



Registration form for interested parties and contributors

Case No.: AS0079

Anti-subsidy investigation

Creamy/White Limestone exported from Portugal

Completed on behalf of (provide the name of your business or organisation):	Associação Portuguesa da Indústria dos Recursos Minerais – ASSIMAGRA (Portuguese Association of Mineral Resources Industry)
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Note:

Please provide **two copies of your response to this form**: 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).

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

- Confidential
- Non-confidential (will be made available on the public file: <https://www.trade-remedies.service.gov.uk/public/cases/>)

Deadline for response:	29 January 2026
Case team contact:	AS0079@traderemedies.gov.uk



Introduction

Registration of interest to the investigation

We invite interested parties and contributors to **register** their interest in this investigation **by completing the relevant sections** as indicated in this form **and submitting the completed form** using the Trade Remedies Service (www.trade-remedies.service.gov.uk).

An interested party is either:

- a government of the foreign country or territory subject to the investigation;
- an overseas exporter, an overseas producer or an importer of the goods subject to the investigation;
- a UK producer of goods that are like the goods subject to the investigation; or
- a trade or business association representing one or more of the above parties.

A contributor is a person or organisation who is not an interested party but who wants to register so that they can participate in an investigation.

Scope of the investigation

Goods concerned	Creamy/White limestone from Portugal in the form of slab and finished stone. Slab refers to natural stone that has been simply cut or sawn. Finished stone refers to natural stone that has been processed and worked in a factory.	
Period of investigation (POI)	1 January 2025 to 31 December 2025	
Alleged subsidies	14 subsidy programmes made up of 11 grants and 3 non-refundable financing programs.	
	Subsidy name	Subsidy type
	INOVSTONE 4.0 - Advanced Technology and Software for Natural Stone	Grant
	INOVMINERAL 4.0 - Advanced Technology and Software for Natural Stone	Grant
	LSI StoneWorld	Grant
	LSI Stone Digital Factory	Grant
	Sustainable Stone by Portugal Agenda	Grant



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	Business Innovation Project - POCI-02-0853-FEDER-047397	Grant
	Business Innovation Project - CENTRO-02-0853-FEDER-018610	Grant
	SME INTERNATIONALIZATION PROGRAM	Grant
	Hiring of Highly Qualified Human Resources (SME or CoLab)	Grant
	SDF 365 – Stone Digital Fabrication	Grant
	INTERSTONE	Grant
	PRR Project Incorporation of Renewable Energy and Energy Efficiency Measures	Non-refundable financing
	PRR Project Intelligent Automation in Natural Stone Extraction	Non-refundable financing
	PRR Project PRODUTECH R3 - Mobilizing Agenda for the Production Technologies Sector for Reindustrialization	Non-refundable funding

For further details, please refer to the *Notice of Initiation* on the public file:
<https://www.trade-remedies.service.gov.uk/public/cases/>.

Completing this registration form and pre-sampling questionnaire

To register to this case, you need to provide two copies of your response to this form: a confidential and a non-confidential version. Your non-confidential version should be as similar as possible to your confidential version except for the redaction of the confidential information.

Both copies must be returned to the TRA by 29 January 2026 using the Trade Remedies Service (www.trade-remedies.service.gov.uk).

The non-confidential version of your registration form and pre-sampling questionnaire may be placed on the public file: <https://www.trade-remedies.service.gov.uk/public/cases/>.

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](#)¹ for further information on providing confidential information and non-confidential summaries.

All information provided to the TRA in confidence will be treated as confidential in accordance with regulation 45 of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 (the Regulations) and only used for this investigation (except in limited circumstance as permitted by regulation 46 of the Regulations) and will be stored in protected systems.

Request to complete a detailed questionnaire

If, on the basis of the information provided in this form, we determine that you are an overseas exporter or an importer of the goods subject to the investigation a UK producer of goods that are like the goods subject to the investigation, we will ask you to complete a detailed questionnaire to inform this investigation.

If we consider it appropriate, we may only ask a sample of overseas exporters, importers and/or UK producers to complete a detailed questionnaire. By submitting this completed registration form and pre-sampling questionnaire, you agree that you may be included in any such sample.

If your business is included in the sample, you will be asked to respond to the questions in the detailed questionnaire and to support the TRA in verifying your responses. This may involve the TRA carrying out a verification visit to your premises.

If you are an overseas exporter and indicate that you do not agree to possible inclusion in a sample, your business may be deemed not to have cooperated in the investigation. The TRA will base its findings for non-cooperating parties on facts available. This may result in an outcome that is less favourable to your business than if it had cooperated.

If we decide to sample overseas exporters, and your business is not selected for this sample, you may submit a request to us to calculate individual margins for your business. We will accept your request providing that:

- you submit the required information on time; and
- the number of exporters subject to examination is not so large that complying with the request would be unduly burdensome and risk preventing the timely completion of the investigation.

¹ <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/the-tras-investigation-process>



Section A: About your business or organisation

A1. Your business' or organisation's activities

1. To determine your business' or organisation's role for the purpose of this investigation, please select all of the following options that are applicable to your business or organisation. Please refer to the period of investigation (POI) defined on page 2.

- [A1.1] During the POI, we produced the goods concerned in Portugal.
Note: Please complete sections A2 and B.
- [A1.2] During the POI, we directly exported the goods concerned from Portugal to the UK.
Note: Please complete sections A3 and B.
- [A1.3] During the POI, we indirectly exported the goods concerned from Portugal to the UK via a third party (located either in Portugal or a third country not subject to the investigation).
Note: Please complete sections A3 and B.
- [A1.4] During the POI, we imported the goods concerned originating in Portugal to the UK.
Note: Please complete sections A4 and B.
- [A1.5] During the POI, we produced goods that are like the goods concerned in the UK.
Note: Please complete sections A5 and B.
- [A1.6] Other.
Note: Please complete section B.

If you are not a Foreign Government body, please **do not complete** section B5.

2. If you selected 'Other' [A1.6], please describe the activity/activities of your business or organisation and your business' or organisation's interest in this investigation in the field below.

I. LEGAL FRAMEWORK AND INSTITUTIONAL LEGITIMACY

1.1. National Representativeness Status

ASSIMAGRA is the national association representing the mineral resources industry in Portugal, holding the status of *public utility* since its foundation in 1964. With more than 200 member companies, ASSIMAGRA is the sole representative body with full institutional legitimacy to collectively represent the Portuguese natural stone sector before national and international entities.



Its statutory mission focuses on the continuous promotion and strengthening of Portuguese mineral resources, aiming to expand their economic, social, and cultural recognition, while upholding principles of sustainability. This mission grants ASSIMAGRA not only the mandate but also the institutional duty to intervene in processes affecting the collective interests of the sector's companies.

1.2. Alignment with the Concept of “Interested Party”

Under UK legislation governing investigations by the Trade Remedies Authority (TRA), interested parties explicitly include “trade or business associations representing producers, exporters or other entities directly involved” in the products under investigation. ASSIMAGRA clearly falls within this definition, representing:

- **Producers** of Portuguese creamy/white limestone, both in slab and finished stone form;
- **Exporters** marketing these products internationally, including in the UK;
- **Processing companies** adding value to the national mineral resources.

Collective representation through sectoral associations is not only permitted but encouraged within the UK trade remedies framework, acknowledging that SMEs — which make up the vast majority of ASSIMAGRA's members — often lack the technical, legal, and financial capacity to participate effectively on an individual basis.

II. DIRECT IMPACT ON THE PRODUCT UNDER INVESTIGATION

2.1. Overlap Between Investigated Products and ASSIMAGRA-Promoted Products

Case AS0079 specifically concerns Portuguese creamy/white limestone in two forms:

- **Slabs:** stone that is simply cut or sawn;
- **Finished stone:** fully processed, shaped, and factory-finished stone ready for installation.

These categories match precisely the products ASSIMAGRA actively promotes under its sectoral brand *Stone by Portugal*, including emblematic varieties such as:

- **Creme de Fátima:** light beige limestone, fine- to medium-grained, widely used in high-profile architectural projects;
- **Semi-Rijo do Codaçal:** light cream-colored oolitic limestone, recognized for its technical and aesthetic quality.

These varieties feature in international projects promoted by ASSIMAGRA in strategic markets such as the UK, USA, and China. The AS0079 investigation therefore directly and materially affects the core products in the sector's internationalization strategy.

2.2. Economic and Export Relevance of the Sector

The Portuguese natural stone sector, represented by ASSIMAGRA, demonstrates clear strategic and economic importance:

- **Gross Value Added (GVA):** approximately €750 million (2024);
- **Total exports:** around €500 million annually (€487.6M in 2024);



- **Export destinations:** 121 countries in 2024, showing strong global presence;
- **Key markets:** France (€97M), China (2nd largest), Spain, USA, and the UK (typically 4th largest).

The potential imposition of countervailing duties by the UK would directly harm the competitiveness of Portuguese exports to this market, affecting not only turnover but also the international reputation of Portuguese stone as a premium and high-quality product. This substantiates ASSIMAGRA's legitimate interest in active participation in Case AS0079.

III. DEFENDING COMPETITIVENESS AND INTERNATIONAL POSITIONING

3.1. Internationalization and Collective Promotion Strategy

ASSIMAGRA developed and manages the *Stone by Portugal* brand, a strategic initiative promoting Portuguese natural stone's excellence and distinct identity abroad.

It cooperates closely with AICEP (Portuguese Trade & Investment Agency) in identifying priority markets and analyzing export potential. This institutional partnership demonstrates ASSIMAGRA's central role in the national internationalization strategy for the stone sector.

Given that the AS0079 investigation may result in measures negatively affecting trade with the UK — a strategic market for high-end construction and heritage restoration — ASSIMAGRA has a direct and legitimate interest in ensuring that Portuguese stone's competitiveness is not unfairly harmed by unfounded or mischaracterized subsidy allegations.

3.2. Quality Management and Certification (STONE.PT)

ASSIMAGRA manages the *STONE.PT* certification system, designed to distinguish Portuguese stone through:

- Certified quality labels;
- Independent certification by accredited laboratories;
- Traceability and guaranteed origin;
- Compliance with strict technical specifications.

This system is essential for safeguarding the integrity and reputation of Portuguese stone in international markets. ASSIMAGRA's participation in Case AS0079 is crucial in order to:

- Properly **contextualize national support programs** cited in the British applicant's submission, demonstrating they correspond to legitimate policies of regional development and sustainability;
- **Defend the market positioning** of STONE.PT-certified products, ensuring they are not wrongly described as recipients of distortive subsidies;
- **Protect the collective reputation** of the sector against claims that could undermine decades of investment in quality, innovation, and differentiation.



IV. TECHNICAL CAPACITY AND INSTITUTIONAL EXPERTISE

4.1. Technical Competence and Sector Knowledge

ASSIMAGRA possesses the technical expertise and in-depth sector knowledge required to contribute substantively to Case AS0079.

Technical and Scientific Partnerships:

- EUROROC
- NSSA – Natural Stone Strategic Alliance
- Accredited laboratories for natural stone testing
- Participation in the Technical Committee CT 118 (Ornamental Rocks) for standardization

Knowledge of Government Support Programs:

ASSIMAGRA has detailed insight and direct experience in implementing government support initiatives for the sector, allowing it to provide TRA with accurate, contextualized, and verifiable information regarding the legal and policy framework of such programs — proving they pursue legitimate public policy objectives (energy efficiency, sustainability, regional development) rather than market distortion.

This longstanding technical and institutional experience ensures that ASSIMAGRA can engage constructively, efficiently, and professionally in the AS0079 process, supplying credible and verifiable data relevant to the TRA's assessment.

V. COLLECTIVE REPRESENTATION OF PORTUGUESE SMES

5.1. SME Limitations in Individual Participation

The Portuguese natural stone sector is predominantly composed of SMEs. Despite strong technical and productive capability, these companies face substantial challenges in individually participating in complex foreign legal proceedings:

- **Limited technical resources:** lack of in-house international trade legal departments;
- **High costs:** need to hire specialized trade remedies consultants;
- **Procedural complexity:** demanding questionnaires, tight deadlines, dual confidential/non-confidential filings;
- **Language and cultural barriers:** limited familiarity with UK legal system and technical terminology;
- **Risk of non-cooperation:** incomplete responses may lead to adverse determinations.

5.2. Added Value of ASSIMAGRA's Collective Representation

ASSIMAGRA's registration as an interested party on behalf of the sector provides significant benefits to both the companies and the TRA:

For Portuguese companies:

- Resource efficiency through shared representation and technical expertise;
- Consistent and coordinated sectoral arguments;



- Protection of commercially sensitive data through aggregated information;
- Faster and more complete responses to TRA requests.

For the Trade Remedies Authority:

- Administrative efficiency via a single qualified interlocutor for the Portuguese sector;
- Enhanced information quality with verified sectoral data;
- Assured representativeness of the Portuguese industry's collective perspective;
- Reduced duplication from multiple potentially inconsistent individual submissions.

Such collective representation is expressly allowed and encouraged by the UK's trade remedies system, recognizing business associations as legitimate interested parties.

VI. PUBLIC INTEREST AND DEFENSE OF NATIONAL ECONOMIC INTERESTS

6.1. National Public Interest Dimension

ASSIMAGRA's participation exceeds private company interests, embodying a matter of public interest and national economic defense:

- **Regional development and employment:**
The natural stone industry is vital for economic development in Central and Alentejo regions, generating significant direct and indirect employment and fostering population retention in low-density areas.
- **Preservation of craftsmanship and heritage:**
The sector preserves centuries-old technical knowledge and traditional practices that constitute intangible cultural heritage. Sustaining this industry ensures preservation of that legacy.
- **Contribution to European policy goals:**
Active involvement in implementing the *Critical Raw Materials Act (CRMA)*, advancing EU strategic autonomy in raw materials, and supporting green transition and circular economy policies.

6.2. Defense Against Potentially Unfounded Allegations

The submission by Albion Stone PLC lists 14 allegedly subsidizing programs, including:

- Direct fund transfers;
- Forgone government revenue (tax incentives);
- Regional development aid;
- Non-reimbursable grants.

Due to its direct knowledge and implementation experience, ASSIMAGRA is uniquely positioned to:

- **Contextualize these programs properly**, showing they fit legitimate regional, environmental, or innovation policy frameworks compliant with WTO and EU rules;



- **Demonstrate** that they are horizontal, transparent, and non-distortive schemes, not export-specific subsidies;
- **Provide aggregated sectoral data** on investment, productivity, and competitiveness, showing that the sector's success derives from structural factors — geology, know-how, and quality — not artificial advantages;
- **Safeguard the sector's reputation** and avoid precedents potentially harmful to future trade cases or market access.

VII. CONCLUSION AND BASIS FOR LEGITIMACY

ASSIMAGRA fully meets all legal, technical, and institutional prerequisites to register as an Interested Party in Case AS0079, collectively representing the Portuguese natural stone sector.

Legal Grounds:

- Explicit inclusion under UK trade remedies legislation as an eligible “interested party”;
- Recognized procedural legitimacy to represent SMEs collectively before the TRA;
- Direct and substantial interest due to the material impact of proposed measures.

Technical Grounds:

- Sectoral expertise: 60 years of representational experience, technical partnerships, and certification management;
- In-depth knowledge of support programs: direct implementation experience and capacity to supply accurate contextualized data;
- International experience: proven record in European and global technical and policy forums.

Institutional Grounds:

- Full national representativeness: sole association with *public utility* status mandated to represent the sector;
- Broad aggregation capacity: over 200 member companies enabling effective collective representation;
- Recognized institutional credibility by Portuguese (AICEP) and international (EU Commission, EDA, etc.) entities.

Public Interest:

- Protection of a strategic national industry (€750M GVA; ~€500M exports);
- Safeguarding employment and regional development in interior regions;
- Alignment with European public policy and sustainability objectives.

ASSIMAGRA's participation in Case AS0079 serves both the legitimate interests of the Portuguese natural stone sector and the TRA's own objective of conducting a robust, well-evidenced, and fair investigation based on factual accuracy, verified data, and contextual understanding.



ASSIMAGRA commits to full, constructive cooperation with the TRA, providing complete and timely information, respecting confidentiality requirements, and contributing toward a balanced and just determination reflecting the real economic conditions and public interest at stake.

ASSIMAGRA – Portuguese Association for the Mineral Resources Industry
On behalf of the Portuguese natural stone sector

- 3. Indicate whether your company is a member of any representative organisations (e.g. a trade body or chamber of commerce). If so, provide a copy of any relevant documentation.

Not applicable. The organisation is itself a representative body.

A2. Production and domestic sales of the goods concerned

Complete this section if you indicated under **A1** that **you are a producer of the goods concerned in Portugal subject to the investigation.**

- 4. Please refer to the description of the goods concerned on page 2. In the field below, describe the goods that you produce and that fall within the description.

[Empty text box for describing goods]

- 5. Please provide your business' total production volumes and production capacity for the goods concerned during the period of investigation (POI) in the table below.

Total production volume (POI) (m3 or kg – please specify which used)	
Total production capacity (POI) (m3 or kg – please specify which used)	

Consider providing these figures in ranges in your non-confidential version of this form.

- 6. Please give details of all associated parties involved with the business in the production and sales (export and/or domestic) of the goods concerned during the period of investigation. 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](#).



Company name	Company location (city, country)	Activities	Relationship

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

7. Please provide the total of your domestic sales volumes and sales values of the goods concerned produced by your business during the POI in the table below.

Total domestic sales volume (POI) (m3 or kg – please specify which used)	
Total domestic sales value (POI) [€]	

Consider providing these figures in ranges in your non-confidential version of this form.

8. Were there significant fluctuations in major input costs (such as raw materials or energy) across the POI, which had a material impact on the overall cost to make of the goods? If yes, please provide details of these fluctuations.

9. Is your company or any of your associated parties related to any company in the UK, particularly any of the UK producers and/or importers of the goods that are like the goods concerned in the UK?

10. Do you produce and/or sell other goods for the UK market other than the goods concerned?

A3. Direct and indirect exports of the goods concerned

Complete this section if you indicated under **A1** that **you are an exporter of the goods concerned from Portugal**.



11. If you are not the producer of the goods concerned that you export to the UK, please provide details for your suppliers of the goods concerned and indicate whether these are the producers of the goods concerned in the table below.

Company name	Company location (city, country)	Relationship to your company	Producer (Y/N)

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

12. Please provide the total of your direct and indirect export volumes and export values of the goods concerned to the UK during the POI in the table below.

Note: Exports to the UK via a third party (whether or not associated to your business), which is located in Portugal or a third country, are to be considered indirect exports.

Total direct export volume (POI) (m3 or kg – please specify which used)	
Total indirect export volume (POI) (m3 or kg – please specify which used)	
Total direct export value (POI) (€)	
Total indirect export value (POI) (€)	

Consider providing these figures in ranges in your non-confidential version of this form.

13. If you exported the goods concerned to the UK via third parties, please provide details for these parties below.

Company name	Company location (city, country)	Activities	Relationship

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

14. Please provide details of the commodity code(s) you export the goods concerned to the UK under in the box below.



15. If your company is part of a larger group of associated companies and subsidiaries, please describe how your company relates to the structure of the group of companies. Please outline if it utilises intra-group loans, cash-pooling, or other mechanisms for the consolidation of resources.

16. Is any of the research and development conducted in relation to the goods your company manufactures performed by other companies within the same corporate group? If so, please provide details.

A4. UK imports of the goods concerned

Complete this section if you indicated under **A1** that **you are an importer of the goods concerned from Portugal**.

17. Please provide the total of your import volumes and import values of the goods concerned originating in/exported from Portugal subject to the investigation to the UK during the POI in the table below.

Total import volume (POI) (m3 or kg – please specify which used)	
Total import value (POI) [€ or £ – please specify which used]	

Consider providing these figures in ranges in your non-confidential version of this form.

18. Please provide details for your suppliers of the goods concerned originating in/exported from Portugal in the table below.

Company name	Company location (city, country)	Activities (producer, trader, etc.)	Relationship

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

19. Please specify your purpose in importing the goods concerned from Portugal. Select all of the following options that are applicable to your business or organisation.



- We resell the goods unchanged to distributors or final customers.
- We process the goods before reselling them to distributors or final customers.
- We use the goods as input in our production of _____.
(specify the product/s).
- We reexport the good to third countries, namely_____
- Other.

20. "If you selected "other", please specify your purpose for importing the goods concerned from the country subject to the investigation in the field below.

21. Please describe how the goods concerned compare to UK produced goods that are like the goods concerned in the field below.

A5. Production and sales of goods produced in the UK that are like the goods concerned

Complete this section if you indicated under A1 that you are a producer in the United Kingdom of goods that are like the goods concerned.

22. Please describe the goods that you produce in the UK and that you consider to be like the goods concerned.

23. Please provide your business' total production volumes and production capacity for UK production of goods that are like the goods concerned during the POI in the table below.



Total production volume (POI) (m3 or kg – please specify which used)	
Total production capacity (POI) (m3 or kg – please specify which used)	

Consider providing these figures in ranges in your non-confidential version of this form.

24. Please provide the total of your domestic and export sales volumes and sales values of the goods that are like the goods concerned produced by your business in the UK during the POI in the table below.

Total domestic sales volume (POI) (m3 or kg – please specify which used)	
Total domestic sales value (POI) [£]	
Total export sales volume (POI) (m3 or kg – please specify which used)	
Total export sales value (POI) [£]	

Consider providing these figures in ranges in your non-confidential version of this form.

25. Were there significant fluctuations in major input costs (such as raw materials or energy) across the POI, which had a material impact on the overall cost to make of the goods? If yes, please provide details of these fluctuations.

26. Do you produce and/or sell other goods for the UK market other than the goods that are like the goods concerned in the UK?



Section B: Additional information

B1. Other interested parties

27. We need contact information in order to notify potentially interested parties. Please provide contact details of any other known exporters, importers of the goods concerned and UK producers of the goods that are like the goods concerned in the UK in the table below

Name	Website	email

Add additional rows as required

28. Please provide a list of as many of the following domestic companies as possible:

- Those that produce goods that are like the goods concerned in the UK;
- Those that are involved in the importation, distribution, or sale of goods that are like the goods concerned from third countries;
- Those that are producer or sell raw materials used in the production goods that are like the goods concerned in the UK
- Those that purchase the product, including those that sell use product in their products or services; and those that sell product directly to consumers
- Please specify which category they belong to.

B2. Scope

29. If you consider that the goods description in scope of the investigation should be varied, please specify the suggested changes and provide your reasons in the field below.

B3. Product control numbers



The TRA uses product control numbers (PCNs) to define and distinguish the different types or subcategories of goods that fall under the goods description of the goods concerned. Subcategories are developed on the basis of differences in the physical and/or commercial characteristics of the goods which may impact the price at which each subcategory is sold.

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 UK and those produced in the country subject to an investigation.

We have created the following draft PCN table:

Category	Code	Description
Type of stone	S01	Limestone
	S02	Travertine
	S03	Other calcareous stone
	S04	Non-calcareous stone
Colour of stone	C01	Creamy/White
	C02	Other colour
Form of stone at sale	F01	Block
	F02	Slab/Scant
	F03	Finished Stone
	F04	Loadbearing
	F05	Other
Volume of stone in m3	V01	0.000 m3 to ≤ 0.699 m3
	V02	> 0.699 m3 to ≤ 0.999 m3
	V03	> 0.999 m3
	T01	20mm
Thickness	T02	30mm
	T03	40mm
	T04	50mm
	T05	75mm
	T06	100mm
	T07	150mm
	T08	Other
	L01	600mm
Length	L02	700mm
	L03	800mm
	L04	900mm
	L05	1000mm



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	L06	1100mm
	L07	1200mm
	L08	1300mm
	L09	1400mm
	L10	1500mm
	W01	400mm
Width	W02	500mm
	W03	600mm
	W04	700mm
	W05	800mm
	W06	900mm
	W07	1000mm
	W08	1100mm
	W09	1200mm
	W10	1300mm
	W11	Other
	C01	0 Hours
Time on CNC Saw	C02	1 Hour
	C03	2 Hours
	C04	3 Hours
	C05	4 Hours
	C06	5 Hours
	C07	6 Hours
	C08	7 Hours
	C09	8 Hours
	C10	9 Hours
	C11	10 Hours
	C12	11 Hours
	C13	12 Hours
	C14	13 Hours
	C15	14 Hours
	C16	Other
	M01	0 Hours
Time with Masons	M02	1 Hour
	M03	2 Hours
	M04	3 Hours
	M05	4 Hours



	M06	5 Hours
	M07	6 Hours
	M08	7 Hours
	M09	8 Hours
	M10	9 Hours
	M11	10 Hours
	M12	11 Hours
	M13	12 Hours
	M14	13 Hours
	M15	14 Hours
	M16	Other
	S01	Honed
Surface Finish	S02	Fine Rubbed
	S03	Brushed
	S04	Other

30. Please review the above draft PCN structure for this investigation and comment in the field below whether the PCN structure is adequate and appropriate to categorise the goods produced, exported and/or imported by your business.

31. Please provide details of any technical or physical characteristic not included in the PCN structure that may affect the price comparison between the goods concerned and the goods that are like the goods concerned in the UK

Physical and Mechanical Laboratory tests that can make direct comparison between stones, that can attest their competence, and applicable specifications and conditions, like:

- flexural strength [MPa]
- flexural strength after freeze* [MPa]
- compressive strength [MPa]
- apparent bulk density [kg/m³]
- open porosity [%]
- mineralogical composition
- water absorption [%]



32. If you are an overseas exporter or importer of the goods concerned or a UK producer of the goods that are like the goods concerned in the UK, comment on whether the proposed PCN structure adequately aligns with your goods range. In particular, we would welcome your comments on

- the categorisation of product features;
- the list of products included in the “other” category and whether this prevents a fair comparison between PCNs; and
- whether you produce, or are aware of, any specialised products that fall within the definition of the goods concerned or are like the goods concerned in the UK which have a sufficiently different price point to make them unsuitable for comparison with the other sub-categories of the “goods concerned”.
- Do you export, produce or import any goods that could be categorised under more than one PCN? If so, please suggest any changes to the proposed PCN structure?

33. Please provide details of any manufacturing process differences which you think may influence the PCN structure and the price comparison between the goods concerned or are like the goods concerned in the UK.

B4. Economic Interest Test

34. If, following an investigation or review, we conclude that a measure should be imposed or extended, we conduct an Economic Interest Test (EIT) to determine whether the proposed 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 UK upstream companies (providing inputs for the manufacture of the goods that are like the [goods concerned) and UK customers (downstream companies buying the goods). Please confirm in the final column if we are able to contact these companies.

Company name	Company location (city, country)	Contact details (email/tel.)	Relationship	Contact permission (Y/N)



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[Add additional rows as required]

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

B5. Questions for the Foreign Government of the exporting country (Portugal)

Please complete this section if you are a Foreign Government body of the exporting country.

The below table sets out the allegations of subsidies provided to exporters of the goods concerned.

Subsidy name	Subsidy type
INOVSTONE 4.0 - Advanced Technology and Software for Natural Stone	Grant
INOVMINERAL 4.0 - Advanced Technology and Software for Natural Stone	Grant
LSI StoneWorld	Grant
LSI Stone Digital Factory	Grant
Sustainable Stone by Portugal Agenda	Grant
Business Innovation Project - POCI-02-0853-FEDER-047397	Grant
Business Innovation Project - CENTRO-02-0853-FEDER-018610	Grant
SME INTERNATIONALIZATION PROGRAM	Grant
Hiring of Highly Qualified Human Resources (SME or CoLab)	Grant
SDF 365 – Stone Digital Fabrication	Grant
INTERSTONE	Grant
PRR Project Incorporation of Renewable Energy and Energy Efficiency Measures	Non-refundable financing
PRR Project Intelligent Automation in Natural Stone Extraction	Non-refundable financing
PRR Project PRODUTECH R3 - Mobilizing Agenda for the Production Technologies Sector for Reindustrialization	Non-refundable funding



35. Please identify the level of government which these programmes are granted/managed at (e.g. national, provincial/municipal, prefectural, county). Please name the relevant authorities.

36. Please provide any further information on the programmes in the table that you consider relevant.

B6. Other comments

37. Please use the field below to provide additional information that you consider relevant to this investigation.

If you have any information about any alleged subsidies in the country subject to the investigation that are affecting the production or sales of the goods concerned, please provide details in the box below.

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).