



## Pre-Sampling Questionnaire (Exporter) Transition Review

### Case TD0029: Certain Cast Iron Articles originating in the People's Republic of China

Period of Investigation:	1 October 2021 – 30 September 2022
Injury Period:	1 October 2018 – 30 September 2022
Deadline for response:	8 December 2022
Case Team Contact:	TD0029@traderemedies.gov.uk
Completed on behalf of:	<b>Qingdao Everbright Machinery Co., Ltd.</b>

When you have completed this form, indicate the **confidentiality** status of this document by placing an X in the relevant box below and in the header. We strongly recommend this questionnaire to be completed on the computer, so this step is easy to complete.

- Confidential  
 Non-Confidential – will be made publicly available

Please note that you will have to provide **two copies of your response** – a **Confidential** and a **Non-Confidential version**. Both copies must be returned to the TRA using the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)) by **8 December 2022**.



## Table of Contents

<b>The scope of this review .....</b>	<b>3</b>
<b>Instructions .....</b>	<b>5</b>
<b>Who should complete this form.....</b>	<b>5</b>
<b>Why you are being asked to complete this pre-sampling questionnaire .....</b>	<b>5</b>
<b>Deadline for response .....</b>	<b>6</b>
<b>Note about confidentiality .....</b>	<b>6</b>
<b>Section A – Activities of your company and any associated parties .....</b>	<b>7</b>
<b>A1 – Your company’s activities .....</b>	<b>7</b>
<b>A2 – Associated parties and operational links .....</b>	<b>8</b>
<b>Section B – Production and sales volumes .....</b>	<b>9</b>
<b>B1 – Production.....</b>	<b>9</b>
<b>B2 – Sales volume and value .....</b>	<b>9</b>
<b>B3 – Commodity codes .....</b>	<b>10</b>
<b>Section C – Individual anti-dumping .....</b>	<b>11</b>
<b>Section D – Additional information .....</b>	<b>12</b>
<b>D1 – Other interested parties .....</b>	<b>12</b>
<b>D2 – Particular Market Situation .....</b>	<b>12</b>
<b>D3 – Scope.....</b>	<b>13</b>
<b>D4 – Product Control Numbers.....</b>	<b>13</b>
<b>D5 – Economic Interest Test .....</b>	<b>17</b>
<b>D6 – Anything else .....</b>	<b>18</b>



## The scope of this review

### Goods subject to review

This review covers **Certain Cast Iron Articles** exported from the **People's Republic of China** 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 sub-surface 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 commodity codes;

*73 25 10 00 31*

*73 25 99 10 60*

These commodity codes are only given for information.

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



## Like goods

In addition to seeking information about your company's export sales to the UK of the goods **subject to review**, this pre-sampling 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 goods subject to review or like goods.**

For more information about this case, you may refer to the Notice of Initiation published at: [www.trade-remedies.service.gov.uk/public/cases](http://www.trade-remedies.service.gov.uk/public/cases)



## Instructions

The Trade Remedies Authority (TRA) will be carrying out a transition review of the UK trade remedy measure which will consider whether:

Certain cast iron goods from The People's Republic of China are being exported to the UK at prices less than their normal value and that this dumping (export price at less than normal value) is likely to cause injury to the UK industry for these goods if the anti-dumping amount no longer applied.

### Who should complete this form

You should complete this form if you are an overseas exporter of the goods subject to review.

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

We are seeking your cooperation as an overseas exporter of the goods subject to review to inform our review of whether the current anti-dumping measure should be maintained, varied or discontinued. If you are not an overseas exporter, please complete either the relevant Pre-Sampling Questionnaire or the Other Interested Party and Contributor Registration Form.

This pre-sampling questionnaire allows us to collect basic information and data about your company. If a large number of overseas exporters of the goods subject to review from The People's Republic of China complete this pre-sampling questionnaire, we will use the information each one provides to help us decide which companies we want to sample for further investigation. If you are sampled, we will send you a more detailed questionnaire to complete.

By submitting a completed detailed questionnaire response, you might become eligible for an individual anti-dumping if we are recommending that measures are continued following this review. Please refer to [Section C](#) for more information on individual **anti-dumping** amounts.

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



## Deadline for response

A completed pre-sampling questionnaire must be submitted to the TRA by no later than **8 December 2022**. If you are unable to provide a completed submission by the given due date and you wish to request an extension, please contact **David Sibley, TD0029@traderemedies.gov.uk** and see the TRA's guidance on extension requests for further information.

## Note about confidentiality

You will need to submit one confidential version and one non-confidential version of your pre-sampling questionnaire by the due date.

Please ensure that each page of information you provide is clearly marked either "Confidential" or "Non-Confidential" in the header.

It is your responsibility to ensure that the non-confidential version does not contain any confidential information, which includes personal contact information, names and signatures.

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

All information provided to the TRA in confidence will be treated accordingly and only used for this investigation (except in limited circumstance as permitted by regulation 46 of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019) and will be stored in protected systems. The non-confidential version of your submission will be placed on the public file, which is available on [www.trade-remedies.service.gov.uk/public/cases](http://www.trade-remedies.service.gov.uk/public/cases)



## Section A – Activities of your company and any associated parties

### A1 – Your company’s activities

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

- overseas exporter of the 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 the like goods:

**Not applicable.**

Please describe your interest in this review:

**Qingdao Everbright Machinery Co., Ltd. (“Everbright”) is a Chinese exporter of the goods concerned. During the period of investigation, Everbright has exported the goods concerned manufactured by [redacted – commercially sensitive information] to UK. Whether the current anti-dumping measure will be maintained, varied or discontinued will have an influence on the sales of Everbright.**



**A2 – Associated parties and operational links**

Please give details of all associated parties involved with the company in the production and sales (export and/or domestic) of the goods subject to review or like goods during the POI. Both natural persons (individuals) and legal persons (e.g. companies) are considered to be associated where they meet the definition of ‘Related Persons’ in [regulation 128 of the Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#).

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

	<b>Company name</b>	<b>Company location (city, country)</b>	<b>Activities</b>	<b>Relationship</b>
You company	<b>Qingdao Everbright Machinery Co., Ltd.</b>	<b>Qingdao City, Shandong Province, China P.R.</b>	<b>Sales (export) of the goods subject to review</b>	<b>/</b>
Associated Party 1	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
Associated Party 2	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>

+ Add additional rows as required



## Section B – Production and sales volumes

### B1 – Production

Please fill in your company’s total production volume and capacity for the goods subject to review and like goods in the table below.

POI: 1 October 2021 – 30 September 2022	Volume Kgs
Overall production of the goods subject to review and like goods during the POI	0
Total production capacity of the goods subject to review and like goods during the POI	0

### B2 – Sales volume and value

Please provide the total sales volumes and sales price values in the table below.

POI: 1 October 2021 – 30 September 2022	Volume Kgs	Value CNY
Total export sales of the <b>goods subject to review</b> to the UK during the POI <b>manufactured</b> by your company	0	0
Total export sales of the <b>goods subject to review</b> to the UK during the POI <b>not manufactured</b> by your company	[commercially sensitive data: non-confidential range: 500,000-600,000]	[commercially sensitive data: non-confidential range: 6,500,000-8,000,000]
Total domestic sales of like goods during the POI <b>manufactured</b> by your company	0	0
Total domestic sales of like goods during the POI <b>not manufactured</b> by your company	0	0



### **B3 – Commodity codes**

Please provide details of the commodity code(s) you export the **goods subject to review** to the UK under in the box below:

7325 99 10 60



## Section C – Individual anti-dumping

If the TRA decides to sample overseas exporters, and you are **not** selected for this sample, you might become eligible for an individual anti-dumping amount if you complete a detailed questionnaire. Please indicate whether you would complete this questionnaire below

- Yes  
 - No

If you do **not** choose to complete a detailed questionnaire, you will not be eligible for an individual anti-dumping amount. Your anti-dumping amount will be determined based on the amounts imposed on the overseas exporters in the sample.

### Please note:

If we recommend that a trade remedy measure continues following this review, and you have requested an individual anti-dumping please note that you will be required to supply the necessary information within the given timeframe for us to calculate this for you.

The TRA must accept an overseas exporter's request for an individual anti-dumping amount and calculate an individual amount, providing that:

- the information required is complete and submitted on time; and
- the number of requests for individual calculations does not unduly burden the review and risk delaying its conclusion.



## Section D – Additional information

### D1 – Other interested parties

If you believe there are other interested parties that should receive a questionnaire, please provide their organisation name and website details below.

None.

Organisation name	Website

### D2 – Particular Market Situation

If you have any concerns or information about the possible existence of a particular market situation in the exporting country or territory, please provide details in the box below. This can include examples such as:

- Prices are artificially low
- There is significant barter trade (e.g. goods exchanged for other goods)
- Prices reflect non-commercial factors; or
- Anything else

**There is no particular market situation existing in the People’s Republic of China.**



### D3 – Scope

Do you agree with the scope of the investigation as outlined on page 3?

Yes

No

If you have answered no to the above question, please can you explain why?

**Not applicable.**

### D4 – Product Control Numbers

The TRA uses Product Control Numbers (PCNs) to define and distinguish the different types of products that fall under the goods description above.

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

We have created a draft PCN table and enclose this here for you now.

Category	Field Format	Sub-category Format	Explanation
<b>1. Product Type</b>	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)
<b>2. Loading Class</b>	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
<b>3. Raw Materials</b>			
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
<b>4. Shape and Frame</b>			
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	<b>Specify the dimensions of the clear opening area in dm(1dm =100mm) :</b>	
			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
<b>5. Special features</b>			
5.1 Hinges	1, text	<b>Specify whether covers are equipped with hinges for facilitating lifting operations :</b>	
		H	equipped with hinges
		U	not equipped with hinges
5.2. Securing feature or locking accessory according to EN124	1, text	<b>Specify whether there is a securing feature or locking accessory:</b>	



		S	securing feature or locking accessory or both
		F	no securing feature or locking accessory
<b>6. Standard</b>	1, numeric	<b>Indicate whether the casting complies with any standard :</b>	
		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:

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 have the following PCN code

**SDDNNC07rd12IS1**

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

Please review the draft PCN structure for this review shown in the table above. Please include any comments on the PCN structure in the box provided.



Everbright has no comments on the PCN structure.

**D5 – Economic Interest Test**

It is a requirement of the review to conduct an Economic Interest Test (EIT). The aim of the EIT is to determine whether the implementation of the proposed trade remedy measure is in the wider economic interest of the UK. In order to obtain a complete picture of the UK market, could you please help by providing us with details of your UK suppliers (upstream companies providing inputs) and UK customers (downstream companies buying your like goods). Please confirm in the final column if we are able to contact these companies.

	Company name	Company location (city, country)	Company Contact Information (email/telephone)	Relationship	Can we contact Y/N
1	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]
2					
3					
4					



## D6 – Anything else

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

None.

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