

Case AS0088

Anti-Subsidy investigation into Glass Containers originating in the Republic of Türkiye

Submission in Response to Notification of Sampling Approach

From: AEGG Limited

17 April 2026

1. Baker & McKenzie LLP ("Baker McKenzie") represents AEGG Limited ("AEGG") in connection with Case AS0088, the UK Anti-Subsidy investigation into Glass Containers originating in the Republic of Türkiye.
2. On 10 April 2026 the Trade Remedies Authority ("TRA") published its notification of proposed sample in respect of Case AS0088, including AEGG as part of the importer sampling.
3. AEGG welcomes the TRA's decision to include it within importer sampling and we confirm that AEGG is happy to participate on this basis.
4. In particular, AEGG considers it important to be included within scope of the sampling as:
 - it was the largest UK importer of within scope products during the POI; and
 - AEGG operates on a full-service business model, meaning that AEGG works with its customers to design, manufacture and supply glass containers. This is a one-of-its kind business model in the UK glass industry which is unique to AEGG.
 - As part of its business operations, AEGG bears the cost of technical design of the products and marketing, it also commissions the manufacture of products from Turkey and then co-ordinates the supply of the products from Turkey to the UK via its own transport fleet. AEGG is therefore an efficient and streamlined business, commissioning bespoke glass containers from Turkey, as opposed to purchasing off the shelf products, and effectively minimising logistic costs.
 - Accordingly, AEGG can offer the TRA a perspective of the UK glass container market, different to all others in the UK market. Particularly, does have concerns that the Applicant has submitted this case as an attack on its operating model, seeking to penalise AEGG for its investment in its business structure and passing the benefits of its cost-effective and novel service to customers.
5. Separately, in reference to the companies proposed to be sampled as **UK producers**, we would suggest that **Encirc** be added to (or replace Beatson on) this list. This is the most similar UK producer to Turkish producers in respect of size of machines, modernisation, efficiency and cost structure and would thus be important to consider in order to assess a fair representation of the production market.