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):	**Palram DPL Ltd**

(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**
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.

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 sections A2, A3, and B.

☐ [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 sections A2 and B.

☐ [A1.3] During the POI, we directly/indirectly exported S-PVC from a country subject to the investigation to the UK but did not produce S-PVC.
Note: Please complete sections A3 and B.

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 sections A4, A5, and B.

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

☒ [A1.6] During the POI, we imported S-PVC originating in a country subject to the investigation to the UK, but we did not produce any S-PVC in the UK.
Note: Please complete sections A5 and B.

Other

☐ [A1.7] Other.
Note: Please complete section B.

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.

BPF – British Plastics Federation

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.

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)

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]	
Total indirect export volume (POI) [tonnes]	
Total direct export value (POI) (£)	
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.

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]	Below 6500t
Total import value (China) (POI) (£)	Pricing not to be declared
Total import volume (Mexico) (POI) [tonnes]	0
Total import value (Mexico) (POI) (£)	
Total import volume (S/Korea) (POI) [tonnes]	0
Total import value (S/Korea) (POI) (£)	

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
Tianjin Bohua Chemical Development Co., Ltd.	Tianjin, China	Producer / supplier	PVC supplier to Palram through third-party traders
Axia Plastic UK Ltd		Trader / importer	Third-party trader through which Palram purchased S-PVC
Tricon Energy		Trader / importer	Third-party trader through which Palram purchased S-PVC

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.

☐ We resell the goods unchanged to distributors or final customers.

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

☒ We use the goods as input in our production of PVC sheets_________________________.
(specify the product/s).

☐ We reexport the good to third countries, namely____

☐ 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.

The imported S-PVC is used by Palram as a resin input in the manufacture of PVC sheet. Palram does not resell the S-PVC unchanged. Palram is a downstream UK manufacturer and procurement decisions are influenced by technical suitability, grade consistency, reliability of supply, availability and price. Where domestic supply was unavailable or could not meet the required delivery timing, alternative supply was required to maintain continuous PVC sheet production.

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

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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)
Importer / trader	Axia Plastic UK Ltd	redacted	United Kingdom
Importer / trader	Tricon Energy	redacted	United Kingdom

Add additional rows as required

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

B1.2 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)

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.

Palram does not currently propose a change to the basic S-PVC product description, but reserves its position pending review of the technical grades and characteristics actually used in PVC sheet production.

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.

Palram considers that technical grade, processing characteristics, consistency and availability can be commercially relevant to the suitability of S-PVC for downstream sheet production. Palram is reviewing whether a single PCN adequately captures differences that may affect comparability and price.

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.

Palram recommends that the TRA should not assume that all S-PVC covered by the proposed single PCN is commercially identical for all downstream uses. The suitability of a particular grade for sheet production can depend on technical and processing requirements, and these factors should be considered when assessing price comparability.

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.

specific grade / K-value / technical characteristics used by Palram that may materially affect price or suitability.

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.

Specialised products or grades used by Palram that may have a sufficiently different price point or technical specification

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.

Palram uses the imported S-PVC as a feedstock in downstream sheet manufacture. Manufacturing and processing requirements may make some resin grades more suitable than others; Palram is reviewing the relevant process and specification differences for the products it purchases.

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.

Palram is a downstream importer and user of S-PVC and does not have direct visibility of the Chinese domestic market sufficient to provide an independent conclusion on the existence of a Particular Market Situation. Palram therefore does not take a definitive position on this question at this stage.

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.

Palram is a downstream importer and user of S-PVC and does not have direct visibility of other domestic markets sufficient to provide an independent conclusion on the existence of a Particular Market Situation. Palram therefore does not take a definitive position on this question at this stage.

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.

N/A

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).

N/A

B5. Other comments

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

Palram DPL Ltd is a UK manufacturer of PVC sheet and uses imported S-PVC as a raw material rather than reselling the resin unchanged. During the POI, Palram purchased through two third-party traders: Axia Plastic UK Ltd and Tricon Energy. The S-PVC was used in Palram's UK sheet manufacturing. Palram also experienced documented instances where INOVYN was unable to supply or delayed deliveries due to material availability. Examples of this include: in December 2025 INOVYN advised that a scheduled S-PVC delivery would be delayed from 5 December to 15 December due to material availability. On 5 May 2026, INOVYN also advised that it was unable to cover a requested delivery that week and would only review availability for the following week. Palram considers this evidence relevant to the assessment of supply availability, causation and the potential impact of measures on downstream UK manufacturing. As S-PVC is a key raw material in our manufacturing process, Palram is unable to accept such delivery delays. Supporting correspondence can be provided to the TRA

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