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:	Alpla UK Limited

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]
Address:	Unit 9 Yew Tree Way, Stonecross Business Park, Golborne, WA3 3JD, UK
Email:	[redacted]
Website:	www.alpla.com

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

Legal name of the organisation:	Alpla UK Limited
Other operating names:	
Legal structure (e.g., limited company, sole trader, state-owned etc):	Limited company
Location of company's primary activities (country):	United Kingdom
Countries you operate in:	United Kingdom
Year of establishment:	1990
Position in the organisation:	UK Business Manager

2. Please explain your interest in this investigation.

We are a manufacturer of products made from PET

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.

BPF, The Packaging Federation

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.

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.

Please answer here

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.

[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					
Capacity					

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

+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).

Please answer here

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 [tonnes]					
Value [£]					

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.

Please answer here

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)?

Please answer here

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

Please answer here

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)

+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		
3907 6900		

Indirect exports		
Commodity Code	Export volume (POI) [tonnes]	Export value (POI) [£]
3907 6100		
3907 6900		

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.

Please answer here

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

Please answer here

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

+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).

Please answer here

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					
Capacity					

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]					
Value [£]					

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]					
Value [£]					

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.

Please answer here

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)?

Please answer here

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.

Please answer here

2. Please provide the total of your <u>import volumes</u> and <u>import values</u> 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	6437.14	12,559.54	12,463.81	12,275.01	18,778.37
3907 6900	0	0	0	0	0
Value [£]					
3907 6100					
3907 6900	0	0	0	0	0

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.

Incoterms vary dependent upon supplier and we do not have a full breakdown of pricing. We are not happy to share confidential information on our costs, so those fields remain blank.

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

21% vPET and 79% rPET

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
[redacted]	[redacted]	[redacted]	[redacted]

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[redacted]		[redacted]		[redacted]	[redacted]

+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 bottles and preforms (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.

Please answer here

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

Almost identical

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.

Our parent company owns 3 of our suppliers, from whom we import rPET, and various independent suppliers

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.

890 FTE

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

Potential loss of business affecting up to 97 employees

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

Potential loss of business if competitors are cheaper

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

Roughly 74% of our resin imports during the 5-year period were PET or rPET

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

I would expect that domestic prices of PET in the UK would eventually increase as demand begins to outstrip supply.
Since PET production in the UK would require enormous investment and a great deal of time to implement, I would not expect any increase in UK production within the next few years.
I would expect imports of PET to fall initially if import duties became more expensive, but as demand for UK product increased, I would expect import levels to have to increase to keep pace with the overall demand.

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.

We are a convertor of PET, producing preforms and bottles. Other industries in the field would also be affected. This would particularly affect the beverages sector.

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

I would expect any changes to be implemented in our final pricing, but since our price mechanism tracks ICIS and Platts indices for Europe, it would be hard to push through any great changes for the UK market specifically.

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.

No

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?

This may result in reduced options for supply as more businesses try to focus on UK sourced product. There is only one UK manufacturer of PET.

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.

Price increases would be necessary to recover increased raw material costs. Quality may be reduced. This may affect availability of food grade material

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.

On the assumption that UK supply could not meet UK demand, we would expect that we would still need to import PET to meet our needs. From our point of view as a packaging producer, increased tariffs would further reduce profit margins for our customers, who are facing increasing difficulty in passing on increases to the large supermarket chains. This could affect the viability of some smaller producers who are already under pressure through other factors, potentially reducing consumer choice. *If increases are accepted by the supermarkets, consumers could be hit with price increases at the till. If demand and supply are not balanced, availability of consumer goods could be impacted, resulting in shortages*

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

Geopolitical volatility may impact availability of raw materials for UK PET production. Sustainability targets may be affected if rPET is included in the safeguarding plan. If our customers consider the increased cost of UK Plastic Packaging Tax outweighs the saving of using a 30% rPET content, they may switch to 100% vPET. This could further increase demand for UK PET. Our customers currently prefer imported rPET due to its superior clarity when compared to our previous UK rPET manufacturer

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.

No relevance

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)

+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.

A number of our customers agree PET pricing directly with manufacturers on soft or hard-tolled agreements. This removes us from the decision-making process on source of supply. I would need their permission before sharing details directly.

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.

No suggestion

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.

No comment

B3. Investigation

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

There seems to be a slight shift, mainly due to soft-tolled or hard-tolled agreements made directly by our customers. Our main supply of PET in 2025 was from the UK, with approx. 75% currently coming from the UK. In 2023, the split was 80% from the UK and 20% import.

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.

UK Plastics Packaging Tax, implemented in 2022, has seen increased taxation on packaging products containing less than 30% PCR for supply within the UK. This has increased our usage of PCR, lessening the percentage of PET in our production. Similarly, the EU's Single Use Plastics Directive has required an inclusion of 25% rPET in plastic beverage bottles since 2025, increasing to 30% in 2030.

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.

If demand can meet supply, the impact could be minimal. However, I am not sure that this is the case. We have experienced force majeures with suppliers in the past and, should this happen in the UK, there is the possibility of having to pay much increased pricing due to unavailability from the UK manufacturer.

B4. Other comments

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

Please answer here

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