

Trade Remedies Authority
Premier House,
60 Caversham Road
Reading, RG1 7EB
United Kingdom

1 July 2026

By TRS
By email: ad0087@traderemedies.gov.uk

NON-CONFIDENTIAL

Dear Madam,
Dear Sir,

Subject: AD0087 (Glass Containers from China) — Submission of Huaxing Group on issues of injury, causation and economic interest

Our client: Guangdong Huaxing Glass Co., Ltd. and its related companies (Foshan Huaxing Glass Co., Ltd and Foshan City Can Shui Huaxing Glass Co., Ltd (together '*Huaxing Group*')

1. INTRODUCTION

1. On 5 March 2026,¹ the Trade Remedies Authority initiated the anti-dumping proceeding concerning imports of glass containers originating in the People's Republic of China (AD0087) (the '*Investigation*'), pursuant to paragraph 9 of Schedule 4 to the Taxation (Cross-border Trade) Act 2018 (the '*TCBTA*').²

2. The Investigation was initiated further to an Application lodged on 3 February 2026 by an anonymous applicant, on behalf of and supported by UK producers purporting to represent at least 25% of total UK production of the product concerned (the '*Applicant*').

¹ Notice of initiation – Glass containers originating in the People's Republic of China – Investigation into alleged dumping – Investigation no. AD0087 (the '*Notice of Initiation*'), available [here](#).

² Taxation (Cross-border Trade) Act 2018 (as amended), Schedule 4, paragraph 9, available [here](#).

3. The period of investigation in the Application covers the 12-month period from 1 July 2024 to 30 June 2025 (the '**Application POI**'), while the examination of trends relevant for the assessment of injury covers the period from 1 July 2021 to 30 June 2024 (the '**Application Injury Period**').³

4. The present submission is lodged on behalf of Guangdong Huaxing Glass Co., Ltd. and its related companies — namely, Foshan Huaxing Glass Co., Ltd and Foshan City Can Shui Huaxing Glass Co., Ltd ('**Huaxing Group**'). Huaxing Group is a leading Chinese exporting producer of the product under investigation and has been sampled as an 'overseas exporter' by the TRA for the purposes of making its findings in the Investigation.

5. Huaxing Group strongly contests the allegations outlined in the Application and submits that the Investigation must be terminated immediately — without the imposition of any anti-dumping measures with respect to China.

6. In particular, Huaxing Group submits that:

- the investigation should not have been initiated on the basis of paltry evidence, in particular evidence pertaining to the domestic industry, export prices, and undercutting which is unreliable and not meaningfully summarized;
- imports from China should be assessed separately from imports from Türkiye for the purpose of an injury determination because dumping and subsidisation are subject to separate legal requirements;
- the UK is not suffering injury from Chinese imports, and that the Applicant failed to account for detracting evidence including the exceptional nature of the UK market in the years 2021 and 2022, the significantly improved market share of the UK industry during the injury period, and the unique and complementary market need satisfied by imports of glass containers from China;

³ Application, at page 17.

- if injury does exist (*quod non*), the Applicant failed to establish the causal link, and evidence shows that injury is caused by confounding factors including the negative impact of environmental regulation, external shocks caused by energy and electricity prices, high levels of investment for the UK industry, declining demand for glass products, and imports from Türkiye; and
- the imposition of anti-dumping measures is not in the UK economic interest and would only exacerbate the cost of living crisis.

2. THE INVESTIGATION SHOULD NOT HAVE BEEN INITIATED ON FOOT OF THE WEAK AND LIMITED EVIDENCE PROVIDED IN THE APPLICATION — WHICH CANNOT SUBSEQUENTLY BE ‘CURED’ BY THE TRA USING ITS OWN FINDINGS

7. At the outset, the Huaxing Group wishes to respectfully remind the TRA that dumping investigations are initiated in compliance with UK law only where the Applicant provides ‘sufficient evidence’ of dumping, injury and causation.

8. As paragraph 9(1)(b) of Schedule 4 to the TCBTA makes clear, the exercise of the TRA’s discretion to initiate a dumping investigation is qualified by the requirement that the TRA is satisfied that the “*application contains sufficient evidence that...the goods have been or are being dumped in the United Kingdom and the dumping has caused or is causing injury to a UK industry in those goods*”.⁴ This is a mandatory requirement. While the TRA may subsequently conduct its own enquiries for the purposes of examining the accuracy and adequacy of the evidence provided in an application in accordance with its own obligation under regulation 52 of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulation 2019 (the ‘**Dumping and Subsidisation Regulations**’), this does not absolve an applicant of their own free-standing obligation to sufficiently substantiate their application in the first place.

9. Indeed, WTO law makes abundantly clear that a wholly deficient application from a domestic industry cannot subsequently be ‘cured’ by the findings of an investigating authority. Rather, no such investigation should be initiated in the first place. If an investigation is already initiated, this should be terminated immediately once it becomes clear that the evidence is insufficient. The investigating authority has no discretion to continue in this respect.

⁴ TCBTA, Schedule 4, paragraph 9(1)(b), available [here](#).

10. In particular, Article 5.8 of the WTO Anti-Dumping Agreement makes it clear that:⁵

“An application...shall be rejected and an investigation shall be terminated promptly as soon as the authorities concerned are satisfied that there is not sufficient evidence of either dumping or of injury to justify proceeding with the case.”

11. Huaxing Group notes with particular concern the allegations made by the Applicant with respect to imports of glass containers from China are entirely unsubstantiated by relevant evidence and, consequently, do not meet the requisite standard under either UK law or WTO law.

12. **First**, this is particularly the case given the clear failure on the part of the Applicant to demonstrate that it is representative of the UK industry.

13. In these circumstances, Huaxing Group submits that only very limited weight can reasonably be attributed to the information that has been provided in the Application. As evident in the non-confidential version of the Application, the identity of the Applicant is redacted as confidential information, alongside information relating to the Applicant's production volume/value during the Application POI — which it must be noted is completely redacted and is not provided in the form of ranges.

14. Absent any information regarding the Applicant itself, there is no way to ascertain whether the Application has been made “*by or on behalf of the UK industry*” within the meaning of regulation 52(2) of the Dumping and Subsidisation Regulations. Instead, the Application merely identifies various other UK producers in the ‘About Other Interested Parties’, whilst simultaneously redacting as confidential the field titled ‘Position regarding application’. Other than the boilerplate declaration that the Application has the support of UK industry provided at the end of the document,⁶ the Applicant itself offers no meaningful information — even framed in non-specific, generic terms — regarding the level of support among UK producers for the Application.

⁵ WTO Agreement on Implementation of Article VI of the General Agreement on Tariffs and Trade 1994 (the ‘**WTO Anti-Dumping Agreement**’).

⁶ Application, at page 62.

15. This approach is wholly inadequate to satisfy the standing requirements under UK law and WTO law — all the more so given the Applicant's position that it should be granted anonymity for the purposes of the Investigation, and that the positions of other known UK producers should also be entirely redacted as confidential. There is no evidence or information whatsoever provided to interested parties that the Application has been made by or on behalf of the UK industry, which is a legal requirement underpinning an important exercise of the TRA's statutory functions that is undoubtedly of wider public interest. The TRA's decision to grant confidential treatment for the identity of the Applicant in this regard cannot serve to unreasonably and disproportionately prevent interested parties from understanding whether the Application has been lawfully made and accepted under UK law.

16. In these circumstances, Huaxing Group respectfully submits that the Application cannot be asserted as having been made by or on behalf of the UK industry within the meaning of regulation 52(2) of the Dumping and Subsidisation Regulations, given the negligible amount of information disclosed to interested parties. Despite the Applicant's assertions, its standing remains — as far as Huaxing Group and other interested parties are concerned — entirely unsubstantiated.

17. Such an approach to the conduct of a dumping investigation places interested parties at a considerable disadvantage when it comes to understanding the evidence that has been provided by an applicant, in particular with respect to the questions of injury and causation. In short, given the lack of any certainty as to the representativeness of the Applicant, this in turn casts doubt as to the reliability and accuracy of the information with respect to the apparent impact of the allegedly dumped imports of glass containers from China. Trends for the various injury indicators are provided without any meaningful context, and are essentially presented in a vacuum.

18. **Second**, the Applicant's selective reliance on the official HMRC import data for supporting its allegations raises considerable doubts as to the 'accuracy' and 'adequacy' of the information that has been provided in the Application.

19. Curiously, the Applicant places clear reliance on the HMRC import statistics in order to support its allegations regarding the existence of a causal link between the situation of the UK industry and the impact of the allegedly dumped imports of glass containers from China insofar as import volumes are concerned. At the same time, the Applicant attempts to ‘cherry-pick’ with respect to the reliability of the official import statistics, asserting that this is “*unreliable particularly regarding ‘value’ data*”,⁷ simply because it claims to have obtained five *ad hoc* price quotes for various Chinese producers (one of which is entirely redacted in the non-confidential version of the Application) which appear to contradict the official import data.⁸

20. The Applicant’s explanation for why HMRC import statistics cannot be used to determine export price is absurd.⁹ The only ‘evidence’ provided by the Applicant as to why HMRC data cannot be used is that the data does not align with the Applicant’s selective prices. This is a tautology insofar as the Applicant believes that a series of online price quotes are a more authoritative source of data than official HMRC statistics. The Applicant suggests that the HMRC statistics are unreliable because they are “self-certified and not audited upon arrival”,¹⁰ and would thus have the TRA believe that the price of imports of glass containers from China is systematically overreported to such an extent so as to render those prices unusable. The Applicant evidently does not harbour the same concerns regarding the HMRC import prices pertaining glass containers from Türkiye, which it relied upon in the parallel Application for an anti-subsidy investigation.¹¹ Official government import statistics, which are typically a key source of information in trade remedy investigations, should not be impugned on the basis of such a flimsy assertion.

⁷ Application, at page 59.

⁸ Application, see Annexes E32 – E36. Note that Annex E32 is entirely withheld as confidential.

⁹ Application, at page 59.

¹⁰ Application, at page 59.

¹¹ See generally Application – Glass containers originating in Türkiye – Investigation into alleged subsidisation – Investigation no. AD0088, available [here](#) (*‘Türkiye Application’*).

21. What is much more likely the case is that the cherry-picked quotes provided by the Applicant are themselves unreliable. There are a number of important flaws in the evidence that the Applicant puts forward in this regard. Importantly, these ‘quotes’ have not been specifically provided by any Chinese producer in the context of a direct inquiry sent by the Applicant but have instead all been merely indicated to the world at large on the ‘Alibaba’ platform. It is well established that the publicly displayed prices on Alibaba are not actual prices, but are generally regarded as ‘clickbait’ or ‘window dressing’ designed to attract the attention of customers and encourage prospective customers to enter into negotiation with the seller — at which price concrete price quotations are exchanged. Moreover, the final price to be paid is also subject to a wider range of variables (e.g., customisation, logos, specific material colours, size, etc.).

22. The price quotes (at least those which have been made available to interested parties) also pertain solely to beer bottles and wine bottles.¹² Yet the product scope here applies to a much broader range of glass containers covering 15 tariff codes, several of which do not cover drink bottles. If the Applicant intends to cover such a broad range of goods in the product scope, it must at least provide evidence of dumping commensurate with that product scope.

23. In any event, Huaxing Group highlights that none of the price quotes provided by the Applicant have been provided by either of the two sampled Chinese overseas exporters — namely Huaxing Group and SPG Group — which together represent the largest exporters of glass containers to the UK during the Application POI. Huaxing has provided actual evidence of its export prices, which impugns the reliability of the price quotes included in the application.¹³ For example, for 750 ml wine bottles, Huaxing most recently sold at prices between **[CONFIDENTIAL: business sensitive information not susceptible of meaningful summary]** *per piece* – roughly **[CONFIDENTIAL: business sensitive information not susceptible of meaningful summary]** the price quoted in Appendix E35 for shipments between 10,000 and 100,000 pieces.¹⁴

¹² Application, at Appendices E33 – E36.

¹³ See **ANNEX 1 [CONFIDENTIAL]**.

¹⁴ See **ANNEX 1 [CONFIDENTIAL]**.

24. Given the minimal weight that can be attributed to the ‘price quotes’ provided by the Applicant in annexes E32 to E36 of the Application, the evidence put forward by the Applicant does not satisfy the relevant standard laid down in paragraph 9 of Schedule 4 TCBTA, *i.e.*, providing sufficient evidence that the glass containers from China are being injuriously dumped.¹⁵ Clearly, the Applicant’s allegations are directly contradicted by the official HMRC import statistics — which it must be pointed out are based on *actual* imports of the product under investigation to the UK market.

25. In other words, the most fundamental allegations underpinning the entirety of the Application — namely that the UK industry is suffering injury as a result of dumped imports from China — are based on information of an entirely speculative and unrepresentative nature. This clear deficiency in the Application renders it deficient under the rationale for the requirement under paragraph 9(1)(b) of Schedule 4 to the TCBTA that an application contains ‘sufficient evidence’ that the basic conditions may be met.¹⁶ UK law and WTO law both make abundantly clear that an investigation cannot be initiated in the presence of mere assertion by domestic industry.

26. **Third**, the methodology used by the Applicant to calculate the level of undercutting is indiscernible from the non-confidential Application, and thus does not permit Huaxing the ability to meaningfully comment on the level of undercutting alleged by the Applicant.¹⁷ As explained *supra*, the price quotes used by the Applicant to establish export price are unreliable and an inappropriate basis upon which to initiate an anti-dumping investigation. With that having been established, we stress also that the methodology used by the Applicant to determine the landed price of such exports is unclear and that the Applicant must provide a meaningful summary of this calculation pursuant to Regulation 45 of the Dumping and Subsidisation Regulations.¹⁸

27. In the Constructed normal value and injury Annex to the Application (the ‘**Injury Annex**’), the Applicant treats the following information as commercially sensitive:

¹⁵ We also note that certain several aspects of the Applicant’s injury analysis, such as the level of undercutting and the magnitude of dumping, are undermined by the Applicant’s use of an unsubstantiated export price value.

¹⁶ TCBTA, Schedule 4, paragraph 9(1)(b), available [here](#).

¹⁷ Application, at pages 57-58.

¹⁸ Available [here](#).

- the prices of each model of glass container which is supposedly available for purchase on Alibaba;
- the internet links from which those prices are determined (even though the links are presumably public information and included in Annexes E33 - E36);
- the weight of each glass container;
- shipping quotations used to establish price of ocean freight; and
- the sources used to determine shipping quotations.¹⁹

28. Unless the disclosure of this information would “*be of significant competitive advantage to a competitor*” of the Applicant or would have a “*significant adverse effect on*” the Applicant or its source of information, there is no basis for the Applicant to treat such information as confidential.²⁰ It is hard to imagine how the disclosure of, *e.g.*, shipping quotations from a public source could provide a significant advantage to a competitor of the Applicant or otherwise harm the Applicant. If the shipping quotations are from a non-public source, the Applicant should provide a non-confidential summary of the quotations (*i.e.*, by ranging the data) or at the very least indicate the nature of the source so that Huaxing can have a reasonably meaningful understanding of the calculations and the sources relied upon by the Applicant. This is particularly important as it pertains to the calculation of landed price, because landed price (not the ex-works prices which are the only information available to Huaxing) is pertinent to the question of whether or not the UK industry is harmed by imports from China. As demonstrated by Huaxing’s export prices, the gulf between FOB prices and CIF prices, which can be ascribed almost entirely to ocean freight, is significant.²¹ Indeed, in 2022 (the first year of the injury period), the CIF price for Huaxing’s exports was **[CONFIDENTIAL: business sensitive information not susceptible of meaningful summary]** that of the CIF price.²² This means that, during that year, ocean freight cost more than the actual good being sold by Huaxing. **[CONFIDENTIAL: business sensitive information not susceptible of meaningful summary]**.²³

¹⁹ Injury Annex, tab ‘Chinese quotes’.

²⁰ Dumping and Subsidisation Regulations, regulation 45(2), available [here](#).

²¹ See ANNEX 1, tab ‘FOB v. CIF’ **[CONFIDENTIAL]**.

²² ANNEX 1, tab ‘FOB v. CIF’ **[CONFIDENTIAL]**.

²³ ANNEX 1, tab ‘FOB v. CIF’ **[CONFIDENTIAL]**.

29. Thus, particularly towards the beginning of the injury period, the export prices provided by Huaxing underscore that ocean freight is likely to be a significant component of any undercutting calculation. Huaxing suspects that the undercutting calculation carried out by the Applicant fails to adequately reflect the significant cost of ocean freight for exports of glass containers, but again cannot meaningfully comment absent a reasonable non-confidential summary from the Applicant. The TRA should scrutinize closely these calculations and ensure that a non-confidential summary is provided pursuant to Regulation 45 of the Dumping and Subsidisation Regulations.

3. IMPORTS FROM CHINA MUST BE ASSESSED SEPARATELY FROM THOSE OF TÜRKİYE

30. Huaxing Group takes note of the statement provided by the Applicant in its response to Question 2 of the section entitled ‘Causal link between the imported goods and injury to your industry’ (the ‘**Causation Section**’) of the Application. In essence, this question relates to the identification of additional known/relevant factors — other than the allegedly dumped imports — and which are responsible for the injury (if any) of the UK industry.

31. In its response, the Applicant states as follows:²⁴

“In addition to the injury we believe the UK is suffering from Chinese imports, we also believe subsidised imports from Turkey have caused injury. An application has been submitted to the TRA to investigate this.”

32. Indeed, the Applicant refers to its application which led to the initiation of the separate AS0088 investigation — initiated on the same day as the present investigation — which is an anti-subsidy investigation concerning the product concerned exported from Türkiye to the UK.²⁵

33. In this regard, Huaxing Group wishes to draw the attention of the TRA to two important points from the perspective of the current investigation.

²⁴ Application, page 61.

²⁵ See generally Türkiye Application.

34. **First**, the Applicant's response is highly relevant to the TRA's assessment under paragraph 9 of Schedule 4 to the TCBTA as to whether the Applicant has provided 'sufficient evidence' that the allegedly dumped imports from China are causing injury to the UK industry. The determination of 'causation' within the meaning of UK law is not merely limited to the identification of a 'positive' causal relationship between the allegedly dumped imports and the situation of the relevant UK industry. Separately, regulation 35 of the Dumping and Subsidisation Regulations makes clear that the notion of 'causation' requires that injury caused by other known factors must not be attributed to the allegedly dumped imports. Clearly therefore, the requirement that an application for a dumping investigation must include 'sufficient evidence' of causation necessarily extends to requiring sufficient evidence that the injury in question is not caused by other factors.

35. The Application is utterly inadequate in this regard, providing no meaningful attempt to identify or distinguish between the effects of the allegedly dumped imports from China and the allegedly subsidised imports from Türkiye on the exact same situation of the UK industry. Indeed, with respect to the conditions of injury and causation, the two separate applications in AD0087 and AS0088 are essentially a mirror image of each other, and no evidence with respect to Turkish imports is even provided in support of the application in AD0087. Rather, the Applicant appears to be unreasonably seeking separate measures to remedy the exact same situation.

36. In such circumstances, it cannot reasonably be asserted that a wholesale copy/paste exercise of this nature satisfies the unambiguous legal standard established in paragraph 9 of Schedule 4 to the TCBTA. Quite simply, as is readily underlined by the one-size-fits all approach of the two applications in AD0087 and AS0088, the Applicant has failed to provide 'sufficient evidence' justifying the imposition of an anti-dumping investigation with respect to imports of glass containers from China.

37. **Second**, given that the two investigations are proceeding in parallel, Huaxing Group respectfully highlights that the investigations must at all times be treated as entirely separate.

38. In particular, Huaxing Group submits that this is a key consideration when assessing the impact of imports from China and Türkiye — which must be appropriately distinguished and should not be assessed together. To this end, it must be highlighted that the TRA enjoys no discretion to carry out a ‘mixed’ cumulative assessment, combining imports from a country subject to an anti-dumping investigation with imports of the same product subject to a parallel anti-subsidy investigation.

39. This is clear from the text of regulation 34 of the Dumping and Subsidisation Regulations, which provides for the possibility of a cumulated assessment where certain conditions are met. As regulation 34(2) stipulates, “*the TRA may cumulatively assess the effects of all the dumped goods or subsidised imports, **as the case may be***”.²⁶ In this context, the use of the terms ‘or’ and ‘as the case may be’ make clear that a cumulated assessment is only possible where the goods in question are subject to the same type of investigation. This is further evident throughout the text of regulation 34, which presents the terms ‘dumped imports’ and ‘subsidised imports’ as alternatives, with no combination of the two notions.

40. Consequently, Huaxing Group respectfully submits that the TRA must take due care when carrying out its investigation to carefully distinguish the impact of the allegedly subsidised imports from Türkiye from the impact of the allegedly dumped imports from China. Imports from each source must be assessed separately, within the context of the particular investigation to which each is subject. Further, the TRA should consider that the Application does not attempt to distinguish between the injury caused by Chinese imports and by Turkish imports. As we will establish further in the following sections, the Applicant’s failure to do so with regard to imports from Türkiye and with regard to other potential causes for injury leaves a gaping hole in its analysis of the cause of the harm to Union industry.

²⁶ Dumping and Subsidisation Regulations, regulation 34(2), available [here](#).

4. THE UK INDUSTRY IS NOT SUFFERING INJURY FROM CHINESE IMPORTS

41. The present investigation has been initiated on foot of an allegation by the Applicant that the UK industry is suffering injury as a result of the impact of the (allegedly) dumped imports from China. In this regard, Huaxing Group notes that the Applicant does not specifically identify the precise nature of the injury that it is allegedly suffering, and merely sets out indexed information relating to various economic indicators in the 'Injury' section of the non-confidential version of the Application. Instead, the nature of the alleged injury is identified by the TRA in the Notice of Initiation, which clarifies that this alleged injury to the UK industry has taken the form of "*reduced domestic sales volume, output (by volume), profits, and market share*", as well as "*undercutting*".²⁷

42. The notion of 'injury' is defined in paragraph 5 of Schedule 4 to the TCBTA as encompassing the separate concepts of 'material injury', 'threat of material injury', and 'material retardation of the establishment of the industry'.²⁸ Despite the lack of clarity provided by the Applicant in this regard, Huaxing Group understands that the allegation outlined in the Application to be one of (current) material injury to the UK industry.

43. Regulation 30 of the Dumping and Subsidisation Regulations provides guidance on the determination of injury in a dumping investigation, specifying that the TRA must consider:

- (a) the volume of the dumped goods or subsidised imports during the injury period;
- (b) the effect of the dumped goods or subsidised imports on prices of the like goods in the United Kingdom during the injury period;
- (c) the consequent impact of the dumped goods or subsidised imports on a UK industry during the injury period; and
- (d) any other factors it considers relevant.

²⁷ Notice of Initiation, page 2.

²⁸ TCBTA, Schedule 4, paragraph 5, available [here](#).

44. Moreover, according to the WTO Appellate Body, the examination of the existence of material injury requires an investigating authority to examine the impact of the subject imports on the domestic industry on the basis of “*all relevant economic factors and indices having a bearing on the state of the industry*”, which “*requires an examination of the 'explanatory force' of subject imports for the state of the domestic industry*”.²⁹

45. Huaxing Group submits that carrying out such an examination on the basis of the data provided in the Application quite readily indicates that the UK industry is not suffering *any* material injury within the meaning of regulation 30 of the Dumping and Subsidisation Regulations.

4.1. The exceptional nature of economic conditions in the years 2021 and 2022 presents a distorted picture of the situation of the UK industry

46. On a preliminary note, Huaxing Group wishes to remind the Applicant — as well as the TRA — that the selection of a reference period for the assessment of injury is predicated on the need for this to be capable of providing an accurate picture of the UK industry’s condition and the import trends at hand. In particular, in line with established WTO practice and as confirmed by the Panel in *EC – Tube or Pipe Fittings*, “*there must be a streamlined, genuine and undistorted picture drawn from the facts before the investigating authority*”.³⁰ As the Panel noted, the risk in failing to carefully define the period for the assessment of injury trends is that temporary or cyclical downturns in the domestic industry’s performance could (incorrectly) be taken to indicate a situation of material injury.

47. This is precisely the case in the present Investigation.

48. Huaxing Group highlights that by selecting 2021 as the base year for its analysis, the Applicant has in fact “*drawn a distorted picture from the facts*” before it, namely by mistakenly characterising the stabilisation of the UK industry’s condition from around the second half of 2022 and onwards as an indicator of material injury.

²⁹ See, WTO Appellate Body report, *Korea - Pneumatic Valves*, at para. 5.166.

³⁰ WTO Panel Report, *EC – Tube or Pipe Fittings*, at para. 7.316.

49. Yet, 2021 simply does not constitute a year of ‘normal’ market conditions and was instead a particularly exceptional year, given that it was defined by an unprecedented resurgence in economic activity following the easing of COVID-19 lockdown measures first introduced in 2020. Moreover, while the TRA has selected a slightly different period of investigation to that outlined in the Application (*i.e.*, beginning on 1 January 2022 rather than 1 July 2021),³¹ Huaxing Group respectfully submits that this does not adequately address the risk of a distorted injury analysis in the present investigation, given that the first part of 2022 has also been heavily affected by the post-COVID-19 economic resurgence.

50. This economic reality has been recognised and reflected in the practice of other investigating authorities. To this end, Huaxing Group highlights that the European Commission has expressly acknowledged the relevance of these exceptional economic conditions in recent investigations.

51. For example, in the recent expiry review in **Hot-Rolled Flat Steel Products (Brazil, Iran and Russia)**, the European Commission identified and acknowledged the risk that using 2021 as the starting point for the injury assessment could have a distortive impact on its findings. As the Commission explained, this context had to be properly taken into account when considering the situation of the Union industry:³²

“However, the indicators cannot be analysed without considering the exceptionally favourable steel market conditions of 2021 and the first half of 2022. In 2020, the pandemic-induced slowdown of industrial activity and its consequent decrease of steel demand led to a severe downturn of the performance of the steel industry, and global economy in general. In 2021, driven by a rebound in demand, steel consumption strongly bounced back at increased prices. These favourable market conditions were carried over to the first half of 2022. However, the positive post-Covid trend experienced throughout 2021 came to an end in the second quarter of 2022 due to severe rises in energy costs and high inflation.”

³¹ Notice of Initiation, page 2.

³² Commission Implementing Regulation (EU) 2023/2758 of 12 December 2023 imposing a definitive anti-dumping duty on imports of certain hot-rolled flat products of iron, non-alloy or other alloy steel originating in the Federative Republic of Brazil, the Islamic Republic of Iran and the Russian Federation following an expiry review pursuant to Article 11(2) of Regulation (EU) 2016/1036 of the European Parliament and of the Council, available [here](#), at recital 186.

52. Moreover, in **Softwood plywood (Brazil)**, the European Commission expressly acknowledged that the exceptional economic conditions caused by the post-COVID-19 economic resurgence were not confined only to 2021 and continued into the first half of 2022:³³

*“(194) As a first step, the Commission established a basic profit covering full costs under normal conditions of competition. It was not possible to establish a profit margin on the basis of any of the years immediately prior to the increase of the share of dumped imports from Brazil. **The years 2021 and 2022 were found to be heavily influenced by the post COVID-19 economic recovery and did not appear appropriate to set the target profit...**”*

53. Quite obviously, the unprecedented macroeconomic impact of the post-COVID-19 recovery in demand is similarly a highly relevant factor in the present context also. As the Applicant itself notes, the COVID-19 pandemic had a particular impact on the UK glass market, leading to abnormal stocking behaviour both during and shortly after the pandemic with *“customers running down stocks as confidence increased and inflationary pressure”*.³⁴

54. Moreover, in addition to the impact of the COVID-19 pandemic, the Applicant has highlighted an additional risk of distortion arising from the use of 2022 as the starting point for the assessment of injury, given the significant demand impact caused by the Russian invasion of Ukraine in February. As the Applicant suggests, *“there may have been an artificial short-term demand increase at the beginning of the Russian invasion due to the closure of Ukrainian glass manufacturing facilities.”*³⁵

³³ Commission Implementing Regulation (EU) 2025/2219 of 3 November 2025 imposing provisional anti-dumping duties on imports of softwood plywood originating in the Federative Republic of Brazil, OJ L series, 4.11.2025, available [here](#).

³⁴ Application, at page 13.

³⁵ Application, at page 13.

55. Huaxing Group respectfully submits that, if the TRA takes due account of this context in its assessment of injury trends, it must conclude that the injury alleged by the Applicant in the period provided is in part the result of COVID-19 driven trends. Thus, neither 2021 nor 2022 can reasonably be treated as an absolute baseline purporting to be representative of normal market conditions. Huaxing Group therefore submits that the TRA should consider selecting a longer reference period to assess the *genuine* evolution of the situation of the UK industry — and which therefore includes ‘normal’ market conditions prior to the COVID-19 pandemic. In the alternative, should the TRA decide to maintain its selected period of investigation considered, Huaxing Group respectfully submits that it should ensure that this context is properly taken into account for the purposes of the injury assessment — and that the evolution of injury indicators is appropriately examined with this in mind. When viewed from this perspective, it is clear that the UK industry is not in a situation of injury within the meaning of paragraph 5 of Schedule 4 to the TCBTA.

56. Quite contrary, the period of 2023-2024 instead represents a stabilization of the market from its exceptionally elevated performance in 2021-H12022. For example, this context readily explains the trends in the UK industry’s sales volumes, remaining virtually static throughout 2023 and 2024 after a slight decline from exceptionally elevated levels in 2021-2022:

UK industry sales (kg) (2021-2024)				
	2021	2022	2023	2024
Index	100	104	91	89

Source: Application³⁶

4.2 The UK industry’s market share has significantly improved during the Application POI

57. Although the market share figures provided by the Applicant are set out entirely in the form of indexes in the Application, Huaxing Group notes that the UK industry has recorded a considerable increase in its UK market share in 2024, rising both in terms of value to 97% of its 2021 starting point (the highest in the entire Application Injury Period subsequent to 2021), and in volume (registering an increase of 2 percentage points and recovering to 2022 levels).³⁷

³⁶ Application, at Annex 9 (Injury factors workbook – UK Industry Injury Factors).

³⁷ Application, at page 13.

58. Curiously, the Applicant attempts to minimise this performance and asserts that after dropping significantly, the market share of the UK industry has remained at a similar level in 2023 and 2024. This only further supports the explanation put forward by Huaxing Group in Section 4.1 (above), and demonstrates that after enjoying a particularly elevated performance in 2021 — due to the exceptional economic conditions of the post COVID-19 economic resurgence — the market subsequently stabilised from the latter half of 2022 and into 2023-2024. That said, it is clear that the UK industry is going from strength to strength. At the same time as the Applicant claims that the UK is suffering injurious dumping caused by glass container imports from China, so too does it register a considerable increase in its own UK market share, recovering to 2022 levels.

4.3 Chinese glass producers fill a market need and do not compete with the UK industry

59. Finally, the Applicant disregards the fact that Chinese glass container exporters fill the gap created by capacity shortages in the UK. UK furnaces have been running at the same high level of capacity utilization since 2021.³⁸ While UK producers have sold slightly less output in terms of volume during the injury period,³⁹ they have sold significantly more in terms of value.⁴⁰ This is the opposite of the outcome which would be expected in the face of dumped Chinese goods (*i.e.*, the same or higher output in terms of volume than in terms of value). These trends suggest that UK producers are actually able to increase prices for output of glass containers, and that if they are competing with Chinese imports at all for market share it is in small or low-value markets which do not affect the overall sales value of the industry.⁴¹

³⁸ Application, at page 55. The data provided by the Applicant regarding capacity utilization is company-specific because the Applicant did not have access to industry-wide data.

³⁹ In any case the decline in industry-wide output from a baseline level in 2021 is potentially the result of the brief uptick in demand for glass containers in the years immediately following the pandemic, which the Applicant failed to account for. See section 4.1 *supra*.

⁴⁰ Application, at page 52.

⁴¹ This conclusion is further reinforced by the data which shows that the market share of UK glass container producers has remained more or less steady throughout the Application injury period. See Application, at page 53.

60. This interpretation of the data can be corroborated by the experience of Huaxing Group as it pertains to the role of Chinese exporters in the UK market. First, as stated above, Huaxing Group meets the supply needs of UK users and consumers when the domestic industry can no longer meet demand, and especially around the holiday season. Second, Chinese producers like Huaxing Group can meet UK supply needs with less turnaround than domestic producers. In the experience of Huaxing Group, UK producers typically quote lead times of at least 24 weeks to meet orders of glass containers, whereas Chinese suppliers such as Huaxing Group can satisfy orders within 8 weeks. Third, Chinese manufacturers like Huaxing Group can provide low-volume custom production to meet the specific needs of niche UK markets. UK producers are unable to provide custom glass containers at the same relatively low volume as Chinese producers. Therefore, small businesses which use customised glass containers in their production process actually rely upon Chinese exporters for inputs that cannot be substituted by domestic industry.

61. It is thus clear that Chinese exporters play a fundamentally different role in the UK glass container market to domestic producers, and even complement domestic production insofar as they meet market needs which cannot be satisfied domestically. Therefore, any duties on glass containers from China will provide no relief to the domestic industry and will only harm users or consumers in the UK. The UK industry does not have the extra capacity to scale up production and will not suddenly cut its lead time for production or acquire the ability to produce customised glass container products. Instead, users and consumers (especially small businesses which rely on more nimble Chinese production capabilities) will continue to import glass containers either from China or from some other country. Therefore, antidumping duties on Chinese glass containers will only harm UK economic interests. To avoid an investigation that would result in such a deleterious outcome, the TRA should find that the Application failed to adequately consider whether Chinese imports actually compete with the domestic industry for market share.

5. THERE IS NO CAUSAL LINK BETWEEN THE SITUATION OF THE UK INDUSTRY AND IMPORTS OF GLASS CONTAINERS FROM CHINA

5.1 The Applicant fails to establish any evidence of a causal link (*i.e.*, no positive causation)

62. Huaxing Group recalls that an essential precondition to the initiation of an anti-dumping investigation under the TCBTA is that an application contains ‘sufficient evidence’ that the allegedly dumped imports are causing injury to the relevant UK industry.⁴² In support of its allegation in this regard, the Applicant simply refers to official import statistics from HMRC and asserts that “*a large increase in the quantity of imported tonnages can be observed from 2022 to 2025*” (on the basis of available data up to July 2025).⁴³

63. With respect, Huaxing Group respectfully submits that this presentation is wholly inadequate from the perspective of engaging the requisite legal standard for the initiation of an anti-dumping investigation with respect to glass containers from China. The Applicant fails to acknowledge in any meaningful way that imports from China actually *fell* by approximately 3% between 2023 and 2024,⁴⁴ glossing over this important development and claiming simply that “[i]mport tonnages remain similarly high in 2024”.⁴⁵

64. Yet, this is a period of particular importance — the very moment when the Applicant claimed that the UK industry was suffering injury as a result of the impact of allegedly dumped imports from China. Huaxing Group respectfully submits that this basic reality conclusively rebuts any claim regarding the existence of a causal link between Chinese imports and the situation of the UK industry. If the situation of the UK industry was indeed negatively impacted by the increased presence of Chinese imports of glass containers, then it is incumbent on the Applicant to explain why the reduced presence of Chinese imports on the UK market did not lead to the immediate improvement of the UK industry’s situation. Instead, even with less Chinese imports on the UK market, the situation of the UK industry continued to decline across various key economic indicators.

⁴² TCBTA, Schedule 4, paragraph 5, available [here](#).

⁴³ Application, at page 59. Notably, the Applicant has deemed value data from the same source to be unreliable.

⁴⁴ Application, Annex 2 (Mass Summary).

⁴⁵ Application, at page 59.

65. The Application does not address this and does not provide any meaningful evidence substantiating the existence of a causal link between the impact of the allegedly dumped imports from China and the situation of the UK industry. The failure by the TRA to require such substantiation constitutes an unreasonable failure to take into account a highly relevant factor for its assessment of whether the basic requirements outlined in paragraph 5 of Schedule 4 to the TCBTA are engaged.

5.2 The alleged injury (if any) is caused by factors other than the allegedly dumped imports of glass containers from China

66. In its response to Question 2 of the Causation Section of the Application — which invites it to provide information identifying other factors of potential impact on the situation of the UK industry — the Applicant appears to refer to a number of factors in addition to imports from Türkiye (see Section 3 (above)), namely the impact of the COVID-19 pandemic, the level of technological development of the UK industry, and the export sales performance of the UK industry. However, the Applicant immediately rejects the relevance of these factors out of hand, simply concluding that it is aware of no other “*current source of injury affecting the UK container glass industry*.”⁴⁶

67. Huaxing Group fundamentally disagrees with this conclusion. To the extent that the UK industry is suffering material injury (if any), the situation can be explained by several other factors which are entirely unrelated to imports of glass containers from China.

5.2.1 The UK industry has been particularly negatively impacted by domestic ‘environmental’ regulation

68. Huaxing Group considers that the Application does not adequately consider the role played by domestic ‘environmental’ regulation in the UK — despite identifying this as a key factor shaping the UK market in a separate section of the Application.

69. With the proliferation in recent years of government initiatives to support climate objectives, various industries in the UK have faced a considerably increased compliance burden — both in terms of direct costs and administrative overheads.

⁴⁶ Application, at page 59.

70. For example, the UK Emissions Trading System ('**UK ETS**') requires UK producers to monitor, report and supply allowances to cover CO2 emissions associated with their production activities. While a certain number of free allowances has generally been granted to date, the UK Government has indicated its intention to begin phasing these out from 2027. According to the Applicant, this situation has been further complicated for the UK industry by the fact that benchmarks are based on the EU market — which notably is less carbon intensive in composition than the UK energy market which has comparatively less renewable and nuclear energy production. As a result, the Applicant considers that the UK industry will need to purchase approximately one third of its total emissions, at a total cost of GBP 29 million from 2026, increasing year-on-year thereafter.

71. Most strikingly, however, the Application makes no reference whatsoever to the Packaging Extended Producer Responsibility scheme ('**pEPR**'),⁴⁷ which is a UK-wide scheme that requires packaging producers (including the UK industry) to cover the **full** cost of managing household packaging waste. This includes the costs of collecting, sorting, recycling and disposing of packaging once it is discarded by consumers.⁴⁸

72. Crucially, a revised scheme began during April 2025 (*i.e.*, during the POI for the investigation), replacing a previous iteration that had first been introduced under the EU Packaging and Packaging Waste Directive, whereby producers paid only a proportion of the costs in question. During the first year of operation of the pEPR (*i.e.*, 2025-2026), UK producers were required to pay flat base fees per tonne of material, with no adjustment to account for the recyclability of the material in question. For example, the base fee for glass during this period was GBP 192.⁴⁹

⁴⁷ The Producer Responsibility Obligations (Packaging and Packaging Waste) Regulations 2024, available [here](#).

⁴⁸ House of Commons Library Research Briefing, *Packaging extended producer responsibility*, 13 January 2026, available [here](#).

⁴⁹ House of Commons Library Research Briefing, *Packaging extended producer responsibility*, 13 January 2026, available [here](#).

73. When the scheme was first being developed in late 2024, the UK glass industry voiced considerable concern with respect to how the fees for the scheme were established, and the fact that there would be a disproportionate cost burden on heavier materials (*i.e.*, glass).⁵⁰ As the pEPR has been implemented in the period since, it has become abundantly clear that the costs burden associated with the pEPR poses a direct threat to the long term competitiveness of the UK industry. In May 2026, the industry body British Glass argued that glass producers were being placed at a competitive disadvantage compared to other materials such as plastic and aluminium — which did not face equivalent costs despite concerns over recyclability and emissions.⁵¹ To this end, British Glass warned that the cost impact of the pEPR for the UK industry — amounting to an uplift of approximately GBP 0.10 – 0.12 per item — was leading many UK producers to reconsider investment plans to modernise facilities and cut carbon emissions. According to British Glass, around 20 separate sites were reconsidering investment plans of up to GBP 100 million each, potentially jeopardising up to 120,000 jobs in the wider supply chain.⁵²

74. Despite the obvious relevance of the additional compliance costs resulting from the pEPR — affecting the margins of the UK industry most significantly during the POI for the investigation — the Applicant does not even mention it. Moreover, given the clear focus of the UK industry on this measure, Huaxing Group must call into question the Applicant’s total failure to even identify the measure as potentially of relevance for the UK market alongside other government regulatory measures.

5.2.2 The UK industry has been vulnerable to external shocks affecting energy and electricity prices

75. The Applicant fails to take proper account of the relevance of increasing energy costs in driving the decline in the situation of the UK industry, despite expressly identifying this as a relevant factor having a bearing on this elsewhere in the Application. To this end, the Applicant notes that energy price volatility can — in and of itself — threaten the competitive position of UK glass containers from two separate angles, by incentivising consumers to switch materials and / or leading to increased imports.⁵³

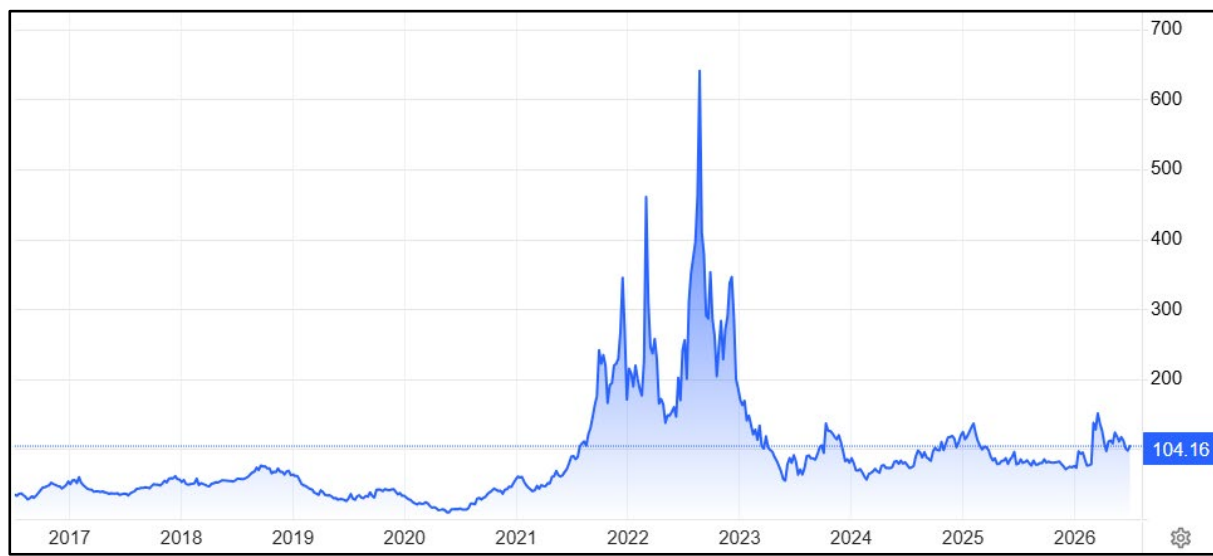
⁵⁰ Packaging News, FPA highlights packaging industry concerns over EPR fees based on weight, 13 September 2024, available [here](#).

⁵¹ LLB, *Glass industry warns 120,000 jobs at risk as levy drives investment overseas*, 9 May 2026, available [here](#).

⁵² LLB, *Glass industry warns 120,000 jobs at risk as levy drives investment overseas*, 9 May 2026, available [here](#).

⁵³ Application, at page 13.

76. It is settled ground that natural gas and electricity are both significant cost factors of the production of glass containers. Prices for both began to rise significantly in late 2021, reaching their significantly elevated peak in late 2022 as a result of the energy crisis provoked by the Russian invasion of Ukraine. While prices began a downwards trend in early 2023, overall, natural prices on the UK market have remained at a level multiples of their starting points in 2021:



UK Natural Gas (GBp/thm)(2017 - 2026)

Source: Trading Economics, UK Natural Gas (GBp/thm)⁵⁴

77. This is similarly the case with respect to electricity prices, which essentially show the same trend. UK electricity spot prices almost tripled between the end of 2020 and their peak in late 2022 – early 2023. Again, while prices have since begun to subside from this peak, they remain quite considerably elevated by comparison with 2021 levels:

⁵⁴ Trading Economics, UK Natural Gas (Accessed on 1 July 2026), available [here](#).



UK Electricity Spot Prices (GBP/MWh)(2017 - 2026)

Source: Trading Economics, UK Electricity Spot Prices (GBP/MWh)⁵⁵

78. In addition to these general trends, the Applicant further explains that prices for the UK industry have remained higher than pre-2022 levels for glass manufacturers because many had secured long-term energy prices through hedging contracts in the (then) competitive energy market. In the current environment, however, energy companies are not offering these long-term contracts, due to the impact of the energy crisis on the UK energy market.⁵⁶

79. Yet, at the same time, it must be highlighted that the nature of glass container production is such that producers are particularly sensitive to a shock in energy costs. As the Applicant points out elsewhere in the Application, “*glass furnaces must remain active 24 hours a day and therefore cannot be turned off when demand reduces, therefore when furnaces are not producing at their full capacity the costs of running will remain higher compared to other industries*”.⁵⁷ This is a systemic vulnerability on the part of the UK industry, which has been fully exposed to the combined headwinds of reduced demand and massively increased energy costs during much of the Application Injury Period.

⁵⁵ Trading Economics, UK Electricity Spot Prices (Accessed on 1 July 2026), available [here](#).

⁵⁶ Application, at page 13.

⁵⁷ Application, at page 53.

80. Despite the obvious relevance of this factor as a (negative) driver of the production costs/sales prices/profitability of the UK industry, the Applicant makes no attempt to identify this or consider its impact — instead incorrectly attributing the impact of this entirely to the allegedly dumped imports from China.

5.2.3 The declining profitability of the UK industry is the result of consistently high levels of investment

81. Huaxing Group notes that for an industry allegedly suffering injury, the UK industry certainly has sufficient capacity to invest in record levels. While the Applicant fails to provide clearly identifiable data for the UK industry as a whole, it is striking to note that the ‘company’ level data reveals a generally strong pattern of consistent investment by the UK industry during the Application Injury Period.

82. Indeed, despite a sharp fall in 2023, the UK industry has otherwise recorded investments in 2022 and 2024 that are considerably higher than 2021 levels, representing increases of 23% and 28% respectively. Most notably, the Applicant recorded its highest single year of investment in 2024 — the Application POI when it claims to be suffering material injury as a result of the impact of the allegedly dumped imports from China.

83. Huaxing Group takes note of the Applicant’s position that this consistently strong and increasing level of investment can be explained as being due to “*the UK industries commitment towards decarbonisation*”. According to the Application, this “*would require the installation of the UK’s first electric melting furnaces and the infrastructure to power them, the commitment for investment will have to be high*”.

84. That said, the Applicant fails to acknowledge that were these investments not made to such an extent, they would instead be reflected in the profitability of the UK industry. Investments on such a scale thus clearly explain why the UK industry’s profitability roughly halved in 2024 (i.e., from ‘163’ in 2023 to ‘86’ in 2024), corresponding directly to a more than doubling in investment by the UK industry in 2024 (i.e., from ‘57’ in 2023 to ‘128’ in 2024).⁵⁸ Conversely, the profitability of the UK industry was at its greatest in 2023 (i.e., ‘163’),⁵⁹ the very year when investments fell to their lowest level in the Application Injury Period (i.e., ‘57’).⁶⁰

⁵⁸ Application, at Annex (UK Industry Injury Factors).

⁵⁹ Application, at Annex (UK Industry Injury Factors).

⁶⁰ Application, at Annex (UK Industry Injury Factors).

85. In this light, it is clear that imports from China did not cause the declining profitability of the UK industry.

5.2.4 Declining demand for glass products has caused harm to the UK industry

86. There is a strong factual basis to find that a decline in demand and a corresponding decline in glass container consumption is a factor that is a source of harm to the UK industry. Indeed, a coalition of wine bottle producers in the United States (many of which also carry out production in the UK) was found not to have been harmed by Chinese imports on this basis.⁶¹ Despite several UK producers' involvement in this investigation, and the acknowledgment elsewhere in the Application that demand for glass containers has declined,⁶² the Applicant does not address declining demand as a potential factor to which injury could be attributable.

87. Moreover, alcohol consumption both worldwide⁶³ and in the UK⁶⁴ has reached record lows in recent years. This will have had a knock-on effect on the consumption of glass bottles for wine, beer, and spirits. It is highly likely that the decline in alcohol consumption has harmed UK industry independently of the effect of imports. This factor and the fact that demand for glass containers has declined overall should have been examined more thoroughly in the application and are certainly both well known to the Applicant. These factors should be presumed as an underlying cause of harm to the domestic injury, and the Applicant's failure to account for them represents a fatal flaw in its assertion that injury to the domestic industry is caused by imports from China.

5.2.5 Any harm from imports of glass containers should be attributed to imports from Türkiye

88. As Huaxing Group established in Section 3, imports from Türkiye should not be cumulated with imports from China because imports from the two countries are being assessed under two distinct trade defence instruments. When imports from the two countries are assessed individually, it becomes evident that imports from Türkiye are the underlying cause of any harm to the UK industry, if such injury is caused by imports at all.

⁶¹ See U.S. International Trade Commission – Final Report – Glass Wine Bottles from China and Mexico – Investigation Nos. 731-TA-1662-1663, available at [here](#), at p. 27.

⁶² Application, at p. 13.

⁶³ Reuters, Alcohol drinking will shrink in the next decade, research finds, (11 June 2026), available [here](#).

⁶⁴ The Guardian, *Britons reported to be drinking less, as data shows consumption at record low* (22 December 2025), available [here](#).

89. First, import volumes from Türkiye are larger and have developed more acutely than those from China. Import volumes from China reach 35,000 tonnes in 2023 and 2024, but otherwise have remained below the level of 25,000 tonnes.⁶⁵ Indeed, aside from those two years, the volume of imports from China has remained remarkably steady since 2015. The volume of imports of glass containers from China in 2025 – just under 20,000 tonnes – is in line with import volumes that persisted well before the injury period.⁶⁶

90. By contrast, import volumes from Türkiye increased rapidly in recent years. Imports have gone from almost zero in 2018 and years preceding, to roughly 25,000 tonnes in 2019, to well over 30,000 tonnes in every following year.⁶⁷ In every year since 2018, import volumes of glass containers from Türkiye have eclipsed those from China. Therefore, in terms of sheer volume, imports from Türkiye are a greater cause of harm to the UK industry than those from China.

91. The fact that Türkiye is a larger source of imports by volume is amplified by the fact that prices of imports from Türkiye are much lower than prices from China. Between 2021 and 2025, the price of imports from China ranged between £1600 to £2200 *per tonne*.⁶⁸ Over the same period, the prices of imports from Türkiye ranged between the vastly lower levels of £390 and £605 *per tonne*.⁶⁹ This indicates not only that Turkish imports account for a higher volume of harmful imports, but also that the level of harm caused by Turkish imports is much more pronounced than for Chinese imports.

⁶⁵ Application, at page 59.

⁶⁶ Türkiye Application, at page 50.

⁶⁷ Türkiye Application, at page 50.

⁶⁸ Application, at Annex A2. For reasons explained in Section 2 *supra*, the Commission should rely on the actual import price of glass containers as maintained in the official HMRC import statistics to determine the level of injury caused by Chinese imports.

⁶⁹ Türkiye Application, at page 50.

92. Viewed holistically, the picture is clear – while imports from China have remained a long-term source of supply for UK users, imports from Türkiye have flooded in recent years at price levels which are far lower than Chinese imports. The Applicants do not account for imports from Türkiye whatsoever in the Application, and for that matter do not attempt to address Chinese imports in the Türkiye Application. Rather, the Applicants double-dip – arguing for two remedies to cure the same injury. Based on the facts described above, the sole injury in this case, if it is not caused by some other factor, is bound to be caused by the influx of Turkish imports of glass containers which are allegedly subsidised. The Applicant’s failure to even attempt to argue that injury caused by Chinese imports is distinct from that caused by Turkish imports, along with its failure to address the other factors addressed above, is thus a failure to satisfy the basic legal requirement under UK law and Article 5.8 of the WTO Anti-Dumping Agreement that the basic elements of injury be established.

6. THE IMPOSITION OF ANTI-DUMPING MEASURES ON IMPORTS OF GLASS CONTAINERS FROM CHINA WOULD NOT BE IN THE UK ECONOMIC INTEREST AS THE UK FACES ANOTHER PROTRACTED ‘COST OF LIVING’ CRISIS

93. Huaxing Group notes that the Applicant fails to address the economic interest test in any way in the non-confidential version of the Application. However, this is an important consideration in the context of a dumping investigation under UK law. As the TRA is aware, when making a recommendation to the Secretary of State to impose an anti-dumping amount, it must advise the Secretary of State whether and why it considers that the imposition of anti-dumping duty would meet the economic interest test as outlined in paragraph 25 of Schedule 4 to the TCBTA.⁷⁰

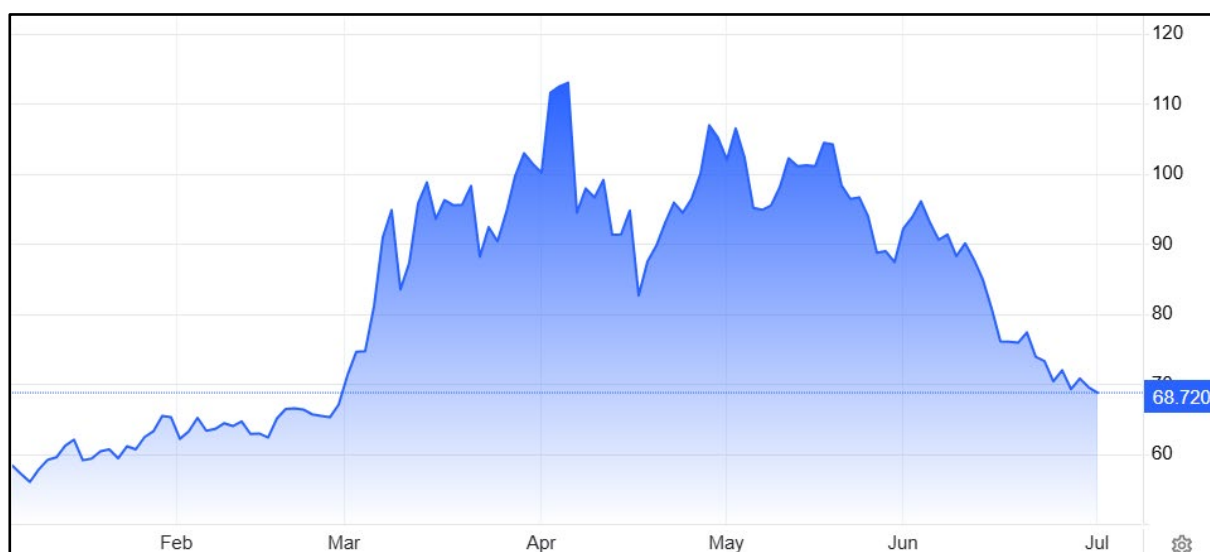
94. While it might simply have been taken for granted by the Applicant that the imposition of anti-dumping duties against glass containers from China would be in the UK economic interest when first formulating and filing its Application, this simply cannot be presumed in the present context.

⁷⁰ TCBTA, Schedule 4, paragraph 17(8E), available [here](#).

95. Huaxing Group considers that any such presumption is conclusively rebutted in the present circumstances. Crucially, it must be highlighted that the Application was filed with the TRA on or around 3 February 2026. Since this date, the geopolitical landscape has changed fundamentally as a result of the US-Israel conflict with Iran which started weeks later on 28 February 2026, and the resulting energy supply crisis caused by the ongoing closure of the Strait of Hormuz. While Huaxing Group acknowledges that these developments — and their wider impact — could not necessarily have been foreseen by the Applicant at the time of filing its Application, the UK economy as a whole has since faced a paradigm shift in the intervening period.

96. As the TRA is well aware, the UK has been heavily affected by the energy shock resulting from the crisis in the Middle East. In the weeks since the conflict first began, crude oil prices have spiked by approximately **60%**:

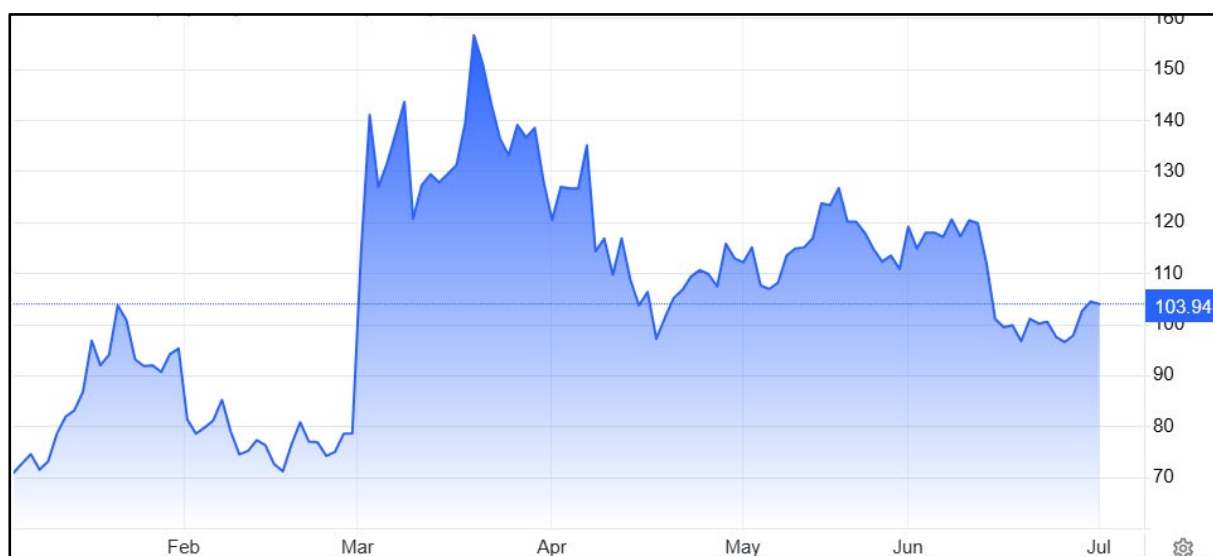
Brent Crude Oil (USD/Bbl)(January 2026-June 2026)



Source: Trading Economics, Brent Crude Oil (USD/Bbl)⁷¹

97. In parallel, UK natural gas prices have increased by approximately **55%**:

⁷¹ Trading Economics, Brent Crude Oil (Accessed on 1 July 2026), available [here](#).



UK Natural Gas (GBP/thm)(January 2026-June 2026)

Source: Trading Economics, UK Natural Gas (GBP/thm)⁷²

98. Indeed, the immediate cost of this price shock is perfectly quantifiable. While economic forecasts had anticipated a fall in UK inflation — from 3% at the start of 2026 to 2% from April 2026 — it is now well recognised that UK is facing a protracted period of inflationary pressures. On 19 March 2026, the Bank of England announced its preliminary estimation that consumer price inflation would be more likely to reach between 3% and 3.5% in the second and third quarters of 2026, due to higher energy prices.⁷³ More recently, the Bank of England indicated that it expected inflation to reach 4% by the end of 2026.⁷⁴ The Middle East conflict is having a very real impact on UK consumers — notably, food inflation alone was up 3.7% in March 2026, a sharp increase from 3.3% in February.⁷⁵

⁷² Trading Economics, UK Natural Gas (Accessed on 1 July 2026), available [here](#).

⁷³ House of Commons Library Research Briefing, *Economic Update: Middle East conflict and the UK economy*, 24 March 2026, available [here](#).

⁷⁴ Reuters, Bank of England's Bailey says public must be given confidence in 2% inflation target, 2 June 2026, available [here](#).

⁷⁵ House of Commons Library Research Briefing, *Economic Update: How resilient are current supply chains?*, 29 April 2026, available [here](#).

99. Indeed, the UK Government has itself already directly acknowledged the clear and immediate threat to the UK economy caused by the impact of the Middle East conflict — taking robust and decisive policy action to address this. On 27 May 2026, the UK Government launched a public consultation on an indicative list for goods to be made subject ‘cost of living’ tariff suspensions — namely the suspension of import duties on a range of vital agricultural goods, fertilisers and kerosene in order to “*help mitigate the consumer impact of the conflict in the Middle East*”.⁷⁶ This followed the earlier announcement on 30 April 2026 of a temporary suspension for import duties on a selection of food items and agricultural products.⁷⁷

100. As the Applicant has noted, the consequence of the previous 2022-2023 energy crisis driven by the Russian invasion of Ukraine was a considerable — and permanent — uplift in energy costs. The current energy shock caused by the Middle East crisis shows no sign of ending in the foreseeable future, and analysts predict that it could have an economic impact equivalent to the 2022-2023 crisis in Europe (including the UK) should the Strait of Hormuz remain closed.⁷⁸ The resulting cost inflation will inevitably entail a corresponding uplift in the prices of the UK industry.

101. Given the significant economic impact of the ongoing geopolitical situation, Huaxing Group respectfully submits that the TRA must properly take into consideration the wider UK economic interest when considering whether to impose anti-dumping measures against imports of glass containers from China in the current investigation. The likely consequence of such anti-dumping duties against imports from China would be to effectively foreclose the UK market altogether — shutting the door on UK downstream users that would otherwise rely on China as a source of affordable supply.

⁷⁶ Department for Business and Trade, *Call for input on goods for cost of living tariff suspensions*, 27 May 2026, available [here](#).

⁷⁷ UK Government Guidance, UK Trade Tariff: duty suspensions and autonomous tariff quotas, available [here](#).

⁷⁸ Pub Affairs Bruxelles, *Energy shock 2.0: Lessons from 2022 for the Hormuz crisis*, 14 April 2026, available [here](#).

102. However, just like the Applicant, these UK companies will also be contending with the effects of the energy crisis caused by the ongoing conflict in the Middle East. Given the structural importance of glass containers as a vital cost component of UK food and beverage producers, the imposition of anti-dumping duties against imports of glass containers from China would thus simply drive up costs for UK downstream users and UK consumers — serving only to aggravate a serious cost of living crisis and undermining UK Government policy to alleviate food price pressures for UK consumers. Indeed, it is entirely counterintuitive for the UK Government to suspend import tariffs for a wide range of food products, if food prices would simultaneously be driven up by the impact of anti-dumping duties.

103. Ironically, at the same time, those anti-dumping duties would utterly fail in their purported objective to shore up the position of the UK industry, given the clear broader economic hit that will result from increased energy costs for the foreseeable future. Huaxing Group respectfully reminds the TRA that such economic difficulties are not to be remedied through the imposition of anti-dumping measures, but through separate industrial policy measures — which the UK Government is in the process of developing.

104. As paragraph 25 of Schedule 4 to the TCBTA makes clear, when conducting the economic interest test, the TRA is required to take into account the interests of the various parties in a transparent manner, including UK downstream industries and consumers. The economic interest test should not simply be treated as synonymous with the interests of the applicant in the particular dumping investigation at hand.

105. Any presumption that the UK economic interest favoured the imposition of anti-dumping duties against glass containers from China has been turned inside out by the new geoeconomic reality facing the UK as a result of the Middle East crisis. As the UK faces another protracted cost-of-living crisis driven by increased energy costs, the interests of users and ordinary consumers throughout all regions of the UK would be heavily impacted by the imposition of duties. Moreover, rather than protect the competitiveness of the UK industry, anti-dumping duties would be futile in the current economic climate, while simultaneously undermining food security in the UK by driving up prices of key inputs.

106. Huaxing Group respectfully submits that the imposition of anti-dumping measures with respect to imports of glass containers from China is clearly not in the economic interest in these exceptional circumstances. Instead, the situation of the Applicant and the wider UK industry — which will undoubtedly worsen in coming months as a direct consequence of the Middle East crisis rather than the impact of imports — is best addressed by industrial policy measures at UK Government level, rather than anti-dumping measures.

7. CONCLUSION

107. In view of the foregoing, Huaxing Group submits that the investigation should be terminated forthwith. Given the limited weight that can be attributed to the evidence and information provided in support of the Application, the investigation should not have been initiated in the first place — falling well short of the requisite standard under UK law and Article 5.8 of the WTO Anti-Dumping Agreement.

108. Should the TRA nonetheless decide to impose anti-dumping measures on imports of glass containers from China in this investigation, *quod non*, Huaxing Group respectfully requests that the TRA ensures that the UK economic interest is properly taken into account when setting the level of anti-dumping duties on the basis of regulation 36 of the Dumping and Subsidisation Regulations — ensuring that this does not disproportionately restrict imports which are a vital source of supply for UK users.

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