



Registration Form

Interested Parties and Contributors

Transition review of anti-dumping measures

Case TD0035: Certain pneumatic tyres used for buses or lorries exported from the People's Republic of China

This form is for other Interested Parties and Contributors, including foreign governments, trades or business associations and others wanting to participate in the review. Please see party type below.

This form is not to be completed by UK Producers, Importers or Overseas Exporters of the goods subject to review – please see the relevant Registration and Pre-Sampling Questionnaire.

| | |
|---------------------------------|--|
| Period of Investigation: | 1 January 2022 – 31 December 2022 |
| Injury Period: | 1 January 2019 – 31 December 2022 |
| Deadline for response: | 18 May 2023 |
| Case Team Contact: | TD0035@traderemedies.gov.uk |
| Completed on behalf of: | China Rubber Industry Association (CRIA) |

| | |
|-----------------------------|---|
| Party type (select): | <input type="checkbox"/> Contributor <input type="checkbox"/> Government of relevant foreign country or territory (<i>Interested Party</i>) <input checked="" type="checkbox"/> Trade or business association of overseas producers, overseas exporters or importers of the goods subject to review (<i>Interested Party</i>) <input type="checkbox"/> Trade or business association of UK producers of like goods or directly competitive goods (<i>Interested Party</i>) <input type="checkbox"/> Overseas producer* of the goods subject to review (<i>Interested Party</i>) <i>*who does not export. If you are an overseas producer who exports, please complete the exporter Pre-Sampling Questionnaire.</i> |
|-----------------------------|---|



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 document 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) by **18 May 2023**.



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The scope of this review

Goods subject to review

This review covers certain pneumatic tyres, new or retreaded, of rubber, of a kind used for buses or lorries, with a load index exceeding 121, exported from the People's Republic of China (PRC).

These pneumatic tyres are currently classifiable within the following commodity codes:

- 4011 20 90 00;
- 4012 12 00 10.

These commodity codes are only given for information.

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

Like goods

Any reference to **'like goods'** in this document refers to goods produced in the UK or imported to the UK from a country other than the People's Republic of China 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/case/TD0035/.



Instructions

Who should complete this form?

You should complete this form if you are one of the party types listed at the beginning of this document.

If you are a UK producer of the like goods, importer or overseas exporter of the subject to review, please complete the relevant Pre-Sampling Questionnaire.

Note about confidentiality

You will need to submit one confidential version and one non-confidential version of this document.

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 document.

All information provided to the Trade Remedies Authority (TRA) in confidence will be treated accordingly and only used for this investigation (except in limited circumstances 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/case/TD0035/.



Section A – Your organisation’s interest in the case

To register your organisation’s interest in this review, please complete the text boxes below.

Please describe your role with regards to the like goods and/or goods subject to review:

CRIA did not directly involve in producing or trading the goods subject to review or the like goods, but CRIA’s members produced and exported the above goods under investigation to the UK. Most of the producers and exporters of the goods subject to review during the period of investigation and injury period are CRIA’s members.

Please describe your interest in this review:

Some members of CRIA are involved in exporting the goods subject to review to the UK and thus CRIA raises concerns about this investigation. Therefore, being as the industry association of the Chinese exporters of the goods under review, we represent the interests of the Chinese industry in this case.



Section B – Additional information

B1 – Other interested parties

If you believe there are producers, overseas exporters, importers and other interested parties that should receive this document, please provide their organisation name and website details below.

| Organisation name | Website |
|-------------------|---------|
| N/A | N/A |
| N/A | N/A |
| N/A | N/A |
| N/A | N/A |

B2 – 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

CRIA raises particular concern about the compatibility of the anti-dumping measures, previously imposed on the imports of the goods under investigation by the European Union (“EU”) and carried over by the United Kingdom (“UK”) after the UK ceased to be a member of the EU, with the WTO agreements and in particular the Anti-dumping Agreement, in the absence of a proper new investigation conducted in line with the latter agreement beforehand. It should also be noted that the antidumping measures, together with the anti-subsidy measures imposed by the EU Commission were annulled by the EU General Court in May 2022. Consequently, the legality of the present review investigation of the said measures is also questionable.

CRIA also submits that there is no positive evidence indicating the existence of a particular market situation in the Chinese domestic market as far as the goods subject to review are concerned. Therefore, the investigating authority shall follow the general rules to determine the normal value of the like goods, i.e., based on the domestic sales prices and cost of Chinese exporting producers.



CRIA reserves the right to present its views on the absence of injurious status of UK producers of the like goods, and no likelihood of recurrence of dumping and injury if the existing anti-dumping measures are lapsed, once more information is available to it.

In any event, CRIA strongly believes that any extension of the existing anti-dumping measures will not fit in the economic interests of the UK, nor its public interests, given the current economic recovery need from the supply chain disruption caused by the global pandemic.

B3 - Scope

Do you agree with the scope of the investigation as outlined on page 4?

Yes

No

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

CRIA firmly believes that new tyres and retreaded tyres are two different products and should not be regarded as one product subject to one antidumping or anti-subsidy investigation and should not be deemed as "like products". Any goods subject to review which was not produced by UK domestic industry or, although they are produced by UK domestic industry, the production thereof cannot meet the needs of UK market, should be excluded from the scope of the review.

CRIA reserves the right to present its views on the scope of the investigation.

B4 – 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 any known UK suppliers (upstream companies providing inputs) and UK customers



(downstream companies buying the 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) | Upstream or Downstream | Can we contact Y/N |
|---|--------------|----------------------------------|--|------------------------|--------------------|
| 1 | TMA Europe | Essex ENGLAND | [Name: Confidential Information] [Tel: Confidential Information] [Mob: Confidential Information] [E-mail: Confidential Information] | Downstream | Y |
| 2 | N/A | N/A | N/A | N/A | N/A |
| 3 | N/A | N/A | N/A | N/A | N/A |
| 4 | N/A | N/A | N/A | N/A | N/A |

B5 – 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 document 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



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Authority

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Confidential

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information, names, and signatures. Please return both versions to the TRA using the Trade Remedies Service (trade-remedies.service.gov.uk)