



Anti-Dumping Questionnaire – Overseas Exporter Case TD0029: Certain Cast Iron Articles originating from the People’s Republic of China (PRC)

Period of Investigation (POI):	01 October 2021 – 30 September 2022
Injury Period :	01 October 2018 – 30 September 2022
Deadline for response:	6 March 2023
Contact details:	TD0029@traderemedies.gov.uk
Completed on behalf of:	<i>Qingdao Everbright Machinery Co., Ltd.</i> <i>("Qingdao Everbright")</i>

When you have completed this form, indicate the **confidentiality status** of this document by placing an X in the relevant box below and on the header to each page of this questionnaire::

- ☐ Confidential
☒ Non-confidential – will be made publicly available

Your completed response must comprise this questionnaire and the corresponding annexes. Please note that you will have to provide **Confidential** and **Non-Confidential** versions of the questionnaire and annexes, as well as of any additional



documents you append. All documents should be uploaded to the Trade Remedies Service (www.trade-remedies.service.gov.uk) by 24 February 2023.

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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.

This case is a transition review of the UK trade remedies measure set out in [Taxation Notice 2020/19](#) that gave effect to [Notice of Determination 2020/19](#) which transitioned the EU trade remedies measure to a UK trade remedies measure. The TRA's role is to consider whether the dumping of the goods, and injury to the UK industry, is likely to continue or recur if the anti-dumping measures were to be revoked.

Why should I take part?

We are asking overseas exporters and/or overseas producers of Certain Cast Iron Articles from the People's Republic of China to complete this questionnaire to inform our review of whether the current anti-dumping measure should be varied, including maintained or revoked.

If you are an overseas exporter of the goods subject to review to the UK but do not produce these goods, please complete Annex I, as well as sections of the questionnaire you are reasonably able to answer. Furthermore, please provide the case team with contact details for the company/companies that produce the goods subject to review that you export. The information your company provides will help us reach a fair and proportionate recommendation.

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 24 February 2023. We may need to issue a deficiency notice if we consider 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 at TD0029@traderemedies.gov.uk.

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 for 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 the case team as soon as possible.
- Please provide all formulae 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. 22/01/2023).
- 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, TD0029, 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 contained 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; and
- 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 review (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

Section A of this questionnaire includes detailed questions about your company structure. Although this questionnaire is intended for your company, our review 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 an exporting producer of the goods subject to review, they should **also** complete a copy of the main questionnaire. Please make sure you provide your subsidiaries with access to this questionnaire.

If your subsidiaries or associated companies are not producers but are involved in the sales and/or marketing of the goods subject to review to the UK, they should complete Annex I, as well as sections of the questionnaire they are reasonably able to answer.

If your subsidiaries or associated parties are producers but are not involved in the sales and/or marketing of the goods subject to review to the UK, they should complete the relevant sections of the questionnaire.

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 annexes 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 or remote meeting/s 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. In this case, we may do this remotely or we may visit you to conduct verification in person. The case team will contact you to make arrangements as appropriate.

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 formulae and steps used in your calculations and other related material/documentation as it may be asked for during verification.

Please indicate any dates when you would be unable to host remote verification.

Please answer here

Appendix reference:

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.



The scope of this review

Goods subject to review

This **Transition Review** covers **Certain Cast Iron Articles** originating from **The People's Republic of China (PRC)** described as:

Articles of lamellar graphite cast iron (grey iron) or spheroidal graphite cast iron (also known as ductile cast iron) and parts thereof. These articles are of a kind used to:

- cover ground or sub-surface systems, and/or openings to ground or subsurface systems
- give access to ground or sub-surface systems and/or provide view to ground or sub-surface systems

The articles may be machined, coated, painted and/or fitted with other materials such as but not limited to concrete, paving slabs, or tiles.

The following product types are excluded:

- channel gratings and cast tops subject to standard EN 1433, to be fitted as a component on channels in polymer, plastic, galvanised steel or concrete allowing surface water to flow into the channel
- floor drains, roof drains, cleanouts and covers for cleanouts, subject to standard EN 1253
- step irons, lifting keys, and fire hydrants.

These goods are currently classifiable within the following CN codes 73 25 10 00 31 and 73 25 99 10 60. These CN 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 export sales to the UK of the goods subject to review, this questionnaire will also ask about your sales of like goods in your domestic market and to third countries. 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.

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



relating to the completion of the annexes can be found within the relevant annex.

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.

Our PCN table is provided below.

PCN Table

Category	Field Format	Sub-category Format	Explanation
1. Product Type	1, text	A	Access covers giving access to underground mains such as sewage networks, cable networks, metering equipment (wet and/or dry systems). This product type includes manhole covers and modular elements such as duct covers for application in e.g. airports, ports, manufacturing industries
		S	As in "A", but sealed
		G	Gully top or channel grating (acting as rain water run-off collectors, used to channel rainwater towards sewage networks: devices for such purposes are grates, collectors and gully tops)
		B	Surface box (used mainly for carriageways and roads, public or private, shopping areas, open-air car parks, kerbside areas between roads and pavements, pavements, and multi-storey car parks)
2. Loading Class	1, text	O	if the product can bear a test load between 0 and 14 kN
		A	if the product can bear a test load between 15 and 124 kN



		B	if the product can bear a test load between 125 and 249 kN
		C	if the product can bear a test load between 250 and 399 kN
		D	if the product can bear a test load between 400 and 599 kN
		E	if the product can bear a test load between 600 and 899 kN
		F	if the product can bear a test load of 900 kN and above
		Z	not relevant
3. Raw Materials			
3.1 For Frame & Cover	1, text	D	Ductile iron
		G	Grey iron
		C	Parts from both grey iron and ductile iron
3.2 Concrete or other material in the frame	1, text	N	Frame without concrete or other materials
		C	Frame combined with concrete or other materials
3.3. Concrete or other material in the cover	1, text	N	Cover without concrete or other materials
		C	Cover combined with concrete or other materials
4. Shape and Frame			
4.1 Frame Shape	1, text	C	Round (circular)
		R	Rectangular (including square)
		O	Other (e.g. triangular, hexagonal)
		M	If there is more than one cover in the frame
		P	If the product consists of one piece (i.e. no separate frame and cover)
4.2 Clear opening area	4, numeric/text	Specify the dimensions of the clear opening area in dm(1dm =100mm) :	
			If the opening is round, specify the diameter in dm's (to the nearest dm), and then add "rd" to complete the four digit parameter; e.g. 600mm = 6dm = "06rd"



			In other products, consisting of more than one piece, specify the dimensions of the two sides rounded to the nearest dm; e.g. 1210mm x 685mm = 12dm x 7dm = "1207" (the longer dimension first). In case of more than one clear opening area, please give total opening surface.
			In case the product consists of one piece which cannot be opened, specify the dimensions of the two outer (top)sides rounded in dm (the longer dimension first)
4.3 Frame depth	2, numeric		Specify the depth of the frame in cm (in case of decimals round to the closest cm); e.g. 115 mm = 12cm = "12"
			For kerb gully grating and frame, specify the depth of the part of the product that is placed on the footway in cm
5. Special features			
5.1 Hinges	1, text	Specify whether covers are equipped with hinges for facilitating lifting operations :	
		H	equipped with hinges
		U	not equipped with hinges
5.2. Securing feature or locking accessory according to EN124	1, text	Specify whether there is a securing feature or locking accessory:	
		S	securing feature or locking accessory or both
		F	no securing feature or locking accessory
6. Standard	1, numeric	Indicate whether the casting complies with any standard :	
		1	if the product is in compliance with the norm EN 124



		2	if the product is in compliance with the norm EN 1433
		3	if the product is in compliance with other standards, i.e. national, others
		0	if the product is not in compliance with any standard

Example of a product control number:

By way of example, the product sealed round-framed man-hole cover made fully of ductile iron with a round opening of 650 mm and a frame depth of 115 mm, which could bear a test load of 500 kN, without hinges, with a lock, compliant with the European norm EN 124 would result in a PCN of:

SDDNNC07rd12IS1

Note: do not use any separator within the PCN code.

In this questionnaire and the corresponding annexes, you will be asked to construct PCNs representing the different types of products you produce. When providing your PCNs, please do not use any spaces, dashes, or other means of separation, and ensure you follow the order of characteristics outlined in the table above. Please use this PCN structure consistently throughout your questionnaire response, including the corresponding spreadsheet annex.

1. Please provide details of any technical or physical characteristic not included in the PCN structure that may affect the price comparison between products.

Answer:

Not applicable. There are no technical or physical characteristic not included in the PCN structure that may affect the price comparison between products.

2. Please comment on the suitability of the PCN structure in regard to your product range. This may include areas such as:
 - categorisation of features,
 - number of products included under “Other” which may exclude a fair comparison, and
 - specialised products which may unduly influence the comparison.

Answer:

Qingdao Everbright does not have any comment on the suitability of the PCN structure.



3. Please provide details of any manufacturing process differences which you feel may influence the PCN structure and the price comparison between the goods subject to review and the like goods.

Answer:

None.

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:	Qingdao Everbright Machinery Co., Ltd. (“Qingdao Everbright”)
Legal structure (e.g. limited company, sole trader, partnership etc):	Limited liability company
Year of establishment:	2008
Other operating names:	Not applicable
Company registration number:	913702026717936380
Place of registration:	Qingdao City
Name (point of contact):	[redacted – contains personal information]
Position:	General Manager
Address:	Room OP, 8th Floor, No. 39, Donghai West Road, Shinan District, Qingdao City, Shandong Province, China
Telephone No:	[redacted – contains personal information]
Email:	[redacted – contains personal information]
Website:	www.castingsqd.com



- If you have appointed an external party to act on your behalf in this investigation, please provide their details and attach a letter confirming the TRA should contact them directly:

Name:	East & Concord Partners
Address:	19th Floor, Landmark Tower 2, 8 North Dongsanhuan Road, Beijing 100004, China
Telephone No.:	[redacted – contains personal information]
Email:	[redacted – contains personal information]
Confirm they have signed authority to act (Yes/No):	Yes

Answer:

Please refer to [Appendix A-1.2](#) for Letter Authorising Representation.

A2 About your company

- Describe the role of your company in relation to exports of the goods subject to review to the UK market (e.g. producer, producer/exporter or exporter/distributor). Please make it clear whether you are a producer, and if you are not, please contact us within seven days with details of the producers that supply you.

Answer:

Qingdao Everbright is not a producer, but a trader of the goods subject to review. It sold the goods subject to review to the UK market during the IP. During the period of investigation, Qingdao Everbright has exported the goods concerned manufactured by its associated producer Shandong Heshengda Machinery Technology Co., Ltd. (“Heshengda”) to UK. Heshengda has completed a separate questionnaire response to coordinate with Qingdao Everbright.

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

Answer:

Not applicable. There is no change in the legal form of Qingdao Everbright over the past five years.



3. List and explain all authorisations your company has been required to obtain to produce, sell, or to export the goods subject to review. 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.

Answer:

Not applicable. Qingdao Everbright has not been required to obtain any authorisations in order to sell, or to export the goods subject to review.

There are no direct or indirect quantitative or other restrictions on any of these activities.

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

Answer:

Not applicable. Qingdao Everbright is not a producer and does not conform to any production standards.

5. 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.

Answer:

No, Qingdao Everbright is not a member of any representative organisations.

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) and 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 complete **Section A – Company structure and operations**, subsection **A3 – Organisational structure** of **Annex II** for your company's worldwide corporate structure and affiliations.

Answer:

Please refer to [Appendix A-3.1](#) for the A3 – Organisational structure.



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 production, sale, R&D, supply and distribution of the like goods, goods subject to review or other goods you produce.

Answer:

Please refer to [Appendix A-3.2](#) for the Internal Organisational Chart.

A4 Board members and principal shareholders

1. Please complete **Section A – Company structure and operations, subsection A4 – Owners and shareholders of Annex II** for:
 - a. all your company's shareholders that owned more than 5% of its shares during the POI, 01 October 2021 – 30 September 2022;
 - b. the Board of Directors during the POI, 01 October 2021 – 30 September 2022.

Answer:

Please refer to [Appendix A-4.1](#) for A4 – Owners and shareholders.

2. Explain your procedure for appointing the members of the Board of Directors.

Answer:

Qingdao Everbright has an executive director, who is elected by the shareholders' meeting in proportion to the shareholders' capital contribution and by a show of hands.

3. If applicable to your company, please attach the latest copy of the following documents (in the original language and in English):
 - articles of association and all related documents;

Answer:

Please refer to [Appendix A-4.3.a](#) for Articles of Associations.

- business licence;

Answer:

Please refer to [Appendix A-4.3.b](#) for Business Licences.



- proof of registration of the company with the competent authorities.

Answer:

Please refer to [Appendix A-4.3.c](#) for Proof of Registration of Qingdao Everbright.

Please describe what you are submitting and provide appendix references for your attachments in the box below. Earlier copies from the date of establishment of the company until the present should be available upon request during any verification visit or remote verification meeting.

Answer:

The description has been provided in the answers above.

A5 Operational links with other companies or persons

1. Complete the table below if your company has established long term agreements or relationships with any company/companies located in the UK, the PRC or in third countries for the production (e.g. sub-contracting), supply and sale of the like goods, or other licensing, technical patent or compensatory agreements.

If your company has long-term agreements with other companies/persons for the supply of goods destined for internal sale, e.g. captive use, please provide the contract to demonstrate this.

Company name and address	Nature of agreement	Company registration number and place of registration	Appendix Number of contract
		Appendix reference	

+Add additional rows as required.

Answer:



Not applicable. Qingdao Everbright has not established long term agreements or relationships with any company/companies located in the UK, the PRC or in third countries.

A6 Accounting practices

1. Give the address where your company's accounting records are kept. 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?
Room OP, 8th Floor, No. 39, Donghai West Road, Shinan District, Qingdao City, Shandong Province, China	All the accounting records

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.

Answer:

Qingdao Everbright's financial year is the calendar year, i.e., from January 1 to December 31. There is no change occurred in its accounting practices over the last four financial years.

3. For your company and any associated parties involved in the production, marketing or sales of the goods subject to review, please attach a copy of your annual accounts covering the Injury Period 01 October 2018 – 30 September 2022 including the financial statements and audit reports.

Answer:

Not applicable. The accounts of Qingdao Everbright are not audited.

4. If your accounts are unaudited, please attach a copy of your unaudited financial statements for the Injury Period 01 October 2018 – 30 September 2022.

Answer:

Please refer to Appendix A6.4 for Financial Statements.



5. Please attach a copy of your company's trial balance (in original and spreadsheet form) covering the POI (1 October 2021 – 30 September 2022). If your financial year is fully aligned with the POI, this is all that is required.

Where your financial year is not aligned with the POI, please additionally provide three trial balances (in original and spreadsheet form) to cover a continuous period from the beginning of the financial year that ends during the POI to the end of the POI, without overlaps.

This includes:

- the trial balance for the period starting at the beginning of the financial year and ending 30 September 2021;
- the trial balance which starts on 01 October 2021 and finishes at the end of the next financial year; and
- the trial balance which starts at the beginning of the following financial year and ends on 30 September 2022.

Answer:

Please refer to [Appendix A6.5](#) for Trial Balance.

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

Answer:

Not applicable. There are no management reports for the profit centre that includes the goods subject to review or like goods.

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

Answer:

Not applicable. Qingdao Everbright does not have consolidated accounts.

8. Please provide a detailed description of your financial accounting system, explaining how sub-ledgers (e.g. costing, debtors, creditors) and other sales or



production systems integrate with the general ledger. Please provide a description of how it links to the management accounting system, including any manual interventions. Please also attach:

Answer:

Qingdao Everbright only has a financial accounting system. The total of sub-ledgers is equal to the general ledger.

- your company's chart of accounts; and

Answer:

Please refer to Appendix A6.8 for Chart of Accounts.

- your company's cost centres.

Answer:

Not applicable. Qingdao Everbright does not have cost centres.

9. Have you changed your financial policies during the Injury Period (01 October 2018-30 September 2022)? If so, please explain those changes, including dates, reasons, and the financial impact against the goods subject to review and/or like goods.

Answer:

No. Qingdao Everbright has not changed its financial policies during the Injury Period.

A7 Your company's products

Please complete **Section A – Company structure and operations**, subsection **Your company's products, Annex II**.

1. For the goods subject to review please describe your company's Company Control Number (CCN) system. Please indicate how your own internal codes correspond to the PCNs provided in the section above on Product Control Numbers.

Answer:



Not applicable. Qingdao Everbright does not have Company Control Number (CCN) system.

2. If your company does not use the same product codes across production, sales and invoicing please explain how they differ.

Answer:

Not applicable. Qingdao Everbright does not have Company Control Number (CCN) system.

3. If there are differences in characteristics between your range of goods subject to review and your 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.

Answer:

Not applicable. There are no differences in characteristics between range of goods subject to review and like goods of Qingdao Everbright.

4. In relation to the technical, physical and other relevant factors, how are the products you export different from those produced in the UK. Please provide a general explanation here and complete the relevant sections of **Section A – Company structure and operations**, subsection **A7.1 – Your company's products**, **Annex II** where possible.

Answer:

Not applicable. The products Qingdao Everbright exports are not different from those produced in the UK.

5. For each type of the like goods sold on your domestic market and the goods subject to review destined for consumption on the UK market, please provide a technical description as well as translated sales brochures. Please also provide information on:
 - technical characteristics;
 - physical characteristics; and
 - any other important factors.

Answer:

Not applicable. Qingdao Everbright does not have its own sales brochures.



6. Describe all other goods produced or sold by your company in the UK, providing a name and description. If appropriate, please group them by type/range. Please complete **Section A – Company structure and operations, A7.2 – Other goods, Annex II.**

Answer:

Please refer to [Appendix A-7.6](#) for A7.2 – Other goods.



SECTION B: Sales

Please coordinate the responses to each of the relevant sections in this questionnaire with your associated companies and ensure that the sales information for your associated companies to independent customers reconciles fully with the information given.

B1 Sales

1. Please complete **Section B – Sales, subsection B1.1 – Upwards sales reconciliation, Annex II.**

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

Answer:

Please refer to [Appendix B-1.1](#) for B1.1 – Upwards sales reconciliation.

B2 Captive sales

If your company has sales of the like goods / Good Subject to Review that are made between associated companies for further processing, transformation, or assembly (captive sales) please complete **Section B – Sales, subsection B2 – Captive sales.**

Answer:

Not applicable. Qingdao Everbright has no captive sales.

B3 Sales

1. Please describe your company's channels of distribution, highlighting any differences between the domestic market and exports to the UK

Answer:



Qingdao Everbright purchase the product concerned from its associated producer Heshengda and then exports the goods subject to review directly to UK independent customer.

Qingdao Everbright has no sales in the domestic market.

2. Please explain how you have categorised customers in your sales data, highlighting any differences between the domestic market and exports to the UK.

Answer:

Qingdao Everbright only has one UK customer, and it categorised the customer based on daily communication with the customer.

Qingdao Everbright has no sales in the domestic market of the goods subject to review.

3. Please provide your terms of sale and pricing to each customer category (e.g. traders, distributors, wholesalers, industrial users, end users, etc.), including associated companies.

Answer:

Qingdao Everbright only has one UK customer, which is an end user. The term of sale for this customer is [redacted – commercially sensitive information].

Qingdao Everbright has no sales in the domestic market of the goods subject to review.

4. Describe each step in the sales negotiation process, from the first contact with the customer up to and including any after-sale price adjustments (commissions, discounts, rebates and allowances). Please include a description of how the process varies for different customer categories.

Answer:

The sale negotiation process usually begins [redacted – commercially sensitive information].

Qingdao Everbright does not have any after-sale price adjustment.

Qingdao Everbright only has one UK customer.

5. Please describe in detail how the contracts, prices and quantities are agreed in accordance with sales made in long or short-term contracts. Describe the types of contracts applicable to the goods subject to review, including the terms, price changes and renegotiation by either side, etc. Explain the requirements on either party, should the contract be terminated early.



Answer:

Not applicable. The sales of Qingdao Everbright to UK were not made in long or short-term contracts.

6. Please explain production scheduling, such as whether production begins after the customers have established their product specifications (contract/order) and the sale has been made, or according to normal company production schedules.

Answer:

Not applicable. Qingdao Everbright is a trader and does not produce any products. Please refer to the questionnaire response of Heshengda.

7. Provide copies of all price lists applicable during the POI (01 October 2021 – 30 September 2022) for all customer types in the UK, including those used by associated companies. Explain your pricing procedure and whether sales prices differ between or among grades, types or specifications of the goods subject to review or among customers, regions or time periods.

Answer:

Not applicable. There are no price lists applicable for exports to UK.

Sales prices may differ among regions or time periods.

8. For all sales through associated companies, please provide a detailed description of how sales are made, detailing the procedure followed between time of order and delivery to the first independent customer. Please explain how the invoicing and payments are made.

Answer:

Not applicable. Qingdao Everbright does not sell the goods subject to review through associated companies.

B4 Sales Transactions

B4.1 UK Sales

In this part, you must provide complete information on sales of the goods subject to review exported by your company to the UK during the POI. (01 October 2021 – 30 September 2022.)



1. Please provide the sales information for your company's sales to all customers in the UK in **Section B – Sales**, subsection **B4.1 – Sales to the UK, Annex II**. For instructions on filling out and explaining the adjustments for sales to the UK, please see **Section C**, subsection **C1 – Adjustments for export sales to the UK**.
 - Report each good sold on a given invoice with a different PCN (see Section A on Product Control Numbers) or invoice line, as a separate transaction. If there are any other sales costs, charges or expenses incurred which have not been identified in the table above, add a column for each item (see 'other factors'). For example, other particular selling expenses incurred.

See Section C for further information on how to record adjustments in this table.

Answer:

Please refer to [Appendix B-4.1](#) for **B4.1 – Sales to the UK**.

2. If your sales have not been made on a CIF basis, explain below how you have calculated the CIF values included in the 'CIF value in accounting currency' column in **Section B – Sales**, subsection **B4.1 – Sales to the UK, Annex II**.

Answer:

Not applicable. Qingdao Everbright made its sales on a [redacted – commercially sensitive information] basis.

3. Please list any costs incurred by your associated companies which have been paid or reimbursed by your company, directly or indirectly linked with the goods subject to review. In detail, explain the types of costs listed.

Answer:

Not applicable. There is no cost incurred by Qingdao Everbright's associated companies.

4. Select two invoices from two different customers regarding sales to the UK during the POI (01 October 2021 – 30 September 2022.) Provide a complete set of documents for these sales. For example:
 - purchase order;
 - order acceptance;
 - commercial invoice;
 - applicable discounts or rebates;



- credit/debit notes;
- long or short-term contract of sale;
- inland freight contract;
- bank documents showing proof of payment;
- details of any tax rebates; and
- documents relating to transport at CIF or DDP.

Answer:

Please refer to [Appendix-B4.1.4](#) for Export documents to UK customers.

B4.2 Domestic sales

In this part, you must provide complete information on sales of the like goods made by your company to independent and associated customers on the domestic market during the POI (01 October 2021 – 30 September 2022.)

1. Please provide the sales information for your company's sales to all customers in the PRC in **Section B – Sales**, subsection **B4.2 – Domestic sales, Annex II**. For instructions on filling out and explaining the adjustments for domestic sales, please see **Section C**, subsection **C2 – Adjustments for domestic sales** (below).

Report each goods sale on a given invoice with a different PCN (see Section A on Product Control Numbers) or invoice line as a separate transaction.

If there are any other sales costs, charges or expenses incurred which have not been identified in the table above, add a column for each item (see 'other factors'). For example, other particular selling expenses incurred.

See Section C for further information on how to record adjustments in this table.

Answer:

Not applicable. Qingdao Everbright does not have sales of the like goods on the domestic market during the POI.

2. Select two invoices from two different customers regarding sales to domestic customers during the POI (01 October 2021 – 30 September 2022.) Provide a complete set of documents for these sales. For example:
 - purchase order;
 - order acceptance;
 - commercial invoice;
 - applicable discounts or rebates;



- credit/debit notes;
- long or short-term contract of sale;
- inland freight contract; and
- bank documents showing proof of payment.

Answer:

Not applicable. Qingdao Everbright does not have sales of the like goods on the domestic market during the POI.

B5 Currency conversions

To compare export sales prices with domestic sales prices, a conversion of currency will be required.

1. Please provide the actual exchange rates used by your company for converting the payment for export sales into your accounting currency during the POI (01 October 2021 – 30 September 2022.)

Answer:

Please refer to Appendix-B5.1 for Exchange Rates for Currency Conversion.

B6 Sales to other countries

1. Please complete **Section B – Sales**, subsection **B6 – Export sales to third countries, Annex II** providing total sales, by destination country, for your like goods which are exported.

Answer:

Please refer to Appendix B6 for B6 – Export sales to third countries.



SECTION C: Fair comparison

If the TRA decide that it is appropriate to recalculate, we will conduct a fair comparison between the normal value and the export price of the goods subject to review. In some cases adjustments may be required. When you make any adjustment claim, you will need to show how the issue you raise affects price comparability.

In Section C, please give details of any adjustments you want to claim and information you can provide to verify these adjustments. Please keep a record of the information you provide to facilitate subsequent verification.

This section is divided into subsections **C1 – Adjustments on export sales to the UK** and **C2 – Adjustments on domestic sales in the PRC**. Please complete questions which relate to adjustments you wish to claim and report all charges in your accounting currency.

C1 Adjustments on export sales

Please make adjustments for each transaction in the relevant columns of the transaction-by-transaction lists requested in **Section B – Sales**, subsection **B4.1 – Sales to the UK Annex II**. The following questions relate to the adjustments provided in this annex. If they are not applicable, then please state this in the relevant box.

1. Please detail your policy for granting discounts and rebates to customers in the UK and to third countries.

Answer:

Not applicable. Qingdao Everbright does not grant discounts and rebates for export sales to the UK or to third countries.

2. If discounts or rebates vary by customer category, please explain separately the discounts and rebates given to each category.

Answer:

Not applicable. Qingdao Everbright does not grant discounts and rebates for export sales to the UK or to third countries.



3. Please explain how you have quantified each of the charges included under transportation, insurance, handling, loading and ancillary costs. Identify the general ledger account(s) where each expense is recorded.

Answer:

The UK export sales of Qingdao Everbright during the IP were made on the [redacted – commercially sensitive information] basis.

The transportation, insurance, handling, loading and ancillary costs have been reported in [Appendix B-4.1](#) B4.1 – Sales to the UK.

The above-mentioned costs are recorded in the ledger of operating expenses.

Please refer to [Appendix-B4.1.4](#) for the invoice for transportation cost. The invoice includes ocean freight, ocean insurance and handling & ancillary expenses. The above-mentioned transportation cost has been reported based on the actual amount for the shipment and allocated to each transaction on the basis of sales volume.

The expenses are recorded in the ledger of selling expenses.

4. Credit refers to the cost of the time the buyer is given to pay for the goods, as typically agreed in the terms of payment. An adjustment is warranted when credit terms for export sales differ from the credit terms for domestic sales. A credit adjustment must be made even if funds are not borrowed to finance the accounts receivable.

Please explain how the interest rates are decided and the basis on which they are used.

Answer:

Qingdao Everbright uses the benchmark interest rate for short-term borrowings issued by the People's Bank of China (4.35%) to calculate the credit costs.

5. The TRA needs to understand:

- differences in after sales costs;
- differences in commissions paid regarding sales under consideration; and
- any other adjustments made for differences not provided for in the above.

As such, please state:



- the basis of the adjustment(s); and
- how those adjustments are reported.

Answer:

Not applicable. There are no after sales costs, commissions or any other adjustments.

C2 Adjustments on domestic sales

Qingdao Everbright does not sell like goods in the domestic market, thus the questions of Part C2 are not applicable.

Please make adjustments for each transaction in the relevant columns of the transaction-by-transaction lists requested in **Section B – Sales, B4.2 – Domestic sales, Annex II**. All charges must be reported in your accounting currency.

1. Please describe in detail your policy for granting discounts and rebates to customers in your country.

Please answer here

Appendix reference:

2. If discounts or rebates vary by customer category, please explain separately the discounts and rebates given to each category.

Please answer here

Appendix reference:

3. Please explain how you have quantified each of the charges included under domestic freight. Identify the general ledger account(s) where each expense is recorded.

Please answer here

Appendix reference:



4. An adjustment can be made to take account of differences in physical characteristics between the goods sold in the UK and similar types sold in the domestic market.

Please provide a full explanation of each difference identified.

Please answer here

Appendix reference:

5. An adjustment can be made for differences in levels of trade where the export price (including a constructed export price) is:
- at a different level of trade from the normal value; and
 - the difference has affected price comparability.

Please explain how you have calculated this adjustment.

Please answer here

Appendix reference:

6. Please explain the basis on which you calculated any adjustments to packing costs.

Please answer here

Appendix reference:

7. For adjustments for import charges, please do the following:
- Provide original and English translations of statutes and regulations authorising duty drawback on exported goods and the governing methods used to calculate duty drawback.

Please answer here

Appendix reference:

8. Please explain the method you used to connect the duty drawback amount to the specific UK sale and to third country sales.



Please answer here

Appendix reference:

9. Please explain the association between the amount received from the government when you export, and the amount paid for imported materials.

Please answer here

Appendix reference:

10. List all indirect taxes imposed on the products sold in the domestic market which were either rebated upon exportation or not collected on the products exported to the UK and to third countries.

Please answer here

Appendix reference:

- For each tax listed above, provide English translations of statutes and regulations authorising the collection of the tax, including documents explaining the method of calculation, assessment, and payment of the tax.

Please answer here

Appendix reference:

- For each tax listed above, separately provide information on the tax base or taxable price, the tax rate, the amount of taxes assessed, any deductions or offsets to the tax and the formula used to calculate the tax amount.

Please answer here

Appendix reference:

- Specify when you are legally obligated or liable for tax payment. Report when you actually paid taxes and whether you maintain separate accounts for these taxes.



Please answer here

Appendix reference:

11. Credit refers to the cost of the time the buyer is given to pay for the goods, as typically agreed in the terms of payment. An adjustment is warranted when credit terms for export sales differ from the credit terms for domestic sales. A credit adjustment must be made even if funds are not borrowed to finance the accounts receivable

Please explain how the interest rates are decided and the basis on which they are used.

Please answer here

Appendix reference:

12. Please provide, for any after sales costs adjustment reported, the relevant sales contracts and how you calculated the expenses (for example, 'Warranty and Guarantee expenses' and 'Technical assistance and other services'), including the basis of any allocations. Include a record of expenses incurred. Technical services include costs for service, repair, or consultation. Where these expenses are closely related to the sales in question, an adjustment will be considered. Identify the ledger account where the expense is located.

Please answer here

Appendix reference:

13. If commissions paid to independent or associated sellers were reported explain the terms under which commissions are given.

Please answer here

Appendix reference:

14. If an adjustment has been included for other factors not provided for above, please provide a description of the adjustment, an explanation of why it has been included and the basis of its calculation.



Please answer here

Appendix reference:



SECTION D: Costs and performance

D1 Turnover

1. Please complete **Section D – Costing Information**, subsection **D1 – Turnover**, **Annex II** by reporting your total sales after all discounts and excluding taxes, for the Injury Period.
 - If your company accounts are consolidated with accounts of associated companies, create a copy of the table to report **total group** turnover.
 - The total turnover must reconcile with the turnover in your financial reporting (accounts).

Answer:

Please refer to [Appendix D1.1](#) for **D1 – Turnover**.

D2 Statement of profit and loss and other comprehensive income

1. Complete **Section D – Costing information**, subsection **D2 – Income statement**, **Annex II** with information about all the goods your company produces, for the Injury Period. This includes all the goods your company manufactures or trades in, not simply the like goods produced for your domestic market or export to third countries (*i.e.*, countries other than the United Kingdom) and the goods subject to review for your exports to the United Kingdom

Answer:

Please refer to [Appendix D2.1](#) for **D2 – Income statement**.

2. Complete **D10.1 - CTM All goods**

Answer:

Not applicable. Qingdao Everbright is a trader and does not produce any products.



3. Please attach copies of your (corporate) income tax statements, any other company tax statements and the corresponding tax returns for the POI and the preceding three financial years. (01 October 2018 – 30 September 2022)

Answer:

Please refer to [Appendix-D2.3](#) for Income Tax Declaration and VAT Declaration.

D3 Production

Qingdao Everbright does not produce any goods, thus the questions of Part D3 are not applicable.

1. Please provide a description of your company's production facilities. List all facilities involved in the production process, explaining the production activities at the major facilities and whether any stages are subcontracted.
2. Describe each stage of the production process of the goods subject to review as produced and sold by your company. To support this, please attach a complete flowchart of the production cycle.
3. Describe the main inputs to the production process and whether the supplier is associated or not. Specify whether these input materials or parts were imported, and whether the input value includes import charges and indirect taxes (for both exported and domestic types).
4. List any products produced by your company in the same facilities as the goods subject to review and/or like goods, and comment on your ability to switch production.

D4 Upwards cost reconciliation

Qingdao Everbright does not produce any goods, thus the question of Part D4 is not applicable.

1. Complete **Section D – Costing information**, subsection **D4 – Upwards cost reconciliation, Annex II**.

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



D5 Capacity

Qingdao Everbright does not produce any goods, thus the question of Part D5 is not applicable.

1. Complete **Section D – Costing information**, subsection **D5 – Capacity, Annex II**.

Explain your calculation of the capacity and the capacity utilisation for the goods subject to review. What is the basis for calculating your capacity? (For example, number of shifts, working days per year, name plate versus actual capacity, idle time for machinery maintenance and changes in the production process, etc.)

D6 Stocks

Qingdao Everbright is a trader and does not have stocks, thus the question of Part D6 is not applicable.

1. Complete **Section D – Costing information, D6 – Stocks, Annex II**. Explain the difference between your own production and purchased goods.
2. Please comment on the level and trend of stocks that you have reported above.

D7 Joint products and by-products

Qingdao Everbright does not produce any goods, thus the questions of Part D7 are not applicable.

1. Please explain any waste, scrap or by-products related to the production of the goods subject to review and the like goods. Please explain:
 - how you differentiate your waste, scrap, and by-products;
 - what you do with your waste, scrap, and by-products;
 - how any income or cost from waste, scrap, and by-products is recorded; and
 - the average waste, scrap, and by-product ratio resulting from the production process of the goods subject to review and like goods.



2. Please identify any products which share a joint process with the goods subject to review and/or the like goods which you produce. Please indicate at which point in the manufacturing process the products diverge.
3. Please explain how your costs of production (per unit) differ between the goods subject to review and/or the like goods and its joint products, if any, at the point of divergence. Comment on the reason for this difference and explain your method(s) of calculation.

D8 Purchases

1. Please complete **Section D – Costing information**, subsection **D8 – Purchases of like goods, Annex II**, showing purchases by total value exclusive of VAT and net of credit notes and trade discounts (discounts immediately deducted on the invoice) received from suppliers.

Answer:

Please refer to [Appendix D8.1](#) for D8 – Purchases of like goods.

2. Within your company, do you use any integrated processes in the production of the goods subject to review? If so, please explain.

Answer:

Not applicable. Qingdao Everbright is a trader and does not produce the goods subject to review.

D9 Profitability and administration, selling and general costs

1. Please complete **Section D – Costing information**, subsection **D9 – Profitability, Annex II**.

Answer:

Please refer to [Appendix D9.1](#) for D9 – Profitability.



2. Please explain how you calculate profitability for the goods subject to review/like goods, referring to your accounting and bookkeeping methods. Attach a breakdown to show how you have calculated the figures in **D9 – Profitability**.

Answer:

The profitability was calculated by deducting the cost for sales and SG&A from the sales revenue to get the profit, and then calculate the percentage of profit in the sales revenue.

Please refer to [Appendix D9.2](#) for the breakdown of profitability.

D10 Cost to make (CTM)

Qingdao Everbright does not produce any goods, thus the questions of Part D10 are not applicable.

1. Please provide the CTM for all goods produced. Additionally, please provided the CTM of like goods sold on your domestic market by PCN by completing **Section D – Costing information**, subsection **D10.1 – CTM All Goods**.
 - For each associated party, make a new copy and complete the spreadsheet annex separately.
 - Note that subheadings of each line item (e.g. raw materials, energy) can be changed to suit the categorisation of your own cost accounting system.
2. If there are differences in production costs for the same PCN between your like goods and the goods subject to review, explain the reasons for the differences.

Please answer here

Appendix reference:

3. Please state the cost allocation method for each cost subheading used to allocate costs against individual PCNs (e.g. units, tonnes, labour hours etc,) and other products produced in the same facility.

Please answer here

Appendix reference:

4. If the cost allocation method for your other goods produced differs from the method explained in (3) above for the like goods/goods subject to review, then



please explain the relative differences in how you have allocated costs between the two groups.

Please answer here

Appendix reference:

5. If your company incurred any extraordinary costs (such as start-up or ramp up costs) during the POI (01 October 2021 – 30 September 2022,) please provide details of these costs, explaining why they were extraordinary and how they have been included and amortised in your accounts.

Please answer here

Appendix reference:

5. Please explain how you finance your production of like goods, your sources of finance, whether there is any cost of finance associated with the production of like goods, and how you have reported this in the cost to make figures and company accounts.

Please answer here

Appendix reference:



D11 Administrative, Sales and General (AS&G) costs in the PRC

1. Please provide administrative, sales and general (AS&G) costs for all goods sold on all markets, and the like goods for your domestic market at PCN level, by completing **Annex II, D11.1 – AS&G**.
 - Provide details for each cost type of goods produced during the POI (01 October 2021 – 30 September 2022,) by your company or an associated party.
 - Note that subheadings of each line item (e.g. sales commissions, supply and client) must be changed to suit the categorisation of your own cost accounting system.

Answer:

Please refer to Appendix D11.1 for D11.1 – AS&G.

2. Please explain the cost allocation and apportionment method used for each cost type for the POI (01 October 2021 – 30 September 2022,) including an explanation of that the allocation and apportionment method under each cost type.

Answer:

The costs are allocated based on sales revenue.

3. If there are differences in costs for the same cost type between your goods subject to review and like goods explain the reasons for the differences.

Answer:

Not applicable. There are no differences in costs for the same cost type between goods subject to review and like goods

4. If the cost allocation method for your other goods sold differs from the method explained in (3) above for the like goods/goods subject to review, then please explain the relative differences in how you have allocated costs between the two groups.

Answer:



Not applicable.

D12 Raw material (RM) and input purchases

Qingdao Everbright does not produce any goods, thus the questions of Part D12 are not applicable.

1. Please complete **Section D – Costing information**, subsection **D12 – RM purchased, Annex II** detailing the RM and input purchases during the POI (01 October 2021 – 30 September 2022.)

Please provide an invoice and any supporting documents for two of your purchases stated within D12. Use the box below to give an overview of any supporting documents provided.

2. If you purchase materials or inputs from associated suppliers, please provide information about how prices are set, the negotiation process on price setting; and any contracts or evidence of price negotiation. Also, in addition to the 'Cost to make (CTM)' sheets for Domestic sales (D10.1), please provide the cost to make of the material by the associated suppliers on the same basis by adding in a column to the 'raw materials and input purchases' sheet (D12), labelling it as 'Associated supplier CTM'.
3. For material costs purchased from independent companies, explain the nature of contractual arrangements. State whether the material costs include transportation charges, duties and other expenses normally associated with obtaining the materials used in production.



D13 Specificities regarding the exporting country

Particular Market Situation (PMS)

The Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019, Regulation 7(1) details that the TRA must use the comparable price to determine the normal value unless it is not appropriate to use that price.

Regulation 7(2) states that it is not appropriate to use the comparable price to determine the normal value of the goods subject to review where, (r.7(2)(b)) because of a particular market situation, such sales do not permit a proper comparison between the like goods destined for consumption in the exporting country or territory and the goods subject to review.

Regulation 7(4) (a) and (c) state that a particular market situation includes situations where prices are artificially low or reflect non-commercial factors.

In their pre-sampling questionnaire submissions, UK producers of the like goods have alleged that a particular market situation (PMS) exists in the Certain Cast Iron Articles industry.

If found, the presence of PMS would denote that normal value has not been naturally shaped by market forces, as a result of existing or historic distortions to costs and profits.

1. In relation to the allegation of the existence of a PMS in the Certain Cast Iron Articles industry, please detail your position in as much detail as possible.

Answer:

Qingdao Everbright claims that there is not a PMS in the Certain Cast Iron Articles industry of China. The main reasons are as follows:

- (1) Both Qingdao Everbright and Heshengda are private companies invested by natural persons. The Government of China ("GOC") does not intervene the daily operation of the two companies.**
- (2) Neither Qingdao Everbright nor Heshengda has the domestic sales of the goods subject to review during the POI. Thus, there is no state influence on price due to purchases by state-owned companies.**
- (3) The Certain Cast Iron Articles industry is an industry with high pollution, so the state has no reason to support such an industry.**



- (4) The prices of raw materials purchased by Heshengda are all market prices, which are at the same level with prices on the international market.**
- (5) The employment decisions of both Qingdao Everbright and Heshengda are made on their own and are not intervened by the GOC.**



SECTION E: Other questions

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.

1. Please indicate any other factors which are causing or may cause injury to UK industry in the like goods if the anti-dumping measures were revoked, 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.

Answer:

Not applicable.

2. Please describe how you would expect revocation of the measure to affect:
 - your exports of the goods subject to review to the UK; and
 - market price of the goods in the UK.

Where possible, please provide estimates for future years (e.g. projections or forecasts) to support your claims.

Answer:

Not applicable.



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 – Sales	✓
Section C – Fair comparison	✓
Section D – Costs and performance	✓
Section E – Other questions	✓
Section F – Declaration	✓

+Add additional rows as required.

Please list any appendices that you have referenced throughout and are attaching along with this questionnaire.

Appendix reference	Document title
Appendix A-1.2	Letter Authorising Representation.
Appendix A-3.1	A3 – Organisational Structure 【Confidential】
Appendix A-3.2	Internal Organisational Chart 【Confidential】
Appendix A-4.1	A4 – Owners and shareholders 【Confidential】
Appendix A-4.3.a	Articles of Associations 【Confidential】
Appendix A-4.3.b	Business Licences 【Confidential】
Appendix A-4.3.c	Proof of Registration of Qingdao Everbright 【Confidential】
Appendix A6.4	Financial Statements 【Confidential】
Appendix A6.5	Trial Balance 【Confidential】
Appendix A6.8	Chart of Accounts 【Confidential】
Appendix A-7.6	A7.2 – Other goods 【Confidential】
Appendix B-1.1	B1.1 – Upwards sales reconciliation 【Confidential】



Appendix B-4.1	B4.1 – Sales to the UK 【Confidential】
Appendix-B4.1.4	Export documents to UK customers 【Confidential】
Appendix-B5.1	Exchange Rates for Currency Conversion 【Confidential】
Appendix B6	B6 – Export sales to third countries 【Confidential】
Appendix D1.1	D1 – Turnover 【Including confidential Information】
Appendix D2.1	D2 – Income statement 【Confidential】
Appendix-D2.3	Income Tax Declaration and VAT Declaration 【Confidential】
Appendix D8.1	D8 – Purchases of like goods 【Confidential】
Appendix D9.1	D9 – Profitability 【Confidential】
Appendix D9.2	The Breakdown of Profitability 【Confidential】
Appendix D11.1	D11.1 – AS&G 【Confidential】