Trade Remedies Authority

Safeguard Questionnaire (UK Producer)

Case SG0094: Safeguard investigation into imports of Poly(ethylene Terephthalate)

Period of Investigation (POI):	01 January 2021 to 31 December 2025
Deadline for response:	11 September 2026
Contact details:	SG0094@traderemedies.gov.uk
Completed on behalf of:	*Alpek Polyester UK Limited ("APUK")*

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

☐ Confidential

X Non-Confidential – will be made publicly available

Your completed response must comprise this questionnaire and the corresponding annex. Please note that you will have to provide a **Confidential** and a **Non-Confidential** version of both the questionnaire and annex, as well as any additional documents you append. All documents should be uploaded to the Trade Remedies Service by **04 September 2026**.

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Introduction

About us, this case, and this questionnaire

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

This case is investigating the allegation that Poly(ethylene Terephthalate) (PET) is being imported into the UK in increased quantities and under such conditions as to cause or is causing serious injury to the UK industry that produces like or directly competitive goods.

Why should I take part?

We are asking domestic producers to complete this questionnaire to help us understand the industry and market for this product and assess if a measure is needed.

The information your company provides will help us to reach a fair and proportionate decision. If information is not supplied within a reasonable time, the TRA will be free to make determinations on the basis of facts available.

How do I respond?

Detailed guidance on how to complete the questionnaire is provided in the instructions section below.

Please provide all the information requested by **04 September 2026**. We may need to issue a deficiency notice if we determine that the information supplied in the questionnaire is incomplete or inadequate. We may also send a notice requesting clarification or supplementary information if necessary. Therefore, please provide as much detail as possible in your responses.

Where can I find more information?

Our trade remedies guidance provides general information about our investigations and processes we follow.

If you have any specific questions relating to the case, now or while you're completing the questionnaire, please contact the Case Team at SG0094@traderemedies.gov.uk.

You can also find out more about the regulatory basis of our investigations. The TRA investigates cases under the provisions of *Trade Remedies (Increase in Imports*

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Causing Serious Injury to UK Producers) (EU Exit) Regulations 2019 and under *Schedule 5 of the Taxation (Cross-border Trade) Act 2018.*

Instructions on completing this questionnaire

Preparing your response

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

If you believe you will be unable to complete the questionnaire within the specified timeframe, you should contact the Case Team as soon as possible and in advance of the deadline, using the contact details provided on the cover of this questionnaire. Any request for an extension must set out the length of extension sought and provide detailed reasons explaining why the deadline cannot be met despite taking all reasonable steps to comply.

The TRA will consider extension requests on a case-by-case basis and will only grant extensions where sufficient justification has been provided, and does not significantly impede the progress of the investigation. We will notify you of our decision.

Where an extension is granted, we will publish a note on the public file recording both the request and the extension granted.

How to complete this questionnaire

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

Please also note the following points:

- Do not leave any questions blank. If the question is not relevant to your organisation, please explain why. If the answer to a question is “zero”, “no” or “none”, please write this.
- Please complete the spreadsheet annex as requested. If you feel you cannot present the information as requested, please contact your Case Team as soon as possible.
- Please provide all formulas and calculations used within your questionnaire response.
- If there is insufficient space in any part of the questionnaire to provide the details requested, or we ask for copies of additional information, please submit this information as appendices. Please ensure that any attachments are given a

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corresponding appendix reference in the title of the document and that these are referenced in the boxes provided.
- Any documents not in English should be accompanied by an English translation.
- Please provide all dates in the format DD/MM/YYYY (e.g., 23/05/2019).
- Unless otherwise stated, 'year' or 'calendar year' refers to the period 1 January – 31 December and 'quarter' refers to the associated three-month periods (e.g., 1 January – 31 March, 1 April – 30 June, etc).
- Identify all units of measurement and currencies used in tables, calculations and lists, if not provided by the corresponding instructions, and use units of measurement consistently (e.g., do not use kg and metric tonnes interchangeably).
- For all numerical figures, where appropriate please express every third number with a comma (e.g., '1,300' for one-thousand three hundred, '1,300,000' for one million and three-hundred thousand).
- Please limit all sales/currency/income figures to two decimal places, apply a full point as a decimal separator and use the appropriate currency symbol or abbreviation (e.g., £1,300.00).
- Provide all costing figures as actual amounts. Where actual amounts cannot be provided and you have reported standard costing instead, please indicate this in the relevant answer, and explain the variance from actual costs, if any.
- All figures should be reported net of recoverable tax unless otherwise stated.
- Please refer to the case number, **SG0094**, in any correspondence with the TRA.

Preparing confidential and non-confidential copies

You will need to submit one confidential version and one non-confidential version of your questionnaire and the corresponding spreadsheet annex by the due date. This is so that we can publish the non-confidential version of your information on our public file. Non-Confidential versions must contain non-confidential summaries of the information provided, or in exceptional circumstances, a statement of reasons why the information could not meaningfully be summarised. **Please ensure that each page of information you provide is clearly marked either "Confidential" or "Non-Confidential" in the header.**

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

In preparing your response, please note the following:

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

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

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

Providing information from subsidiaries or associated parties

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

Please note, both natural persons (individuals) and legal persons (e.g., companies) are considered to be associated where they meet the definition of 'Related Persons' in Regulation 128 of the Customs (Import Duty) (EU Exit) Regulations 2018.

- If any of your subsidiaries or associated companies are also a UK producer of like goods, they should **also** complete a Producer questionnaire. Please make sure you provide your subsidiaries with access to it.
- Where your subsidiaries or associated companies are not producers but are involved in the sales of the like goods and/or directly competitive goods, your questionnaire response should include information from those companies.

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

What happens next

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

- you will receive an email confirming the documents have been uploaded successfully;
- the Case Team will contact you if further information is required;

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- the non-confidential responses will be placed on the public file; and
- the Case Team may contact you to arrange a visit to authenticate the information contained in your responses.

Authenticating the information you supply

The TRA will authenticate, as far as possible, the information provided to it. As part of this process, we may conduct authentication visits or meetings. If we need to authenticate information that you provide by visiting your premises or arranging a meeting, the Case Team will contact you to arrange this.

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

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

Please indicate any dates in **October 2026** when you would be unable to host an authentication visit or meetings.

APUK is unable to accommodate verification between 1 and 12 October (inclusive) or between 26 and 30 October (inclusive) as key personnel will be unable due to overseas work commitments.
Appendix reference: NA

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

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The scope of this investigation

Goods concerned

The goods subject to investigation (the Goods Concerned) are:

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

The Goods Concerned are subject to the following commodity codes. These commodity codes are provided for information only:

3907 6100 3907 6900

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

Like goods

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

Directly competitive goods

This questionnaire asks for information about your company's production and sales of **directly competitive goods.** 'Directly competitive goods' means goods produced and sold in the UK which, although not 'like goods', directly compete with the goods concerned.

Please follow the instructions for each question to provide the appropriate information regarding the like goods, directly competitive goods or goods concerned. Instructions relating to the completion of the annexes can be found within the relevant annex.

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SECTION A: Company structure and operations

A1 Identity and contact details

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

Legal name of company:	Alpek Polyester UK Limited
Legal structure (e.g., limited company, sole trader, partnership):	Limited Liability Company
Year of establishment:	18 Dec 2009
Other operating names:	None
Company registration number:	7108602
Place of registration:	England
Name (point of contact):	[*Redacted – personal information*]
Position:	Commercial Manager
Address:	Davies Offices, Wilton International, Redcar, Cleveland, TS10 4XZ
Telephone No:	[*Redacted – confidential information*]
Email:	[*Redacted – personal information*]
Website:	www.alpekpolyester.com

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

Name:	Baker & McKenzie LLP
Address:	280 Bishopsgate, London EC2M 4RB
Telephone number:	[*Redacted – confidential information*]
Email:	[*Redacted – personal information*]
Confirm they have signed authority to act (Yes/No):	Yes – see application pack
	Appendix reference: NA

A2 About your company

1. Describe the role of your company in the UK market for the like or directly competitive goods, with a particular emphasis on activities regarding the goods (e.g., manufacturing processes, distribution of goods within the UK market).

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Please see application.
Appendix reference: NA

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

Date	Legal form	Explanation of change
NA	NA	NA

+Add additional rows as required.

A3 Organisational structure

Please answer the questions below about the internal structure of your company and any associations with other companies. Both natural persons (individuals) or legal persons (e.g. companies) are associated where they meet the definition of 'Related Persons' in Regulation 128 of the *Customs (Import Duty) (EU Exit) Regulations 2018*.

1. Please complete **Annex 1 – Associated companies** for your company's worldwide corporate structure and affiliations. Please see additional notes in the annex for assistance on how to complete it.
2. Please explain, or demonstrate in a diagram, the legal structure of your company showing the internal hierarchical and organisational structure, all sites/locations and departments which are involved in the production, sales, R&D, supply and distribution of the like and directly competitive goods for domestic and export markets.

See Appendix A3.2
Appendix reference: A3.2

A4 Board members and principal shareholders

1. Please complete the table below for any shareholder with >5% holding in the company who also has interest in any organisation related to the production, marketing, administration, and sale of the like or directly competitive goods in the UK or worldwide.

Name	Shareholding in company	Name of other companies in which person holds interest	Activity of other companies
[*Redacted – commercially sensitive information concerning APUK structure*]			

+Add additional rows as required

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

Name	Position on Board of Directors	Name of other companies in which person holds interest	Activity of other companies
[*Redacted – commercially sensitive information concerning APUK structure*]			

+Add additional rows as required

A5 Operational links with other companies or persons

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

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

Alpek UK does [*redacted - commercially sensitive information concerning APUK business operations*] for the direct supply of raw materials or the sale of PET. PTA and MEG supply contracts [*redacted - commercially sensitive information concerning APUK business operations*], while PET sales contracts are generally [*redacted - commercially sensitive information concerning APUK business operations*].

[*Redacted - commercially sensitive information concerning APUK business operations*] Alpek UK has identified the following long-term agreements that support the production or sale of PET.

Company name and address	Nature of agreement	Company registration number and place of registration	Appendix number of contract
[*Redacted - commercially sensitive information concerning APUK business operations*]			

+Add additional rows as required

A6 Accounting practices

1. Please give the financial year convention your company uses for its accounts (e.g. 01 January – 31 December). If any changes have occurred with respect to this

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period or in your accounting practices over the last four financial years, please describe these changes.

APUK's financial year starts on 1 January and ends on 31 Dec. There have been no changes to accounting practices over last four financial years. This can be verified from our audited financials submitted in Companies House.
Appendix reference: NA

2. Please confirm what basis your accounts are prepared under (e.g. local GAAP, IFRS etc). If the accounting policies used by your company have changed over the POI, please explain the changes, including dates and reasons for the changes.

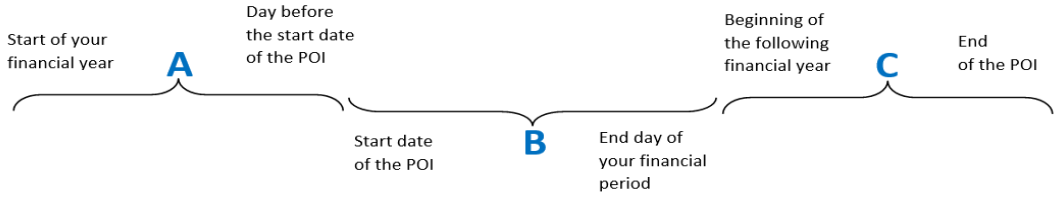
Financials are prepared as per FRS 101 "Reduced Disclosure Framework" as defined under UK GAAP
Appendix reference: NA

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

Attached for 2021-2025
Appendix reference: A6.3.1 to A6.3.5

4. Please attach a copy of your company's trial balance (in original and spreadsheet form) covering the most recent year of the POI (01 January 2025 to 31 December 2025). If your financial year is fully aligned with the POI, this is all that is required.

   Where your financial period is not aligned with the POI, please provide trial balances (in original and spreadsheet form) to cover the following periods:
   A. the trial balance which starts from the beginning of your financial year and ends on 31 December 2024;
   B. the trial balance which starts from 01 January 2025 to the end of your financial year; and
   C. the trial balance which starts from the beginning of your following financial year and ends on 31 December 2025.



Attached
Appendix reference: A6.4

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5. For your company and any associated parties involved in the production, marketing or sales of the like goods, please attach copies of relevant management reports (e.g., profit and loss statement) for the profit centre that includes the goods. Please provide these reports for the (i) most recent year of the POI [01 January 2025 to 31 December 2025] and (ii) most recently completed financial year [if different].

Management accounts attached
Appendix reference: A6.5

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

Management accounts are mapped into following categories: *[Redacted - commercially sensitive information concerning APUK business operations and finances]*
Appendix reference: NA

SECTION B: About your goods

B1 Scope of the investigation

1. Please comment on the scope of the investigation. If you consider that any product categories and/or commodity codes should be added or removed, please explain the reasons why.

APUK supports the scope of the TRA investigation. APUK notes that certain registrants have suggested that the scope of the investigation may be too broad, APUK strongly disagrees on the basis of the following. *A) Regarding the Intrinsic Viscosity (IV) considerations* • PET resin can be produced at a range of viscosities above and below 78ml/g. These all have the same physical appearance as a white / colourless semi-crystalline resin and are all sold through the same route to market. Within bottle grade ranges (generally above 74 ml/g or 76 ml/g), customers easily switch between higher and lower viscosities used for the same application with only

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minor adjustments needing to be made to their converter process. For example, a water bottle customer using IV 84ml/g or IV 80ml/g can readily switch to 74 ml/g or 76 ml/g and manufacture the same bottle. Similarly, a sheet extruder using 74 ml/g or 76ml/g, can easily switch to 80 ml/g or 84 ml/g. In all cases, substantially the same product will be produced.

- As a general rule, PET with a viscosity of 70ml/g or above is used for packaging, with PET below this viscosity being used in the fibre and textile industries. Within packaging grade PET viscosity, higher grades are often viewed as slightly more suitable for carbonated drinks, but customers can still use 74ml/g or 76ml/g for this by including small amounts of additives (a quick and cheap adjustment) and have done so on many occasions in practice, or may merely switch if there is sufficient commercial interest to do so based on the cost of the available materials. PET with viscosity below 78ml/g is therefore interchangeable with, and can directly compete with, PET with viscosity of 78ml/g or above.

- Essentially, packaging grades are generally interchangeable from a customer perspective since technical requirements described above allow substitution. Relative pricing may further influence customers' choice between grades, thus raising considerable circumvention risks if we limit the viscosity range to 78 ml/g or above. This circumvention risk is compounded by the fact that PET with viscosity below 78ml/g is imported under HS code 3907 69 (whereas 78ml/g and above is imported under HS code 3907 61) which means that customers could have an additional commercial incentive to move to lower viscosity PET in order to avoid duties applied to HS code 3907 61.

- This risk is more than merely hypothetical given the interchangeability of the products, as well as that manufacturers of lower viscosity PET located in Europe, Asia and the Middle East (amongst others) have an abundance of capacity. In addition, as of June 2026 the UK introduced a duty suspension for certain goods of HS code 3907 69, this, coupled with any tariffs imposed on products of HS code 3907 61 under safeguarding measures, might encourage customers to switch to lower viscosity PET and then blend or add additives in order to achieve the desired end product and avoid any safeguard duties, thereby undermining the effectiveness of measures.

- From a production side, there are no technical barriers to producing PET with a viscosity below 78ml/g as compared to PET with a viscosity of 78ml/g or above. **[***redacted - commercially sensitive information concerning APUK business operations***]** Manufacturers of PET generally allow a tolerance of approximately ±0.02 intrinsic viscosity, which means that products that are

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sold as intrinsic viscosity 76ml/g may have an actual intrinsic viscosity of between 74ml/g and 78ml/g. Maintaining the scope would therefore better capture the full range of like and competing goods.

B) Recycled content considerations

- Recycled PET does not have a fixed percentage content of vPET and it is also used for food grade applications. It could consist of a range of percentages of vPET all the way down to 0%. Circumvention risk would arise if the scope of the investigation was limited as customers may switch from e.g., 50% rPET to 100% rPET to avoid being within scope of any remedy.

- Moreover, it is possible to blend a combination of vPET and rPET (of any percentage content) for the same applications. From a customer perspective, products which are manufactured using vPET, rPET or a blended combination of vPET and rPET would achieve the same product structure and have similar properties. Further the processing machinery for standard bottle blowing and film extrusion requires minimal adjustment when switching from vPET to rPET (irrespective of the recycled content). As such, vPET and rPET (of any recycled content) are directly competing.

- There is evidence of instances of customers switching to 100% rPET instead of vPET for the same applications in the past few months (please see Appendix B1.1). This clearly demonstrates that customers could switch to rPET where more commercially beneficial (e.g., a better price is available), rather than for any other reasons (e.g., environmental policy or company sustainability goals). As such, it would be false to exclude rPET from the scope of the investigation as it clearly directly competes with vPET.

- From a customer perspective, rPET and vPET have all the same similarities in physical and chemical properties as discussed in the application (there is no particular distinction with 100% rPET as compared to 50% rPET in this regard, apart from colour), and each can be used for the same bottling and sheet extruder applications within the viscosity ranges discussed above.

- APUK understands that some registrants have asserted that rPET and vPET are not competing as rPET is more expensive than vPET. While it is correct that rPET is generally viewed as being more expensive than vPET, this is not in practice the case. As inherent with all products which are linked to commodity pricing (such as vPET), the cost of rPET fluctuates in response to market factors. There have been a number of times in recent months where the price of vPET has exceeded that of rPET (please see **Appendix B1.1**). It

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is therefore incorrect to assert that rPET does not compete with vPET on pricing.

- APUK notes that it was highlighted that rPET flakes do not compete with vPET or rPET in food packaging applications as further processing of the rPET flakes is required in order for the rPET flakes to meet the required standards for food contact. While this is correct, this should not preclude rPET flakes from the scope of the investigation as: (i) such processing is often undertaken and it is relatively easy and inexpensive to conduct, as such if rPET flakes were excluded APUK would have concerns of circumvention; (ii) rPET flakes do directly compete with rPET and vPET in respect of non-food packaging applications, where they can be used without further processing; and (iii) per the relevant registration form, rPET flakes constitute a marginal proportion of imports into the UK and therefore excluding HS 3907 69, a HS code under which vPET and rPET is imported into the UK would have a disproportionate negative impact on the effectiveness of any remedy.

Appendix reference: B1.1

B2 Understanding your goods

The goods concerned in this investigation are defined in '[the scope of this investigation]'.

1. Explain the goods that your company produces which are **like** the goods concerned. In particular, describe:
   - The physical characteristics of the goods you are producing (like goods). e.g. appearance; chemical composition; contents; grade/standards; purity/yield etc; and
   - The commercial characteristics of the goods you are producing (like goods) e.g. end use, distribution channels etc.

Please see Application.

Appendix reference: NA

2. Explain the goods that your company produces which are **directly competitive** with the goods concerned. In particular, describe:
   - The physical characteristics of the directly competitive goods, e.g. appearance; chemical composition; contents; grade/standards; purity/yield etc; and
   - The commercial characteristics of the directly competitive goods, e.g. end use, distribution channels etc.

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PET produced domestically is like to the PET imported into the UK, both vPET and rPET with an intrinsic viscosity above 74 dL/g.
Appendix reference: NA

3. Please complete **Annex 2 – Goods**, indicating the like or directly competitive goods you produced during the POI by commodity code. Provide details for each product category specifying any differences between them.

   Where available, please provide technical documentation (such as sales catalogues, safety standards, technical data, etc.) for each product category.

B3 Understanding the UK market

1. Have there been any changes to the pricing of the like or directly competitive goods in the UK market in the last five years, caused by factors other than raw material costs?

Please see Application.
Appendix reference: NA

2. Have there been any changes to the patterns of consumption of the like or directly competitive goods in the UK market in the last five years? Include volumes where possible.

Please see Application.
Appendix reference: NA

3. Please describe the current state, and future projections, of the UK or world markets for the like or directly competitive goods. Please provide any evidence to underpin your response.

Please see Application.
Appendix reference: NA

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SECTION C: Costs and production

C1 Cost to make and sell

1. Please complete **Annex 3 – Cost to make and sell** for the most recent year of the POI [01 January 2025 to 31 December 2025] for your like goods sold on the domestic market**.** All figures should be reported net of recoverable tax. Please see additional notes in the annex for assistance on how to complete it.

   Please provide costs to make and sell for (i) the whole company, and (ii) the like goods that you produce by commodity code.

2. Describe the individual components of the costs included in **Annex 3 – Cost to make and sell** and provide detail on how these costs are paid.

The following are the components included in the cost:

1. *Raw Materials*
   a. *Purified Terephthalic Acid (PTA)*
   b. *Mono ethylene Glycol (MEG)*
   c. *Pure Isophthalic Acid (IPA)*
   d. *Antimony Catalyst*
   e. *Phosphoric Acid*
   f. *TiN 10% Solution*
2. *Utilities*
3. *Direct Labor costs*
4. *Other direct costs – like jetty expenses, inbound handling*
5. *Manufacturing overheads*
   a. *Maintenance*
   b. *Depreciation*
   c. *Fixed fees (infrastructure, business rates)*
   d. *Other overheads*
6. *Commission*
7. *Freight – outbound (shipment to customers)*
8. *Stock handling costs (warehousing etc)*
9. *SG&A*

[Redacted - commercially sensitive information concerning APUK business operations and financials]

Appendix reference: NA

3. Please complete **Annex 4 – AS&G** for the most recent year of the POI [01 January 2025 to 31 December 2025] for your like goods sold on the domestic market**.** All figures should be reported net of recoverable tax. Please see additional notes in the annex for assistance on how to complete it.

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Please provide AS&G costs for (i) the whole company, and (ii) the like and directly competitive goods that you produce by commodity code.

4. If your company is vertically integrated, please provide details of how the product cost is transferred from one production process to another (e.g., at cost, internal transfer).

The company is not vertically integrated.
Appendix reference: NA

5. If some of the inputs (e.g., raw materials, energy) used in the production of your like goods are produced by an associated party, provide details of this arrangement, and attach documentation demonstrating any agreements you have.

None
Appendix reference: NA

6. If your company incurred any extraordinary costs (such as start-up or ramp up costs) during the POI, please provide details of these costs, explaining why they were extraordinary and how they have been included and amortised/depreciated in your accounts.

None
Appendix reference: NA

7. Please explain how you finance your production of like goods, your sources of finance, whether there is any cost of finance associated with the production of like goods, and how you have reported this in the cost to make figures and company accounts.

[Redacted - commercially sensitive information concerning APUK business operations and financials]
Appendix reference: NA

8. Please state the cost allocation method used for each cost type listed in **Annex 3 – Cost to make and sell**, including an explanation of the allocation under each subheading and to commodity codes.

[Redacted - commercially sensitive information concerning APUK business operations and financials]
Appendix reference: NA

C2 Cost and sales reconciliation

1. Please complete the Cost reconciliation table in **Annex 5 – Cost reconciliation** starting from the bottom of the table and filling in only the white cells.

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This section will help us reconcile the cost data provided in section **Annex 3 – Cost to make and sell** and **Annex 4 – AS&G**. Please see additional notes in the annex for assistance on how to complete it.

C3 Production process

1. Please provide a written summary and a diagram/flow chart, if available, of your production process clearly indicating the different production stages for your like goods and directly competitive goods carried out by your company.

[Redacted - commercially sensitive information concerning APUK business operations] *Please see Application, however a summarised version specific to APUK has been included below in case helpful.* *[Redacted - commercially sensitive information concerning APUK business operations]*
Appendix reference: NA

2. Identify what parts of your production process take place in the UK and explain at what stage the most value is added to your like goods in the production process. If a production process is carried out outside the UK, please explain the nature of the activity and where this process step takes place.

The entire PET production process is carried out in UK. The greatest value added is generated during the [redacted – commercially sensitive information] stage of the process.
Appendix reference: NA

3. Please provide the physical addresses (including town/city and county) of all your company's UK sites/facilities involved in the production of the like and directly competitive goods.

Company name	Physical address
Alpek Polyester UK Limited	*Davies Offices, Wilton International, Redcar, Cleveland, TS10 4XZ*
	Appendix reference: NA

+Add additional rows as required

C4 Joint products and by-products

1. Please explain any waste, scrap or by-products related to the production of the like and directly competitive goods. Please explain:

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- how you differentiate your waste, scrap and by products;
- what you do with your waste, scrap and by-products;
- how any income or cost from waste, scrap or by-products is recorded; and
- the average waste, scrap, and by-product ratio resulting from the production process of the goods.

The principal waste, scrap and by-product streams arising directly from APUK's PET manufacturing process are summarised on the next page. APUK differentiates these streams according to their origin, specification and potential for recovery or reuse.

Stream	Classification / how differentiated	Treatment / destination	Income or cost treatment	Average ratio
[*Redacted – commercially sensitive information concerning APUK business operations*]				
[*Redacted – commercially sensitive information concerning APUK business operations*]				
[*Redacted – commercially sensitive information concerning APUK business operations*]				

Appendix reference: NA

2. Please identify any products which share a joint process with the like and directly competitive goods which you produce. Please indicate at which point in the manufacturing process the products diverge.

No products other than the like product are produced.

APUK's Wilton PET production facility has produced PET resin exclusively since its commissioning in 2014. During the Period of Investigation (1 January 2021 to 31 December 2025), all Grade 1 commercial PET resin products manufactured by APUK fell within the definition of the like goods.

APUK produces several PET resin grades with different product specifications. These grades are manufactured on the same single production line on a campaign basis and do not physically diverge at any point in the manufacturing process. Differences between grades are achieved through relatively minor changes to formulation/additive addition and operating conditions according to the required product specification.

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Consequently, there is no point in the manufacturing process at which a separate joint product diverges from the production of the like goods.
Appendix reference: NA

3. Please explain how your costs of production (per unit) differ between the like and directly competitive goods and its joint products, if applicable. Comment on the reason for this difference and explain your method(s) of calculation.

The like product is the only product manufactured by the company.
Appendix reference: NA

C5 Raw material (RM) and major input purchases

1. Please complete **Annex 6 – Raw materials and inputs**, detailing by transaction, purchases for cost types used in the production of the like goods which account for more than 5% of total cost to make and sell (or if energy more than 1%), during the POI by your company. Please see additional notes in the annex for assistance on how to complete it.
2. Please provide an invoice and any supporting documents for two of your purchases stated within **Annex 6 – Raw materials and inputs**. Use the box below to give an overview of any supporting documents provided.

[Redacted – commercially sensitive information concerning APUK business operations] – Purchase of MEG – invoice and Bill of Lading attached *[Redacted – commercially sensitive information concerning APUK business operations] – Purchase of PTA – invoice, Bill of Lading, Certificate of analysis are attached.*
Appendix reference: C5.2.a, C5.2.b

SECTION D: Sales

D1 Domestic sales

1. Please complete the Transaction-by-Transaction Domestic Sales tab in **Annex 7**.

D2 Sales reconciliation

1. Please complete the Sales reconciliation table in **Annex 8 – Sales reconciliation** starting from the bottom of the table.
2. Additionally, please provide quantitative estimates (e.g., projections or forecasts) for the sales revenue and quantity of like and directly competitive goods as well as all other goods you produce on the UK market for the next five years.

The forecasts have been prepared under two scenarios to illustrate the expected development of UK domestic sales with and without a safeguard measure.

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[Redacted – commercially sensitive information concerning APUK business operations]

Like product forecast without safeguard (Index points)						
	Unit	2026	2027	2028	2029	2030
Domestic Sales	Ton	100	96	92	88	85
Domestic Sales	GBP	100	88	86	83	79

Like product forecast with safeguard (Index points)						
	Unit	2026	2027	2028	2029	2030
Domestic Sales	Ton	100	112	124	139	155
Domestic Sales	GBP	100	103	116	129	144

Appendix reference: NA

D3 Distribution channels and price setting

1. If applicable, please provide copies of price lists for the like goods for most recent year of the POI, 01 January 2025 to 31 December 2025.

[Redacted – commercially sensitive information concerning APUK business operations]

Appendix reference: NA

2. If any price reductions have been applied to any of your sales of like and directly competitive goods over the POI, please provide a description. This includes discounts, rebates, credit terms, allowances and commissions.
   - Explain the terms and conditions that must be met for any price reduction.
   - Indicate any price reduction not included in an invoice price. Explain how the invoice price and the price reduction have been calculated.
   - If you have issued any credit notes that are not reflected in invoice prices, provide details of the criteria for issuing such notes and the impact that they have on prices (both past and future).

[Redacted – commercially sensitive information concerning APUK business operations]

Appendix reference: NA

3. Do your sales usually include delivery in the price, and does delivery price vary between customers? If so, please explain how you calculate delivery costs and prices.

[*Redacted – commercially sensitive information concerning APUK business operations*]
Appendix reference: NA

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SECTION E: Increase in Imports

1. Please comment on import trends of the goods concerned during the POI.

Please see Application.
Appendix reference: NA

2. Please comment and provide evidence on the circumstances that led to, or were likely to have led to, the increase in imports of the goods concerned to the UK in the POI (e.g. Changes in patterns of demand for the goods concerned, like goods and directly competitive goods; Global overcapacity or increases in production capacity of the goods concerned; and economic or political crises).

Please see Application.
Appendix reference: NA

3. Please comment and provide evidence on the foreseeability of these circumstances that led to, or were likely to have led to, the increase in imports of the goods concerned to the UK in the POI.

Please see Application.
Appendix reference: NA

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SECTION F: Serious Injury

1. Please estimate the date when the increased quantity of imports began to cause serious injury to your company.

Please see Application. APUK has suffered injury as a result of surging imports from, at least, the start of the POI (1 January 2021). This can be seen in the trends demonstrated in Annex 9 – Injury, which demonstrate a clear year-on-year decline in APUK's turnover, domestic sales volume and price, profitability, output by volume and value and productivity. See below for further comments on these aspects.

Due to the impact of covid-19 on the PET market during 2020, whereby demand increased as a result of increased consumer demand for packaged food products, import volumes of PET into the UK during 2020 are distorted. Having reviewed available import data, APUK considers 2018 to be an accurate reflection of the UK market prior to distortion arising from surge imports and downward pricing pressure. The imports started surging from 2018 and APUK competed in the domestic market with 200KT at reduced prices. All subsequent years, import competition was severe and eroded margins and market share. The operating rates started falling continuously ever since losing the volumes to imports.

Appendix reference: NA

2. Please comment on and provide evidence where possible on the export capacity of the goods concerned in foreign countries or territories, and the likelihood that capacity will be exported to the UK.

Please see the Application for further details regarding overseas production and export capacity. With respect to the likelihood that such capacity will be exported to the UK, the evidence indicates that the UK is already a significant destination for overseas PET production and faces a substantial risk of further trade diversion.

First, HMRC trade data demonstrates that overseas capacity is already being directed to the UK in significant and increasing volumes. Across the POI, imports increased their share of the UK market from 58.8% in 2022 to 77.4% in 2025, with a corresponding year-on-year erosion of APUK's market share. This demonstrates both the ability and willingness of overseas producers to supply the UK market and the capacity of imports to rapidly gain additional market share.

Second, the risk of further increases is heightened by the progressive tightening of access to other major PET markets. A number of jurisdictions have introduced tariffs, trade remedies or safeguard measures that make those markets less accessible to overseas PET capacity. One of the most recent includes Türkiye, which introduced a safeguard measure on PET resin in July 2026. Mexico recently changed to an MFN

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tariff of 35% to PET imports. Brazil applies a 20% import tariff and has adopted anti-dumping measures against certain PET imports. The United States maintains a combination of ordinary customs duties, additional tariffs and anti-dumping and countervailing duties, resulting in effective protection that can substantially exceed 100% for certain origins. Canada also maintains trade remedies against PET resin from China and Pakistan.

Country	Sanctioned country	Range	Type of measure	Entrance into force	Source
Brazil	Malaysia	34.28 - 116.5 USD/ton	Antidumping	02-sep-26	RESOLUÇÃO GECEX Nº 958, DE 2 DE SETEMBRO DE 2026 - Aplica direito antidumping definitivo, por um prazo de até cinco anos, às importações brasileiras de resina PET, originárias da Malásia e do Vietnã.
	Vietnam	160.87 USD/ton			
Canada	China	158%	Antidumping/ countervailing	15-oct-25	Notice of final decisions: Polyethylene Terephthalate Resin 2 (PETR2 2025 IN)
	Pakistan	18 - 100.6%	Antidumping		
Mexico	China	0.04 - 0.24 USD/ton	Antidumping	29-may-25	DOF - Diario Oficial de la Federación - 29-05-2025
	Non-FTA countries	35%	MFN modification	23-abr-26	DOF - Diario Oficial de la Federación- 23-04-2026
Türkiye	All Countries	120 USD/ton	Safeguard	19-jul-26	The following communication, dated and received on 17 July 2026, is being circulated at the request of the delegation of Türkiye
United States	Diverse countries	10 - 12.5%	Safeguard / executive measure	24-jul-26	Federal Register :: Actions by the United States in the Investigations Under Section 301 of the Trade Act of 1974 of the Acts, Policies, and Practices of 60 Economies Related to the Failure of Each Economy To Impose and Effectively Enforce a Prohibition on the Importation of Goods Produced With Forced Labor

These measures are particularly relevant because PET is a globally traded commodity and major overseas producers have substantial export capacity and the ability to redirect volumes between destination markets. As defence to domestic industries increase in other major markets, the relative openness of the UK market becomes increasingly important in exporters' decisions as to where excess production can be placed. The relevant risk is therefore not limited to further growth from suppliers already increasing exports to the UK but also includes the diversion of volumes that become less commercially attractive to place in other markets.

The effectiveness of any UK safeguard should therefore be considered in this broader international context. A remedy that remains materially below the barriers applicable in other major destination markets may not sufficiently alter the relative attractiveness of the UK market. In those circumstances, overseas producers could continue to have

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a strong commercial incentive to direct incremental or displaced volumes to the UK, notwithstanding the safeguard.
Appendix reference: NA

3. Please comment on and provide evidence where possible on the share of the UK domestic market taken by the importation of the goods concerned in increased quantities during the POI.

Please see Application.
Appendix reference: NA

4. Please complete **Annex 9 – Injury**. This should be completed in reference to your UK production of the like goods and directly competitive goods for the POI.

5. Please comment on changes in your level of sales, with reference to the data provided in **Annex 9 – Injury**.

Please see Application. APUK domestic sales have declined year-on-year during the POI, in terms of indexed volume, from 100 points in 2021 to 66 points in 2025, representing a 34 index points decrease in sales volume across the POI.
Appendix reference: NA

6. Please comment on changes in your level of profitability, with reference to the data provided in **Annex 9 – Injury**.

Please see Application. *APUK profitability has declined across the POI [Redacted – commercially sensitive information concerning APUK business operations and financials], representing a 228 index points decrease. This decline in profit is as a result of the surge in imports into the UK causing APUK's declining sales and market share. For completeness, the revenue performance during 2022 was as a result of higher prices being achieved during this period as a result of the sharp increase in oil and energy prices following Russia's invasion of Ukraine. This anomalous market situation should not obfuscate that APUK was still clearly suffering injury during 2022 as notwithstanding the revenue performance for 2022, APUK's volume sales was still declining.* *[Redacted – commercially sensitive information concerning APUK business operations and financials] APUK does not consider it possible to reduce costs any further. Given APUK's reduced cost structure, one would expect APUK's profitability to have increased, however [Redacted – commercially sensitive information concerning APUK business operations and financials] those costs were spread over fewer units of production [Redacted – commercially sensitive information concerning APUK business operations and financials]*

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Appendix reference: NA

7. Please comment on changes in your level of production, with reference to the data provided in **Annex 9 – Injury**.

Please see Application. By way of summary, APUK's production performance [redacted – commercially sensitive information concerning APUK business operations and financials] representing a cumulative decline of 41 index points, with production decreasing in every year of the POI. This contraction occurred despite increasing UK demand, indicating that APUK was not reducing production in response to a shrinking market but was instead being displaced by imported PET.
Appendix reference: NA

8. Please comment on changes in your level of productivity, with reference to the data provided in **Annex 9 – Injury**.

Please see Application. By way of summary, [redacted – commercially sensitive information concerning APUK business operations and financials], Although employment levels remained relatively stable, the indexed average output per employee declined form 100 points in 2021 to 62 points in 2025, a cumulative decrease of 38 index points , with productivity falling in every year of the period.
Appendix reference: NA

9. Please comment on changes in your level of employment, with reference to the data provided in **Annex 9 – Injury**.

Please see Application. Employee levels have remained relative stable across the POI, with the average wage per FTE's engaged in activities related to PET increasing year-on-year. [Redacted – commercially sensitive information concerning APUK business operations and financials]
Appendix reference: NA

10. Please comment on changes in your level of capacity utilisation, with reference to the data provided in **Annex 9 – Injury**.

Please see Application. APUK suffered a sharp deterioration in capacity utilisation during the POI, declining from an indexed volume of 100 points in 2021 to just 59 index points in 2025, while installed capacity remained unchanged. [Redacted – commercially sensitive information concerning APUK business operations and financials]
Appendix reference: NA

11. Please comment on changes in your level to cost to make and sell the like goods, with reference to the data provided in **Annex 9 – Injury**.

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Please see Application, as well as response 6 above.
Appendix reference: NA

12. Please comment on and provide evidence of what would be a normal rate of profit, in the absence of increased quantities of imports of the goods concerned.

Please see Application and proposed Adjustment Plan. *[Redacted – commercially sensitive information concerning APUK business operations and financials]*
Appendix reference: NA

13. Please comment on the link between the serious injury, or threat of serious injury, suffered by the UK industry and the increase in imports into the UK. The injury factors specified above can be used to explain the casual link. Please consider the following:
    - Has the increase in imports caused serious injury to the industry or a threat of serious injury?
    - Why has the industry not been able to adjust to the increase in imports?
    - Have the imports of the goods into the UK been sold at prices lower than the like or directly competitive goods?
    - Has price undercutting of the imported goods caused you to lower the prices of the like or directly competitive goods produced by your company?

Please see Application.
Appendix reference: NA

14. Please provide any additional evidence that the TRA should consider in the assessment of serious injury.

Please see Application. *[Redacted – commercially sensitive information concerning APUK business operations and financials]*
Appendix reference: Appendix F14

15. Please comment on other factors, separate from the increase in imports, that may have caused serious injury or threaten to cause serious injury to the UK industry. This may include:
    - UK demand for the like or directly competitive goods;
    - The overall situation on the global market of the like or directly competitive goods, and the demand for exports towards third countries;

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- The competitiveness of your company (including quality, efficiency and performance of your production lines) with respect to your competitors; and
- The reasons and consequences of any reductions in your exports to other markets.

Please see Application. Concerning exports from APUK, as explained in the Application, APUK's plant is primarily focused on Domestic UK market. *[Redacted – commercially sensitive information concerning APUK business operations and financials]*
Appendix reference: NA

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SECTION G: Adjustment Plan

Should the TRA be satisfied that UK producers in the like goods and directly competitive goods are suffering or have suffered serious injury (or threat thereof) caused by the importation of the goods concerned in increased quantities, we may recommend the implementation of a safeguard measure. However, to make a recommendation, we must be satisfied that UK producers will put in place an adjustment plan setting out how they intend to adjust to the importation of the goods in increased quantities.

1. Please explain your companies adjustment strategy in response to the increase in imports. In your answer, please refer to:
   - What do you intend to do to adjust to the importation of the goods concerned in increased quantities;
   - Why you have chosen the specific factors cited as part of your adjustment plan (e.g. Potential innovation, research and development initiatives to improve the competitiveness of UK producers; and changes which UK producers intend to make to improve efficiency, including workforce effectiveness and investing in new or different machinery);
   - The outcome that you wish to achieve with these adjustments; and
   - When are you expecting to implement these actions and achieve desired outcomes.

   The expected outcomes presented in the adjustment plan should cover, but are not limited to:
   - Changes to selling prices and / or volumes; and
   - Changes to costs, such as direct material costs, labour costs and manufacturing overheads (indirect expenses)

Please see an updated Adjustment Plan. **[***Redacted – commercially sensitive information concerning APUK business operations and strategy***]**
Appendix reference: Appendix G1

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SECTION H: Economic Interest Test

This section collects information to understand the competitive landscape and how the market works for PET. It is also used to assess the economic impact of a safeguard measure compared to what would happen if a measure were not applied.

H1 Understanding the market

1. Describe the end-use(s) of PET. If there are multiple uses, list them, and estimate what proportion of sales goes toward each use type e.g. food packaging, beverage packaging, pharmaceutical packing, other packaging, etc.

Please see Application. [Redacted – commercially sensitive information concerning APUK business operations and financials]
Appendix reference: NA

2. Based on your knowledge, approximately, how many:
   - UK based companies produce PET?
   - Foreign companies sell PET in the UK?

   Are these producers typically small, medium-sized enterprises (SMEs), larger corporations or a mix of both?

APUK is the sole producer of vPET. APUK does not have visibility of rPET producers in the UK. Public sources indicate that current UK capacity for rPET pelletisation is approximately 85,000 MT per year[1]. *APUK has researched and compiled following list of rPET manufactures in UK:* • *Clean Tech UK / Plastipak* • *Esterpet / Biffa* • *Jayplas* *2 new plants are announced to come online* • *Veolia Battenfield* • *Enviroo Chesire.*
Appendix reference: NA

3. Based on your knowledge, approximately how much PET is sold in the UK each year in tonnes?

In 2025 approximately 423.9 kilo tonnes of PET is sold in the UK.
Appendix reference: NA

[1] UK needs £750m in new PET recycling capacity ahead of deposit return scheme | Resource Media

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4. How similar are PET (e.g. vPET, rPET or other PET) produced by different producers? Explain any significant differences (e.g. price, regulation, packaging, quality, or other features).

PET produced by different producers is substantially the same in all material aspects.

Quality of PET produced by different PET manufacturers worldwide are very similar and they all adhere to common standards and certifications such as FDA, Reach, etc. rPET products coming from different manufacturers might have variations in colour due to the quality of feedstocks used but such colour variations in rPET are generally accepted by brands and convertors.

Appendix reference: NA

5. How easy is it for businesses to start production of PET? Consider any barriers to starting production, for example:
   - irrecoverable past investments;
   - technology, regulatory barriers;
   - inability to reach the minimum production scale to operate feasibly;
   - high upfront or long duration investment before starting production;
   - skills shortages;
   - prohibitive start costs associated with continuous production etc.

In comparison with other manufacturing industries, stablishing PET production capacity is neither straightforward nor prohibitively difficult. Compared with industries such as aluminium and glass manufacturing, PET production shares similar characteristics, including significant capital requirements and the importance of economies of scale.

New businesses can establish PET production facilities, but this requires substantial capital investment particularly in relation to plant construction, start-up activities and plant maintenance costs. PET production also requires specialised equipment, highly skilled technical personnel, and strict quality control systems. Nevertheless, these requirements are not insurmountable, and new capacity can be developed where market conditions provide adequate incentives.

The same is true in terms of capacity utilisation, as PET production technologies generally need to operate at relatively high utilisation rates to achieve both technical and economic efficiency. Although several production technologies are readily available, raw materials and energy consumption factors are directly correlated with plant utilization rates which typically need to be above 80%-85% for operations to be stable and commercially viable.

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Although achievable, the lead time required to develop and commercialise new PET production capacity is typically measured in years rather than months, reflecting the investment, construction, testing, and customer approval processes involved.

The operation of a PET resin plant requires technical knowledge and appropriately trained personnel, particularly because PET production is a continuous manufacturing process. However, under favourable economic conditions, these capabilities are generally available within the petrochemical and plastics industries and can be developed through training and operational experience. Similarly, the commissioning and ramp-up of a PET production facility may involve a temporary period of process stabilisation, during which some off-specification material may be produced. This is a common characteristic of continuous-process manufacturing operations and is generally anticipated as part of normal start-up activities.

There are no major regulatory barriers to start the production of PET, but Government restrictions apply to manufacturing processes and environment requirements. A relevant consideration is that businesses intending to produce in the United Kingdom face more stringent climate-related obligations under the Net Zero policy, which translate into higher compliance and energy costs. These requirements contribute to comparatively higher production costs in the UK, particularly when compared to products manufactured outside the EU and the UK, using raw materials and processes that are not subject to equivalent Net Zero constraints.

Appendix reference: NA

6. How easy is it for businesses to stop production of PET? Consider any barriers to stopping production, for example:
   - labour related costs;
   - regulatory exit requirements;
   - irrecoverable past investments;
   - long-term contracts with buyers or suppliers and any penalty termination costs;
   - government interventions (e.g. subsidies);
   - bankruptcy regimes etc.

The decision to stop a PET production is mainly driven by commercial considerations and is neither instantaneous nor unusually difficult compared with other capital-intensive manufacturing activities.

The closure of a PET production facility may involve costs associated with employee arrangements, maintenance of idle assets, contractual obligations, environmental compliance, and potential restart requirements. In addition, PET production facilities are typically supported by significant historical investments, a substantial portion of which may be difficult or impossible to recover if operations cease permanently.

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If the trend in import volumes continues to affect capacity utilization at the observed rate during the period, there exists a significant risk that the UK domestic industry will suffer a permanent loss of PET production capacity, the recovery of which would be extremely difficult, if not unfeasible to restore.

Furthermore, as is the case with APUK'S facility, PET plants are often integrated within broader industrial and chemical manufacturing clusters. As a result, a shutdown of PET production's facility may have implications for neighbouring businesses that provide utilities, logistics, maintenance services, feedstocks, or other operational support.

Appendix reference: NA

7. If the price of all of PET in the UK were to increase, would consumers significantly reduce their demand? And why?

No – PET is an essential product necessary for the manufacture of multiple plastic end goods, including in particular food and beverage packaging. As PET pricing is linked to the price of crude, customers (i.e., bottlers, converters etc.) are used to price fluctuations in PET, including price increases. The input cost of PET constitutes around 0.8% of the total cost of the CSD bottle retail price and 2.4% in the water bottle retail price in the UK and therefore is unlikely to drive changings in pricing, particularly when cost increases would merely be market restoring (i.e., returning levels to pre-surge and negating the impact of price undercutting). While the cost of carbonated soft drinks to consumers has increased, such price inflation is more appropriately attributed to the implementation of taxes (e.g. the sugar tax) and the increased cost of more significant raw materials (e.g., sugar).

Appendix reference: NA

8. Do downstream businesses buy PET from the cheapest producer, or are there other factors that influence their decision such as quality, service or environmental regulations?

While there may be other factors influencing purchasing decisions, based on its experience, APUK considers that pricing is the single more significant factor. This is supported by evidence of customer switching – including between rPET and vPET – based on pricing, as set out response to Question B1.1. above.

Appendix reference: NA

9. How easy is it for producers to increase or decrease production in response to changing market conditions such as increased demand?

Apart from planning purchase of additional raw materials, the plant can be scaled up quickly to meet with increased demand. Similarly decreasing production can also be done quickly with sufficient planning on the supply chain.

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Appendix reference: NA

10. Describe any major changes in demand or preferences for PET and their causes over the POI. For example:
    - Prices of goods;
    - Price of substitutes and complementary goods;
    - Consumer preferences and tastes;
    - Technological developments;
    - Environmental regulations;
    - Taxes and subsidies etc.

During the POI PET demand remained robust. There were no significant changes which materially impacted preference as between rPET and vPET and purchasing decisions were still predominantly driven by price. While prices did fluctuate, including peak increases during 2022 as a result of Russia's invasion of Ukraine, such changes are intrinsically linked to PET pricing being linked to the feedstock commodity value chain. As such, price fluctuation is expected in the market and may lead to switching between rPET and vPET on a spot basis, as is the nature of the PET market. *The UK did introduce the Plastic Packaging Tax (PPT) to incentivise manufacturers to increase recycled content in plastic packaging and the Extender Producer Responsibility (ERP) to transfer a greater portion of packaging waste management costs to producers during the POI. However, the introduction of such measures have not led to wholesale changes in demand in the market, rather pricing is still the largest influential factor, as demonstrated by switching between vPET and rPET. Finally, there has been no significant changes to end consumer demand which has resulted in a preference for rPET over vPET (or vice versa): end consumers are generally agnostic to PET choice in packaging.*
Appendix reference: NA

11. Do you foresee any major changes in demand or preferences for PET in the next four years?

Over the next four years, UK PET demand is expected to remain broadly resilient.
Appendix reference: NA

12. What are the major distribution and marketing channels within the UK market for PET?

The UK PET market presents significant marketing and commercial challenges because PET resin is primarily a B2B industrial product rather than a consumer-facing product. Demand is concentrated among a relatively limited number of large beverage producers, food manufacturers, packaging converters and retailers,

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meaning that market access depends heavily on establishing long-term commercial relationships, technical approvals and reliable supply agreements.

At the same time, customers increasingly expect competitive pricing, consistent quality, recycled-content credentials, traceability and regulatory compliance. In particular, rPET must compete against volatile virgin-PET prices, while customers may require product qualification and certification before switching suppliers.

The distribution structure adds further complexity. Suppliers must often work through a combination of direct contracts, converters, distributors, importers and strategic recycling partnerships, while the development of the UK Deposit Return Scheme is likely to further reshape supply chains.

Appendix reference: NA

13. Who (type of business/consumer) buys PET within the UK market and for what purpose?

The largest and most strategically important source of PET demand in the UK is the beverage sector, particularly bottled water and soft drinks. Food packaging represents another major application, while personal care, household products, pharmaceuticals and textiles account for smaller but significant markets.

Appendix reference: NA

14. Does PET from certain countries compete directly with the goods you produce, or are there any factors which may mean UK consumers do not opt for the cheapest priced PET?

All PET competes directly with the goods APUK produces. As PET is a commodity product, there are no country-specific factors that would cause UK customers to pay a premium for PET from a particular origin. In APUK's experience, customers generally seek to source PET at the lowest available price, provided that the product meets the required specifications and supply requirements. Purchasing decisions may also be influenced by broader considerations, such as recycled content objectives. However, in APUK's experience, recycled content targets do not prevent customers from purchasing vPET.

Appendix reference: NA

15. Are there any government regulations (e.g. environmental) or tax incentives which significantly affect the production or sales of PET. If yes, give details?

UK regulation has a significant effect on the economics of PET, particularly on packaging demand, recycled content, and investment in recycling. The most important measures are the Plastic Packaging Tax (PPT), Extended Producer Responsibility (EPR), and the Deposit Return Scheme (DRS).

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The Plastic Packaging Tax applies to finished plastic packaging manufactured in or imported into the UK that contains less than 30% recycled plastic. The current rate, from 1 April 2026, is £228.82 per tonne.

The UK's Extended Producer Responsibility for Packaging regime makes producers/importers responsible for a greater share of the costs associated with managing packaging once it becomes waste. From October 2025, obligated producers began paying packaging waste disposal costs. Large organisations also have recycling obligations and must acquire PRNs/PERNs as evidence that their obligations have been met. The EPR system therefore adds another cost to putting plastic packaging on the UK market.

Appendix reference: NA

16. Describe any developments in technology affecting the production process(es) of PET.

PET polymerisation is a mature industrial technology, and the underlying chemistry has changed little in recent decades. Virgin PET continues to be produced predominantly by direct esterification of PTA with MEG followed by melt polycondensation, with technological development focused mainly on larger plant scale, improved energy efficiency, heat integration, process simplification and incremental reliability improvements. Both conventional CP/SSP and Melt-to-Resin or equivalent technologies remain established commercial routes.

Catalyst chemistry and virgin PET product grades have also remained relatively stable, with antimony-based catalysts still widely used and bottle-grade PET increasingly standardised around a relatively small number of common grades.

The most significant current technological development is in circularity, particularly the integration of recycled PET into polymerisation processes and, to a lesser extent, chemical recycling routes such as glycolysis, hydrolysis and methanolysis. These developments are progressing but have not yet fundamentally altered the PET production process or competitive structure of the market.

Appendix reference: NA

17. Describe any other factors which influence the market for PET which you have not already mentioned (e.g. seasonality).

The PET market is cyclical and subject to seasonal fluctuations. Typically, demand for PET increases in summer and warmer months, with decreased demand experienced across the cooler months.

It is important to note that this seasonality in demand is not linked to the prices paid by consumers for packaged or bottled products. The influence of PET on UK retail

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prices is limited, as it accounts for only [redacted: Information concern Domestic Industry's costs –Commercially sensitive information] bottle. There has been a negligible increase in demand for rPET as a result of increasing focus on ESG initiatives and reduced carbon footprint.
Appendix reference: NA

H2 Changes affecting your business / the market

1. Complete **Annex 10 – Employment by site** tab, providing employment figures in full-time equivalents (FTE) for each of your company's UK sites or facilities. Explain how your total employees involved in the UK manufacture of like goods are split across different sites/locations.

All our total employees involved in the manufacture of PET work at a single production site located in Wilton International Site.
Appendix reference: NA

2. How important is the production of PET to your company e.g. proportion of total sales/revenues?

APUK produces only PET, and all of its sales are derived from this product. Accordingly, PET production is vital to the company's survival.
Appendix reference: NA

3. How would you expect restrictions on imported PET to affect:
   - Domestic prices of PET;
   - UK production of PET.

Domestic prices *The safeguard measure will contribute to the establishment of economically sustainable domestic prices by mitigating the injurious effects of import surges that are influenced by structural distortions in international markets. In particular, the imported products may benefit from artificially low input costs, government support measures, and excess production capacity in exporting countries, enabling them to enter the market at prices that do not reflect normal market conditions.* *By providing temporary relief from these distortions, the safeguard measure will allow prices to better reflect actual production costs and market fundamentals, thereby supporting fair competition and the long-term viability of the domestic industry.* *UK production of PET* *By alleviating the pressure caused by excessive low-priced imports, the safeguard measure will create conditions that enable domestic producers to increase capacity*

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utilisation, improve production levels, and make investments necessary to meet market demand.
Appendix reference: NA

4. How would your company be affected if safeguard measures are **NOT** imposed including:
   - by site (this is only relevant if you company operates across more than one site).
   - on domestic sales of PET
   - on your plans for investment/expansion.

If safeguard measures are not imposed, the injury to PET's domestic production will not be limited to sales volumes or production levels. The significant surge in imports has already resulted in the reduction of production lines and workforce layoffs. *The continued influx of imports at volumes and prices that do not reflect normal market conditions threatens the viability of domestic PET manufacturing in the United Kingdom. Without effective safeguard measures, both in terms of their scope and level, domestic producers may be unable to maintain operations, undertake necessary investments, or preserve employment. In such circumstances, the UK PET industry could face a progressive contraction and, ultimately, the risk of exiting the market altogether.*
Appendix reference: NA

5. Would there be any indirect effects (e.g. price increases, consumers switching to substitute products, input costs, reduced innovation,) on your industry and/or business if trade remedies are imposed on PET. Comment on the effect if **NO** measure is imposed.

The disappearance or substantial weakening of domestic PET production would not only harm producers and their employees but would also have broader consequences for the UK economy. In particular, the UK food and beverage sector, which relies heavily on PET as a key input, would become increasingly dependent on foreign suppliers, as the possibility of switching to substitute products is extremely limited in practice. Such dependence would expose downstream industries to external supply disruptions, international price volatility, logistical constraints, and geopolitical risks beyond their control. *Furthermore, as is the case with APUK'S facility, PET plants are often integrated within broader industrial and chemical manufacturing clusters. As a result, a shutdown of PET production's facility may have implications for neighbouring businesses that provide utilities, logistics, maintenance services, feedstocks, or other operational support.*

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The failure to implement effective safeguard measures would deprive the PET industry of the revenues and profitability necessary to support long-term investment, thereby undermining its ability to innovate, develop more sustainable production processes, and achieve the environmental objectives that are a strategic priority for both the industry and the UK economy. The transition towards more sustainable PET production, including increased recycled content, enhanced recyclability, reduced carbon emissions, and investment in circular-economy technologies, requires substantial capital expenditure and continuous research and development. A financially weakened industry cannot realistically be expected to undertake such investments.
Appendix reference: NA

6. Do you know of any related industries that would be affected if a safeguard measure was imposed on the goods concerned?

No adverse effects on related industries are anticipated as a result of the imposition of safeguard measures on the PET subject to this investigation. Downstream users will continue to have access to PET from both domestic and foreign sources, while benefiting from a more stable and resilient supply chain. *[Redacted – commercially sensitive information concerning APUK business operations and intelligence gained from commercial dealings.]* *The safeguard measures would contribute to preserving domestic production capacity and ensuring the continued availability of PET in the UK market. As a result, consumers and downstream industries would benefit from greater certainty of supply and reduced exposure to transportation disruptions, logistical bottlenecks, and other risks associated with excessive reliance on imported products.* *Accordingly, the measures would strengthen supply chain resilience and support the long-term interests of UK industries that depend on PET as a critical input, without restricting access to economically sustainable sources of supply.*
Appendix reference: NA

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

No impact. [Redacted – commercially sensitive information concerning APUK business operations]
Appendix reference: [NA]

8. Are there any other factors that you think we should be aware of in investigating or considering the impacts of a potential trade measure.

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Far from harming downstream industries, the measures would contribute to safeguarding a domestic source of supply for a strategically important input. Maintaining domestic PET production alongside fair-priced imports would reduce the UK's dependence on foreign suppliers, enhance supply security, and improve the resilience of UK manufacturing value chains in the face of external market, transport, and geopolitical disruptions.

APUK strongly opposes the inclusion of a number of countries on the developing countries exemption list and considers that the effectiveness of any safeguarding measure would be significantly undermined if such countries were to be exempt from the application of the safeguard remedy. APUK suggests that the effectiveness of the safeguard measure should be assessed not only on the basis of current import volumes but also in light of the demonstrated capacity of certain exporters to rapidly expand their presence in the UK market. As an example, Vietnam and Egypt have already shown an ability to increase both their export volumes and their share of total imports at a significant pace. Excluding such suppliers would create an obvious avenue through which the intended effect of the measure could be diluted, thereby reducing the relief afforded to the domestic industry and undermining the achievement of the measure's adjustment objective. In particular, APUK would encourage TRA to consider removing the following from the Developing Countries Exemption:

- *Egypt, which increased volumes imported into the UK during the POI by 7,870.6%;*
- *Ghana, which increased volumes imported into the UK during the POI by 3,189.2%;*
- *India, which increased volumes imported into the UK during the POI by 8,223.2%;*
- *Indonesia, which increased volumes imported into the UK during the POI by 116.9%;*
- *Nigeria, which increased volumes imported into the UK during the POI by 15,786.8%; and*
- *Vietnam, which increased volumes imported into the UK during the POI by 2,588.8%.*

Country	Volume in Kg					
	2021	2022	2023	2024	2025	% change
Egypt	66,180	202,807	22,000	1,039,990	5,274,930	7,870.6
Ghana	68,367	-	240,501	1,060,621	2,248,738	3,189.2
India	105,955	3,796,325	1,047,565	4,959,068	8,818,814	8,223.2
Indonesia	3,833,714	8,395,517	10,604,422	7,253,780	9,780,379	116.9
Nigeria	61,563	1,204,832	5,430,409	7,892,893	9,780,379	15,786.8

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Vietnam	*440,000*	*2,429,700*	*10,736,350*	*16,044,109*	*11,830,770*	*2,588.8*

[Figures obtained via HMRC Trade Data]

The exclusion of countries that are among the fastest-growing sources of imports from the scope of the safeguard measure would significantly impair the effectiveness of the safeguard measure and diminish its ability to remedy the serious injury suffered by the domestic industry.

As the TRA may noticed in the above figures, in certain countries there was a slight decline in imports as between 2022 and 2023. This is reflective of a slight contraction in total UK demand between 2022 and 2023. This contraction was as a result of the market stabilising post-covid and instead should be viewed as a return to more typical market demands. Prior to 2023, there was a surge in demand as a result of covid-19 as PET is a key component in producing certain PPE products, such as face shields and sanitizer bottles. In addition, there was a general market shift of consumer behaviour to packaged food products during covid-19 2023, leading to an increase in demand for PET.

Appendix reference: NA

H3 Impacts on groups with protected characteristics

1. As a public body, the TRA has an obligation under the Equality Act 2010 to ensure that the potential effects of measures on different groups or individuals with characteristics are considered. The Public Sector Equality Duty (PSED) covers the following protected characteristics:
   - Age;
   - gender reassignment;
   - marriage or civil partnership;
   - pregnancy and maternity;
   - disability;
   - race;
   - religion or belief;
   - sex;
   - sexual orientation.

   Provide any relevant information about whether any of these groups or any other particular group might be disproportionately affected if a safeguard measure was imposed.

No adverse effects are identified with the characteristics protected.

Appendix reference: NA

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SECTION I: Checklist and appendices

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

Section	Please tick if you have responded to all questions
Section A – Company structure and operations	√
Section B – About your goods	√
Section C – Costs and production	√
Section D – Sales	√
Section E – Increase in Imports	√
Section F – Serious Injury	√
Section G – Adjustment Plan	√
Section H – Economic Interest Test	√

+Add additional rows as required

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

Appendix reference	Document title
A3.2	Organisational Structure
A5.1.1. to A5.1.2	Logistics Agreements
A6.3.1, A6.3.2, A6.3.3, A6.3.4, A6.3.5	2021 – 2025 Financial Statements
A6.4	2025 Trial Balance
A6.5	2025 Management Accounts
B1.1	ICIS Commodity Report
C5.2.a and C5.2.b	Transaction Documents
F14	Letter to APUK
G1	Updated Adjustment Plan

+Add additional rows as required

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