Trade Remedies Authority

Registration form for interested parties and contributors

Case SG0094: Safeguards Investigation on imports of Poly(ethylene) Terephthalate into the UK

Period of Investigation (POI):	01 January 2021 to 31 December 2025
Deadline for response:	19 August 2026
Contact details:	SG0094@traderemedies.gov.uk
Completed on behalf of:	Duy Tan Plastic Recycling Corporation

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:

☐ Confidential
☐☒ Non-confidential (will be made available on the public file)

Please note that you will have to provide a **confidential** and a **non-confidential version** of this registration form. Both copies must be returned to the TRA using the Trade Remedies Service by **19 August 2026**.

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.

An interested party is either:

a) a government of the foreign countries or territories subject to the investigation;
b) an overseas exporter, an overseas producer or an importer of the goods subject to the investigation;
c) a UK producer of goods that are like or directly competitive with the goods subject to the investigation; or
d) a trade or business association representing one or more of the parties under (b) and (c).

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

Scope of the investigation

The goods subject to investigation (Goods Concerned) are:

> *Poly(ethylene Terephthalate) resin, whether virgin produced poly(ethylene terephthalate) ("vPET") having a viscosity number of 74 ml/g or higher or recycled poly(ethylene terephthalate) ("rPET") of the same viscosity range.*

For further details, please refer to the Notice of Initiation on the public file.

Completing this form

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, or in exceptional circumstances, a statement of reasons why the information could not be meaningfully summarised.

Both copies must be returned to the TRA by **19 August 2026** using the Trade Remedies Service (www.trade-remedies.service.gov.uk). If information is not supplied in a reasonable time, then the TRA will be free to make determinations on the basis of facts available.

The non-confidential version of your registration form may be placed on the public file.

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 accordingly and only used for this investigation (except in limited circumstance as permitted by regulation 17 of the *Trade Remedies (Increase in Imports Causing Serious Injury to UK Producers) (EU Exit) Regulations 2019)* and will be stored in protected systems. The non-confidential version of your submission will be placed on the public file.

Request to complete a detailed questionnaire

If, on the basis of the information provided in this form, we may request further information up to and including a full questionnaire, if a party submits import/export data which significantly contradicts official UK customs data.

If your company is requested to complete a full questionnaire, you will be asked to respond to the questions in the detailed questionnaire and to support the TRA in authenticating your responses. This may involve the TRA conducting a remote authentication meeting.

In failing to do so, your company may be deemed not to have cooperated in the investigation. In the absence of cooperation, the TRA will base its findings on facts available. This may result in an outcome that is less favourable to your company than if it had cooperated.

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

Section A: About your company

A1. Contact and company information

1. Please complete the table below, ensuring that the point of contact has given the authority to provide this information:

Name (point of contact):	[redacted – contains personal information]
Address:	Lot D2, Duc Hoa Plastics Industrial Clusters, Duc Hoa Commune, Tay Ninh Province, Vietnam
Email:	info@duytanrecycling.com
Website:	https://duytanrecycling.com/en/

If you are representing a company, please fill in the information below:

Legal name of the organisation:	Duy Tan Plastic Recycling Corporation
Other operating names:	Duy Tan Recycling (DTR)
Legal structure (e.g., limited company, sole trader, state-owned etc):	Joint Stock Company
Location of company's primary activities (country):	Lot D2, Duc Hoa Plastics Industrial Clusters, Duc Hoa Commune, Tay Ninh Province, Vietnam
Countries you operate in:	Vietnam
Year of establishment:	2005
Position in the organisation:	General Director

2. Please explain your interest in this investigation.

Response: DTR is a Vietnamese company that manufactures and directly exports the goods subject to the investigation to the UK. The goods exported by DTR consist entirely of recycled polyethylene terephthalate resin (rPET).

3. Indicate whether your company is a member of any representative organisations (e.g. a trade body or chamber of commerce). If so, please specify.

Response: DTR is a member of Vietnam Plastic Association (VPA).

A2. Your company's activities

1. To determine your company's role for the purpose of this investigation, please select **the most applicable** option for your company. Please refer to the period of investigation (POI) defined on page 1.

Overseas producers and exporters

☒ [A2.1] During the POI, we both produced **and** directly/indirectly exported the goods concerned to the UK.
Note: Please complete sections A3, A4, and B.

☐ [A2.2] During the POI, we produced the goods concerned, but did not export to the UK.
Note: Please complete sections A3 and B.

☐ [A2.3] During the POI, we directly/indirectly exported the goods concerned to the UK, but did not produce the goods concerned.
Note: Please complete sections A4 and B.

UK producers and importers

☐ [A2.4] During the POI, we produced goods that are like the goods concerned in the UK **and** imported the goods concerned to the UK.
Note: Please complete sections A5, A6, and B.

☐ [A2.5] During the POI, we produced goods that are like the goods concerned in the UK (i.e. the UK like goods), but we did not import the goods concerned or like goods.
Note: Please complete sections A5 and B.

☐ [A2.6] During the POI, we imported the goods concerned to the UK, but we did not produce the goods that are like the goods concerned (the UK like goods).
Note: Please complete sections A6 and B.

Other

☐ [A2.7] Other.
Note: Please complete section B.

2. 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.

Response: DTR is a member of the Vietnam Plastic Association ("VPA"). The decision issued by the VPA approving DTR's admission as a member is provided in Exhibit 1.

A3. Production and domestic sales of the goods concerned

Complete this section if you indicated under **A2** that **you are a producer of the goods concerned.**

1. 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.

Response: DTR produces recycled polyethylene terephthalate ("rPET") resin grades, having an intrinsic viscosity number of 0.74 dl/g or higher.

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

[Index 100]	01/01/2021 – 31/12/2021	01/01/2022 – 31/12/2022	01/01/2023 – 31/12/2023	01/01/2024 – 31/12/2024	01/01/2025 – 31/12/2025
Volume	100	403	749	1,289	1,322
Capacity	100	140	256	463	463

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our guidance.

3. Please give details of all associated parties involved with the company 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
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]

+Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with our guidance.

4. If you do not export the goods concerned to the UK either directly or via associated parties, please describe how your products are exported to the UK (e.g. via unrelated wholesalers).

Response: DTR exports the goods concerned [redacted – commercially sensitive information].

5. Please provide the total of your domestic sales volumes and sales values of the goods concerned produced by your company during the POI (01/01/2025 to 31/12/2025) in the table below.

Domestic sales	01/01/2021 – 31/12/2021	01/01/2022 – 31/12/2022	01/01/2023 – 31/12/2023	01/01/2024 – 31/12/2024	01/01/2025 – 31/12/2025
Volume [Index 100]	100	443	665	1,077	1,025
Value [Index 100]	100	545	797	1,219	1,129

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our guidance.

6. 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.

Response: DTR [redacted – commercially sensitive information].

7. 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 (the UK like goods)?

Response: DTR is [redacted – commercially sensitive information].

8. Please provide any details of other goods you produce and/or sell for the UK market, other than the goods concerned.

Response: In addition to recycled rPET plastic pellets, DTR also exports [redacted – commercially sensitive information].

A4. Direct and indirect exports of the goods concerned

Complete this section if you indicated under **A2** that **you are an exporter of the goods concerned**.

1. 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)
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]

+Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with our guidance.

2. 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 company), are to be considered indirect exports. Please provide the values on a CIF basis.

Direct exports		
Commodity Code	Export volume (POI) [tonnes]	Export value (POI) [£]
3907 6100	[redacted – commercially sensitive information, non-confidential range: 5,000 tonnes to 7,000 tonnes]	[redacted – commercially sensitive information, non-confidential range: £5,500,000 to £ 7,500,000]
3907 6900	[redacted – commercially sensitive information, non-confidential range: 0 to 10 tonnes]	[redacted – commercially sensitive information, non-confidential range: £0 to £1,500]

Indirect exports		
Commodity Code	Export volume (POI) [tonnes]	Export value (POI) [£]
3907 6100	[redacted – commercially sensitive information concerning export channels]	[redacted – commercially sensitive information concerning export channels]
3907 6900	[redacted – commercially sensitive information concerning export channels]	[redacted – commercially sensitive information concerning export channels]

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our guidance.

3. If your exports have not been made on a CIF basis, please explain the basis on which they have been reported.

Response: DTR's export transactions of its products to the UK during the POI were [redacted – commercially sensitive information]. In order to comply with the requirements of the questionnaire (which requests prices on a CIF basis), DTR has [redacted – commercially sensitive information]

4. Of your total PET exports to the UK during the POI, please state the share attributable to virgin produced PET, and recycled PET.

Response: During the POI, [redacted – commercially sensitive information].

5. 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
[Not Applicable]	[Not Applicable]	[Not Applicable]	[Not Applicable]

+Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with our guidance.

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

Complete this section if you indicated under **A2** that **you are a producer in the United Kingdom of goods that are like the goods concerned** (the UK like goods).

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

Response: Not Applicable

2. Please provide your company's total production volumes and production capacity for UK production of goods that are like the goods concerned (the UK like goods) during the POI in the table below.

[Tonnes]	01/01/2021 – 31/12/2021	01/01/2022 – 31/12/2022	01/01/2023 – 31/12/2023	01/01/2024 – 31/12/2024	01/01/2025 – 31/12/2025
Volume	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Capacity	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our guidance.

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

Domestic sales	01/01/2021 – 31/12/2021	01/01/2022 – 31/12/2022	01/01/2023 – 31/12/2023	01/01/2024 – 31/12/2024	01/01/2025 – 31/12/2025
Volume [tonnes]	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Value [£]	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable

Export sales	01/01/2021 – 31/12/2021	01/01/2022 – 31/12/2022	01/01/2023 – 31/12/2023	01/01/2024 – 31/12/2024	01/01/2025 – 31/12/2025
Volume [tonnes]	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Value [£]	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our guidance.

4. 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 that are like the goods concerned (the UK like goods)? If yes, please provide details of these fluctuations.

Response: Not Applicable

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

Response: Not Applicable

A6. UK imports of the goods concerned

Complete this section if you indicated under **A2** that **you are an importer of the goods concerned**.

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

Response: Not Applicable

2. Please provide the total of your import volumes and import values of the goods concerned to the UK during the POI in the table below. Provide the values on a CIF basis.

Total Imports	01/01/2021 – 31/12/2021	01/01/2022 – 31/12/2022	01/01/2023 – 31/12/2023	01/01/2024 – 31/12/2024	01/01/2025 – 31/12/2025
Volume [tonnes]					
3907 6100	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
3907 6900	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
Value [£]					
3907 6100	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable
3907 6900	Not Applicable	Not Applicable	Not Applicable	Not Applicable	Not Applicable

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our guidance.

3. If your imports have not been reported on a CIF basis, please explain the basis on which they have been reported.

Response: Not Applicable

4. Of your total PET imports to the UK during the POI, please state the share attributable to virgin produced PET and recycled PET.

Response: Not Applicable

5. Please provide details for your suppliers of the goods concerned in the table below.

Company name	Company location (city, country)	Activities (producer, trader, etc.)	Relationship
Not Applicable	Not Applicable	Not Applicable	Not Applicable

+Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with our guidance.

6. Please specify your purpose in importing the goods concerned. Select all of the following options that are applicable to your company.
   - ☐ 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 goods to third countries, namely____
- ☐ Other.

7. "If you selected "other", please specify your purpose for importing the goods concerned in the field below.

Response: Not Applicable

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

Response: Not Applicable

9. Please specify whether and how your company is related to any exporters, overseas producers or UK companies involved in the production of the goods.

Response: Not Applicable

Economic Interest Test

10. Please provide all physical addresses (including postcode) of all your company's UK sites/facilities involved in the importation of PET. Please specify the number of full-time equivalents (FTE) for each of your company's UK sites or facilities.

Response: Not Applicable

11. Please comment on how these employment figures would be affected if a safeguard measure was imposed.

Response: Not Applicable

12. How would your domestic sales of PET be affected if a safeguard measure was imposed?

Response: Not Applicable

13. How significant are the imports of PET relative to your company's overall volume of imports?

Response: Not Applicable

14. Please describe how you would expect restrictions on imports of PET to affect each of the following. Where possible, please support your claims with evidence.
    - Domestic prices of PET in the UK
    - Total UK production of PET
    - Total imports of PET
    - Total exports of PET

Response: Not Applicable

15. Do you know of any related industries that would be affected if a safeguard measure was imposed? Please consider in particular:
    - Upstream industries – those who produce inputs (such as raw materials) needed for the production of PET;
    - Downstream industries – those who purchase PET; and

- Industries for substitute goods – those which might be bought instead of PET.

Response: Not Applicable

16. To what extent would you expect any changes in prices of PET to be passed onto final consumers?

Response: Not Applicable

17. Would your plans for investment or expansion in the UK over the next five years be affected if a safeguard measure was imposed? Please support your claims with evidence.

Response: Not Applicable

18. How would a safeguard measure in the PET market affect the number or range of suppliers, their ability to differentiate products by price, quality, service, or innovation, and their ability to set agreed prices between themselves or for certain consumers or products?

Response: Not Applicable

19. How would the cost of switching between suppliers in the PET market be affected if a safeguard measure was imposed? Please provide an explanation.

Response: Not Applicable

20. If a safeguard measure was imposed, how would it affect the product choices available to consumers and the ability of downstream businesses or consumers to make informed decisions? Please provide an explanation.

Response: Not Applicable

21. Are there any additional economic factors that you consider to be relevant for the Economic Interest Test in this investigation?

Response: Not Applicable

22. As a public body, the TRA has an obligation under the Equality Act 2010 to ensure that the possible effects of its activities on different people are considered. This public sector Equality Duty covers the following protected characteristics:
    - age
    - disability
    - gender reassignment
    - marriage or civil partnership
    - pregnancy and maternity
    - race
    - religion or belief
    - sex
    - sexual orientation

Please provide any relevant information about whether the imposition of a safeguard measure might disproportionately affect any of these groups or any other particular group.

Response: Not Applicable

Section B: Additional information

B1. Other known companies

We need contact information in order to notify all other known companies who may be interested in taking part in the investigation and making their views known.

B1.1 Exporters, importers, and UK producers

1. Please provide contact details of any other known exporters and importers of the goods concerned and UK producers of the goods that are like the goods concerned (the UK like goods) or directly competitive with the goods concerned (UK directly competitive goods) in the table below.

Activities (exporter / importer / UK producer	Company name	Contact details (email)	Location(s) (if info is available)

+Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with our guidance.

B1.2 Upstream and downstream companies

1. Please provide contact details for UK companies from whom you purchase materials used to make the like goods (upstream companies) and UK companies who purchase the like goods from you (downstream companies) to help us obtain a more complete picture of the potential effects of a measure.

   You are not obligated to provide this information but we will use any details you provide to get in touch with these companies and improve our understanding of the impacts of any potential measure.

Activities (upstream / downstream)	Company name	Contact details (email)	Location(s) (if info is available)
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – contains personal information]	[redacted – commercially sensitive information]

+Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with our guidance.

B1.3 Any other companies

1. Please provide a list of any other known companies, including the nature of their company and any associations with other companies.

   This may include, for example, companies that are involved in the importation, distribution, or sale of goods that are like the goods concerned from third countries.

Response: Not Applicable

B2. Goods

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

Response: DTR respectfully requests the TRA to exclude rPET from the scope of the present investigation.

DTR submits that in addition to the fact that the applicant does not produce rPET, the latter product is fundamentally different from vPET in terms of technical characteristics, functionality, pricing and consumer perception as well as uses.

First, rPET is fundamentally different from vPET in terms of input materials, production processes and consequently also prices and market dynamics:
- Input materials: DTR's rPET – and rPET in general -- is produced from 100% post-consumer PET waste as feedstock. In DTR's case this feedstock is collected locally. In contrast, vPET is manufactured with petrochemical raw materials.
- Production Processes: rPET production involves complex processes for impurity removal and odor elimination to meet food-grade standards set by the Food Standards Agency ("FSA") and Food Standards Scotland ("FSS"), requiring advanced technology and rigorous quality control.
- Technical characteristics and functionality - although rPET may have similar viscosity as vPET, its mechanical and chemical properties can vary due to the recycled input materials.

Second, the above-mentioned factors, i.e., the stated high cost of collecting post-consumer PET waste and the complex production process required to meet eco-friendly product standards, result in a significant cost difference with the selling price of rPET approximately 45%-50% higher than that of vPET.[2]

Third, the applicant's broad claim of functional and commercial interchangeability between rPET and vPET is not entirely correct. The applicant acknowledges in the application that there are physical differences between vPET and rPET in terms of colour, transparency and the ability to process rPET due to metal contamination (see section 6 of the application). These differences termed as 'minor' by the applicant intrinsically limit substitutability of rPET with vPET and limit the end-use of and consumer perception towards rPET. Indeed, rPET is not suitable for all applications and presentations (on account of, among others, the color and contaminants). Furthermore, the higher price of rPET limits interchangeability as price sensitive users cannot substitute the less expensive vPET with the much higher priced rPET.

[2] According to ICIS Insight, the spread between rPET and virgin PET prices in Europe during 2024 reached levels not seen since at least 2020, reflecting a substantial premium (see: ICIS Explore). ICIS tracking further shows that, by Q4 2024, food-grade rPET was trading roughly €600/tonne above vPET, implying an approximate 45–50% price premium over vPET (see: Recycling Today).

Fourth, as explained in response to question B.4, the environmental benefits of rPET, coupled with the higher production costs and prices of rPET, position it in a distinct, sustainability-driven market segment, not in competition with low-price vPET imports.

Indeed, the applicant also concedes that the UK PET market is segmented and rPET and vPET markets are distinct.

Moreover, the possible imposition of safeguard measures on rPET is not justified and would also run contrary to the UK's economic interests considering especially that the UK rPET producers did not (i) cooperate in TS0060; (ii) request the present safeguard measures, and (iii) request any specific protection against imports. Thus, while the applicant does not produce rPET, the actual rPET producers have not claimed injury on account of increased imports.

DTR recalls that the WTO Appellate Body has repeatedly underlined that because SG measures are "emergency actions", when construing the prerequisites for taking such actions, their extraordinary nature must be taken into account.[3]

Overall, rPET should not be included in the scope of the present safeguard investigation for the reasons noted above. DTR also will file a separate submission with further details seeking the exclusion of rPET from the investigation and possible measures.

In addition, and without prejudice to the above, DTR submits that the TRA should undertake a separate and segmented analysis for rPET and vPET, and the conditions for the imposition of SG measures should be assessed separately and individually for each of these PET types.

2. Indicate in the box below any physical, commercial or functional differences between the goods concerned and the goods that are like or directly competitive with the goods concerned.

Response: DTR refers to the comments above.

B3. Investigation

1. Can you comment on the allegations of increased quantities of imports of the goods concerned to the UK during the POI.

Response: DTR respectfully considers that, in taking into account the alleged increase in imports of PET, it is important for the TRA to consider the fact that PET imports from Vietnam have declined by almost 25% between 2024-the POI. Hence, PET imports from Vietnam (i) did not enter the UK in significantly or greatly increased quantities in the most recent period, (ii) were not sudden enough, and sharp enough, quantitatively and qualitatively, and (iii) recent enough, so as to warrant a SG investigation or measures.

[3] Appellate Body Report, *Argentina – Footwear (EC)*, para. 94; *US – Steel Safeguards*, para. 347.

2. Aside from the alleged increased quantity of imports of the goods concerned to the UK, please provide any details of any other factors that could have resulted in the alleged serious injury to the UK producers of the goods, for example:
   - Contraction in demand or changes in patterns of consumption;
   - Restrictive trade practices of, and competition between, third country and UK producers;
   - Environmental regulations and commitments;
   - Developments in technology; and
   - Export performance and the productivity of the UK.

Response: DTR reserves its right to comment on this aspect in the course of the investigation.

3. Please provide comments on any aspect(s) of the investigation that you think pertinent as part of the case team's assessment. Specifically, you may wish to comment on:
   - The UK and / or global market for the goods concerned; and
   - The impact of any potential safeguard measure upon the UK market including prices for the goods concerned, and for future exports of the goods concerned to the UK.

Response: DTR reserves its right to comment on this aspect in the course of the investigation.

B4. Other comments

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

Response: As mentioned above, DTR requests that rPET be kindly excluded from the scope of the investigation and any possible measures. Imposition of safeguard measures on rPET and that too as requested by the applicant will be contrary to the UK's environmental goals and significantly impact downstream consumers.

rPET production in general and that of DTR in particular, is closely aligned with the UK Government's circular economy and environmental objectives. The UK has established a Circular Economy Taskforce[4] to support the transition towards a circular economy, with a particular focus on resource efficiency, recycling, waste reduction and accelerating the transition to Net Zero. In addition, the UK Plastic Packaging Tax[5] provides a direct economic incentive for businesses to use recycled plastic, with plastic packaging containing at least 30% recycled plastic being exempt from the tax. These policies demonstrate the UK's clear policy direction towards increasing the use of recycled plastics and promoting recycling and circularity.

By using 100% post-consumer PET waste, rPET significantly lowers environmental impact, diverts waste from landfills and oceans, and generates 79% fewer carbon emissions than vPET.[6]

[4] https://www.gov.uk/government/groups/circular-economy-taskforce
[5] https://www.gov.uk/green-taxes-and-reliefs
[6] https://petrecyclingteam.com/en/excellent-co2-balance

These environmental benefits, coupled with the higher production costs of rPET, position it in a distinct, sustainability-driven market segment, not in competition with low-price vPET imports.

DTR does not produce vPET resin. DTR exclusively produces 100% post-consumer recycled rPET, serving end-users committed to sustainability goals. Thus, the rPET imports from DTR contribute to global environmental goals without impacting the UK's PET resin industry.

Consider redacting this information in your non-confidential version of this form, in accordance with our guidance.