



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:

Sumilon Eco PET SARL

When you have completed each form, indicate the **confidentiality** status of the document by placing an ☒ in the relevant box below and in the header of the form:

☐

Confidential

☒

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

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



Introduction

Registration of interest to the investigation

We invite interested parties and contributors to **register** their interest in this investigation **by completing the relevant sections** as indicated in this form **and submitting the completed form** using the [Trade Remedies Service](#).

An interested party is either:

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

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

Scope of the investigation

The goods subject to investigation (Goods Concerned) are:

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

For further details, please refer to the Notice of Initiation on the [public file](#).

Completing this form

To register to this case, you need to provide two copies of your response to this form: a confidential and a non-confidential version. Your non-confidential version should be as similar as possible to your confidential version except for the redaction of the confidential information, or in exceptional circumstances, a statement of reasons why the information could not be meaningfully summarised.

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

The non-confidential version of your registration form may be placed on the [public file](#).

It is your responsibility to ensure that the non-confidential version does not contain any confidential information, which includes personal contact information, names and signatures.



Please see the [TRA's public guidance](#)¹ for further information on providing confidential information and non-confidential summaries.

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

Request to complete a detailed questionnaire

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

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

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

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



Section A: About your company

A1. Contact and company information

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

Name (point of contact):	[REDACTED – personal contact information]
Address:	Tangier, Kingdom of Morocco
Email:	[REDACTED – personal contact information]
Website:	Not applicable

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

Legal name of the organisation:	Sumilon Eco PET SARL
Other operating names:	Sumilon Eco PET
Legal structure (e.g., limited company, sole trader, state-owned etc):	Private limited liability company (SARL)
Location of company's primary activities (country):	Morocco
Countries you operate in:	Morocco; exports internationally
Year of establishment:	2013
Position in the organisation:	Founder & CEO / Managing Director

2. Please explain your interest in this investigation.

Sumilon is a Moroccan producer and direct exporter of 100% post-consumer food-grade recycled PET (rPET) within the goods concerned. Sumilon exported the goods concerned directly to end customers in the UK during the POI and is therefore an interested overseas producer/exporter. Sumilon seeks to ensure that the TRA accurately assesses Morocco's negligible and declining contribution to UK imports, the developing-country low-volume exporter provisions, and the distinct economic relevance of food-grade rPET.

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

Sumilon is not relying on membership of any representative organisation for purposes of this registration.



A2. Your company's activities

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

Overseas producers and exporters

- ☒ [A2.1] During the POI, we both produced and directly/indirectly exported the goods concerned to the UK.
Note: Please complete sections A3, A4, and B.
- ☐ [A2.2] During the POI, we produced the goods concerned, but did not export to the UK.
Note: Please complete sections A3 and B.
- ☐ [A2.3] During the POI, we directly/indirectly exported the goods concerned to the UK, but did not produce the goods concerned.
Note: Please complete sections A4 and B.

UK producers and importers

- ☐ [A2.4] During the POI, we produced goods that are like the goods concerned in the UK and imported the goods concerned to the UK.
Note: Please complete sections A5, A6, and B.
- ☐ [A2.5] During the POI, we produced goods that are like the goods concerned in the UK (i.e. the UK like goods), but we did not import the goods concerned or like goods.
Note: Please complete sections A5 and B.
- ☐ [A2.6] During the POI, we imported the goods concerned to the UK, but we did not produce the goods that are like the goods concerned (the UK like goods).
Note: Please complete sections A6 and B.

Other

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

2. Indicate whether your company is a member of any representative organisations (e.g. a trade body or chamber of commerce). If so, provide a copy of any relevant documentation.



A3. Production and domestic sales of the goods concerned

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

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

100% post-consumer, food-grade recycled poly(ethylene terephthalate) (rPET) resin with viscosity number of 74 ml/g or higher, principally classified under 3907 6100 for Sumilon's UK exports during the POI. Sumilon did not export goods under 3907 6900 to the UK during the POI.

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	72,500–77,500	72,500–77,500	77,500–82,500	77,500–82,500	82,500–87,500
Capacity	80,000–90,000	80,000–90,000	80,000–90,000	80,000–90,000	80,000–90,000

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
None relevant to this registration	—	—	—

+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).

Not applicable. Sumilon is the producer and exported the goods concerned directly to end customers in the UK; no unrelated wholesaler or intermediary was used.

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]	0	0	0	0	0
Value [£]	£0	£0	£0	£0	£0

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.

No specific material input-cost fluctuation is relied upon for registration purposes. Sumilon can provide further cost information if requested by the TRA.



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)?

Sumilon is not relying on any UK related-party relationship for purposes of this registration.

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

None identified for purposes of this registration.



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)
Not applicable – Sumilon is the producer	Tangier, Morocco	Same company	Y

+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	8,000–10,000	£13.7m–£16.8m
3907 6900	0	£0

Indirect exports		
Commodity Code	Export volume (POI) [tonnes]	Export value (POI) [£]
3907 6100	0	£0
3907 6900	0	£0

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.

All reported export values are on a CIF UK basis. Sumilon's underlying CIF sales values were denominated in EUR. For this registration form, the POI total was converted to GBP using the Bank of England annual-average EUR/GBP rates for the relevant years (2021: £1 = €1.1633; 2022: £1 = €1.1732; 2025: £1 = €1.1673).

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

Virgin PET: 0%. Recycled PET (rPET): 100%.

5. If you exported the goods concerned to the UK via third parties, please provide details for these parties below.

Company name	Company location (city, country)	Activities	Relationship
Not applicable – no third-party exporter	—	—	—

+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



Not applicable – Sumilon registered under A2.1 as an overseas producer/exporter.

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).

Not applicable – Sumilon registered under A2.1 as an overseas producer/exporter.

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.

Not applicable – Sumilon registered under A2.1 as an overseas producer/exporter.

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)?

Not applicable – Sumilon registered under A2.1 as an overseas producer/exporter.



A6. UK imports of the goods concerned

Not applicable – Sumilon registered under A2.1 as an overseas producer/exporter.

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.

Not applicable – Sumilon registered under A2.1 as an overseas producer/exporter.

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					
3907 6900					
Value [£]					
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 imports have not been reported on a CIF basis, please explain the basis on which they have been reported.

Not applicable – Sumilon registered under A2.1 as an overseas producer/exporter.

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

Not applicable – Sumilon registered under A2.1 as an overseas producer/exporter.

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

+Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with our [guidance](#).

6. Please specify your purpose in importing the goods concerned. Select **all of the following options that are applicable to your company**.

- ☐ We resell the goods unchanged to distributors or final customers.
- ☐ We process the goods before reselling them to distributors or final customers.
- ☐ We use the goods as input in our production of _____.
(specify the product/s).
- ☐ We reexport the goods to third countries, namely _____
- ☐ Other.

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

Not applicable – Sumilon registered under A2.1 as an overseas producer/exporter.



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

Not applicable – Sumilon registered under A2.1 as an overseas producer/exporter.

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.

Not applicable – Sumilon registered under A2.1 as an overseas producer/exporter.

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.

Not applicable – Sumilon registered under A2.1 as an overseas producer/exporter.

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

Not applicable – Sumilon registered under A2.1 as an overseas producer/exporter.

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

Not applicable – Sumilon registered under A2.1 as an overseas producer/exporter.

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

Not applicable – Sumilon registered under A2.1 as an overseas producer/exporter.

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

Please answer here

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.

Please answer here

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

Please answer here



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.

Please answer here

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?

Please answer here

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.

Please answer here

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.

Please answer here

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

Please answer here

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.

Please answer here



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)
Not provided at registration stage	Not provided	Not provided	UK / third countries

+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)
Downstream	UK end customers – details available to TRA on request under confidentiality procedures	Not provided in non-confidential registration	United Kingdom

+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.

No additional companies are identified at this registration stage. Sumilon can provide relevant company details to the TRA if requested, subject to confidentiality requirements.



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.

Sumilon does not request removal of PET from the investigation scope at the registration stage. However, Sumilon requests that the TRA separately collect and analyse data for virgin PET and recycled PET, particularly 100% post-consumer food-grade rPET, because recycled content has distinct regulatory, sustainability, availability and downstream economic significance.

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.

Sumilon's goods are 100% post-consumer food-grade rPET. Although vPET and rPET may be technically substitutable in some applications, rPET provides recycled content that vPET cannot provide. This is commercially important to customers seeking high recycled-content packaging and is relevant to UK Plastic Packaging Tax and circular-economy requirements. The TRA should therefore examine rPET availability, quality, food-contact requirements and price formation separately where appropriate.

B3. Investigation

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

Official HMRC data show that combined UK imports under 3907 6100 and 3907 6900 increased substantially during the POI. However, Morocco did not participate in that increase. Moroccan dispatches fell from 3,965.7 tonnes in 2021 and 4,950.0 tonnes in 2022 to zero in 2023 and 2024 and only 31.9 tonnes in 2025. Morocco had no UK imports under 3907 6900 throughout 2021–2025. Sumilon confirms that its internal UK shipment records reconcile with these official Moroccan volumes.

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.

The TRA should distinguish the sources and causes of any serious injury. Relevant factors include global capacity expansion and trade diversion from major producing regions; competition among third-country and UK producers; demand and consumption patterns; energy and raw-material costs; environmental regulation and recycled-content requirements; technology and productivity; and UK producers' export performance. Morocco's sharply declining and negligible imports cannot reasonably be characterised as a material contributor to the import increase.

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.

A safeguard could raise UK PET prices, reduce supplier choice and restrict access to food-grade recycled-content resin for UK converters and packaging users. The Economic Interest Test should consider the availability of UK-produced food-grade rPET, customer recycled-content requirements, Plastic Packaging Tax exposure, security of supply and circular-economy objectives. Morocco's 2025 share of combined investigated imports was approximately 0.010%, so restricting Moroccan supply would provide negligible relief while potentially eliminating a sustainable supply option.



B4. Other comments

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

Sumilon respectfully requests that the TRA: (1) assess Morocco under the developing-country low-volume exporter exception using country-of-origin data for the complete goods concerned; (2) disclose the individual 3% and collective 9% calculations; (3) record that Moroccan imports did not materially contribute to the increase during the POI; (4) separately analyse vPET and rPET where economically relevant; and (5) confirm whether the UK–Morocco Association Agreement provides any additional safeguard exemption. Sumilon remains willing to cooperate fully and provide supporting records subject to confidentiality procedures.

Consider redacting this information in your non-confidential version of this form, in accordance with our [guidance](#).