



# Final Recommendation

Review No. TS0069

Transition review of a countervailing measure applying to continuous filament glass fibre products originating in Egypt

15 December 2025

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## Section A: Introduction

1. This section briefly summarises the legal framework for this recommendation to the Secretary of State for Business and Trade (Secretary of State) and the Trade Remedies Authority (TRA)'s main findings. The background to and details of the review are explained in the subsequent sections.
2. This document sets out our recommendation and the facts on which we have based this recommendation. It should be read in conjunction with other public documents available for this case on the [public file](#).
3. For further information about our investigations, please see our [public guidance](#).

### A1. Legal framework

4. This recommendation is made pursuant to regulations 100 and 100B of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019<sup>1</sup> (the Regulations). In accordance with regulation 100(2)(b) of the Regulations, this recommendation includes:
  - a description of the goods to which the recommendation relates;
  - the names of overseas exporters, as well as the exporting country;
  - a summary of the review; and
  - the reasons for the recommendation.

### A2. About this review

5. This is a transition review of a United Kingdom (UK) trade remedies measure under regulation 97 of the Regulations, specified in the [Notice of Determination 2020/37](#). This UK measure gives effect to [European Union \(EU\) Commission Implementing Regulation \(EU\) 2020/870 of 24 June 2020](#). The EU measure transitioned into UK law, and as set out in the [Taxation Notice 2020/37](#), took effect as a UK measure on replacement of EU trade duties.
6. This review concerns a countervailing measure applying to continuous filament glass fibre, also known as glass fibre reinforcements (GFR), originating in Egypt. A full goods description can be found in [Section D: The goods and UK industry](#). We initiated the review on 18 March 2025 and published the [Notice of Initiation \(NoI\)](#) on that date.
7. The Period of Investigation (PoI) for the review was 1 January 2024 to 31 December 2024. In order to assess injury, we chose to examine the period from 1 January 2021 to 31 December 2024 as the injury period.

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<sup>1</sup> Statutory Instrument 2019/450, as amended.

## **Section B: Summary and findings**

### **B1. Subsidy likelihood assessment**

8. In accordance with regulation 99A(1)(a) of the Regulations, we assessed whether importation of the subsidised goods subject to review would be likely to continue or recur if the countervailing amount was no longer applied to those goods.
9. We determined that it is likely, on the balance of probabilities, that importation of the subsidised goods subject to review would continue in increased volumes if the measure was no longer applied to those goods.

### **B2. Injury likelihood assessment**

10. In accordance with regulation 99A(1)(b) of the Regulations, we considered whether injury to the UK industry in the like goods would be likely to continue or recur if the countervailing amount was no longer applied to the goods subject to review.
11. The TRA has concluded that there is no evidence of a UK industry in the like goods, and therefore no likelihood of continued or recurring injury to such an industry.

### **B3. Economic interest test (EIT)**

12. As we are recommending revocation of the application of the countervailing amount under regulation 100B of the Regulations, we are not required to conduct an EIT.

### **B4. Recommendation to the Secretary of State**

13. In accordance with regulation 100(1) of the Regulations, the TRA must make a recommendation following a transition review, to vary or revoke the application of the countervailing amount to the goods subject to review.
14. As we have found that injury to the UK industry would not continue or recur if the measure were no longer applied, our recommendation is to revoke the application of the countervailing amount applicable to the goods subject to review, pursuant to regulations 100(1), 100(2)(a)(ii), and 100B of the Regulations. In accordance with regulation 100B(2), the TRA recommends that the measure be revoked with effect from 26 June 2025 – that is, the date that the measure would have expired had no transition review been initiated.

## Section C: Background

### C1. Initiation of the transition review

15. The UK chose to maintain certain trade remedy measures once outside the EU's common external tariff. The Department for International Trade (now the Department for Business and Trade (DBT)) identified which measures were of interest to the UK following a call for evidence.
16. For each of these measures, the former Secretary of State for International Trade (currently the Secretary of State for Business and Trade) published a Notice of Determination, under regulation 96(1) of the Regulations, setting out the decision to transition the corresponding EU trade remedies measure, and a Taxation Notice, on replacement of EU trade duty. We conduct transition reviews to determine if these measures should be varied or revoked in the UK.
17. On 31 December 2020, the Secretary of State published [Notice of Determination 2020/37](#) regarding the countervailing duty on GFR originating in Egypt, and [Taxation Notice 2020/37](#) (as subsequently varied by [Trade Remedies Notice 2024/02](#)) gave effect to the transition of this EU duty.
18. The current countervailing duty rate applicable to the goods subject to review is shown in Table 1. Under regulation 97C of the Regulations, this measure will continue to apply until the Secretary of State publishes a notice accepting or rejecting a TRA recommendation to vary or revoke the application of the countervailing amount following the conclusion of this transition review.

*Table 1: Current duty amounts*

Overseas Exporter	Duty Amount	Additional TAP Code
Jushi Egypt for Fiberglass Industry S.A.E	13.1%	C540
All other overseas exporters (residual rate)	13.1%	C999

19. The TRA initiated this transition review, and published the [NoI](#), on 18 March 2025.

### C2. Participation in the review

20. The TRA invited interested parties and contributors to register in order to participate in the review.
21. Table 2 shows the interested parties and contributors which registered to the review, along with a summary of information received. Non-confidential versions of all information received can be accessed on the [public file](#).

Table 2: Summary of information received from interested parties and contributors

Interested party / contributor	Classification	Information received
Electric Glass Fiber UK Ltd (EGF)	Domestic producer	<a href="#">Pre-sampling questionnaire</a>
GRP Solutions Ltd	Importer	<a href="#">Pre-sampling questionnaire</a> & <a href="#">Importer questionnaire</a>
Brett Martin Daylight Systems Ltd	Contributor	<a href="#">Pre-sampling questionnaire</a>
Trade Remedies Sector, Govt of the Arab Republic of Egypt (GOE)	Foreign Government	<a href="#">Pre-sampling questionnaire</a> & <a href="#">Government questionnaire</a>
Composites UK	Contributor	<a href="#">Pre-sampling questionnaire</a>

### C3. Use of information and verification of data

22. Within this transition review, we have used submitted data within our analysis. We have compared submitted evidence against the totality of relevant information available to us – whether submitted to us, taken from TRA data subscriptions, or publicly available from governmental, industry, and other sources.
23. As a result of the TRA’s conclusion in respect of the existence of a UK industry in the like goods (as set out in [Section D: The goods and UK industry](#)), we assessed that the data submitted by interested parties would not materially impact our findings or our recommendation. As such, we did not consider it necessary to undertake any verification activity to provide additional assurance on its completeness, accuracy, and relevance.

### C4. Publication of the SEF

24. On 27 October 2025, the TRA published the [Statement of Essential Facts \(SEF\)](#) for this transition review to the public file. The SEF was published in accordance with regulation 62 of the Regulations.
25. Following publication of the SEF, we invited all registered parties to make submissions in response. Pursuant to regulation 62(2) of the Regulations, we set the deadline for submission of comments of 10 November 2025.
26. We received no comments in response to the SEF by this date.

## Section D: The goods and UK industry

### D1. Goods subject to review

27. The goods subject to review are identified as continuous filament glass fibre products (GFR) originating in Egypt and exported to the UK, described in the [NoI](#) as:

- chopped glass fibre strands, of a length of not more than 50mm; and
- glass fibre rovings, excluding glass fibre rovings which are impregnated and coated and have a loss on ignition of more than 3% (as determined by the ISO Standard 1887).

28. The goods subject to review are categorised under the following commodity codes:

- 70 19 11 00 00
- 70 19 12 00 22
- 70 19 12 00 26
- 70 19 12 00 25
- 70 19 12 00 39

### D2. Like goods

29. In accordance with paragraph 7 of Schedule 4 to the Taxation (Cross-Border) Trade Act 2018 (the Act), the TRA refers to 'like goods' as those which are like the goods subject to review in all respects or, if there are no such goods, goods that have characteristics which closely resemble them.

30. One party, EGF, registered to the review as a domestic producer. EGF's pre-sampling questionnaire response stated that it produced GFR during the PoI.<sup>2</sup> Our research and consultation with industry indicated that EGF was the sole UK producer of GFR.

31. EGF's parent company, Nippon Electric Glass Co. Ltd (NEG), announced EGF's closure on 18 June 2025, following a strategic review of operations.<sup>3</sup> We were able to confirm that EGF's production of the like goods ceased in June 2025, with no intent to restart.

32. The TRA subsequently took steps to identify any other UK production of like goods. On 10 July 2025, we published a note to the public file which asked for any evidence or comment regarding UK production of GFR to be submitted by 31 July 2025.<sup>4</sup> We received no responses, and did not otherwise identify any evidence of UK production of like goods. We set out this conclusion in a further note to the public file, published on 27 August 2025.<sup>5</sup>

33. We have found no evidence for current or planned production in the UK of goods which are like the goods subject to review. In the absence of such evidence, we have determined that there are no UK-produced like goods relevant to this transition review.

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<sup>2</sup> [EGF - pre-sampling questionnaire response](#), published to the TS0069 public file on 15 April 2025

<sup>3</sup> [NEG Press Release](#), published to NEG's website on 18 June 2025 [accessed 29 August 2025]

<sup>4</sup> [Note to file - Presence of the UK industry](#), published to the TS0069 public file on 10 July 2025

<sup>5</sup> [Note to file - Confirmed position on UK industry](#), published to the TS0069 public file on 27 August 2025

### **D3. UK industry in the like goods**

34. In accordance with paragraph 6(1) of Schedule 4 of the Act, the UK industry is defined as:

- a) all the producers in the UK of like goods, or
- b) those of them whose collective output of like goods constitutes a major proportion of the total production of those goods in the UK.

35. Pursuant to regulation 27(2) of the Regulations, as applicable to transition reviews (see regulation 99C of the Regulations), the TRA defines a UK industry in the like goods so that it can determine whether injury to that industry is likely to continue or recur (see regulation 99A(1)(b) of the Regulations and [Section F: Injury likelihood assessment](#) below). Regulation 30(3) of the Regulations (as applicable to transition reviews) clarifies that such assessment must be conducted only by reference to data which relates to the production of the like goods in the UK which are not exported (i.e. those like goods which are destined for UK domestic consumption). Therefore, for the purpose of this review, a domestic producer of the like goods must be selling these like goods into the UK market in order to be considered part of the UK industry in the like goods.

36. As set out in [D2. Like goods](#), we have determined that there is no evidence of current or planned production of the like goods in the UK. On this basis, and in line with the definition of UK industry as set out in paragraphs 34 and 35, we have therefore concluded that presently, there is no UK industry in the like goods.

## Section E: Subsidy likelihood assessment

### E1. Introduction

37. In accordance with regulation 99A(1)(a) of the Regulations, we have assessed the likelihood that the importation of the subsidised goods subject to review would continue or recur if the countervailing amount were no longer applied.

38. This assessment has considered the following factors:

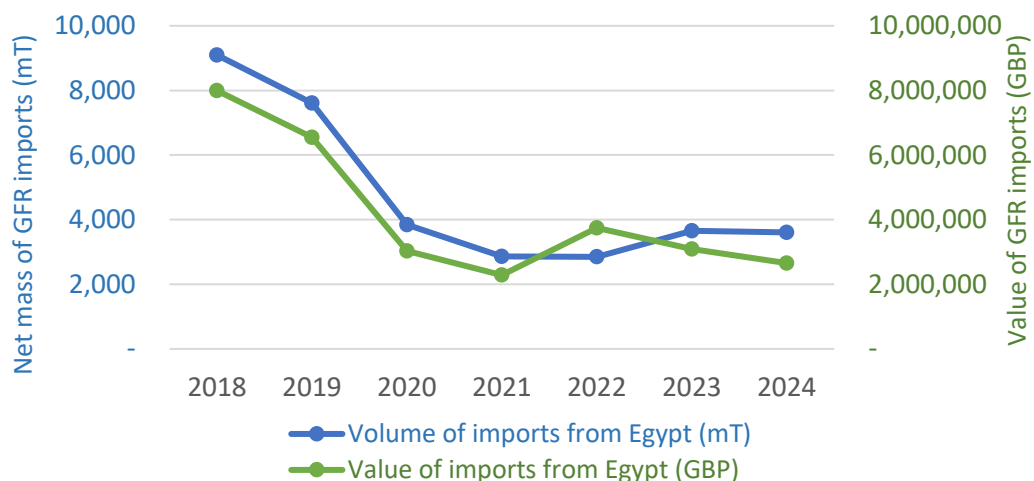
- Continuation of imports whilst the measure has been in place;
- Continued existence of programmes in the exporting country;
- Whether exporters have previously or habitually circumvented measures;
- Exports to third countries; and
- Attractiveness of the UK market to exporters.

The following sections summarise our findings in respect of each of these factors.

### E2. Continuation of imports

39. To assess whether imports of the goods subject to review into the UK have continued while the measure has been in place, we considered the period from 2018 to 2024. We considered the additional three years before the injury period to enable a comparison with import figures before the implementation of the EU measure. Figure 1 shows the annual import volume and value of the goods subject to review over this period.

Figure 1: Imports of GFR into the UK from Egypt (2018–2024)



Source: HMRC OTS data for imports of commodities 7019 11 00 and 7019 12 00 from 2018–2024.<sup>6</sup>

40. Annual imports of the goods subject to review declined from 2018 to 2021. The largest decrease, from 2019 to 2020, coincides with the imposition of the EU countervailing measure in 2020. Imports remained comparatively stable from 2021 onwards.

41. Table 3 shows the UK's imports of GFR from Egypt, compared against worldwide imports, between 2018 and the Pol (2024).

<sup>6</sup> [HMRC](#) OTS data for commodities 7019 11 00 and 7019 12 00 [downloaded 1 August 2025]

Table 3: UK imports of the goods subject to review and worldwide imports of GFR

	Import volume (mT)			Import value (GBP)		
	Egypt	All imports	Egypt %	Egypt	All imports	Egypt %
2018	9,096.30	49,566.74	18.4	7,994,891	51,011,631	15.7
2019	7,611.35	47,786.81	15.9	6,550,698	49,050,404	13.4
2020	3,842.89	39,630.17	9.7	3,030,991	40,215,640	7.5
2021	2,866.59	36,273.42	7.9	2,284,790	43,009,641	5.3
2022	2,849.21	62,746.86	4.5	3,750,160	58,536,877	6.4
2023	3,661.04	32,354.11	11.3	3,092,094	44,375,724	7.0
2024	3,608.60	29,092.95	12.4	2,657,333	35,245,052	7.5

Source: HMRC OTS data (8-digit) for imports of commodities 7019 11 00 and 7019 12 00; 'Egypt %' specifies the percentage of all imports into the UK for each year which originated in Egypt.

42. As imports of the goods subject to review decreased from 2019 to 2020, Egypt's share of the UK's annual GFR imports decreased correspondingly. This supports the interpretation that the decline in imports from Egypt in 2020 was at least in part driven by the EU's countervailing measure which came into effect in this year.
43. Overall, we found that imports of the goods subject to review have continued throughout the injury period, but have remained at a reduced level since the EU's countervailing measure was imposed in 2020. This may indicate the levels of imports have been reduced as an effect of the application of the measure, and revocation of the measure may therefore result in an increased level of imports of the goods subject to review.

### E3. Continued existence of programmes in the exporting country

44. We assessed the likelihood of the continued existence (or replacement in kind) of each of the programmes which contributed to the overall subsidy margin in the transitioned measure. To conclude on this factor, we used the following information to assess the evidential basis for each programme's continuation:
- Publications by the European Commission (EC) regarding AS657 <sup>7</sup>
  - The GOE's questionnaire response and appendices <sup>8</sup>
  - Information published on the official 'SC-Zone' website <sup>9,10</sup>
  - Egyptian Accounting Standards (EAS) and decrees issuing temporary amendments to the EAS <sup>11,12</sup>
  - Egypt's customs duties and tariff rates <sup>13</sup>
  - Annual reports and other publications by Jushi Egypt's parent/group companies <sup>14,15</sup>

<sup>7</sup> [EC Investigation AS657](#) - Provisional & definitive measures publications [accessed 29 August 2025]

<sup>8</sup> GOE Questionnaire Response and appendices (published to the [TS0069 public file](#) on 13 August 2025)

<sup>9</sup> The 'SC-Zone' refers to the 'Suez Economic and Trade Cooperation Zone', a special economic zone in the Suez Canal region of Egypt, where exporter Jushi Egypt is located: [Jushi Group website](#)

<sup>10</sup> [SCZONE Website](#) [accessed 29 August 2025]

<sup>11</sup> [EAS No 13 2006](#) [accessed and machine translated by the TRA 13 May 2025]

<sup>12</sup> [Ministry of Finance's Decision No 34 of 2024](#) [accessed and machine translated by the TRA 7 May 2025]

<sup>13</sup> [Egypt Customs Authority: Tariff Search](#) [accessed 2 September 2025]

<sup>14</sup> Jushi China's Annual Reports for the injury period, and other announcements, published on the [Shanghai Stock Exchange](#) under no. 600176 [accessed and machine translated by the TRA 20 June–1 September 2025]

<sup>15</sup> News and announcements on [Jushi Group's website](#) [accessed 3 September 2025]

- Government economic policies <sup>16,17</sup>
- Other secondary sources: news reporting and professional tax publications <sup>18, 19</sup>

45. Questions regarding the programmes under review were included in the Exporter and Foreign Government questionnaires. The TRA did not receive exporter engagement; we have therefore relied on facts available, as summarised at paragraph 44, to supplement information submitted by the GOE.

46. We concluded that there is evidence to support a finding on the continued existence, or replacement in kind, of most of the programmes from the transitioned measure. Given a lack of evidence of any changes in eligibility criteria for these, we also consider the exporter is likely to continue to benefit from said programmes.

#### **E4. Previous or habitual circumvention of trade remedy measures**

47. Where exporters have habitually circumvented trade remedies measures or absorbed their effects and continued to sell at the same prices, this may indicate an increased likelihood that exports of subsidised goods would recur or increase if the measure was revoked.

48. To identify whether any other countries have measures in place, we searched the WTO's [Trade Remedies Data Portal](#). The only other countervailing measure listed is the EU measure on GFR from Egypt.<sup>20</sup> The EC also has an ongoing anti-dumping investigation on these like goods.<sup>21</sup> Türkiye is the only country with a current anti-dumping measure on GFR from Egypt; this was imposed on 19 July 2025 (after the end of the PoI).<sup>22</sup>

49. The TRA did not identify any findings of circumvention of measures on Egyptian GFR. However, in 2022, the EC determined that measures on a derivative product, Glass Fibre Fabrics (GFF), from Egypt were being circumvented via Türkiye. The EC found that exporter Jushi Egypt was exporting GFR to an associated company in Türkiye, with the Turkish company further processing the GFR to produce GFF which it then exported to the EU.<sup>23</sup> In 2022, the EU extended the application of a countervailing duty of 30.7% to imports of GFF from Türkiye.

50. Given the interconnected nature of GFF and GFR, and the involvement of the sole exporter of the goods subject to review, we consider this previous circumvention of countervailing measures on related goods to be relevant. It demonstrates a precedent for this type of activity, and may indicate greater likelihood of increased imports of subsidised goods to the UK if the measure were revoked.

<sup>16</sup> ['Made in China 2025'](#), translated by CSET, published 8 March 2022 [accessed 2 September 2025]

<sup>17</sup> ['PRC 14th Five-Year Plan'](#), translated by CSET, published 13 May 2021 [accessed 2 September 2025]

<sup>18</sup> [PWC's tax guide to Egypt](#), last updated 13 August 2025 [accessed 28 August 2025]

<sup>19</sup> Publications by the [CDB](#), [TEDA-SUEZ](#), and [CNBM](#) [accessed 3 September 2025]

<sup>20</sup> *The EC initiated an expiry review of this measure on 23 June 2025, and it is currently in progress: 'Expiry Review R836'*, European Commission, published 23 June 2025 [accessed 28 August 2025]

<sup>21</sup> ['Anti-dumping investigation AD728'](#), European Commission [accessed 21 August 2025]

<sup>22</sup> ['Final Notification Report'](#), Türkiye General Directorate [accessed and machine translated 27 August 2025]

<sup>23</sup> ['Circumvention Review R756'](#), European Commission, published 6 September 2022 [accessed 27 August 2025]

## E5. Exports of the like goods to third countries

51. If overseas exporters are currently exporting subsidised goods to third countries, and/or are subject to countervailing measures elsewhere, this may indicate that increases in subsidised imports could occur if the measure was revoked.
52. We have considered Egypt's exports of GFR to third countries. The volume and value of Egypt's GFR exports to its top export destinations during the Pol are shown in Table 4.

Table 4: Egypt's top export destinations for GFR during the Pol (2024)

Ranking (volume)	Country	Volume (mT)	Value (GBP)	Ranking (value)
1	Türkiye	72,645.17	38,358,163	1
2	Germany	40,369.84	26,363,844	2
3	Netherlands	23,106.36	14,093,560	4
4	United States	19,948.35	16,281,506	3
5	Spain	18,135.64	10,258,689	5
15	United Kingdom	3,608.60	2,657,333	14

Source(s): GTT, All reporting countries HS6 import data from Egypt (Codes: 7019 11 and 7019 12).<sup>24</sup>

53. During the Pol, Egypt's GFR export volume to the UK was 4.9% of its export volume to the top destination (Türkiye), and less than 2% of its worldwide exports of GFR.
54. Three countries from Table 4 are EU members, for which the EU countervailing duty applied during the Pol. These countries remained in the top export destinations despite this duty. Türkiye's anti-dumping duty was not applicable until after the end of the Pol (see [E4. Previous or habitual circumvention of trade remedy measures](#)).
55. We have found that the like goods from Egypt are currently being exported to third countries, including those with countervailing measures in place on those goods. The recent anti-dumping measure imposed by Egypt's top GFR export destination (Türkiye) may result in a change in exporting behaviours, which may be more likely to include an increase in exports to the UK if the countervailing measure was no longer applied to the goods subject to review.

## E6. Attractiveness of the UK market

56. If the UK is considered an attractive export destination, it may indicate greater likelihood of increased imports of the goods subject to review if the measure was revoked.
57. We considered a range of economic factors relevant to the GFR industry and whether these indicate the UK is an attractive destination for exporters. The key factors informing our overall assessment of the attractiveness of the UK market are summarised below:

<sup>24</sup> Data sourced from [Global Trade Tracker \(GTT\)](#) 8 August 2025, using the 'mirrored reporting' function.

- UK market size and growth: During the injury period, the majority of the UK's GFR demand was fulfilled by imports.<sup>25,26</sup> With no evidence of current domestic GFR production (see [Section D: The goods and UK industry](#)), we assess there to be reasonable demand for GFR in the UK which cannot be met by domestic production. This may incentivise imports.
- Pricing: The average import price of GFR from Egypt was lower than the average worldwide import price throughout the injury period.<sup>27</sup> It is therefore likely that exporters from Egypt would be able to compete in the UK market if the measure was revoked.
- Intensity of the competition: With no domestic production, the only competition will be exporters from other countries. The average worldwide import price appears sufficiently high for the UK to remain attractive to exporters who can offer lower prices.
- Other factors – the UK's geographic proximity to the EU: Several EU countries were amongst Egypt's top export destinations for GFR during the PoI. If the countervailing measure in the UK were revoked, while the EU measure remained in application, this may further increase the attractiveness of the UK market.

58. Overall, we assess that the UK appears to be a reasonably attractive market to exporters, which does not have particularly intense competition or any barriers to market entry.

## E7. Conclusion

59. In accordance with the Regulations, the TRA has considered the likelihood of subsidised imports of the goods subject to review continuing or recurring by conducting a holistic assessment of all the above relevant factors. We found that:

- Imports of the goods subject to review continued (at reduced levels) throughout the injury period.
- Many of the subsidy programmes identified by the EC continue to exist, and it is likely that the exporter continues to benefit from them.
- There has been previous circumvention on related products from the same industry.
- Egypt exports GFR to many other countries, and its biggest export destination has recently imposed an anti-dumping measure on GFR.
- The UK appears to be an attractive market based on price, demand, and competition.

60. Having considered all relevant factors assessed, we have determined that, on the balance of probabilities (more likely than not), subsidised imports of the goods subject to review would be likely to continue in increased volumes if the countervailing measure was no longer applied to those goods.

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<sup>25</sup> HMRC OTS data (8-digit), as previously referenced.

<sup>26</sup> [EGF UK Annual Reports](#) for the injury period, published on Companies House [accessed 8 September 2025]

<sup>27</sup> HMRC OTS data (8-digit), as previously referenced.

## **Section F: Injury likelihood assessment**

61. In accordance with regulation 99A(1)(b) of the Regulations, we have considered whether injury to a UK industry in the like goods would be likely to continue or recur if the countervailing amount were no longer applied to imports of the goods subject to review from Egypt.
62. During this review, and as set out in [D2. Like goods](#) and [D3. UK industry](#), following the closure of EGF, we have identified no evidence of current or planned UK production of goods which are like the goods subject to review. We have therefore assessed there to be no UK industry in the like goods.
63. In assessing injury to a UK industry as per regulation 99A(1)(b) of the Regulations, we conclude that, since we have assessed that there is no such UK industry in the like goods, then there is no likelihood of injury to that industry continuing or recurring if the measure on the goods subject to review were to be revoked.

## **Section G: Economic interest test**

64. The aim of the Economic Interest Test (EIT) is to determine whether making a recommendation to vary the measure and apply a countervailing amount on the goods subject to review imported from Egypt is in the economic interest of the UK.
65. The TRA has determined that, in the absence of a UK industry, there can be no likelihood of injury continuing or recurring. As a result, our recommendation is to revoke the application of the countervailing duty under regulation 100B of the Regulations.
66. Where the TRA makes such a recommendation to revoke, we are not required to conduct an EIT.

## **Section H: Findings and final recommendation**

### **H1. Findings**

67. The TRA has found that it is likely, on the balance of probabilities, that subsidised imports of GFR originating in Egypt would continue in increased quantities if the countervailing amount was no longer applied to those goods.
68. In the absence of evidence of a UK industry in the like goods, we have determined that there is no likelihood of injury continuing or recurring should the countervailing amount no longer be applied to the goods subject to review.

### **H2. Final recommendation**

69. The TRA's recommendation to the Secretary of State is to revoke the application of the countervailing amount to the goods subject to review originating in Egypt.
70. In accordance with regulation 100B(2), the TRA recommends that the measure be revoked with effect from the appropriate date,<sup>28</sup> that is, 26 June 2025, as this would have been the date that the measure would have expired had no transition review been initiated.

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<sup>28</sup> See also regulations 94(1)(b)(ii) and 97C(1)(a) and (2) of the Regulations. See also [Taxation notice 2020/37](#).