Registration form for interested parties and contributors

Case No.: **AD0092**

Anti-dumping investigation

Suspension Polyvinyl Chloride (S-PVC) originating in China, Mexico and South Korea

Completed on behalf of (provide the name of your company):	**[Information Redacted for Confidentiality]**

(to note, we use the term "company" to include all forms of business organisation including partnerships and sole traders)

Note:

Please provide **two copies of your response to this form:** a **confidential** and a **non-confidential version.** Both copies must be returned to the TRA using the Trade Remedies Service.

When you have completed each form, indicate the **confidentiality** status of the document by placing an ☒ in the relevant box below and in the header of the form. We strongly recommend this questionnaire be completed on a computer, so this step is easy to complete.

☐ Confidential

☒ Non-confidential (will be made available on the public file: https://www.trade-remedies.service.gov.uk/public/cases/)

Deadline for response:	**21 August 2026**

☐ Confidential

☒ Non-confidential

Case team contact:	AD0092@traderemedies.gov.uk

Introduction

Registration of interest to the investigation

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

An interested party is either:
- a government of the foreign country or territory subject to the investigation;
- an overseas exporter, an overseas producer or an importer of the goods subject to the investigation;
- a UK producer of goods that are like the goods subject to the investigation; or
- a trade or business association representing one or more of the above parties.

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

Scope of the investigation

Goods concerned	Suspension polyvinyl chloride (S-PVC), not mixed with any other substance
Period of investigation (POI)	01 July 2025 to 30 June 2026

For further details, please refer to the *Notice of Initiation* on the public file: Trade Remedies Authority

Completing this registration form and pre-sampling questionnaire

To register to this case, you need to provide two copies of your response to this form: a confidential and a non-confidential version. Your non-confidential version should be as similar as possible to your confidential version except for the redaction of the confidential information.

Both copies must be returned to the TRA by 21 **August 2026** using the Trade Remedies Service Trade Remedies Service.

The non-confidential version of your registration form and pre-sampling questionnaire may be placed on the public file: https://public-file.trade-remedies.service.gov.uk/case/ad0092.

It is your responsibility to ensure that the non-confidential version does not contain any confidential information, which includes personal contact information, names and signatures. Please see the TRA's public guidance for further information on providing confidential information and non-confidential summaries.

All information provided to the TRA in confidence will be treated as confidential in accordance with regulation 45 of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 (the Regulations) and will not be disclosed (except in limited circumstance as permitted by regulation 46 of the Regulations) and will be stored in protected systems.

Request to complete a detailed questionnaire

If, on the basis of the information provided in this form, we determine that you are an overseas exporter or an importer of the goods subject to the investigation, or a contributor, we may ask you to complete a detailed questionnaire to inform this investigation.

If we consider it appropriate, we may only ask a sample of overseas exporters or importers to complete a detailed questionnaire. By submitting this completed registration form and pre-sampling questionnaire, you agree that you may be included in any such sample.

If your company is included in the sample, you will be asked to respond to the questions in the detailed questionnaire and to support the TRA in verifying your responses. This may involve the TRA carrying out a verification visit to your premises.

If you are an overseas exporter and indicate that you do not agree to possible inclusion in a sample, your company may be deemed not to have cooperated in the investigation. The TRA will base its findings for non-cooperating parties on facts available. This may result in an outcome that is less favourable to your company than if it had cooperated.

☐ Confidential

☒ Non-confidential

Section A: About your company

A1. Your company's activities

1. To determine your company's role for the purpose of this investigation, please select the most applicable option for your company. Please refer to the period of investigation (POI) defined on page 2.

Overseas producers and exporters

☐ [A1.1] During the POI, we both produced and directly/indirectly exported S-PVC from a country subject to the investigation to the UK.
Note: Please complete <u>sections A2, A3, and B</u>.

☐ [A1.2] During the POI, we produced S-PVC in a country subject to the investigation but did not export to the UK.
Note: Please complete <u>sections A2 and B</u>.

[Commercially Sensitive Information Redacted]
[Commercially Sensitive Information Redacted]

UK producers and importers

☐ [A1.4] During the POI, we produced S-PVC within the UK and imported S-PVC originating in a country subject to the investigation to the UK.
Note: Please complete <u>sections A4, A5, and B</u>.

☐ [A1.5] During the POI, we produced S-PVC in the UK, but we did not import any S-PVC.
Note: Please complete <u>sections A4 and B</u>.

[Commercially Sensitive Information Redacted]
[Commercially Sensitive Information Redacted]

Other

☐ [A1.7] Other.
Note: Please complete <u>section B</u>.

2. If you selected 'Other' [A1.7], please describe the activities of your company and your company's interest in this investigation in the field below.

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

No

A2. Production and domestic sales of S-PVC

Complete this section if you indicated under **A1** that **you are a producer of S-PVC in the countries subject to the investigation**.

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

N/A

5. Please provide your company's total production volumes and production capacity for S-PVC during the POI in the table below.

Total production volume (POI) [tonnes]	
Total production capacity (POI) [tonnes]	

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our guidance.

6. Please give details of all associated parties involved with the company in the production and sales (export and/or domestic) of S-PVC in the POI. Both natural persons (individuals) and legal persons (e.g. companies) are considered to be associated where they meet the definition of 'Related Persons' in regulation 128 of the Customs (Import Duty) (EU Exit) Regulations 2018.

Company name	Company location (city, country)	Activities	Relationship

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with our guidance.

7. If you do not export S-PVC to the UK either directly or via associated parties, please describe how your products are exported to the UK (e.g. traders).

8. Please provide the total of your domestic sales volumes and values of S-PVC produced by your company during the POI in the table below.

Total domestic sales volume (POI) [tonnes]	
Total domestic sales value (POI) (£)	

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our guidance.

9. Were there significant fluctuations in major input costs (such as raw materials or energy) across the POI, which had a material impact on the overall cost to make the goods? If yes, please provide details of these fluctuations.

10. Is your company or any of your associated parties related to any company in the UK, particularly the UK producer and/or any importers of S-PVC?

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

A3. Direct and indirect exports of S-PVC

Complete this section if you indicated under A1 that you are an exporter of S-PVC from **the countries subject to the investigation**.

12. If you are not the producer of S-PVC that you export to the UK, please provide details for your suppliers of the goods concerned and indicate whether these are the producers of the goods concerned in the table below.

Company name	Company location (city, country)	Relationship to your company	Producer (Y/N)
[Commercially Sensitive Information Redacted]	**[Commercially Sensitive Information Redacted]**	Supplier	Y
[Commercially Sensitive Information Redacted]	**[Commercially Sensitive Information Redacted]**	Supplier	Y
[Commercially Sensitive Information Redacted]	**[Commercially Sensitive Information Redacted]**	Supplier	Y

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with our guidance.

13. Please provide the total of your direct and indirect export volumes and values of the goods concerned to the UK during the POI in the table below.

Note: Exports to the UK via a third party (whether or not associated to your company), which is located in the countries subject to the investigation or a third country, are to be considered indirect exports.

Total direct export volume (POI) [tonnes]	**[Commercially Sensitive Information Redacted]**
Total indirect export volume (POI) [tonnes]	
Total direct export value (POI) (£)	**[Commercially Sensitive Information Redacted]**
Total indirect export value (POI) (£)	

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our guidance.

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

Company name	Company location (city, country)	Activities	Relationship

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with our guidance.

15. Please provide details of the commodity code(s) you export the goods concerned to the UK under in the box below.

39041000

A4. Production and sales of goods produced in the UK that are like the goods concerned

Complete this section if you indicated under **A1** that **you are a producer in the United Kingdom of goods that are like the goods concerned ('UK like goods')**.

16. Please describe the UK like goods that you produce in the UK.

17. Please provide your company's total production volumes and capacity for UK like goods during the POI in the table below.

Total production volume (POI) [tonnes]	
Total production capacity (POI) [tonnes]	

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our guidance.

18. Please provide the total of your domestic and export sales volumes and values of the UK like goods produced by your company in the UK during the POI in the table below.

Total domestic sales volume (POI) [tonnes]	
Total domestic sales value (POI) (£)	
Total export sales volume (POI) [tonnes]	
Total export sales value (POI) (£)	

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our guidance.

19. Were there significant fluctuations in major input costs (such as raw materials or energy) across the POI, which had a material impact on the overall cost to make the UK like goods? If yes, please provide details of these fluctuations.

20. Do you produce and/or sell other goods for the UK market other than the UK like goods?

A5. UK imports of the goods concerned

Complete this section if you indicated under **A1** that **you are an importer of the goods concerned from the countries subject to the investigation**.

21. Please provide the total of your import volumes and values of the goods concerned originating from the countries subject to the investigation to the UK during the POI in the table below.

Total import volume (China) (POI) [tonnes]	**[Commercially Sensitive Information Redacted]**
Total import value (China) (POI) (£)	**[Commercially Sensitive Information Redacted]**
Total import volume (Mexico) (POI) [tonnes]	0
Total import value (Mexico) (POI) (£)	0
Total import volume (S/Korea) (POI) [tonnes]	**[Commercially Sensitive Information Redacted]**
Total import value (S/Korea) (POI) (£)	**[Commercially Sensitive Information Redacted]**

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our guidance.

22. Please provide details for your suppliers of the goods concerned originating in the countries subject to the investigation in the table below.

Company name	Company location (city, country)	Activities (producer, trader, etc.)	Relationship

[Commercially Sensitive Information Redacted]	**[Commercially Sensitive Information Redacted]**	Producer	**[Commercially Sensitive Information Redacted]**
[Commercially Sensitive Information Redacted]	**[Commercially Sensitive Information Redacted]**	Producer	**[Commercially Sensitive Information Redacted]**
[Commercially Sensitive Information Redacted]	**[Commercially Sensitive Information Redacted]**	Producer	**[Commercially Sensitive Information Redacted]**

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with our guidance.

23. Please specify your purpose in importing the goods concerned from the countries subject to the investigation. Select **all** of the following options that are applicable to your company.

[Commercially Sensitive Information Redacted]

☐ We process the goods before reselling them to distributors or final customers.

☐ We use the goods as input in our production of ____________________________. (specify the product/s).

[Commercially Sensitive Information Redacted]

☐ Other.

24. "If you selected "other", please specify your purpose for importing the goods concerned from the countries subject to the investigation in the field below.

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

They are produced using Ineos and KemOne PVC technology from state of the art, efficient and well invested chloralkali and PVC plants. Mostly in CHINA.

As a result the quality of those products are considered as better or as a minimum comparable to UK produced goods.

There are several products supplied within this category which the UK production unit does not produce.

In PVC there are various ‘K’ values which relate to different grade types that are not produced in the UK at sufficient quality or quantity and will continue to need to be imported.
K60, K67, K68, K70, K80, K100 and all emulsion PVC resins.

26. Please provide details of the commodity code(s) you import the goods concerned to the UK under in the box below.

39041000

Section B: Additional information

B1. Other known companies

We need contact information in order to notify all other known companies who may be interested in taking part in the investigation and making their views known.

B1.1 Exporters, importers, and UK producers

27. Please provide contact details of any other known exporters and importers of the goods concerned or UK producers of the goods that are like the goods concerned (the UK like goods) in the table below.

Activities (exporter / importer / UK producer	Company name	Contact details (website/email/telephone)	Location(s) (if info is available)

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with our guidance.

B1.2 Upstream and downstream companies

28. Please provide contact details for UK companies from whom you purchase materials used to make the like goods (upstream companies) and/or UK companies who purchase the UK like goods from you (downstream companies) to help us obtain a more complete picture of the potential effects of a measure.

    You are not obligated to provide this information but we will use any details you provide to get in touch with these companies and improve our understanding of the impacts of any potential measure.

Activities (upstream / downstream)	Company name	Contact details (website/email/telephone)	Location(s) (if info is available)

Downstream	**[Information Redacted for Confidentiality]**.		**[Information Redacted for Confidentiality]**.
Downstream	**[Information Redacted for Confidentiality]**.		**[Information Redacted for Confidentiality]**.

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with our guidance.

B1.3 Any other companies

29. Please provide a list of any other known companies, including the nature of their company and any associations with other companies.

    This may include, for example, companies that are involved in the importation, distribution, or sale of goods that are like the goods concerned from third countries.

B2. Scope

30. If you consider that the description of the goods concerned for the investigation should be varied, please specify the suggested changes and provide your reasons in the field below.

The scope of the investigation should specifically relate to PVC products that are produced within the Newton Aycliffe, UK PVC facility.

This is K57 and K66 PVC resin grades only. Grades not produced at the UK site should be explicitly excluded.

All other K-values of suspension PVC resin and all emulsion PVC resins should be excluded from the investigation as they are not produced within the UK and therefore importation is essential to the functioning of the market.
This is important because local UK production does not appear to meet the full grade requirements of the UK converting industry. If products not made in the UK are included

within the scope, any measure would restrict essential imports without creating a realistic UK supply alternative, potentially leaving UK converters dependent on EU supply for grades that are not available locally.
This distinction is also important for causation. If the applicant's loss of position is not mainly attributable to imports from China, South Korea/LG Chem or Mexico, but instead to market-share movement towards EU origins, then broad measures against the investigated origins would not address the true source of any alleged injury.

31. Please provide any further remarks relating to the goods concerned and the goods that are like the goods concerned. Areas may include, for example: the interchangeability of different types of S-PVC.

K-values cannot easily be changed given longstanding recipes and specific K-values need to be maintained.

Emulsion PVC is not produced in the UK and should be excluded entirely.
For this reason, the TRA should avoid treating all S-PVC as fully interchangeable. A broad measure across grades that the UK site does not produce would not protect UK production of those grades; instead, it would reduce choice for UK converters and risk moving the market towards a narrow UK/EU-only supply position. This could materially harm UK manufacturing, including downstream businesses that are larger employers and contributors to UK tax revenue than the narrow upstream production activity that the measures are intended to protect.
This should be considered alongside the applicant's own market-share information. If that information shows that the UK producer has not materially lost share to China, South Korea/LG Chem or Mexico, but rather to EU origins, then the proposed measures would risk penalising necessary imports without remedying the alleged cause of injury.

B3. Product control numbers

The TRA uses product control numbers (PCNs) to define and distinguish the different types or subcategories of goods that fall under the goods description of the goods concerned. Subcategories are developed on the basis of differences in the physical and/or commercial characteristics of the goods which may impact the price at which each subcategory is sold.

PCNs, which come in the form of an alphanumeric code, help to create a categorisation system so that comparisons can be made between goods produced in the UK and those produced in the countries subject to the investigation.

We have created the following draft PCN table:

Description	PCN Descriptor
Suspension PVC, not mixed with any other substance	1

32. Please review the above draft PCN structure for this investigation and comment in the field below whether the PCN structure is adequate and appropriate to categorise the goods produced, exported and/or imported by your company.

Based purely on the HS code there is no way to exclude grades not produced at the UK facility.

The current HS-code approach is too broad and would not properly distinguish grades that are produced in the UK from grades that must be imported. In practical terms, this could materially damage UK converters by making them increasingly reliant on UK or EU-origin supply, even where the UK facility cannot meet the required grade range, quality or volume.
The PCN and scope analysis should therefore be linked to causation. Imports from the investigated origins should not be treated as injurious where they supply grades or volumes that the UK facility cannot provide, or where the applicant's own data indicates that any market-share loss has principally moved to EU production rather than to China, South Korea/LG Chem or Mexico.

33. Please provide details of any technical or physical characteristic not included in the PCN structure that may affect the price comparison between the goods concerned and the UK like goods.

The PCN structure should also capture whether the UK producer can actually supply the relevant grade commercially and competitively. Where the UK facility does not produce a grade, or cannot supply it at the required quality, quantity or cost level, imports should not be treated as directly injurious substitutes for UK production.
K-value
Densities
Black spec

34. If you are an overseas exporter or importer of the goods concerned or a UK producer of the like goods, please comment on whether the proposed PCN structure adequately aligns with your goods range. In particular, we would welcome your comments on whether you produce, or are aware of, any specialised products that fall within the definition of the goods concerned or the UK like goods which have a sufficiently different price point to make them unsuitable for comparison with the majority of goods.

The scope of the investigation should specifically relate to PVC products that are produced within the Newton Aycliffe, UK PVC facility.

This is K57 and K66 PVC resin grades only. **Grades not produced at the UK site should be explicitly excluded.**

All other K-values of suspension PVC resin and all emulsion PVC resins should be excluded from the investigation as they are not produced within the UK and therefore importation is essential to the functioning of the market.

Specifically below should be excluded:

K58
K60
K64
K65
K68
K70
K80
K90
K100

All extender, specialty grades not produced in the UK.

All emulsion PVC resins
Including these grades within the investigation would not remedy injury to UK production, because the UK facility does not appear to supply them. Rather, it would restrict necessary access for UK converters and could move the market towards an effective UK/EU-only supply structure, with limited competition and reduced grade availability.
This is a central causation point. Anti-dumping measures should only address injury caused by the investigated imports. If the grades concerned are not produced in the UK, or if any loss of UK market position has mainly shifted to EU-origin supply, then measures against China, South Korea/LG Chem or Mexico would not resolve the alleged injury and could instead harm UK converters.

35. Please provide details of any manufacturing process differences which you think may influence the PCN structure and the price comparison between the goods concerned or the UK like goods.

The UK facility appears to produce PVC using imported raw materials from outside the UK and EU, specifically from Norway.

On this basis, the cost structure and resulting margins of the UK PVC operation may not be directly comparable with imported alternatives, as a the major part of the overall value chain appears to sit outside the UK. The Norway supply entity remains very profitable based on publicly available data.

We respectfully suggest that this point is considered carefully, including whether any margin or value attributed to VCM production in Norway may affect the assessment of UK production costs and profitability.

Further analysis may therefore be helpful to understand the cost structure across the relevant INOVYN value chain, including where costs and profits sit between upstream VCM production in Norway and downstream PVC production in the UK. This would assist in ensuring that any assessment of UK production costs, profitability and injury is based on the full economic picture rather than only the UK conversion stage.

This is also relevant to competitiveness. If the UK PVC operation appears less competitive because of its cost base, the TRA should examine whether this reflects structural production costs and the allocation of value within the wider INOVYN chain, rather than injury caused by imports from China, South Korea or Mexico. In particular, any material profit sitting at the Norway VCM stage should be assessed before concluding that the UK PVC site has suffered injury from investigated imports.

The TRA should therefore test the causal link carefully. In particular, it should assess whether any alleged injury is actually caused by imports from China, South Korea/LG Chem or Mexico, or whether it is more accurately explained by EU-origin competition, the UK producer’s own cost structure, financing costs, grade limitations, or value allocation within the wider INOVYN chain.

We also respectfully suggest that the TRA should consider whether any high financing costs, debt structure or group financing arrangements affecting the UK producer have contributed to its reported profitability position. Such financing factors would be separate from import competition and should not be attributed to alleged dumping by producers in China, South Korea or Mexico without clear evidence of causation.

PVC is also a highly cyclical commodity, and profitability can vary significantly depending on the point in the cycle selected for comparison. For this reason, any assessment of injury should take account of normal PVC market cycles rather than comparing current performance only against an exceptional or peak reference period.

☐ Confidential

☒ Non-confidential

B4. Particular market situation and representative third country

The applicant has alleged that there is a Particular Market Situation (PMS) in the market for the goods concerned in China. The TRA will therefore assess whether such a PMS exists as part of its investigation.

36. If you consider that there is a PMS in China, please provide reasons and relevant information. This can include examples such as:

- Prices are artificially low;
- There is significant barter trade (e.g. goods exchanged for other goods);
- Prices reflect non-commercial factors; or
- Anything else.

We do not consider that the information currently available demonstrates the existence of a Particular Market Situation in China for S-PVC. Chinese S-PVC prices appear to be influenced by normal commercial factors, including feedstock costs, energy costs, plant efficiency, global supply and demand, inventory levels, export competition, freight and foreign exchange movements. Lower pricing, where present, should not in itself be treated as evidence of market distortion, particularly where producers may benefit from scale, integration, technology, or different production routes as well as significant investment.
We are not aware of any barter trade or non-commercial pricing practices affecting the S-PVC products imported by our company. In our view, any differences between Chinese, UK and other producers should be assessed through appropriate product, grade, K-value and production-route comparisons rather than by disregarding Chinese market data.

Chinese PVC producers produce PVC based on technology provided and licenced by EU PVC manufacturers.

Recent assessments by Indian authorities of Anti-dumping duties from CHINESE PVC producers found that no anti-dumping duty would be leveraged.

We also consider that the TRA should distinguish between low-cost or efficient Chinese production and alleged market distortion. The fact that Chinese PVC may be competitive does not itself demonstrate a PMS, particularly where the UK producer's own cost competitiveness may be affected by its upstream VCM sourcing and the allocation of profit within the INOVYN structure between Norway and the UK.
Injury and PMS should not be conflated. Even if Chinese PVC is competitively priced, the key question remains whether imports from China have caused material injury to UK

production. If the applicant's own market-share data shows that market share has moved mainly to EU origins rather than to China, South Korea/LG Chem or Mexico, that should weigh strongly against attributing injury to the investigated imports. In addition, cost and profitability comparisons should be treated carefully in a cyclical commodity market such as PVC. If the applicant seeks to rely on 2024 as a benchmark year, the TRA should consider whether that year was representative of normal market conditions or whether it reflected unusually favourable COVID/post-COVID market effects and exceptionally strong margins. A comparison against an abnormal peak year could overstate any alleged deterioration in performance. We therefore respectfully submit that the TRA should require clear, specific and evidence-based support before concluding that a PMS exists.

Consider redacting this information in your non-confidential version of this form, in accordance with our guidance.

If the TRA determines that a PMS exists and the effect of the PMS on the domestic sales price is that it is not possible to make a proper comparison between that domestic sales price and the export price, it may not use the domestic sales price for the purpose of determining normal value.

In such circumstances, the TRA may determine normal value using the costs of production plus a reasonable amount for administrative, selling, and general costs and for profits. The TRA may also make adjustments to those costs and profits using data from an appropriate representative third country. The TRA may make this adjustment if it determines that any relevant costs or profits of the overseas exporter are unrepresentative because they do not reasonably reflect the overseas exporter's costs or profits in a market if those costs and profits were substantially determined by market forces.

37. In the event that the TRA needs to make such adjustments, the applicant has proposed Maylasia as an appropriate representative country. The TRA is also considering Mexico as an appropriate representative country. Please provide any comments on either of the suggested representative countries.

We do not consider that Malaysia or Mexico should automatically be treated as an appropriate representative third country without a detailed evidence-based comparison to the Chinese S-PVC producers and products under investigation. In our view, any representative country should be comparable in terms of production route, feedstock basis, energy costs, plant scale, technology, product mix, K-values, domestic market conditions, export orientation and availability of reliable public data. Without this analysis, there is a risk that the selected country may produce an artificial or distorted normal value which does not fairly reflect the commercial reality of Chinese S-PVC production.

Malaysia and Mexico may have different cost structures, feedstock positions, plant economics, domestic market size and export dynamics compared with China. These differences could materially affect the assessment of production costs, SG&A and profit. We therefore respectfully submit that the TRA should only use either country if it can demonstrate, with clear evidence, that the data is reliable, representative and appropriately comparable to the goods and producers under investigation.
We also respectfully submit that, before relying on any third-country benchmark, it would be important to consider whether the UK producer’s own cost and profitability position fully reflects the relevant value chain and is globally economic. In particular, further analysis may be required to understand how costs and profits are allocated within the INOVYN structure between VCM production in Norway and PVC production in the UK.
It would be inconsistent to adjust Chinese costs by reference to a third country without also considering whether the UK producer’s reported cost and profit position is itself influenced by related-party value allocation across Norway and the UK. A fair comparison should consider the full economic chain, not only the UK PVC conversion stage.
Similarly, if the UK producer’s reported profitability is affected by financing costs, group treasury arrangements or debt-related charges, those factors should be analysed separately from production economics and import effects. High financing costs would not, in themselves, demonstrate injury caused by imports from the investigated countries.
The representative-country analysis should also not distract from the primary causation issue. Before adjusting Chinese costs by reference to Malaysia, Mexico or any other third country, the TRA should first determine whether imports from China, South Korea/LG Chem or Mexico are in fact the cause of any alleged injury, particularly where the applicant’s own information appears to identify EU origins as the main source of market-share movement.

38. In the event that you do not agree with either of the appropriate representative countries proposed and the TRA needs to make such adjustments, please suggest an alternative third country from which suitable cost and profit data can be obtained. Please explain your reasons for suggesting this country.

We do not propose an alternative representative third country at this stage. However, if the TRA considers that adjustment by reference to a third country is necessary, we respectfully suggest that it should first take into account the findings and outcome of the recent anti-dumping investigation conducted by the Government of India in relation to PVC imports from China.
In our view, that investigation may provide relevant and useful market context, including how another investigating authority assessed Chinese PVC producers, export pricing, cost conditions and dumping allegations in a comparable product market. We respectfully submit that the TRA should review those findings before relying on Malaysia, Mexico or

any other representative third country, particularly where the facts and market conditions may not be directly comparable to Chinese S-PVC production.
We also respectfully suggest that the TRA should consider the wider context of the Indian Government's current PVC investigation, including the treatment of Norway-origin PVC produced by the same upstream source as the VCM being supplied to the UK facility.

We respectfully note that, in this context, it may be relevant for the TRA to consider the Indian investigation into Norway-origin emulsion PVC reportedly produced from the same upstream VCM source as that supplied to the UK PVC facility. This may provide useful context when assessing the relationship between upstream input costs, downstream PVC production economics and the basis for any comparison with Chinese PVC.

In that context, we understand that Chinese PVC was not subject to anti-dumping duty, which appears relevant when assessing whether Chinese S-PVC costs and prices should be disregarded or adjusted by reference to a representative third country.
This appears particularly relevant where upstream VCM and downstream PVC production may sit in different jurisdictions within the same wider corporate structure. We respectfully suggest that the TRA should, where appropriate, examine whether any material profit or value attribution arises at the Norway VCM stage and how this affects the apparent cost base and profitability of the UK PVC facility.
The Indian investigation also appears relevant because, based on the information available to us, Chinese PVC was not subject to anti-dumping duty, while Norway-origin PVC was under investigation. This provides useful context when considering whether imports from China should be treated as the source of alleged injury, particularly where the Norway VCM/PVC value chain may be connected to the UK producer's cost structure.
This reinforces the need for a careful causation assessment. Where another authority has not imposed duty on Chinese PVC, and where the UK applicant's own data appears to show market-share movement mainly towards EU origins, the TRA should be cautious before concluding that Chinese imports are the source of material injury.
Any representative country used for adjustment purposes should be selected only on the basis of clear evidence that its cost and profit data is reliable, market-based and appropriately comparable to the Chinese producers and grades under investigation.

39. If you have suggested an appropriate representative third country, please provide contact details of a producer in that country who may be willing to participate in the investigation (if you have them).

B5. Other comments

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

As an overarching point, we respectfully submit that causation should be central to the TRA's assessment. Based on the information available to us, the applicant does not appear to have lost material market share primarily to imports from China, South Korea/LG Chem or Mexico. Rather, the apparent market-share movement appears to be mainly towards EU origins, particularly France and Germany. If this is correct, measures against the investigated origins would not address the actual source of any alleged injury and could instead restrict essential supply to UK converters.

We respectfully suggest that the TRA should consider the full upstream and downstream cost structure relevant to UK PVC production. In particular, further analysis may be helpful to understand where costs and profits sit within the INOVYN structure between VCM production in Norway and PVC production at the UK facility. This point may be important when assessing the true economics of UK production, profitability and any alleged injury, as the UK PVC operation may not capture the full value chain if a material part of the economic value is generated upstream outside the UK.

We also respectfully submit that any assessment of the UK producer's profitability should separate operating production economics from financing costs, debt structure or group financing arrangements. If high finance costs materially affect the UK producer's reported financial performance, this should not be treated as injury caused by imports unless there is clear evidence linking those costs to the investigated imports.

We also consider the limited range of PVC products produced in the UK to be a significant concern when assessing the wider UK interest. The UK production facility appears to produce only a narrow range of grades, while a number of important K-values and specialty grades required by the UK converting industry are not produced locally in sufficient quality or quantity. In addition, alternative supply from the United States is already restricted, which further limits the practical supply options available to UK converters.

In this context, imposing further anti-dumping duties on additional origins could materially narrow the UK market into an effective "UK or EU only" supply situation. We respectfully submit that this would be detrimental to the UK converting industry, which requires access to a broad and competitive range of PVC grades in order to remain globally competitive and to serve downstream customers effectively.

Such an outcome may reduce supply choice, increase input costs and leave UK converters without access to several essential grades that are not produced within the UK. This would risk making sections of the local converting industry economically uncompetitive against overseas converters who continue to have access to a wider and more competitively priced global supply base.

We therefore respectfully submit that the TRA should assess whether the practical beneficiaries of further measures would be UK-based industry as a whole, or whether the principal benefit may accrue to non-UK entities within a wider corporate and regional supply structure. In our view, measures that restrict access to essential PVC grades while primarily benefiting non-UK parts of the value chain would be contrary to the broader interests of the UK economy and the UK downstream converting sector.

We further understand that, based on the applicant's own market-share information, the UK producer does not appear to have lost material market share primarily to imports from China, South Korea/LG Chem or Mexico. The market movement appears to be largely towards EU origins, particularly France and Germany, which are understood to be part of the same wider production structure. If this is correct, it would be important for the TRA to treat this as a central causation issue and distinguish carefully between alleged injury caused by the investigated countries and market-share movement within EU-origin supply.

In our view, further duties on additional non-EU origins could therefore have the practical effect of limiting the UK market to UK or EU supply, despite the UK facility producing only a limited grade range and despite the apparent market-share movement being mainly towards EU supply rather than the investigated origins. This would not remedy the apparent cause of any market-share loss; instead, it could reduce effective competition, increase costs for UK converters and benefit non-UK EU production at the expense of the wider UK converting industry.

This wider economic impact is particularly important because the UK converting sector supports manufacturing employment, downstream investment and tax revenues in the UK. Measures which raise input costs or restrict access to essential grades could therefore damage a broader UK industrial base, while the principal commercial benefit may accrue to non-UK EU production rather than to UK manufacturing overall.

Finally, we respectfully suggest that the TRA should assess the applicant's performance over a sufficiently representative period. PVC is a cyclical commodity, and 2024 appears to have been an unusually favourable reference year for the sector, influenced by COVID/post-COVID market conditions and elevated margins. Using an exceptional peak year as the main comparator may not provide a fair assessment of normal competitive conditions or of any alleged injury during the period under investigation.

We further respectfully suggest that the TRA should consider the potential competition implications of any measure which, in practical market terms, materially limits UK PVC supply to a very small number of UK or EU-based sources. While we do not make any allegation of anti-competitive conduct, such an outcome could raise important public-interest concerns if it reduces effective competition, limits customer choice, and increases dependency on a narrow supplier base for grades that are essential to UK converters.

Consider redacting this information in your non-confidential version of this form, in accordance with our guidance.