



Pre-Sampling Questionnaire (Producer)
Transition review of anti-dumping measures
Case TD0063: Ironing Boards originating in the
People's Republic of China

Period of Investigation:	01 July 2023 – 30 June 2024
Injury Period:	01 July 2020 – 30 June 2024
Deadline for response:	14 October 2024
Case Team Contact:	TD0063@traderemedies.gov.uk
Completed on behalf of:	Anonymous

When you have completed this form, indicate the **confidentiality** status of this document by placing an X in the relevant box below and in the header. We strongly recommend this questionnaire to be completed electronically.

☐ Confidential

☒ Non-confidential – will be made publicly available

Please note that you will have to provide **two copies of your response** – a **confidential** and a **non-confidential version**. Both copies must be returned to the TRA using the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **14 October 2024**.



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Instructions

The Trade Remedies Authority (TRA) will be carrying out a transition review of the EU trade remedy measure which will assess whether the dumping of ironing boards from the People's Republic of China (PRC) would be likely to continue or recur if the anti-dumping duty were no longer applied to those goods, and injury to the UK industry in the **like goods** would be likely to continue or recur if the anti-dumping duty were no longer applied to those goods.

Who should complete this form?

You should complete this form if you are a **UK producer** of the [like goods](#) (as defined on page 5) in this transition review.

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

We are seeking your cooperation as a **UK producer** of the **like goods** to inform our review of the existing anti-dumping measures imposed on imports of ironing boards originating in the PRC, and whether to vary (including extending the application of) or revoke the current measure.

If you are not a **UK producer**, please complete either relevant Pre-Sampling Questionnaire (PSQ) for importers or exporters. Alternatively, if you do not fit into any of these categories but have information that you wish to be considered during the investigation, you can complete the Other Interested Party and Contributor Registration form.

This PSQ allows us to collect basic information and data about your company. Together with other factors and information we may obtain from other sources, it will also allow us to conduct preliminary analyses of the likelihood of dumping and injury continuing or recurring if the measure were to be revoked. If a large number of UK producers complete this PSQ, we will use the information provided to decide which companies to sample for further investigation. If you are sampled, we will send you a more detailed questionnaire to complete.

If we do not receive sufficient information in this PSQ or the detailed questionnaire (if requested to complete), we may be unable to use your information in this transition review and will have to rely on the facts available to us.

Also, if you do not complete this pre-sampling questionnaire or the detailed questionnaire (if requested to complete), you could be found to be non-cooperative. For more details on how this may affect you, please consult our [operational guidance on non-cooperation](#).



Note about confidentiality

You will need to submit one confidential version **and** one non-confidential version of your PSQ by the due date, clearly marked either “Confidential” or “Non-confidential” in the header.

Your non-confidential version should be the same as your confidential submission, but with any confidential information redacted, including all personal contact information including names and signatures.

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

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

The non-confidential version of your submission will be placed on the public file, which is available on:

<https://www.trade-remedies.service.gov.uk/public/case/TD0063/>.

Deadline for response

A completed PSQ (confidential and non-confidential versions) must be submitted to the TRA no later than **14 October 2024**.

If you are unable to provide a completed submission by this date and you wish to request an extension, please contact TD0063@traderemedies.gov.uk. We may grant extensions to deadlines on a case-by-case basis with a commitment to ensuring fairness to all parties. Extensions will only be granted when reasonable justification has been provided, and for a maximum period of half the original completion period (e.g., a seven-day extension in a 14-day registration period).



The scope of this transition review

Goods subject to review

This transition review covers ironing boards originating in the PRC, described as:

Ironing boards, whether or not free-standing, with or without a steam soaking or heating top or blowing top, including sleeve boards, and essential parts thereof, i.e. the legs, the top and the iron rest.

These goods are currently classifiable within the UK's following commodity codes:

39 24 90 00 10	73 23 93 00 10	85 16 79 70 10
44 21 99 99 10	73 23 99 00 10	85 16 90 00 51

These commodity codes are only given for information. The goods are defined by the current description.

In this pre-sampling questionnaire (PSQ), these goods will be referred to as the **goods subject to review** (identified by the goods description above, regardless of the commodity code under which they are exported).

To note: if you disagree with the description of the **goods subject to review** within the scope of this transition review, you can comment on this in section [C2 – Scope](#).

Like goods

In this PSQ, the '**like goods**' are defined as goods that are produced in the UK or imported into the UK from a country other than the PRC, and which are like the '**goods subject to review**' in all respects, or, if there are no such goods, goods with characteristics closely resembling them.

This PSQ will ask for information about your company's production, imports and sales of the **like goods**.



Recalculation in transition reviews

Please note that the TRA does not intend to assess whether it is necessary to recalculate the anti-dumping amounts in this transition review unless registered parties to the case provide compelling evidence that it may be appropriate to recalculate. If this is the case, please provide the information as part of this submission in section [C6 – Anything else](#).

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

For more information, you may refer to the Notice of Initiation published at: <https://www.trade-remedies.service.gov.uk/public/case/TD0063/>.



Section A – Activities of your company and any associated parties

A1 – Your company's activities

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

- ☒ producer of the **like goods** in the UK
- ☐ producer of the **like goods** in the UK and also an importer of **like goods** or **goods subject to review**
- ☐ other (please give details below)

If you have selected 'other', please describe the role of your company with regards to the **goods subject to review** or **like goods**: If you have selected producer that imports, please detail the volume you produce compared to the volume you import.

A2 – Associated parties and operational links

Please give details of all associated parties involved with your company in the production and sales (export and / or domestic) of the **like goods** during the Period of Investigation (POI). The POI can be found on the title page of this document. Both natural persons (individuals) and legal persons (e.g. companies) are considered to be associated where they meet the definition of '**Related Persons**' in [regulation 128 of the Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#).

Examples of activities with associated parties could include production, domestic sales, export sales, and / or further processing of the **like goods** (i.e., companies owned by the same parent group).

	Company name	Company location (city, country)	Activities	Relationship (i.e., associated supplier, associated sales)
Associated party 1				



Associated party 2				
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+ Add additional rows as required

A3 – Your position in respect of this measure

Please describe whether you think the anti-dumping measure should be varied (including extended) or revoked and why:

We respectfully submit that the current anti-dumping measures should not only be extended but also varied to reflect the ongoing dumping practices by certain exporters from the People's Republic of China (PRC).

Our position is predicated on the continued existence of dumping of like goods by PRC exporters into the UK market at prices that are demonstrably below normal value. This has led to continued material injury to the UK industry, which remains vulnerable to price undercutting and suppression. While the imposition of anti-dumping duties has provided some relief, the lower rates applied to certain PRC exporters are insufficient to counteract the distortive impact of their imports.

We, therefore, advocate for a review and adjustment of the existing duty rates to more accurately reflect the margin of dumping identified for these exporters. In particular, exporters benefiting from lower duty rates continue to exhibit pricing behaviour indicative of dumping, which undermines the effectiveness of the measures and harms the UK industry. An increase in these specific duty rates would mitigate such adverse impacts and better serve the remedial objectives of the anti-dumping regime.

Further, within Section C6, we will provide evidence of this continued dumping by PRC exporters, which substantiates the need for maintaining and varying the anti-dumping measures. This evidence demonstrates the detrimental effect these imports have on the UK market and highlights the inadequacy of the lower duty rates in preventing such practices.

Moreover, we contend that revocation of the measures at this stage would likely result in a resurgence of the injurious dumping practices, which would reverse the progress made in protecting the domestic industry. The removal of these measures would likely lead to the closure of our UK manufacturing plant and the subsequent loss of 50-100 jobs, making it critical to ensure the continued protection of the UK market through an appropriate anti-dumping framework.

Section B – Production and sales

B1 – Financial period

Please specify what your most recent financial period is.

30/09/2023 to 04/10/2024



B2 – Production

Please fill in your company's production volume and capacity in the table below.

	Volume*	
	kg	units
Total production of your company during your most recent 12-month financial period	N/A*	N/A*
Total production of the like goods during your most recent 12-month financial period	Range 1,750,000- 2,000,000	Range 250,000- 310,000
Total production capacity of your company during your most recent 12-month financial period	N/A ¹	N/A*
Total production capacity of the like goods during your most recent 12-month financial period ²	Range 4,750,000- 5,100,000	Range 750,000- 900,000

* Note: volume by mass preferably, else by number of units

N/A¹ We manufacture a large variety of products with various production capacities it would take a great deal of time to calculate all of them and we don't feel it would add any value to the questionnaire.

Production capacity of like goods – weight is based on the average board weighing Range 5.5kg to 6.5kg (average in most recent 12-month financial period)



B3 – Sales volume and value

Please fill in your company's production volume and capacity in the table below.

	Volume*		Value in GBP (£)
	Kg	units	
Total sales of your company in your most recent 12-month financial period	N/A	N/A	Range £40,000,000- £42,000,000
UK sales of the like goods produced in the UK during your most recent 12-month financial period	Range 1,500,000- 2,000,000 ¹	Range 275,000- 305,000	Range £5,750,000- £6,250,000

* Note: volume by mass preferably, else by number of units

1 – Volume in kg based on the average board weight of production for the most recent 12-month financial period, being in the range 5.5kg to 6.5kg

Section C – Additional information

C1 – Market prices in the PRC domestic and export market, and price comparison to the UK market

One of the factors the TRA considers in our analyses is a comparison between the UK domestic prices of the **like goods**, the prices of the **like goods** sold domestically in the PRC, and prices of the **goods subject to review** (exported from the PRC to the UK). To conduct this comparison, we need to understand the PRC market prices of the **like goods** and the **goods subject to review**.



For our analyses, are you able to provide examples of the market price of the **goods subject to review** exported from the PRC to the UK, and the **like goods** produced and sold within the PRC – and are you able to support this information with any sources that you consider to be relevant to this investigation?

In addressing the comparison between the market price of goods exported from the PRC to the UK and like goods produced and sold domestically within the PRC, we wish to highlight several key factors and propose an alternative methodology for addressing the issue of distortions in PRC domestic pricing.

Use of a Surrogate or Reference Country for Domestic Price Comparison

Due to significant distortions in China's internal market, as recognised in the EU's document on significant distortions in China's economy, PRC domestic prices cannot be considered reliable or suitable for direct comparison in trade defence cases. Given the extensive state intervention and the lack of market-based pricing in China, we suggest that, in line with the EU's approach, the use of a third-country surrogate or reference country should be considered as an alternative to internal Chinese prices for the purposes of this investigation. This methodology would allow for the use of pricing data from a comparable market economy (a reference country) that operates under market principles, enabling a more accurate and fair comparison of the prices of like goods.

Market Price Evidence for PRC Export Prices

For export prices from the PRC to the UK, we provide the following publicly available and calculated data, which we believe offers an accurate reflection of the likely export prices of like goods:

- **Annex C1.1:** A publicly available listing from Alibaba.com for an ironing board produced in the PRC, priced at \$8.50 per unit, with the PRC as the country of origin. While this represents a starting price, it is typical in negotiations for the final export price to be lower.
- **Annex C1.2:** A listing from a UK-based retailer for a comparable product, explicitly stating the country of origin (COO) as the PRC. This listing provides further evidence of PRC-origin products in the UK market.
- **Annex C1.3:** Evidence from another retailer selling an ironing board with COO PRC, further confirming the presence of PRC-origin products in the UK market.
- **Annex C1.4:** Calculation of the likely FOB costs for the boards in Annex C1.2 & C1.3, based on market knowledge, which supports our understanding of typical export pricing dynamics for these goods.

Conclusion

Given the distortions in the PRC's domestic pricing mechanisms, we recommend the use of a third-country surrogate or reference country as an appropriate alternative for comparing the price of like goods. This is in line with established trade defence methodologies and ensures a fair and market-based approach to price comparison.

For PRC export prices, we rely on publicly available data, such as the Alibaba.com listing, and our own market knowledge to provide a fair and accurate estimation of the likely price at which ironing boards are available for export from China.



Compared to the UK market prices of the **like goods**, please provide any details (and where possible, any sources) that can explain differences between UK market prices and overseas export market prices? This could include, but not be limited to, product quality or production costs.

In addressing the differences between the UK market prices of like goods and the prices of goods exported from the People's Republic of China (PRC), we note that there is little discernible difference in product quality. Both UK-sold goods and PRC exports are comparable in terms of materials and functionality, particularly in the case of ironing boards.

Despite the fact that labour costs in the PRC are significantly lower than in the UK, this cost advantage is largely offset by the manual production methods employed in the PRC. The labour-intensive nature of these methods diminishes the overall cost savings that might otherwise arise from lower wage rates in the PRC.

The principal factor contributing to the significantly lower prices of PRC exports, compared to UK market prices, is the high level of state intervention in the Chinese economy.

Therefore, while product quality and labour costs contribute to pricing dynamics, the primary reason for the disparity between UK market prices and PRC export prices lies in the substantial state involvement in the PRC's economy, which results in unfair price advantages for PRC exporters.

C2 – Scope

Please review the scope of this transition review on [page 4](#). Do you consider the description of the **goods subject to review** to be suitable compared to the **like goods** produced by the UK industry?

Yes

Are there goods you feel should be included within the scope, or excluded from the current scope?

No

C3 – Product Control Numbers

The TRA uses product control numbers (PCNs) to define and distinguish the different types of products that fall under the goods description above.

PCNs, which come in the form of an **alphanumeric code**, help to create a categorisation system so that comparisons can be made between goods produced in the domestic UK market and those produced in foreign markets.



We have created a draft PCN table which is set out in [Annex 1](#) at the end of this document.

Please review the draft PCN structure for this investigation and include any comments on the PCN structure in the box provided below:

We would suggest the category iron rest needs a character 4 to cover plastic rests (whether or not removeable).

C4 – Other interested parties

If you believe there are other interested parties that should receive a questionnaire, please provide their organisation name and website details below. This could include other producers, importers, exporters, or any other party who may have a contribution to make to the investigation relating to ironing boards.

Organisation name	Website

C5 – Economic Interest Test

While conducting a transition review, to make a recommendation to vary (including extending) the anti-dumping measure, we must conduct the Economic Interest Test (EIT). The purpose of the EIT is to determine whether the implementation of the proposed trade remedy measure is in the wider economic interest of the UK.

In order to obtain a complete picture of the UK market, could you please provide us with details of your UK suppliers (upstream companies providing inputs) and UK customers (downstream companies buying your **like goods**).

We would like to use any contact details you provide to get in touch with these companies, although there is no obligation on you to provide this information.



	Company name	Location (city, country)	Contact information (email / telephone)	Relationship
1	<i>Redacted Commercially sensitive</i>	Birmingham, UK	<i>Redacted Commercially sensitive</i>	Supplier
2	<i>Redacted Commercially sensitive</i>	Accrington, UK	<i>Redacted Commercially sensitive</i>	Supplier
3	<i>Redacted Commercially sensitive</i>	Burnley, UK	<i>Redacted Commercially sensitive</i>	Supplier
4	<i>Redacted Commercially sensitive</i>	Stevenage, UK	<i>Redacted Commercially sensitive</i>	Supplier
	<i>Redacted Commercially sensitive</i>	Manchester, UK		Supplier

C6 – Anything else



Please use the box below to provide information about anything else you consider relevant to this transition review (e.g., compelling evidence that it may be appropriate to recalculate the anti-dumping amounts; comments around a particular market situation (PMS) in the PRC).

We believe it is crucial to emphasise that PRC exporters continue to engage in dumping practices in the UK market, despite the imposition of anti-dumping duties. This ongoing dumping is evidenced by the Alibaba listing we have provided in Annex C1.1, which features a product from Guangdong Wireking Household Supplies Co. Ltd available for export at a price that strongly suggests dumping.

This is particularly concerning given that Guangdong Wireking Household Supplies Co. Ltd is currently subject to lower anti-dumping duty levels. The lower duty rate applied to them appears insufficient to curb dumping activities, as they are still able to offer products at significantly lower prices, undermining fair competition in the UK market. We therefore urge a review of these duty levels to ensure that they are recalibrated to reflect the actual dumping practices and to protect the UK industry from unfair pricing.

Moreover, Guangdong Wireking Household Supplies Co. Ltd has publicly claimed to offer their products duty-free to both the EU and USA markets, which is alarming given their ability to export under such terms. While they do not make this claim in reference to the UK market, this is likely due to the relative size of the UK market compared to the EU and USA. However, we are concerned that Guangdong Wireking Household Supplies Co. Ltd may extend similar offers to UK importers, potentially circumventing existing duties and undermining the effectiveness of current trade measures.

In light of this, we strongly recommend that the anti-dumping amounts be recalculated, particularly for exporters such as Guangdong Wireking Household Supplies Co. Ltd, to better reflect the market realities and prevent further harm to UK industry. We believe this review is essential to maintaining a fair and competitive market environment in the UK.

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

If you have any questions or require further guidance, please contact the case team via the email provided.



Annex 1 – PCN table

Category	Character	Description
Ironing board type	S	Sleeve board
	T	Tabletop board
	N	Standard ironing board (other than 'S', 'T' and 'L')
	L	Pro ironing board (ironing board with steam soaking and/or heating and blowing top)
Top length	1	less than 115 cm (< 115)
	2	from 115 cm to 125 cm ($\geq 115 \leq 125$)
	3	more than 125 cm (> 125)
Top construction/material	M	Mesh steel
	S	Solid steel
	O	Other
Legs construction	1	Standard ironing board without legs or tabletop board or sleeve board
	2	Standard or pro ironing board with T legs
	3	Standard or pro ironing board with 3 legs
	4	Standard or pro ironing board with 4 legs
	5	Standard or pro ironing board with U legs
Cover and pad	S	Standard cotton and/or polyester cover without pad or with foam pad
	M	Metalized cover with foam or felt pad or cover with felt pad
Iron rest	0	Not present
	1	Steel wire
	2	Pressed steel or other solid iron rest (whether or not removable, with or without hanger rack or cord minder etc.)
	3	Combination iron / steam generator rest
Accessories	0	No accessories
	1	With accessories (e.g. sleeve board, linen rack and socket with extension with or without cord minder)

Example of the PCN:

A standard ironing board of 97 x 34cm made from mesh steel with T legs and covered by fabric with an iron rest with no accessories will have the following PCN:
N1M2S20