



7 August 2026

***OPEN VERSION FOR CONSULTATION***

**BEFORE THE  
TRADE REMDIES AUTHORITY**

In the matter of Anti-dumping Investigation concerning  
Glass containers originating in the  
People's Republic of China (PRC)

No. AD0087

---

**Request for Product Exclusion**

---

On behalf of SGD Asia Pacific



## Request for Product Exclusion

### I. Introduction

- [1] On 05 March 2026, the Trade Remedies Authority (TRA) makes a Notice under paragraph 9(5) of Schedule 4 to the Taxation (Cross-border Trade) Act 2018 (the Act) to initiate an anti-dumping investigation concerning glass containers originating in the People's Republic of China.
- [2] On 20 March 2026, SGD Asia Pacific("SGD") submitted its reply to the Registration Form for Interested Parties and Contributors and has successfully registered as an interested party in this case. On 17 April 2026, SGD further filed detailed written comments on the proposed sampling scheme, formally raising preliminary differentiation between cosmetic glass containers and other ordinary glass packaging. All prior submissions are fully recorded in the official case file of AD0087.
- [3] SGD Asia Pacific respectfully draws the TRA's attention to the fact that the scope of this investigation is relatively broad, encompassing cosmetic bottles, pharmaceutical bottles, and beverage bottles. In its reply to the registration form, as well as in its subsequent comments on the proposed sample, SGD Asia Pacific elaborated in detail on the differences between cosmetic bottles and other types of bottles.
- [4] On behalf of SGD, we respectfully submit this request for the exclusion of glass containers for cosmetic products ("Cosmetic Glass Containers") from the product scope of the dumping investigation concerning imports of glass containers originating in the People's Republic of China (AD0087).
- [5] As mentioned previously, SGD is an exporting producer of glass containers.  
【Deleted, Business Secrets】 The containers are produced to customer-specific design and branding requirements and are dedicated to the cosmetic product. After the bareglass has been formed, it undergoes substantial decoration processing, which may include spray coating, frosting, screen printing, pad



printing, hot stamping, electroplating, water-transfer printing, heat-transfer printing, digital printing and optical coating.

- [6] As will explain below, the UK industry does not manufacture Cosmetic Glass Containers. Moreover, the glass containers manufactured by the UK industry are not like goods with Cosmetic Glass Containers. SGD therefore respectfully requests that the TRA exclude Cosmetic Glass Containers from the product scope.

## II. The UK Industry Does Not Manufacture Cosmetic Glass Containers

- [7] To SGD's knowledge, UK producers do not manufacture Cosmetic Glass Containers. Their production is principally bottles and jars for food and beverages, and containers for pharmaceutical applications.
- [8] The materials provided in the Application corroborate this point. The links contained in the Application's annex entitled "UK Glass Manufacturers Catalogues List" present the UK manufacturers' product ranges, covering the complete product lines of all UK producers (See Annex 1). Those product ranges consist overwhelmingly of containers for alcoholic beverages, food and other drinks, and a limited number of pharmaceutical containers. None of the identified UK manufacturers produces glass containers for cosmetic products.
- [9] In Investigation AD0047 concerning certain excavators from China, XXXL excavators were excluded from the definitive anti-dumping measure. The TRA found that UK industry did not manufacture any excavators within the XXXL category and that those goods had not caused injury to the UK industry.<sup>1</sup> The same reasoning applies in the present investigation. Since the UK industry does not manufacture Cosmetic Glass Containers, imports of those containers cannot cause injury to the UK industry and should therefore be excluded from the product scope.

---

<sup>1</sup> See Final Determination, Dumping investigation into certain excavators imported into the United Kingdom originating from the People's Republic of China (AD0047).



### III. Cosmetic Glass Containers Are Not Like Goods to the Glass Containers Produced by the UK Industry

- [10] Paragraph 7 of Schedule 4 to the Taxation (Cross-border Trade) Act 2018 defines “like goods” as those which are like the goods concerned in all respects or have characteristics which closely resemble them.
- [11] In practice, in assessing like goods, the TRA has considered: (a) physical likeness; (b) commercial likeness, including competition and distribution channels; (c) functional likeness, including end use and interchangeability; (d) similarities in production methods and inputs; and (e) any other relevant characteristics.<sup>2</sup>
- [12] Considering the above criteria, Cosmetic Glass Containers are not like goods to the glass containers produced by the UK industry, as demonstrated below.

#### *i. Different physical characteristics*

- [13] Cosmetic Glass Containers are custom-made to deliver the visual identity required by the cosmetic brand. The formed bareglass is subjected to elaborate decoration processing to create metallic, iridescent, multi-layered or textured decorative effects. The processing includes coating, frosting, printing, hot stamping, electroplating, transfer printing and optical coating. The resulting appearance is materially different from the glass containers shown in the UK producers’ catalogues. (As shown in the pictures below)

【Deleted, Business Secrets】

- [14] The differences are not merely aesthetic. Certain coating also alters the surface properties of the container, including improvement of resistance to abrasion and corrosion and reducing of fingerprint marking. Those features form part of the performance and premium presentation required by the cosmetic products

---

<sup>2</sup>See, e.g., Statement of Essential Facts, Dumping Investigation into Tin Mill Products imported into the United Kingdom from the People’s Republic of China; TRA, Statement of Essential Facts, Optical Fibre Cables imported into the United Kingdom from the People’s Republic of China.



packaging.

- [15] Furthermore, excluding Cosmetic Glass Containers is feasible and Customs authorities can easily identify them via visual inspection. Therefore, the exclusion will not give rise to any risk of circumvention.

*ii. Different production process and cost*

- [16] The production process of Cosmetic Glass Containers differs materially from the glass containers produced by the UK industry. Compared with the production process submitted by the UK industry (see Annex 2), SGD's manufacturing process for bareglass includes 【Deleted, Business Secrets】 (See Annex 3).

- [17] Moreover, the manufacturing process for Cosmetic Glass Containers does not end once the bareglass has been formed. Taking a representative SGD product as an example, following formation of the bareglass, the product undergoes several additional decoration processing, including spray coating, screen printing and optical coating. By contrast, the UK industry's production process proceeds directly from formation of the bareglass to inspection, packing and dispatch. It does not include the substantial decoration processes required to manufacture SGD's Cosmetic Glass Containers.

- [18] The cost reflects the significance of these additional processing. For example, for the SGD product described above, the cost of the undecorated bareglass is 【Deleted, Business Secrets】 per thousand pieces, whereas the decoration processing cost is 【Deleted, Business Secrets】 per thousand pieces. Decoration processing therefore accounts for approximately 【Deleted, Business Secrets】 of the cost. The value added after formation of the bareglass is substantially greater than the value of the bareglass itself.

- [19] Based on the EU Commission Regulation 2017/141, the EU Commission excluded flanged fittings after finding that they required additional costs and a more elaborate manufacturing process, and that butt-welding fittings could be



regarded as semi-finished products for the production of flanged fittings.<sup>3</sup> The parallel is particularly strong here, where the majority of the cost is incurred after the bareglass has been formed.

*iii. Different prices*

[20] The differences in production cost are reflected in selling prices. SGD representative cosmetic glass FOB UK price is **【Deleted, Business Secrets】** per thousand pieces, which is much higher than the price of normal pharmaceutical bottles, and beverage bottles.

[21] Luxury cosmetic packaging sits in a premium high-margin commercial segment entirely separate from low-cost mass food/beverage glassware; price tiering eliminates cross-market competition.

[22] It is also noteworthy that SGD's Cosmetic Glass Containers are sold at prices that generate a positive profit margin. This further demonstrates that SGD's export sales are commercially driven and are not made at dumped prices.

*iv. Different end use and lack of interchangeability*

[23] The products serve different end uses. The UK industry's products are principally used for food and beverages. SGD's Cosmetic Glass Containers are designed and decorated specifically for the packing and presentation of cosmetics.

[24] They are not interchangeable. A cosmetic brand cannot meet its packaging requirements regarding design, decoration and brand presentation by using glass containers intended for beverages or food product. Conversely, a food or beverage manufacturer has no commercial reason to purchase a premium, brand-specific Cosmetic Glass Container. Moreover, glass containers intended for food products and those intended for cosmetic products are subject to different testing requirements.

---

<sup>3</sup> COMMISSION IMPLEMENTING REGULATION (EU) 2017/141 of 26 January 2017 imposing definitive anti-dumping duties on imports of certain stainless steel tube and pipe butt welding fittings, whether or not finished, originating in the People's Republic of China and Taiwan, recital (70).



- [25] The customer groups are likewise distinct. Cosmetic Glass Containers are supplied to cosmetics manufacturers, 【Deleted, Business Secrets】, whereas the customers of UK glass container producers are primarily manufacturers and packers of food and beverage products. Accordingly, SGD and the UK producers do not compete for the same orders.
- [26] Accordingly, Cosmetic Glass Containers and the containers produced by the UK industry differ in physical characteristics, production process, cost, price and end use. They are neither interchangeable nor in competition, therefore cannot be treated as like goods.
- [27] In particular, SGD supplies cosmetic bottles 【Deleted, Business Secrets】. Therefore, in terms of their intended use, they do not compete with, nor are they interchangeable with, the bottles produced by the UK industry.

#### IV. The Potential Impacts of the Exclusion

- [28] To SGD's knowledge, UK producers do not have the capability to perform some of the decoration processing required for these Cosmetic Glass Containers, including optical coating. If Cosmetic Glass Containers are not excluded from the product scope, this would increase costs and create supply-chain risks for UK downstream users.
- [29] Furthermore, the requested exclusion would not cause injury to the UK industry. The UK industry does not manufacture like Cosmetic Glass Containers, and the products it manufactures are neither interchangeable with nor in competition with Cosmetic Glass Containers. In addition, SGD's selling price for Cosmetic Glass Containers is much higher than market price in UK for food and pharma of a bottle of similar capacity (ml) and would not in any way cause any injury to the UK industry.
- [30] The TRA adopted comparable reasoning in its transition review of measures on certain continuous filament glass fibre products from China. The TRA excluded mats from the product scope after finding that mats were not produced in the United Kingdom, and that mats were not interchangeable with the glass fibre products made by the UK industry. The exclusion of mats therefore would cause



no injury to UK industry.<sup>4</sup>

- [31] The same reasoning applies in the present investigation. The UK industry does not produce Cosmetic Glass Containers, and those containers are neither interchangeable with nor in competition with the products manufactured by the UK industry. Their exclusion would therefore cause no injury to the UK industry and would support the UK economic interest by avoiding unnecessary costs and supply-chain disruption for downstream users.

## V. Conclusion

- [32] In conclusion, the UK industry does not manufacture Cosmetic Glass Containers. Moreover, the glass containers manufactured by the UK industry are not like goods to Cosmetic Glass Containers, the two product categories differ materially in their physical characteristics, production processes and costs, prices and end uses. In particular, SGD's selling prices for Cosmetic Glass Containers are substantially higher than the prevailing UK market prices for food and pharmaceutical containers of comparable capacity. The two product categories are neither interchangeable nor in competition with one another. SGD therefore respectfully requests that the TRA exclude Cosmetic Glass Containers from the product scope of the investigation.

---

4 See Recommendation to the Secretary of State, Transition Review of the anti-dumping measure on certain continuous filament glass fibre products originating in the People's Republic of China (TD0008).