



Pre-Sampling Questionnaire (Producer)
Transition review of anti-dumping measures
Case TD0061: Bicycles and certain bicycle parts
originating in the People's Republic of China
(including bicycles consigned from Cambodia,
Indonesia, Malaysia, Pakistan, the Philippines, Sri
Lanka and Tunisia)

Period of Investigation (PoI):	<input type="text" value="1 July 2023 – 30 June 2024"/>
Injury Period:	<input type="text" value="1 July 2020 – 30 June 2024"/>
Deadline for response:	<input type="text" value="6 September 2024"/>
Case team contact:	<input type="text" value="TD0061@traderemedies.gov.uk"/>
Completed on behalf of:	<input type="text" value="Brompton Bicycles 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 **6 September 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 consider whether the dumping of imports of Bicycles and certain bicycle parts originating in 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 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 Bicycles and certain bicycle parts 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 either relevant Pre-Sampling Questionnaire (PSQ) for importer or exporter. 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 importation of dumped goods and injury continuing or recurring if either 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 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 personal contact



information, names and signatures. Figures can be replaced with appropriate ranges.

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/TD0061/>.

Deadline for response

A completed PSQ (confidential and non-confidential versions) must be submitted to the TRA by no later than **6 September 2024**. If you are unable to provide a completed submission by the given due date and you wish to request an extension, please contact TD0061@traderemedies.gov.uk. Extensions will only be granted with reasonable justification 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

Category 1 Goods (Bicycles)

This transition review covers bicycles and other cycles (including delivery tricycles, but excluding unicycles), not motorised originating from the PRC (including bicycles consigned from Cambodia, Indonesia, Malaysia, Pakistan, the Philippines, Sri Lanka and Tunisia).

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

87 12 00 30 10	87 12 00 30 90	87 12 00 70 92
87 12 00 30 20	87 12 00 70 91	87 12 00 70 99



Category 2 goods (certain bicycle parts)

This transition review also covers certain bicycle parts originating from the PRC, in quantities of 300 or more units per month (per type), including:

- brake levers
- coaster braking hubs
- complete wheels with or without tubes, tyres and sprockets
- crank-gear
- derailleur gears
- frames (painted, anodised, polished or lacquered)
- free-wheel sprocket-wheels
- front forks (painted, anodised, polished or lacquered)
- handlebars
- hub brakes

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

87 14 91 10 31	87 14 93 00 19	87 14 99 10 99
87 14 91 10 35	87 14 94 20 99	87 14 99 50 91
87 14 91 10 39	87 14 94 90 19	87 14 99 50 99
87 14 91 30 35	87 14 96 30 90	87 14 99 90 19
87 14 91 30 39	87 14 99 10 89	

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

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: 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 [C3 – 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 PRC (and for the case of category 1 goods, other than Cambodia, Indonesia, Malaysia, Pakistan, the Philippines, Sri



Lanka and Tunisia), 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 amount 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 [C7 – 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/TD0061/>.



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 please refer to above section on the scope of this review.

- producer of the like goods (category 1) in the UK
- producer of the like goods (category 2) in the UK
- other (please give details below)

If you have selected 'other', please describe the role of your company with regards to goods subject to review or like goods:

Click or tap here to enter text.



Please describe your interest in this review:

Brompton Bicycles is the largest manufacturer of bikes in the UK.

Around [REDACTED – COMMERCIALY SENSITIVE DATA] of our sales are in the UK and cheap poorly made bikes dumped into the UK market would cause material harm to our sales and jeopardise jobs at the London Factory and at small bike shops who would not be able to compete with cheap imports which will most likely be sold online or chain retailers.

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 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 with associated parties could include production, domestic sales, export sales, and/or further processing of the like goods.

	Company name	Company location (city, country)	Activities	Relationship
Associated Party 1				
Associated Party 2				

+ Add additional rows as required



Section B – Production, sales and imports

B1a – Production (Category 1 – Bicycles)

Please fill in your company's total UK production volume and capacity for the like goods (category 1) in the table below.

	Volume KG	Units
Overall production of the like goods during the POI	<u>550,000 – 750,000</u>	<u>49,000- 67,000</u>
Total production capacity of the like goods during the POI	<u>3,000,000 – 3,500,000</u>	<u>250,000- 350,000</u>

B1b – Production (Category 2 – Bike parts)

Please fill in your company's total UK production volume and capacity for the like goods (category 2) in the table below.

	Volume KG	Units
Overall production of the like goods during the POI	<u>N/A</u>	<u>N/A</u>
Total production capacity of the like goods during the POI	<u>N/A</u>	<u>N/A</u>

B2a – Sales volume and value (Category 1- Bicycles)

Please provide your UK sales data for the like goods (**category 1**) produced in the UK by your company.

	Volume KG	Units	Value in GBP (£)
UK sales of the like goods produced in the UK during the POI	125,000-175,000	10,500-14,500	£13,000,000 - 17,250,000



B2b – Sales volume and value (Category 2- Bike parts)

Please provide your UK sales data for the like goods (**category 2**) produced in the UK by your company.

	Volume KG	Units	Value in GBP (£)
UK sales of the like goods produced in the UK during the POI	0	0	0



B3a – Imports and Sales (Category 1 – Bicycles)

If your company has also imported the goods subject to review (category 1) from the PRC including consignments from, whether or not declared as originating in, Cambodia, Indonesia, Malaysia, Pakistan, the Philippines, Sri Lanka, or Tunisia or like goods from any other country and sold them in the UK during the POI, provide your sales data for these imported goods.

	Volume KG	Units	Value in GBP (£)
Imports of the goods subject to review (category 1) from <i>the PRC</i> during the POI	0	0	0
Imports of the goods subject to review (category 1) from Cambodia, Indonesia, Malaysia, Pakistan, the Philippines, Sri Lanka, or Tunisia during the POI	0	0	0
Imports of the like goods (category 1) from countries other than <i>the PRC</i> , Cambodia, Indonesia, Malaysia, Pakistan, the Philippines, Sri Lanka, or Tunisia during the POI	0	0	0
UK sales of the goods subject to review (category 1), imported from the PRC during the POI	0	0	0
UK sales of the goods subject to review (category 1), imported from Cambodia, Indonesia, Malaysia, Pakistan, the Philippines, Sri Lanka, or Tunisia during the POI	0	0	0
UK sales of the like goods (category 1), imported from countries other than the PRC, Cambodia, Indonesia, Malaysia, Pakistan, the Philippines, Sri Lanka, or Tunisia during the POI	0	0	0



B3b – Imports and Sales (Category 2 – Bike parts)

If your company has also imported the goods subject to review (category 2) from the PRC or like goods from any other country and sold them in the UK during the POI, provide your sales data for these imported goods.

	Volume KG	Units	Value in GBP (£)
Imports of the goods subject to review (category 2) from the PRC during the POI	90-120	14,000-16,000	£35,000- £45,000
Imports of the like goods (category 2) from countries other than the PRC during the POI	0	0	0
UK sales of the goods subject to review (category 2), imported from the PRC during the POI	0	0	0
UK sales of the like goods (category 2), imported from countries other than the PRC during the POI	0	0	0

B4 – 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 (for category 1 goods) and enclose this here for you now.

Category	Code	Type
Bicycle type	A	ATB (all-terrain bicycles including mountain bicycles, above 24")



	F	Foldable
	J	Junior action (BMX) and children's bicycles (24" and below)
	R	Road / Race (above 24")
	T	Trekking/city/hybrid/touring bicycles (above 24")
	O	Other (e.g. delivery, cargo, tricycle)
Suspension	0	None
	1	Front suspension
	2	Dual / full suspension
Frame material	A	Aluminium
	C	Carbon Fibre/Composite
	S	Steel (hi-tensile)
	T	Titanium
	O	Other
Fork leg material	A	Aluminium
	C	Carbon Fibre/Composite
	S	Steel (hi-tensile)
	T	Titanium
	O	Other
Gear numbers	2 digits	Number of gears
Gear type	I	Internal (hub)
	D	Derailleur
Brake	M	Mechanical
	H	Hydraulic - Disc

EXAMPLE	
F2AA06DH	Foldable bicycle with dual suspension, an aluminium frame and fork, with 6 gears, using a derailleur and Hydraulic brakes.

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.

These appear to cover our main product lines



Section C – Additional information

C1 – 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
Make UK	https://www.makeuk.org/
Hydro	https://www.hydro.com/en/en/
EBMA	www.ebma-brussels.eu
Beryl Bikes	https://beryl.cc/
Urban Mobility Partnership	https://urbanmobilitypartnership.com/

C2 – Particular Market Situation

If you have any concerns or information about the possible existence of a particular market situation in the PRC, 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



The Government of China heavily subsidises the companies that manufacture bikes. This includes direct subsidies and tax benefits. This has created and continues to encourage massive levels of overcapacity in Chinese manufacturers. This when combined with far lower operations and staff costs creates an artificially low price. This aggressively encourages Chinese exporters to target export markets where trade barriers are not in place. Local manufacturers in these markets are unable to compete with these artificial prices.

These market distortions in China, their systemic nature and prevalence in the bicycle sector are well-documented. Numerous government plans, policies, guidelines and strategies on central, provincial and local level (notably the 14th 5-Year Plan for Bicycles and Electric Bicycles) have created a system of substantial state-ownership and state-influence and control over the bicycle and e-bike industry, characterised by aggressive export policies, vertically integrated bicycle giants and strong cooperation between local producers. Export prices of Chinese bicycles therefore do not reflect market prices, but rather unfair prices made possible by the massive support of the Chinese state policies. A particular market situation therefore exists on the Chinese market, which renders the domestic prices unfit for a proper comparison.

Unless the UK government are willing to provide a subsidies and tax breaks for UK manufacturers of bikes, it is impossible to compete.

This will result in the closure of UK bike manufacturing jeopardising jobs. In the case of Brompton alone, this risks over 800 jobs, 650 of whom are working in a deprived area of West London and are paid a minimum of the London Living Wage

C3 – 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.

C4 – 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	<i>Performance Cycling (Tredz)</i>	Cardiff, Swansea	[REDACTED]	Client	N
2	<i>Fudge & Sons</i>	National	[REDACTED]	Client	N
3	<i>Balfes Bikes</i>	London	[REDACTED]	Client	N
4	<i>Condor Cycles</i>	National	[REDACTED]	Client	N
5	Cycle Solutions (Cycle to Work) Limited	National	[REDACTED]	Client	N



6	Alhonga	National	[REDACTED]	Supplier	Y
7	<i>Sun Race / Sturmey- Archer</i>	National	[REDACTED]	Supplier	Y
8	<i>Jagwire- Europe</i>	National	[REDACTED]	Supplier	Y
9	<i>Halfords Group plc</i>	National	[REDACTED]	Client	Y
10	<i>Evans Cycles</i>	National	[REDACTED]	Client	N
11	<i>Lunar Cycles</i>	National	[REDACTED]	Client	N
12	XLR8 Sports Ltd	National	[REDACTED]	Client	N

COMMENT: This is not a comprehensive list. Brompton has over [REDACTED] registered retailer clients across the UK

C5 – Anything else

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



Brompton is intending to invest in building a new Factory to manufacture our bikes. It is expected this Factory will build over [REDACTED – COMMERCIALLY SENSITIVE INFORMATION] bikes per annum and will employ around [REDACTED – COMMERCIALLY SENSITIVE INFORMATION] staff in [REDACTED – COMMERCIALLY SENSITIVE INFORMATION]. This investment and these jobs are at risk if the UK market becomes flooded with artificially cheap bikes.

Thanks to the existing AD measures, there is a level playing field in the UK bicycles market. The AD measures ensure that the market is supplied by UK-produced bicycles, imports of bicycles from China, and imports from other countries. Consumers in the UK have therefore a wide range of options when purchasing bicycles.

Without AD measures, imports of cheap Chinese bicycles would quickly flood the market, which would drive UK producers out of the market and would also prevent importers from importing bicycles from other countries. The US, Japanese and Canadian markets are illustrative of the detrimental effects of not imposing or of removing AD measures: domestic production died out, demand stagnated, and imports from China took over the entire market, leaving consumers with no options other than bicycles imported from China.

In light of these developments and the broader objective of a sustainable mobility policy, the EU institutions have recently recognised the importance of the existing trade defence measures for the EU market. The European Commission's 2024 Mobility Transition Pathway underlines the importance of a level playing field by means of trade defence instruments (here), and the 2024 European Declaration on Cycling commits to the "maintenance of a global level-playing field through existing EU trade defence Instruments" (here). EU AD duties protect the EU industry from unfair competition since 1993 and the Commission opened an expiry review of the current EU measures on imports of bicycles from China on 30 August 2024. In 2019, the EU also imposed AD and AS measures on imports of e-bikes from China.

It is equally important to continue the AD measures in the UK. The AD measures are of vital importance for the UK bicycle production sector, including bicycle importers and consumers 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 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).