



Dumping Questionnaire (Importer) Case AD0087: Glass containers originating in the People's Republic of China (PRC)

Period of Investigation (POI):	1 January 2025 to 31 December 2025
Injury period:	1 January 2022 to 31 December 2025
Deadline for response:	21 May 2026
Contact details:	AD0087@traderemedies.gov.uk
Completed on behalf of:	Continental Bottle Co. Ltd

When you have completed this form, indicate the **confidentiality status** of this document by placing an X in the relevant box below:

- ☐ Confidential
☒ Non-confidential – will be made publicly available

Your completed response must comprise this questionnaire and the corresponding annex. Please note that you will have to provide a **Confidential** and a **Non-Confidential** version of both the questionnaire and annex, as well as any additional documents you append. All documents should be uploaded to the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **21 May 2026**.



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Introduction

About us, this case and this questionnaire

The Trade Remedies Authority (TRA) investigates whether trade remedies are needed to prevent injury to UK industry. The TRA has been established to provide the UK with its own independent trade remedies system.

This case is investigating the allegation that glass containers from the PRC are being dumped (exported to the United Kingdom (UK) at prices less than their normal value) and that this dumping is causing injury to the UK industry for these goods.

Why should I take part?

We are seeking your cooperation as a UK importer of the goods concerned to identify whether an anti-dumping duty may be required to counteract the effect of dumping.

The information your company provides will help us to reach a fair and proportionate decision. If information is not supplied within a reasonable time, the TRA will be free to make determinations on the basis of the facts available, including those contained in the application for the initiation of the investigation by the domestic industry.

To note, we use the term **company** in this questionnaire to cover all businesses including partnerships and sole traders.

How do I respond?

Detailed guidance on how to complete the questionnaire is provided in the [instructions](#) section below.

Please provide all the information requested by **21 May 2026**. We may need to issue a deficiency notice if we determine that the information supplied in the questionnaire is incomplete or inadequate. We may also send a notice requesting clarification or supplementary information if necessary. Therefore, please provide as much detail as possible in your responses.

Where can I find more information?

Our [trade remedies guidance](#) provides general information about our investigations and processes we follow.



If you have any specific questions relating to the case, now or while you're completing the questionnaire, please contact the Case Team at AD0087@traderemedies.gov.uk.

You can also find out more about the regulatory basis of our investigations. The TRA investigates cases under the provisions of *Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 as Amended by the Trade Remedies (Amendment) (EU Exit) Regulations 2019* and under the *Taxation (Cross-border Trade) Act 2018*.

Instructions on completing this questionnaire

Preparing your response

This section sets out guidance on how to complete this questionnaire.

If you think you won't be able to complete the questionnaire within the required time, please contact the Case Team ahead of the deadline using the contact details on the cover of this questionnaire. You should outline the length of extension you need and the reasons why. We will notify you of our decision.

If we can accommodate an extension, we will publish a note on our [public file](#) to record both the request and the extension granted.

How to answer the questions

Please read and follow all the instructions carefully. Your company will need to substantiate all claims with relevant data and information. You may be asked to attach supporting documents in appendices to supplement your responses. To help us verify your information, please retain all these documents, your completed spreadsheet annex and any calculations you made when developing your responses.

Please also note the following points:

- Do not leave any questions blank. If the question is not relevant to your organisation, please explain why.
- If the answer to a question is "zero", "no" or "none", please write this rather than leaving the answer blank.
- Please complete the spreadsheet annex as requested. Annex are named to correspond to the relevant sections of this questionnaire and must be completed with reference to the instructions provided. If you feel you cannot present the information as requested, please contact your Case Team as soon as possible.
- Please provide all formulas and calculations used within your questionnaire response.



- If there is insufficient space in any part of the questionnaire to provide the details requested, or we ask for copies of additional information, please submit this information as appendices. Please ensure that any attachments are given a corresponding appendix reference in the title of the document and that these are referenced in the boxes provided.
- Any documents not in English should be accompanied by an English translation.
- Please provide all dates in the format DD/MM/YYYY (e.g., 23/05/2023).
- Unless otherwise stated, 'year' or 'calendar year' refers to the period 1 January – 31 December and 'quarter' refers to the associated three-month periods (e.g., 1 January – 31 March, 1 April – 30 June, etc).
- Identify all units of measurement and currencies used in tables, calculations and lists, if not provided by the corresponding instructions, and use units of measurement consistently (e.g., do not use kg and metric tonnes interchangeably).
- For all numerical figures, where appropriate please express every third number with a comma (e.g., '1,300' for one-thousand three hundred, '1,300,000' for one million and three-hundred thousand).
- Please limit all sales/currency/income figures to two decimal places, apply a full point as a decimal separator and use the appropriate currency symbol or abbreviation (e.g., £1,300.00).
- Provide all costing figures as actual amounts. Where actual amounts cannot be provided and you have reported standard costing instead, please indicate this in the relevant answer, and explain the variance from actual costs, if any.
- All figures should be reported net of tax unless otherwise stated.
- Please refer to the case number, **AD0087**, in any correspondence with the TRA.

Preparing confidential and non-confidential copies

You will need to submit one confidential version and one non-confidential version of your questionnaire and the corresponding spreadsheet annex by the due date. We will publish the non-confidential version on the public file. **Please ensure that each page of information you provide is clearly marked either “Confidential” or “Non-Confidential” in the header.**

Please see our guidance on [how to submit information](#) for further details on what can be considered confidential and how to prepare a non-confidential version of this questionnaire.

In preparing your response, please note the following:

- It is your responsibility to ensure that the non-confidential version does not contain any confidential information.
- Remember to include a statement explaining why information obtained in your response should be treated as confidential (e.g., the data is commercially sensitive).



- Provide the source for all information or data you don't own and clearly state any restrictions on sharing it.
- If you do *not* provide a non-confidential summary (or a statement of reasons why you cannot provide this) each time you provide confidential information, the TRA may disregard the information you give us.

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 46 of the *Trade Remedies (Dumping and Subsidisation) (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, which is available on <https://www.trade-remedies.service.gov.uk/public/case/AD0087/>.

Providing information from subsidiaries or associated parties

Section A of this questionnaire includes detailed questions about your company structure. Although this questionnaire is intended for your company, our investigation covers all subsidiaries and any other associated companies involved in the import, production, sale, R&D, distribution and/or supply of the like good and/or goods concerned.

Please note, 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](#).

- If any of your subsidiaries or associated companies are also a UK importer of the goods concerned or the like goods, they should **also** complete an Importer questionnaire. Please make sure you provide your subsidiaries with access to it.
- If your subsidiaries or associated companies are not UK importers but are involved in the downstream sales of the goods concerned or the like goods, your questionnaire response should include information from those companies.

If you have any queries about this part of the process, please contact the Case Team using the details provided on the cover of this questionnaire.

What happens next

Once you have completed your questionnaire responses including the corresponding annex and any additional documents requested, you must upload confidential and non-confidential versions through our [Trade Remedies Service](#). Following this:

- you will receive an email confirming the documents have been uploaded successfully;
- the Case Team will contact you if further information is required
- the non-confidential responses will be placed on the public file; and
- the Case Team may contact you to arrange a visit to verify the information contained in your responses.



Verifying the information you supply

The TRA will verify, as far as possible, the information provided to us. As part of this process, we may conduct verification visits. If we need to verify information that you provide by visiting your premises, the Case Team will contact you to arrange this.

Visits can last several days, during which we will want to speak to management and staff to help establish the completeness, relevance and accuracy of the information provided.

Please keep a record of formulas and steps used in your calculations and other related material/documentation as it may be asked for during verification.

In some circumstances, verification may be conducted remotely.

Once verification is complete, the TRA will prepare a report and share a draft with you. We will then ask you to prepare a non-confidential copy of the report for the public record. If you feel some information in the report should be kept confidential, please provide your reasons for this.





The scope of this investigation

Goods concerned

This **investigation** covers glass containers exported from **the PRC**, described as:

Carboys, bottles, flasks, jars, pots, phials, preserving jars, and other containers, of glass, of a kind used for the conveyance or packing of goods; whether or not including a closure. Not including ampoules; containers made of tubular glass; glass containers with a nominal capacity of 2.5 litres or more; or standalone stoppers, lids, or other closures of glass.

These **glass containers** are currently classifiable within the following commodity code(s):

70 10 90 10 00	70 10 90 51 00	70 10 90 67 00
70 10 90 41 00	70 10 90 53 00	70 10 90 71 00
70 10 90 43 00	70 10 90 55 00	70 10 90 79 00
70 10 90 45 00	70 10 90 57 00	70 10 90 91 00
70 10 90 47 00	70 10 90 61 00	70 10 90 99 00

These codes are only given for information.

In this questionnaire, these goods will be referred to as '**the goods concerned**'. Any reference to goods 'concerned' in this questionnaire refers to the goods description above, regardless of the commodity code under which they are exported.

Like goods

This questionnaire asks for information about your company's sales and distribution of goods which are like the goods concerned. Any reference to '**like goods**' in this questionnaire refers to goods which are like the goods concerned in all respects, or with characteristics closely resembling them.

Please follow the instructions for each question to provide the appropriate information.

Product Control Numbers

The TRA uses Product Control Numbers (PCNs) to define and distinguish the different types of products that fall under the goods description above.

PCNs, which come in the form of an **alphanumeric code**, help to create a categorisation system so that comparisons can be made between goods produced in the domestic UK market and those produced in foreign markets.

In this questionnaire and the corresponding annex, you will be asked to assign PCNs representing the different types of products you import. When stating your PCNs,



please do not use any spaces, dashes or other means of separation, and ensure you follow the order of characteristics outlined in the table below. Please use this PCN structure consistently throughout your questionnaire response, including the corresponding spreadsheet annex.



Category	Code	Description
Glass colour	P	Colourless (premium / extra white flint)*
	S	Colourless (standard flint)
	C	Coloured glass (furnace tank)
	D	Coloured glass (feeder colour additive)
Nominal capacity	A	0-24 ml
	B	25-49 ml
	C	50-74ml
	D	75-99 ml
	E	100-199ml
Weight	F	200-299ml
	G	300-399ml
	H	400-499ml
	I	500-599ml
	J	600-699ml
Includes external (post-consumer) cullet	K	700-799ml
	L	800-899ml
	M	900-999ml
	N	1,000-1,499 ml
	O	1,500-2,499ml
Food assured	A	0-24 g
	B	25-49 g
	C	50-74 g
	D	75-99 g
	E	100-149 g
Pharmaceutical assured	F	150-199 g
	G	200-249 g
	H	250-299 g
	I	300-349 g
	J	350-399 g
Pressure assured	K	400-449 g
	L	450-499 g
	M	500-549 g
	N	550-599 g
	O	600g and above
Volumetric assured	A	Yes, up to 24%
	B	Yes, 25-49%
Container type	C	Yes, 50-74%
	D	Yes, 75% and above
Container design	F	Yes (assured safe for use in food products)
	N	No (not food assured)
Post furnace decoration	P	Yes (assured for use as a pharmaceutical container)
	N	No (not assured as a pharmaceutical container)
Supplied with lid / closure	P	Yes (assured safe for pressurised goods (e.g. carbonated beverages))
	N	No (not assured safe for pressurised goods)
Container type	V	Yes (assured for use as a volumetric container)
	N	No (not assured as a volumetric container)
Container design	B	Bottle (narrower neck than body)
	J	Jar / ramekin (wide neck)
	O	Other
Post furnace decoration	S	Standard / generic / non-branded
	N	Non-standard / bespoke / complex (e.g. shaped / embossed) / specialist (e.g. perfume bottle)
Supplied with lid / closure	A	Painted / sprayed / printed / metallised
	B	Labelled, sleeved
	C	Other / multiple
	N	Not decorated
Supplied with lid / closure	Y	Yes
	N	No

* Extra-white flint can be defined by its low iron content and colour using the following definition developed for the EU Emissions Trading Scheme.

"An iron oxide content expressed as percent Fe₂O₃ by weight lower than 0.03% and colour co-ordinates of L in



the range 100 to 87, of a in the range 0 to -5 and of b in the range 0 to 3 (using the CIELAB advocated by the Commission Internationale d'Éclairage)."

Some examples of products and their corresponding PCNs are below:

- An amber pharmaceutical bottle (coloured via the furnace tank) with a nominal capacity of 50ml, weighing 40g, with a standard design and not provided with decoration. This good would be food assured and pharmaceutically assured but not volumetrically assured, and not suitable for use with pressurised products. This good was manufactured using 20% external cullet and is supplied with a lid.
= CCBA FPNN BSNY
- A standard flint (clear) food jar with a nominal capacity of 250ml, weighing 202g with a standard generic design and provided with an adhesive label at the factory. This good is not assured for use with foods, pharmaceuticals or pressurised goods. It is not volumetric, was not manufactured using external cullet, and is not supplied with a lid.
= SFGN NNNN JSBN
- An amber beer bottle (coloured via the furnace tank) with a nominal capacity of 500ml, weighing 290g, with a bespoke moulded design, volumetric assurance, usable for pressurised goods and foods but not pharmaceuticals, with a direct printed label and a single colour spray coating. This good was produced using 15% external cullet and is supplied with a lid.
= CIHA FNPV BNCY

(In this questionnaire and the corresponding annexes, you will be asked to construct PCNs representing the different types of products you produce. When giving your PCNs, please use spaces (but no dashes or other means of separation) between the three sections of characters, and ensure you follow the order of characteristics outlined in the table above)

1. Please provide details of any technical or physical characteristic not included in the PCN structure that may affect the price comparison between products.

The current Product Control Number (PCN) structure does not fully capture a number of important technical and physical characteristics that materially affect price comparability between products. In particular, it does not adequately distinguish the types of highly specialised perfume and fragrance bottles supplied by our business from the more standardised glass containers typically produced by UK manufacturers.

There are several characteristics which are not sufficiently reflected in the PCN but which have a direct impact on both price and product comparability:

Neck finish and closure compatibility: Specialist finishes such as FEA15, SNI15 and CNI15 are essential for perfume and fragrance applications, as they must interface precisely with pumps and atomisers. These finishes require tighter tolerances and different manufacturing processes compared to standard finishes used in food,



beverage or pharmaceutical containers. We are not aware of UK production of these finishes at the required specification and scale.

Glass quality and aesthetic standards: Perfume bottles require significantly higher levels of clarity, weight consistency, cosmetic finish, and defect control than other container types. The visual appearance of the bottle is a key part of the end product. This increases both production complexity and cost, and differentiates these goods from general-purpose containers that the UK industry primarily supplies.

Design complexity and degree of customisation: Many of the products we supply are bespoke, incorporating unique shapes, heavy base designs, engraving, coating, or decoration. These design features require specialised tooling and shorter production runs. The PCN structure does not distinguish between standard and highly customised designs, yet this is a key driver of price.

Minimum order quantities (MOQs) and batch sizes: The products we supply are often manufactured in relatively small volumes to meet the needs of small and medium-sized enterprises (SMEs) operating in the fragrance and cosmetics sectors. UK manufacturers typically operate at substantially higher MOQs, which significantly affects unit pricing and makes direct comparisons inappropriate.

Tooling and set-up costs: For bespoke designs, the cost of tooling is a material component of the overall price. Where production runs are small, these costs are amortised over fewer units, increasing the unit price. This economic factor is not captured in the PCN structure.

Lead times and production flexibility: The ability to produce shorter runs with flexible lead times is a defining feature of the imported products. UK manufacturers generally operate longer lead times and prioritise high-volume production, which again affects both price and availability.

These characteristics are not minor variations; they fundamentally differentiate the products in terms of both technical specification and market use. As a result, products supplied by our business are not directly comparable to those produced by UK manufacturers.

2. Please comment on the suitability of the PCN structure in regard to your product range. This may include areas such as:
 - Categorisation of features
 - Number of Products included under “Other” which may exclude a fair comparison
 - Specialised products which may unduly influence the comparison

The current Product Control Number (PCN) structure is not well suited to our product range. In practice, a large proportion of our items are categorised under “Other” for container design. This is because the existing structure does not provide



sufficient detail to distinguish highly specialised perfume and fragrance bottles from standard glass containers used in food, beverage or pharmaceutical applications. As a result, the PCN structure does not enable a fair or meaningful comparison of products.

Our product range includes a significant number of bespoke items, many of which incorporate complex designs such as embossing, unique shapes, and decorative features. These are not standardised products. They are developed for individual customers and are often exclusive to a particular brand. In many cases, the design, weight, finish and decoration are tailored to specific marketing and aesthetic requirements, which are central to the value of the final product.

These characteristics are not adequately captured within the current PCN categories. In particular:

Extent of customisation: The PCN does not distinguish between standard, mass-produced containers and highly customised, customer-specific designs. This is a key omission, as bespoke products require different manufacturing processes, tooling and cost structures.

Embossing and decorative features: Many of our products include embossed branding, coatings or other decorative elements. These materially increase complexity and cost but are not separately identified within the PCN.

Production model and volumes: Our products are typically produced in small batches, reflecting the requirements of niche fragrance and cosmetics brands. By contrast, UK manufacturers generally operate high-volume, high-speed production lines. The PCN does not capture these differences in batch size or production approach, which have a direct impact on price.

Quality and finish requirements: Our customers prioritise high quality, including clarity, consistency, and cosmetic finish, over high-volume output. This differentiates these products from standard containers and is not sufficiently reflected in the current classification.

Because of these limitations, products that are fundamentally different in both technical specification and commercial context are grouped together under broad categories such as “Other”. This risks drawing price comparisons between products that are not comparable in practice.

These differences are significant when considering whether there are “like goods” produced in the UK. In our experience, UK manufacturers do not offer products that match the combination of bespoke design, small batch production, specialist features (including embossing), and high aesthetic standards required by our customers. UK production is generally focused on larger volumes of standardised containers, with higher minimum order quantities and less flexibility for niche designs.



This has clear implications for the Economic Interest Test:

Availability of supply: There is no meaningful UK supply of equivalent products. Customers requiring bespoke, small-run, design-led bottles cannot source comparable goods domestically.

Impact on SMEs: Many of our customers are small and medium-sized enterprises operating in the fragrance, cosmetics and craft sectors. They rely on small production runs and differentiated packaging. If imports were restricted, these businesses may be unable to source suitable products at workable volumes or cost.

Competition and consumer choice: Our products support a diverse and competitive downstream market. Limiting imports would reduce design choice and restrict the ability of smaller brands to compete.

Pricing: Given the lack of comparable UK production, anti-dumping measures would not protect a domestic producer of like goods. Instead, they would increase input costs for downstream businesses.

Risk of supply concentration: Restricting access to imports would concentrate supply among a small number of UK manufacturers that do not currently meet these requirements. This would reduce resilience and increase supply risk.

In summary, the current PCN structure does not adequately reflect key product features within our range, particularly the high number of bespoke, embossed and customer-specific items that fall under "Other". These are not minor variations but fundamental differences. As a result, the structure does not allow for a fair comparison and does not support the conclusion that there are like goods produced in the UK.

3. Please provide details of any manufacturing process differences which you feel may influence the PCN structure and the price comparison between the goods concerned and the like goods.

There are important differences in manufacturing processes between the products we supply and those typically produced by UK manufacturers. These differences are not fully reflected in the current PCN structure, yet they have a direct and material impact on both price and product comparability.

UK glass producers generally operate high-volume, high-speed production lines. Typical output levels are in the range of 50,000 to 70,000 units per day, with minimum order quantities (MOQs) often between 150,000 and 300,000 units. These operations are designed for standardised products, where efficiency is driven by scale. As a result, tooling and set-up costs are relatively high, typically in the region of £15,000 to £45,000 per design. Quality control in these environments relies heavily on automated camera systems to detect defects at speed, which is



appropriate for large-scale, consistent production but less suited to highly customised, design-led items.

In contrast, the products we supply are manufactured using processes specifically adapted for bespoke perfume and fragrance bottles. These processes differ in several key respects:

Production scale and output: Our manufacturers operate smaller, more flexible production lines, typically producing [Confidential – Contains business confidential information. Figures not susceptible of summarisation in the form of ranges without disclosing confidential information. Non-confidential summary: significantly lower than the typical output levels of UK glass producers.] units per day. This allows for greater control over individual items and supports the production of niche, customer-specific designs.

Minimum order quantities: We are able to offer significantly lower MOQs, in some cases as low as [Confidential – Contains business confidential information. Figures not susceptible of summarisation in the form of ranges without disclosing confidential information. Non-confidential summary: significantly lower than the typical MOQs of UK glass producers.]. This is essential for our customer base, which includes many small and medium-sized enterprises requiring shorter runs and more frequent product development cycles.

Tooling and set-up: Tooling costs are substantially lower, typically between £1,000 and £5,000. This reflects the use of [Confidential – Contains business confidential information] and enables the production of bespoke designs, including embossed and decorative features, without prohibitive upfront costs.

Manufacturing approach: Production is often semi-automatic rather than fully automated. This allows operators to adjust processes in real time to maintain high aesthetic and dimensional standards, particularly for complex or unique designs.

Quality control: In addition to standard checks, there is a significant element of manual inspection, with individual bottles assessed to ensure they meet the higher cosmetic and quality expectations of the perfume sector. This level of scrutiny is not feasible on high-speed, high-volume lines and is a key factor in achieving the required finish.

These process differences are fundamental rather than incremental. They lead to different cost structures, different types of products, and different market applications. In particular, they enable the production of high-quality, design-led, often customer-exclusive bottles that are not produced by UK manufacturers.

As a result, the goods concerned cannot be considered directly comparable. The PCN structure does not currently differentiate between high-volume, standardised production and small-batch, bespoke manufacturing processes, nor does it capture the associated differences in cost drivers and quality outcomes.



This distinction is also relevant to the Economic Interest Test:

Availability of supply: UK manufacturers do not operate production systems suited to small-batch, highly customised, design-led bottles. There is therefore no meaningful domestic supply of equivalent goods.

Impact on SMEs: Many customers in the fragrance and cosmetics sectors depend on low MOQs and flexible manufacturing. Without access to these supply models, they would face significant barriers to entry and growth.

Competition and consumer choice: The ability to produce unique, branded bottles in smaller volumes supports a diverse and competitive market. Restricting access to such products would reduce innovation and limit consumer choice.

Pricing: The cost differences arising from manufacturing processes mean that price comparisons with high-volume UK production are not appropriate. Anti-dumping measures would not protect a comparable domestic industry but would instead increase costs for downstream users.

Risk of supply concentration: Limiting imports would concentrate supply among a small number of high-volume UK producers that do not meet these requirements, increasing supply chain risk and reducing resilience.

In summary, the differences in manufacturing processes are central to understanding both price and product comparability. They support the conclusion that the bespoke perfume and fragrance bottles we supply are not “like goods” to those produced in the UK, and that the current PCN structure does not adequately reflect these distinctions.



SECTION A: Company structure and operations

A1 Identity and contact details

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

Legal name of company:	Continental Bottle Company Limited
Legal structure (e.g., limited company, etc):	Limited Company
Year of establishment:	1991
Other operating names:	None
Company registration number:	02606480
Place of registration:	United Kindgom
Name (point of contact):	[Confidential – Contains confidential information]
Position:	[Confidential – Contains confidential information]
Address:	Unit 4 Barlow Drive, Woodford Park Industrial Estate, Winsford, Cheshire, CW7 2JZ, UK
Telephone No:	[Confidential – Contains confidential information]
Email:	[Confidential – Contains confidential information]
Website:	www.continentalbottle.co.uk

2. If you have appointed an external party to act on your behalf in this investigation, please provide their details and attach a letter of authority confirming the TRA should contact them directly.

Name:	Hogan Lovells
Address:	Atlantic House, Holborn Viaduct, London EC1A 2FG
Telephone No.:	(+32) 2 505 0911
Email:	byron.maniatis@hoganlovells.com
Confirm they have signed authority to act (Yes/No):	Yes
Appendix reference: A1.2 signed POA	

A2 About your company



1. Please describe the role of your company, in the UK market, for the like goods and/or goods concerned, (e.g., buying or selling agent, importer/distributor, importer/wholesaler, importer/retailer or importer/end user).

Importer / Distributor
Appendix reference:

2. Please provide details of any changes in the legal form of your business over the past 5 years , for example, mergers, acquisitions and/or sales.

Date	Legal form	Explanation of change
09/05/2022	Unchanged	Acquisition by TricorBraun Limited

+Add additional rows as required.

3. List and explain all authorisations your company has been required to obtain to import, sell or distribute the goods concerned and the like goods. These may include licences, permits or permissions. Indicate if your company is subject to any direct or indirect, quantitative or other, restrictions on any of these activities.

None
Appendix reference:

4. State whether your company is a member of any representative organisations. If so, provide a copy of the relevant documentation.

None
Appendix reference:

A3 Organisational structure

1. Please complete **Annex: A1) Associated companies** for your company's worldwide corporate structure and affiliations.

Please see additional notes in the annex for assistance on how to complete it.

2. Please explain, or demonstrate in a diagram, the legal structure of your company showing the internal hierarchical and organisational structure, all sites/locations and departments which are involved in the production, sales, R&D, supply and



distribution of the like goods for domestic and export markets. Clearly indicate the different production stages carried out by your company, if any.

Org chart for business structure included.
Org chart for personal attached – breakdown by department.
Appendix reference: Appendix_TRA_AD0087_A3

A4 Board members and principal shareholders

1. Please complete **Annex: A2) Owners & Shareholders**.
2. Please complete the table below for any shareholder with >5% holding in the company who also has interest in any organisation related to the production, marketing, administration, and sale of the like good in the UK or the PRC.

Name	Shareholding in company	Name of Other Companies in which person holds interest	Activity of other companies
TricorBraun Limited	100%	Neville & More Ltd	Distribution

+Add additional rows as required

3. Please complete the table below for any members of the Board of Directors who also has interest in any organisation related to the production, marketing, administration and sale of the like good in the UK or the PRC.

Name	Position on Board of Directors	Name of Other Companies in which person holds interest	Activity of other companies
EBS Corporate Services	Secretary	Neville & More + Tricorbraun Limited	Distribution
Michael John Doyle	Managing Director	Neville & More	Distribution
Matthew Hirst	Director	Neville & More + Tricorbraun Limited	Distribution
Scott David Jamroz	Director	Neville & More + Tricorbraun Limited	Distribution



Chad William Kibler	Director	Neville & More + Tricorbraun Limited	Distribution
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+Add additional rows as required

A5 Operational links with other companies or persons

1. Complete the table below if your company has established long-term agreements and/or relationships with any company/companies located in the UK, the PRC. or in third countries for the production (e.g., sub-contracting), supply and sale of the like goods, or other licensing, technical patent or compensatory agreements

If your company has long-term agreements with other companies for the supply of goods destined for internal sale, (e.g., captive use), please provide the contract to demonstrate this.

Name	Position on Board of Directors	Name of Other Companies in which person holds interest	Activity of other companies
None			

+Add additional rows as required

A6 Accounting practices

1. Give the address where your company's accounting records are kept. If records are maintained in different locations, please indicate which records are kept at which location. If records are digital and do not have a physical location, please mark as N/A.

Records address	What records are held?
N/A	

+Add additional rows as required

2. Please give the financial year convention your company uses for its accounts (e.g., 1 January – 31 December). If any changes have occurred with respect to this period or in your accounting practices over the last five financial years, please describe these changes.

CB was acquired by TricorBraun on May 9 th , 2022.



Our accounting period prior to this was to Year End 31st July. This was changed in 2022, to align with group year end when we changed to 1st Jan to 31st December. Our first full year was 01/01/2023 to 31/12/2023 with this accounting period.

Appendix reference:

3. For your company and any associated parties involved in the production, marketing, or sales of your goods, please attach a copy of your annual reports, covering the injury period, including the financial statements and audit report.

2025 currently being audited, Year End 2025 Sage P&L attached.

Appendix reference:

1. CB Nominal Ledger Trial Balance Dec 25
2. CB Profit and Loss Report Dec 25

4. If your accounts are unaudited, please attach a copy of your unaudited financial statements for the injury period.

Accounts are being audited. Attached unaudited accounts.

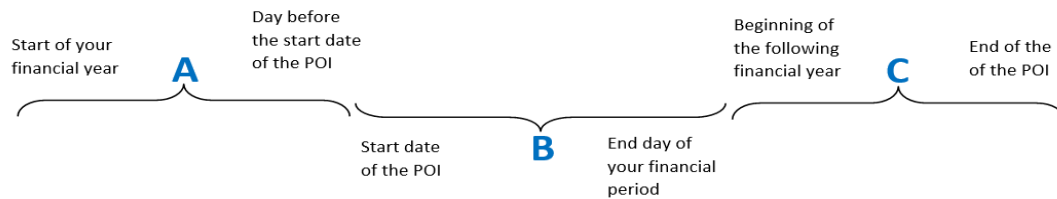
Appendix reference:

1. CB Nominal Ledger Trial Balance Dec 25
2. CB Profit and Loss Report Dec 25

5. Please attach a copy of your company's trial balance (in original and spreadsheet form) covering the POI (1 January 2025 – 31 December 2025). If your financial year is fully aligned with the POI, this is all that is required.

Where your financial period is not aligned with the POI, please provide trial balances (in original and spreadsheet form) to cover the following periods:

- the trial balance which starts from the beginning of your financial year and ends on 31 December 2024;
- the trial balance which starts from 01 January 2025 to the end of your financial year; and
- the trial balance which starts from the beginning of your following financial year and ends on 31 December 2025.



TB and P&L attached for 2025

Appendix reference:

1. CB Nominal Ledger Trial Balance Dec 25
2. CB Profit and Loss Report Dec 25

6. For your company and any associated parties involved in the import, marketing or sales of the goods concerned, and the like goods, please attach copies of relevant management reports (e.g., profit and loss statement) for the profit centre that includes the goods and like goods. Please provide these reports for the (i) POI and (ii) most recently completed financial year.

TB and P&L attached for 2025

Appendix reference:

1. CB Nominal Ledger Trial Balance Dec 25
2. CB Profit and Loss Report Dec 25

7. If your company is part of a group of companies, please attach a copy of the consolidated accounts of the group for the most recently completed financial year.

Attached consolidated accounts to Dec 2024

Appendix reference:

companies_house_document_audited
accounts_YE2024.pdf

8. Please provide a detailed description of your financial accounting system, explaining how sub-ledgers (e.g., costing, debtors, creditors) and other sales or production systems integrate with the general ledger. Please provide a description of how it links to the management accounting system, including any manual interventions. Please also attach:



- your company's chart of accounts; and
- your company's cost centres.

We operate a fully integrated financial accounting system centered on a general ledger (GL), which is supported by a number of sub-ledgers and operational systems. These include:

[Confidential – Contains business confidential information]

Transactions are initially recorded within the relevant sub-ledger system and are automatically posted into the general ledger via nominal (GL) codes. Each transaction carries a defined nominal code that determines its accounting treatment and reporting classification.

Sub-ledger Integration

[Confidential – Contains business confidential information]

General Ledger Structure

All sub-ledgers are linked through nominal (GL) codes. These codes form part of a structured multi-segment chart of accounts, which typically includes:

[Confidential – Contains business confidential information]

Each nominal code is mapped to defined reporting categories, which determine whether the transaction is classified within:

- Profit & Loss account, or
- Balance Sheet

This ensures consistent financial reporting and alignment between statutory and management accounts.

Link to Management Accounting

The financial accounting system is closely integrated with the management accounting framework.

Key features:

- [Confidential – Contains business confidential information]

Manual Interventions

While core postings are automated, several manual processes exist, including:

- [Confidential – Contains business confidential information]

These manual steps ensure accuracy, completeness, and alignment with management reporting requirements.



Chart of Accounts (Attached)

Chart of Accounts is maintained as a structured list of nominal codes and descriptions.

Example entries include:

[Confidential – Contains business confidential information]

Each account is assigned:

- A description
- Organisational hierarchy levels
- Debit/Credit designation

All financial transactions are recorded using a consistent nominal coding structure, ensuring full integration between sub-ledgers, the general ledger, and management reporting. This enables accurate financial reporting, reconciliation, and robust internal analysis.

Appendix reference:

9. Have you changed your financial policies and/or accounting systems during the injury period? Please explain any changes, including dates and the reasons for those changes along with the financial impact of those changes on the goods concerned or like goods.

N/A

Appendix reference:

A7 Your company's products

1. Please complete **Annex: A3) Your company's goods**.

Please see additional notes in the annex for assistance on how to complete it.

2. Explain the internal coding system your company uses to classify your range of goods concerned.

Technical documentation (such as sales catalogues, safety standards, technical data, etc.) should be attached for each model where available.

We use product groups to differentiate between different product types.



As per the listing attached, the groups most closely related to AD0087 are:

[Confidential – Contains business confidential information] – W/Flint perfume bottles

[Confidential – Contains business confidential information] – Amber bottles

[Confidential – Contains business confidential information] – W/flint jars

[Confidential – Contains business confidential information] – Blue and Green bottles

[Confidential – Contains business confidential information] – Blue jars

[Confidential – Contains business confidential information] – Spirit bottles

[Confidential – Contains business confidential information] – Wine bottles

Attached technical drawings of the following bottles for reference by the TRA:

[Confidential – Contains business confidential information] 70cl – standard shape distillery bottle

[Confidential – Contains business confidential information] 50ml with FEA15 crimp neck and emboss detail

[Confidential – Contains business confidential information] 50ml with FEA15 crimp neck and emboss detail

Appendix reference:	
Product	Coding
Appendix_TRA_AD0087_A7.2	

3. If your company does not use the same product codes across imports, sales and invoicing, please explain how they differ.

Same coding structure
Appendix reference:

4. Please list all main categories of products produced and/or traded by your company and indicate
- . which category covers the goods concerned
 - . which incorporate the goods concerned or like goods

The following product groups cover the goods concerned: As per the listing attached, the groups most closely related to AD0087 are: [Confidential – Contains business confidential information] – W/Flint perfume bottles
--



[Confidential – Contains business confidential information] – Amber bottles
[Confidential – Contains business confidential information] – W/flint jars
[Confidential – Contains business confidential information] – Blue and Green bottles
[Confidential – Contains business confidential information] – Blue jars
[Confidential – Contains business confidential information] – Spirit bottles
[Confidential – Contains business confidential information] – Wine bottles

The following product group incorporates the goods concerned:

[Confidential – Contains business confidential information] – Finished Product – singles or gift sets

Appendix reference:

5. Indicate in the box below any physical, commercial, or functional differences between the like goods and the goods concerned. If these differences cause distinguishable variations in price, explain those differences and the effect they have. Attach any evidence you have that is relevant.

Pricing: The cost differences arising from manufacturing processes mean that price comparisons with high-volume UK production are not appropriate. Anti-dumping measures would not protect a comparable domestic industry but would instead increase costs for downstream users.

Risk of supply concentration: Limiting imports would concentrate supply among a small number of high-volume UK producers that do not meet these requirements, increasing supply chain risk and reducing resilience.

In summary, the differences in manufacturing processes are central to understanding both price and product comparability. They support the conclusion that the bespoke perfume and fragrance bottles we supply are not “like goods” to those produced in the UK, and that the current PCN structure does not adequately reflect these distinctions. Note the attached technical drawings where items 2 & 3 are not produced in the UK.

Appendix reference:
Appendix_TRA_AD0087_A7.5

6. Indicate the relevance of the incorporated goods concerned and/or like goods in relation to the finished product.



The incorporated product is a glass container used as the primary packaging for personal fragrances, including Eau de Parfum and Eau de Toilette, containing a mixture of fragrance compounds, colourants, ethanol and other ingredients.

Glass is an inert material that does not interact with the contents, thereby preserving product stability and integrity. It also contributes to the product's presentation as a premium packaging format.

Appendix reference:

A8 Suppliers of the imported goods

1. Please complete **Annex: A4) Suppliers - goods concerned**.

This tab asks you to provide contact details for each company that supplies you with the goods concerned. For each supplier that is not a manufacturer of the goods concerned, you will be asked to provide details of the manufacturer, if known.





SECTION B: Imports and forward orders

B1 Imports

1. Please complete **Annex: B1) Imports** by country for the injury period for the goods concerned and like goods. Please provide the information on a CIF basis if possible.

Please see additional notes in the annex for assistance on how to complete it

2. If your imports in **Annex: B1) Imports** have not been made on a CIF basis, please explain the basis on which they have been reported.

[Confidential – Contains business confidential information]

Appendix reference:

B2 Imports reconciliation

1. Please complete the Imports reconciliation table in **Annex: B2) Cost Reconciliation**.

Please see additional notes in the annex for assistance on how to complete it.

B3 Details of import transactions

1. Please complete the **Annex: B3) Import transactions**, providing transaction level details of imports of the goods concerned from the PRC during the POI.

Please see additional notes in the annex for assistance on how to complete it

2. Please provide invoices and any supporting documents for two of the transactions stated within **Annex: B3) Import transactions**. Use the box below to give an overview of any supporting documents provided.

Vendor invoice and freight invoice attached for two independent shipments of fragrance bottles from China factories.
--

Appendix reference: B3.2 CON[redacted]1_Invoice B3.2 CON[redacted]1_Freight



B3.2 CON[redacted]2_Invoice
B3.2 CON[redacted]2_Freight

3. Referring to the costs you stated in **Annex: B3) Import transactions**, for the goods concerned please indicate which costs were incurred by your company between frontier and arrival of the goods at your warehouse and categorise them as duties, import costs or post-import costs. Are these costs incurred as a percentage of the purchase price, or as a fixed amount per unit of the goods concerned?

Column Y – Freight costs will include costs for freight [Confidential – Contains business confidential information].

Columns AA to AF – are all UK charges applied to goods [Confidential – Contains business confidential information].

Appendix reference:

B4 Forward orders

1. Please provide details in **Annex: B4) Forward orders** and attach copies of forward contracts/ongoing supply agreements for the goods concerned for up to one year ahead. Comment on these forward contracts – are they a usual way of doing business in your industry? Has there been any variation in the volume and value of forward contracts over time? If so, what has caused this variation?

Attached PO copies of example POs

POs are a standard way of doing business.

[Confidential – Contains business confidential information]

Appendix reference: B4 - PO_[redacted]1
& B4 - PO_[redacted]2





SECTION C: Sales and selling expenses

C1 Sales of the goods concerned

1. Please complete **Annex: C1) Sales**. Provide annual sales figures for the goods concerned imported from the PRC and the like goods from all other countries imported into the UK by your company. Please state the value and quantity of these goods sold in the UK or re-exported during the injury period. Where known and if applicable, please state each source country of the like goods.

C2 Sales reconciliation

1. Please complete the Imports reconciliation table in **Annex: C2) Sales reconciliation**.

Please see additional notes in the annex for assistance on how to complete it.

C3 Sales of goods incorporating the goods concerned and/or like goods

1. If applicable, please complete **Annex: C3) Sales incorporating the goods concerned or like goods**, providing information on the value and volume of goods produced by your company incorporating the goods concerned or like goods, where the good concerned or like goods are sourced from the PRC and all other countries and the end product is sold in the UK or exported.

C4 Sales transactions

1. Please complete **Annex: C4) Sales transactions**. Please provide the requested information for the goods concerned you sold on the UK market during the POI.
2. Please provide invoices and any supporting documents for two of the transactions stated within **Annex: C4) Sales transactions**. Use the box below to give an overview of any supporting documents provided.

Invoices [Confidential – Contains business confidential information] and [Confidential – Contains business confidential information] attached.
--

Appendix reference: C4.2 - Invoice__[redacted]1.pdf C4.2 - Invoice__[redacted]2.pdf





SECTION D: Cause of injury

The purpose of this section is to collect further information as to the cause of the alleged injury. Note that the information submitted at this point can only be taken into account if supported by **factual evidence**.

1. Aside from the imports of the goods concerned from the country under investigation, please provide details of any other reasons that could have resulted in the alleged injury suffered by the UK industry, for example: contraction in demand or changes in the pattern of consumption of the like goods in the UK or developments in technology.

Summary of key factors contributing to alleged injury

- **Energy cost increases (primary driver)**
 - Glass manufacturing is inherently energy-intensive, requiring continuous furnace operation.
 - UK manufacturers have been disproportionately affected by sharp and sustained increases in electricity and gas prices.
 - These cost increases are structural and domestic in nature, and materially reduce margins and competitiveness regardless of import levels.
 - UK industrial electricity prices increased from 14.81 p/kWh in early 2021 to a peak of 28.39 p/kWh in late 2023 (an increase of over 90%), and remained around 75% higher than 2021 levels in 2024 ([The impact of higher energy costs on UK businesses - Office for National Statistics](#))
- **Labour cost increases**
 - UK manufacturers operate within a relatively high-cost labour market, with continued wage inflation and rising employment costs.
 - Increases in minimum wage levels and competition for skilled labour have further elevated cost pressures.
 - These costs are not faced to the same extent by many overseas producers, creating a structural cost disadvantage.
 - The UK labour cost index has continued to increase, reaching **139.75 index points in 2025**, reflecting rising total labour costs over time. ([United Kingdom Labor cost index, June, 2025 - data, chart | TheGlobalEconomy.com](#))
- **Industry structure and operating model**
 - UK glass producers are typically configured for **high-volume, high-speed production**, requiring:



- Long production runs
- High minimum order quantities
- Significant set-up and changeover costs
- This model limits flexibility in responding to:
 - Smaller order volumes
 - Greater product variety
 - Increased design changes
- **Changes in UK demand patterns**
 - Market demand has increasingly shifted towards:
 - More bespoke designs
 - Smaller batch sizes
 - Greater product differentiation
 - These changes can result in **lower capacity utilisation and higher unit costs** for UK producers operating high-volume systems.

Conclusion

In summary, the evidence demonstrates that the UK glass industry has been materially affected by **domestic cost pressures**, particularly energy and labour costs, as well as structural constraints inherent in the UK production model.

These factors are:

- **Independent of imports from China, and**
- **Sufficient in themselves to contribute to reduced competitiveness, lower utilisation, and margin pressure.**

Accordingly, they represent credible alternative explanations for the alleged injury experienced by UK producers.

Appendix reference:





SECTION E: Economic Interest Test

The Economic Interest Test helps the TRA assess the economic impact of a measure compared to what would happen if the measure was not in place. There are six factors which the TRA must consider as part of the Economic Interest Test:

- i) The injury caused by the importation of the dumped goods to UK industry and the benefits to that industry in removing the injury.
- ii) The economic significance of affected industries and consumers in the UK.
- iii) The likely impact on affected industries and consumers in the UK.
- iv) The likely impact on particular geographic areas, or particular groups, in the UK.
- v) The likely consequences for the competitive environment and for the structure of markets for goods in the UK.
- vi) Other matters that the TRA considers relevant.

The questions in this section will contribute to this assessment. Please provide information broken down by each of your company's UK sites/facilities, where relevant and possible.

E1 Background

1. Please complete **Annex: E1) UK Domestic Companies**.

Please see additional notes in the annex for assistance on how to complete it.

2. Please provide an overview of your downstream supply chain. Please indicate who the consumers of glass containers are, which industry and level of trade they relate to, and whether they are companies or private individuals.

From an **Economic Interest Test** perspective:

- **No injury to UK industry:** Since UK producers do not manufacture these specific products, there is **no direct competition and therefore no injury or threat of injury** arising from imports.
- **Supporting downstream UK industries:** Our imports are essential inputs for a wide range of UK-based businesses, particularly **SMEs in the fragrance, cosmetics, and personal care sectors**. These companies rely on access to **high-quality, differentiated packaging** to compete effectively in both domestic and export markets.
- **Impact on competition and consumer choice:** Restricting access to these imports would reduce product variety, limit innovation, and **increase costs across the value chain**, ultimately impacting UK consumers and brand competitiveness.



- **Supply chain resilience and concentration risk:** Given the absence of a viable UK supply base for these products, restricting imports would lead to **increased supply concentration risk**, reduced resilience, and potential disruption to UK manufacturing customers.
- **No realistic substitution:** There are **no viable UK alternatives** that could replace these imports within reasonable timeframes, cost structures, or technical specifications.

In summary, the goods we import are **not “like goods” to those produced in the UK in any commercially meaningful sense**. They serve a distinct market segment that is currently **unmet by UK manufacturers**. Consequently, imports do not cause injury to UK industry; instead, they **enable the competitiveness and growth of downstream UK sectors**, which is strongly aligned with the UK’s broader economic interest.

Appendix reference:

E2 Your company

1. Please complete **Annex: E2) Employment by location**, providing employment figures in full-time equivalents (FTE) for each of your company’s UK sites or facilities.
2. How would these employment figures be affected if an anti-dumping measure was imposed? Please support your claims with evidence.

Difficult to say with any certainty but should anti-dumping duties be applied, as per the information already shared, there would likely be a downturn in total sales volume [Confidential – Contains business confidential information].

Appendix reference:

3. How would your domestic sales of glass containers be affected if an anti-dumping measure was imposed? Please support your claims with evidence.

Difficult to say with any certainty but should anti-dumping duties be applied, as per the information already shared, there would likely be a downturn in total sales volume

Appendix reference:

4. How significant are the imports of glass containers relative to your company’s overall volume of imports?



Total glass containers subject to this investigation constitute [Confidential – Contains business confidential information] a significant volume of our business.

These are, however, only a proportion of what would be impacted as we would also then lose sales of the rest of our supporting accessories that are supplied with the goods under investigation.

Appendix reference:

E3 Potential impacts of a measure

1. Please describe how you would expect an increase in the import prices of glass containers to affect each of the following. where possible, please support your claims with evidence.
 - Domestic prices of glass containers in the UK;

An increase in import prices would be expected to lead to further concentration in the UK market with a risk of excessively **higher overall prices in the UK market**, rather than downward pressure.

- UK manufacturers operate in a **concentrated and capital-intensive market**, and existing supply is limited to a small number of large-scale producers.
- Anti-dumping measures are designed to protect producers, but evidence suggests they can lead to excessively **higher prices for customers and reduced competitive pressure**.

[Anti Dumping: Fair Play in Trade: The Impact of Anti Dumping Measures - FasterCapital](#)

In this case:

- Imported products currently provide **healthy competitive tension**, particularly in niche segments.
- If imports become more expensive or less accessible, **domestic producers would face less competitive constraint**, creating conditions where prices could excessively increase due to a highly concentrated market, rather than stabilise.
- There is no evidence that domestic manufacturers would expand capacity or reduce prices in response, particularly in segments where they do not currently compete.



Accordingly, the likely outcome is excessive **price inflation and reduced competition**, rather than any positive impact for UK customers.

Appendix reference:

- Total UK production of glass containers;

We do not expect a meaningful increase in UK production.

- UK manufacturers are structurally focused on **high-volume, standardised production**, typically requiring:
 - High minimum order quantities,
 - Significant tooling costs,
 - Long production runs.
- By contrast, our business serves **low-volume, highly customised perfume and fragrance bottles**, which:
 - Require flexible production,
 - Involve complex shapes and finishes,
 - Are produced in small batch sizes.

These products are therefore **not “like goods”** to those produced domestically.

In practice:

- UK manufacturers **do not currently offer these products at the required scale, price or lead time**, and there is no indication that they would begin doing so if imports were restricted.
- The limitation is **structural (production model, cost base, and capability)** rather than demand-related.

As a result:

- Any reduction in imports would **not translate into increased domestic production**, but instead into **reduced supply and higher costs**.

Appendix reference:

- Total imports of glass containers from the PRC and other third countries to the UK; and



Imports would be expected to decline, but this would have **adverse effects on the UK market.**

- The UK glass container market already shows a **reliance on imports to meet demand**, with a trade imbalance indicating that domestic capacity does not fully meet market needs.
- A large number of UK SMEs rely on imported products to access:
 - Smaller order quantities,
 - Greater design flexibility,
 - Faster lead times.

If duties were imposed:

- Imports from the PRC would likely fall.
- Some substitution may occur from other third countries, but:
 - These sources are often also international and subject to similar cost pressures.
 - They may not fully replace the range, flexibility, or pricing currently available.

The overall effect would therefore be:

- **Reduced availability of suitable products**, particularly for niche applications,
- **Higher input costs for UK businesses**, especially SMEs,
- Increased risk of **supply shortages and delays**.

This is directly relevant to the Economic Interest Test, which requires consideration of:

- The impact on **consumers and downstream industries**,
- The **competitive environment**, and
- The **structure of the UK market**.

Appendix reference:

- Total exports of glass containers from the UK.

We do not expect any significant change in export levels.

- UK manufacturers are already focused on **specific product segments**, including high-volume beverage containers.
- There is no clear mechanism by which restricting imports would lead to increased exports.
- Export performance is more closely linked to:
 - Cost competitiveness (particularly energy and labour),
 - Existing production capabilities,
 - Established international demand.



These factors would remain unchanged.

Appendix reference:

2. Do you know of any related industries that would be affected if an anti-dumping measure was imposed?

Please consider in particular:

- Upstream industries – those who produce inputs (such as raw materials) needed for the production of glass containers;

Based on the structure of the UK glass market and the nature of the products under consideration, any such impact is likely to be **limited or indirect**.

The key point is that **any impact on upstream industries depends on whether UK glass production increases**. In this case, there is no clear evidence that a material increase in domestic output would occur

Appendix reference:

- Downstream industries – those who purchase glass containers;

Downstream industries would be materially and negatively affected by any reduction in variety and increase in import prices of glass containers. This is particularly the case for the fragrance, cosmetics, beauty and home fragrance sectors, where glass packaging is both a functional and brand-critical component.

These industries include a large number of SMEs and independent brand owners, who rely heavily on access to flexible and cost-effective packaging solutions.

Downstream sectors such as fragrance and cosmetics are characterised by:

- A high degree of **product differentiation and branding requirements**,
- Frequent product launches and design changes,
- A need for **low to medium production volumes**, particularly for growing or niche brands.

Glass packaging in these sectors is not commoditised. Instead, it is:

- **Design-led**, forming part of the product identity,
- Often **bespoke or semi-bespoke**,
- Required in **small batch sizes with short lead times**.



UK glass manufacturers are generally not configured to meet these requirements, as they focus on **high-volume, standardised production runs**. By contrast, imported supply chains provide:

- **Lower minimum order quantities,**
- Greater **design flexibility,**
- Shorter and more responsive lead times.

As a result, SMEs and specialist brands are **structurally dependent on imports** to operate effectively.

Impact on Brand owners and SMEs

If anti-dumping measures lead to higher import prices, the impact on brand owners would be immediate and significant:

Reduced access to suitable products

- If imports become restricted or more expensive, many SMEs may be unable to source:
 - Appropriate bottle designs,
 - Suitable quantities,
 - Packaging aligned with their brand positioning.

Barriers to market entry and growth

- New and emerging brands rely on **flexible sourcing** to test products and scale gradually.
- Higher minimum order quantities and upfront tooling costs from domestic suppliers would:
 - Increase financial risk,
 - Limit innovation,
 - Reduce the number of new entrants.

Increased input costs

- Glass packaging is a core input cost in fragrance and cosmetics products.
- Any increase in packaging cost would directly reduce margins or require price increases.



Competitive disadvantage

- UK-based brands would face higher costs than international competitors who continue to access global supply chains.

Impact on end consumers

Reduced product variety

- A narrowing of available packaging options would reduce:
 - Product differentiation,
 - Brand diversity,
 - Innovation within the sector.

This is particularly important in fragrance and beauty, where packaging plays a key role in:

- Consumer appeal,
- Perceived product quality,
- Brand identity.

Higher retail prices

- Increased packaging costs would ultimately be passed through to consumers.
- Anti-dumping measures are generally recognised as potentially leading to **higher prices where competition is reduced**.

Reduced availability of niche and premium products

- Smaller brands, which often drive innovation and cater to niche consumer demand, are the most exposed to cost increases.
- Some may exit the market or reduce product ranges.

Wider Supply Chain implications

The downstream sectors affected are economically significant and include:

- Cosmetics and personal care,
- Fragrance and home fragrance,
- Premium and artisanal consumer goods.

These sectors:

- Contribute to **UK manufacturing, retail and exports**,
- Are often driven by **SMEs and entrepreneurial businesses**,
- Rely on **flexible supply chains** to remain competitive.

Restricting access to imported glass containers would therefore have broader effects across:



- **Product development cycles,**
- **Retail offering,**
- **UK brand competitiveness globally.**

Appendix reference:

- Industries for complimentary goods – those which would typically be bought alongside glass containers (such as ink being bought with printers); and

Industries producing complementary goods—those typically supplied alongside glass containers—would also be **negatively affected** by an increase in import prices of glass containers.

These complementary goods include:

- Closures (caps, pumps, sprays, droppers),
- Decoration and finishing services (printing, coating, labelling),
- Secondary packaging (boxes, cartons, protective inserts),
- Filling, assembly and contract packaging services.

These sectors form an **integrated supply chain** around glass packaging, particularly in the fragrance, cosmetics, beauty and home fragrance industries.

From an Economic Interest Test perspective, the impact on complementary industries raises several concerns:

Impact on downstream supply chains

- Complimentary goods suppliers are part of a **broader industrial ecosystem** linked to glass containers.
- Negative impacts on downstream sectors (SMEs, brand owners) will **cascade through the supply chain**.

Impact on competition and market structure

- Reduced access to imported containers would reduce:
 - Supplier choice,
 - Flexibility in product development.
- This could lead to **less diverse and less competitive markets**, affecting multiple adjacent industries.

Risk of reduced overall activity

- If higher costs and reduced flexibility lead to fewer products being launched, total activity across:
 - Packaging supply,
 - Decoration,
 - Assembly, will decline.

Overall:



- Complementary goods industries are **closely dependent on the availability, flexibility, and diversity of glass containers**.
- Anti-dumping measures that increase the cost or restrict the supply of imported containers would:
 - **Reduce demand for closures, decoration, and secondary packaging,**
 - **Disrupt integrated supply chains,**
 - **Limit innovation and product development,** and
 - **Negatively affect SMEs and specialist service providers.**

Crucially, these impacts would occur **without any corresponding increase in domestic glass production in the relevant product segments**, meaning that:

- The wider packaging ecosystem would experience **net negative effects**,
- Supply chains would become less efficient and more concentrated, and
- The UK's broader competitiveness in design-led consumer goods sectors could be weakened.

This reinforces the conclusion that imposing measures would have **adverse consequences across multiple interconnected industries**, beyond the glass manufacturing sector itself.

Appendix reference:

- Industries for substitute goods – those which might be bought instead of glass containers (such as margarine instead of butter).

If the cost of imported glass containers increases, downstream users may seek alternative materials where feasible.

- Some applications—particularly in **beauty, personal care, and home fragrance**—can substitute glass with plastic packaging.
- SMEs and emerging brands, which are more sensitive to cost increases, are more likely to:
 - Switch to lower-cost packaging formats,
 - Reduce specification standards, or
 - Reformulate packaging around available alternatives.

As a result:

- Demand for plastic containers and components may increase in the short term.
- This would lead to increased activity in industries supplying:



- Plastic bottles and containers,
- Closures and dispensing systems made from plastic,
- Raw materials such as polymers and resins.

An increase in demand for plastic packaging would place **additional pressure on upstream resin markets**.

- Plastic packaging relies on petrochemical inputs (e.g. polyethylene, polypropylene, PET), which are:
 - Directly linked to global energy markets,
 - Subject to volatility in oil and gas supply.

In the current environment:

- Resin markets are already under pressure due to **global supply disruptions and energy market instability**.
- If more UK businesses switch from glass to plastic:
 - Demand for resin would increase,
 - This could lead to **further price increases and supply constraints**.

Therefore, any substitution effect would not necessarily result in cost stability. Instead, it may:

- Shift cost pressures from one input (glass) to another (plastic),
- Create **new vulnerabilities in supply chains**, particularly for SMEs.

A shift from glass to plastic packaging would also have **environmental consequences**, which carry direct economic implications.

Recyclability and sustainability considerations

- Glass is widely recognised as:
 - Infinitely recyclable without loss of quality,
- Plastic packaging:
 - Is often limited in recyclability,
 - Particularly in complex formats (e.g. multilayer materials, mixed components, or products containing alcohol blends).

In certain applications:

- Plastic bottles containing alcohol blends or fragrances may be:
 - More difficult to recycle,
 - More likely to fall outside standard recycling streams.

Impact on regulatory costs (including EPR)

- The UK regulatory framework (including Extended Producer Responsibility (EPR)) places increasing responsibility on producers for:
 - Waste management,
 - Recycling performance,
 - Environmental impact of packaging.

If businesses shift towards plastic:

- They may face:
 - **Higher EPR fees**,
 - Increased compliance costs,



- Greater exposure to future regulatory tightening on plastics.

These additional costs would ultimately:

- Be borne by **UK businesses and brand owners**, and
- Be passed through to **consumers**.

Distortion of material choice

- Anti-dumping measures could **artificially influence packaging decisions**, not on the basis of product suitability or sustainability, but on:
 - Relative cost increases driven by trade policy.

Reduced efficiency across supply chains

- Businesses may adopt **sub-optimal packaging solutions** due to cost pressures.
- This can lead to:
 - Increased total system costs,
 - Reduced product quality or brand positioning,
 - Inefficient use of materials.

Transfer of pressure rather than resolution

- Rather than strengthening the domestic glass industry, measures may:
 - Shift demand into alternative materials,
 - Transfer cost pressures into other sectors (e.g. petrochemicals),
 - Create **knock-on effects across multiple supply chains**.

Increased demand may:

- Exacerbate **existing supply constraints in resin markets**,
- Lead to **higher prices in plastic packaging**,
- Increase **environmental compliance costs**.

At the same time:

- Downstream sectors would face reduced choice,
- Supply chains would become less efficient, and
- Environmental outcomes would likely worsen.

Appendix reference:

3. To what extent would you expect any changes in prices of glass containers to be passed onto final consumers?

We would expect **a high proportion of any increase in glass container prices to be passed through to final consumers**, particularly in the fragrance, cosmetics, beauty and home fragrance sectors.

This reflects the structure of these markets, the role of packaging in the finished product, and the limited ability of businesses—especially SMEs—to absorb additional costs.

Therefore:



- Any increase in the cost of glass containers would **feed directly into product costs**.
- Businesses would typically have limited scope to absorb these increases without:
 - Reducing margins, (not likely given other cost pressures imposed on UK businesses by the UK government)
 - Increasing retail prices, (impacting inflation and cost of living when it is already strained)

Cost increases are also likely to be **amplified as they pass through the supply chain**.

- Glass containers are often:
 - Decorated, assembled, and packaged with additional components,
 - Incorporated into finished goods that include branding, marketing and retail margins.

An increase at the container level can therefore:

- Affect multiple stages of the value chain, including:
 - Decoration and finishing,
 - Secondary packaging,
 - Distribution and retail pricing.

This means that:

- A relatively modest increase in container cost may result in a **larger increase in final retail price**.

In our opinion:

- The increase in costs is unlikely to be offset by increased domestic competition.
- Price increases are **more likely to pass through fully to end users**.

Appendix reference:

4. Would your plans for investment or expansion in the UK over the next five years be affected if an anti-dumping measure was imposed? Please support your claims with evidence.

Our business is directly dependent on supplying glass containers to UK-based SMEs and brand owners, particularly in the fragrance, cosmetics and home fragrance sectors.

If anti-dumping measures lead to increased prices or reduced availability of imported glass containers:

- Many of our customers would face **higher input costs**, which they may struggle to absorb.
- This would likely result in:



- Reduced order volumes,
- Delayed product launches,
- Cancellation of new developments.

In turn, we would expect:

- A **reduction in sales volumes**,
- Slower revenue growth, and
- Increased uncertainty in demand forecasting.

Given this outlook, it would be commercially prudent to **scale back or delay investment decisions**, particularly those linked to UK growth.

If packaging costs rise:

- Some UK-based businesses may:
 - Reduce their product ranges,
 - Pause expansion plans, or
 - Exit the market entirely.

This creates a direct risk of:

- **Loss of existing UK customers**,
- Reduced customer base over time, and
- Lower overall market activity.

A further likely effect is a shift in sourcing behaviour by UK brands.

If the cost of importing empty glass containers increases significantly:

- Some businesses may choose to **import finished or filled products**, rather than manufacture or fill products within the UK.

This could include:

- Fragrance or cosmetic products that are:
 - Produced, filled, and packaged overseas,
 - Imported as finished goods into the UK market.

The implications are:

- A **reduction in UK-based activity across the supply chain**, including:
 - Filling, assembly, and packaging operations,
- A decline in demand for:
 - Locally supplied packaging components,
 - Associated services.

For our business, this would likely result in:

- Further **reduction in domestic sales volumes**,
- Displacement of UK-based supply by overseas production.

Appendix reference:



5. 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, and
 - sexual orientation.

Please provide any relevant information about whether the imposition of an anti-dumping measure might disproportionately affect any of these groups or any other particular group.

We are not aware of any direct or intentional discrimination arising from the imposition of anti-dumping measures

Appendix reference:

13. How would the number or range of suppliers in the glass containers market be affected if an anti-dumping measure was imposed? Please provide an explanation.

The imposition of anti-dumping measures would be expected to **reduce both the number and range of suppliers available in the UK glass containers market**, particularly in segments requiring flexibility, innovation, and small production volumes.

This effect would arise through reduced import competition, supply constraints, and increased market concentration.

The UK market currently includes:

- A **small number of domestic manufacturers**, focused on high-volume production, and
- A **large number of importers and distributors**, sourcing globally to provide a wide product range.

Appendix reference:



14. How would the suppliers' ability to differentiate their products by price, quality, service or innovation in the glass containers market be affected if an anti-dumping measure was imposed? Please provide an explanation.

Service differentiation in the glass container market generally includes:

- Low minimum order quantities,
- Short lead times,
- Ability to support small or frequent production runs,
- Rapid response to changing customer requirements.

However, UK manufacturers' operating model is not aligned to these requirements:

- Production lines are optimised for:
 - **High-speed, continuous output,**
 - Long, uninterrupted runs,
 - Standardised formats.
- Each production change requires:
 - **Significant setup time,**
 - High tooling and changeover costs.

As a result:

- UK suppliers typically:
 - Require **large MOQs,**
 - Offer **less flexibility on lead times,**
 - Are less able to accommodate short runs or frequent design changes.

If imports are restricted:

- The market loses access to suppliers who specialise in **flexible, low-volume supply,**
- Overall service levels decline, particularly for SMEs.

This leads to **reduced differentiation in service offering,** with fewer options available to customers.

Appendix reference:



15. How would the cost of switching between suppliers in the glass containers market be affected if an anti-dumping measure was imposed? Please provide an explanation.

Currently, customers are able to switch between:

- Multiple **international suppliers**, offering flexibility and varied pricing structures, and
- A smaller number of **UK manufacturers**, focused on high-volume output.

If anti-dumping measures restrict imports:

- The pool of available suppliers would **narrow significantly**,
- Customers would have fewer viable alternatives when seeking to switch.

This directly increases switching costs because:

- Fewer suppliers reduces **competitive tension**,
- Customers may be forced to move to suppliers that are **less compatible with their requirements**.

Switching from imported suppliers to UK manufacturers is not straightforward.

UK glass production is typically characterised by:

- **High-speed, continuous manufacturing processes**,
- **Significant changeover and tooling costs**,
- **Large minimum order quantities (MOQs)**.

When switching suppliers under these conditions, customers may incur:

- **Upfront tooling costs** to create new moulds,
- Commitments to **significantly larger production volumes**,
- The need to redesign products to align with available formats.

For many SMEs and niche brands:

- These costs can be **prohibitive**,
- Making switching either uneconomic or impractical.

Technical and compatibility constraints

Glass containers are not interchangeable components.

Switching suppliers often requires:

- Revalidation of:
 - Bottle dimensions and tolerances,
 - Neck finishes and closure compatibility,
- Adjustment of:
 - Filling and production processes,
 - Secondary packaging (e.g. cartons, inserts).

In sectors such as fragrance and cosmetics:

- Packaging is closely tied to:
 - Brand identity,



○ Product performance (e.g. spray mechanisms, sealing integrity).
Switching suppliers may therefore require:

- **Product redesign,**
- **Testing and certification,**
- Potential delays to product launches.

These technical factors significantly increase the **time and cost required to switch.**

Appendix reference:

16. How would the suppliers' ability to set agreed prices between themselves or for certain consumers or products be affected if an anti-dumping measure was imposed? Please provide an explanation.

Competition is the primary mechanism that ensures suppliers:

- Set prices independently, and
- Compete to offer better value (price, quality, service).

Where competition is reduced:

- Suppliers face **less pressure to keep prices low or responsive** to customer needs,
- Prices are more likely to reflect **supplier cost structures and commercial priorities**, rather than competitive discipline.

Research indicates that where competitors do not act independently, or where competition is weakened, prices can become **inflated and less efficient.**

In this case:

- Anti-dumping measures would reduce the presence of **international competitors**,
- This would leave a smaller number of UK-focused suppliers,
- As a result, suppliers would gain greater **freedom in setting pricing terms.**

Appendix reference:

17. How would the choices of glass containers available to consumers be affected if an anti-dumping measure was imposed? Please provide an explanation.

The imposition of anti-dumping measures would be expected to **reduce both the range and diversity of glass containers available to consumers**, particularly in design-led sectors such as fragrance, cosmetics, beauty and home fragrance.



This effect would arise through:

- Reduced access to imported products,
- Structural limitations in domestic manufacturing, and
- A narrowing of the overall supply base.

The current UK market benefits from a **wide global supply base**, which provides:

- A broad range of bottle shapes, sizes, and finishes,
- Access to both standard and highly customised designs,
- A mix of price points and product specifications.

If anti-dumping measures increase the cost or restrict the availability of imports:

- Many niche or lower-volume products may become **commercially unviable**,
- Importers may rationalise their product ranges to focus on higher-volume lines.

As a result:

- Consumers would face **fewer choices**, particularly in:
 - Bespoke perfume bottles,
 - Specialty cosmetic packaging,
 - Design-led or limited-edition products.

Appendix reference:

18. How would the ability of downstream businesses or consumers to make informed decisions be affected if an anti-dumping measure was imposed? Please provide an explanation.

Many of the most innovative products in sectors such as fragrance and cosmetics rely on:

- Unique packaging design,
- Frequent refreshment of product lines,
- Limited runs of new or experimental formats.

Imported supply chains enable this by offering:

- Flexible production,
- Lower MOQs,
- Willingness to support bespoke design.

If this access is restricted:

- Brands may reduce:
 - The number of new product launches,
 - The variety of packaging formats used,



- Investment in innovative designs.

For consumers, this would mean:

- **Fewer new and differentiated products,**
- A more **standardised and less dynamic market.**

The UK market includes a large number of:

- Small and independent brands,
- Artisan and niche producers,
- Emerging businesses with limited scale.

These brands depend heavily on:

- Flexible sourcing,
- Access to a wide range of packaging options at manageable volumes.

If costs increase and choice narrows:

- Some brands may:
 - Reduce their product ranges,
 - Delay or cancel new launches,
 - Exit the market.

This would lead to:

- A reduction in **brand diversity**,
- Fewer niche or specialised offerings available to consumers.

Impact on consumers

- Reduced variety, higher prices, and fewer innovative products.

Impact on downstream industries

- Reduced ability for brands to differentiate and compete.

Competition and market structure

- Fewer suppliers and less diverse supply result in a more concentrated and less dynamic market.

Appendix reference:

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

Structural mismatch between domestic supply and market demand



A key factor is the **lack of alignment between UK manufacturing capability and actual market requirements**.

- UK producers are largely configured for:
 - High-volume, standardised production,
 - Long production runs and large MOQs.
- Significant parts of UK demand—particularly in fragrance, cosmetics and niche consumer goods—require:
 - Low volumes,
 - Bespoke designs,
 - High flexibility.

This creates a **structural gap in supply**, rather than a pricing issue.

As a result:

- Anti-dumping measures would **not correct a like-for-like competitive imbalance**,
- Instead, they would restrict access to products that are **not meaningfully produced domestically**.

This is highly relevant to the Economic Interest Test, which requires consideration of whether measures address actual injury or create **distortions in market functioning**.

Appendix reference:



SECTION F: Checklist and appendices

This section is an aid to ensure that you have completed all sections of this questionnaire.

Section	Please tick if you have responded to all questions
Section A: Company structure and operations	x
Section B: Imports and forward orders	x
Section C: Sales and selling expenses	x
Section D: Cause of Injury	x
Section E: Economic Interest Test	x

+Add additional rows as required

Please list any appendices that you have referenced in your responses and are attaching with this questionnaire.

Appendix reference	Document title
	A1.2 signed POA
	Appendix_TRA_AD0087_A3
	Appendix_TRA_AD0087_A7.2
	Appendix_TRA_AD0087_A7.5
	1. CB Nominal Ledger Trial Balance Dec 25
	2. CB Profit and Loss Report Dec 25
	B3.2 CON[redacted]1_Freight
	B3.2 CON[redacted]1_Invoice
	B3.2 CON[redacted]2_Freight
	B3.2 CON[redacted]2_Invoice
	B4 - PO_[redacted]1
	B4 - PO_[redacted]2
	C4.2 - Invoice_[redacted]1
	C4.2 - Invoice_[redacted]2
	companies_house_document_audited accounts_YE2024

+Add additional rows as required