



Scope Review: Application form

When you have completed this form, indicate the **confidentiality** of this document by placing an X in the relevant box below:

- 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 should be returned to the TRA using the [Trade Remedies Service](#)



Contents

Instructions	3
SECTION A: General Information	6
SECTION B: Evidence for Variation in Scope of a Measure.....	8
SECTION C: Declaration.....	11

Instructions

About us

The Trade Remedies Authority (TRA) is an arm's length body of the UK's Department for International Trade. It carries out trade remedies investigations to find out if a new trade measure may be needed to counter dumped or subsidised imports or a sudden surge in imports.

The legislative framework that the TRA operates under is found in the [Taxation \(Cross-border Trade\) Act 2018](#) ('the Act') and the [Trade Remedies \(Dumping and Subsidisation\) \(EU Exit\) Regulations 2019](#) ('the Regulations').

About you

You can apply for us to open a scope review if you have evidence that in relation to a current measure:

- other products are being imported under similar circumstances which may need to be covered by the measure, or
- there are products covered which may need to be removed from the description of the goods covered by the measure

You must provide sufficient evidence to support the initiation of a scope review as outlined by [Regulation 74 of the Trade Remedies \(Dumping and Subsidisation\) \(EU Exit\) Regulations 2019](#). More information on how we determine eligibility can be found in our [guidance](#).

You can find out more about our remit and how we work by reading our guidance on [trade remedies investigations](#).

About this form

Complete this form if you want to apply for a scope review of a measure. This form will give us the information we need to decide whether to initiate a review. You can find more information on how we [assess applications](#) in our guidance.

You must submit your application online through the [Trade Remedies Service](#). When you submit a confidential application, you must also submit a non-confidential version which doesn't contain any data you think is sensitive, as we are required to publish a copy of the application form. You can find out more about [what can be considered confidential and how to prepare a non-confidential version of your documents](#) in our guidance.

If you are considering submitting an application for a scope review and would like to discuss it beforehand, please email contact@traderemedies.gov.uk. You can find



more on completing this application in our [Pre-Application Office](#) and [application assessment](#) guidance.

If you have any issues or queries about using the Trade Remedies Service, please email help@traderemedies.gov.uk.

How to complete this application form

Please read and follow all the instructions carefully. You will need to provide evidence to support your concerns. You may need to attach supporting documents in appendices to supplement the answers you give.

Please also note the following points:

- Try to avoid leaving any questions blank. If the question isn't relevant to you, please try to explain why.
- If the answer to a question is "zero", "no", "none" or "not applicable", please write this rather than leaving the answer blank.
- If you feel you can't present the information as requested, please contact the Pre-Application Office by emailing contact@traderemedies.gov.uk.
- If there is not enough space in any part of the application form to provide a full answer, please attach appendices. Please ensure that any attachments are given a corresponding appendix reference in the title of the document and that these are referenced in the boxes provided.
- If you include any documents not in English, please provide an English translation.
- Provide all dates in the format DD/MM/YYYY (e.g. 23/05/2019).
- For all numerical figures, where appropriate please express every third number with a comma (e.g. '1,300' for one-thousand three hundred, '1,300,000' for one million and three-hundred thousand).
- Limit all sales/currency/income figures to two decimal places and use the appropriate currency symbol (e.g. £1,300.00).
- All figures should be reported net of tax unless otherwise stated.
- For definitions of the incoterms used throughout this document, please visit the [International Chamber of Commerce](#).

What happens next

Once you have completed this application form you can share a confidential version with the Pre-Application Office to get feedback before you formally submit your application. When you formally submit your application, you will need to submit a



confidential and a non-confidential version of this form. Please upload these through our [Trade Remedies Service](#).

Once you have done this:

- you will receive an email confirming the documents have been uploaded successfully;
- the assessor(s) of your application will contact you if further information is required; and
- the assessor(s) of your application may contact you to arrange a visit to verify the information contained in your responses.



SECTION A: General Information

A1. Current trade remedy measure

1. Provide the case number and name for the current trade remedy measure that this application applies to.

Case: 0157

Trade measure: 'Taxation notice 2020/37: countervailing duty on continuous filament glass fibre products originating in Egypt' (in particular 'mats made of glass fibre filaments excluding mats of glass wool')

Appendix reference:

A2. Applicant details

1. Give the name, address, email and telephone number of a contact person who can be contacted about this application.

Name: [redacted – contains personal information]

Position: Managing Director

Legal name of Company: GRP Solutions Ltd

Address: 2500 Blueprint, Portfield Road, Portsmouth, PO3 5FJ

Email: [redacted – contains personal information]

Telephone No: [redacted – contains personal information]

Mobile No: [redacted – contains personal information]

Name: [redacted – contains personal information]

Position: Management Accountant

Legal name of Company: GRP Solutions Ltd

Address: 2500 Blueprint, Portfield Road, Portsmouth, PO3 5FJ

Email: [redacted – contains personal information]

Telephone No: [redacted – contains personal information]

Mobile No: [redacted – contains personal information]

Appendix reference:

2. If you have appointed an external representative to assist with your application, please provide a letter of authorisation giving their name, business name, address, telephone number and email. Include below whether or not we can liaise directly with your representative.



Not applicable

Appendix reference:



SECTION B: Evidence for variation in scope of a measure

B1. Evidence to justify why the scope of a measure should be varied

1. In the box below, please give evidence to justify why you believe the scope of the measure described in Section A should be varied. Clearly detail what you believe the variation should be.

Examples of situations where the scope of a measure could be varied include:

- if goods which were not considered in the original investigation are or could be subject to the measure
- if a subsection of goods within the original scope are no longer produced in the UK.

This request is for a scope review of 'Taxation notice 2020/37: countervailing duty on continuous filament glass fibre products originating in Egypt,' specifically regarding commodity code 7019140090. We request the revocation of this measure, starting from 30/01/2021, in respect of commodity code 7019140090 .

Our request is grounded in the fact that 'Trade remedies notice 2023/02: countervailing duty on certain continuous filament glass fibre products originating in the People's Republic of China' revoked the countervailing duty on commodity code 7019140090 (previously 7019310000) for goods imported into the UK from China, effective from 30/01/2021 on the basis that there is no UK production of those goods.

Consequently, imports of commodity 7019140090 from Egypt are subject to a countervailing duty of 13.1%, while the same commodity imported from the People's Republic of China incurs no countervailing duty.

This situation defies logic because the implementation of 'Taxation notice 2020/37' was due to the ownership of the company [redacted – commercially sensitive information]' by [redacted – commercially sensitive information]' and thus [redacted – commercially sensitive information]' would be indirectly benefiting from Chinese state subsidy. 'Taxation notice 2020/37' acted as an extension of 'Taxation notice 2020/08' which was originally raised by the EU to protect European manufacturers from Chinese subsidies.

Logic dictates that if 'Taxation notice 2020/08' has been revoked in respect of commodity code 7019140090, 'Taxation notice 2020/37' should be too.



We are the largest distributor of composite materials in the UK, and our [redacted – commercially sensitive information] largest product line in terms of sales is commodity 7019140090. Our competitors are currently benefiting from the absence of countervailing duty on their imports of commodity 7019140090 from China, which has put us at a disadvantage in terms of cost competitiveness. We are massively concerned that if this situation persists, [the impact on market share has been redacted for reasons of commercial sensitivity]

In terms of financial impact, our annual import of 7019140090 from Egypt amounts to approximately [commercially sensitive data: non-confidential range: £1,000,000 – £3,000,000], currently incurring [commercially sensitive data: non-confidential range: £131,000 – £393,000] (13.1%) in countervailing duty.

Appendix reference:

2. Provide evidence that this change in circumstances is of a lasting nature. This should include how long this change has been occurring and the extent it is likely to continue.

The changes in circumstances are indefinite due to there being no UK manufacturer of commodity code 7019140090 as determined in the 'Trade remedies notice 2023/02: countervailing duty on certain continuous filament glass fibre products originating in the People's Republic of China' - the impact of any foreign subsidy on this commodity in the UK market has already been assessed in the review. Specifically in the Final Decision of the PRC investigation at para 18 under section B2 states :

“Mats are not produced in the UK, and there are no plans for domestic production of mats in the foreseeable future.”

The same verdict can be applied to the measure in respect of imports from Egypt.

Duty measures are in place to protect and enhance the competitiveness of UK businesses. However, the measures outlined in 'Taxation notice 2020/37', relating to commodity code 7019140090, is only adversely affecting GRP Solutions Ltd and making a UK business less competitive.

Appendix reference:

3. If you knew of any of the evidence you've provided to justify this change of scope during a previous review of this measure but did not submit it at the time, please explain why.

Not applicable



Appendix reference:

- 4. If a previous scope review application has been made regarding this measure, explain how this application differs.

Not applicable

Appendix reference:

B2. Reasoning on why the variation does not require a separate dumping or subsidy investigation

- 1. Provide evidence and explain why you consider this variation in scope does not require a separate investigation.

There is currently no injury occurring to any UK business other than that to GRP Solutions Ltd. If the measure was revoked, there would be no injury to UK business. The issues underpinning the decision that there are no UK producers have already been investigated and reported in the recent investigation so do not require another investigation.

Specifically, the Final Decision in the recent PRC investigation states, at paragraph 18 under section B2, as follows:

“The TRA has also considered scope in relation to mats. We determined that the description of the goods to which the measure applies should be varied to exclude mats. Mats are not produced in the UK, and there are no plans for domestic production of mats in the foreseeable future. In providing comments on the Statement of Essential Facts (SEF), EGF UK and Composites UK have commented that mats should remain within the scope of the measure. Further details about the SEF responses are set out in C3.4 Statement of Essential Facts (SEF).. The potential impacts of this removal have been considered, and in considering how alike the goods are, no areas of interchangeability between mats and the GFR goods produced in the UK have been found. The TRA has therefore concluded that mats are not able to replace any of the goods made by the UK industry in any area of the market”

Appendix reference:



SECTION C: Declaration

The information contained in this application:

1. Provides evidence that the scope of a measure should be varied;
2. Provides evidence that this variation does not justify a separate dumping or subsidy investigation; and
3. Is accurate and complete.

This information is required in line with [Paragraph 74 of the Trade Remedies \(Dumping and Subsidisation\) \(EU Exit\) Regulations 2019](#).

Name:	[redacted – contains personal information]
Company/Association:	GRP Solutions Ltd
Position:	Management Accountant
Company Registration number (if applicable):	09626126
Date:	26/05/2023
Signature:	<u>X C. Li</u>

