



Domestic Producer Questionnaire

Case number: 1/2025

Product: *Silicon metal*

From: The People's Republic of China

Inquiry period: 1 January 2022 – 30 June 2025

Section	Response due by
A	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 seeking further information from the Icelandic industry for the goods to inform its:

- understanding of the dynamics of the Icelandic market, including factors that may be impacting the economic condition of the Icelandic industry producing the goods; and
- to better assess the impact of anti-dumping measures applying to the goods, whether they are likely to lead to continuation of the dumping and subsidisation and the material injury that the anti-dumping measures are intended to prevent.

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.

Extension requests

If you require a longer period to complete all or parts of your response to this Domestic producer 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 domestic producer questionnaire

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

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.

A.1. – Company information

1. Provide details of any other business names you use to manufacture/produce/sell the goods that are the subject of this inquiry.
2. Provide your company's internal organisational chart. Describe the functions performed by each group within organisation.
3. List the major shareholders of your company. Provide the shareholding percentages for joint owners and/or major shareholders.
4. If your company is a subsidiary of another company list the major shareholders of that company.
5. If your parent company is a subsidiary of another company, list the major shareholders of that company.
6. Provide an outline of diagram showing major associated or affiliated companies and your company's place within that structure (include the ID. number of each company).
7. Are any management fees/corporate allocations charged to your company by your parent or related company?
8. Identify and provide details of any relationship you have with an exporter to Iceland or Icelandic importer of goods.
9. Provide a copy of the two most recent annual reports (if relevant). Also provide copies of relevant brochures or pamphlets on your business activities.
10. Provide details of any relevant industry association.

A.2 – The Imported and Locally Produced Goods

1. Fully describe your product(s) that are "like" to the imported product:
 - Include physical, technical or other properties.
 - List this information for each make and model in the range.
 - Supply technical documentation where appropriate.
 - Indicate which of your product types or models are comparable to each of the imported product types or models. If appropriate, the comparison can be done in a table.
2. Provide a summary and a diagram of your production process.
3. If your product is manufactured from both Icelandic and imported inputs:
 - describe the use of the imported inputs; and
 - identify that at least one substantial process of manufacture occurs in Iceland (for example by reference to value added, complexity of process or investment in capital).

A.3 – The Icelandic market

Product 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 from all sources.
3. Describe the different sales channels you supply the goods (for example, retail, wholesale, direct installation etc) and types of customers in each sales channel.
4. 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.
5. Describe the process by which your customers select your goods and the key factors that informed that decision.
6. What are the key differences between locally made goods and imported goods? How do these factors impact the purchasing decisions of your customers?
7. How easily can your customers change suppliers? Provide a description of factors that may cause re-evaluation of your supply arrangements.
8. Identify if there are any commercially significant market substitutes in the market for the goods in Iceland.
9. 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 in the industry/sector that supports your response.

Prevailing conditions in the Icelandic market

1. In respect of the Icelandic market for the goods and the prevailing conditions of competition within in 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 categories of customers, users or consumers of 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 consumption/demand 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 the ways that goods are marketed and distributed in the Icelandic market.
 - i. Describe any other factors that are relevant to characteristics or influences on the market for the goods in Iceland.
2. Describe the commercially significant market participants in the market for the goods in Iceland at each level of trade over the inquiry period. Include in your description:
 - names of the participants;
 - the level of trade for each market participant (e.g. manufacturer, reseller, original equipment manufacturer (EOM), end-user etc.);
 - a description of the degree of integration (either vertical or horizontal) for each market participant; and
 - an estimate of the market share of each participant.
3. Identify the names of commercially significant importers in the market for the goods in Iceland over the investigation period and estimate their market share. Specify the country each importer imports from and their level of trade in the Icelandic market, if known.
4. 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;
- imports restrictions; and
- government regulations (including the effect of those government regulations)

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

5. Do you anticipate any changes in patterns of supply and demand in the Icelandic market over the next 1 to 5 years? What are your expectations for your own sales/purchases of the goods over the period? Provide any relevant commentary to support your answers.

Relationship between price and cost in Iceland

1. Is your organisation/business entity the price leader of the goods in the Icelandic market? If no, please explain the reasons behind your response and specify the name(s) of the price leaders.
2. Describe the nature of your pricing for the goods (e.g. market penetration, inventory clearance, product positioning, price taker, price-maker, etc.) and your price strategies (e.g. competition-based pricing, cost-plus pricing, dynamic pricing, price skimming, value pricing, penetration pricing, bundle pricing, etc.) in Iceland. If there are multiple strategies for different products, please specify these. Provide copies of internal documents which support the nature of your product pricing.
3. How frequently are your Icelandic selling prices reviewed? Describe the process of price review and the factors that initiate and contribute to a review.
4. Rank the following factors listed in the table below in terms of their influence on your pricing decisions in the Icelandic market, with the most important factor ranked first and the least important factor ranked last. Other factors not listed can be added to the table if considered of importance.

Factors	Ranking
Competitors 'prices	
Purchase price of raw materials	
Cost to make and sell the goods	
Level of inventory	
Value of the order	
Volume of the order	
Value of forward orders	
Volume of forward orders	
Customer relationship management	

Supplier relationship management	
Desired profit	
Brand attributes	
Other (please define and add to table)	

A.4 – Company sales

1. Please complete appendix A4.1 (sales) listing all sales made in the domestic market within the period.
 - If any of the customers listed at appendix A4.1 (sales) are associated with your business, provide details of the association. Describe the price effect of the association. For example, is there preferential pricing for related parties?
2. Please identify in appendix A4.1 (sales) any transactions that are:
 - internal transfers; or
 - sales of like goods that you have not produced, for example if you have imported the product or on-sold purchases from another Icelandic manufacturer or importer.
3. Attach a copy of distributor or agency agreements/contracts.
4. Provide copies of any price lists.
5. If any price reductions (e.g. commissions, discounts, rebates, allowances and credit notes) have been made on your Icelandic sales of like goods provide a description and explain the terms and conditions that must be met by the customer to qualify.
 - Where the reduction is not identified on the sales invoice, explain how you calculated the amounts shown in appendix A4.1 (sales).
 - If you have issued credit notes (directly or indirectly) provide details if the credited amount has **not** been reported appendix A4.1 (sales) as a discount or rebate.
6. Please complete a appendix A4.2 (export sales) listing all export sales within the period.
 - If any of the customers listed at appendix A4.2 (export sales) are associated with your business, provide details of the association. Describe the price effect of the association. For example, is there preferential pricing for related parties?
7. Please identify in appendix A4.2 (export sales) any transactions that are:
 - internal transfers; or
 - sales of like goods that you have not produced, for example if you have imported the product or on-sold purchases from another Icelandic manufacturer or importer.
8. Attach a copy of distributor or agency agreements/contracts.
9. Provide copies of any price lists.

10. If any price reductions (e.g. commissions, discounts, rebates, allowances and credit notes) have been made on your Icelandic sales of like goods provide a description and explain the terms and conditions that must be met by the customer to qualify.
- Where the reduction is not identified on the sales invoice, explain how you calculated the amounts shown in appendix A4.2 (export sales).
 - If you have issued credit notes (directly or indirectly) provide details if the credited amount has **not** been reported appendix A4.2 (export sales) as a discount or rebate.

Projects and additional services

11. Do you offer additional services alongside sales of the goods (e.g., assembly or installation services)? If yes, provide details about:
- a. The different types of services offered
 - b. What activities are involved in the delivery of each service
 - c. The percentage of domestic sales where associated sales are provided
 - d. The factors that influence the price of each associated service

A.5 – General accounting/administration information

1. Specify your accounting period.
2. Provide details of the address(es) where your financial and production records are held.
3. Please provide the following financial documents for the most recent completed financial years plus any subsequent statements:
 - Chart of accounts;
 - Audited consolidated and unconsolidated financial statements (including all footnotes and the auditor's opinion);
 - Internal financial statements, income statements (profit and loss reports), or management accounts, that are prepared and maintained in the normal course of business for the goods.

These documents should relate to:

- a. The division or section(s) of your business responsible for the production and sale of the goods covered by the investigation, and
 - b. The company overall.
3. Describe your accounting methodology, where applicable, for:
 - the recognition/timing of income, and the impact of discounts, rebates, sales returns warranty claims and intercompany transfers
 - provisions for bad and doubtful debts
 - the accounting treatment of general expenses and/or interest and the extent to which these are allocated to the cost of goods
 - costing methods – standard or actual costs (e.g. by tonnes, units, revenue, activity, direct costs etc.) and allocation of costs shared with the other goods or processes
 - the method of valuation for inventories of raw material, work-in-process, and finished goods (e.g. FIFO, weighted average cost)
 - valuation methods for scrap, by-products, or joint products
 - valuation methods for damaged or sub-standard goods generated at the various stages of production
 - valuation and revaluation of fixed assets
 - average useful life for each class of production equipment, the depreciation method and depreciation rate used for each
 - treatment of foreign exchange gains and losses arising from transactions and from the translation of balance sheet items
 - restructuring costs, costs of plant closure, expenses for idle equipment and/or plant shutdowns
 4. If the accounting methods used by your company have changed over the period covered by the inquiry please provide an explanation of the changes, the date of change, and the reasons.

A.6 – Cost information

1. Complete appendices A6.1 and A6.2 (cost to make) for domestic sales and export sales.
2. Please complete appendix A6.3 (SG&A list) for domestic selling general and administration expenses.

A.7 – Other Factors, Upwards sales and costs reconciliation

1. Please complete appendix A7 (other factors).
2. Please complete the reconciliation templates for appendix A7.1 upwards sales.
3. Please complete the reconciliation templates for appendix A7.2 upwards costs.

A.8 – Injury Claims

1. Please provide any additional information (not already provided in your application) or elaborate on your application claims, addressing the likelihood of material injury occurring to the Icelandic industry if anti-dumping measures are not taken.
2. Discuss factors other than dumped imports that may have caused injury to the industry. This may be relevant to the inquiry in that an industry weakened by other events may be more susceptible to injury from dumping.

Responses should be made as accurately and as comprehensively as possible. Supporting evidence should be attached wherever possible. It will not be sufficient to simply assert that the measure should remain in force.

A.9 – Domestic producer's 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 :