Trade Remedies Authority

Subsidy Questionnaire (Importer)
Case AS0088: Glass containers originating in the Republic of Türkiye (Türkiye)

Period of Investigation (POI):	1 January 2025 – 31 December 2025
Injury period:	1 January 2022 – 31 December 2025
Deadline for response:	**22 May 2026**
Contact details:	AS0088@traderemedies.gov.uk
Completed on behalf of:	*AEGG Limited*

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 (www.trade-remedies.service.gov.uk) by **21 May 2026**.

Trade Remedies Authority

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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 glass containers from Türkiye are causing injury to producers in the UK because the goods have benefited from a subsidy from a foreign authority.

A subsidy exists if there is either a financial contribution by a foreign authority or a form of income or price support, which confers a benefit on the recipient (usually an industry or business manufacturing goods).

Not all subsidies are countervailable (meaning they can be offset through trade remedies). A subsidy is countervailable if it is specific to certain companies or industries and granted either directly or indirectly for the manufacture, production, export or transport of goods.

Why should I take part?

We are seeking your cooperation as a UK importer of the goods concerned to identify whether a countervailing duty may be required to counteract the effect of a subsidy.

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 the facts available, including those contained in the application for the initiation of the investigation by the domestic industry.

To note, we use the term **company** in this questionnaire to cover all businesses including partnerships and sole traders.

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 **21 May 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 AS0088@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 (Dumping and Subsidisation) (EU Exit) Regulations 2019 as Amended by the Trade Remedies (Amendment) (EU Exit) Regulations 2019* and under 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 think you won't be able to complete the questionnaire within the required time, please contact the case team ahead of the deadline using the contact details on the cover of this questionnaire. You should outline the length of extension you need and the reasons why. We will notify you of our decision.

If we can accommodate an extension, we will publish a note on our public file to record both the request and the extension granted.

How to answer the questions

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 verify 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 rather than leaving the answer blank.
- Please complete the spreadsheet annex as requested. Annex are named to correspond to the relevant sections of this questionnaire and must be completed with reference to the instructions provided. 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 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., 23/05/2023).
- 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 tax unless otherwise stated.
- Please refer to the case number, **AS0088**, 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. We will publish the non-confidential version on the public file. **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).
- 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 46 of the *Trade Remedies (Dumping and Subsidisation) (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, which is available on https://www.trade-remedies.service.gov.uk/public/case/AS0088/.

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 good and/or goods concerned.

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 importer of the goods concerned or the like goods, they should **also** complete an Importer questionnaire. Please make sure you provide your subsidiaries with access to it.
- If your subsidiaries or associated companies are not UK importers but are involved in the downstream sales of the goods concerned or the like 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 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
- the non-confidential responses will be placed on the public file; and
- the case team may contact you to arrange a visit to verify the information contained in your responses.

Verifying the information you supply

The TRA will verify, as far as possible, the information provided to us. As part of this process, we may conduct verification visits. If we need to verify information that you provide by visiting your premises, 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 verification.

In some circumstances, verification may be conducted remotely.

Once verification is complete, the TRA will prepare a report and share a draft with you. We 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.

The scope of this investigation

Goods concerned

This investigation covers glass containers exported from Türkiye, described as:

> *Carboys, bottles, flasks, jars, pots, phials, preserving jars, and other containers, of glass, of a kind used for the conveyance or packing of goods; whether or not including a closure. Not including ampoules; containers made of tubular glass; glass containers with a nominal capacity of 2.5 litres or more; or standalone stoppers, lids, or other closures of glass.*

These glass containers are currently classifiable within the following commodity code(s):

70 10 90 10 00	70 10 90 51 00	70 10 90 67 00
70 10 90 41 00	70 10 90 53 00	70 10 90 71 00
70 10 90 43 00	70 10 90 55 00	70 10 90 79 00
70 10 90 45 00	70 10 90 57 00	70 10 90 91 00
70 10 90 47 00	70 10 90 61 00	70 10 90 99 00

These codes are only given for information.

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 sales and distribution of goods which are like the goods concerned. Any reference to '**like goods**' in this questionnaire refers to goods which are like the goods concerned in all respects, or with characteristics closely resembling them.

Please follow the instructions for each question to provide the appropriate information.

Product Control Numbers

The TRA uses Product Control Numbers (PCNs) to define and distinguish the different types of products that fall under the goods description above.

PCNs, which come in the form of an alphanumeric code**,** help to create a categorisation system so that comparisons can be made between goods produced in the domestic UK market and those produced in foreign markets.
In this questionnaire and the corresponding annex, you will be asked to assign PCNs representing the different types of products you import. When stating your PCNs, please do not use any spaces, dashes or other means of separation, and ensure you follow the order of characteristics outlined in the table below. Please use this PCN structure consistently throughout your questionnaire response, including the corresponding spreadsheet annex.

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

* Extra-white flint can be defined by its low iron content and colour using the following definition developed for the EU Emissions Trading Scheme.

"An iron oxide content expressed as percent Fe2O3 by weight lower than 0.03% and colour co-ordinates of L in the range 100 to 87, of a in the range 0 to -5 and of b in the range 0 to 3 (using the CIELAB advocated by the Commission Internationale d'Éclairage)."

Some examples of products and their corresponding PCNs are below:

- An amber pharmaceutical bottle (coloured via the furnace tank) with a nominal capacity of 50ml, weighing 40g, with a standard design and not provided with decoration. This good would be food assured and pharmaceutically assured but not volumetrically assured, and not suitable for use with pressurised products. This good was manufactured using 20% external cullet and is supplied with a lid.
  = **CCBA FPNN BSNY**
- A standard flint (clear) food jar with a nominal capacity of 250ml, weighing 202g with a standard generic design and provided with an adhesive label at the factory. This good is not assured for use with foods, pharmaceuticals or pressurised goods. It is not volumetric, was not manufactured using external cullet, and is not supplied with a lid.
  = **SFGN NNNN JSBN**
- An amber beer bottle (coloured via the furnace tank) with a nominal capacity of 500ml, weighing 290g, with a bespoke moulded design, volumetric assurance, usable for pressurised goods and foods but not pharmaceuticals, with a direct printed label and a single colour spray coating. This good was produced using 15% external cullet and is supplied with a lid.
  = **CIHA FNPV BNCY**

(In this questionnaire and the corresponding annexes, you will be asked to construct PCNs representing the different types of products you produce. When giving your PCNs, please use spaces (but no dashes or other means of separation) between the three sections of characters, and ensure you follow the order of characteristics outlined in the table above)

1. Please provide details of any technical or physical characteristic not included in the PCN structure that may affect the price comparison between products.

Not Applicable

2. Please comment on the suitability of the PCN structure in regard to your product range. This may include areas such as:
   - Categorisation of features
   - Number of products included under “other” which may exclude a fair comparison
   - Specialised products which may unduly influence the comparison

Not Applicable

3. Please provide details of any manufacturing process differences which you feel may influence the PCN structure and the price comparison between the goods concerned and the like goods.

With regards to the categorisation of colourless glass as "premium / extra white flint" and "standard", the Applicant notes that silica sand quality—and therefore colour—is primarily driven by iron content, which in turn depends largely on the sourcing of raw sand. As such, availability and sourcing of raw material plays a significant role in determining material characteristics. It is therefore a misrepresentation of the industry to suggest that extra white flint products are "premium" as it is not possible for extra white flint products to command higher prices or margins merely on the basis of colour. Within the glass industry, products as generally considered "premium" or "standard" in connection with end-use rather than by flint appearance or iron content, as the former is much more determinative of market demand and consumer preference. Specifically, "premium" products are generally considered to cover sprits and perfumes, and "standard" should be defined as covering fruit juice, water, condiments, jams / fruit preserves and other food. By way of example, in practice extra white flint glass can be (and is) used for mass produced jam jars – such as for the Respondents business - and it is misleading for this to be categorised as a ‘premium’ product when customers would in no sense consider this to be the case, nor accept pricing on this basis.

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:	AEGG Ltd
Legal structure (e.g., limited company, PLC etc):	Limited company
Year of establishment:	2009
Other operating names:	NA
Company registration number:	07006709
Place of registration:	Oaksmere Business Park Eye Airfield Industrial Estate, Yaxley, Eye, Suffolk, England, IP23 8BW
Name (point of contact):	[*Redacted – Personal Information*]
Position:	Procurement Director
Address:	Same as company
Telephone No:	NA
Email:	[*Redacted – Personal Information*]
Website:	www.aegg.co.uk

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

Name:	Baker & McKenzie LLP
Address:	280 Bishopsgate, London EC2M 4RB
Telephone No.:	+ 44 20 7919 1173
Email:	[*Redacted – Personal Information*]
Confirm they have signed authority to act (Yes/No):	Y
	Appendix reference: Provided with interested parties registration

A2 About your company

1. Please describe the role of your company, in the UK market, for the like goods and/or goods concerned, (e.g., buying or selling agent, importer/distributor, importer/wholesaler, importer/retailer or importer/end user).

The Respondent is a UK packaging solution provider, including of like and concerned goods. To deliver the glass packaging solutions, the Respondent works with its customers, typically brands, fillers and retailers, to design the required packaging. [*Redacted – commercially sensitive information*]. The Respondent is responsible for the logistics and importation of stock into the UK using its own logistics fleet, as well as for quality assurance processes. Over [*non-confidential range: 80% – 95%*] of Respondent imported concerned and like goods are "AEGG" branded. [*Redacted – commercially sensitive information concerning business* activities] See response to question D.1 for further detail of the Respondent's business.
Appendix reference: NA

2. Please provide details of any changes in the legal form of your business over the past 5 years, for example, mergers, acquisitions and/or sales.

Date	Legal form	Explanation of change
NA		

+Add additional rows as required.

3. List and explain all authorisations your company has been required to obtain to import, sell or distribute the goods concerned and the like goods. These may include licences, permits or permissions. Indicate if your company is subject to any direct or indirect, quantitative or other, restrictions on any of these activities.

The Respondent is not required to obtain any authorisations for its business activities. The Respondent does however maintain a BRCGS certification, see Appendix A2.3.
Appendix reference: A2.3

4. State whether your company is a member of any representative organisations. If so, provide a copy of the relevant documentation.

British Glass Manufacturers Association (see members directory of British Glass, here).
Appendix reference: NA

A3 Organisational structure

1. Please complete **Annex: A1) 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 goods for domestic and export markets. Clearly indicate the different production stages carried out by your company, if applicable.

The Respondent is a private limited company. All company operations, with the exception of operational warehousing, take place from the Respondent's registered address. The Respondent maintains four warehousing facilities in the UK: three in Suffolk (all at or within 300m of the registered address) and one in Grangemouth, Scotland, with a combined capacity exceeding 150,000 sq ft. See Appendix A3.2 for details of the Respondent's organisational structure.
Appendix reference: A3.2

A4 Board members and principal shareholders

1. Please complete **Annex: A2) Owners & Shareholders**.

2. 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 goods concerned or like goods in the UK or Türkiye.

Name	Shareholding in company	Name of other companies in which person holds interest	Activity of other companies

Not Applicable			

3. 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 goods concerned or like goods in the UK or Türkiye.

Name	Position on Board of Directors	Name of other companies in which person holds interest	Activity of other companies
Not Applicable			

+Add additional rows as required

A5 Operational links with other companies or persons

1. Complete the table below if your company has established long-term agreements and/or relationships with any company/companies located in the UK, Türkiye or in third countries 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 with other companies for the supply of goods destined for internal sale (e.g., captive use), please provide the contract to demonstrate this.

Company name and address	Nature of agreement	Company registration number and place of registration	Appendix number of contract
Not Applicable			

+Add additional rows as required

A6 Accounting practices

1. Give the address where your company's accounting records are kept. If records are maintained in different locations, please indicate which records are kept at which location. If records are digital and do not have a physical location, please mark as N/A.

Records address	**What records are held?**
NA – records are digital	

+Add additional rows as required

2. Please give the financial year convention your company uses for its accounts (e.g., 1 January – 31 December). If any changes have occurred with respect to this period or in your accounting practices over the last five financial years, please describe these changes.

1 January to 31 December
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.

See Appendices A6.3.1 to A6.3.4.
Appendix reference: A6.3.1 to A6.3.4.

4. If your accounts are unaudited, please attach a copy of your unaudited financial statements for the injury period.

Not applicable.
Appendix reference: NA

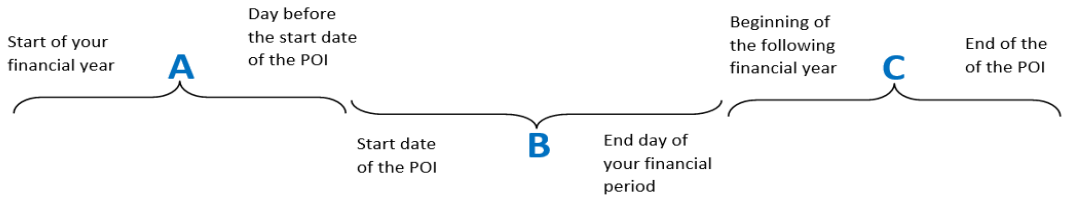
5. Please attach a copy of your company's trial balance (in original and spreadsheet form) covering the POI (1 January 2025 – 31 December 2025). If your financial year is fully aligned with the POI, this is all that is required.

   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 1 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.



Please see Appendix A6.5
Appendix reference: A6.5

6. For your company and any associated parties involved in the import, marketing or sales of the goods concerned, and the like goods, please attach copies of relevant management reports (e.g., profit and loss statement) for the profit centre that includes the goods and like goods. Please provide these reports for the (i) POI and (ii) most recently completed financial year.

See audited accounts at Appendix A6.3.4 for FY 2025. This reflects the POI and is also the most recently completed financial year.
Appendix reference: A6.3.4

7. If your company is part of a group of companies, please attach a copy of the consolidated accounts of the group for the most recently completed financial year.

Not applicable.
Appendix reference: NA

8. 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
   - your company's cost centres.

[Redacted – confidential information concerning AEGG's financial practices] see Appendix A6.5
Appendix reference: A6.5

9. Have you changed your financial policies and/or accounting systems during the injury period? Please explain any changes, including dates and the reasons for those changes along with the financial impact of those changes on the goods concerned or like goods.

[Redacted – confidential information concerning AEGG's financial practices]
Appendix reference: NA

A7 Your company's goods

1. Please complete **Annex: A3) Your company's goods**.

   Please see additional notes in the annex for assistance on how to complete it.

2. Explain the internal coding system your company uses to classify your range of goods concerned.

   Technical documentation (such as sales catalogues, safety standards, technical data, etc.) should be attached for each model where available.

See Appendix A7.2 for an explanation of the internal coding system. See Appendices A7.2.1 to A7.2.4 for technical documentation.
Appendix reference: A7.2 to A7.2.4

3. If your company does not use the same product codes across imports, sales and invoicing, please explain how they differ.

Not applicable.
Appendix reference: NA

4. Please list all main categories of products produced and/or traded by your company and indicate
   - which category covers the goods concerned
   - which incorporate the goods concerned or like goods

See Annex 1: A3.
Appendix reference: NA

5. Indicate in the box below any physical, commercial, or functional differences between the like goods and the goods concerned. If these differences cause distinguishable variations in price, explain those differences and the effect they have. Attach any evidence you have that is relevant.

Not applicable	
	Appendix reference: NA

6. Indicate the relevance of the incorporated goods concerned and/or like goods in relation to the finished product.

Not applicable	
	Appendix reference: NA

A8 Suppliers of the imported goods

1. Please complete **Annex: A4) Suppliers - goods concerned.**

   This tab asks you to provide contact details for each company that supplies you with the goods concerned. For each supplier that is not a manufacturer of the goods concerned, you will be asked to provide details of the manufacturer, if known.

SECTION B: Imports and forward orders

B1 Imports

1. Please complete **Annex: B1) Imports** by country for the injury period for the goods concerned and like goods. Please provide the information on a CIF basis if possible.

   Please see additional notes in the annex for assistance on how to complete it

2. If your imports in **Annex B1 - Imports** have not been made on a CIF basis, please explain the basis on which they have been reported.

[*Redacted – Explanation of AEGG pricing – commercially sensitive information*]
Appendix reference: NA

B2 Cost Reconciliation

1. Please complete the cost reconciliation table in **Annex: B2) Cost Reconciliation**.

   Please see additional notes in the annex for assistance on how to complete it.

B3 Details of import transactions

1. Please complete the **Annex: B3) Import transactions**, providing transaction level details of imports of the goods concerned from Türkiye during the POI.

   Please see additional notes in the annex for assistance on how to complete it

2. Please provide invoices and any supporting documents for two of the transactions stated within **Annex: B3) Import transactions**. Use the box below to give an overview of any supporting documents provided.

Please see Appendices B3.2.1 and B3.2.2. [*Redacted – Explanation of AEGG pricing – commercially sensitive information*]
Appendix reference: B3.2.1 and B3.2.2

3. Referring to the costs you stated in **Annex: B3) Import transactions**, for the goods concerned please indicate which costs were incurred by your company

between frontier and arrival of the goods at your warehouse and categorise them as duties, import costs or post-import costs. Are these costs incurred as a percentage of the purchase price, or as a fixed amount per unit of the goods concerned?

[*Redacted – Explanation of AEGG pricing – commercially sensitive information*]
Appendix reference: NA

B4 Forward orders

1. Please provide details in **Annex: B4) Forward orders** and attach copies of forward contracts/ongoing supply agreements for the goods concerned for up to one year ahead. Comment on these forward contracts – are they a usual way of doing business in your industry? Has there been any variation in the volume and value of forward contracts over time? If so, what has caused this variation?

Not applicable
Appendix reference: NA

SECTION C: Sales and selling expenses

C1 Sales of the goods concerned

1. Please complete **Annex: C1) Sales**. Provide annual sales figures for the goods concerned imported from Türkiye and the like goods from all other countries imported into the UK by your company. Please state the value and quantity of these goods sold in the UK or re-exported during the injury period. Where known and if applicable, please state each source country of the like goods.

C2 Sales reconciliation

1. Please complete the Imports reconciliation table in **Annex: C2) Sales reconciliation**.

Please see additional notes in the annex for assistance on how to complete it.

C3 Sales of goods incorporating the goods concerned and/or like goods

1. If applicable, please complete **Annex: C3) Sales incorporating the goods concerned or like goods**, providing information on the value and volume of goods produced by your company incorporating the goods concerned or like goods, where the good concerned or like goods are sourced from Türkiye and all other countries and the end product is sold in the UK or exported.

C4 Sales transactions

1. Please complete **Annex: C4) Sales transactions**. Please provide the requested information for the goods concerned you sold on the UK market during the POI.

2. Please provide invoices and any supporting documents for two of the transactions stated within **Annex: C4) Sales transactions.** Use the box below to give an overview of any supporting documents provided.

Please see Appendices C4.2.1 and C4.2.2.
Appendix reference: C4.2.1 and C4.2.2

SECTION D: Cause of injury

The purpose of this section is to collect further information as to the cause of the alleged injury. Note that the information submitted at this point can only be taken into account if supported by **factual evidence**.

1. Aside from the imports of the goods concerned from the country under investigation, please provide details of any other reasons that could have resulted in the alleged injury suffered by the UK industry, for example: contraction in demand or changes in the pattern of consumption of the like goods in the UK or developments in technology.

The Respondent does not agree that imports from Turkey have caused injury to the Applicant / UK industry and instead considers that the following factors bear a genuine and substantial causal link with any injury or other detriment allegedly being suffered.

(a) Impact of Other Foreign Imports

Turkey's share of the import market is relatively insignificant. On average across the injury period, Turkey is only the 7th largest importer by value of concerned goods, holding only 5% share of the import market. In contrast, China holds over double that of Turkey (with 11.5% share) and EU countries together hold over 10 times that of Turkey (with 57% share, as illustrated in Table 2 below). It is therefore difficult to see the basis on which Turkish imports are impacting pricing in the UK or otherwise causing injury to UK industry. This is compounded by the fact that [*redacted – commercially sensitive information*] demonstrating that it is in fact UK producers that are exerting downward pressure on pricing in the UK, not Turkish imports. (See Appendices D.1.A to D.1.C)

Whilst noting that UK container glass production data was heavily redacted in the application, market intelligence suggests that UK container glass production in 2019 was 2,500,000 metric tonnes (Appendix D.1.1). Assuming that UK production by volume has remained at this level (as this is the best available data), imports from Turkey would only represent 2.04% of the UK market i.e. a negligible share of the UK market and therefore not capable of causing injury. (Calculated on the basis of HMRC trade data collated using the within scope HS codes (Appendix D.1.2), see note below in relation to the HMRC trade data collated by Applicant).

Table 1: Total Imports to UK by Value

	Value (£)			
	2022	**2023**	**2024**	**2025**
Total imports	440,547,385	473,306,523	417,569,564	363,378,981

Table 2: Percentage of Total UK Import Market by Value of Top 5 Countries

	Value (£)				
Top 5 Countries	**2022**	**2023**	**2024**	**2025**	**Total Av. %**

Ireland	84,389,821	93,961,267	113,669,804	49,240,872	19.94%
France	86,582,218	92,266,236	68,441,077	71,652,991	18.81%
Germany	50,764,760	55,457,554	50,038,885	50,967,317	12.31%
China	43,033,479	45,409,897	49,742,778	54,093,039	11.54%
Italy	33,431,569	33,251,892	19,925,830	18,324,523	6.10%
%	67.68%	67.68%	72.27%	67.22%	**68.70%**

Table 3: Comparison with UK Imports from Turkey by Value

	Value (£)				
	2022	**2023**	**2024**	**2025**	**Total Av. %**
Turkey	23,913,426	23,492,666	16,912,036	20,280,456	5%

Moreover, the Respondent respectfully refers the TRA to the Applicant's allegation of dumping of Chinese imports of glass containers of HS codes within scope of this investigation. It would, in particular, draw the TRA's attention to the fact that the injury sections of both the Turkey anti-subsidy and China anti-dumping applications are entirely the same in terms of substance and claims to the alleged injury suffered.

In light of the much larger proportion of Chinese imports, as well as the fact that such imports have substantially increased during the period of investigation for injury, the Respondent considers that it is imports from China rather than those from Turkey which are causing injury to the UK industry during such period. Therefore, any injury to the UK industry should be addressed through the application of anti-dumping duties on imports from China, rather than countervailing duties on imports from Turkey.

In relation to the above tables, please note the following points for reference:

- The reduction in value of imports as a whole is consistent with the steadily reducing volume of imports year-on-year, discussed further below in the context of the contraction in customer demand.

- Information regarding the import of items of HS codes of concern in this investigation was acquired from HMRC Trade Data, see Appendix D.1.2. For completeness, this trade data was acquired on the basis of the HS codes listed in the "goods concerned" section of this questionnaire and the TRA initiation notice. The Respondent notes that these figures are different to those presented by the Applicant as the HMRC trade data acquired by the Applicant (Appendix A2 of the Application) was over inclusive of HS codes as it included all sub-categories of HS sub-heading 70 10 90 and reflected the period of July 2023 to June 2025.

(b) Cost of UK Production

(i) UK production inefficiencies

Production efficiency is dependent on the equipment and technology used in manufacturing facilities, with newer production machines typically enabling improved changeover times and more precise weight balancing, thereby reducing costs and waste. [*Redacted – commercially sensitive information / commentary based on third party intellectual property.*]

In addition, with the exception of [*Redacted – commercially sensitive* information], production facilities are not designed to produce to the same large-scale volumes per run as those in Turkey, [*Redacted – commercially sensitive information / commentary based on third party intellectual property*] (see Appendices D.1.3 to D.1.5). We trust this shall be further illustrated as part of the verification site visits.

[*Redacted – information concerning customers – commercially sensitive information*]

The Respondent is mindful that there are likely to be ways in which UK manufacturers can increase their efficiency, either through investing in better equipment and technology and/or through other efficiency improvements to the operation of their plants. [*Redacted – commercially sensitive information*.]

(ii) UK Energy costs

Glass container manufacturing is exceptionally energy intensive, as a result of the high melting points of the raw material inputs (silica sand, soda ash and limestone). The UK has been in an energy crisis since the Autumn of 2021 (i.e., well before the start of the injury period of the investigation) as a result of surges in pricing in the wholesale gas market. This was compounded following Russia's invasion of Ukraine in February 2022. From 2021 to 2023, electricity prices for UK industrial users (which would include UK glass producers) rose by 90% (from 14.81 pence per kilowatt hour) to 28.39 pence per kilowatt hour). While the price of electricity has fallen from this peak since 2023, the average price is still 75% higher than 2021 pricing. The average gas price for industrial users followed a similar pattern, increasing from 2.50 pence per kilowatt hour in 2021 to 7.18 pence per kilowatt hour in 2023, with the average now falling below this peak but still more than double 2021 prices at 5.52 pence per kilowatt hour (Appendix D.1.7). The price of energy has again surged following the US conflict with Iran.

The UK has the highest industrial electricity prices of all International Energy Association participants (Appendix D.1.7). In recognition of the significant and detrimental impact that UK energy prices put UK glass producers at, British Steel has been lobbying UK Government to take steps in this space. (Appendix D.1.8).

As a result of this, glass manufacture in the UK has become very expensive, with clear impacts on pricing and profitability, as British Glass itself has emphasised on a number of occasions. (Appendix D.1.9).

(iii) UK's Extender Producer Responsibility Tax

The introduction of the UK Extender Producer Responsibility Tax (“EPR”) has had a further significant and detrimental effect on the cost of UK production. This is owing to the fact that fees are based on weight of products, with UK producers consequently having to increase prices resulting in lost sales and lost customers. This is discussed in further detail below, together with examples of consequent impact on UK job losses.

(c) Contraction of Demand

The UK glass market is softening and therefore there is a decline in consumer demand for glass containers. According to British Glass, this contraction is particularly pronounced when comparing pre-covid demand as against post-covid demand, with a decline of approximately 12.5% from 2.4 million tonnes in 2018 to 2.1 million tonnes in 2025, based on put-on-market data (Appendix D.1.10).

There are two key elements which are driving this market contraction in the UK: (i) a global declining alcoholic beverage market; and (ii) the introduction of the UK's EPR

(i) Global Declining Alcoholic Beverage Market

The global alcoholic beverage market declined 2% by value and 4% by volume in 2025 (Appendix D.1.11). The downturn in the alcoholic beverage market – which has been steadily and consistently declining post-covid in the UK - is driven by weakened consumer demand following a move to more moderate drinking trends stemming from health consciousness and cost of living concerns (Appendix D.1.12), as well as the imposition of alcohol taxes raising the cost of alcohol for consumers. In particular, across 2025 there have been a number of production breaks from key players in the industry sector, such as Pernod Ricard, Diageo and Brown-Forman, with industry commentators suggesting that this is as a result of weakened demand and oversupply in the relevant spirits markets (Appendix D.1.13).

By way of specific example, post-2021 the UK gin market has been contracting, with the volume of premium gin falling 16% year-on-year from 2023, with an continue decline of 5% through to 2028 expected. Between 2023 and 2024 the entire UK gin market dropped volume by 13% (Appendix D.1.14). Moreover, the general decline in the UK spirits market has been specifically acknowledged by UK glass producers (see, Verallia Interim Financial Report 30 June 2025, Appendix D.1.15, *"[The] spirits [market] in the United Kingdom […] continued to suffer from a declining market environment"*).

The resulting impact of the decline of the alcoholic beverage industry is twofold: (i) there is a reduced demand for glass containers in scope of this investigation as there are simply less sales of spirits packaged into glass bottles; and (ii) glass bottles for alcoholic beverages are typically higher-margin products, the decline of which has a disproportionate negative impact profitability. [*redacted: graph demonstrate price differential between food jars and spirit bottles – third party intellectual property*]

(ii) UK's EPR Tax

The UK's EPR Tax came into effect on 1 April 2025, under which UK producers of packaging pay a fee designed to cover the full lifecycle costs of packaging (including collection, recycling and disposal). The intention of the EPR Tax was to incentivise producers to move to more sustainable packaging, as such packaging incurred lower fees. However, as the fees are based on weight of products, UK glass producers have been disproportionately impacted, with UK producers potentially looking to pass such costs (or a proportion of such costs) onto UK downstream participants. Accordingly, the upward pricing pressure as a result of the introduction of EPR is leading to market contraction.

The significant and detrimental impact of the EPR Tax to UK glass production has been well ventilated, including in Parliament:

- In Parliamentary debate on 14 May 2025 regarding EPR, Sarah Champion MP referred to EPR as "*decimating the domestic glass industry*". (Appendix D.1.16)

- British Glass has stated that the introduction of EPR will be extremely detrimental to the UK glass industry and see the glass' market share supressed, causing significant financial pressure leading to demand reduction and inevitably site closures and job losses due to material switching. (Appendix D.1.17.a and Appendix D.1.17.b)

- ENCIRC, UK glass producer, has restructured its UK business, including making redundancies (notwithstanding it currently remaining profitable) which it stated it had done to adapt and respond to challenges posed by high energy prices, reduced demand due to the cost-of-living crisis and EPR. (Appendix D.1.18)

The negative impact on UK Industry arising from the decline in consumer demand and the introduction of EPR has been expressly acknowledged by UK glass producers:

- Verallia's press release concerning its 2025 annual results (published 24 February 2026), Appendix D.1.19, reports a 3.6% decline in revenue for 2025 as against 2024 with the group CEO appearing to attribute this to "*an environment where end consumption remained soft".* Of note, no attribution was made to Turkish glass imports into the UK as a causal factor.

- In February 2026, Verallia issued a press release outlining new projects aimed at adapting its industrial footprint (i.e., closure and re-opening of certain facilities across Europe, including the UK) following a 13% contraction in the volume glass market in 2023, with volume decline being linked to reduced alcohol consumption in Europe. In particular, the Verallia press release attributes its actions in the UK to the market being in decline, particularly in the spirits sector. Appendix D.1.20. Importantly, the press release does not attribute the measures being taken in the UK to any imports of Turkish glass into the UK market.

- Fitch Ratings downgraded and then withdrew ratings concerning Ardagh Group in April 2025 in response to, what Fitch states, was Ardagh's underperformance and referencing market challenges such as glass business demand being subdued and trends like declining alcohol consumption amongst young adults as pressuring sales volumes. Of note, Fitch does not reference Turkish imports of glass into the UK as a "challenging market factor" influencing its decision. Appendix D.1.21.

It would therefore be logical to conclude, as already expressly acknowledged by UK glass producers, that any injury that may be being suffered by UK industry is substantially caused by the contraction of demand.

For completeness, this contraction of demand is also reflected in the falling volumes of imports. Total import volume was just over 468,000 MT in 2022 and this has reduced steadily year on year down to just over 365,000 MT in 2025 (HMRC trade data – see Appendix D.1.2).

Overall, given the marginal market share of Turkish imports of concerned goods, and the fact that overall imports are declining, it is difficult to see the basis on which such a small percentage of imports could be causing the alleged injury. Rather, such injury should more convincingly be characterised as being attributable to the imports from other countries and the contraction in market demand, together with the fact that UK producers are much less able to competitively serve that demand given energy and environmental compliance costs and the inefficiencies in aging UK production facilities.

(d) Differentiators of Respondent's Business Model

Finally, the Respondent is mindful of a number of differentiating features that have arguably helped the company build a better reputation with customers as compared to UK glass producers, and this should again be considered as part of the causal analysis for why UK producers may in some instances be losing sales. There are two key aspects to this:

- end-to-end service; and
- enhanced quality of product and suppliers.

End-to-end Service

The Respondent provides a holistic end-to-end service to customers from bespoke design conception right through to delivery and quality assurance, including extensive technical support, as opposed to just providing a distribution / delivery service for third party manufacturers. Specifically, the Respondent:

- works with its customers to design bespoke glass container products suiting their particular needs, including designing the technical specifications;
- [*Redacted – commercially sensitive information concerning supply chain and operations*];
- operates its own logistics fleet to collect and import the concerned goods;
- stores the concerned goods at its warehousing facilities in Suffolk [*Redacted – commercially sensitive information concerning supply chain and operations*];
- delivers to customers from its storage facilities [*Redacted – commercially sensitive information concerning supply chain and operations*]; and
- *[Redacted – commercially sensitive information concerning supply chain and operations*].

The glass products purchased from the Respondent are mostly "AEGG" branded and are considered by customers as the Respondent's products (as opposed to its suppliers' products which the Respondent has delivered), consistent with the Respondent's engagement with customers on each of the above areas. [*Redacted – commercially sensitive information concerning supply chain and operations*.]

The Respondent's differentiators in the glass sector have also been reflected by industry awards, the Respondent won "SME Member of the Year" at the 2024 Glass Focus Awards (Appendix D.1.22), the annual awards created by British Glass and "Entrepreneurial Business of the Year" at the UK Packaging Awards 2025 (Appendix D.1.23).

[*Redacted – commercially sensitive information concerning supply chain and pricing*]

Enhanced Quality of Products and Suppliers

[*Redacted: details of the Respondent's commercial activities and pricing – commercially sensitive information.*]

Appendix reference: D.1.1 to D.1.23

SECTION E: Economic Interest Test

The Economic Interest Test helps the TRA assess the economic impact of a measure compared to what would happen if it the measure was not in place. There are six factors which the TRA must consider as part of the Economic Interest Test:

i) The injury caused by the importation of the subsidised goods to UK industry and the benefits to that industry in removing the injury.
ii) The economic significance of affected industries and consumers in the UK.
iii) The likely impact on affected industries and consumers in the UK.
iv) The likely impact on particular geographic areas, or particular groups, in the UK.
v) The likely consequences for the competitive environment and for the structure of markets for goods in the UK.
vi) Other matters that the TRA considers relevant.

The questions in this section will contribute to this assessment. Please provide information broken down by each of your company's UK sites/facilities, where relevant and possible.

E1 Background

1. Please complete **Annex: E1) UK Domestic Companies.**

   Please see additional notes in the annex for assistance on how to complete it.

2. Please provide an overview of your downstream supply chain. Please indicate who the consumers of glass containers are, which industry and level of trade they relate to, and whether they are companies or private individuals.

The Respondent sells 100% of its products to fillers and brands. [*Redacted: details of the Respondent's commercial activities – commercially sensitive information.*] The fillers and brands will then fill the glass container products, once filled the items are generally sold through retailers, restaurants and pubs.
Appendix reference: NA

E2 Your company

1. Please complete **Annex: E2) Employment by location**, providing employment figures in full-time equivalents (FTE) for each of your company's UK sites or facilities.

2. How would these employment figures be affected if a countervailing measure was imposed? Please support your claims with evidence.

The Respondent would likely be impacted significantly by the envisaged CVD measures as it sources [*non-confidential adjustment to drafting for commercial sensitivity: large volumes*] of its glass products from Turkey.

[*Redacted: details of the Respondent's internal business structure – commercially sensitive information.*]

Appendix reference: NA

3. How would your domestic sales of glass containers be affected if a countervailing measure was imposed? Please support your claims with evidence.

The Respondent currently imports [*Redacted – commercially sensitive information concerning supply chain*], totalling a [*non-confidential adjustment to drafting for commercial sensitivity: large*] exposure to Turkey (based on 2025 volume and value figures). [*Redacted – commercially sensitive information concerning business operations*.]

Given this is a very low margin business, as discussed above [*Redacted – commercially sensitive information concerning business operations.*]

In other cases, the Respondent would be [*Redacted – commercially sensitive information concerning business operations*] as discussed in section E2.4 and E3.

Appendix reference: NA

4. How significant are the imports of glass containers relative to your company's overall volume of imports?

Very significant. As explained above, [*Redacted – commercially sensitive information concerning supply chain*], meaning that in total [*non-confidential adjustment to drafting for commercial sensitivity: large volumes*] of the Respondent's glass containers are imported from Turkey (see tabs B1 and B3 of the Importer Annex).

As this translates against the broader Turkish import market, during the POI the Respondent's imports were [*Redacted – commercially sensitive information concerning business operations*] of the total imports from Turkey (see tables below). It is therefore clear that the Respondent would have [*redacted – commercially* sensitive].

[*Redacted – commercially sensitive information concerning business operation*]

As discussed in Section D, Turkey holds only a very small share of the UK market as a whole and it is thus unlikely that the CVD measures will enable UK producers to achieve higher prices themselves given the other constraints arising from costs of production and foreign imports from elsewhere.

Illustration of Turkish import market share by volume and value:

	Sum of Value (£)				Sum of Volume (MT)			
	2022	2023	2024	2025	2022	2023	2024	2025

Total Foreign Imports	440,547,385	473,306,523	417,569,564	363,378,981	468,512.79	454,264.65	420,530.71	365,339.89
Turkey	23,913,426	23,492,666	16,912,036	20,280,456	44,246.92	38,906.38	40,306.05	51,033.29
%	5.42%	4.96%	4.05%	5.58%	9.44%	8.56%	9.58%	13.96%

(Import volume and value based on HMRC trade data, see Appendix D.1.2 and section D.1 commentary in relation to differences to Applicant HMRC trade data.)

Illustration of AEGG's share of Turkish import market share by volume and value:

	Sum of Value (£)			Sum of Volume (MT)		
	2023	2024	2025	2023	2024	2025
Turkey	23,492,666	16,912,036	20,280,456	38,906.38	40,306.05	51,033.29
AEGG	[redacted – commercially sensitive information]					
%	[redacted – commercially sensitive information]					

Finally, we note that the Respondent would not seek to replace sales of Turkish manufactured glass products with UK manufactured glass products. This is because of: (i) the long term investment in the relationship [*redacted – commercially sensitive information concerning supply chain*] premised on careful measures of quality control and review; (ii) [*redacted – commercially sensitive information concerning supply chain*]; and (iii) the Respondent's unique business model offering a more end-to-end bespoke service, which customers value. (This would not be compatible with partnering with UK producers who would in-source part of this in-house.)

These matters are further discussed in section D.

Appendix reference: D.1.2

E3 Potential impacts of a measure

1. Please describe how you would expect an increase in the import prices of glass containers to affect each of the following. Where possible, please support your claims with evidence.
   - Domestic prices of glass containers in the UK;

[*Redacted – commercially sensitive information concerning* operations], it is not anticipated that this CVD measure on its own would materially impact UK pricing (of glass containers) as a whole, given that Turkey holds such a small market share, as discussed in section D and E3(1).

Moreover, customers may switch to other foreign imports rather than to UK domestic producers, mindful of the differences in quality of glass and UK production costs and capacity

constraints discussed in section D. There would thus not likely be any benefit to the UK with respect to raising UK producer prices. [*non-confidential adjustment to drafting for commercial sensitivity: Alternatively, to the extent that the CVD measure impacted UK pricing more broadly, it is possible that changes made by UK industry to compensate will impact customer-facing pricing and thus would again not benefit the UK. This is discussed further in E3.2*]
Appendix reference: NA

- Total UK production of glass containers;

As mentioned in response to D.1., the Respondent maintains that any injury is more likely caused by inherent UK market factors, in particular decreases in demand, energy costs and the introduction of EPR. As such, even if the price of imports from Turkey increased, UK production is unlikely to benefit.
Appendix reference: NA

- Total imports of glass containers from Türkiye and other third countries to the UK; and

As demonstrated by HMRC trade data (Appendix D.1.2) imports into the UK of like and concerned goods have been declining year on year from 2022 to date. If countervailing duties were imposed causing an unfair shift away from the Turkish market, it is more likely that imports from one or more alternative overseas suppliers would increase.
Appendix reference: D.1.2

- Total exports of glass containers from the UK.

It is unclear on what basis there would be an impact to exports of glass containers as a result of any measure being imposed.
Appendix reference: NA

2. Do you know of any related industries that would be affected if a countervailing measure was imposed?

   Please consider in particular:

   - Upstream industries – those who produce inputs (such as raw materials) needed for the production of glass containers.

Unlikely impacted
Appendix reference: NA

- Downstream industries – those who purchase glass containers;

[*Redacted – commercially sensitive information concerning* operations], it is not anticipated that this CVD measure on its own would materially impact UK pricing (of glass containers) as a whole, given that Turkey holds such a small market share, as discussed in section D and E3(1). There would thus likely be no benefit to UK producers.

[*non-confidential adjustment to drafting for commercial sensitivity: Alternatively, to the extent that the CVD measure impacted UK pricing more broadly, it is possible that changes made by UK industry to compensate will impact customer-facing pricing and thus would again not benefit the UK. Factors which might impact UK industry decisions here include:*

- Production and sale of glass containers is a low margin business, as demonstrated above.
- [*non-confidential adjustment to drafting for commercial sensitivity: Trends in the glass markets of other geographies in changing market conditions.*]
- It is difficult for fillers to switch between suppliers given each filler would need to update all retailer specifications and this would take considerable time
- There are capacity constraints on the domestic industry arising from the small-scale production equipment and land-locked sites. [*Redacted – commercially sensitive information concerning business operations.*]

[*Redacted – commercially sensitive information*] fillers and brands might chose to re-locate operations overseas i.e. rather than purchasing glass containers in the UK and then filling locally for supply of finished products to the market, the filler / brand would purchase and fill the glass container overseas with finished products instead imported into the UK. To illustrate: filler purchases glass containers of Turkish-origin from the Respondent in the UK and fill the containers in the UK vs. filler purchases Turkish-origin glass containers from alternative suppliers overseas and then fills said containers in the overseas market, the finished product would then be imported into the UK market. The Respondent understands from market intelligence that [*redacted – commercially sensitive information obtained via internal* intelligence] has already taken this step and relocated its filling operations [*non-confidential amendment to drafting for commercial sensitivity: overseas*] (i.e. sourcing overseas produced glass containers, filling said containers [*non-confidential amendment to drafting for commercial sensitivity: overseas*] and then importing the finished product into the UK). If this approach was adopted more generally, there would be a significant and negative impact to UK industry as the UK glass container market, as well as domestic filling operations, could collapse.

Appendix reference: NA

- Industries for complimentary goods – those which would typically be bought alongside glass containers (such as ink being bought with printers); and

NA	
	Appendix reference: NA

- Industries for substitute goods – those which might be bought instead of glass containers (such as margarine instead of butter).

NA	
	Appendix reference: NA

3. To what extent would you expect any changes in prices of glass containers to be passed onto final consumers?

[*Redacted: Commercially sensitive information.*]	
	Appendix reference: NA

4. Would your plans for investment or expansion in the UK over the next five years be affected if a countervailing measure was imposed? Please support your claims with evidence.

[*Redacted: details of the Respondent's commercial activities – commercially sensitive information.*]	
	Appendix reference: NA

5. As a public body, the TRA has an obligation under the Equality Act 2010 to ensure that the possible effects of its activities on different people are considered. This public sector Equality Duty covers the following protected characteristics:
   - age,
   - disability,
   - gender reassignment,
   - marriage or civil partnership,
   - pregnancy and maternity,
   - race,
   - religion or belief,
   - sex, and
   - sexual orientation.

   Please provide any relevant information about whether the imposition of a countervailing measure might disproportionately affect any of these groups or any other particular group.

Not applicable	
	Appendix reference: NA

13. How would the number or range of suppliers in the glass containers market be affected if a countervailing measure was imposed? Please provide an explanation.

If CVD measures foreclosed Turkish suppliers from the market [*redacted – commercially sensitive information*], UK customers would have reduced choice.
Appendix reference: NA

14. How would the suppliers' ability to differentiate their products by price, quality, service or innovation in the glass containers market be affected if a countervailing measure was imposed? Please provide an explanation.

Not applicable
Appendix reference: NA

15. How would the cost of switching between suppliers in the glass containers market be affected if a countervailing measure was imposed? Please provide an explanation.

Costs of switching are likely to be expensive for UK fillers, as each filler will need to update all retailer specifications and this can take considerable time.
Appendix reference: NA

16. How would the suppliers' ability to set agreed prices between themselves or for certain consumers or products be affected if a countervailing measure was imposed? Please provide an explanation.

Not applicable
Appendix reference: NA

17. How would the choices of glass containers available to consumers be affected if a countervailing measure was imposed? Please provide an explanation.

Not applicable
Appendix reference: NA

18. How would the ability of downstream businesses or consumers to make informed decisions be affected if a countervailing measure was imposed? Please provide an explanation.

Not applicable

Appendix reference: NA

Are there any additional economic factors that you consider to be relevant for the Economic Interest Test in this investigation?

No
Appendix reference: NA

SECTION F: 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: Imports and forward orders	√
Section C: Sales and selling expenses	√
Section D: Cause of Injury	√
Section E: 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**
A2.3	BRCGS Certificate
A3.2	AEGG organisational structure
A6.3.1	2022 Annual Accounts
A6.3.2	2023 Annual Accounts
A6.3.3	2024 Annual Accounts
A6.3.4	2025 Annual Accounts (unpublished)
A6.5	Trial Balance
A7.2	Internal Coding System
A7.2.1	Aegg Glassware Brochure Bottles
A7.2.2	Aegg Glassware Brochure Food
A7.2.3	Spirit Bottle Brochure
A7.2.4	Aegg Wine Bottle Brochure
B3.2.1	Sample Import Invoice
B3.2.2	Sample Import Invoice
C4.2.1	Sample Sales Invoice
C4.2.2	Sample Sales Invoice
D.1.1	Department of Energy glass report
D.1.2	HMRC Trade Data for concerned goods
D.1.3	Profile – UK Producer
D.1.4	Profile – UK Producer

D.1.5	Profile – Overseas Producer
D.1.6	Customer Feedback
D.1.7	Office for National Statistics – energy costs
D.1.8	British Glass End of Year Review 24-25
D.1.9	British Glass press release re energy crisis
D.1.10	Commentary on UK market since Covid
D.1.11	Alcohol suffers global downturn
D.1.12	FT Article – Alcohol consumption
D.1.13	Spirits Business Article re Production
D.1.14	UK Gin Market Decline
D.1.15	Verallia 2025 First Half Financial Report
D.1.16	UK Parliament Debate re EPR
D.1.17.a	British Glass – EPR fees
D.1.17.b	British Glass responds to Chancellor
D.1.18	Encirc Restructuring
D.1.19	Verallia 2025 annual result press release
D.1.20	PR Verallia industrial footprint
D.1.21	Fitch Downgrades Ardagh
D.1.22	Aegg wins
D.1.23	UK Packaging News Article
D.1.A	Customer Email
D.1.B	Customer Email
D.1.C	Customer Email
E2.3.1	Packaging Dive Article
E2.3.1	Wine Enthusiast Article

+Add additional rows as required