statements for the injury period.

N/A	Appendix reference:
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- 5. Please attach a copy of your company’s trial balance(s) (in original and spreadsheet form) covering the POI. If your financial year is not aligned with the POI, please provide trial balances to cover all financial periods where a part of that financial period falls within the POI.

[Redacted – commercially sensitive confidential information]

Appendix reference: [Redacted – commercially sensitive confidential information]

- 6. For your company and any associated parties involved in the production, marketing or sales of the like goods or the goods subject to review, please attach copies of relevant management accounts and other relevant management information (e.g., profit and loss statement) for the profit centre that includes the like goods. Please provide these reports for the (i) POI and (ii) most recently completed financial year.

[Redacted – commercially sensitive confidential information]

Appendix reference: [Redacted – commercially sensitive confidential information]

- 7. If your company is part of a group of companies, please also attach a copy of the consolidated accounts of the group for your most recently completed financial year.

Group accounts are available at Companies House. Prowrap Group’s accounts for the year ended 30 September 2023 are available [here](#).

Appendix reference:

8. Please provide a description of your financial accounting system, explaining how sub-ledgers (e.g., costing, debtors, creditors) and other sales or production systems integrate with each other and the general ledger. Please provide a description of how it links to the management accounting system, including any manual interventions. Please also attach:
- your company’s chart of accounts
  - your company’s cost centres

[Redacted - commercially sensitive confidential information relating to the financial structure and processes of Wrapex and Procare]

Appendix reference:

9. Have you changed your financial policies during the injury period? If so, please explain the changes, including dates and the reasons for those changes along with the financial impact of those changes against the like goods.

No changes to accounting policies.

Appendix reference:

## SECTION B: About your goods

### B1 Understanding your like goods

The goods subject to review in this review are defined in [‘the scope of this review’](#).

1. Please complete **Annex 2 – Product comparison**, If your company manufactures a range of like goods, list this information for each individual make and model in the range.
2. If there are differences in characteristics within your range of like goods which cause distinguishable differences in price, explain those differences and the effect they have. Attach any evidence you have that is relevant. This could take the form of sales brochures, input costs, research papers or any other relevant documentation.

[Redacted – commercially sensitive confidential information relating to the specifics of the like products]

Appendix reference:

3. Indicate in the box below any physical, commercial or functional differences between your products and the goods subject to review. If these differences cause distinguishable variations in price, explain those differences and the effect they have. Attach any evidence you have that is relevant.

A range of potential differences are described in response to the previous question.

We do not have a full understanding of the goods subject to review which are imported into the UK other than that they are [redacted – commercially sensitive confidential information referencing products which are similar to those produced by Wrapex and Procure].

In the event that the ADDs were removed, we would expect the Chinese exporters to very quickly begin dumping large quantities of [redacted – commercially sensitive confidential information referencing products which are similar to those produced by Wrapex and Procure] into the UK market. We believe that to the extent the goods subject to review do not already meet customer requirements, Chinese exporters have the ability and capacity to promptly tailor their exports to match the requirements of particular customers on the UK market.

Appendix reference:

4. Please provide details of your like goods regarding their production processes, interchangeability, raw materials used, degree of model differentiation channels of distribution and sale, pricing and other relevant characteristics.

[Redacted – commercially sensitive confidential information relating to the production process and specification of Wrapex and Procare]

Appendix reference:

## SECTION C: Costs and Production

### C1 Cost to make and sell

[Note that this section is for the cost of production in the POI.]

1. Please Complete **Annex 3 – Cost to make and sell** for your total goods and for the total like goods produced in the POI.
2. If your company is vertically integrated or some of the inputs (e.g., raw materials, energy) used in the production of your like goods are produced by an associated party, provide details of this arrangement, and attach documentation demonstrating any agreements you have.

N/A

Appendix reference:

3. Please state the cost allocation method for each cost type listed in **Annex 3 – Cost to make and sell**.

[Redacted – commercially sensitive confidential information relating to the costing practices of Wrapex and Procure]

Appendix reference:

### C2 Cost and sales reconciliation

1. Please complete **Annex 4 – Cost reconciliation**: please only fill in the white cells and include reference to the source documents of the inserted data.

**C3 Production process**

- 1. Please provide a written summary and a diagram/flow of your production process clearly indicating the different production stages for your like goods carried out by your company.

[Redacted – commercially sensitive confidential information relating to specific production processes]

Appendix reference: [Redacted – please see directly above]

- 2. Identify what parts of your production process take place in the UK and explain at what stage the most value is added to your like goods in the production process. Please describe the manufacturing process of the like goods, its level of complexity and the investment of capital involved. If a production process is carried out outside the UK, please explain the nature of the activity and where this process step takes place.

[Redacted – commercially sensitive confidential information relating to location of manufacturing and investment]

Appendix reference:

- 3. Please provide the physical addresses (including town/city and county) of all your company’s UK sites/facilities involved in the production of the like goods.

Company name	Physical address
Wrapex Ltd	Unit 5&6, Lodge Causeway Trading Estate, Lodge Causeway, Fishponds, Bristol BS16 3JB
Procure UK Ltd	Unit 5&6, Lodge Causeway Trading Estate, Lodge Causeway, Fishponds, Bristol BS16 3JB

Appendix reference:

+Add additional rows as required

**C5 Raw material (RM) and major input purchases**

1. Please complete **Annex 5 – Raw materials and input purchases**, detailing by supplier, purchases, which account for more than 5% of total cost to make and sell, used in the production of the like goods during the POI by your company

**C6 Purchases of like goods and/or goods subject to review**

1. Complete **Annex 6 – Purchases of like goods** and/or goods subject to review  
This should include information relating to your company’s total annual purchases of the like goods and/or goods subject to review over the injury period. All figures should be reported net of recoverable tax. Please list for each year every country you have purchased from in a separate row.
2. Describe how these purchases fit into your business model.

[Redacted – commercially sensitive commercial information related to business practices]

Appendix reference:

## SECTION D: Sales

### D1 – Domestic sales

1. Please complete **Annex 7 – Transaction by transaction (T by T) domestic sales**
  - These should include all your domestic sales net of returns for the like goods for the POI. Include the like goods you have produced, purchased and resold and/or goods subject to review that you have purchased and resold.
  - Please report returns as negative (-) sales figures.
  - Please ensure that you correctly categorise each sale by commodity code.
  - For transactions or invoices that consist of multiple commodity codes, the same invoice number should be referenced.

### D3 Sales reconciliation

1. Please complete the sales reconciliation table in **Annex 8 – Sales reconciliation**
2. Additionally, please complete the sales forecast table in **Annex 8 – Sales reconciliation** providing quantitative estimates (e.g., projections or forecasts) for the sales revenue and quantity of like goods and of all other goods you produce on the UK market for the next five years.

**D4 Distribution channels and price setting**

1. If applicable, please provide copies of price lists for the like goods for the POI.

[Redacted – commercially sensitive confidential information relating to Wrapex and Procure pricing]

Appendix reference:

2. If any price reductions have been applied to any of your sales of like goods over the POI, please provide a description. This includes discounts, rebates, credit terms, allowances and commissions.

- Explain the terms and conditions that must be met for any price reduction.
- Indicate any price reduction not included in an invoice price. Explain how the invoice price and the price reduction have been calculated.

3. Please provide details of your distribution network for like goods if you have one.

[Redacted - commercially sensitive confidential information relating to Wrapex and Procure pricing]

Appendix reference:

4. Do your sales usually include delivery in the price? If so, please explain how you calculate delivery costs and prices?

[Redacted - commercially sensitive confidential information relating to Wrapex and Procure pricing]

Appendix reference:

5. Does delivery price vary between customers? If this is the case then please explain what these differences may relate to.

[Redacted - commercially sensitive confidential information relating to Wrapex and Procure pricing]

Appendix reference:

**D5 Captive use**

1. For products classified for internal use in **Annex 2- Product Comparison** please specify how these goods were used

N/A
Appendix reference:

2. Please comment on whether your internal use of the like good would be affected if the existing anti-dumping measure on the goods subject to review no longer applied? Please attach evidence to support your answer where possible.

N/A
Appendix reference:

## SECTION E: Injury to your company

1. Would your company suffer from injury if the existing anti-dumping measure on the goods subject to review no longer applied? If so, please describe the nature and degree of the injury. If your company is already suffering injury, would the nature or source of the injury change if the measures were to no longer apply?

Our view is that the existing ADDs are significantly minimising the risk of injury but, if these were to be removed, dumping would be very likely to occur at scale. We also believe that we are already suffering some injury through circumvention of the ADDs, although it is difficult for us to prove this.

[Redacted – commercially sensitive confidential information relating to specific impacts upon business practices and products]

Appendix reference:

2. How would your costs to make and sell change if the existing anti-dumping measure on the goods subject to review no longer applied, what measures would your company have to take to remain competitive. If possible, please provide annual estimates (e.g., projections or forecasts) for the next five years for any changes and use the text box below to explain the methods used to calculate these estimates.

[Redacted – commercially sensitive confidential information relating to specific areas of the business and specific product descriptions]

Appendix reference:

3. Please complete **Annex 9 – Injury**. This should be completed in reference to your UK production of the like goods for the injury period.
4. Please explain how you calculated and apportioned your average net operating profit after tax (NOPAT) for the like goods.

[Redacted - commercially sensitive confidential information relating to revenue and costings of elements of specific products]

Appendix reference:

5. Please explain how you assess your stock levels. Please indicate if your stock levels were abnormally high during the injury period. If so, please explain.

[Redacted – commercially sensitive confidential information relating to stock and market trends]

Appendix reference:

6. Please explain how you estimated your percentage of market share for the like goods.

[Redacted – commercially sensitive confidential information]

Appendix reference:

7. Please explain how you calculated your production capacity and capacity utilisation for the like goods, and the cause of any significant variations

[Redacted – commercially sensitive commercial information]

Appendix reference:

8. Explain any variances between your actual and forecasted budgets over the injury period, with reference to your cash flow statements. Would your forecasted budgets be affected if the existing anti-dumping measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

[Redacted – commercially sensitive confidential information relating to the relationship between the like goods and specific products of Wrapex and Procure]

Appendix reference:

9. Please explain how you set your wages, and the causes of any significant variations.

[Redacted – commercially sensitive confidential information relating to the remuneration of employees etc.]

Appendix reference:

10. Please explain whether any of the indicators listed in **Annex 9 – Injury** would be affected if the existing anti-dumping measure on the goods subject to review no longer applied. Please substantiate your claims with evidence. Where possible, please add additional rows in **Annex – 9 Injury** to provide estimates for the next five years (e.g., projections of forecasts). Please use the text box below to explain the methods used to calculate your estimates.

[Redacted – commercially sensitive confidential information relating to specific areas of the businesses]

Appendix reference:

11. For your like goods only, please state what level of profit, before tax and as a percentage of turnover, your company would expect to achieve in the absence of injury and explain how you arrived at this figure. Would your level of profit, before tax, as a percentage of turnover for the like goods be affected if the existing anti-dumping measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

In the absence of the injury that would result from a withdrawal of the existing ADDs, we would expect the business to remain consistent.

[Redacted – commercially sensitive confidential information]

Appendix reference:

12. Explain how you set your current sales price for your like goods. Is this the same as your target sales price? If not, please explain the reasons for this. Would your sales price for your like goods be affected if the existing anti-dumping measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

[Redacted – commercially sensitive confidential information relating to the pricing and margins of specific products]

Appendix reference:

13. Complete **Annex 10 – Investments and Return on Investment**.

- For each investment category, indicate the amount of investment (apportioned, where applicable) and explain what the investment is for.
- Where possible, add columns in **Annex – 10 Investments and Return on Investments** to provide estimates (e.g., projections or forecasts) for future years assuming the measure is retained.
- For the investments you have made during the injury period, please also provide the depreciation incurred company-wide and for the like goods.

[Redacted – commercially sensitive confidential information]

Appendix reference:

14. Please provide details of your typical source(s) of finance (e.g., loans, debt, share issues, bond issues etc.) for each category of investment relating to your company-wide investments.

[Redacted – commercially sensitive confidential information relating to the financing of the business]

Appendix reference:

15. Please describe any changes in your company’s level and trends of returns on investment over the injury period. Please explain the nature and cause of this change and substantiate with supporting evidence e.g., funding proposals, loan approvals or other relevant financial documents.

No changes.

Appendix reference:

16. Please explain whether your company’s ability to make investments and/or ability to raise capital would be affected in the next five years if the existing anti-dumping measure on the goods subject to review no longer applied. Please substantiate your claims with evidence (e.g., company investment plans, etc) and if you have provided estimates explain how you calculated them.

[Redacted - commercially sensitive confidential information relating to the financing of the business]

Appendix reference:

17. Please complete **Annex 11 – Forward sales contracts**. Describe and attach copies of all forward sales contracts/ongoing supply agreements for like goods. Comment on these forward sales contracts – are they a usual way of doing business in your industry? Has there been any variation in the volume and value of forward contracts over time? If so, what has caused this variation? Would your forward sales contracts be affected if the existing anti-dumping measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

[Redacted - commercially sensitive confidential information relating to the sales practices of the business]

Appendix reference:

18. If your company is suffering from injury, please explain and indicate the degree to which this has been caused by the alleged dumping of the goods subject to review. Please also explain and indicate the degree to which any other factors might have caused the injury, for example:

- volume and prices of imports not sold at dumped prices
- contraction in demand or changes in patterns of consumption
- restrictive trade practices of, and competition between, third country and UK producers
- developments in technology; and
- export performance and the productivity of the UK.

Please substantiate your claim(s) with evidence.

Would the cause(s) or degree of injury change if the existing anti-dumping measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

While the ADD remains in place, our company is protected from injury that would result from the dumping of the goods under review.

Appendix reference:

19. Would there be any other effects on your industry and/or company if the existing anti-dumping measure on the goods subject to review no longer applied? Please substantiate your claims with evidence.

We have set out above the likely impact on our business, [Redacted - commercially sensitive confidential information relating to the financial structure of the business]. .

We expect that other domestic manufacturers of like goods, some larger than ourselves, would also struggle to continue operations and existing production would be replaced by a significant reliance on China imports. The sustainability initiatives we have invested in would be replaced by coal-fired manufacture, followed by sea-freight to the UK.

Appendix reference:

## SECTION F: Dumping

Please note that all questions in this section are optional. If you choose not to provide information to a question in this section, please state this or write 'N/A' in the respective text box.

### F1 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. This may include sales catalogues, price lists, invoices, quotes, market intelligence or sales correspondence, or any other documentation relating to the domestic price of the goods subject to review in the PRC.

No
Appendix reference:

2. Do you have any information about the export price to the UK of the goods subject to review from the PRC? Please substantiate with evidence where possible. This may include sales catalogues, price lists, invoices, quotes or sales correspondence, or any other relevant documentation relating to the export price to the UK of the goods subject to review from the PRC.

No
Appendix reference:

## F2 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.

No, but from experience of business visits to manufacturers in China and the number of manufacturers of the goods under review in China, we suspect there is a vast capacity ready to expand production and dump aluminium exports.

Appendix reference:

2. Do you know how capacity and capacity utilisation among exporters of the goods subject to review have changed during the POI, or might change in the next 5 years? Please provide evidence if available.

We do not have access to information of this nature.

Appendix reference:

3. 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. This could include:
  - exports of like goods to third countries by exporters of the goods subject to review,
  - conditions for the exporters of the goods subject to review in their domestic market,
  - information on raw material markets and prices, including any restrictions concerning raw materials used for the production of the goods subject to review,
  - attractiveness of the UK market for the goods subject to review compared to the market in third countries, and
  - any other relevant factor.Please provide supporting evidence where possible.

We do not have access to information of this nature.

Appendix reference:

### F3 Adjustments

1. If you are aware of any factors that could mean costs or profits of the goods subject to review are not substantially determined by market forces, please provide details and any supporting evidence.

We do not have access to information of this nature.

Appendix reference:

### F4 Particular market situation

1. Do you have knowledge of any market distortions in the exporting country affecting the **production of the goods** subject to review during the POI? Please describe the nature of the market distortions in detail, specifically with respect to the goods subject to review, and provide evidence to substantiate your claims.

In your response, please also include any evidence concerning the impacts of any market distortions on the cost and level of production of the goods subject to review.

We do not have access to information of this nature.

Appendix reference:

2. Please describe how any market distortions affected the **price of goods** subject to review, including any raw materials and inputs, in the exporting country during the POI. Provide examples and evidence to support your response, including any evidence concerning the following:

- situations/distortions in the domestic market of the exporting country where prices of the goods subject to review are artificially low; and
- situations/distortions in the domestic market of the exporting country where prices of the goods subject to review reflect non-commercial factors.

We do not have access to information of this nature.

Appendix reference:

3. Please describe how any market distortions affected the **level of exports** of the goods subject to review during the POI. In your response, you may refer to any international markets, which you may be aware of, that are affected by differential levels of exports of the goods subject to review by the exporting country.

Please provide evidence to support your response.

We do not have access to information of this nature.
Appendix reference:

4. Please provide any additional information which you think could assist the assessment of market distortions in the exporting country; this could include:

- situations/distortions in the domestic market of the exporting country where there is significant barter trade;
- situations/distortions in the domestic market of the exporting country where there are subsidies involved in the production of the goods subject to review;
- any other reason, which could evidence that the comparable price cannot be used to determine the normal value of the goods subject to review.

Please provide evidence to support your response.

We do not have access to information of this nature.
Appendix reference:

## SECTION G: 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.

### G1 Background

1. Please provide an overview of your upstream supply chain for the goods subject to review (e.g., producers of raw materials). Where possible, please describe the number, location and size of UK producers at each stage.

This is provided in Annex 5.  
 UK suppliers are listed in Annex 5 and they would all be affected, as would their supply chains.

Appendix reference: 5

3. 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.

[Redacted – commercially sensitive confidential information relating to business practices]

Appendix reference:

**G2 Your company**

- 4. 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.
- 5. How would these employment figures be affected if the existing anti-dumping measure was no longer to apply? Please support your claims with evidence.

[Redacted - commercially sensitive confidential information relating to the impact upon employees]. Please also refer to Injury section above.

Appendix reference:

- 6. 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.

As described above.  
Please also refer to Injury section above.

Appendix reference:

- 7. How significant is the production of the goods subject to review relative to your company's entire UK production?

[Redacted – commercially sensitive confidential information relating to production]. Please also refer to Injury section above.

Appendix reference:

### G3 Potential impacts of a measure

8. 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;

There is no evidence to suggest the retailers would reduce their prices to consumer in line with reduced imports prices as a result of the removal of ADDs. It has been widely reported that many large retailers increased their profit margins significantly during Covid-19 and the supply chain crisis in recent years. On that basis, it seems likely that such retailers would simply increase their profitability, while UK domestic manufacturing – and the security of supply that this provides – would be decimated.

Appendix reference:

- Total UK production of the goods subject to review;

Although Wrapex is not the largest UK manufacturer of like products, in our view UK production generally would no longer be viable following a withdrawal of the ADDs.

Appendix reference:

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

If ADDs were to be removed, dumping would re-commence and destroy the UK manufacturing base. In this scenario, the Chinese exporters would be left with little competition and could potentially increase prices. Accordingly, it seems unlikely that consumers would benefit if dumping were to recommence, and the overall effect on the economy would be negative given the loss of manufacturing (and associated supply chain effects) and security of supply.

Appendix reference:

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

If as we expect, UK manufacturing were to cease, so would the exports from the UK..

Appendix reference:

9. 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;

There would be an effect on UK manufacturers and services which are part of Wrapex and Procare's upstream and downstream supply chain, in addition to any future volume growth that is projected (detailed on schedule with current purchasing revenue figures). We expect that there would be an equivalent impact on the supply chain of other UK manufacturers affected by a removal of the ADDs.

Appendix reference:

- Businesses that purchase the goods subject to review;

We expect that many retailers would not pass on cost savings to customers and would instead increase their profit margins. Over time, the price of imports may be likely to rise as UK producers exit the market, reducing the competition faced by imports from China.

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); and

[Redacted – commercially sensitive confidential information]

Appendix reference:

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

We do not believe there is a viable alternative to aluminium foil products. Accordingly, we expect that the goods under review from PRC would be likely to replace the market share of UK manufacturers leaving the industry.

Appendix reference:

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

As above we do not believe there is any certainty here, both due to potential increases in cost factors and due to the profit requirements of the intermediary businesses.

Appendix reference:

11. 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.

[Redacted – commercially sensitive confidential information]

Appendix reference:

12. 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 – commercially sensitive confidential information relating to the impact on employees with protected characteristics]

Appendix reference:

13. How would the number or range of 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 - commercially sensitive confidential information]

Appendix reference:

14. How would the suppliers' ability to differentiate their products by price, quality, service or innovation 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 - commercially sensitive confidential information]

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.

We do not have access to information of this kind.

Appendix reference:

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.

We do not have access to information of this kind.

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.

In the absence of any UK manufacturing of the like goods, the choice and range available to consumers would be significantly diminished.

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.

We do not have access to information of this kind.

Appendix reference:

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

In addition to the points raised above, an important factor to consider in applying the Economic Interest Test is that the fact that a loss of UK domestic production would present significant supply chain risks to the economy in any future periods of supply chain disruption arising from geopolitical tensions, pandemics, etc.

Appendix reference:

## SECTION H: 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	YES
Section B – About your goods	YES
Section C – Costs and production	YES
Section D - Sales	YES
Section E – Injury to your company	YES
Section F – Dumping	YES
Section G – Economic Interest	YES

+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
Redacted - commercially sensitive confidential information]	Redacted - commercially sensitive confidential information]
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