



Importer Questionnaire

Case number: 1/2025

Product: *Silicon metal*

From: The People's Republic of China

Inquiry period: 1 January 2024 – 30 June 2025

Section	Response due by
A	10 December 2025
B, C, D & E	2 January 2026

Email response to: samradsnefndtolla@fjr.is

See the Committee on Anti-Dumping and Countervailing Duties' website: <https://www.stjornarradid.is/undirbods-og-jofnunartollar>

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Instructions

Why you have been asked to fill out this questionnaire?

The Advisory Committee on Anti-Dumping and Countervailing Duties (the committee) is conducting an inquiry into silicon metal (the goods) exported to Iceland from the People's Republic of China (China). The Anti-Dumping Notice No.1/2025, available on the committee's website, provides details of the goods under consideration, the application and the investigation procedures.

This questionnaire requests information about your imports and sales of goods exported to Iceland. The data provided will be used to determine export and non-injurious prices, to establish the structure of the Icelandic market for the goods, and to assess the applicant's injury claims.

The committee will collect and use information in accordance with Article 44 of regulation No. 351/1994, on the preparation and implementation of levy and collection of anti-dumping and countervailing duties, Article 6 of the WTO Agreement on implementation of Article VI of the GATT 1994 and Article 12 of the WTO Agreement on subsidies and countervailing measures.

The committee appreciates that some of these documents, particularly financial statements, may be confidential to your business and understands a possible reluctance to supply such sensitive information.

Where appropriate, certain information and supportive evidence may be given on a confidential basis in the version of your response marked "sensitive version". Sensitive information, i.e. business secrets etc., will not be made available to any other interested party. However, a version of your response "non-confidential version" will be available on the committee's website for all interested parties. Your non-confidential submission must contain sufficient detail to allow a reasonable understanding of the substance of the confidential version. If, for some reason, you cannot produce a non-confidential summary, please contact the Committee. (see contact details on page 1 of this questionnaire). Where a meaningful summary is not provided, and where the information is susceptible of such summary, the information submitted may be disregarded in accordance with Article 44, paragraph 5 of regulation No. 351/1994

Please limit the amount of personal data in the non-confidential version to the strict necessary for interested parties to defend their interests appropriately during the investigation. To the extent possible, remove personal data from the non-confidential version.

You are required to make a declaration that the information contained in your response is complete and correct. You must return the signed declaration of an authorised person at end of this questionnaire with your response.

If you do not import the goods or unsure whether you import the goods

Our customs records indicate that your company is an importer of the goods, and as such, your company is being asked to complete this importer questionnaire. If this is incorrect and your company is not an importer of the goods, or if you are unsure whether the products imported by your company are the goods, please contact the committee as soon as possible.

What happens if you do not respond to this questionnaire?

You do not have to complete the questionnaire. However, if you do not respond, do not provide all the information sought, do not provide information within a reasonable time, or do not allow the committee to verify the information, this may affect how the dumping margin and/or subsidy margin applicable to your supplier is determined.

Extension requests

If you require a longer period to complete all or parts of your response to this importer questionnaire, you must submit a request to the committee, in writing, for an extension to the due date for all or part of the questionnaire. This request must be made prior to the due date. **A request for extension will be rejected if received after the due date.**

When considering the extension request, the committee will have regard to its responsibility to conduct the case in a timely and efficient manner and the reason why the response cannot be provided within the period originally available.

You will be informed of the decision whether your request for an extension has been rejected, granted in full or granted in part.

Submitting a response to the importer questionnaire

Responses to the importer questionnaire should be lodged by email listed on the cover page. In submitting the response to the importer questionnaire, you must answer all questions and include all attachments and spreadsheets.

Verification of the information that you supply

The committee may visit your company to verify the information your company provides. We will be in further contact with your company to negotiate a mutually convenient visit timeframe, if required.

For such a visit to run smoothly, the committee's representatives will need to speak with key company personnel, such as those responsible for imports, sales and company accounts. It would be appreciated if all relevant company records requested, including import documentation, sales information,

financial data and any working papers were made available to the committees' officers.

If the committee cannot gain access to the relevant documentation, it may not be able to use your cost and sales information and may have to rely on other information to establish export prices and assess the Icelandic industry's injury claims.

It is important that you fully understand the dumping and subsidisation inquiry process, and the role of the committee in carrying out the inquiry. To this end, the proposed visit to your company will be useful for us to explain in detail the inquiry procedures and related issues.

According to Article 26, second paragraph, of Regulation No. 351/1994 the Committee may request authorities to assist in obtaining information and to carry out the necessary checks and inspections, particularly among importers, traders, and producers in Iceland.

Important instructions for preparing your response

All questions in this importer questionnaire must be completed. If a question is not applicable to your situation, please answer the question with 'Not Applicable' and provide an explanation as to why.

All questions must be answered in English. An English translation must be provided for documents not originally in English. This requirement is based on the principle that the investigation is international in nature, and it is essential that all parties have the opportunity to review the case file. If you specifically wish to receive the questionnaire in Icelandic, please inform the Committee of this request as soon as possible. (see contact details on page 1 of this questionnaire).

Clearly identify all units of measurement (e.g. KG) and currencies (e.g. ISK or EUR) used. Apply the same units of measurement consistently throughout your response to the questionnaire.

Label all attachments to your response according to the section of the questionnaire it relates to.

The data must be created as spreadsheet files in Microsoft Excel.

If you have used formulas to complete spreadsheets, these formulas must be retained and not hard-coded.

You must retain all worksheets used in answering the questionnaire. Be prepared to provide these worksheets during the committee's verification of your data.

If you cannot present electronic data in the requested format, contact the committee as soon as possible.

Please be aware that, if at any stage during this inquiry you become aware that you have inadvertently received confidential information submitted by another party to this process (for example, via email), you have a responsibility to notify the committee, delete the information and refrain from using, sharing, or retaining the information in any way

Goods under consideration / Goods subject to Anti-dumping and Countervailing measures

The goods subject to anti-dumping and countervailing measures (the goods) according to The Customs Tariff, Annex I to the Icelandic Customs Legislations No 88/2005 are:

– *Silicon:*

2804.6100 – – *Containing by weight not less than 99.99 % of silicon 0*

2804.6900 – – *Other*

of all forms (i.e. lumps, granules, or powder) and sizes.

Section A

Company and supplier information

1. Please nominate a contact person within your company:
Name:
Position in the company:
Telephone:
E-mail address:
2. If you have appointed a representative, provide their contact details:
Name:
Address:
Telephone:
E-mail address:

In nominating a representative, you are granting authority to the committee to discuss matters relating to the case with the nominated representative, including your company's confidential information.
3. Provide the address of where your company's importation, sales and financial records are held.
4. What is the legal name of your business and ID number?
5. Does your company trade under a different name and/or brand? If yes, provide details.
6. Was your company ever known by a different legal and/or trading name? If yes, provide details.
7. What is the overall nature of your company's business? Include details of the products that your company imports and sells.
8. Does your company undertake all functions of the importation of the goods, including lodging the import declarations, paying importation costs (e.g. duties, broker's fees, port charges), transportation from the port of discharge? If no, please provide details of the other company and the importation functions undertaken by that company.
9. What is the role of your company in the Icelandic market for the goods? Include details of whether your company can be described as a trader, distributor, retailer or an end-user of the goods.
10. Complete the worksheet named 'A-10 Supplier information'.
 - This worksheet lists your suppliers and manufacturers (if different), their contact details and an estimation of the import volumes from each supplier of the goods over the period.

11. The committee may seek to visit your company to discuss the case and to verify the data submitted in your import questionnaire responses. Are there any dates that are unsuitable for this visit?

Section B

Imports & forward orders

1. After receiving **Part A** of the questionnaire, the committee will provide you with a full list of import declarations from the Icelandic Customs Import Database of the goods imported by your company during the period. Please review this spreadsheet and confirm whether this is a complete listing of the importation of the goods during the period according to your company's records.
 - If the import listing provided does not include all your importations of the goods over the period, or you have identified any other issues, please contact the committee as soon as possible.
2. Complete the worksheet named 'B-2 Cost to import and sell' in relation to the selected importations highlighted in the import listing provided to you in question B.1 above.
 - This worksheet lists the cost to import and sell of selected importations of the goods.
 - Please provide the costs excluding VAT.
 - You must provide this list in electronic format using the template provided.
 - If you have used formulas to complete this worksheet, these formulas must be retained.
3. Complete the worksheet named 'B-3 Forward Orders'.
 - This worksheet lists your current forward orders of the goods.
 - You must provide this list in electronic format using the template provided.
4. Provide details on the products that you sell that contains the goods.

Section C

Further company and import information

1. Is your company part of a group (e.g. parent company with subsidiaries, common ownership, joint ventures)? If yes, provide:
 - (a) A diagram showing the complete ownership structure; and
 - (b) A list of all related companies and its functions
2. Is your company or parent company publicly listed?
If yes, please provide:
 - (a) The stock exchange where it is listed; and
 - (b) Any principal shareholders¹
If no, please provide:
 - (a) A list of all principal shareholders and the shareholding percentages.
3. Provide your company's internal organisation chart.
4. Describe the functions performed by each group within the organisation.
5. Does your company produce brochures, pamphlets or other promotional material? If yes, please provide them.
6. Are your financial accounts audited? If yes, who is the auditor?
7. What is the name of your financial accounting system?
8. Do you have an electronic system to track your sales and generate invoices? If yes, what is the name of this sales system?
9. Do you have an electronic system to track your costs of imports? If yes, what is the name of this costing system?
10. If your financial accounting, sales and costing systems are different, how do the systems interact? Is it electronically or manual? Please provide a detailed explanation and include diagrams.
11. Do your accounting practices differ in any way from the generally accepted accounting principles in Iceland? If yes, please provide details.
12. Have there been any changes to your accounting practices and/or policies over the last two years? If yes, please provide details.
13. Please provide the two most recently completed annual reports and/or financial statements for your company.

¹ Principal shareholders are those who can cast, or control the casting of, 5% or more of the maximum number of votes that could be cast at a general meeting of your company.

14. If the financial statements for your company are unaudited, provide for each company:
- (a) the tax returns relating to the same period; and
 - (b) reconciliation of the revenue, cost of goods sold, and net profit before tax between the financial statements and tax returns.
15. Does your company maintain different profit centres? If yes, provide profit & loss statements for the profit centre that the goods fall into for:
- (a) the most recent financial year; and
 - (b) the period.
16. If the period is different to your financial period, please provide:
- (a) Income statements directly from your accounting information system covering the most recent financial period and the period; or
 - (b) Quarterly or half yearly income statements directly from your accounting system covering the most recent financial period and the period.
17. Please provide a copy of your company's trial balance (in Excel) covering the period and the most recent financial year.
18. Please provide your company's chart of accounts (in Excel).
19. Provide details (and diagrams if appropriate) of the importation process of your company and representatives (e.g. agents) including:
- (a) Price determination and/or negotiation process
 - (b) Order placement process
 - (c) Order fulfilment process and lead time
 - (d) Delivery terms and process
 - (e) Invoicing process
 - (f) Payment terms and process
20. Do you purchase the goods in ISK? If not:
- (a) Do you pay your suppliers from a foreign currency denominated account? If yes, provide details
 - (b) Do you use forward contracts to lock in the foreign exchange rate on the purchases? If yes, provide details
 - (c) How is the exchange rate determined in your accounting system and how often is it updated?
21. Are there any suppliers of the goods related to your company? If yes, please provide a list of each related supplier and provide details on how the selling price is set.
22. If purchases of the goods made in accordance with price lists or price extras list, provide copies of these lists.
23. Did you receive on-invoice discounts and/or off-invoice rebates from any suppliers or associates of the suppliers in relation to the importation of the goods during the period? If yes, provide a description and explain the

terms and conditions that must be met to obtain the discount and/or rebate.

24. Were you given any credit or debit notes (directly or indirectly) from any suppliers or associates of the suppliers in relation to the importation of the goods during the period? If yes, provide details of the credit/debit notes including the reasons the credit/debit notes were issued.
25. Is your company provided compensation or reimbursement for any of the costs associated with the importation of the goods from your supplier? If yes, provide details describing the operation of the compensation or reimbursement arrangements and relevant supporting documentation.
26. In relation to the selected importations highlighted in the full import listing provided in question B.2, provide the following documentation:
- Contracts
 - Purchase order and order confirmation
 - Commercial invoice and packing list
 - Proof of payment to your supplier and the relevant accounts payable ledger
 - Bill of lading
 - Documents showing any bank charges
 - Invoices for all importation expenses, including:
 - Import broker's fees
 - Import duties
 - Port handling charges
 - Inland transport expenses from the port
 - Invoices for ocean freight & marine insurance (if applicable, for example where purchases are made on an ex-works or free-on-board basis)
 - Invoices for all exportation expenses, such as inland transport and port handling charges (if applicable, for example where purchases are made on an ex-works basis)
 - Country of origin certificates (if applicable)

Section D

Icelandic Market

Products in the Icelandic market

1. Generally, describe the range of the goods offered for sale in the Icelandic market. Your description could include information about:
 - quality differences
 - price differences
 - supply/availability differences
 - technical support differences
 - product segmentation.
2. Describe the end uses of the goods in the Icelandic market.
3. Describe the key product attributes that influence purchasing decisions or purchaser preferences in the Icelandic market. Rank these preferences or purchasing influences in order of importance.
4. What are the key differences between domestically produced goods and imported goods? How do these factors impact your purchasing decision?
5. How easily can you change suppliers? Provide a description of factors that may cause a re-evaluation of your supply arrangements and how you would implement such a change.
6. Please identify if there are any commercially significant market substitutes in the market for the goods in Iceland.
7. Have there been any changes in market or consumer preferences for the goods in Iceland in the last five years? Do you anticipate any change in preference in the coming five years? If yes, provide details including any relevant research or commentary on the industry/sector that supports your response.

Prevailing conditions of competition in the Icelandic market

1. In respect of the Icelandic market for the goods and the prevailing conditions of competition within the market:
 - (a) Provide an overall description of the market for the goods in Iceland which explains its main characteristics and trends over the past five years.
 - (b) Provide the sources of demand for the goods in Iceland, including the categories of customers, users or consumers of the product.
 - (c) Provide your estimate of the proportion (%) of the market that each of those sources of demand listed in (b) represents.
 - (d) Describe the factors that influence demand for the goods in Iceland, such as seasonal fluctuations, factors contributing to overall market growth or decline, government regulation, and

developments in technology affecting either demand or production.

- (e) Describe any market segmentations in Iceland; such as geographic or product segmentations.
 - (f) Provide your estimate of the proportion (%) of the market that each of the market segments listed in (e) represents.
 - (g) Describe the way in which Icelandic manufactured and other imported goods compete in the Icelandic market.
 - (h) Describe any other factors that are relevant to characteristics or influences on the market for the goods in Iceland.
2. Describe any entry restrictions for new participants into the market for the goods in Iceland. Your response could include information on:
- patents and copyrights;
 - licenses;
 - barriers to entry;
 - import restrictions; and
 - government regulations (including the effect of those government regulations).

In responding to this question ensure that relevant regulations are referenced.

Future demand, supply and other anticipated changes in the market

1. Do you anticipate any changes in patterns of supply and demand for the goods in the Icelandic market over the next 5 years?
2. What do you consider to be primary economic indicators that correlate with the demand for the goods and may provide some indication of likely future demand?
3. If any of your supply arrangements with your supplier/s of silicon metal are subject to contracts, identify all contracts that are likely to be renegotiated or revised in the next 1 to 5 years. Provide details on the annual volume or quantity of silicon metal supplied in accordance with each contract.

Section E

Importers' declaration

☐ I hereby declare that _____[company] certifies that the information contained in this submission is complete and correct to the best of my knowledge and belief.

Name :

Signature :

Position in
Company :

Date :