Provisional Affirmative Determination and Recommendation of Guarantee

INVESTIGATION No. AD0087

Dumping investigation into certain glass containers imported into the United Kingdom from the People's Republic of China (PRC)

Contents

Section A: Introduction

1. This provisional affirmative determination (PAD) and recommendation to require a guarantee (Recommendation) is made pursuant to paragraphs 11(3) and 13(3)(a) and 13(8A) of Schedule 4 to the Taxation (Cross-border Trade) Act 2018 (the Act).

2. The PAD has been made based on the evidence before the Trade Remedies Authority (TRA) in accordance with paragraph 11(3) of Schedule 4 to the Act.

3. This report includes:
   - a summary of the facts considered during the investigation to date and an explanation of how the TRA has used the information supplied by interested parties and contributors in reaching its PAD and Recommendation.
   - details of the analysis forming the basis of the PAD and Recommendation.

4. It should be read in conjunction with other public documents available for this case, which are available on the public file at https://public-file.trade-remedies.service.gov.uk/case/ad0087.

5. This investigation covers certain glass containers imported into the United Kingdom (UK) from the PRC. A full description of the goods subject to this PAD and Recommendation can be found in Section E: The goods concerned and the like goods.

6. The period of investigation (POI) is 1 January 2025 to 31 December 2025.

7. To assess injury, the TRA has chosen to examine the period from 1 January 2022 to 31 December 2025 as the injury period (IP).

8. The specific years in the IP and POI will be referred to throughout this document as in the following table:

Injury Periods	Year
1 January 2022 - 31 December 2022	Year 1
1 January 2023 - 31 December 2023	Year 2
1 January 2024 - 31 December 2024	Year 3
1 January 2025 - 31 December 2025	Year 4 (POI)

Section B: Preliminary findings

B1. Preliminary determination

9. Based on the evidence before it, and in accordance with paragraph 11(1) of Schedule 4 to the Act, the TRA has determined, that:

a) glass containers have been or are being dumped in the UK;
b) the dumping of glass containers has caused or is causing injury to a UK industry in those goods.

10. As a result, the TRA has made a PAD in accordance with paragraph 11(3) of Schedule 4 to the Act.

B2. Recommended guarantee

11. In line with paragraph 13(3) of Schedule 4 to the Act, the TRA recommends to the Secretary of State for Business, Innovation, Science and Trade ("the Secretary of State") that all importers of the relevant goods should be required to give a guarantee in respect of any additional amount of import duty that would have been applicable, or potentially applicable, to the relevant goods if an anti-dumping amount had been applied to the relevant goods based on the PAD ("an estimated anti-dumping amount").

12. This means that the importer who would be liable for the duty must provide a guarantee that they are able to pay the estimated anti-dumping amount if it becomes payable.

13. The TRA is satisfied that, in accordance with paragraph 13(4) of Schedule 4 to the Act, the guarantee is necessary to prevent injury being caused during the investigation to a UK industry in the relevant goods (defined in Section F: The UK industry and market).

14. The TRA has determined that the guarantee meets the economic interest test and advises the Secretary of State accordingly (see Section I for details).

15. The TRA recommends the estimated anti-dumping amounts stated in Table 1 below:

Table 1: Estimated anti-dumping amounts

Overseas exporter/producer	Duty amount (%)
Huaxing Group, comprising of: a. GUANGDONG HUAXING GLASS CO., LTD.; b. FOSHAN HUAXING GLASS CO., LTD.; and c. FOSHAN CITY SAN SHUI HUA XING GLASS CO., LTD..	26.87%
SPG Group, comprising of: a. Shandong Pharmaceutical Glass Co., Ltd.; b. Baotou KONRE Pharma Glass Packaging Co., Ltd.; and c. Sichuan Chengxin Pharma Glass Co., Ltd..	24.65%
Non-sampled cooperating exporters/producers (see Annex 1)	25.88%
All other overseas exporters (residual amount)	52.97%

16. Section J2 sets out the form of the guarantee; how an estimated anti-dumping amount applicable to the goods should be determined for the purpose of calculating the amount of the guarantee; how the amount of the guarantee should be calculated; and the period during which the requirement to give a guarantee should apply.

Section C: Next steps

17. The purpose of publishing this report is to explain to interested parties and contributors how the decisions to make a PAD and recommend a guarantee were reached and allow these parties to make submissions in response to the preliminary findings; these include:

    a) the goods have been or are being dumped in the UK;
    b) the dumping of the goods has caused or is causing injury to UK industry in the relevant goods;
    c) how the estimated anti-dumping amounts have been calculated; and
    d) the basis for our provisional determination of a particular market situation in the exporting country which does not permit a proper comparison between the export price and normal value.

18. Interested parties and contributors are invited to make submissions in response to this report. Any submissions on this report received prior to the deadline for submission of comments on the statement of essential facts (SEF) will be considered and addressed in the final determination.

19. The TRA may consider submissions made after this date, but please note that it is not obliged to do so if it would cause an unnecessary delay in the preparation of the final determination. Where the TRA rejects information for any reason, it will publish the reasons for rejection in the final determination.

20. Submissions should be sent via the TRA's Trade Remedies Service. Submissions should be accompanied by a non-confidential summary, which will be made available to other parties on the public file at https://public-file.trade-remedies.service.gov.uk/case/ad0087.

21. If the TRA's Recommendation is accepted, the Secretary of State will publish a Taxation Notice, in accordance with paragraph 15(5)(b) of Schedule 4 to the Act. This will give effect to the imposition of the guarantee. Affected importers will be notified that they need to provide the guarantee when importing the relevant goods into the UK.

Section D: Background

D1. Initiation

22. On 3 February 2026, the TRA received an application lodged by the applicant alleging that certain glass containers imported into the UK from the PRC have been or are being dumped and that the dumping has caused or is causing injury to the UK industry in the goods.

23. The TRA is satisfied that the application contained sufficient evidence of dumping and resulting injury to justify the initiation of the investigation, and that the requirements referred to in paragraph 9 of Schedule 4 to the Act and regulation 51 of the Trade

Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 (the Regulations) have been met.

24. The dumping investigation was initiated by the TRA on 5 March 2026, and the notice of initiation was published on that date. The TRA also published registration forms on that day to allow parties to register to the case.

25. The Secretary of State, the foreign government of the exporting country, and other interested parties and contributors were notified accordingly and invited to register on the Trade Remedies Service to participate in the investigation.

D2. Conduct of the investigation

D2.1 Participation in the investigation

26. A full list of all cooperating parties can be found in Annex 1.

27. Due to the large number of registrations, on 10 April 2026, the TRA made a preliminary decision that it would be appropriate to limit its examination to a sample of UK producers, importers, and overseas exporters, and published a notification of proposed sample.

28. Parties were provided with a window for comment until 17 April 2026 in order to satisfy the requirements of regulation 56(4) of the Trade Remedies (Dumping and Subsidy) (EU Exit) Regulations 2019 (the Regulations).

29. The TRA received one submission in response from SGD Asia Pacific which requested to be included within the sample of overseas exporters. The TRA considered this submission and determined not to amend the proposed sample, as per the notification of final sample published on 21 April 2026.

30. Accordingly, the TRA considered it appropriate to limit its examination to the following sample of UK producers, importers, and overseas exporters listed below.

31. In accordance with regulation 54(4) of the Regulations, the TRA limited the issuing of a questionnaire to those UK producers, importers, and overseas exporters included in the sample:

- **UK producers**:
  (based on a reasonable method of three UK producers of varying sizes (one small, one medium, and one big) which produce a wide variety of glass containers. This will enable an accurate representation of the wider UK industry and will assist with PCN matching if required later in the investigation.)
  1. BEATSON CLARK LIMITED (“Beatson Clark”);
  2. VERALLIA UK LIMITED (“Verallia”); and
  3. ARDAGH GLASS LIMITED (“Ardagh”).
- **Importers**:
  (based on the largest volume of exports from the PRC to the UK that the TRA is reasonably able to investigate.)

1. PATTESONS GLASS LIMITED (“Pattesons”); and
2. Continental Bottle Co. Limited (“Continental Bottle”).

- **Exporters**:
  (based on the largest volume of exports from the PRC to the UK that the TRA is reasonably able to investigate.)
  1. Huaxing Group, comprising of:
     a. GUANGDONG HUAXING GLASS CO., LTD. (“Guangdong Huaxing”);
     b. FOSHAN HUAXING GLASS CO., LTD. (“Foshan HX”); and
     c. FOSHAN CITY SAN SHUI HUA XING GLASS CO., LTD. (“Sanshui Huaxing”).
  2. SPG Group, comprising of:
     a. Shandong Pharmaceutical Glass Co., Ltd. (“Shandong Pharmaceutical”);
     b. Baotou KONRE Pharma Glass Packaging Co., Ltd. (“Baotou KONRE”); and
     c. Sichuan Chengxin Pharma Glass Co., Ltd. (“Sichuan Chengxin”).

32. The TRA notes that it had cooperation from all sampled interested parties. We have based our assessments on the data provided by them, but have used limited third-party data, including public His Majesty's Revenue and Customs (HMRC) data, and Statista data, to contextualise our assessments. This is in accordance with Regulation 47(5).

33. The TRA is satisfied that the interested parties have been given an adequate opportunity to provide information to it regarding the investigation.

D2.2 Registration of imports

34. In its application, the Applicant requested the Secretary of State to direct HMRC to register the goods subject to investigation.

35. On 23 March 2026, the Secretary of State published a notice informing parties of the registration of imports, and HMRC began registering the goods from 24 March 2026 in accordance with paragraph 29 Schedule 4 of Taxation (Cross-border Trade) Act.

D3. Verification of data

36. This PAD and Recommendation is based on information available to the TRA at the time of drafting, and the TRA deems this information sufficient to reach a provisional determination and to make a recommendation.

37. Verification activities considered appropriate to assess the completeness, relevance, and accuracy of the information provided by sampled parties is ongoing at the time of drafting this PAD and Recommendation. As a result of that activity, data may be excluded or adjusted which could impact the conclusions and calculations included in the SEF and final determination.

D4. Post-application comments

38. Whilst verifying questionnaire responses, the TRA also received the following three submissions from representatives of interested parties:

a) a **submission** from Hogan Lovells on behalf of Berlin Packaging UK Ltd., Continental Bottle, and Croxsons on 31 May 2026;
b) a **submission** from Nishimura & Asahi on behalf of Huaxing Group on 01 July 2026; and
c) A **submission** from East & Concord Partners on behalf of SGD Asia Pacific on 07 August 2026.

39. The first two submissions provided comments on the economic interest test (EIT), injury and causation; and procedural concerns (such as the TRA's assessment of the application and the data on which it was based, the anonymity of the applicant, and the extent of which information was redacted in the application.

40. Regarding the comments in relation to the EIT and injury and causation, the comments in both submissions (including, for example, information relating to minimum order quantities (MOQs) and the perceived impact on small and medium-sized enterprises (SMEs)) have been treated as supplementary evidence and have been considered as part of this PAD. In accordance with Reg 47 of the Regulations, the TRA will continue to have regard to information supplied to it by an applicant UK industry, an interested party, a contributor or any other person from whom it has requested information, provided that the information:

a) is verifiable;
b) has been appropriately submitted such that the TRA may use the information without undue difficulty;
c) has been supplied to it within any applicable time limit; and
d) where relevant, has been supplied to it in a form that it has requested.

41. Regarding the procedural concerns outlined in the submissions, the TRA notes that the applicant provided reasonable justification for requesting anonymity. And, as the UK industry is comprised of only six UK producers, we assessed that, for the application, it was prudent to sufficiently redact confidential information to avoid inadvertently revealing the identity of the applicant. The TRA further notes that the standard for both disclosure and assessment is necessarily lower for application than is necessary to support a preliminary or final determination. As such, whilst we acknowledge the comments about data sufficiency, specific injury factor assessments, and POI/causation timings, we remain satisfied there was sufficient evidence in the application to warrant the initiation of this dumping investigation.

42. The third submission claimed that "the UK industry does not manufacture Cosmetic Glass Containers" and that "the glass containers manufactured by the UK industry are not like goods with Cosmetic Glass Containers". However, based on the questionnaire responses from the sampled UK producers, we determined that cosmetic glass containers are manufactured in the UK, and we have assessed that they are like the cosmetic glass containers imported from the PRC. This is detailed in section E2.

Section E: The goods concerned and the like goods

E1. Goods concerned

43. The TRA refers to the goods it investigates as the 'goods concerned' defined by regulation 2 of the Regulations, i.e. the goods described in the relevant notice of initiation (NOI) of a dumping investigation under regulation 65(1) of the Regulations.

44. The goods concerned are certain glass containers originating 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.*

45. The goods concerned are imported into the UK under the following UK Global Tariff commodity codes:

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

E2. Like goods and comparison with the goods concerned

46. The goods description above was provided by the Applicant, was included within the NOI, and remains the same in the PAD. The TRA assessed that the goods description accurately and completely describes the imported products identified by the Applicant which are the alleged cause of injury. The TRA also examined similar goods that were outside the goods description including:

- glassware of a kind used for table, kitchen, toilet, office, indoor decoration or similar purposes (other than that of heading 7010 or 7018);
- ampoules;
- stoppers, lids and other closures, of glass;
- containers made of tubular glass, and;
- glass containers with a nominal capacity of 2.5 litres or more.

47. The TRA assessed that each of these were well defined goods and clearly distinguishable from the goods concerned.

48. The TRA determined that this goods description also accurately and completely described the goods produced by the UK industry.

49. In accordance with paragraph 7 of Schedule 4 to the Act, the TRA refers to 'like goods' as those which are like the goods concerned in all respects or, if there are no such goods, goods which, although not alike in all respects, have characteristics closely resembling those of the goods in question.

E2.1 Like good submissions

50. In their registration forms (via a combined submission from their parent company, Tricorbraun Limited), both Continental Bottle and Neville and More indicated that a considerable volume of the goods it imported were cosmetic and perfumery containers which they alleged were not produced by UK producers. Similar arguments were later submitted on behalf of a variety of PRC exporters and UK importers, as outlined in section , in addition to other arguments regarding how MOQs affect the ability of UK customers to purchase UK produced like goods in small volumes.

51. Our assessment of the like goods considered all UK produced like goods, but with specific attention to the goods referenced in the comments above.

52. In assessing whether the goods produced by the UK industry are like the goods concerned in all respects or with characteristics closely resembling them, the TRA has assessed:

    a) physical likeness, including physical characteristics;
    b) commercial likeness, including competition and distribution channels;
    c) functional likeness, including end-use or interchangeability of the goods;
    d) similarities in production, including method of production and inputs;
    e) other relevant characteristics.

53. The TRA assessed the physical likeness of the UK like goods to the goods concerned by characteristics including appearance, chemical composition, quality, size and dimensions, strength and weight. We identified that perfume and cosmetic glassware were produced by the UK industry. Whilst we note that the goods as described are extremely heterogeneous, we were not able to identify any factors that suggested that the goods produced in the UK were fundamentally unlike the goods concerned.

54. The TRA assessed the commercial likeness of the UK like goods to the goods concerned by characteristics including end use, distribution channels, identity of downstream users and whether the goods concerned competed directly with the UK market.

55. The TRA identified that cosmetic and perfumery goods were produced by the UK industry, but acknowledge that that they would likely have price behaviour dissimilar to the equivalent goods concerned. The TRA also noted that some interested parties had indicated that MOQs could affect the ability of customers to purchase small volumes of UK produced like goods.

56. The TRA does not yet have sufficient evidence from the full range of interested parties in order to adequately assess the effect of MOQs, but will attempt to do so in

subsequent analyses depending on the information submitted to the TRA by interested parties and contributors.

57. Acknowledging the information above, as all other commercial characteristics of those goods closely resembled those of the equivalent goods concerned, we assessed that market segmentation was neither appropriate nor practicable and that these goods had characteristics closely resembling the goods concerned.

58. The TRA assessed the functional likeness of the UK like goods to the goods concerned by characteristics including end use and interchangeability. In particular, we assessed cosmetic and perfume containers which can have complex designs and exacting specifications for relatively small runs of goods. Whilst the goods as described are extremely heterogenous, we were not able to identify any examples of goods concerned that were functionally unlike examples of equivalent goods produced by the UK industry.

59. The TRA assessed similarities in production, including methods of production and inputs. Glass containers as described are extremely heterogenous and we identified a wide range of finishing processes and tests which may be specific to individual products. This said, the core process of manufacture for both the goods concerned and the UK like goods is very similar. The TRA received no information that indicated that the core processes of manufacture were fundamentally different in the PRC or UK industries. We also examined the input of raw material, in particular the use of post-consumer cullet and found that whilst there was frequently variation in the composition of glass between individual goods, there were no fundamental differences that would differentiate the UK produced goods as being fundamentally unlike the goods concerned.

60. Based on the information provided by interested parties and research undertaken, the TRA has determined that the goods produced by the UK, whilst not alike in all respects, have characteristics closely resembling those of the goods concerned and are therefore constitute like goods for the purposes of paragraph 7 of Schedule 4 of the Act.

E3. Product control numbers

61. The TRA uses product control numbers (PCNs) to define and group different types of products that fall under the goods description above (section E1).

62. PCNs are created on the basis of the main physical characteristics differentiating the types of products, providing that those characteristics have an impact on price.

63. The PCN structure used in this case can be seen in the table below:

Table 2: PCN structure

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

64. The PCN structure was provided to interested parties and contributors for comment in the registration forms following initiation. This version of the PCN table takes into account comments received during that process.

E4. PCN analysis

65. The TRA's calculations of dumping and injury margins are based on matching PCNs which ensures that they compare the costs and prices of comparable goods.

66. For dumping margin calculations, the TRA compares the PCNs produced and sold by overseas exporters in their domestic market with the PCNs produced and exported by these overseas exporters into the UK.

67. For injury margin and undercutting calculations, the TRA matched the PCNs produced and exported by overseas exporters into the UK with the PCNs produced by UK industry and sold on the UK market.

68. The TRA found that the PCNs were sufficient for the purposes of the dumping margin but were too granular to allow comparison for the injury assessment without considerable collapsing.

69. For preliminary calculations, injury margin and undercutting calculations for Huaxing Group were based on full PCNs but required the exclusion of one of three of the UK sampled producers. For SPG Group matches were only made by excluding five PCN categories and compressing the answers from two of the remaining categories from 15 to 2 options. This allowed an underselling margin to be calculated but not an undercutting margin.

Section F: The UK industry and market

F1. UK industry

70. In accordance with paragraph 6(1) of Schedule 4 of the Act, the UK industry is defined as:

    f) all the producers in the UK of like goods, or
    g) those of them whose collective output of like goods constitutes a major proportion of the total production of those goods in the UK.

71. Open-source research, combined with information provided in the application, registration forms, and questionnaire responses were used to establish the UK industry.

72. The TRA established that there were six producers in the UK of like goods during the IP (two large, two medium, and two small). Using data from registration forms, HMRC Overseas Trade in Goods Statistics (OTS) Bulk Datasets, and National Packaging Waste Database (NPWD), we were able to reliably assess that the production of these six producers was between 1,500,000 and 2,000,000 tonnes during the POI.

73. Five out of the six UK producers (the participating UK industry) registered to the investigation (all except for O-I GLASS LIMITED ("O-I")), and using the data above, we assess that they represent between 85-95% of the UK industry.

74. Therefore, for the purposes of this investigation, the UK industry is defined as all the producers in the UK of like goods, in accordance with paragraph 6(1)(a) of Schedule 4 of the Act.

F2. UK market

75. The goods are primarily used as containers for other products, primarily foodstuffs, pharmaceuticals, and cosmetics. Whilst home preservation glassware is sold directly to end users in small volumes, the majority of glass containers are sold either directly to manufacturers of other products or to wholesaler / importers.

76. As shown in Table 24, the NPWD indicates that between 2,106,966-2,563,673 tonnes of container glassware were put onto the UK market annually during the IP. Of this, we estimate between 85-90% of goods were manufactured domestically, between 11-14% were imported from all countries, and 0.8-1.6% were imported specifically from the country concerned.

Section G: Provisional findings on dumping

78. In accordance with paragraph 1(1) of Schedule 4 to the Act, goods are 'dumped' in the UK when those goods are imported into the UK, and their export price is less than their normal value.

79. The TRA has assessed whether the goods concerned are being dumped in accordance with paragraphs 1(1) and 8(1)(a) of Schedule 4 to the Act.

80. Paragraph 1(2) of Schedule 4 of the Act defines the 'normal value' of goods as:

    a) the comparable price, in the ordinary course of trade, for like goods when destined for consumption in the exporting foreign country or territory, or
    b) such other price or value as may be determined in accordance with provision made by regulations for specified cases where it is not appropriate to use the price in paragraph (a)

81. The dumping margin is the difference between the export price and the normal value of the goods being dumped, described as a percentage of the export price at a level of the cost of insurance and freight (CIF), in accordance with paragraph 2 of Schedule 4 to the Act.

82. The TRA has calculated dumping margins in accordance with paragraph 2 of Schedule 4 to the Act and regulation 6(2) of the Regulations. In the preliminary determination, calculating the dumping margin involved the following stages:

    h) calculating the normal value of the goods concerned;
    i) determining the export price;
    j) ensuring a fair comparison between the normal value and the export price;
    k) calculating the dumping margins.

G1. Exporting country analysis

83. Based on information submitted by interested parties, the TRA established that, within the PRC, there were at least 12 overseas producers of the goods concerned during the POI, and at least 10 exporters of the goods concerned during the POI.

84. During the POI, based on HMRC OTS Bulk Datasets, imports of the goods concerned accounted for an estimated volume of 34,000 metric tonnes and import value of £58,036,933. This represents approximately 11% of total global imports of glass containers to the UK by volume.

85. The HMRC OTS Bulk Datasets are at an 8-digit commodity code level, based on the country of origin. The commodity codes at 8-digit are identical to the commodity codes at 10-digit, as all these commodity codes at 10-digit end in "00", so these figures only include the goods in scope of this investigation.

G2. Normal value

86. In accordance with regulation 6(1) of the Regulations, Part 2 of the Regulations applies where the TRA is required to determine whether goods have been or are being dumped into the UK in accordance with paragraph 1 of Schedule 4 to the Act. To make such a determination the TRA must determine the normal value of the goods concerned in accordance with regulation 6(2)(a) of the Regulations.

87. In accordance with regulation 7(1) of the Regulations, the TRA must use the comparable price to determine the normal value unless it is not appropriate to use that price.

88. Regulation 7(2) of the Regulations sets out the circumstances in which it is not appropriate to use the comparable price to determine the normal value of the goods concerned. This includes where, because of a particular market situation or the low volume of sales in the domestic market of the exporting country or territory, such sales do not permit a proper comparison between the like goods destined for consumption in the exporting country or territory and the goods concerned, in accordance with regulation 7(2)(b) of the Regulations.

89. Regulation 7(4) of the Regulations sets out that for the purposes of paragraph 7(2)(b) a particular market situation (PMS) includes situations where prices are artificially low, there is significant barter trade, or prices reflect non-commercial factors.

90. In its application, the applicant alleged that a PMS exists in the PRC market in respect to the glass containers industry. It alleged that PRC production benefits from non-commercial factors influencing prices which are not the result of free market forces.

91. The PMS allegations have been summarised by the TRA into the following factors, which have been used to assess the existence of PMS:

- State control over the economy;
- Land use rights;
- Energy
    - Electricity;
    - Natural gas;
- Raw materials
    - Limestone;
    - Silica sand;
    - Soda ash;
- Labour costs; and
- Bank loans.

92. The TRA investigated the applicant's allegations to determine whether the overseas exporters' prices are artificially low or reflect non-commercial factors and cause a PMS in the domestic glass containers market in the PRC, to the extent that they do not permit a proper comparison. The TRA's detailed assessment of each specific allegation can be seen in section G2.1.2 Assessing the existence of a PMS.

93. Where it is not appropriate to use the comparable price the TRA must determine the normal value of the goods in accordance with regulation 8 of the Regulations.

94. The TRA calculated the normal value of the goods concerned by determining the costs of production plus a reasonable amount for administrative, selling and general (AS&G) costs and for profits in accordance with regulation 8(1)(a) of the Regulations. This calculation is covered in further detail in Section G2.2 Constructed normal value.

G2.1 Particular market situation

G2.1.1 Preliminary PMS assessment

95. The TRA conducted an initial PMS assessment as part of the decision to investigate the PMS allegations made by the applicant. This assessment considered the allegations of PMS and found that they were consistent with previous findings made by the TRA and other investigating authorities.

96. The initial PMS assessment considered previous TRA findings on PMS that are relevant to this investigation, notably AD0012, AD0021, AD0047, AD0058 and AD0062. The TRA determined in these investigations that PRC government support and influence resulted in prices that reflected non-commercial factors.

97. The anti-dumping investigation into aluminium extrusions originating in the PRC (case number AD0012) found that energy prices reflected non-commercial factors.

98. AD0021 identified evidence of government support, influence and control in the optical fibre cable (OFC) industry in the PRC. The investigation found that prices relating to land, loans, energy, and labour in the PRC reflected non-commercial factors.

99. In the anti-dumping investigation into certain excavators from the PRC (AD0047), the TRA found that prices in relation to energy, labour, land, and finance reflected non-commercial factors.

100. The TRA found on AD0058, relating to biodiesel from the PRC, that a PMS was reflected in the prices of energy, finance, and labour.

101. In AD0062, an anti-dumping investigation concerning Tin Mill form the PRC, the TRA concluded that a PMS was reflected in the prices relating to energy and labour markets in the PRC.

102. TRA's initial PMS assessment concluded that there was sufficient evidence in the application, from the findings of other investigating authorities and previous TRA findings that a PMS exists in the PRC concerning the glass containers market to undertake further investigation and analysis in respect to the alleged PMS. PMS questions were therefore added to the questionnaire templates.

G2.1.2 Assessing the existence of a PMS

103. Having concluded that there was sufficient evidence to undertake further investigation and analysis in respect to the alleged PMS, the TRA assessed the existence of a PMS. Each of the types of allegations made by the applicant has been considered

individually before a conclusion is reached based on a holistic assessment of all considered factors.

G2.1.2.1 State control over the economy

104. The Applicant alleges that the PRC's economic and administrative structure provides the Chinese Government, through the CCP, with substantial powers to intervene in the economy in such a way that prices and costs are not the result of the free development of market forces.

105. The constitution of the PRC was last updated in 2018 and states that the state-owned economy is considered the "*leading force of the national economy*", and the state has the mandate "to ensure its consolidation and growth."[1]

106. The Applicant also stated that state presence in firms does not only concern state-owned enterprises but also private companies. Whilst both the sampled exporter groups stated that they are privately-owned companies, and that they do not consider that their activities relating to glass containers were affected by non-commercial factors arising from the alleged government intervention or control through State-owned Enterprises (SOEs), the ultimate controlling company of SPG Group is Shandong Luzhong Investment Co., Ltd. ("SDLZ"), which is an SOE.

107. An article posted on 21 April 2026 by China Chengxin (Asia Pacific) Credit Ratings Company Limited ("CCXAP") states that SDLZ was founded in 2016, and states that:

- "SDLZ is one of the major local state-owned enterprises that is responsible for local investment and infrastructure construction in Yiyuan Country."
- [SDLZ] "will maintain an important position in the public policy projects in Yiyuan County and will not be easily replaced by other local state-owned enterprises in the foreseeable future"; and
- "We expect that, as the key local state-owned enterprise in Yiyuan County, the Company plays an irreplaceable role in the region's development and operations, and will continue to receive government support over the next 12 to 18 months."

108. The TRA assesses that the Government of China (GoC) is still able to influence private companies, for example via the parent companies of private companies.

109. The Mercator Institute for China Studies conducted an analysis on Made In China 25 (MIC25). They report that "In recent years, the government has increased pressure on China's private sector to contribute to the MIC25 mission.The report states " , "As soon as a company becomes a leader in a sector of national strategic importance, it is expected to contribute to reaching national goals and to team up with the government by, among other things, aligning investments and R&D closely with government policies.". It is therefore possible that the GoC has put pressure on the PRC's glass containers industry, either directly to producers (or their parent companies), or

[1] Constitution of the People's Republic of China

indirectly via suppliers of major inputs and raw materials which could potentially lead to distortions.

110. The Applicant also alleges that the state control over the economy also influences upstream industries such as energy and raw materials which has an impact on the production cost of glass containers. For example, SOEs dominate the energy market, in resource extraction, infrastructure and transmission, and distribution. SOEs account for almost 90% of the total income in oil and gas extraction.[2]

G2.1.2.2 Land use rights

111. The Applicant claims that property rights are regularly not respected in relation to ownership of land and land-use rights in the PRC, which has resulted in in distorted land costs for producers of the goods concerned in the PRC.

112. The TRA has determined in previous investigations that land prices in the PRC reflect non-commercial factors, such as in AD0021, where it was determined that the lease of land by local authorities was not an open process and led to land prices and rent rates that were artificially low and/or reflected non-commercial factors. In AD0047, it was also found that land was not bought and sold at prices determined by free market supply and demand.

113. The Applicant also stated that other authorities have made similar findings; for example, the EU Commission in its "commission staff working document on significant distortions in the economy of the people's republic of china for the purposes of trade defence investigations (April, 2024) ("the EC's SWD on distortions") (chapter 9.5, page 253) stated that, "[to] date, the authorities set the land-use right prices according to the Urban Land Evaluation System[3], which instructs them, among other criteria, to consider also industrial policy when setting the price of industrial land".

114. The applicant also stated that "there is no evidence readily available showing that the glass container manufacturing sector is exempt from the land use laws in China. In fact, given that glass is a key input into the manufacture of the strategically important green energy sector for solar panels, it is highly likely that they are a beneficiary of the urban land evaluation system outlined above."

115. Several laws within the PRC state how land use rights are owned and allocated in the PRC.

116. Article 10 of the Constitution of the PRC states that "The land in cities belongs to the State", and that "except for land that is owned by the state as stipulated by law, land in rural areas and urban suburbs is collectively owned"[4]. Article 10 also states that "for the needs of public interest, the state may expropriate or requisition land and provide

[2] View of The Role of State Ownership Policy in China's Energy Sector: Challenges and Opportunities for Foreign Multinational Corporations in Controlled Economy, page 57
[3] See Article 3 of the Circular of the State Council on Strengthening the Asset Management of State-Owned Lands, Guo Fa [2001] No. 15,(original text in Chinese), available at: http://www.gov.cn/gongbao/content/2001/content_60846.htm (accessed on 05 August 2026
[4] Constitution of the People's Republic of China - Chapter I General Principles - Article 10 (2018), accessed 05 August 2026

compensation in accordance with the law", and that "the right to use land may be transferred in accordance with the provisions of the law".

117. The Ministry of natural resources states in Article 5 of the Provisions on the Transfer of State-owned Construction Land Use Rights through Bidding, Auction and Listing that land allocation will be done "based on economic and social development plans, industrial policies, overall land use plans, annual land use plans, urban planning, and land market conditions. After approval by the people's government at the same level, the plans shall be promptly released to the public"[5].

118. The Land Administration Law of the PRC states in article 2 that the State Council of the PRC owns all state land, that no individuals may own land and the right to use land is transferred according to law, that it may expropriate or requisition land in accordance with the law, and that it implements paid use of state-owned land except where the state allocates land use rights[6]. Article 4 then states that those given land use rights "must use the land strictly in accordance with the purpose determined by the overall land use plan", article 15 states that "People's governments at all levels shall organize the preparation of overall land use plans based on the national economic and social development plans, […]", and article 23 states that "the annual land use plan shall be prepared based on the national economic and social development plan, national industrial policy, overall land use plan and the actual situation of construction land and land use". These articles demonstrate that land use right allocation must be done in accordance with state industrial and social planning, and that all levels of government are required to coordinate the allocation of land-use rights.

119. The Civil Code of the PRC includes property rights regulations in the PRC, superseding the previous the Property Law of the PRC when it entered into force in 2021[7]. It states in article 347 that "Commercial land such as industrial, commercial, tourism, entertainment and commercial residential land, as well as land with more than two potential users, shall be sold through public bidding such as tendering and auction". However, this is expanded on in the Urban Real Estate Management Law of the PRC which states in article 13 that "for commercial, tourism, entertainment and luxury residential land, [..] if conditions do not permit and auction or bidding is not an option, bilateral agreement may be used. The transfer fee for land use rights transferred by way of bilateral agreement shall not be lower than the minimum price determined in accordance with national regulations"[8]. This law therefore allows land to be transferred via closed bilaterial agreements and introduces price fixing based on national regulations rather than the commercial value of the land.

120. The civil code also states in article 354 that where construction land is "transferred, exchanged, contributed, donated or mortgaged, the parties shall enter into a

[5] Provisions on the Transfer of State-owned Construction Land Use Rights through Bidding, Auction and Listing, accessed 05 August 2026
[6]][l7][l7rd Law of the People's Republic of China - General Provisions (2019), third amendment (2019), accessed 05 August 2026
[7] Civil Code of the People's Republic of China – part II Property Rights, accessed 05 August 2026
[8] Urban Real Estate Management Law of the People's Republic of China - Chapter II Land for Real Estate Development, accessed 05 August 2026

corresponding contract in written form". This shows that there are additional ways to subvert the process of acquiring land use rights via tendering and auctions in the PRC.

121. These laws demonstrate that the GoC strictly controls what land can be used for based on factors such as development plans and industrial policy, and that it has significant influence over access to land before and after it has been allocated to organisations. This control and influence over the market for land use rights results in the price of land being significantly determined by the industrial planning and political decision-making of the GoC rather than commercial factors such as the demand and supply of land within the PRC.

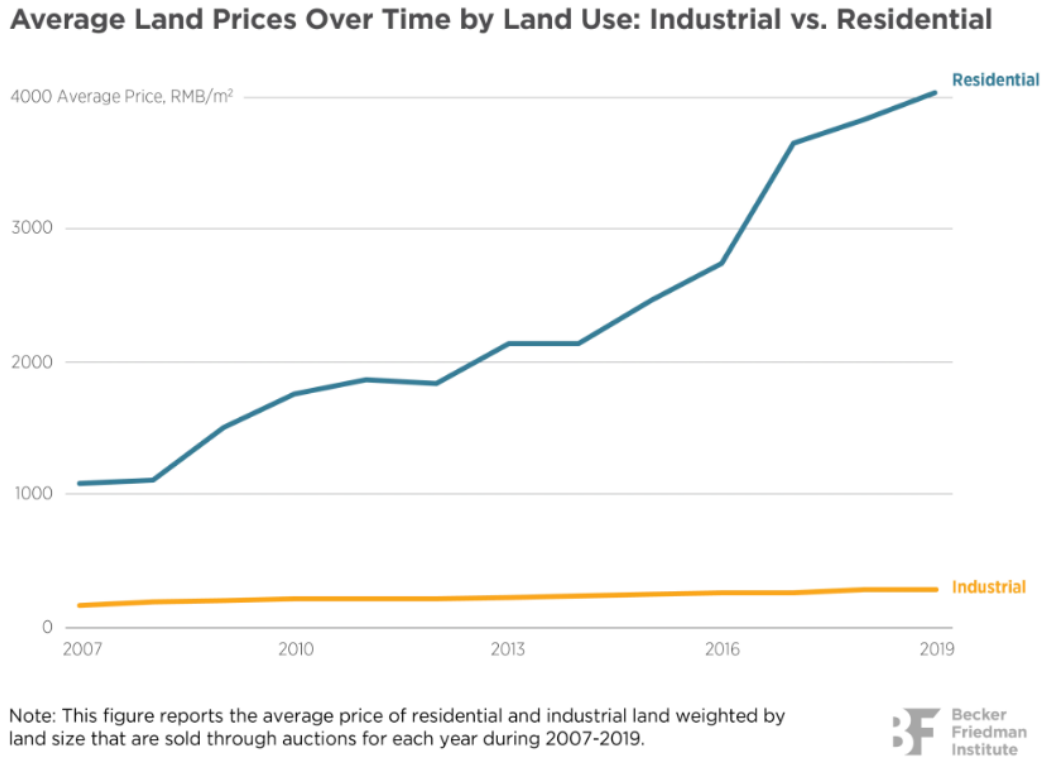
122. Land is preferentially priced based on certain state industrial policies. For instance, encouraged foreign-funded projects with intensive land use can be priced at 70% of the national minimum price for the transfer of industrial land[9]. The Ministry of Natural Resources also limits the price of long-term leases based on what it determines the land value to be and strictly limits rent price increases to less than 10%[10]. This shows how state industrial planning influences the price of land in the PRC depending on state priorities.

123. A strong indication that the price of land use rights for industrial use reflect non-commercial factors is that industrial land in the PRC is routinely priced at a significantly lower price than residential land. Research by the University of Chicago in 2022 found that the average land price of residential land in the PRC rose significantly whereas the price of industrial land rose only marginally between 2007-2019, resulting in the average price of residential land being over 10 times higher than industrial land in 2019[11]. The research proposes that residential land rates are primarily in place to raise local government revenue and reflect market realities to maximise revenue, whereas industrial land prices reflect subsidised industrial policies and is not representative of commercial reality.

124. Although the TRA has assessed that the land market in the PRC reflects non-commercial factors, it has not made any adjustments in this area within this PAD. Further work will be conducted by the TRA within this investigation, to establish to what extent it may affect the production costs of glass containers in the PRC.

[9] China Released Draft Encouraged Catalogue to Boost Foreign Investment, China Briefing (2024), accessed 05 August 2026
[10] Notice of the Ministry of Natural Resources on Improving Industrial Land Supply Policies to Support the Development of the Real Economy (2022), accessed 05 August 2026
[11] Is There an Industrial Land Discount in China? A Public Finance Perspective, Becker Friedman Institute for Economics, The University of Chicago, accessed 05 August 2026

Figure 1: Average land prices over time in the PRC: industrial vs residential



Source: Is There an Industrial Land Discount in China? A Public Finance Perspective (Beckler Friedman Institute for Economics)

G2.1.2.3 Energy (electricity and natural gas)

125. The Applicant alleges that GoC intervention affects the price of energy in the glass containers market.

126. The Applicant stated that electricity accounts for around 20% of the energy used to manufacture glass containers, whereas natural gas is a critical energy input for the production of container glass and accounts for over 80% of site energy consumption.

127. It also stated that coal remains the main energy source in China (as stated in the EC's SWD on distortions (section 10.3)). The applicant submits that it is likely that the electricity used by glass manufacturers is generated by coal-fired power stations.

128. Feve's 2025 report states that the average recycled content of glass containers made in Europe is 53.55%, and this Glass Forum article states that "while it may vary from manufacturer to manufacturer, glass from China generally has a lower percentage of recycled content than glass from the Europe." This brochure by Feve says that "on average, a 10% increase of cullet in the furnace decreases its energy use by 3%". Therefore, the TRA assessed that glass containers in China are likely to use a large amount of energy in their production processes.

129. The TRA has determined in previous investigations that energy costs in the PRC reflect non-commercial factors. TRA investigations, AD0012, AD0021, AD0047, AD0058, and AD0062 all found that government intervention distorted energy costs and that prices reflected non-commercial factors.

130. The electricity in the PRC is distributed and sold by two organisations dependant on region; either the State Grid Corporation of China (SGCC)[12] or the China Southern Power Grid (CSPG)[13]. The CSPG operates in Guangdong, Guangxi, Yunnan, Guizhou, Hainan, Hong Kong, and Macao, and the SGCC operates in all other provinces and municipalities in the PRC. The manufacturing facilities for Huaxing Group and SPG Group are based in Guangdong and Shandong respectively, so the relevant authorities are both CSPG and SGCC.

131. Both companies are under the sole ownership of the State-owned Assets Supervision and Administration Commission of the State Council (SASAC)[14] and have corporate objectives that the organisations should implement state industrial policy and conform to the party line and principals of the CCP[15]. This demonstrates that the distribution and sale of electricity to companies in the PRC is significantly influenced by government policy and political objectives as opposed to purely commercial factors.

132. The WTO has found that price controls in the PRC take two forms; “government-set prices” or “government-guided prices”[16]. Government-set prices are fixed prices set by the competent authorities, while government-guided prices are prices set by business operators within a range of prices set by the competent pricing departments or other related government departments, within which the real price is allowed to fluctuate. In this section, both forms of price control will be considered indicative of non-commercial factors influencing the price of energy in the PRC.

133. The WTO considers electricity transmission and distribution to be a product subject to pricing controls set by the government[17]. Price controls are administered in the PRC by the Department of Pricing, which is part of the National Development and Reform Commission (NDRC) and its function is to “monitor, forecast and give warning of price changes, and propose price control targets and policy recommendations”[18]. The products and services that are subject to price controls are listed in a Central Government Pricing Catalogue[19]. The current Central Government Pricing Catalogue was issued by the NDRC on 13 March 2020 (NDRC Order No. 31, 2020) and came into effect on 1 May 2020. The list includes “provincial and above provincial power grid transmission and distribution prices”. This demonstrates that energy prices in the PRC are determined by price controls and rather than by commercial factors.

134. The relevant legislation that regulates price controls is the Pricing Law of the PRC[20]. Articles of the pricing law that demonstrate the non-commercial determination of energy prices include:

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[12] Company Introduction - State Grid Corporation of China, accessed 05 August 2026
[13] Company Basic Information – China Southern Power Grid, accessed 05 August 2026
[14] List of Central enterprises – SASAC, accessed 05 August 2026
[15] Party Building – State Grid Corporation of China and Discipline inspection and Supervision – China Southern Power Grid, accessed 05 August 2026
[16] WTO Trade Policy Review China: Report by the Secretariat - Sept 2021, accessed 05 August 2026
[17] WTO Trade Policy Review China: Report by the Secretariat - Nov 2024, accessed 05 August 2026
[18] National Development and Reform Commission (NDRC): About, accessed 05 August 2026
[19] NDRC: Order of the National Development and Reform Commission of the People's Republic of China, accessed 05 August 2026
[20] Pricing Law of the People's Republic of China, accessed 05 August 2026

- Article I *"This Law is enacted in order to standardize pricing, give play to the role of pricing in rationally allocating resources, stabilize the general level of market price, protect the lawful rights and interests of consumers and managers and promote the sound development of a socialist market economy".*
- Article 6 *"Commodity prices and service prices, with the exception of those whose prices shall be guided or fixed by the government under Article 18 of this Law, shall be regulated by the market, that is, fixed by the manager on his own in accordance with this Law".*
- Article 7 *"The manager shall follow the principles of fairness, lawfulness and good faith in fixing prices".*
- Article 18 *"When necessary, the government may guide or fix the prices for the following commodities and services:*
  - *a very small number of commodities that have a vital bearing on the development of the national economy and the well-being of the people;*
  - *a small number of commodities for which resources are scarce;*
  - *commodities placed under natural monopoly;*
  - *important public utilities; and*
  - *important public welfare services.*"

- Article 23 *"For the setting of government guidance prices and government fixed prices for public utilities, public welfare services and commodities under natural monopoly that have a bearing on the immediate interests of the masses, a system for evidentiary hearing shall be established which shall be presided over by the government departments in charge of pricing and at which suggestions of consumers, managers and the other parties concerned shall be solicited and expounded as to their necessity and feasibility".*

135. The NDRC has issued a notice in 2025 stating that "the mechanism price [for new energy] shall be implemented in accordance with the current price policy and shall not be higher than the local coal-fired power benchmark price"[21]. This shows that energy remains subject to the pricing law, and that energy is subject to maximum pricing policies, indicating that prices are still significantly influenced by non-commercial factors.

136. The same NDRC notice from 2025 states that energy pricing should "adhere to classified measures, […] maintain policy connection to existing projects, and stabilise the expected benefits of incremental projects" and "adhere to overall coordination, and make concerted efforts in policies such as industry management, price mechanisms, […] and better support the realisation of the goals of the new energy development plan". This further demonstrates that energy pricing policy remains subject to national and industrial planning and remains a tool of the GoC to achieve its policy objectives.

[21] Notice on Deepening the Market-oriented Reform of New Energy Grid-connected Electricity Prices and Promoting the High-quality Development of New Energy, accessed 05 August 2026

137. In 2022, the NDRC released a press notice stating that 20% of electricity prices were not set by the market[22]. This demonstrates that even according to NDRC public statements there are large sections of the PRC economy that receive energy at non-market prices, and this is likely to indirectly affect the prices of all other energy users in a non-commercial way.

G2.1.2.4 Raw materials

138. Glass containers are primarily composed of the following raw materials: cullet (recycled glass), soda ash, silica sand, limestone. As stated in the section above regarding energy, China generally has a lower percentage of recycled content than glass from the Europe, and therefore uses a higher amount of other raw materials in the production processes (soda ash, silica sand, and limestone) of glass containers.

139. The Applicant alleges that the costs associated with raw materials to produce glass containers (limestone, silica sand, and soda ash) are distorted in the PRC, and do not reflect market-based value due to state control over the key raw materials, energy, and the capital required for their production.

140. In relation to the cost of raw materials in the PRC, the TRA has previously determined in AD0012 and AD0021 that a price difference exists due to non-commercial factors. This further indicates that industrial planning in the PRC systematically focuses on reducing the price of raw materials as a strategy to support encouraged industries.

141. The Applicant stated that "glass is a key input into the manufacture of the strategically important green energy sector for solar panels… which feature in the 14th Five Year Plan and the recommendations for the 15th Five Year Plan."[23] The Applicant also stated that "the 14th Five Year Plan targeted 1,000 metric tonnes carbon equivalent (Mtce); the 15th Five Year Plan will set an official target to install 3.6 TW of capacity for wind and solar by 2035.[24] Supporting this dramatic increase in solar capacity and production necessitates a high degree of state support throughout the supply chain. This includes the three main raw materials in glass production: limestone, silica sand and soda ash."

142. GoC plans and industrial strategies provide the political basis for programs which support industry in the PRC. Although these support programs are generally phrased in terms of aims and ambitions for the GoC rather than explicit actions, they form the basis for government support of industry in the PRC.

G2.1.2.5.1 Limestone and silica sand

143. The Applicant stated that the glass containers industry in the PRC benefits from GoC intervention in the limestone and silica sand industries.

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[22] China's pricing mechanism highly market-based: National Development and Reform Commission (NDRC) People's Republic of China, accessed 05 August 2026

[23] Climate and Capital Media. Clean Energy is the Cornestone of Xi Jinpings Five Year Plan. (https://www.climateandcapitalmedia.com/clean-energy-is-the-cornerstone-of-xi-jinpings-five-year-plan/), accessed 05 August 2026

[24] Carbon Brief. China briefing 30 October 2025. 15th Five year plan priorities. (https://www.carbonbrief.org/china-briefing-30-october-2025-15th-five-year-plan-priorities-2035-wind-goal-vehicle-to-grid-tech/).

144. Both limestone and silica sand are land-intensive commodities. Both are produced by traditional quarrying techniques as they are naturally occurring industrial minerals. As described in the section above (G2.1.2.2), land in China is allocated by the government according to strategic needs and not according to the market. Therefore, it is clear that the limestone and silica sand sectors will be impacted more significantly than many other sectors, given their reliance on land for their goods.

145. According to the Mineral Resources Law of China, Article 3:

"Mineral resources belong to the State. The rights of State ownership in mineral resources is exercised by the State Council. State ownership of mineral resources, either near the earth's surface or underground, shall not change with the alteration of ownership or right to the use of the land which the mineral resources are attached to."[25]

146. The applicant stated that, in effect, this allows the GoC to control all production and pricing in China to achieve key strategic objectives.

G2.1.2.5.2 Soda ash

147. The Applicant stated that the glass containers industry in the PRC benefits from GoC intervention in the soda ash industry.

148. This British Glass article states that "soda ash is one of the most expensive raw materials used in glass manufacturing & represents about 16% batch weight but about 60% of the batch cost". The synthetic production of soda ash relies on three major inputs: industrial salt (brine), limestone, and energy (coal/electricity).

149. In 2024, glass containers accounted for 10% of soda ash demand in China[26]. There is evidence that two of the main producers of soda ash, Lianyungang Soda Ash Co., Ltd[27], and Shandong Haihua Group[28], are SOEs.

150. The Applicant stated that further evidence of state influence is the bidding documents for a newly discovered trona (natural soda ash) reserve in Naiman Qi, Tongliao City, which have a clear mandate that the successful bidder from the June 2025 process must achieve 5 million metric tons of annual production within three years.[29]

151. The Applicant alleges that this state support has led to a significant oversupply of soda ash. China continues to increase capacity and '*recently added over 10 million tonnes in Inner Mongolia, creating a global surplus.*' In October 2025, an Indian soda ash

[25] Mineral Resources Law of the People's Republic of China (https://english.mee.gov.cn/Resources/laws/envir_elatedlaws/200710/t20071009_109919.shtml), accessed 05 August 2026

[26] OPIS Chemical Market Analytics. Soda Ash: Has China's Demand Peaked and When Will India's Surge Arrive? September 2024. (https://chemicalmarketanalytics.com/insights/has-chinas-demand-peaked-and-when-will-indias-surge-arrive/).

[27] Lianyungang Soda Ash Co., Ltd. (http://www.lygsoda.com/about_en.html).

[28] Lenovo presentation about the Shandong Haihua Group Co., Ltd. (https://www.lenovo.com/content/dam/lenovo/iso/customer-references-coe/global/en/case-studies/shandonghaihua/lenovo_shandonghaihua_casestudy.pdf).

[29] OPIS Chemical Market Analytics. Soda Ash: When Will Demand Catch Up to New Capacity? September 2025. (https://chemicalmarketanalytics.com/insights/soda-ash-when-will-demand-catch-up-to-new-capacity/).

producer, GHCL, applied to the Directorate General of Trade Remedies in India for an anti-dumping measure to protect Indian producers from this overproduction.[30]

152. The Applicant alleges that this situation has led the Chinese soda ash market to become increasingly insular. As reported by OPIS, '[*during] the first five months of 2025, exports from mainland China more than doubled, while imports fell by 98%'.*[31] This suggests that the conditions of competition within China are significantly different compared to other global producers, leading to the artificially low prices.

G2.1.2.6 Labour costs

153. The Applicant alleges that GoC intervention and the conditions of labour in the PRC causes the price of labour to be distorted in the glass containers market.

154. The TRA has determined in previous investigations that labour costs in the PRC reflect non-commercial factors. In AD0012, AD0021, and AD0047, the TRA found that government intervention distorted labour costs and that prices reflected non-commercial factors.

Labour costs – trade unions

155. The Trade Union Law of the PRC governs establishment and operation of labour unions, which significantly affects the ability of organised labour to demand higher wages[32]. Article 3 of the Trade Union Law states that all workers have the right to organise or join trade unions according to law, and that no organisations or individuals should obstruct or restrict them. However, article 2 states that "Trade unions are mass organizations of the working class under the leadership of the CCP", article 4 states how all trade unions must align ideologically and politically with the CCP, and article 32 states that trade unions should "strengthen ideological and political guidance for employees". Article 32 of the CCP constitution states that it "exercises leadership over the trade unions" within non-public sector entities in order to implement government policy.33 These articles show that all trade unions must be politically and ideologically aligned with the CCP, reducing the ability of workers to advocate for higher wages as it requires the support of the CCP.

156. PRC workers do not have the right to establish independent trade unions to organise wage negotiations because all unions are required to be organised under the oversight of the All-China Federation of Trade Unions (ACFTU).[34] The ACFTU consists of many local and grassroots trade unions, but all unions are subject to oversight by the ACFTU.

157. The ACFTU's history of supporting labour and providing suitable and competitive advocacy on behalf of workers is controversial. The China Labour Bulletin, a Hong

[30] Chemical Industry Digest. GHCL Urges Action Against Dumping of Soda Ash Imports (https://chemindigest.com/ghcl-urges-action-against-dumping-of-soda-ash-imports/).
[31] OPIS Chemical Market Analytics. Soda Ash: When Will Demand Catch Up to New Capacity? September 2025. (https://chemicalmarketanalytics.com/insights/soda-ash-when-will-demand-catch-up-to-new-capacity/).
[32] Trade Union Law of the People's Republic of China, Article 3, accessed 05 August 2026
[33] Constitution of the Communist Party of China, Article 32, accessed 05 August 2026
[34] Trade Union Law of the People's Republic of China, Chapter II Trade Union Organisation, accessed 05 August 2026

Kong based advocacy group, issued a report calling into question the independence of the ACFTU from CCP political influence,[35] highlighting that "*because the ACFTU's focus has been on its local unions, the numerous enterprise unions that it has set up have, more often than not, become mere empty shells, controlled or dominated by managements and unable to represent workers' interests*."

158. There are strong ties between ACFTU, the CCP, and company management. The Global Labour University (GLU), part of the International Labour Office, found that of the 1,811 union presidents surveyed within ACFTU companies[36].

159. These findings by the GLU show that despite the requirement in Articles 6 and 10 of the Trade Union Law of the PRC which mandate elections and democratic consultation[37], most union presidents of the ACFTU were CCP members who were part of company management and most gained their positions through undemocratic election processes. This indicates that the leadership of ACFTU members is highly likely to align with the goals of the CCP and company management to the detriment of worker demands for improved wages and working conditions.

160. In 1982, the official recognition of the right to strike was removed from the constitution of the PRC[38,39], which removed a key element of workers' collective bargaining power on wages. Article 290 of the Criminal Law of the PRC also states that "*Where people are gathered to disturb public order to such a serious extent that work in general, production, business operation, teaching or scientific research cannot go on and heavy losses are caused, the ringleaders shall be sentenced to fixed-term imprisonment*" and that "*active participants shall be sentenced to fixed-term imprisonment […], criminal detention, public surveillance or deprivation of political rights*"[40]. Several news outlets and research groups have reported on the arrest of labour activists in the PRC for labour protests and advocacy[41,42,43]. This shows that strikes that in the PRC can result in criminal prosecution, causing a chilling effect on industrial action and limiting the ability of workers to make demands of their employers.

161. The Trade Union Law states in article 23 that "*if an [organisation] violates labour laws and regulations and infringes upon the labour rights and interests of employees [...], the trade union shall represent the employees in negotiations with the [organisation] and demand that the [organisation] take corrective measures*" and article 28 states that "*When a work stoppage or slowdown occurs […] trade unions shall assist [organisations] in their efforts to restore production and work as quickly as possible*"[44].

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[35] Research Report into Worker Rights Promotion in China (No, accessed 05 August 2026
[36] All China Federation of Trade Unions: Structure, Functions and the Challenge of Collective Bargaining, accessed 05 August 2026
[37] Trade Union Law of the People's Republic of China, Articles 6 and 10, accessed 05 August 2026
[38] 2024 ITUC GLOBAL RIGHTS INDEX, accessed 05 August 2026
[39] Human Rights Council Universal Periodic Review on People's Republic of China, accessed 05 August 2026
[40] Criminal Law of the People's Republic of China, Article 290, accessed 05 August 2026
[41] Wu Guijun trial tests China's tolerance of workers' strikes, Financial Times, accessed 05 August 2026
[42] Prosecution of Labor Advocates Has Chilling Effect on Labor NGOs, Strikes Continue, Congressional-Executive Commission on China, accessed 05 August 2026
[43] China Arrests At Least Three Labor Activists in Shenzhen, Radio Free Asia, accessed 05 August 2026
[44] Trade Union Law of the People's Republic of China, Articles 23 and 28, accessed 05 August 2026

This shows that negotiations during labour disputes must use trade unions as employee representatives and that trade unions can be legally compelled to end industrial action, which further limits the ability of workers to demand higher wages and improved working conditions using industrial action.

Labour costs – hukou system

162. The household registration system, sometimes known as the Hukou system, is a legal registration system that records basic information about workers and registers PRC citizens either a rural or urban hukou. PRC citizens working outside the township of their household registration are often referred to as "migrant workers" and systematically have lower average wages than non-migrant workers employed in the same areas[45]. Migrant workers can apply for permanent residence registration for themselves and their family if they acquire enough points which can be earned by "legal and stable employment and legal and stable residence (including rentals), years of participation in urban social insurance, and years of continuous residence"[46], which encourages migrant workers to work in urban areas even if it is for very low wages so they can improve their chances of applying for an urban hukou.

163. Many employees work outside their township due to access to better public services such as improved education access, subsidised medical insurance and pensions, and widespread access to affordable housing with fixed standards and prices. The NDRC has stated that additional investment is needed to allow "*migrant populations to live and work in a city and enjoy the same public services as local residents with urban household registration*", that liberalising the system (i.e., increasing the amount of citizens with an urban status) is desirable but it would increase costs for businesses and government spending in both the short and the long term, and that "*completely liberalizing it in the short term is unrealistic*" so "*restrictions on household registration should be relaxed in an orderly and measured manner*"[47]. This demonstrates that migrant workers have access to inferior public services relative to local urban workers and that the GoC intends to continue to liberalise the system rather than abolish the hukou system altogether.

164. Several liberalisations of the household registration system have increased the number of urban hukou holders, but there continues to be a large migrant population. 63.9% of the population of the PRC resided in urban areas in 2020, yet only 45.4% of the population of the PRC had an urban hukou registration in 2020[48]. Research published by the world bank estimates that 300-400 million migrants live in urban

[45] 2024 Migrant Workers Monitoring Survey Report, accessed 05 August 2026
[46] Opinions of the State Council on Further Promoting the Reform of the Household Registration System, accessed 05 August 2026
[47] Zhao Junjie: Review of the Reform Process of China's Household Registration System, Reform Evaluation and Trend Judgment, accessed 05 August 2026
[48] Bulletin of the Seventh National Population Census [1] (No. 7) - Urban and Rural Population and Migrant Population - I. Urban and Rural Population, National Bureau of Statistics, accessed 05 August 2026

areas[49], and the National Bureau of Statistic reported in 2021 that approximately 500 million people had household registrations separate from their current residence[50].

165. Reforms to the system in 2022 removed hukou restrictions in cities with a population of less than 3 million, relaxed restrictions in cities with less than 5 million population, and introduced minor reforms to restrictions in cities with over 5 million residents[51]. This means that the effect of migrant workers on wages is concentrated in large cities although the impact of the hukou system on wages is not strictly limited to large urban areas. The Centre for Strategic & International Studies[52] states that "*centrally directed hukou reforms have largely been watered down by local governments and offset by more migration, suggesting that recently announced hukou reforms will have little effect on the millions of rural migrants in major cities*."

166. China Briefing researched the impact of the household registration system on the PRC's economy, and reports that "*since hukou restricts the free mobility of Chinese workers, it strains overall economic growth. These effects are exacerbated because the PRC has a shrinking workforce that peaked in 2011 and has decreased every year since then, leading to double-digit growth in labour costs*."

167. Employers do not have to pay social protection insurance for migrant workers if they have no contract of employment.[53] The National Bureau of Statistics reported that on 35.1% of migrant workers had a signed labour contract with their employer in 2016,[54] and the International Journal of Environmental research and Public Health indicates this number has increased to 47.7% in 2022.[55] This confers an advantage to the employer of reduced labour costs.

168. The hukou system consistently results in lower wages paid to migrant workers within professions.[56] The GLU found that migrant workers earned 20-50% less than urban workers in the same area of employment, and the Hong Kong University of Science and Technology found that migrant workers had a negative pay differential of between 8-36% relative to urban workers.[57]

169. The effect of the hukou system is that the labour markets which determined wages are affected by the non-commercial factor of the legal registration status of individuals in

[49] Internal Migration in China: Integrating Migration with Urbanization Policies and Hukou Reform (English), World Bank Group, accessed 05 August 2026
[50] Bulletin of the Seventh National Population Census [1] (No. 7) - Urban and Rural Population and Migrant Population- II. Migrant Population, National Bureau of Statistics, accessed 05 August 2026
[51] Notice of the National Development and Reform Commission on Issuing the Implementation Plan for New Urbanization in the 14th Five-Year, accessed 05 August 2026
[52] China's Hukou Reform in 2022: Do They Mean it this Time?, Centre for Strategic International Studies, accessed 05 August 2026
[53] Improving social protection for internal migrant workers in China, International Labour Organisation, accessed 05 August 2026
[54] Fewer of China's Migrant Workers Have Labor Contracts, Sixth Tone, accessed 05 August 2026
[55] Research on the Influence of Labor Contract on the Urban Integration of Migrant Workers: Empirical Analysis Based on China's Micro Data, accessed 05 August 2026
[56] All China Federation of Trade Unions: Structure, Functions and the Challenge of Collective Bargaining, accessed 05 August 2026
[57] Wage Discrimination in Urban China: How Hukou Status Affects Migrant Pay | Thought Leadership Briefs | Publications | HKUST Institute for Emerging Market Studies, accessed 05 August 2026

the PRC. The system either limits employment exclusively to workers with the correct hukou registration or introduces a tiered wage system for migrant and non-migrant workers.

170. Although the TRA has assessed that the labour market in the PRC reflects non-commercial factors, it has not made any adjustments in this area within this PAD. Further work will be conducted by the TRA within this investigation, to establish to what extent it may affect the production costs of glass containers in the PRC.

G2.1.2.7 Bank loans

171. The Applicant alleges that GoC intervention in the PRC causes the provision of bank loans to be distorted in the glass containers market.

172. In relation to finance costs, the TRA has previously determined in AD0021 that there is evidence that the loan interest rates reflect non-commercial factors, and as such there is a PMS within the optic fibre cable (OFC) industry. However, due to the low materiality in contributing to the AS&G costs, no adjustments were made in that investigation.

173. The TRA has found evidence of the predominance of state-owned banks within the PRC, and particularly the existence of the Export-Import Bank of China, which provides loans to support the export of goods produced in the PRC, including glass containers. The Applicant provided evidence of this area through the EC's SWD on distortions.

174. The EC's SWD on distortions also says that "In general, the Chinese credit ratings are heavily skewed towards the highest end of the rating scale. By the end of 2020, 96% of Chinese bonds were rated 'AA' or better, with 38% of credit bonds carrying an 'AAA' rating[58], while, for example, less than 10% of firms enjoy such top-notch ratings in the US market[59]".

175. The Applicant alleges that the result of this, is that almost all Chinese companies will be able to obtain preferential financial rates, including glass containers producers, and that this situation is exacerbated by the predominance of state-owned banks within China.

176. In the PRC, the banking system is largely controlled by the GOC[60] with preferential treatment given to SOEs[61].

177. The World Economic Forum writes that "SOEs are often criticised for abusing their preferential access to loans, and for lobbying for regulations which drive out competitive private companies". [62] It also states that that "the Chinese government is still keen on supporting SOEs and is committed to making them bigger, stronger and

[58] https://ch.allianzgi.com/-/media/allianzgi/globalagi/china-microsite/9-things-to-know/9-things-to-know-about-chinas-bond-markets.pdf, Accessed 14/08/2026
[59] https://www.sciencedirect.com/science/article/pii/S0378426617302352?via%3Dihub, Accessed 14/08/2026
[60] Crisis looms: The challenges facing China's banks and their global implications, Accessed 14/08/2026
[61] China's Financial System: the Tension between State and Market | Cato Institute, Accessed 14/08/2026
[62] World Econonmic Forum: The role of China's state-owned companies explained, Accessed 14/08/2026

more efficient. This is particularly relevant to certain strategic sectors where government oversight is essential."

178. Euromoney states that state-owned banks "are mandated to support the government's economic agenda" and that "state-owned banks are better positioned to support national priorities". [63]

179. Research published in the Economic Inquiry considers that there are 'two forms of SOE preferential arrangements–investment subsidies (a fiscal support) and privileged access to credits (a credit support)'.[64]

180. Whether a bank is a SOE, a joint-stock enterprise or seemingly independent, the PRC's General Rules on Loans 1996 gives local authorities the legal right to support preferential loans for preferred industries. Article 15 states that "[i]n Page 59 of 146 accordance with the State's policy, relevant departments may subsidise interests on loans, with a view to promoting the growth of certain industries and economic development in some areas." Similarly, article 12(5) of the PRC's Regulations on the Administration of Corporate Bonds (January 2011), states that all funds raised must be "in line with the national industrial policy," indicating that they are not issued according to market demand.

181. Whilst SPG Group reported that they had no bank loans during the POI, the TRA has reviewed Huaxing Groups' financing agreements and has found evidence of loans granted below the relevant Loan Prime Rate (LPR). The LPR is identified by the People's Bank of China (PBOC) as the lending rate charged by commercial banks to their most creditworthy customers.[58]

G2.1.2.8 Conclusions concerning the existence of PMS

182. In conclusion, we have found that the PRC economy systematically distorts prices in its domestic market due to widespread state support and central industrial planning, as well as the state-ownership and control of key aspects of the Chinese economy. We have also found that the price of land, energy, raw materials, labour costs, and bank loans used to produce glass containers in the PRC are influenced by non-commercial factors such as public policy, state-funded subsidies and investment, and targeted industrial planning which explicitly encourages certain industries at the expense of others.

183. Based on the evidence provided by the Applicant and case-specific research, the TRA considers there to be sufficient evidence to conclude that prices in the domestic glass containers market in the PRC reflect non-commercial factors as defined in regulation 7(4)(c). We have therefore concluded that a PMS exists in the PRC in respect to the glass containers industry.

[63] China's state-owned banks drive lending surge | Euromoney, Accessed 21/03/2025
[64] State-owned enterprises and entrusted lending: Economic growth and business cycles in China - Zhang - 2024 - Economic Inquiry - Wiley Online Library, accessed 17/03/2025

G2.1.3 Proper comparison

184. The TRA considered whether the PMS in the domestic market for glass containers in the PRC permits a proper comparison between the like goods destined for consumption in the PRC, and the goods concerned for the purposes of regulation 7(2)(b) of the Regulations. The reasons for the PMS finding are stated in G2.1.2 Assessing the existence of a PMS.

185. The TRA looked at the relative effect of the PMS on the goods concerned and the like goods sold domestically in the PRC. Evidence provided to the TRA by both sampled PRC exporter groups demonstrates that the goods concerned and the like goods sold on the domestic market in the PRC are produced using the same manufacturing process and in the same production facilities. Furthermore, based on questionnaire responses from the sampled overseas exporter groups, inputs for goods sold on both the domestic and export markets are consistent in terms of prices, suppliers, and volume.

186. Therefore, where the TRA has determined that prices reflect non-commercial factors or are artificially low, this has an equal effect on the like goods destined for consumption in the PRC and the goods concerned.

187. The TRA therefore considered whether there are other factors in the PRC glass containers market that prevent a proper comparison between the like goods in the PRC and the goods concerned. The TRA assessed the prevailing conditions of competition in the UK and the exporting country (PRC), and also the PRC's export VAT rebates on glass bottles.

188. The TRA has determined that the prevailing conditions of competition differ between the UK market and the PRC domestic market for glass containers.

189. Based on market research (Research and Markets, and Mordor Intelligence), the glass containers market size in the PRC (which also covers goods beyond the scope of this investigation, but is still indicative) is estimated at between 10.53-11.18 million tonnes in 2025, whereas the same sources estimated that the glass containers market size in the UK is estimated at between 2.35-3.13 million tonnes in 2025.

190. Data from Global Trade Tracker (GTT) at 6-digit (which also covers goods beyond the scope of this investigation, but is still indicative) shows that:

    a) The PRC exported 2.41 million tonnes of glass containers in 2025 (21.56-22.89% of its market). However, the UK only exported 240,332 tonnes in 2025 (7.68-10.23% of its market).

    b) The PRC only imported 11,677 tonnes of glass containers in 2025, which accounts for only 0.10-0.11% of its market size. However, as stated in section F2, all imports into the UK over the IP accounted for 11-14% of the UK market, and 0.8-1.6% of the UK market was from the goods concerned.

191. The differing conditions of each market are highlighted through the import and export levels of glass container products in each country. In the UK market, there is a larger

amount of competition through imports, with imports accounting for between 11-14%% of total trade in the UK, whereas imports into the PRC only account for 0.10-0.11% of total trade. Chinese imports into the UK make up between 0.8-1.6% of total imports, whilst UK exports to the PRC only constitute 0.11% of total imports. These figures were established using data from GTT and the HS6 codes' goods descriptions show that this data includes a range of glass containers, including products that are not included in the scope of this investigation: tubular glass, and glass containers with a nominal capacity of 2.5 litres of more.

192. Therefore, the TRA considers that the differing import and export levels between both countries suggest the UK market is more open and with a higher level of import penetration, while the PRC market is restricted, with fewer imports of the like goods.

193. Regarding the PRC's export VAT rebates on glass bottles, whilst this article suggests that this scheme was cancelled from 01 April 2026, and that the rebate was reduced from 13% to 9% under the 2024 adjustment, this was still in effect during our POI, and therefore directly impacted export pricing. Overseas exporters in the PRC could recover part of the VAT paid during production through the export tax rebate mechanism which directly reduced effective export costs and supported competitive pricing on global markets, including the UK.

194. PRC exports to the UK must compete at internationally competitive prices, with competition from both domestic UK and international producers. However, domestic sales prices in the PRC compete mostly with other domestic producers of the like goods who are also affected by the PMS identified in the glass containers domestic market. Exporters in the PRC can use their artificially reduced costs (including via the export VAT rebates on glass bottles) to gain UK market share from competitors who do not benefit from an artificially low-cost base due to the existence of a PMS.

195. In summary, the TRA has concluded that the PMS identified in the PRC domestic market for glass containers prevents a proper comparison between the like goods destined for consumption in the PRC and the goods concerned. The TRA determined that prices reflect non-commercial factors or are artificially low, and this has an equal effect on the like goods destined for consumption in the PRC and the goods concerned. The TRA concluded that the domestic sales price is affected by market conditions in the PRC, whereas the export sales price is affected by market conditions in the UK and the PRC's export VAT rebates on glass bottles. The prevailing conditions of competition are therefore materially different. It is therefore not possible to perform a proper comparison between the domestic price and the export price.

G2.2 Constructed normal value

196. As noted above, the TRA has determined that it is not appropriate to use the comparable price of the like goods in the PRC to calculate the normal value, in accordance with regulation 7(2) of the Regulations. Consequently, the TRA has used an alternative method to calculate the normal value.

197. The TRA has constructed the normal value of the goods in accordance with regulation 8(1) of the Regulations, which sets out that the TRA must, when it is not appropriate to

use the comparable price in accordance with regulation 7(2) of the Regulations, determine the normal value of the goods using one of the methodologies set out in regulation 8(1)(a) to (c). The TRA has, pursuant to regulation 8(1)(a) of the Regulations, determined the costs of production plus a reasonable amount for administrative, selling and general costs and for profits, in accordance regulations 11 and 12 of the Regulations.

G2.2.1 Costs of production

198. Where the TRA determines the costs of production for the purposes of regulation 8(1)(a) of the Regulations, it will do so in accordance with regulation 11 of the Regulations.

199. Where, in accordance with regulation 11(3) of the Regulations, the records of the overseas exporter are in accordance with Generally Accepted Accounting Principles (GAAP) in the PRC and reasonably reflect the costs associated with the production and sale of the like goods in the PRC, the TRA will, in accordance with regulation 11(2) of the Regulations, normally calculate the costs of production of the like goods on the basis of records kept by the overseas exporter.

200. Verification activities considered appropriate to assess the completeness, relevance, and accuracy of the information provided by sampled parties are ongoing at the time of drafting this PAD and Recommendation. The TRA is therefore, at this stage, unable to determine whether the exporters' records meet the requirements set out in regulation 11(3) of the Regulations.

201. Given that at the time of drafting this PAD, the TRA has not yet established whether the records of the overseas exporters meet the requirements as set out in regulation 11(3) of the Regulations, the TRA has calculated costs of production using a reasonable basis. As set out in regulation 11(6) of the Regulations, the TRA has powers to make adjustments in accordance with regulation 13 of the Regulations.

202. The reasonable basis applied by the TRA is using the sampled exporters' data (as reported in their questionnaire responses) as the basis to calculate the costs of production, and has then applied adjustments to the costs which the TRA has found reflect non-commercial factors, as per the findings set out in section G2.3 below.

G2.2.2 Administrative, selling, and general costs

203. Where the TRA determines a reasonable amount for administrative, selling, and general (AS&G) costs for the purposes of regulation 8(1)(a) of the Regulations, it will do so in accordance with regulation 12 of the Regulations.

204. Regulation 12(2) of the Regulations sets out that, subject to regulation 12(3) of the Regulations, the TRA must determine reasonable amounts for the AS&G costs based on the actual data pertaining to the production and sales by the overseas exporter of the like goods, in the ordinary course of trade, in the domestic market of the exporting country or territory. Regulation 12(3) of the Regulations sets out alternative methods

where the TRA cannot determine reasonable amounts in accordance with Regulation 12(2) of the Regulations.

205. Section G2.1.2 has identified that the price of land, labour, and bank loans in the PRC reflects non-commercial factors. However, for the purposes of this PAD, we have only considered whether the cost of bank loans are artificially low relative to a Brazilian benchmark, and the PRC average price (calculated as an average of costs from all the companies within both sampled exporter groups) in section G2.3.3 Bank loans. SPG Group reported that they had no bank loans during the POI, and therefore, for Huaxing Group, where we have decided that it is appropriate to make adjustments, they have been made in accordance with regulations 12(4) and 13.

206. Verification activities considered appropriate to assess the completeness, relevance, and accuracy of the information provided by sampled parties are ongoing at the time of drafting this PAD and Recommendation. As a result of that activity, data may be excluded or adjusted which could impact the conclusions and calculations included in the SEF and final determination.

G2.2.3 Reasonable level of profits

207. Where the TRA determines a reasonable amount for profits for the purposes of regulation 8(1)(a) of the Regulations, it will do so in accordance with regulation 12 of the Regulations.

208. Regulation 12(2) of the Regulations sets out that, subject to regulation 12(3) of the Regulations, the TRA must determine a reasonable amount for profits based on the actual data pertaining to the production and sales by the overseas exporter of the like goods, in the ordinary course of trade, in the domestic market of the exporting country or territory. Regulation 12(3) of the Regulations sets out alternative methods where the TRA cannot determine reasonable amounts in accordance with Regulation 12(2) of the Regulations.

209. The sampled exporters submitted domestic sales, CTM, AS&G, and profitability information relating to sales of the like goods in the domestic market. The TRA assessed whether domestic sales were made in the ordinary course of trade in accordance with regulation 9 of the Regulations.

210. The TRA assessed the representativeness and profitability of domestic sales and found that domestic sales were representative of export sales and that domestic sales made in the ordinary course of trade existed across multiple PCNs. Accordingly, the TRA considers that sufficient information exists to determine a reasonable amount for profit using the sampled exporters' actual domestic sales data in accordance with regulation 12(2) of the Regulations.

G2.3 PMS adjustments

211. Following its assessment of initial claims regarding the presence of a PMS and the receipt of questionnaire responses from interested parties and contributors, the TRA considered an appropriate benchmark country that could be used if it was determined

that a PMS existed in the PRC that prevented a comparison between the domestic and export prices of the goods.

212. On 10 April 2026, a note was published on the public file indicating that the TRA provisionally chose Brazil as the appropriate representative third country in this investigation. This was due to the availability of cost data and the similarity of economic development to the PRC, based on indicators such as gross national income per capita, and Human Development Index.

213. Interested parties were given a period of seven calendar days to provide comments on the proposed selection of benchmark country. The TRA received a submission from "GUANGDONG HUAXING GLASS CO., LTD." It argued that Brazil is not an appropriate representative third country for this investigation and that "Brazil fails to meet the requirements of data availability, comparability and stability." It then asserted that "India is the most appropriate country". The TRA reviewed this submission and determined that India does not have a similar level of economic development comparable to the PRC. This is because both Brazil and the PRC are classified as "upper-middle income" countries by the World Bank and high human development by the United Nations Development Programme, whereas India is classified as a "lower-middle income" country and a medium human development country. This indicates a materially different level of economic development.[65,66]

214. Having reviewed this submission, and based on the information available to the TRA, the TRA published a note to file on 21 April 2026, concluded that India is less appropriate than Brazil as a representative third country and not suitable benchmark for the purpose of this investigation.

215. We then invited Brazilian producers of glass containers to register to the investigation. However, no Brazilian producers registered to the investigation, and therefore the TRA has instead used facts available from secondary sources in place of submitted information from the benchmark country, in accordance with regulation 47 of the Regulations.

216. Under regulation 13(1) of the Regulations, where regulation 13(3) of the Regulations applies the TRA may make adjustments to the amounts determined in accordance with regulation 11 of the Regulations (costs of production) or regulation 12 of the Regulations (the amounts for administrative, selling and general costs and profits) for, as set out in regulation 13(2) of the Regulations, the purposes of calculating what the (sampled) overseas exporters' costs or profits would be in the PRC if costs, prices and profits in that market were substantially determined by market forces.

217. The TRA may make adjustments where paragraph 13(3) of the Regulation applies, and for the purpose of paragraph 13(2) of the Regulations. The purpose of making adjustments is to calculate exporter costs in the PRC if costs were substantially determined by market forces.

[65] World Bank Country and Lending Groups – World Bank Data Help Desk – assessed January 2026
[66] Human Development Index | Human Development Reports – assessed January 2026

218. The TRA has determined that the following costs are unrepresentative as they reflect non-commercial factors, as determined in section G2.1.3 and are material to the cost to make. It is therefore necessary to assess whether each cost would be materially different if determined by free market forces:

PMS Allegations	Adjustments made in the PAD?
State control over the economy	No
Land use rights	No
Energy (electricity, natural gas)	Yes (electricity, natural gas)
Raw materials (limestone, silica sand, soda ash)	Yes (limestone, silica sand, soda ash)
Labour costs	No
Bank loans	Yes *(Huaxing Group only)*

G2.3.1 Energy

219. The energy costs (including electricity and natural gas) submitted by the sampled exporter groups were compared against a relevant Brazilian benchmark and the PRC average price. The benchmark costs we have used in the dumping calculation relating to natural gas ($0.105/kWh converted to 0.745 RMB / kWh) and electricity ($0.123/kWh converted to 0.881 RMB/kWh) is from Global Petrol Prices, which shares the industrial prices of energy in Brazil in 2025. The corresponding PRC average prices are in the range of 0.28-0.36 RMB/kWh (natural gas) and 0.54-0.7 RMB/kWh (electricity).

220. The TRA compared the price of electricity and natural gas reported in the PMS energy annex (Annex 3) (as part of the questionnaire responses) for each company within the sampled exporter groups with the Brazilian benchmark and the PRC average price. This comparison showed that energy costs incurred by the sampled exporter groups were artificially low relative to the third country benchmark and PRC average price. Therefore, we have made adjustments to energy costs in accordance with regulation 13 of the Regulations.

221. All companies within both sampled exporter groups (except one) provided data for both electricity and natural gas separately, and therefore we applied adjustments to these sources of energy separately. However, whilst GUANGDONG HUAXING GLASS CO., LTD. (the exporter within Huaxing Group) provided separate electricity and natural gas costs in Annex 3, they didn't separate these out in Annex 1 and instead they reported one combined energy cost. Therefore, for the purposes of this PAD, as stated in section G2.1.2.3, as electricity accounts for around 20% of total energy costs, and as natural gas accounts for around 80% of total energy costs, we applied a weighted average adjustment to their combined energy costs.

G2.3.2 Raw materials

222. As explained in section G2.1.2.4, the TRA has determined that the prices of certain raw materials used to produce glass containers (limestone, silica sand, and soda ash) reflect non-commercial factors due to the existence of a PMS. The TRA has then

proceeded to consider whether the PMS had a material impact on the prices of these raw material purchases and are artificially low.

223. The raw material costs submitted by the sampled exporter groups were compared with Brazilian benchmarks and the PRC average. The Brazilian benchmark costs were identified using GTT 6-digit HS code total trade data[67]. The GTT benchmarks were selected based on relevant 6-digit HS codes submitted by the sampled exporter groups or based on facts available where this was not provided. The benchmarks were based on average price across the POI.

224. For soda ash (283620, disodium carbonate), GTT data showed that the average price over the POI was $226/tonne, which we converted to 1,621 RMB/tonne. This seemed reasonable compared to the average PRC prices, and therefore we used this figure in our adjustments. However, GTT data showed that the average prices of silica sand (250510, silica sands and quartz sands, whether or not coloured) and limestone was roughly 22,206 RMB/tonne and 269,580 RMB/tonne respectively. Neither of these prices seemed reasonable in comparison to the average PRC prices. Therefore, we used Procurement Resource which showed average costs for silica sand and calcium carbonate of 392.28 RMB/tonne and 2,642.10 RMB/tonne respectively. The corresponding PRC average prices are in the range of approximately 1050-1400 RMB/tonne (soda ash), 190-250 RMB/tonne (silica sand), and 150-200 RMB/tonne (calcium carbonate).

225. For both the sampled exporter groups, certain raw materials were found to be artificially low relative to the third country benchmark cost and the PRC average cost. Where it was found that the price of raw materials was artificially low, we have made adjustments to the relevant raw material costs in accordance with regulation 13 of the Regulations. These adjustments were made to reasonably reflect the relevant costs in a market that has costs determined by market forces.

G2.3.3 Bank loans

226. As explained in section G2.1.2.7, the TRA has determined that the provision of bank loans in the PRC reflect non-commercial factors due to the existence of a PMS. The TRA has then proceeded to consider whether the PMS had a material impact on the cost of bank loans and are artificially low.

227. SPG Group reported that they had no bank loans during the POI, and therefore, for Huaxing Group, the finance cost data was compared to a suitable Brazilian benchmark cost for finance as well as the PRC average price. The selected benchmark cost was based upon the average business credit interest rate during the POI, which was 21.06%. This rate was selected because, as defined by source linked above, “the business credit interest rate is the average interest rate on the loan products offered by commercial banks to non-financial corporations. The business credit is a credit specifically intended for business purposes including secured and unsecured business loans to small or large business with variable or fixed interest

[67] Global Trade Tracker Analytics, Country Level Tradeflows, accessed 03/03/2025

rate." The corresponding PRC average interest rate is in the range of approximately 2.15-2.85%.

228. The TRA compared this benchmark to the cost of finance incurred by Huaxing Group in the POI, and the PRC average price. The benchmark cost was higher than the cost of finance incurred by Huaxing Group, so we have adjusted the finance costs it incurred in accordance with regulation 13.

G.2.4 Further work to assess other costs against comparator values

229. Further work will be conducted after verifying the sampled exporter's data ahead of the SEF to determine the material impact of government intervention on prices so that the adjustments made in this PAD in relation to energy, raw materials (limestone, silica sand, and soda ash), and bank loans reflect the material impact as accurately as possible.

230. Having established that the below costs also reflect non-commercial factors, the TRA will undertake further work to assess the material impact of the government intervention detailed in Section G2.1. Particular market situation, and whether that results in prices being artificially low thus requiring further appropriate adjustments. The TRA will incorporate the findings into the SEF relating to:

- Land use rights; and
- Labour costs.

G.2.5 Other factors which may be causing the artificially low costs or prices

231. When considering differences in costs and prices between exporters and comparators, the TRA has consider whether there are any other factors which may be responsible for causing the artificially low costs or prices.

232. The TRA did not identify any other factors that could be causing the artificially low costs or prices. Therefore, the TRA does not believe there are any other factors that may account for the artificially low price between the PMS identified and prices being low.

G3. Export price

233. In accordance with regulation 15(1) of the Regulations, the export price is the price the goods concerned are sold for, or the agreed price at which they are to be sold, to either an importer in the UK, or a third party outside of the UK for export to the UK.

234. The TRA has determined the export price based on the agreed price at which they were sold to an importer in the UK in accordance with regulation 15(1)(a).

235. We have determined that the export prices submitted by both Huaxing Group and SPG Group during the POI were sufficiently reliable to be used in this investigation. We have not identified any association between the sampled exporter groups and the buyers that would have a material impact on the export price.

236. To ensure a fair comparison between the normal value and the export price, adjustments were made to the export price to make it at the same level of trade, namely the ex-works level, in accordance with regulation 16(2).

G4. Fair comparison

237. In accordance with regulation 16(1) of the Regulations, a comparison for the purposes of regulation 6(2)(c) of the Regulations must be made by reference to the same level of trade, normally the ex-factory level (ex-works), or where that is not possible such other level as the TRA considers appropriate and in respect of sales made as near as possible the same time.

238. In accordance with regulation 16(2) of the Regulations the TRA may make adjustments for any differences which affect price comparability including differences relating to:

a) conditions and terms of sale;
b) taxation;
c) levels of trade;
d) quantities;
e) physical adjustments.

239. The two sampled overseas exporter groups reported fair comparison adjustments to their sales data, specifically to adjust the domestic sales and the export sales to ex-works level.

240. For this PAD, the TRA made conditions and terms of sale adjustments to the export price of the two sampled exporter groups in order to adjust the export price to ex-works level. The TRA then reduced the ex-works price of the two domestic producers within each of the sampled exporter groups by deducting the selling costs associated with the related overseas exporters.

241. The TRA considered whether the fair comparison adjustments made to the domestic sales would also need to be made to the constructed normal value to be able to compare to the export price at the same level. For this PAD, as the constructed normal value has been calculated at an ex-works level, no adjustments for conditions and terms of sale, taxation, quantities, or physical characteristics were determined to be necessary to ensure a fair comparison.

242. Verification activities considered appropriate to assess the completeness, relevance, and accuracy of the information provided by sampled parties are ongoing at the time of drafting this PAD and Recommendation. As a result of that activity, data may be excluded or adjusted which could impact the conclusions and calculations included in the SEF and final determination.

G5. Provisional dumping margins

243. In accordance with regulation 17(1)(a) of the Regulations, and for the purposes of carrying out a fair comparison under Regulation 6(2)(c) of the Regulations, the TRA

compared the weighted average normal value with the weighted average export price for prices for all comparable export transactions to calculate the dumping margin for each sampled overseas exporter.

244. In accordance with regulation 37(2) of the Regulations, where the TRA has limited its examination of overseas exporters in accordance with regulations 56 or 57 of the Regulations, it must determine an estimated anti-dumping amount for non-sampled overseas exporters.

245. In accordance with regulation 37(3) of the Regulations, the dumping amount for cooperating non-sampled overseas exporters is calculated as the weighted average of the amounts determined for the overseas exporters in the sample.

246. For all other overseas exporters, the TRA established a residual amount in accordance with regulation 38 of the Regulations which has been determined by using a method of selecting the highest individual dumping margin for a sampled overseas exporter within both sampled exporter groups.

247. The provisional dumping margins are shown in the table below:

Table 3: Provisional dumping margins

Overseas exporter/producer	**Estimated Dumping margin (%)**
Huaxing Group, comprising of: a. GUANGDONG HUAXING GLASS CO., LTD.; b. FOSHAN HUAXING GLASS CO., LTD.; and c. FOSHAN CITY SAN SHUI HUA XING GLASS CO., LTD..	26.87%
SPG Group, comprising of: a. Shandong Pharmaceutical Glass Co., Ltd.; b. Baotou KONRE Pharma Glass Packaging Co., Ltd.; and c. Sichuan Chengxin Pharma Glass Co., Ltd..	24.65%
Non-sampled cooperating exporters/producers (see Annex 1)	25.88%
All other overseas exporters (residual dumping margin)	52.97%

Section H: Provisional findings on injury

248. 'Injury' describes when there is evidence of a UK industry being harmed by dumped goods. Paragraph 5 of Schedule 4 to the Act defines 'injury' to a UK industry in particular goods as:

    a) material injury, or the threat of material injury, to the industry, or
    b) material retardation of the establishment of the industry.

249. In accordance with regulation 27(2) of the Regulations, as the TRA has determined that goods have been or are being dumped into the UK, it must determine whether:

    a) a UK industry has suffered or is suffering injury in accordance with regulation 30 of the Regulations (determination of injury); and
    b) the dumped goods have caused or are causing that injury to that UK industry.

250. To determine whether a UK industry is suffering or has suffered injury from imports of the goods concerned, in line with regulation 30 of the Regulations, the TRA has examined four factors:

    a) the volume of the dumped goods during the injury period;
    b) the effect of the dumped goods on prices of the like goods in the UK market during the injury period;
    c) the consequent impact of the dumped goods on UK industry during the injury period;
    d) any other factors it considers relevant.

251. To determine whether the dumped goods have caused or are causing injury to UK industry, in line with regulation 35 of the Regulations, the TRA has also examined whether any known factors other than the dumped goods (other known factors) have caused or are causing injury to a UK industry. The TRA considered the following factors:

    a) The volume of goods from other markets
    b) Contraction in demand
    c) Trade restrictive practices and competition between exporters and the UK industry
    d) Developments in technology
    e) Export performance and productivity of the UK industry

H1. Injury analysis

252. UK producers were sampled for the purpose of the injury assessment as set out in Section F1 above. Each of the three sampled producers provided a satisfactory questionnaire response.

253. To conduct the injury analysis, the TRA has used the information relating to the UK industry that was provided in the questionnaire responses. Secondary sources of

information were also used in accordance with the Regulations, treated with special circumspection and, where practicable, verified using other independent sources. Secondary sources include, but are not limited to, official import statistics published by HMRC, and data pertaining to relevant markets.

H1.1 Volume of the dumped goods

254. In accordance with regulation 31 of the Regulations, when determining whether the UK Industry is suffering injury, the TRA has considered where there has been a significant increase in the dumped goods in the UK either in absolute terms (the volume of dumped goods being imported into the UK market) or relative to domestic production or consumption.

H1.1.1 Volume of dumped goods in absolute terms

255. The volume of imports of dumped goods increased in absolute terms over the IP. The PRC's share of total imports of glass container to the UK (by volume) also increased in absolute terms over the IP.

Table 4: Volume of dumped goods - country of origin

	2022	2023	2024	2025
PRC imported goods to the UK (tonnes)	20,410	36,021	33,763	33,679
PRC imported goods to the UK (indexed)	100	176	165	165
PRC goods as a share of total imports	7%	12%	13%	11%

Source: HMRC OTS Bulk Datasets.

H1.1.2 Volume of dumped goods relative to domestic production

256. During this time, the volume of UK produced like goods decreased by 18%, whereas the volume of imports of dumped goods increased by 65%.

Table 5: Volume of UK produced like goods

	2022	2023	2024	2025
Volume of UK produced like goods (indexed)	*100*	*83*	*80*	*82*
PRC imported goods to the UK (indexed)	*100*	*176*	*165*	*165*

Source: Confidential questionnaire responses from the sampled UK producers

H1.1.3 Volume of dumped goods relative to UK consumption

257. British Glass provided a summary of glassware being put onto the UK market according to the National Packaging Waste Database (NPWD). We compared this figure to imports and domestic industry figures and found it to be a reasonable indicator of UK consumption of glass containers.

258. This indicates that the market share of PRC goods increased by 101% over the IP, whilst the market share of the sampled UK producers declined by 7%. This was in the context of an 18% decline in overall consumption.

Table 6: Volume of dumped goods relative to UK consumption

		2022	2023	2024	2025
UK consumption of goods	(indexed)	*100*	*92*	*87*	*82*
Market share of goods concerned	(indexed)	*100*	*193*	*191*	*201*
Market share of sampled UK producers	(indexed)	*100*	*87*	*87*	*93*

Source: NPWD, HMRC OTS Bulk Datasets, and confidential UK industry questionnaire responses.

H1.2 Effect of dumped goods concerned on prices

259. In accordance with regulation 32 of the Regulations, to assess the effect of the dumped goods on prices of the like goods in the UK during the injury period, the TRA considered whether:

a) there has been significant price undercutting by the dumped goods as compared with the price of the like goods produced in the UK; or
b) the dumped goods have depressed or suppressed domestic prices of the like goods produced in the UK to a significant degree.

H1.2.1 Price undercutting

260. 'Price undercutting' is where the imported goods are consistently sold at a price below that of the domestically produced like goods in the UK.

261. An undercutting margin is calculated by comparing the UK sales price (ex-factory) with the import price (the landed price) for similar products during the POI. The 'landed price' is the price of the goods concerned when they arrive at a UK port. It equates to the CIF import price plus relevant import duties and other costs associated with importation.

262. An undercutting margin (%) reflects the extent to which landed prices of the imported goods concerned are lower than the UK sales prices of domestically produced like goods.

263. This assessment was undertaken at a PCN level by sampled exporter. This was to allow a fair comparison between phenotypically similar goods. We were not able to identify any PCNs in common to all sampled producers. We were able to identify four PCNs which were held in common between Huaxing Group, Ardagh, and Verallia. We were able to adjust CIF import value using customs and post importation costs from Pattesons to produce a landed price for each PCN. We were not able to conduct a satisfactory undercutting assessment for goods from SPG Group without a level of PCN collapsing (which was not possible given the timescale for preliminary calculations); although we were able to calculate an underselling amount for SPG Group as outlined in section H4. Provisional injury margin.

264. This assessment resulted in undercutting margins for four PCNs ranging from 10.1% - 52.5%. The weighted average of these produced an undercutting margin of 29.9%.

H1.2.2 Price depression

265. Price depression occurs when the UK industry is forced to reduce its prices to compete against lower priced dumped goods.

266. The sampled domestic industry's price per tonne increased between 2022 and 2023 before declining in 2024 and 2025. Whilst prices remained above the start of the IP, a decrease in profitability (discussed below) over the period suggests that the sampled domestic industry was unable to sustain the higher price levels it had achieved in 2023. This is consistent with the presence of competitive pressure from an external factor such as cheaper imports.

267. As established in price undercutting above, imports of goods concerned undercut the sampled domestic industry's prices for comparable goods during the POI. We have not been able to establish reliable price trends based on comparable goods for the whole injury period, so are unable to establish a definitive link between imports of the goods concerned and the decline in sampled UK producers' prices between 2023 and 2025.

268. We therefore do not assess that the UK industry suffered from price depression during the IP.

H1.2.3 Price suppression

269. Price suppression occurs where price increases for the like goods, which otherwise would have occurred, have been prevented to a significant degree due to the price of the goods concerned.

270. To assess whether there was any evidence of price suppression, the TRA examined changes to sales prices and the cost of production for the like goods produced by sampled domestic producers during the injury period.

271. Sampled UK producers' prices rose 46% between 2022 and 2023 and then decreased slightly towards the end of the IP, ending 19% above the start. However, PRC import prices decreased by 22% over the IP.

Table 7: Sales prices of sampled UK producers and PRC imported goods

		2022	2023	2024	2025
Sales prices of sampled UK producers	(indexed)	*100*	*146*	*128*	*119*
Sales prices of PRC imported goods	(indexed)	*100*	*60*	*71*	*78*

Source: HMRC OTS Bulk Datasets, and confidential UK industry questionnaire responses.

272. Energy, raw material costs, and wage costs are discussed in more detail in the 'Impact on the UK industry' section below. These sections will suggest that overall manufacturing costs increased considerably over the IP, largely driven by volatility in the wholesale energy market and to a certain extent its effect on raw material costs. This is reflected in a decline in profitability over the IP, discussed in more detail below.

273. Whilst we have not been able to undertake a quantitative analysis of costs over the IP, we assess that the rise in domestic sales price in 2023 was likely in response to an

increase in wholesale gas prices followed by a correction as the industry attempted to maintain market share.

274. This is supported by falling profitability indexes over the IP which suggest that the price rises that occurred were not sufficient to offset the increases in costs. This indicates that the prices of the sampled domestic industry did not increase to the levels that they would have needed to in order to maintain market position. We therefore assess that the industry has suffered from price suppression.

H1.3 Impact of dumped goods concerned on UK industry during the injury period

275. In considering, for the purpose of regulation 30(2)(c) of the Regulations, the impact of the dumped goods on the UK industry, pursuant to regulation 33, the TRA must take into account all relevant economic factors and indices having a bearing on the UK industry including:

a) actual and potential decline in sales, profits, output, market share, productivity, return on investments, and utilisation of capacity;
b) factors affecting domestic prices of the like goods;
c) the magnitude of the margin of dumping;
d) actual and potential negative effects on cash flow, inventories, employment, wages, growth, the ability to raise capital or investments.

276. Unless otherwise indicated, all assessments are based on the evidence provided by the sampled UK producers.

H1.3.1 Actual and potential decline in sales

277. Domestic sales value increased between 2022 and 2023 before declining until the end of the IP, ending 9% below the start. UK sales volume indicated a broadly declining trend, ending 24% below the start of the IP.

Table 8: UK industry sales value and volume

	2022	2023	2024	2025
UK industry sales value (indexed)	*100*	*116*	*96*	*91*
UK industry sales volume (indexed)	*100*	*80*	*75*	*76*

Source: Confidential questionnaire responses from the sampled UK producers

278. We assessed whether this increase in sales value in the context of decreased sales volume between 2022 and 2023 may have indicated a temporary availability constriction. We briefly compared these to import statistics to contextualise this factor.

279. Import figures indicated that global import volume increased slightly during the period whilst PRC industry imports increased by 65%. Therefore, it is likely that some sales were lost due to the increasing market share of PRC imports.

Table 9: Import figures to the UK

	2022	2023	2024	2025
Import volume, all countries (indexed)	*100*	*105*	*92*	*104*
Import volume, PRC (indexed)	*100*	*176*	*165*	*165*

Source: HMRC OTS Bulk Datasets

280. We also assess that UK capacity utilisation (discussed below) declined during this period, indicating that the UK industry would have been able to increase its output if there was an increase in demand.

281. These assessments suggest that the increase in sales value in 2023 was not a reaction to an availability constriction, and declining profitability (discussed below) indicates that an increase in sales value does not signify an advantage to the domestic industry.

H1.3.2 Actual and potential decline in profits

282. Profit margins for the UK like goods declined consistently across the IP.

Table 10: Profit for the UK like goods

	2022	2023	2024	2025
Profit margin for the sampled UK producers' like goods (indexed)	*100*	*97*	*84*	*78*

Source: Confidential questionnaire responses from the sampled UK producers.
NB: The figures here are indexed from a profit margin expressed as a percentage of profit divided by turnover. The indexed figures therefore do not reflect an absolute change in profitability, rather a change relative to the base year.

H1.3.3 Actual and potential decline in output

283. Output by both value and volume declined over the course of the IP.

Table 11: Output of the like goods

	2022	2023	2024	2025
Output value of the like goods (indexed)	*100*	*130*	*98*	*92*
Output volume of the like goods (indexed)	*100*	*83*	*80*	*82*

Source: Confidential questionnaire responses from the sampled UK producers.

284. Output volume declined 17% from 2022 and remained at that level for the remainder of the injury period, indicating that the sampled industry was producing considerably fewer goods at the end of the IP than the beginning.

285. These changes mirror the deterioration in domestic sales discussed above. As domestic sales declined more sharply, this suggests the decline in output was driven at least in part by weakening domestic sales performance.

286. Both output and sales values were temporarily supported by higher per-unit values in 2023, but the effect weakened over time.

H1.3.4 Actual and potential decline in market share

287. British Glass provided us with data estimating the size of the glass container market obtained from the NPWD for the IP. We compared NPWD data for the POI with registration form responses for domestic sales of like goods as well as HMRC OTS Bulk Datasets data for imports of the goods concerned and the like goods for the same period. We assessed that the NPWD data was a reasonable indicator of the size of the UK container glass market.

288. As shown in table 6 in section H1.1.3, the market share of PRC goods increased by 101% over the IP, whilst the market share of the sampled UK producers declined by 7%. This was in the context of an 18% decline in overall consumption.

H1.3.5 Actual and potential decline in productivity

289. Sampled UK producers' productivity declined between 2022 and 2023 and did not fully recover for the rest of the IP.

Table 12: Productivity

	2022	2023	2024	2025
Number of employees (Indexed)	100	102	94	93
Output per employee (indexed)	100	82	85	88

Source: Confidential questionnaire responses from the sampled UK producers. Please note that employee figure here is based on all employees, not just those associated with the like goods. This is to allow comparability between the three UK producer responses which used different methodologies to compile their data.

290. As discussed above, output fell in 2023. This coincided with a slight increase in employment that year, resulting in lower productivity that persisted to the end of the IP. Whilst employee numbers fell in subsequent years, this was not enough to allow productivity to recover to 2022 levels.

H1.3.6 Actual and potential decline in return on investments

291. The TRA did not receive consistent return on investment (ROI) figures from the sampled UK producers, so this factor could not be assessed with confidence. We are unable to publish redacted figures without undermining the confidential data of some producers.

292. This data suggests an approximate 10-20% increase in ROI in 2023 but ultimately showed an approximate decrease in ROI of 10-20% over the IP.

H1.3.7 Actual and potential decline in the utilisation of capacity

293. Capacity utilisation declined by 9% (indexed terms) over the IP.

Table 13: Capacity and Utilisation of Capacity

	2022	2023	2024	2025
Capacity	100	94	90	90
Capacity utilisation (indexed)	100	88	89	91

Source: Confidential questionnaire responses from the sampled UK producers.

294. Although capacity itself is not an indicative injury factor, its decline over the IP is consistent with an industry attempting to mitigate the challenges of injury. This is discussed in more detail in 'other factors considered' below.

295. In the context of an overall decline in capacity, the decline in capacity utilisation indicates that any mitigations undertaken by the domestic industry were insufficient to offset a more pronounced decline in output and that its production facilities were utilised less intensely at the end of the IP than at the beginning.

H1.3.8 Factors affecting domestic prices of the like goods

296. The price per tonne of UK produced like goods increased 46% between 2022 and 2023 but then decreased slightly for the rest of the IP, ending 19% higher than at the beginning.

Table 14: Prices of domestically sold like goods

	2022	2023	2024	2025
Domestic sales, value (indexed)	*100*	*116*	*96*	*91*
Domestic sales, volume (indexed)	*100*	*80*	*75*	*76*
Price per tonne (indexed)	*100*	*146*	*128*	*119*

Source: Confidential questionnaire responses from the sampled UK producers.

297. In the context of the consistent declines in sales volume over the IP, we assess that this increase in price is driven by the increase in value in 2023 followed by value declining slower than volume for the rest of the IP.

298. Were this increased value in 2023 a result of increased domestic demand for the goods (for example constrained imports or increased demand), we would expect a positive effect on volume. Instead, this pattern appears to indicate a meaningful increase in value for all UK producers followed by corrective action.

299. Narrative evidence from UK industry confirms that the increase in value represents an increase in price per tonne largely driven by increasing costs.

H1.3.8.1 Energy

300. All sampled producers cited an increase in the cost of energy during the IP. Trading Economics data indicate the dramatic fluctuations in gas prices following the outbreak of the Russia-Ukraine war.

Figure 2: Fluctuations in gas prices over the injury period

Source: Trading Economics, July 2026. IP indicated in red.

301. Energy intensive industries partially mitigate serious price volatility by purchasing energy in advance. However, changes in the global energy market necessarily affected the price of secured energy offerings as was evidenced by the domestic industry.

Table 15: Secured energy prices

	2022	2023	2024	2025
Gas	*100*	*122*	*178*	*198*
Electricity	*100*	*113*	*136*	*135*
Combined	*100*	*117*	*155*	*163*

Source: Confidential questionnaire responses from the sampled UK producers.

302. As energy represents between 8-20% of the cost of like goods for the domestic industry, this increase is likely to manifest itself in overall prices.

H1.3.8.2 Raw Material Costs

303. Sampled producers also noted that the raw material costs including post-consumer cullet and soda ash have increased substantially over the IP. As these are energy intensive to produce, process and ship, cost increases will have been at least partially driven by the increase and instability in wholesale energy prices.

304. As raw material cost represents between 18-45% of the cost of like goods, these increases are likely to manifest themselves in overall prices.

H1.3.8.3 Staffing costs

305. Some domestic producers referenced increasing staff costs which are broadly supported by wage and employment figures discussed below.

306. As direct labour costs represent between 20-30% of the cost of like goods, these increases are likely to manifest themselves in overall prices.

H1.3.8.4 Other cost factors

307. The industry also raised the UK's extended producer responsibility (EPR) scheme, transportation and inflation as factors which have contributed to the overall increased cost of like goods.

H1.3.8.5 Conclusion

308. At least one stakeholder expressly indicated that they were operating in an environment of increasing costs and that it had and would be necessary to pass these on to the end user by way of higher prices.

309. We assess that it is likely that that the price behaviour exhibited over the IP represents the industry compensating for increasing costs largely driven by the instability in wholesale gas prices at the beginning of the IP. We assess that the industry increased prices in the context of extreme volatility in the energy market and then corrected them once the worst fluctuations had stabilised in an effort to maintain market share. We assess that prices at the end of the IP indicate that costs of energy, staff, and possibly raw materials and EPR costs have not allowed prices to return to a competitive level.

H1.3.9 The magnitude of the margin of dumping

310. We indicated provisional dumping margins in Section G5 above. We note that dumping margins ranged from 17.53% to 54.40%.

311. The impact on the UK industry by the actual margin of dumping, which is deemed significant, cannot be considered to be negligible given the increasing volume and decreasing prices of imports concerned.

H1.3.10 Actual and potential negative effects on cash flow

312. We have not been able to assess cash flow because of gaps in evidence provided.

H1.3.11 Actual and potential negative effects on inventories

313. Inventories increased gradually over the IP.

Table 16: Stock volume

	2022	2023	2024	2025
Manufactured by the sampled domestic industry (indexed)	100	101	106	110

Source: Confidential questionnaire responses from the sampled UK producers.

314. Whilst this may indicate some accumulation of unsold inventory, it is not as pronounced as the decline in industry sales volume discussed above. This suggests that producers have broadly adjusted production to weaker demand.

H1.3.12 Actual and potential negative effects on employment

315. Sampled producer employment fluctuated slightly over the IP.

Table 17: Employment (FTE) over the IP

	2022	2023	2024	2025
FTE for the domestic industry (indexed)	100	102	94	93

Source: Confidential questionnaire responses from the sampled UK producers.

316. Employment figures were maintained until 2023, before declining 9% to the end of the period. This decline is less pronounced than the decline in sales and output discussed above, although this may reflect a lag as the industry allowed natural atrophy to reduce headcount to reflect a changing trade environment.

H1.3.13 Actual and potential negative effects on wages

317. Median wages for the sampled UK producers increased steadily over the injury period in the context of a slight decline in total employment numbers (FTE).

Table 18: Wages

	2022	2023	2024	2025
Total number of employees (indexed)	100	102	94	93
Median wages for employees (indexed)	100	107	111	114

Source: Confidential questionnaire responses from the sampled UK producers. Employee data is based on FTE of total staff numbers rather than staff associated with the like goods only.

318. We compared wage figures for employees associated with the like goods to total FTE figures because of a discrepancy between the methodologies the UK industry used to calculate the former. Whilst this is an imperfect comparison, an increasing median wage when compared to a decreasing headcount and decreasing productivity is consistent with an increase in staff costs.

H1.3.14 Actual and potential negative effects on growth

319. Domestic sales, output, and market share all declined during the injury period, indicating that the growth of the sampled UK producers was constrained.

320. We have not identified specific evidence of cancelled expansion projects or other foregone growth opportunities that it would have otherwise pursued. However, various economic factors decreasing over the injury period suggests that the trading landscape may not have supported investment or growth over the injury period.

H1.3.15 Actual and potential negative effects on the ability to raise capital or investments

321. The sampled UK producers did not formally comment on ability to raise capital or investments.

322. Overall investment figures have suggested a reduction in investment over the IP.

Table 19: Investments

	2022	2023	2024	2025
Investments for the like goods	100	122	70	42

Source: Confidential questionnaire responses from the sampled UK producers.

323. Whilst there is clearly a declining trend in investment associated with the like goods, we cannot assert that this is because of a negative effect on an ability to raise it. As such, whilst this is data is in keeping with negative effects on the ability to raise capital or investments, it does not itself indicate them.

H1.3.16 Summary of impact of dumped goods on the UK industry

324. The TRA has taken into account all relevant economic factors as part of its injury assessment, as set out in full above. We assessed that the UK industry showed a consistent pattern of injury as manifested through the 15 economic factors. We assessed that the industry demonstrated a decline in output, sales, and profits over the IP, directly indicating injury. These are contextualised by declines in market share, capacity utilisation, and return on investment (ROI) which are consistent with an industry failing to adapt to external pressures. Factors that affect price, employment, wages, and productivity all suggested an increase in costs which have translated into price increases that were not high enough to stabilise profitability, but were high enough to have a harmful effect on sales and market share. Finally, we note that whilst several factors were interpreted as being neutral, none of the factors assessed appeared to contraindicate injury.

325. The TRA is satisfied that the majority of the economic factors indicate that UK industry has suffered injury by showing negative developments in absolute and/or relative terms during the injury period and considers that these trends demonstrate that the UK industry has suffered and is still suffering injury.

H1.4 Other factors considered – Capacity

326. Whilst ‘capacity utilisation’ is a defined injury factor, ‘capacity’ itself is not. In questionnaire responses, the sampled UK producers indicated that at least one production line had been stood down for the majority of 2025 and 2026 so far. The industry indicated that this was a means to manage costs in an environment of declining sales.

327. We assess that this information broadly supports several of the factors discussed above to indicate that the industry is working to maintain market share in a competitive trading environment.

H2. Causation and non-attribution

H2.1 Causation

328. We assess that dumped goods undercut domestic prices by nearly 30% during the POI, that the UK industry experienced price suppression, and that profitability for the domestic industry fell consistently during the IP. This indicates that the domestic

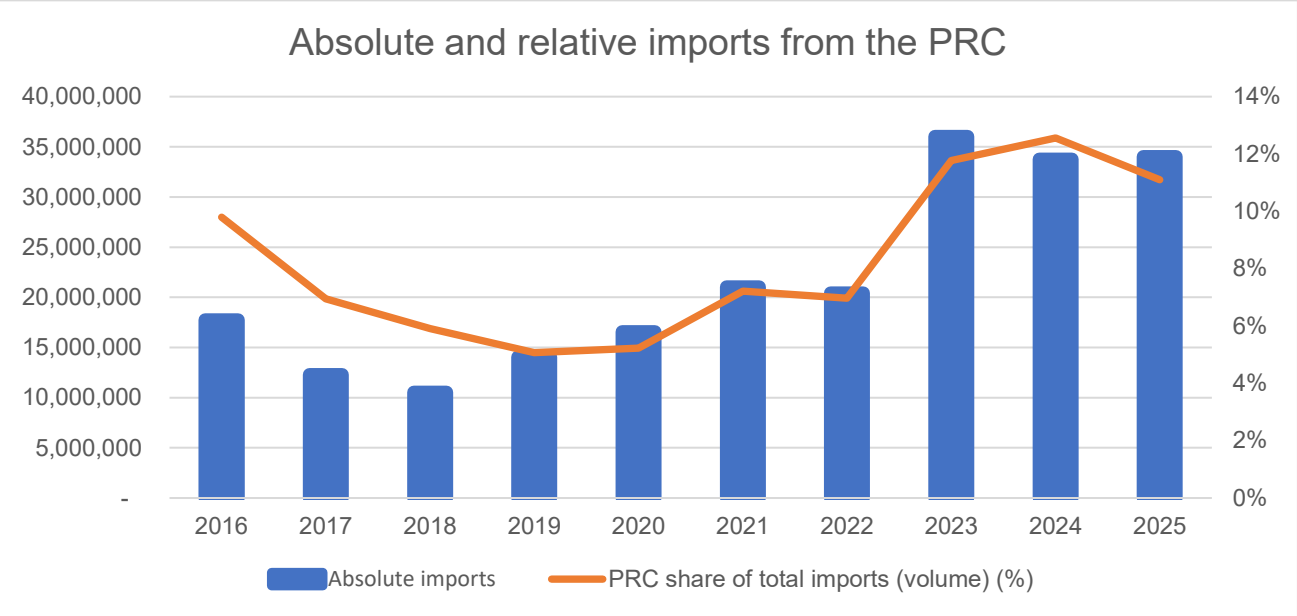
industry was not able to maintain the price levels they reached in 2023 without losing market share to dumped imports from the PRC.

H2.1.1 Imports from the PRC

329. We examined publicly available HMRC OTS Bulk Datasets for long term import volume and import share of goods concerned and compared them to domestic sales volumes for the UK industry.

330.

Figure 3: Absolute and relative imports from the PRC



Source: HMRC OTS Bulk Datasets

331. This shows an increasing trend of imports starting from 2018 and reaching a peak in 2023. This coincides with an increase in overall import share from 2019.

332. We compared the last four years of this data to market share information for the IP.

Table 20: Market and share over the IP

	2022	2023	2024	2025
Change in market for glass containers	100	92	87	82
Change in market share for sampled domestic producers	100	87	87	93
Change in market share for global imports	100	114	106	127

Sources: NPWD, HMRC OTS Bulk Datasets, and confidential questionnaire responses from the sampled UK producers.

333. Firstly, we assess that consumption of glass containers declined by 18% over the IP. During that time, the market share of sampled domestic producers declined by 7% whilst the market share of global imports increased by 27%.

Table 21: Imports from the PRC

	2022	2023	2024	2025
Change in imports of goods concerned (indexed)	*100*	*176*	*165*	*167*
Change in import share of goods concerned (indexed)	*100*	*182*	*184*	*214*
Change in market share of goods concerned (indexed)	*100*	*193*	*191*	*203*

Source: HMRC OTS Bulk Datasets

334. In this context, the PRC industry increased its imports of goods concerned to the UK (67%), its import share (114%) and its market share (103%).

335. We considered this in the context of broader changes to the market and imports which indicate that the market declined, but imports gained share at the expense of the sampled UK producers.

336. We assess that in the context of declining consumption, imported goods increased their market share at the expense of the UK industry.

337. The UK industry indicated that it began to note increased pressure from cheaper imports from the PRC from 2019, but the effect of COVID-19, which we understand was generally beneficial to the UK glass container industry, partially masked this in 2020 and 2021[68]. The sampled UK producers indicated that the effects of injury were more pronounced from 2023 onwards.

338. To this end, we assess that there has been an increasing trend of imports, import share, and market share of goods concerned coinciding with observations of increased competition from PRC industry goods. Combined with evidence of undercutting by the PRC industry, and evidence of declining profits and price suppression during the IP, we assess that the injury to the UK industry discussed above was caused in part by imports of the dumped goods concerned from the PRC.

H2.2 Non-attribution

339. In accordance with regulation 35 of the Regulations, injury caused by other known factors must not be attributed to dumped imports of the goods concerned. The TRA assessed whether any other known factors, other than the dumped goods concerned, caused or are causing injury to the UK industry.

[68] Source: Confidential domestic industry questionnaires.

H2.2.1 Volume and the prices of imports that are not dumped or subsidised into the United Kingdom from other markets

340. HMRC OTS data indicate that the goods concerned represented about 11% of all imports of glass containers to the UK over the IP, and was responsible for approximately 1.6% of glass containers consumed in the UK during that time.

341. Whilst the PRC doubled its market share from 0.8% to 1.6% over the IP, the fact that it gained only 0.8% market share whilst the domestic industry's loss of 3% during the same period indicates that share was also lost to imports from third countries.

342. HMRC OTS data indicates that the PRC represented the fourth largest importer of glass containers to the UK after France, Türkiye, and Germany. Together with Bulgaria, these five industries represented 64% of all imports of glass containers to the UK over the IP.

Table 22: Change in absolute volume of imports to the UK (indexed)

	2022	**2023**	**2024**	**2025**
France	*100*	*86*	*71*	*80*
Türkiye	*100*	*93*	*98*	*121*
Germany	*100*	*102*	*92*	*110*
PRC	***100***	***176***	***165***	***165***
Bulgaria	*100*	*112*	*119*	*137*

Source: HMRC OTS Bulk Datasets

Table 23: Change in UK market share (indexed)

	2022	**2023**	**2024**	**2025**
France	*100*	*94*	*82*	*97*
Türkiye	*100*	*102*	*113*	*147*
Germany	*100*	*112*	*106*	*134*
PRC	***100***	***193***	***191***	***201***
Bulgaria	*100*	*122*	*137*	*167*

Source: HMRC OTS Bulk Datasets

343. Of these, Germany, Türkiye, and Bulgaria also increased their volume of imports and increased their share of the UK market over the IP although to a lesser extent than the PRC.

344. We have no evidence of any price effects for goods from Germany or Bulgaria to suggest their goods may be contributing to the injury of the domestic industry. In isolation, we do not assess that an increase in their imports, import share, or market share are significant drivers of injury to the UK industry.

345. The TRA has initiated a separate investigation into an allegation of subsidised goods from the Republic of Türkiye, AS0088. These allegations include a challenge that subsidised goods have also caused injury to the UK industry.

346. Given this investigation has been determined to have sufficient merit to initiate, we assess that is possible that subsidised goods from Türkiye may also be a contributor

towards injury to the UK industry. We assess that the scale of Turkish imports, import share, and market share are not so large that injury caused by them would break the causal link between the dumped goods concerned from the PRC and injury to the UK industry.

347. This indicates that whilst there may be other imported goods that could have contributed to the injury of the UK industry, none are so prominent that they break the causal link with the dumped goods concerned from the PRC.

H2.2.2 Contraction in demand

348. NPWD data indicates that there was a decline in consumption of glass containers over the injury period.

Table 24: Consumption of glass containers over the IP (tonnes)

	2022	2023	2024	2025
NPWD indicators of consumption	2,563,673	2,347,211	2,218,142	2,106,966
Change	*100*	*92*	*87*	*82*

Source: NPWD

349. We have considered the change in consumer behaviour around the COVID-19 restrictions and changes to manufacturing and purchasing behaviour in the light of increased environmental and extended producer responsibility tariffs. Whilst both could be consistent with this decline in consumption, we have not been able to definitively explain this trend.

350. Were injury being driven by this factor, we'd expect the domestic industry to maintain share of a diminishing market. As domestic sales fell by 24%, and as the market share of the sampled UK producers fell by 7%, we assess that the decline in consumption may have contributed to the vulnerability of the market by reducing demand, but was itself not a driver of injury.

H2.2.3 Trade restrictive practices and competition between the overseas exporters and the UK industry

351. We did not identify any trade restrictive practices or competition between the exporters and the UK industry that would affect the cause of injury to the domestic industry.

H2.2.4 Effects of the COVID-19 pandemic

352. We note that the UK industry in the like goods was relatively sheltered from the broader contraction in UK manufacturing during the pandemic and may well have experienced increased demands because of changed domestic behaviour. We do not have evidence to benchmark the industry's pre-pandemic performance.

353. It is therefore possible that the decrease in UK consumption and the declines visible in several of the factors discussed above, may at least in part represent some normalisation following a period of increased demand.

354. We assess that an increase in demand caused by the pandemic could manifest in an increase in various economic factors such as sales volume, output, capacity utilisation, and productivity. This said, this change in behaviour would not adequately explain the price suppression or the change in profitability over the IP, nor the increase in imports and market share from the PRC. It would also not adequately explain why a number production lines, all built before the pandemic, were stood down during the IP.

355. As such, whilst we assess that the COVID-19 pandemic may well have created some trade distortions that contributed to a decline in consumption, and have manifested to some degree in various economic factors, we do not assess that these are so strong that they break the causal link between the dumped goods concerned from the PRC and the injury to the UK industry.

H2.2.5 Environmental and carbon costs

356. The sampled UK producers identified an increase in costs associated with a move to a low carbon economy. These included a need to increase investment in less carbon intensive technologies such as electric furnaces, an increase in the use of post-consumer cullet, carbon credits, and preparations for the forthcoming EPR scheme. The domestic industry also indicated that it was facing increased competition from other container types which were lighter and therefore less affected by weight-based tariffs as well as frequently being cheaper to transport and store. For example, drinks containers made of polyethylene terephthalate (PET) plastic, steel, or aluminium.

357. We assess that these factors are likely to contribute to the broader costs faced by the domestic industry. We have not received sufficient information to quantify these effects, but we have also not received evidence to suggest that these costs themselves are sufficient independently to cause material injury to the domestic industry.

358. We assess that these costs are likely to have contributed to higher prices discussed above, they do not explain the price undercutting of the goods concerned, the increase in imports from the PRC, nor the concurrent decline in sales, profitability or market share. We therefore assess that whilst these increasing costs may have contributed to the vulnerability of the UK industry, they are unlikely to be drivers of material injury.

H2.2.6 Developments in technology

359. The industry identified a move towards lower carbon manufacturing including more efficient furnaces. Whilst we acknowledge the industry's move towards efficiency, we have not received sufficient evidence that technological developments (or lack thereof) have materially affected the performance of the industry during the IP. We therefore consider it unlikely that developments in technology were a significant cause of the material injury observed in the domestic industry.

H2.2.7 The export performance and productivity of the UK industry

360. As detailed in the injury section above, we assessed that the UK industry needed to raise prices in response to increased costs early on in the IP and these price increases were cited as one of the reasons for the UK industry's loss of market share.

361. We note that the increases in prices were driven by increases in wholesale energy prices which fluctuated considerably over the IP but have subsequently settled to a level higher than they were before Russia's invasion of Ukraine.

362. We assess that whilst the volatility of the wholesale gas market has settled in the short term, the doubling of the ambient price per unit of gas in the long term will have a material effect on the cost per unit of manufacture. These costs must be borne by the industry or passed on to the consumer in the form of higher prices. This would make it more difficult to maintain market share and would make the UK industry vulnerable to the effects of increased and lower priced imports.

363. However, whilst rising costs may have made the UK industry vulnerable to downward pressure on prices, the impact of costs is not currently so great as to break the causal link between the dumped goods concerned and the injury to the UK industry.

H3. Conclusion

364. The TRA has completed a holistic assessment of all the evidence submitted by parties registered to this case, as well as data collected from official sources. We have concluded that the UK industry has suffered material injury during the IP, and the dumping of the goods concerned is causing injury to the UK industry in the like goods.

365. We determined that there has been an increase in import volumes from the PRC before and during the IP, and an increase in both imports and market share during a time of decreasing sales and market share for the UK industry.

366. We assessed that PRC goods undercut domestically produced goods during the POI by approximately 29.9%.

367. We determined that price depression was not likely to have occurred, but that price suppression did occur, as prices of UK produced like goods were not able to be raised to a level that would have allowed them to compensate for underlying increases in costs.

368. We assessed that the UK industry showed a consistent pattern of injury as manifested through the 15 economic factors, including output, sales and profits and contextualised by declines in market share, capacity utilisation, returns on in investment, factors that affect price, employment, wages and productivity.

369. We determined that imports from the PRC increased meaningfully from 2018 and increased both absolutely and in terms of import share and market share over the IP, undercutting the UK domestic prices in the POI and contributing to the injury of the UK industry.

370. We examined other factors including volume of non-dumped imports and a broadly increasing landscape of increasing costs. We assessed that it was likely that the UK industry was losing market share to exporting industries in addition to the PRC, but that this did not undermine the injury caused by dumped goods from the PRC. We assessed that increasing costs likely contributed to the vulnerability of the UK industry but were not themselves drivers of injury.

H4. Provisional injury margin

371. The injury margin is the extent to which the UK industry is being injured. The default method is to base the injury margin for each exporter on its underselling margin. This is calculated by comparing a benchmark UK price (the target price) with the import price (the landed price) for each PCN. The target price is the price that a UK producer would expect to sell its like goods at if it were not being affected by the dumped goods. The total amount of underselling is then expressed as a percentage of the total import value of the goods concerned. This method was used to calculate an injury margin for each cooperating exporter.

372. The TRA based these calculations on profit figures provided in the original application. These may differ from those used in subsequent assessments following verification.

373. The TRA calculated the injury margin for non-sampled cooperating exporters, which was the weighted average of the injury margins calculated for each of the sampled, cooperating exporters.

374. The TRA calculated a residual injury margin for overseas exporters that have not cooperated with the investigation. The TRA set the residual rate as the weighted average of the top four underselling rates for individual PCNs analysed as part of our underselling calculations. This comprised of two PCNs from each of the two PRC exporters.

Table 25: provisional injury margins

Overseas exporter/producer	Injury margin (%)
Huaxing Group, comprising of: a. GUANGDONG HUAXING GLASS CO., LTD.; b. FOSHAN HUAXING GLASS CO., LTD.; and c. FOSHAN CITY SAN SHUI HUA XING GLASS CO., LTD..	109.99%
SPG Group, comprising of: a. Shandong Pharmaceutical Glass Co., Ltd.; b. Baotou KONRE Pharma Glass Packaging Co., Ltd.; and c. Sichuan Chengxin Pharma Glass Co., Ltd..	76.54%
Non-sampled cooperating exporters/producers (see Annex 1)	83.05%
All other overseas exporters (residual injury margin)	129.31%

Section I: Economic interest test

I1. Economic interest overview

I1.1 Legislative framework

375. In accordance with paragraph 13(3)(a) of Schedule 4 to the Act, the TRA may recommend to the Secretary of State all importers of the relevant goods should be required to give a guarantee in respect of any additional import duty which would have been applicable, or potentially applicable, to the goods if an anti-dumping amount had been applied to the goods based on the PAD.

376. The EIT is set out in paragraph 25 of Schedule 4 to the Act and is, in accordance with paragraph 25(3) of Schedule 4 to the Act, presumed to be met unless the TRA or, as the case may be, the Secretary of State is satisfied that the application of the guarantee is not in the economic interest of the UK.

377. In line with paragraph 25 of Schedule 4 to the Act, the TRA has taken account of the following in conducting the EIT:

- the injury caused by dumping of the goods to a UK industry in the like goods and the benefits to that UK industry in removing that injury;
- the economic significance of affected industries and consumers in the UK;
- the likely impact on affected industries and consumers in the UK;
- the likely impact on particular geographic areas, or particular groups, in the UK;
- the likely consequences for the competitive environment, and for the structure of markets for like goods, in the UK; and
- such other matters as the TRA considers relevant.

I2. Injury caused by dumping and benefits to UK industry in removing injury

378. Section H sets out the injury assessment. This concluded that UK industry has suffered material injury.

379. Negative trends in profits, sales, productivity and employments suggest that the UK industry is suffering injury. The preliminary injury assessment concluded that the non-imposition of a guarantee would cause further injury to the UK industry.

I1.2 Stakeholder engagement and evidence submitted

380. The TRA has published registration forms, questionnaires, and submissions as described in section D4. Evidence from these has fed into the analysis in this section.

I3. The economic significance of affected industries and consumers in the UK

381. This section sets out the relative size and significance (using a range of metrics such as sales or turnover) of the affected industry and consumers. From the available evidence, the TRA identified the following groups could be potentially affected by the proposed guarantee:

- **Upstream businesses**: Suppliers of raw materials used to produce glass containers
- **UK producers** of glass containers
- **Importers** of glass containers
- **Downstream businesses**: Businesses that use glass containers to convey or package their goods.

382. There is some overlap between importers and downstream businesses. the TRA has grouped these businesses based on their principal activity and whether their activity has been confirmed through registration.

383. It was not feasible to investigate fully all known businesses given the number of total known stakeholders and case time constraints, so we looked at a selection from each group. For each selected business, we looked at published financial data from the past five years.

I3.1 Upstream businesses

384. Based on evidence submitted the TRA is aware of 37 UK-based upstream businesses. The main upstream industries in the supply chain include suppliers of cullet, sand, packaging materials and energy.

385. The TRA selected four UK upstream businesses from evidence submitted. However, two were small businesses with no published data available to be assessed. The selected businesses employed approximately 3,500 people and generated an estimated £219.4 million in gross value added (GVA). Analysis of financial data shows these businesses are likely to have medium vulnerability to shocks. Although they exhibit an increase in sales and employment, one business showed negative EBITDA margins and the other showed a sharp decrease in profitability and EBITDA margins during 2024.

386. On average, known sales to glass container producers represented significant proportion of their turnover suggesting that the product was very important to assessed upstream businesses.

I3.2 UK producers

387. The TRA is aware of six UK producers, five of which registered to the case. Beatson Clark, Verallia UK and Ardagh Glass were selected and returned producer questionnaires.

388. The selected UK producers employed approximately 2,100 people and generated an estimated £244.0 million in GVA. These businesses are likely to have low to medium vulnerability to economic shocks due to high EBITDA margins while one business showed a significant fall in revenue and operating profit over the period assessed. Analysis shows glass containers are very important to the sampled producers as sales of GC account for a significant portion of revenue.

I3.3 UK importers

389. The TRA received questionnaire responses from two importers and used HMRC's trader search to identify traders that imported the like goods under the 15 8-digit commodity codes. There were 2,016 businesses that imported goods under these codes during 2025. Of which 381 are likely to be Non-Established Taxable Person (NETPs).

390. The TRA selected five importers, the two importers submitting questionnaire responses and the top three importers by frequency during the POI. The assessed importers employed approximately 200 people and generated an estimated £16.4 million in GVA.

391. Of the sampled businesses identified through HMRC trader, more than half their import transactions were related to Glass Containers This suggests glass containers are very important to them.

392. These businesses are likely to have low to medium vulnerability to shocks. Three businesses showed positive financial trends over the period. However, profitability for the other two businesses declined while revenue increased.

I3.4 Downstream businesses

393. Downstream businesses include manufacturers in various sectors such as food, beverage and cosmetics. where glass containers are used to package or convey their products.

394. The TRA is aware of more than 3,000 UK-based downstream businesses. The TRA selected the nine businesses with the most known purchases of glass containers from participating producers and importers.

395. From recent accounts, the assessed downstream businesses employed approximately 46,000 people and generated an estimated £7.0 billion in GVA, making this the largest affected group by employment and economic activity.

396. The nine assessed businesses exhibited mixed financial trends, ranging from low to high vulnerability to economic shocks. Eight businesses showed positive financial performance trends, while one business demonstrated medium to high vulnerability, as its GVA and profitability have weakened since 2022. Overall, we have concluded that this group has a low level of vulnerability to economic shocks.

I3.5 Consumers

397. Although the TRA received limited evidence on consumers, research suggests consumers prefer glass containers more than any other type of containers due to sustainability and health benefits.[69] The TRA believes that glass containers are somewhat important to them overall.

Table 26: Summary table – Significance metrics for effected industries

Supply chain part	Upstream	UK producers	UK importers	Downstream
Total known businesses	37	6	2,016	more than 3,000
Total selected for assessment	4	3	5	9
Importance of glass containers to selected businesses	Very important (UK producer raw material purchases vs upstream business turnover)	Very important (revenue from the like goods vs total turnover for the business)	Very important (% of import transactions under the 15 commodity codes, import values vs total turnover for two importers)	Somewhat important. (like goods purchases as % of turnover)
Total employment of selected businesses	3,526	2,099	213	46,030
Total GVA of selected businesses(£m)	£219.4m	£244.0m	£16.4m	£7,013.4m
Total turnover of selected businesses (£m)	£768.9m	£707.7m	£108.9m	£21,823.6m
EBITDA margin for selected businesses, 5yr weighted average (%)	5%	17%	7%	18%
Estimated relative economic significance, when compared to other supply chain groups	Middle	Middle	Lower	Higher
Vulnerability to economic shocks	Medium vulnerability	Low to medium vulnerability	Low to medium vulnerability	Low vulnerability

Sources: Questionnaire responses, Companies House, and Dun & Bradstreet.
Methodology: The importance of glass containers to each of the groups was estimated using the comparison metrics set out in brackets for each group. GVA was estimated by summing operating profits, employment costs, depreciation, and amortisation. Average EBITDA margin was estimated by dividing the sum of operating profit, depreciation, and amortisation by turnover. The assessment of vulnerability to negative economic impacts was made by looking at financial data from the most recent years. Businesses excluded include: (i) where data was unavailable; (ii) where data presented anomalies; and/or (iii) where the business was judged to be to be less relevant for analysis.

[69] Consumers Choosing Products in Sustainable Glass Packaging – assessed August 2026

I4. The likely impact of the guarantee on affected industries and consumers in the UK

398. This section assesses the overall impact a provisional 6-month guarantee might have on affected groups. The TRA has examined the likely impact of changes in prices and quantities on affected industries and consumers under two scenarios: (i) if a guarantee is not imposed, and (ii) if a guarantee is imposed.

I4.1 Prices and quantities should a guarantee not be implemented

399. If no provisional measure is imposed, it is likely that the current status quo will be maintained and imports of PRC glass containers will continue to enter the UK market and lower-priced imports from PRC will likely continue to injure UK producers during the 6-month period.

I4.2 Prices and quantities should a guarantee be implemented

400. If a 6-month guarantee is imposed, it is likely that PRC producers will increase their prices by the level of the guarantee, this is likely to reduce imports from the PRC. The TRA expects UK demand will remain consistent, meaning domestic sales for UK producers and third country producers could increase.

401. It is less likely that UK producers will raise their prices in response to the measure. Evidence suggests that the price elasticity for glass containers varies by sector and because of the EPR; where large packaging producers and brand owners who put glass containers on the market pay waste management fees. Demand for pharmaceutical-grade glass containers is highly price inelastic due to strict regulatory certifications. But demand for glass containers in the beverage sector is likely to be more price elastic due to more readily available substitutes.

402. During the POI, imports of glass containers from PRC were small compared to domestic sales of UK producers as described in Section H. Therefore, the TRA estimates the impact on prices and quantities will be small.

I4.3 Likely impact on affected industries of the guarantee

I4.3.1 Upstream businesses

403. If demand for domestically produced glass containers increases as a result of lower imports from PRC, upstream businesses will likely benefit from increased demand for the raw materials associated with glass container production.

I4.3.2 UK producers

404. If a guarantee is imposed, the TRA would expect the UK producers' prices to remain unchanged, but they would probably experience a small increase in sales given the relatively small market share for glass containers produced in the PRC.

I4.3.3 UK importers, Downstream businesses, and Consumers

405. Importers relying on PRC glass containers may face higher costs and reduced demand during a guarantee period, with these costs likely passed on to businesses using glass containers. Short-shelf-life product manufacturers may be affected sooner. However, the TRA expects the overall impact to be small due to the relatively low level of PRC imports compared with UK domestic sales and imports from other countries.

406. Research indicates that increased production costs in the food and beverage sector are often passed on to consumers.[70] As a result, consumers of short-shelf-life products, such as dairy products, juices, and desserts, could face higher prices where brands rely on PRC glass containers.

I4.4 Summary

407. Table 27 provides a summary of the expected impacts from the guarantee.

Table 27: Summary of Impacts

Group	Expected impacts
UK Producers	**No change to small positive impact** - Temporary reduction of injury from dumped imports and improved ability to compete with PRC imports.
Upstream Businesses	**No change to small positive impact** – Potential for a small increase in demand for raw materials and other inputs if domestic production of glass containers increases.
UK Importers	**Small negative impact -** Higher costs for importers relying on PRC glass containers during the period of the guarantee
Downstream Businesses	**Small negative impact -** Small increase in packaging costs and possible switching to alternative suppliers or packaging materials. Potential increase in packaging costs for short-shelf-life products which rely on glass containers from the PRC.
Consumers	**Small negative impact–** Potential for a small increase in prices where increased costs are passed through the supply chain.

I5. The likely impact of the guarantee on particular geographic areas, and particular groups

408. This section explores how impacts of the proposed guarantee are likely to be geographically distributed and whether any particular groups might be disproportionately impacted.

[70] Squeezed food businesses forced to pass costs on to customers - Business Insider - accessed July 2026

I5.1 Likely impact on particular areas

409. The TRA has assessed the geographical significance of affected groups, using data on employment and working age-population, at the level of Travel to Work Areas (TTWAs).

410. For each TTWA with businesses involved in the supply chain for glass containers, the TRA estimated the percentage of local employment from affected businesses to identify any areas where the glass containers supply chain employs a significant percentage of the local workforce (more than 1% of the local working-age population).

411. The TRA used three sources for its employment analysis: the UK producer's and importers questionnaire responses (which includes data on site-level employment for the like goods), D&B business directory (which includes data on site locations and estimated employment for listed companies), and ONS data on working-age population by TTWA.

412. The TRA used D&B to estimate employment by site but scaled down these estimates wherever the sum of employment from all sites exceeded the total employment in the most recent published accounts. Where sites were listed without employment figures, the TRA assumed employees were distributed equally between all sites.

413. Upstream businesses, UK producers and importers are not significant employers in their respective TTWAs. This means that the guarantee is unlikely to have any disproportionate impacts on TTWAs where upstream businesses, UK producers or importers are located.

414. In the TTWA of York, one downstream business employs a significant share of the working age population. Questionnaires submitted suggests purchases of glass containers account for approximately 1% of their total revenue, indicating glass containers are somewhat important to this business. The table below shows socio-economic data for this TTWA.

Table 28: Socio-economic data for parts of the UK where glass container supply chain is an important employer.

Travel to Work Area (TTWA)	Job Density (2019)	Claimant Count (2020)	NVQ Level 4 Qualifications of above (2021)	Mean annual pay (full time earnings) (£) (2024)
York	0.87	2.89%	56%	£36,738
Decline of UK TTWAs (10 = least deprived)	7	10	10	9
UK	**0.87**	**5.30%**	**43.50%**	**£38,224**

Sources: ONS, LI03 Regional labour market: Local indicators for travel-to-work areas; ONS, Annual Survey of Hours and Earnings, Earnings and hours worked, work-based travel to work area: ASHE Table 11; and ONS, Annual Population Survey.

Notes: Deciles are calculated by ranking the TTWA from most deprived to least deprived and dividing them into 10 equal groups. These range from the most deprived 10% (Decile 1) of TTWAs nationally, to the least deprived 10% (Decile 10) of TTWAs nationally.

415. The TRA found TTWA (York) had a significant proportion of the working-age population employed by selected businesses (1.69%). However, the socio-economic conditions of the York TTWA itself are positive. York has above average indicators on income, job density and education levels. York also has below average unemployment. These indicators suggest a resilient labour market, where workers are unlikely to face difficulties finding employment, even during an economic shock. Given glass containers are a relatively small share of revenue, the TRA therefore concludes that the York TTWA is unlikely to be affected by the imposition or non-imposition of a guarantee on glass containers.

416. The TRA concluded that no geographic areas were likely to face disproportionate impacts as a result of the guarantee.

I5.2 Likely impact on particular groups

417. The TRA considered the likely impact on particular groups including those with protected characteristics as defined by the Equality Act 2010. The TRA has found no evidence to suggest that any particular groups would be disproportionately affected by the measure.

I6. The likely consequences for the competitive environment and the structure of UK markets

418. The assessment of the likely consequences for the competitive environment and structure of the UK market considers four factors:

    a) the impact on the number or range of suppliers;
    b) the impact on the ability of suppliers to compete;
    c) the impact on the incentives to compete vigorously; and
    d) the impact on the choices and information available to consumers.

419. Evidence suggests glass containers produced in the UK and the PRC are relatively homogeneous due to limited potential for differentiation. Minor surface and colour additives may result in some variation between glass containers for decorative and customisation purposes. However, the evidence submitted indicates that these additives do not significantly increase production costs.

420. The UK market comprises six domestic producers. HMRC trader search identified 2016 importers during the POI, while published HMRC Overseas Trade in Goods Statistics (OTS) shows that glass containers were imported into the UK from 62 countries during the same period. However, the TRA estimates that domestically produced glass containers account for the majority of UK demand.

421. A guarantee will likely make it easier for UK producers to compete with PRC imports however this will reduce competition in the market. The net impact is unclear, but it is unlikely to significantly alter the number or range of suppliers in the market.

422. As introduced in section D4, submissions suggested that PRC producers are able to supply at lower MOQs than UK producers. This could mean that a measure could reduce the ability for smaller customers to purchase more limited quantities of glass containers. However, the TRA does not have sufficient information on typical MOQs from either the UK or the PRC, or an understanding of the level of demand for smaller orders. The TRA also lack evidence on whether producers in other countries are able to supply lower MOQs. Consequently, the TRA is unable to estimate the potential extent of this issue.

423. There is no evidence to suggest that the ability of suppliers to compete or the incentives to compete vigorously would be affected if the guarantee is imposed.

I7. Other factors the TRA considers relevant

424. As part of the EIT, the TRA considers any other factors additional to those set out in the legislation which have implications in concluding whether the guarantee would be in the economic interest of the UK.

425. The TRA is aware of the EPR scheme introduced by Department for Environment, Food & Rural Affairs (DEFRA) as described in I4.1, where glass containers frequently result in highest per-unit cost because glass containers are significantly heavier than alternatives. Research suggests this fee is likely to passed on to consumers.[71] However, the TRA believes that imposition of the guarantee would not alter the EPR scheme's impact on consumers overall.

I8. Conclusions

426. The TRA recognises that the affected supply chain is economically significant, particularly for downstream businesses, UK producers and upstream businesses. However, the likely impact of the guarantee is expected to be limited over the provisional period. UK producers may experience a small reduction in injury and an improved ability to compete, while upstream businesses may see no change or a marginal increase in demand. Importers and downstream businesses that rely on PRC glass containers may face higher costs, and consumers may see no change or a marginal increase in prices where costs are passed through. The overall impact is expected to be small.

    Additionally, the TRA has not identified significant impacts on any geographic areas due to the measure. The guarantee is also unlikely to significantly alter the competitive environment in the glass containers market. No further evidence was received from interested parties suggesting that the guarantee would not be in the economic interest of the UK.

[71] Retailers are 'likely' to pass 80% of EPR costs onto customers - accessed July 2026

427. Having considered the evidence submitted by the relevant parties and all the factors listed in the legislation, the TRA does not consider the negative impacts to be disproportionate to the need to remove the injury caused to UK industry. The TRA therefore concludes that the EIT is met for the proposed requirement of a guarantee.

Section J: Summary of provisional findings and recommendation to require a guarantee

J1. Preliminary findings

428. In accordance with paragraph 11(1) of Schedule 4 to the Act, the TRA determined that:
- the goods concerned have been or are being dumped in UK; and
- the dumping of the goods concerned has caused or is causing injury to a UK industry in those goods.

429. The TRA is satisfied that, in accordance with paragraph 13(4) of Schedule 4 to the Act, requiring the guarantee in accordance with our recommendation is necessary to prevent injury being caused during the remainder of the investigation to the UK industry in the like goods and meets the economic interest, as established in paragraph 25 of Schedule 4 to the Act.

J2. Recommendation

430. In accordance with paragraph 13(3)(a) of Schedule 4 to the Act, the TRA recommends to the Secretary of State that all importers of the goods concerned should be required to give a guarantee in respect of the estimated anti-dumping amount given in Table 29 below.

431. In accordance with paragraph 14(1) of Schedule 4 to the Act, a recommendation of a guarantee under paragraph 13(3) is required to specify the goods and include: the form of the guarantee; how an estimated anti-dumping amount applicable to the goods should be determined for the purpose of calculating the amount of the guarantee; how the amount of the guarantee should be calculated; and the period during which the requirement to give a guarantee should apply.

J2.1 Form of a guarantee

432. The TRA recommend that the guarantee takes the form of a bank guarantee, a bond or cash in accordance with paragraph 14(2) of Schedule 4 to the Act.

J2.2 Amount of guarantee

433. The TRA has compared the dumping and injury margins calculated in this PAD. In line with paragraph 14(3) of Schedule 4 to the Act, the TRA's recommendation regarding how the estimated anti-dumping amount should be determined for the purpose of calculating the amount of the guarantee must be such that the estimated anti-dumping

amount does not exceed the margin of dumping or the amount which the TRA is satisfied would be adequate to remove injury to the UK industry if that amount is less than the margin of dumping (the lesser duty rule).

434. The guarantee should be calculated by applying the estimated anti-dumping amount as ad valorem duties to the CIF import value of the goods concerned.

435. The TRA recommend the following estimated anti-dumping amounts for calculating the amount of the guarantee, which are based on the lower of the dumping and injury margins calculated:

Table 29: Recommended provisional anti-dumping amounts

Overseas exporter/producer	Dumping Margin (%)	Injury margin (%)	Anti-dumping amount (%)
Huaxing Group	26.87%	109.99%	**26.87%**
SPG Group	24.65%	76.54%	**24.65%**
Non-sampled cooperating exporters/producers	25.88%	83.05%	**25.88%**
All other overseas exporters (residual amount)	52.97%	129.31%	**52.97%**

J2.3 Period of the guarantee

436. If the TRA's Recommendation is accepted, the Secretary of State will publish a Taxation Notice, in line with paragraph 15(5)(b) of Schedule 4 to the Act. This will give effect to the imposition of the guarantee. Affected importers will be notified that they need to set up the guarantee when first importing the goods concerned into the UK. A guarantee will be required during the period of the provisional remedy.

437. The TRA recommends that the requirement to give a guarantee ends six months from the day after the date of the publication of the Taxation Notice, or when the definitive remedy is implemented, whichever is sooner.

Annex 1: Summary of submissions on the public file received from interested parties and contributors

438. The tables below list the information submitted to the TRA by interested parties and contributors to date.

Table 30: Submissions from companies which submitted questionnaire responses

#	Interested party	Party Type	Type of information received
1	[Name withheld by request]		Application
2	ARDAGH GLASS LIMITED	UK producer	Registration Questionnaire
3	VERALLIA UK LIMITED	UK producer	Registration Questionnaire
4	BEATSON CLARK LIMITED	UK producer	Registration Questionnaire
5	PATTESONS GLASS LIMITED	UK importer	Registration Questionnaire
6	TRICORBRAUN LIMITED (Continental Bottle Co. Limited)	UK importer	Registration Questionnaire
7	THE BRITISH GLASS MANUFACTURERS CONFEDERATION	Trade association	Registration Questionnaire
8	Huaxing Group: 1) GUANGDONG HUAXING GLASS CO., LTD. 2) FOSHAN HUAXING GLASS CO., LTD. 3) FOSHAN CITY SAN SHUI HUA XING GLASS CO., LTD.	Overseas exporter	1.) Registration 1.) Questionnaire 2.) Registration 2.) Questionnaire 3.) Registration 3.) Questionnaire Comments (Brazil) Comments
9	SPG Group: 1) Shandong Pharmaceutical Glass Co., Ltd. 2) Baotou KONRE Pharma Glass Packaging Co., Ltd. 3) Sichuan Chengxin Pharma Glass Co., Ltd.	Overseas exporter	1.) Registration 1.) Questionnaire 2.) Questionnaire 3.) Questionnaire
10	Ministry of Commerce of the People's Republic of China	Foreign government	Registration Questionnaire

Table 31: Submissions from companies that didn't submit questionnaire responses

#	Interested party	Party Type	Type of information received
1	ENCIRC LIMITED	UK producer	Registration
2	STOELZLE FLACONNAGE LIMITED	UK producer	Registration
3	Croxsons	UK importer	Registration
4	AEGG LTD	UK importer	Registration
5	RAYWARE LIMITED	UK importer	Registration
6	TRICORBRAUN LIMITED (Neville and More Limited*)	UK importer	Registration
7	BERLIN PACKAGING UK LTD	UK importer	Registration
8	Hogan Lovells on behalf of Berlin Packaging, Continental Bottle, and Croxsons.	Legal representative for UK importers	Comments
9	THE WINE AND SPIRIT TRADE ASSOCIATION	Trade association	Registration
10	China Chamber of Commerce for Import and Export of Light Industrial Products and Arts-Crafts (CCCLA)	Trade association	Registration
11	Shandong Excel Light Industrial Products Co. ,Ltd	Overseas exporter	Registration
12	SHANDONG SANHUI GLASS CO.,LTD.	Overseas exporter	Registration
13	Shandong Hanbang Household Glassware Co., Ltd.	Overseas exporter	Registration
14	Zibo Comm-mountain Glassware Co,.LTD.	Overseas exporter	Registration
15	ZIBO MODERN INTERNATIONAL CO.,LTD.	Overseas exporter	Registration
16	ZIBO YADONG IMPORT AND EXPORT TRADE CO.,LTD	Overseas exporter	Registration
17	Shandong Injoy Houseware Co.,Ltd.	Overseas exporter	Registration
18	SGD Asia Pacific	Overseas exporter	Registration Comments (sample) Comments (goods)
19	SHENZHENSHI MUCIGUOJI DIANZISHANGWU YOUXIANGONGSI	Overseas exporter	Registration