



Trade Remedies Authority

Transition Review No. TS0060 –
Polyethylene Terephthalate (PET)

Countervailing measures on Polyethylene Terephthalate (PET) originating in India

Note to public file

19th December 2024

Business survey responses

The TRA conducted an online survey of consumers, and upstream and downstream businesses to help us to understand the economic impacts of the tariffs paid on Polyethylene Terephthalate (PET) originating in India. The survey was open from 2 September 2024 to 1 October 2024. This document sets out the evidence received from this survey.

Number of responses and verification

We received 9 responses. We reviewed these and removed:

- Responses where only the first question had been completed (*Are you a business or a consumer?*)
- Responses where the business identity could not be verified
- Responses from ineligible businesses (e.g. producers of product aluminium foil in small rolls)
- Responses from outside of the UK
- Duplicate responses

Once these responses were removed, there were 5 business responses.

Business responses (5 responses)

After checking and removing responses as set out above, 5 business responses remained. We have not included the names or personal information of any of the businesses who responded to the survey.

Q1 How did you find out about this survey?

Social Media	
Email Campaign	1
TRA Website	
News Story	
Other (please specify)	4

Q2 How does Polyethylene Terephthalate (PET) relate to your business?

We sell to UK producers of PET (Upstream business)	1
We are a producer of PET	
We buy PET to sell or to manufacture goods (Downstream business)	2
We sell products made from PET or containing PET parts e.g. packaging (Downstream business other)	2
None of above or unsure	

Upstream business (1 responses)

The 1 respondent who identified as an upstream business in the survey submitted the following answers:

Q5 Please describe what your business does.

The respondent identified as being in the distribution sector.

Q6 To your knowledge, are any products sold by your company used in the manufacture of Polyethylene Terephthalate (PET)?

Yes	
No	1

Downstream business (2 responses)

The 4 respondents who identified as downstream businesses in the survey submitted the following answers:

Q3 Do you buy or use Polyethylene Terephthalate (PET) with a viscosity of 78ml/g or higher according to ISO Standard 1628-5?

This question was only applicable to respondents who identified in Q2 as being a Downstream business.

Yes	2
No	

Q18 Please describe what your business does.

The 2 businesses who identified as being downstream businesses manufactured PET preforms and bottles and plastic foodservice packaging.

Q19 Does your company buy Polyethylene Terephthalate (PET) to manufacture goods or to sell?

Sell PET	
Use PET to manufacture goods	2

Q20 Can you please indicate the type of Polyethylene Terephthalate (PET) processing your company does?

Conversion	1
Extrusion	
Both conversion and extrusion	1
Other (please specify)	

Q21 What types of industries does your company sell Polyethylene Terephthalate (PET) or your products made from PET to?

Automotive	
Packaging (Please specify type of industry)	2
Textiles	
Electrical and electronics	
Food and drink	
Other	

The respondents who identified as being in the Packaging industry specified that they manufacture bottles and containers for any application where a bottle or threaded container is used including food, personal care and household cleaning.

Q22 What grade of Polyethylene Terephthalate (PET) do you use or sell?

Bottle grade	2
Fiber-grade PET	
Film grade	
Sheet grade	
Textile grade	

Other (please specify)	
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Q23 Does your company import Polyethylene Terephthalate (PET)?

Yes, we import	1
No, we buy from UK producers	
Both, import and buy from UK producers	1

Q24 Please name your supplier(s) and their geographical location (i.e. Company name, Country, region)

The business names and countries were provided via the survey but have not been disclosed because the information in their responses could be commercially sensitive or could reveal their business identities.

Q25 Roughly, how much Polyethylene Terephthalate (PET) did you import (in kg) in the last financial year?

For Virgin PET and also for rPET, the amount imported averaged over 400 tonnes.

Q26 Roughly, how much Polyethylene Terephthalate (PET) did you buy from UK producers/retailers (in kg) in the last financial year?

For Virgin PET, the amount bought from UK producers/retailers averaged over 50 tonnes and for rPET the average amount imported was over 10 tonnes.

Q27 Does your company use a blend of virgin PET (V-PET) with recycled PET (rPET) in manufacturing your products?

Yes	2
No	

Q29 Roughly what percentage of PET you use is recycled PET (rPET)?

The percentage of rPET used ranged from 30% to 50%.

Q30 Does your company import/buy a blend of rPET(recycled PET) and virgin PET (V-PET) based on your specifications?

Yes, we import or buy a blend of V-PET and rPET based on our specifications	
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No, we mix the resins ourselves	2
Both	

Q31 Are there significant differences in the quality of products manufactured using rPET (either mixing with virgin PET or 100% rPET) versus using 100% virgin PET?

Yes (Please explain)	2
No	

Respondents who answered yes explained that there are enormous differences in contamination, intrinsic viscosity and colour compared to virgin PET. They said the material blend is slightly more brittle in application.

Q32 Please tell us how important the following factors are in making your decision to manufacture using recycled PET (rPET)?

	Very Important	Important	Moderately important	Only slightly important	Not at all important
Price	1	1			
Plastic packaging tax	2				
Environmental / ethical considerations	1	1			
Quality of final product	1	1			

Q33 Please provide your company's approximate total sales revenue (in pound sterling) from the last financial year.

The sales revenue averaged £110m.

Q34 Approximately what percentage of your total sales revenue in the last financial year were from sales of aluminium foil in rolls?

Less than 1%	
Over 10% up to 20%	1
Over 20% up to 30%	
Greater than 30%	1
Unsure	

Q35 Who do you sell to? (Other businesses/final consumers, etc.)

Responses to this question included:

- All UK drinks brands, retailers, packer fillers, along with most household cleaning brands

- Major high street foodservice operators including coffee shops, fast food restaurants, events venues and catering companies.

Q36 *Approximately how many UK employees does your company have?*

The responses ranged from 200 to 400 employees.

Q37 *If prices of Polyethylene terephthalate (PET) were to increase, how would you respond?*

Reduce purchases of PET	1
Purchase same quantity of PET	1
Reduce purchase of other goods to maintain quantity of PET	
Purchase cheaper alternative (please specify)	1

The number of responses for this question do not correspond to the total number of respondents (2) as one respondent selected two options.

Q38 *Are your products ever used because of a protected characteristic? Protected characteristics are; age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.*

Yes, please specify the relevant protected characteristic(s)	
No	1
Unsure	1

Q39 *Please tell us how the existing tariff on Polyethylene Terephthalate (PET) from India affects your company and industry? What might change if the tariff were to be removed?*

There were a wide range of responses to this question. One respondent said that there would be minimal impact on supply as they source PET from EU and Turkey. One common theme across all responses was the removal of the tariff would enable UK manufacturers to source from India as a viable alternative to supplies from other countries where there are no tariffs. This would enable them to take benefit of lower prices, if available.

One respondent said that the tariff has a direct impact on their ability to compete with low-cost imports, particularly from Asian based producers. This means that their ability to manufacture and sell more volume in the UK is constrained.

Q40 *In your experience are there any notable differences in Polyethylene Terephthalate (PET) from India compared to those from other countries including the UK (e.g. in terms of price, quality or characteristics)? One respondent to this question said that there are no notable differences in virgin Polyethylene Terephthalate (PET) from India compared to those from other countries including the UK.*

Another respondent said that they had no experience of differences in Polyethylene Terephthalate (PET) from India compared to those from other countries.

Q41 *Is there any other information you would like to provide to help us assess the effects of the tariff on Polyethylene Terephthalate (PET) from India on the overall economic interest of the UK?*

Concerns were raised by one respondent that tariffs could encourage converters in other countries to buy Indian resin, convert the product and then import the converted item, with no tariffs applied to the UK causing huge damage to their business.

Downstream business other (2 responses)

2 respondents replied to Q2 *How does Polyethylene Terephthalate (PET) relate to your business?* that they sell products made from PET or containing PET parts e.g. packaging.

Q4 *Do you know if the products that you sell containing PET have a viscosity of 78ml/g or higher, according to ISO Standard 1628-5?*

This question was only applicable to respondents who identified in Q2 as being a Downstream business other.

Yes	2
No	

Q42 *Please describe what your business does*

One of the respondents said their business made packaging containers. There was 1 non-response.

Q43 *What types of industry does your company belong to?*

Automotive	
Packaging (Please specify type of industry)	2
Textiles	
Electrical and electronics	
Food and drink	
Other	

The respondents specified that their businesses related to beverages, EE-Liquid and colour cosmetics.

Q44 *Does your company import products manufactured from Polyethylene Terephthalate (PET)?*

Yes, we import	
No, we buy from UK producers	1
Both, import and buy from UK producers	1

Q45 Please name your supplier(s) and their geographical location (i.e. Company name, Country, region)

The business names and countries were provided via the survey but have not been disclosed because the information in their responses could be commercially sensitive or could reveal their business identities.

Q46 Does your company buy/import products containing a blend of virgin PET (V-PET) with recycled PET (rPET)?

Yes	
No	2

Q47 Roughly what percentage of recycled PET (rPET), do the PET products you buy contain?

There were two non-responses to this question.

Q48 Are there significant differences in the quality of products manufactured using rPET (either mixed with virgin PET (V-PET) or 100% rPET) versus using 100% V-PET?

Yes (Please explain)	
No	

There were two non-responses to this question.

Q49 Please tell us how important each of the following factors are to you when buying PET products?

	Very Important	Important	Moderately important	Only slightly important	Not at all important
Price		1			
Plastic packaging tax		1			
Environmental / ethical considerations		1			
Quality of final product	1				

There was 1 non-response to this question.

Q50 Please provide your company's approximate total sales revenue (in pound sterling) from the last financial year.

The approximate total sales revenue for 1 respondent was provided via the survey but has not been disclosed because the information could reveal their business identity.

Q51 *Approximately what percentage of your total sales revenue in the last financial year were from sales of products made from Polyethylene Terephthalate (PET)?*

Less than 1%	
Over 1% up to 10%	
Over 10% up to 20%	
Greater than 20%	1
Unsure	

Q52 *Who do you sell to? (Other businesses, general public etc.)*

Other businesses

Q53 *Approximately how many UK employees does your company have?*

The approximate number of UK employees for 1 respondent was provided via the survey but has not been disclosed because the information could reveal their business identity.

Q54 *If prices of Polyethylene Terephthalate (PET) were to increase, how would you respond?*

Reduce purchases of PET products	
Purchase same quantity of PET products	
Reduce purchase of other goods to maintain quantity of PET products	
Purchase cheaper alternative (please specify)	1

There was 1 non-response to this question.

Q55 *Are your products ever used because of a protected characteristic? Protected characteristics are; age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.*

Yes, please specify the relevant protected characteristic(s)	
No	1
Unsure	

There was 1 non-response to this question.

Q56 *Please tell us how the existing tariff on Polyethylene Terephthalate (PET) from India affects your company and industry? What might change if the tariff were to be removed?*

Concerns were raised on recycled content in products imported from third countries. The recycled content is added on the products, but there is no method of testing imports.

Q57 *In your experience are there any notable differences in Polyethylene Terephthalate (PET) from India compared to those from other countries including the UK (e.g. in terms of price, quality or characteristics)?*

The respondent said they were unsure.

Q58 *Is there any other information you would like to provide to help us assess the effects of the tariff on Polyethylene Terephthalate (PET) from India on the overall economic interest of the UK?*

Concerns were raised about the difficulty to remain competitive on these imported goods as Plastic Packaging Tax (PPT) and new regulations such as Extended Producer Responsibility (EPR) are increasing the cost of manufacturing in the UK and these other countries do not hold up to the same rigorous standards.

Annex A: Survey questions

PET - Business Survey

Start of Block: Type of business

Q1 How did you find out about this survey?

Q2 How does Polyethylene Terephthalate (PET) relate to your business?

If Q2= Downstream business, GO TO Q3

Q3 Do you buy or use Polyethylene Terephthalate (PET) with a viscosity of 78ml/g or higher according to ISO Standard 1628-5?

If Q2= Downstream business other, GO TO Q4

Q4 Do you know if the products that you sell containing PET have a viscosity of 78ml/g or higher, according to ISO Standard 1628-5?

End of Block: Type of business

Start of Block: Business – Upstream

If Q2= Upstream

Q5 Please describe what your business does

Q6 To your knowledge, are any products sold by your company used in the manufacture of Polyethylene Terephthalate (PET)?

Q7 Please provide your company's approximate total sales revenue (in pound sterling) from the last financial year.

Q8 Roughly what percentage of your total sales from the last financial year were to companies which produce Polyethylene Terephthalate (PET)?

Q9 Approximately how many UK employees does your company have?

Q10 Please tell us how the existing tariff on Polyethylene Terephthalate (PET) from India affects your company and industry? What might change if the tariff were to be removed?

Q11 Is there any other information you would like to provide to help us assess the effects of the tariff on Polyethylene Terephthalate (PET) from India on the overall economic interest of the UK?

End of Block: Business - Upstream

Start of Block: Unsure, if you are downstream or upstream business.

If Q2 = Unsure

Q12 How does Polyethylene Terephthalate (PET) relate to your company?

Q13 Please describe what your business does (How does PET relate to your business)?

Q14 Do you recycle Polyethylene Terephthalate into pellets, flakes, sheet etc. with a viscosity of 78ml/g or higher?

Q15 Please tell us how the existing tariff on Polyethylene Terephthalate (PET) from India affects your company and industry? What might change if the tariff were to be removed?

Q16 In your experience are there any notable differences in Polyethylene Terephthalate (PET) from India compared to those from other countries including the UK (e.g. in terms of price, quality or characteristics)?

Q17 Is there any other information you would like to provide to help us assess the effects of the tariff on Polyethylene Terephthalate (PET) from India on the overall economic interest of the UK?

End of Block: Unsure, if you are downstream or upstream business.

Start of Block: Downstream business

If Q2= Downstream business

Q18 Please describe what your business does

Q19 Does your company buy Polyethylene Terephthalate (PET) to manufacture goods or to sell?

Q20 Can you please indicate the type of Polyethylene Terephthalate (PET) processing your company does?

Q21 What types of industries does your company sell Polyethylene Terephthalate (PET) or your products made from PET to?

Q22 What grade of Polyethylene Terephthalate (PET) do you use or sell?

Q23 Does your company import Polyethylene Terephthalate (PET)?

Q24 Please name your supplier(s) and their geographical location (i.e. Company name, Country, region)

Q25 Roughly, how much Polyethylene Terephthalate (PET) did you import (in kg) in the last financial year?

Q26 Roughly, how much Polyethylene Terephthalate (PET) did you buy from UK producers/retailers (in kg) in the last financial year?

Q27 Does your company use a blend of virgin PET (V-PET) with recycled PET (rPET) in manufacturing your products?

Q28 Does your company use only rPET (recycled PET) in product manufacture?

Q29 Roughly what percentage of PET you use is recycled PET (rPET)?

Q30 Does your company import/buy a blend of rPET(recycled PET) and virgin PET (V-PET) based on your specifications?

Q31 Are there significant differences in the quality of products manufactured using rPET (either mixing with virgin PET or 100% rPET) versus using 100% virgin PET?

Q32 Please tell us how important the following factors are in making your decision to manufacture using recycled PET (rPET)?

	Very Important	Important	Moderately important	Only slightly important	Not at all important
Price					
Plastic packaging tax					
Environmental / ethical considerations					
Quality of final product					

Q33 Please provide your company's approximate total sales revenue (in pound sterling) from the last financial year.

Q34 Approximately what percentage of your total sales revenue in the last financial year were from sales of products made from Polyethylene Terephthalate (PET)?

Q35 Who do you sell to? (Other businesses etc.)

Q36 Approximately how many UK employees does your company have?

Q37 If prices of Polyethylene terephthalate (PET) were to increase, how would you respond?

Q38 Are your products ever used because of a protected characteristic? Protected characteristics are; age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation?

Q39 Please tell us how the existing tariff on Polyethylene Terephthalate (PET) from India affects your company and industry? What might change if the tariff were to be removed?

Q40 In your experience are there any notable differences in Polyethylene Terephthalate (PET) from India compared to those from other countries including the UK (e.g. in terms of price, quality or characteristics)?

Q41 Is there any other information you would like to provide to help us assess the effects of the tariff on Polyethylene Terephthalate (PET) from India on the overall economic interest of the UK?

End of Block: Downstream business

Start of Block: Downstream retailers

Q42 Please describe what your business does

Q43 What types of industry does your company belong to?

Q44 Does your company import products manufactured from Polyethylene Terephthalate (PET)?

Q45 Please name your supplier(s) and their geographical location (i.e. Company name, Country, region)

Q46 Does your company buy/import products containing a blend of virgin PET (V-PET) with recycled PET (rPET)?

Q47 Roughly what percentage of recycled PET (rPET), do the PET products you buy contain?

Q48 Are there significant differences in the quality of products manufactured using rPET (either mixed with virgin PET (V-PET) or 100% rPET) versus using 100% V-PET?

Q49 Please tell us how important each of the following factors are to you when buying PET products?

	Very Important	Important	Moderately important	Only slightly important	Not at all important
Price					
Plastic packaging tax					
Environmental / ethical considerations					
Quality of final product					

Q50 Please provide your company's approximate total sales revenue (in pound sterling) from the last financial year.

Q51 Approximately what percentage of your total sales revenue in the last financial year were from sales of products made from Polyethylene Terephthalate (PET) ?

Q52 Who do you sell to? (Other businesses, general public etc.)

Q53 Approximately how many UK employees does your company have?

Q54 If prices of Polyethylene Terephthalate (PET) were to increase, how would you respond?

Q55 Are your products ever used because of a protected characteristic? Protected characteristics are; age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation?

Q56 Please tell us how the existing tariff on Polyethylene Terephthalate (PET) from India affects your company and industry? What might change if the tariff were to be removed?

Q57 In your experience are there any notable differences in Polyethylene Terephthalate (PET) from India compared to those from other countries including the UK (e.g. in terms of price, quality or characteristics)?

Q58 Is there any other information you would like to provide to help us assess the effects of the tariff on Polyethylene Terephthalate (PET) from India on the overall economic interest of the UK?