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:	Faerch Group

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
X 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

Trade Remedies Authority

Registration form

☐ Confidential

X Non-confidential

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:	Faerch UK Ltd 78 Lancaster Way Business Park Ely Cambridgeshire CB6 3NW United Kingdom
Email:	[redacted]
Website:	https://www.faerch.com

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

Legal name of the organisation:	Faerch A/S
Other operating names:	Faerch London Ltd. Faerch Durham Ltd.
Legal structure (e.g., limited company, sole trader, state-owned etc):	Limited company
Location of company's primary activities (country):	Faerch A/S: Denmark Faerch London Ltd. & Faerch Durham Ltd.: UK
Countries you operate in:	EU, UK, USA
Year of establishment:	Faerch A/S (1989) Faerch London Ltd. (1988) Faerch Durham Ltd (2011)
Position in the organisation:	[redacted]

2. Please explain your interest in this investigation.

Faerch is a producer of food packaging products made from PET in the UK. The products are made with vPET or rPET inputs e.g. flakes, pellets or granulates, which is then extruded and thermoformed before the PET Trays are shipped to our customers for use. Faerch imports rPET and Virgin PET from different countries outside of the UK to enable production. In addition to food packaging manufacture, Faerch also operates a PET Recycling site in Duiven NL. From that site, Faerch exports rPET products to the UK.

Our interest in the investigation links to the negative impact a potential tariff on Virgin PET and Recycled PET would have on our business as the cost of our operations would increase, and potentially cost UK jobs.

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.

Members of

- *BPF (manufacturers)*
- *BPF Recycling Group*
- *Recoup*
- *WRAP UK Packaging Pact*
- *INCPEN*
- *OPRL*

A2. Your company's activities

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

Overseas producers and exporters

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

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

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

UK producers and importers

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

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

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

Other

☐ [A2.7] Other.
Note: Please complete <u>section B</u>.

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.

- *BPF (manufacturers) and BPF Recycling Group*
- *Recoup*
- *WRAP UK Packaging Pact*
- *INCPEN*
- *OPRL*

Trade Remedies Authority

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.

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.

Faerch imports both Virgin PET and recycled PET for our products in the UK.

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 higher than IV 0,78	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
3907 6900 lower than IV 0,78	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Value [£]					
3907 6100	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
3907 6900	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]

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.

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

[redacted]

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
CIRREC Netherlands B.V.	Duiven, Netherland	Producer	Part of Faerch Group
Supplier 1	Germany	Producer	Supplier
Supplier 2	Netherland	Producer	Supplier
Supplier 3	Germany	Producer	Supplier
Supplier 4	Taiwan	Producer	Supplier
Supplier 5	Multiple	Producer	Supplier
+ more			

+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.
   - X We use the goods as input in our production of PET Food Packaging (rigid thermoformed pots, tubs, trays, cups, lids)
   - ☐ 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.

Import to produce food packaging

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

Quality: UK rPET is of a lower quality when compared to import material. We see a greater level of impurities in some UK material, and this can impact production quality, specifically impacting food packaging integrity. Volume: UK PET and rPET volumes are insufficient to meet our business demands. Circularity: rPET imported from within the Faerch Group (Cirrec) is made from post-consumer PET trays, which we make back into food packaging again. This supports the circular economy in two ways: 1) It gives post-consumer trays a second life and diverts them from incineration, and 2) it reduces the thermoforming industry's reliance on bottle-grade rPET, leaving this for bottlers to use, in order to reduce their own carbon footprint. Importantly, tray-rPET is not available in the UK. Business security: It is inadvisable for businesses to have a single source of supply for critical materials, for contingency reasons. Best practice is to have at minimum dual or 3-point supply, so that if there is an incident at one site (fire, flood, closure, etc), supply is ensured. It is important to diversify procurement in order to maintain leverage to improve quality and processes.

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.

CIRREC Netherlands B.V belongs to Faerch Group as indicated above. The other are conventional 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.

Faerch Durham Ltd. *Damson Way* *Durham, DH1 2YN* *United Kingdom* *Company no: 07770672* *FTE 175 - 250* *Faerch London Ltd.* *Waymark House* *19A Cedar Road* *Sutton, Surrey SM2 5DA* *United Kingdom* *Company no: 02291152* *FTE 175 - 250*

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

If a safeguard is implemented it would be more attractive to produce the PET food packaging at one of our other production sites in EU and export to UK. It would have significant negative impact on number of FTE on the two facilities in the UK.

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

Our customers would likely pass the cost on to the end consumer – exacerbating food price inflation.

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

We have 3 production sites in the UK; two producing PET food packaging and one producing PP food packaging. [redacted]

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

Due to the short deadline and the holiday period, we have not had time to provide evidence, but would be happy to do so during follow up to this initial investigation, if requested with a more realistic timescale.

Price:

- There is currently insufficient rPET/vPET volume produced in the UK to meet demand, therefore restrictions to imported PET would certainly push up the price of domestic rPET/vPET – perhaps to unattainable levels due to limited availability. *Evidence: Look at what is happening with PRNs at the moment – limited availability, very high pricing, government proposing an Regulatory Position Statement.*

Domestic PET production

- **rPET:** Whilst an increase in rPET price is one factor (of many) in making the market more favourable for domestic recycling infrastructure investment this *is subject to producers not simply switching out of PET altogether*, as recycling factories require a secure feedstock supply. Infrastructure development takes time (consider 5-10 years) – and investors in domestic PET recycling infrastructure must be supported (e.g. grants, funding, gate fees, essential industry recognition, etc.)
- The PET price increase significantly increases the risk of rPET fraud and strategies to circumvent the measure; loopholes include: Importing processed PET instead of PET resin / flake, e.g. PET which has already been converted into sheet, or thermoformed packaging, thereby avoiding the trade restriction whilst still importing.
- **vPET:** An increase in domestic PET production is very unlikely. Not only is it relatively expensive to run a business in the UK (energy, employment etc) PET manufacture is dependent on imported raw materials which have shown increased volatility in recent years.

Imports:

- **Material split:** Imports of PET would come down as people switch to other materials to avoid the trade restriction and higher pricing. So whilst PET imports would reduce, imports of other plastics would increase accordingly.
- **Manufacture abroad:** Imports of PET resin/flake would come down as businesses opt to manufacture abroad – imports of processed PET (sheet and finished goods) would increase. This is at the expense of UK manufacture.
- **Virgin PET:** We do not expect virgin PET imports to reduce (see above) except by material switching and moving manufacture abroad, as above.

Exports:

- We do not expect UK to export any significant volume of PET or rPET as
    1. UK already has insufficient capacity to meet its own market demands
    2. Politically, EU favours “made in EU”
    3. UK produced rPET is likely to be higher in price vs other markets, due to high costs of business in UK and lack of common market inhibiting exports
    4. There would be a glut of cheap rPET out there looking for a market (i.e. the rPET UK used to buy but is now restricted)

Consequences:

- It is unlikely that investors would build a vPET resin plant or rPET recycling plant in UK as a result of this measure because customers are more likely to simply switch materials away from PET and into imported virgin PP or other plastics which are not under the scope of this safeguarding measure.
- Due to PET's high recycled content, a material switch would significantly increase CO2e emissions, increasing climate change.
- Alternatively, producers would simply import ready-made PET products instead of PET resin, which puts UK converters out of business, and reduces supply chain visibility and accountability.
- A trade measure which considers the import of only one material incentivises all other materials, with unintended consequences for sustainability.

UK Businesses like ourselves need a competitive and open market in order to secure availability, negotiate costs, and drive up quality and sourcing standards.

Whilst a carefully managed long-term plan of incentivising domestically produced material *could* be beneficial to UK industry, sovereignty and circularity, **the current proposal is not the right mechanism to achieve that.**

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.

Downstream companies would have to increase prices to offset tariffs. This on-cost would ultimately be passed to end consumer, exacerbating food inflation.

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

Pricing to end consumer is decided by FMCGs and Retailers not by packaging companies. However, we anticipate that the prices increases would be passed on to the final customers as no players in the value chain are able to fund the tariffs.

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.

Short-term, we would not change our investment strategy to offset the tariffs as price increases would be required.

Long-term Faerch has the ambition to increase circularity in PET packaging in Europe and the 'safeguard' measure would be included in the country sequencing, but other points are of higher importance e.g. access to feedstock, gate fees, energy cost etc.

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?

It would have limited impact outside of a price increases. For Virgin PET there is only 1 UK based supplier. This would therefore generate a monopoly for UK virgin material with reduced competition, and would impact future supply security. This would therefore increase the risk of supply for UK based food packaging production, and downstream food production as a result.

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.

Both rPET and Virgin PET are commodity grades with limited switching costs. However, for rPET there are quality differences, and currently, the rPET sourced in the UK is of significantly lower quality the most other European markets. This will reduce ability to move to UK supply for rPET material. This is also illustrated above in point no. 5 as none of our major suppliers of PET grades are based in the UK. Producers are likely to switch out of PET.

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.

Due to the anticipated material switch from PET and rPET into non-recycled materials (e.g. PP, PS, aluminium food trays), consumers will no longer have a choice to select more sustainable packaging made with recycled content

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

Safeguard measures on PET imports would not only have a cost impact on the food and beverage value chain of which Faerch Group is a part of, but also on much wider parts of the economy linked to PET like textiles and polyester as well pharmaceuticals, consumer goods and industrial packaging.

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.

The proposed safeguard will have no affect on this

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)
[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.

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]	[redacted]	[redacted]	

+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.

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.

The trade measure focusses solely on PET – both rPET and vPET, creating complete imbalance in the packaging material industry. A measure should consider all materials, or no materials, to prevent producers from simply shifting to materials not covered in this trade measure. It is important not to inadvertently incentivise use of virgin materials over recycled content, in order to avoid increased sustainability impact.

NB: There is an inconsistency in the goods concerned.

In the section '*Scope of the investigation'* page 2 it is stated that the investigation covers vPET and rPET with a viscosity number of 74 ml/g or higher.

However, the Commodity Code 3907 6900 is: <0,78 ml/g and 3907 6100 is: > 0,78 ml/g

Assume the safeguard is intended to cover viscosity numbers higher ***AND*** lower than 0,78 ml/g

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.

As stated above, the current quality of rPET sourced in UK is not at the same level as from our major EU suppliers. It simply contains too many contaminants like other polymer types, foreign bodies and/or too poor colour sorting. Consequently, short term we are unable to replace rPET quantities with UK sourced rPET.

B3. Investigation

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

Increased efforts to hit sustainability and recycled content targets limits producer's choices to PET as mechanical recycled PET is the only approved suitable technology to incorporate recycled plastic in food packaging. See EU regulation 2022/1616. Mechanical recycling PET is a well-known and mature process and as such we witness a switch from other difficult to recycling Food Contact Materials (PP, PS, cardboard, fiber etc) to PET.

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.

*Vast majority of our vPET and rPET are sourced within EU. If **quality, availability and cost** of local UK source materials where at the same level we would naturally pursue that option for our local production facilities.*

Perhaps one reason it is cheaper to import PET and rpet - rather than produce it domestically - is that PET produced abroad does not necessarily meet the same high standards as domestically produced PET and rpet. Imposing a mirror clause on PET exporters could close the gap in quality and support UK producers.

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.

Repeated from Q A6.14:

Consequences:

- It is unlikely that investors would build a vPET resin plant or rPET recycling plant in UK as a result of this measure because customers are more likely to simply switch materials away from PET and into imported virgin PP or other plastics which are not under the scope of this safeguarding measure.
- **Due to PET's high recycled content, a material switch would significantly increase CO2e emissions, increasing climate change.**
- Alternatively, producers would simply import ready-made PET products instead of PET resin, which puts UK converters out of business, and reduces supply chain visibility and accountability.
- A trade measure which considers the import of only one material incentivises all other materials, with unintended consequences for sustainability.

UK Businesses like ourselves need a competitive and open market in order to secure availability, negotiate costs, and drive up quality and sourcing standards.

Whilst a carefully managed long-term plan of incentivising domestically produced material *could* be beneficial to UK industry, sovereignty and circularity, **the current proposal is not the right mechanism to achieve that.**

NB: PET produced abroad often does not meet the same high standards as domestically produced PET and rPET. Imposing a mirror clause on PET exporters could close the gap in quality and support UK producers.

B4. Other comments

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

If needed, we would be happy to elaborate our position in an interview.

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