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United Kingdom

7 September 2026

By TRS
By email: ad0087@traderemedies.gov.uk

NON-CONFIDENTIAL

Dear Madam,
Dear Sir,

Subject: **AD0087 (Glass Containers from China) — Follow-up on Injury Submission filed by Huaxing Group**

Our client: **Guangdong Huaxing Glass Co., Ltd. and its related companies (Foshan Huaxing Glass Co., Ltd and Foshan City Can Shui Huaxing Glass Co., Ltd.) (together '*Huaxing Group*')**

1. We refer to the submission filed with the Trade Remedies Authority ('***TRA***') in the context of the above-captioned investigation on 1 July 2026 by Huaxing Group (the '***Injury Submission***').

2. In the Injury Submission, Huaxing Group highlighted that the evidence put forward by the Applicant in support of its position was wholly insufficient for the purposes of demonstrating that the UK industry was suffering material injury caused by imports of glass containers from China. Quite the contrary, it is clear that the UK industry is not suffering any injury.

3. At the same time, to the extent that the UK industry was considered to be suffering any injury, Huaxing Group put forward clear evidence demonstrating that this was caused by various other factors.

4. In particular, Huaxing Group drew the attention of the TRA to the negative impact of domestic 'environmental' regulation on the UK industry.[1] Despite identifying environmental regulation as a key factor shaping the UK market in the Application, the Applicant failed to address the impact of this factor to any meaningful extent in its causation analysis.

5. Most strikingly, Huaxing Group noted that the Application made no reference whatsoever to the Packaging Extended Producer Responsibility scheme ('***pEPR***'),[2] the UK-wide scheme requiring packaging producers (including the UK industry) to cover the **full** cost of managing household packaging waste.[3]

6. As Huaxing Group noted in its Injury Submission, a revised version of the pEPR scheme came into effect during April 2025 (*i.e.*, during the POI for the investigation), replacing a previous iteration that had first been introduced under the EU Packaging and Packaging Waste Directive, whereby producers paid only a proportion of the costs in question.

7. During the first year of operation of the pEPR (*i.e.*, 2025-2026), UK producers were required to pay flat base fees per tonne of material produced — with no adjustment to account for the recyclability of the material in question. For example, the base fee for glass during this period was GBP 192.[4]

8. When the scheme was first being developed in late 2024, the UK glass industry voiced considerable concern with respect to how the fees for the scheme were established, and the fact that there would be a disproportionate cost burden on heavier materials (*i.e.,* glass).[5]

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1 Huaxing Group – Injury Submission, at Section 5.2.1.
2 The Producer Responsibility Obligations (Packaging and Packaging Waste) Regulations 2024, available here.
3 House of Commons Library Research Briefing, *Packaging extended producer responsibility*, 13 January 2026, available here.
4 House of Commons Library Research Briefing, *Packaging extended producer responsibility*, 13 January 2026, available here.
5 Packaging News, FPA highlights packaging industry concerns over EPR fees based on weight, 13 September 2024, available here.

9. During the POI, it became abundantly clear that the cost burden associated with the pEPR posed a direct threat to the long-term competitiveness of the UK industry. In May 2026, the industry body British Glass argued that glass producers were being placed at a competitive disadvantage compared to other materials such as plastic and aluminium — which did not face equivalent costs despite concerns over recyclability and emissions.[6] To this end, British Glass warned that the cost impact of the pEPR for the UK industry — amounting to an uplift of approximately GBP 0.10 – 0.12 per item — was leading many UK producers to reconsider investment plans to modernise facilities and cut carbon emissions. According to British Glass, around 20 separate sites were reconsidering investment plans of up to GBP 100 million each, potentially jeopardising up to 120,000 jobs in the wider supply chain.[7]

10. Quite obviously therefore, to the extent that the UK industry suffered injury during the POI, such injury was directly caused by the disproportionate cost burden inflicted on UK producers during the early implementation of the pEPR.[8]

11. Consequently, Huaxing Group respectfully submits that the TRA must take this relevant factor into consideration for the purposes of making its findings for the purposes of the present investigation. To the extent that the UK industry is suffering injury, this has been caused by a factor of only temporary relevance, with the situation of the UK industry set to recover strongly in the near future. For this reason and the reasons already explained in the Injury Submission, Huaxing Group submits that the TRA should ensure that any injury attributed to pEPR is not wrongly attributed to imports of glass containers from China — and should take account of the imminent mitigation of that injury when assessing injury, causation, and the need for measures.

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6 LLB, *Glass industry warns 120,000 jobs at risk as levy drives investment overseas*, 9 May 2026, available here.

7 LLB, *Glass industry warns 120,000 jobs at risk as levy drives investment overseas*, 9 May 2026, available here.

8 Moreover, this situation is set to markedly improve in the imminent future. Since 1 July 2026, the pEPR has undergone a methodological change which will lower the fees owed by the UK glass industry under the scheme. See British Glass, RAM 2027 – A positive outlook for glass, available here.