



17 April 2026

NON-CONFIDENTIAL VERSION

**BEFORE THE
TRADE REMDIES AUTHORITY**

In the matter of Anti-dumping Investigation concerning
Glass containers originating in the
People's Republic of China (PRC)

No. AD0087

Comments on the Proposed sample

On behalf of SGD Asia Pacific

I. Introduction

- [1] On 05 March 2026, the Trade Remedies Authority (TRA) makes a Notice under paragraph 9(5) of Schedule 4 to the Taxation (Cross-border Trade) Act 2018 (the Act) to initiate an anti-dumping investigation concerning glass containers originating in the People's Republic of China.
- [2] SGD Asia Pacific is a Chinese exporting producer who had exports of glass bottles/jars for cosmetics to the UK during the investigation period. Its UK customer is one of the biggest cosmetic companies in the world. On 20 March 2026, SGD Asia Pacific submitted its reply to the Registration Form for Interested Parties and Contributors, formally requesting to be selected as a sampling exporter.
- [3] On 10 April 2026, TRA published the Notification of proposed sample, and invited the parties to comment on this proposed sample by the end of 17 April 2026.
- [4] As mandated by SGD Asia Pacific, we hereby submit the comments on the proposed sample as follows and respectfully request to be included into the samples.

II. SGD Asia Pacific should be included in the sample

1. The information provided by SGD Asia Pacific is potentially significant

- [5] SGD Asia Pacific refers to the UK excavators case (AD0047 and AS0046), in which the TRA added Caterpillar Group and Finning to the existing sample of PRC exporters. The TRA accepted their information on the grounds that **such information was potentially significant** to the Final Determination.
- [6] Compared to other Chinese exporters, SGD Asia Pacific produces and exports only glass bottles/jars for cosmetics to UK. The glass bottles/jars for cosmetics are different from other glass products in terms of production process, production costs, sales prices and usages:

- 1) The production of glass bottles/jars for cosmetics involves more complex processing techniques, [redacted – commercially sensitive information]. These additional production processes lead to higher production costs.
- 2) Due to the higher production costs as well as [redacted – commercially sensitive information], the sales price of glass bottles/jars for cosmetics is normally higher than other products.
- 3) Unlike pharmaceutical bottles and beverage bottles, glass bottles/jars for cosmetics are designed for specific purposes and usages.

[7] Unlike the two currently proposed sampled exporters, SGD Asia Pacific exports only glass bottles/jars for cosmetics to the United Kingdom with representative export volume. Including SGD Asia Pacific in the sample is potentially important for the TRA to obtain a complete and accurate understanding of different product categories in the UK market.

2. The inclusion of SGD Asia Pacific into the sample would not impede the progress of an investigation

[8] As indicated in the reply to the Registration Form for Interested Parties and Contributors, SGD Asia Pacific involves only one exporting producer in its sales chain to the United Kingdom and sells exclusively glass bottles/jars for cosmetics.

[9] Therefore, including SGD Asia Pacific in the sample would not impose an additional burden on the TRA, nor would it unduly delay the investigation process.

3. Inclusion of SGD Asia Pacific will enhance the fairness and impartiality of the investigation.

[10] The scope of the goods concerned in this investigation includes multiple categories, such as beverage bottles, pharmaceutical bottles, and cosmetic bottles. Different

types of glass containers involve distinct production processes, costs, and selling prices.

[11] In the WTO panel report in China - Definitive Anti-Dumping Duties on X-Ray Security Inspection Equipment from the European Union, the panel held that

“In particular, when comparing the price of a basket of goods over time, it is necessary to ensure price comparability by considering, and if necessary taking into account, any changes in the proportion of the product types making up the basket each year. Without ensuring comparability in this context, it is possible that an observed decline in the average unit prices may actually be the result of a change in the product mix, for example due to an increased proportion of lower priced domestic products being sold in a particular year, rather than due to a genuine change in domestic prices”

[12] Based on the above, when analyzing dumping and injury, the TRA should conduct a product-type-specific analysis by differentiating between these product categories.

[13] This requires the TRA to obtain sufficient and representative cost and sales data for each product type. Including SGD Asia Pacific will enable the TRA to supplement the information already available from the currently proposed sampled companies with comprehensive data on cosmetic bottles.

[14] This will allow the TRA to conduct a category-specific analysis for this product type, thereby ensuring the fairness and impartiality of the investigation.

III. Requests

4. SGD Asia Pacific hereby presents these Comments to express its comments on the proposed sample and respectfully requests the TRA to include it into the samples on the ground that:

- 1) The information provided by SGD Asia Pacific is potentially significant to the investigation;
- 2) The inclusion of SGD Asia Pacific into the sample would not impede the progress of an investigation;

- 3) Inclusion of SGD Asia Pacific will enhance the fairness and impartiality of the investigation.

Submitted on behalf of SGD Asia Pacific

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