



## Pre-Sampling Questionnaire (Importer) 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:	EJ UK Fabrication & Access Solutions 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 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

The scope of this review .....	3
Instructions .....	5
Who should complete this form .....	5
Why you are being asked to complete this pre-sampling questionnaire .....	5
Deadline for response.....	5
Note about confidentiality .....	5
Section A – Activities of your company and any associated parties .....	7
A1 – Your company’s activities .....	7
A2 – Associated parties and operational links .....	8
Section B – Details of companies you import from .....	9
Section C – Sales, imports and domestic purchases.....	10
C1 – Total company revenue.....	10
C2 – Your imports of the goods subject to review .....	10
C3 – Like goods purchased from a UK producer .....	11
Section D – Additional information.....	12
<b>D1 – Other interested parties</b> .....	12
<b>D2 – Particular Market Situation</b> .....	12
<b>D3 – Scope</b> .....	13
D4 – Product Control Numbers.....	13
<b>D5 – Economic Interest Test</b> .....	17
<b>D6 – Anything else</b> .....	18



## 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 imported.



## Like goods

This pre-sampling questionnaire asks for information about your company's imports and sales of goods which are **like** the goods subject to review. Any reference to 'like goods' in this pre-sampling questionnaire 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/cases](http://www.trade-remedies.service.gov.uk/public/cases)



## Instructions

### Who should complete this form

You should complete this form if you are a **UK importer** of the goods subject to review.

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

We are seeking your cooperation as a UK importer 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 a UK importer of the goods subject to review, please complete either the relevant Pre-sampling Questionnaire or the other Interested Party and Contributor Registration Form if you have information which you wish to be considered during the investigation.

This pre-sampling questionnaire allows us to collect basic information and data about your company. If a large number of UK importers 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.

### 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**, at **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 the section above on 'the scope of this review'.

importer of the goods subject to review in the UK

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:

Click or tap here to enter text.
Click or tap here to enter text.

Please describe your interest in this review:

### 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>
Associated Party 1	<i>European Drainage Systems Holdings Limited</i>	Nuneaton, Warwickshire, United Kingdom	Non trading holding company	Parent company to EJ UK FAS Limited
Associated Party 2	<i>EJ UK Fabrication &amp; Access Solutions Holdings Limited</i>	Nuneaton, Warwickshire, United Kingdom	Non trading holding company	Parent company to European Drainage Systems Holdings Limited
Associated Party 3	EJ EMEA	Saint Crépin Ibouvillers - Méru Cedex, France	Manufacturer and distributor.	Parent company to EJ UK Fabrication & Access Solutions Holdings Limited
Associated Party 4	<i>EJ America</i>	East Jordan MI USA.	Manufacturer and distributor.	Parent company to EJ EMEA

+ Add additional rows as required



## Section B – Details of companies you import from

Please provide the contact details for each individual company you import from.  
Please confirm in the final column if we are able to contact these companies.

Exporter/Supplier name	Address	Contact Details	Can we contact Y/N
Supplier A (REDACTED Commercially Sensitive)	REDACTED Commercially Sensitive	REDACTED – personal information	Y

+ Add additional rows as required



## Section C – Sales, imports and domestic purchases

### C1 – Total company revenue

Please provide your company's total revenue and the revenue of the goods subject to review:

POI: 1 October 2021 – 30 September 2022	Value in GBP (£)
Total revenue of your company during the POI.	100
Total revenue of your company for the goods subject to review during the POI.	3

### C2 – Your imports of the goods subject to review

Please provide the total volume and value of the goods subject to review imported by your company from The People's Republic of China during the POI:

POI: 1 October 2021 – 30 September 2022	Volume Kgs	Value in GBP (£)
The goods subject to review imported into the UK during the POI <i>(Sum of next three rows should match volume/value of this row)</i>	100	100
The goods subject to review imported into the UK during the POI and resold in the UK	96	95
The goods subject to review imported into the UK during the POI and consumed by your own company	0	0
The goods subject to review imported into the UK during the POI and exported	4	5



Please provide the total volume and value of the like goods **imported** by your company from **all other countries** during the POI:

POI: 1 October 2021 – 30 September 2022	Volume Kgs	Value in GBP (£)
The like goods imported into the UK during the POI <i>(Sum of next three rows should match volume/value of this row)</i>	100	100
The like goods imported into the UK during the POI and <b>resold</b> in the UK	99.9	99.9
The like goods imported into the UK during the POI and <b>consumed</b> by your own company	0	0
The like goods imported into the UK during the POI and <b>exported</b>	0.1	0.1

### C3 – Like goods purchased from a UK producer

If you have also **purchased like goods** from a **UK producer** during the POI, please provide the total sales volume and total sales price value of your purchases in the table below.



	<b>Volume Kgs</b>	<b>Value in GBP (£)</b>
Like goods purchased from UK producers during the POI  <i>(Sum of next three rows should match volume/value of this row)</i>	100	100
Like goods purchased from UK producers during the POI and <b>resold</b> in the UK market	100	100
Like goods purchased from UK producers during the POI and <b>consumed</b> by your own company	0	0
Like goods purchased from UK producers during the POI and <b>exported</b>	0	0



## 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.

Organisation name	Website
Wrekin Products Limited	www.wrekinproducts.com
Clark-drain Limited	www.clark-drain.com
R&B UK JT Limited	www.randb-uk.com
Eccles (UK Foundries FE) Limited	www.ecclesproducts.com
Alumasc	www.alumascwms.co.uk
Saint-Gobain PAM	www.saint-gobain-pam.co.uk
Thomas Dudley Limited	www.thomasdudley.co.uk

### 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



Redacted – commercially sensitive.

### 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?

Click or tap here to enter text.

### 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.



		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>	<b>1, numeric</b>	<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.



Our opinion is that the PCN code system is logical.

**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					
2					
3					
4					

**D6 – Anything else**



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

Redacted – commercially sensitive.

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)).