



UK Producer Pre-Sampling Questionnaire

Case TD0057: Transition review of anti-dumping measures on Aluminium Foil in Rolls Originating in the People's Republic of China

Period of Investigation:	1 January 2023 – 31 December 2023
Injury Period:	1 January 2020 – 31 December 2023
Deadline for response:	4 June 2024
Case team contact:	TD0057@traderemedies.gov.uk
Completed on behalf of:	CEDO LIMITED

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 the deadline for response indicated above.



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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 consider whether the dumping of Aluminium Foil in Rolls (AFR) originating in the People's Republic of China (and those consigned from Thailand) 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 you are 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 against Aluminium Foil in Rolls Originating in the People's Republic of China, and whether to vary (including extending the application of) or revoke the current measures.

If you are not a **UK producer**, please complete the 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. 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 the review and will have to rely on facts available to us.



Note about confidentiality

You will need to submit one confidential version **and** one non-confidential version of your PSQ by the **deadline**, 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 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). All information will be securely stored.

The non-confidential version of your submission will be placed on the public file, available at: <https://www.trade-remedies.service.gov.uk/public/case/TD0057/>

Deadline for response

If you are unable to provide a completed submission by the **deadline** and you wish to request an extension, please contact the case team. Extensions will only be granted if reasonable justification is provided, and for a maximum period of half the original completion period (i.e., five days extension in a 10-day registration period). The TRA’s guidance on extension requests can be found [here](#).



The scope of this transition review

Goods subject to review

This transition review covers Aluminium Foil in Rolls Originating in the People's Republic of China (and those consigned from Thailand) (PRC), described as:

Aluminium foil of a thickness of 0,007 mm or more but less than 0,021 mm, not backed, not further worked than rolled but whether or not embossed, in rolls of a weight not exceeding 10 kg.

These **goods** are currently classifiable within the UK's following commodity code(s):

76 07 11 11 11	76 07 19 10 11
76 07 11 11 19	76 07 19 10 19

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

In this 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: should 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**' is 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 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 [C5 – 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 on the public file.

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.

- producer of the **like goods** in the UK
- producer of the **like goods** in the UK but 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**:



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 like goods during the last financial year. 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	<i>Cedo sp. z o.o.</i>	Ul. Nowowiejska 32; 55-080 Kąty Wrocławskie, Poland	<i>[Confidential: Business confidential information pertaining to the scope of activities of Cedo so. z.o.o]</i>	<i>[Confidential: Business confidential information pertaining to the scope of activities of Cedo so. z.o.o]</i>
Associated party 2				

+ Add additional rows as required

A3 – Your position in respect of this transition review



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

CEDO LIMITED strongly supports extension of the anti-dumping measures on aluminium foil in rolls from the PRC for another five years in view of the injurious dumping practices of the PRC exporting-producers of aluminium foil.

According to the information available to our company, export price of aluminium foil from the PRC to third countries is significantly lower than the price in these countries, as well as the undistorted domestic price within the PRC. Therefore, should the anti-dumping measures be allowed to lapse, imports from the PRC would come to the UK at dumped prices. In addition, should measures be repealed in the UK, the current import level of aluminium foil in rolls from the PRC will considerably increase to the detriment of the UK production in view of the existence of significant spare capacities of aluminium foil in rolls in the PRC and trade defence measures maintained by other third countries against imports of aluminium foil from the PRC.



Section B – Production, sales and imports

Please note: if registered parties to the case provide compelling evidence that it may be appropriate to recalculate, our full questionnaires may require detailed transaction by transaction listings of all sales of the like goods during the POI. Further to this, we may also require information related to the costs to produce the like goods.

Please can you confirm whether you will be able to provide this information to the level of detail required? If you answer no, we may not include you in our sample and you may not be sent a full questionnaire.

- Yes
 No

B1 – Production

Please fill in your company’s total UK production volume and capacity for the like goods in your last financial year, in the table below.

	Volume (Metric tonnes)
Overall production of the like goods	0
Overall production of other goods that use the same raw materials	0
Overall production of other goods that use the same production processes	[1,000-3,000]
Total production capacity of the like goods	0

B2 – Sales volume and value

Please provide your UK sales data for the like goods produced in the UK by your company during your last financial year.

	Volume (Metric tonnes)	Value in GBP (£)
UK sales of the like goods produced in the UK	0	0
Export sales of the like goods produced in the UK	0	0



B3 – Imports and Sales

If your company has imported the goods subject to review or the like goods from the PRC or any other country, and sold them in the UK during the POI, provide your sales data for these for your last financial year:

	Volume (Metric tonnes)	Value in GBP (£)
Imports of the goods subject to review from the PRC	0	0
Imports of the like goods from countries <u>other than the PRC</u>	[2,000-5,000]	[15,000,000-25,000,000]
UK sales of the goods subject to review, imported from the PRC	0	0
UK sales of the like goods, imported from countries other than the PRC	[2,000-5,000]	[15,000,000-25,000,000]

B4 – Raw Materials

Please give a breakdown of the raw materials you use to produce the goods subject to review or the like goods, during your last financial year:

Raw material description	Volume (Metric tonnes)	Value in GBP (£)
N/A	N/A	N/A



Section C – Additional information

C1 – Market prices in the PRC domestic & exporters 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?

CEDO LIMITED has access to a paid market intelligence database - [*Confidential: Information subject to copyrights*] - indicating the price of export of aluminium foil from the PRC to the UK under the tariff code 7607 11 10 referring to “aluminium foil (not backed), rolled (but not further worked, of a thickness not exceeding 0.021 mm (excluding stamping foils of heading 3212, and foil made up as Christmas tree decorating material)”. Based on the data obtained from this database, FOB export price from the PRC to the UK was of [*Confidential: Information subject to copyrights*] USD/tonne in the period from October 2022 to September 2023.

With regard to the price of aluminium foil in rolls produced and sold within the PRC, CEDO LIMITED considers that these prices reflect non-commercial factors in view of the existence of a particular market situation (PMS) affecting cost of several inputs of aluminium foil in rolls and the price of the final product. For instance, the PRC maintains several export restrictions, such as export taxes on unwrought aluminium, which have the effect of artificially increasing the domestic supply of these products and lowering prices. In addition, energy in the PRC is subject to price-setting or guided by local governments. These distorted input costs mean that there is a lower level of competitive pricing in the PRC than the UK thus resulting in lower domestic prices of aluminium foil in rolls. Therefore, this PMS should be taken into account in order to ensure a proper comparison between the normal value and export price in the PRC.

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.



Most common type of the like good sold in the UK market is aluminium foil in rolls of a thickness of 0,014 mm and more, while the demand in overseas export market is also focused on thinner aluminum foil in rolls of a thickness of 0,010 mm.

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 those 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 – 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 this investigation.

Organisation name	Website
Wrapex Prowrap Limited	https://www.wrapex.com/

C4 – 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	Company location (city, country)	Company contact information (email/telephone)	Relationship
1	<i>[Confidential: Business confidential information pertaining to the company suppliers]</i>	Nottingham, UK		
2	<i>[Confidential: Business confidential information pertaining to the company suppliers]</i>	Wigan, UK		
	<i>[Confidential: Business]</i>	Weston super Mare, UK		



3	<i>confidential information pertaining to the company suppliers]</i>			
4	<i>[Confidential: Business confidential information pertaining to the company suppliers]</i>	Northampton, UK		

C5 – 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 in the PRC):

CEDO LIMITED is a long standing producer of various household products. As part of its business development strategy, the company recently decided to *[Confidential: Business confidential information pertaining to the strategic decisions of the company]*. The decision to *[Confidential: Business confidential information pertaining to the strategic decisions of the company]* accounted for the existence of anti-dumping measures on imports from the PRC, which removed unfair trade practices from the UK market and created suitable conditions for *[Confidential: Business confidential information pertaining to the strategic decisions of the company]*. Extension of the anti-dumping measures is therefore vital for the future *[Confidential: Business confidential information pertaining to the strategic decisions of the company]* since the removal of the anti-dumping measures would result in imports from the PRC at unfair prices and damage to the UK producers.

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 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).

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