Trade Remedies Authority

Trade Remedies Authority
Safeguard Investigation:

Application Form

When you have completed this form, indicate the **confidentiality** of this document by placing an X in the relevant box below:

☐ Confidential
X Non-Confidential – will be made publicly available

Please note that you will have to provide **two copies of your response** – a **Confidential** and a **Non-Confidential version.** Both copies should be returned to the TRA using the Trade Remedies Service (www.trade-remedies.service.gov.uk).

Introduction

About the TRA

The Trade Remedies Authority (TRA) is an arm's length body of the UK's Department for Business and Trade. It performs trade remedies investigations to determine whether trade remedies are needed to prevent injury to UK industry from dumped or subsidised imports, or a sudden surge in imports, and undertakes reviews in relation to existing measures.

The legislative framework that the TRA operates under is found in the Taxation (Cross-border Trade) Act 2018) ('the Act') and the Trade Remedies (Increase in Imports Causing Serious Injury to UK Producers)(EU Exit) Regulations 2019 ('the Safeguard Regulations').

About safeguard investigations

In safeguard investigation, the TRA investigates whether there has been an unforeseen surge in imports causing serious injury to UK industry of particular categories of goods.

About you

You can apply for the TRA to initiate a safeguard investigation if you are a UK producer (or are acting on behalf of UK producers) and have evidence that:

- goods have been or are being imported into the UK in increased quantities, and
- the importation of the goods in increased quantities has caused or is causing serious injury to UK producers of those goods.

You must provide sufficient evidence to support the initiation of a safeguard investigation as outlined by paragraph 7 of Schedule 5 to the Act. More information on how eligibility is determined can be found in the relevant guidance. You can find out more about our remit and how we work by reading our guidance on trade remedies investigations.

Application process

About this form

Complete this form if you want to apply for a safeguard investigation. This form will provide the information needed to determine whether an investigation will be initiated. You can find more information on how the TRA assesses applications in its guidance.

You must submit your application online through the Trade Remedies Service. When you submit a confidential application, you must also submit a non-confidential version which does not contain any data you think is sensitive. The TRA will publish a copy of the non-confidential application form should the TRA initiate an investigation. You can find out more about what can be considered confidential and how to prepare a non-confidential version of your documents in the relevant guidance.

If you are considering submitting an application for a safeguard investigation and would like to discuss it beforehand, please email contact@traderemedies.gov.uk. You can find more information on completing this application in our Pre-Application Office and application assessment guidance.

If you have any issues or queries about using the Trade Remedies Service, please email contact@traderemedies.gov.uk.

How to complete this application form

Please read and follow all the instructions carefully. You will need to provide evidence to support any claims. You may need to attach supporting documents in appendices to supplement the answers you give.

Please also note the following points:

- Try to avoid leaving any questions blank. If the question is not relevant to you, please try to explain why.
- If the answer to a question is “zero”, “no”, “none” or "not applicable”, please write this rather than leaving the answer blank.
- If you feel you cannot present the information as requested, please contact the Pre-Application Office by emailing contact@traderemedies.gov.uk.
- If there is not enough space in any part of the application form to provide a full answer, please attach 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.
- If you include any documents that are not in English, please provide an English translation.
- Provide all dates in the format DD/MM/YYYY (e.g. 23/05/2019).
- 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).
- Limit all sales/currency/income figures to two decimal places and use the appropriate currency symbol (e.g. £1,300.00).
- All figures should be reported net of tax unless otherwise stated.

- For definitions of the incoterms used throughout this document, please visit the International Chamber of Commerce.

What happens next

Once you have completed this application form you can share a confidential version with the Pre-Application Office to get feedback before you formally submit your application. When you formally submit your application, you will need to submit a confidential and a non-confidential version of this form. Please upload these through the Trade Remedies Service.

Once you have done this:

- you will receive an email confirming the documents have been uploaded successfully;
- the TRA will notify the Secretary of State of your application;
- the assessor(s) of your application will contact you if further information is required; and
- the assessor(s) of your application may contact you to arrange a visit to verify the information contained in your responses.

About the application

An application can only be made by UK producers. Generally, an industry that is concerned about a set of imported goods should make only one application to us for an investigation.

When we assess your application, we will consider information about all the companies which make up the industry that is applying.

When you are answering questions about the goods you produce, please include information about the goods produced by all other UK producers where that information is available to you.

Applicant information

1. In the table below, please provide the required details regarding the applicant UK producer(s). (Duplicate table if necessary.)

Name of applicant UK producer	Alpek Polyester UK LTD
Address	Davies Offices, Wilton International, Redcar, Cleveland, TS10 4XZ
Website	www.alpekpolyester.com
Contact name	[*Redacted - Personal Information*]
Role	Commercial Manager
Telephone No.	[*Redacted - Personal Information*]
Email	[*Redacted - Personal Information*]
Company ownership (provide broad details of shareholding)	[*Redacted - Ownership Information - Redacted as confidential information*]
Name of Lawyer/Representative (please provide a Letter of Authority)	[*Redacted - Personal Information*] Baker & McKenzie LLP 280 Bishopsgate, London EC2M 4RB

Period of investigation

In a safeguard investigation, we normally look at date for the three calendar years preceding your application and any more recent partial year data to assess import trends. This period is hereafter referred to as "period of investigation" (POI).

2. Please specify the proposed POI.

In accordance with TRA guidance concerning the TRA's investigation process (here), the Applicant proposes a POI of five years: 1 January 2021 to 31 December 2025.
Appendix reference: NA

For the subsequent sections, please use the same POI for every question.

The good(s)

Imported goods

3. Describe the imported goods you are concerned about, providing full details of their technical characteristics (if possible, please attach digital versions of images, brochures, catalogues, etc which show the goods in question). We refer to these goods hereafter as the “goods identified”.

This Application concerns imports of:

Poly(ethylene Terephthalate) resin, whether virgin produced Poly(ethylene Terephthalate) "vPET" having a viscosity number of 74 ml/g <u>or higher</u> or recycled Poly(ethylene Terephthalate) ("rPET") of the same viscosity range.

The vPET of concern is a thermoplastic polyester polymer that is highly flexible and colourless, manufactured into pellets (see process below), with an intrinsic viscosity of 74 ml/g or higher.

It is semi-rigid, clear, resistant to impact, moisture, alcohols and solvents. vPET is very strong and lightweight, has good electrical insulation properties, has low gas permeability, does not shatter and is recyclable. It is approved as safe for use in end products which are in contact with food, beverages and pharmaceuticals. The vPET of concern may be used in a variety of end applications, including food and beverage packaging, and other packaging (such as for cosmetics).

The rPET of concern has the same intrinsic viscosity and is chemically identical to vPET and therefore has all of the same technical characteristics set out above, with the exception that there may be greater variation in the colour of rPET as compared to the clear colour of vPET. This does not create a substantial difference between the products.

Image 1a: Image of vPET manufactured via MTR process

Image 1b: Image of rPET manufactured via MTR process

Image 1c: Image of vPET manufactured via Conventional Process

Image 1d: Image of rPET manufactured via Conventional Process

The Applicant hereby requests that the Secretary of State publishes a notice requiring His Majesty's Revenue and Customs ("**HMRC**") to register imports of all PET imported into the UK from the date of initiation of the investigation.

Appendix reference: NA

4. Provide the current tariff classification(s) for the goods identified.

PET is commonly classified under commodity codes 39 07 61 and 39 07 69.

Appendix reference: NA

The like and directly competitive goods

Like goods are defined as goods which are similar to the goods identified in all respects or have characteristics which closely resemble them. When we decide what are like goods, we will consider the following non-exhaustive list of criteria:

- physical likeness, such as physical characteristics

- commercial likeness
- functional likeness, such as end-use or if the goods can be substituted for each other
- similarities in production, such as method and inputs
- other relevant characteristics

Directly competitive goods are goods produced in the UK which are directly competitive with the goods identified.

During our investigations we assess the like and directly competitive goods produced by UK producers.

5. Describe the like goods and directly competitive goods produced by the UK industry (if possible, attach digital versions of images, brochures, catalogues, etc).

The Applicant produces vPET. It is identical to vPET imported into the UK and like rPET (either imported or domestically produced), which it directly competes with. The Applicant produces vPET according to the process set out in response to question 6.

Further details on the comparison as between rPET and vPET are set out in response to question 3 and question 6.

Appendix reference: NA

Comparability between the goods

6. Explain how the like goods produced by the UK industry are like the goods identified. Please cover the following aspects of the goods: the physical, commercial, functional and any other characteristics that describe the goods – provide evidence of similarities and explain any differences:

UK industry produces vPET, which is comparable to, directly competes and is interchangeable with, imported vPET and rPET. These products are virtually chemically and physically identical, are manufactured using the same raw inputs and are commercially interchangeable as they are suitable for the same end-uses. Please see further details below.

As a preliminary point, the UK TRA in its final determination in Case No. TS0060, issued 15 October 2025 (here), determined that vPET and rPET should be considered as the UK PET market (paragraphs 61 and 64). The UK TRA went on in paragraph 68 to determine that the practical uses of vPET and rPET are interchangeable as both can be used in food packaging and, due to regulations, both are needed by the downstream producers of said packaging products.

(a) Raw inputs

- PET is a thermoplastic polymer made from mono ethylene glycol (MEG)($C_2H_60_2$) and terephthalic acid (PTA)($C_8H_6O_4$). It is widely accepted that approximately 0.84 kg of PTA and 0.33 kg of MEG are required to produce 1 kg of PET. See Image 3 below.

- There are no additional raw inputs required to produce rPET, as the addition to the vPET process is plastic flakes created by grinding vPET consumer products (e.g. bottles). The flakes are then blended into vPET to the required percentage blend.

(b) Physical and chemical properties

- rPET and vPET is sold as pellets. All pellets look virtually identical. As a result of the recycled content, there might be a slight variation in the colour and transparency of rPET pellets, though this is not material and often such variances may not be visible to the human eye.

- rPET and vPET pellets are chemically identical, they are all long chain polymers achieving the same viscosity, flexibility, tensile strength and density. There is no physical or functional difference at the polymer level between rPET and vPET.

(c) Production Process

- vPET production process is similar throughout the world and is composed of the following stages:
    - **Esterification** – MEG and PTA are combined at an ambient temperature to form a paste, the paste then undergoes esterification to produce bis(2-hydroxyethyl) terephthalate (BHET), a monomer, and water. This reaction [*Redacted – commercially sensitive information concerning the production process*]

    - **Polycondensation / melt polymerisation** – at this stage BHET monomers react together to form long polymer chains of PET. This reaction takes place under vacuum conditions.

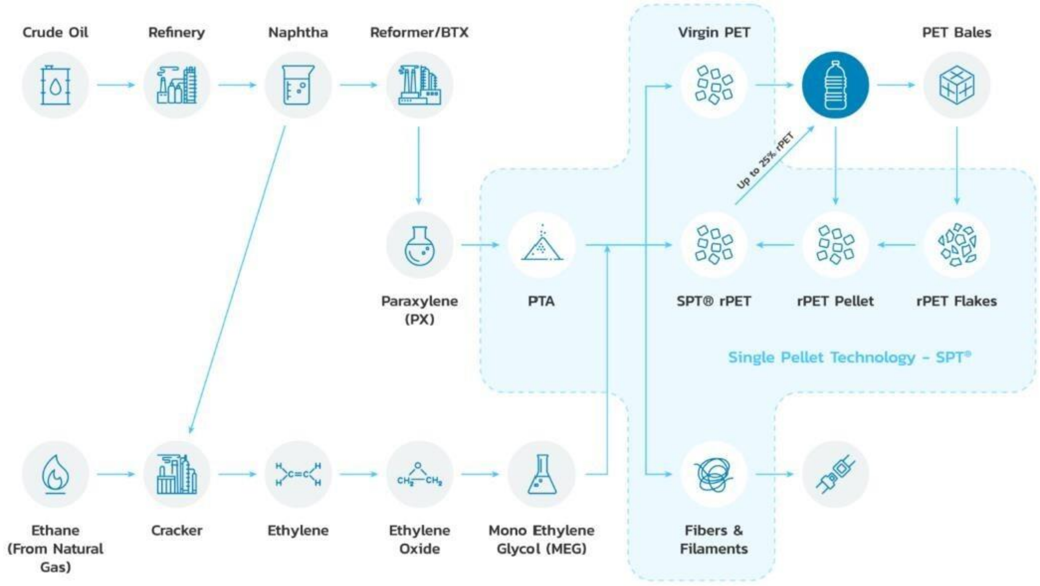
    - **Pelletisation and Crystallisation** –the vPET is then cut into pellets, typically a few millimetres in size. The vPET is then partially quenched in water and fluidised in a silo where it crystalises. Volatile byproducts of the melt polymerisation process, such as acetaldehyde, are removed at this stage. Finally, the vPET pellet is cooled to ambient temperatures.

- As an illustration, the Applicant manufactures vPET via direct esterification of PTA with MEG, followed by polycondensation to achieve molecular weights suitable for bottle-grade applications. Crystallinity is controlled through incorporation of two co-monomers: [*Redacted - Information concerning Domestic Industry's production process - Redacted as commercially sensitive*].

- While it is possible to manufacture vPET via the transesterification of dimethyl terephthalate (DMT) with MEG, the Applicant understands that the above process is generally used in the production of vPET imported into the UK.

- rPET with 50% vPET content is typically produced by the "single pellet technology" ("SPT") process where clear 100% rPET flake/pellet produced from consumer recycling programs are injected into the virgin production process which further decontaminates and undergoes partial glycolysis. This process has the potential to incorporate from 10-50% rPET in every single resin pellet made. The result is an improved method of incorporating PCR into preforms and bottles while delivering nearly the same characteristics and performance as vPET. SPT enables simpler downstream processing for customers focused on adding recycled content to their end-use offerings. With SPT resin having integrated recycled content, dual feeding, inventory and storage of two materials are eliminated at customer operations to add recycled content to their end use offerings.

Image 3: Image of vPET and rPET raw component and process cycle



(d) Distribution and Use

- Applicant produced vPET is identical to imported vPET and therefore has the same functional likeness and end uses. rPET and vPET are generally used for food packaging including containers, bottles and thermoformed sheets.

- All products are distributed through direct sales to the downstream market (food packaging producers), as follows:
    - **Food Packaging Producers**: PET is essential for food packaging, it is essentially for ensuring the preservation and protection of food items. Both vPET and rPET can be used in the same processes to create end products such as blow moulding, injection moulding and extrusion, which the food packaging producer will determine.

    - **Fillers**: Once the food packaging has been manufactured, it is sold to fillers. Fillers are companies that will fill the packaging with the relevant food or beverage item and prepare the finished food or beverage good for distribution.

    - **Retailers**: Retailers are the party who will sell the finished food and beverage items to consumers.

- For completeness, while there may be minor physical differences in between vPET and rPET in terms of colour, transparency and the ability to process rPET due to metal contamination, these differences are not significant and do not affect the interchangeability of rPET and vPET (whether UK produced or imported), or the overall functionality of the product. As such, UK produced vPET competes with rPET.

- In fact, Applicant produced vPET will directly compete with imported PET (both vPET and rPET) for particular sales, as illustrated for example by:

    - [*Redacted – Examples obtained via Domestic Industry's market intelligence – redacted as commercially sensitive information*]

- As such, it is clear that the customer base and potential end use of PET products are the same.

Appendix reference: NA

7. If the goods can be subdivided into separate types of categories – provide details about each of the types of categories, such as their product literature and technical documentation:

PET can be categorised into vPET and rPET, please see responses to question 3 and 5.

Appendix reference: NA

8. Give the tariff classification of the goods (customs commodity code) – if there are multiple types of categories, provide the customs commodity code for each model:

PET is commonly classified under commodity codes 39 07 61 and 39 07 69.

Appendix reference: NA

9. Provide a general description of the UK market for the goods identified, like goods and directly competitive goods, including the nature and conditions of competition within the overall market. In your answer, please refer to:
   - general users/consumers/customers;
   - market segmentation;
   - government regulation or tax;
   - distribution and marketing (for example, how is the product sold and is quality or price the deciding factor);
   - the nature of competition within the overall market;
   - the degree of price sensitivity;
   - the trends and drivers of demand, including causes of demand fluctuations and any factors contributing to overall market growth or decline;
   - developments in technology affecting the characteristics, demand, or the production process of the goods; and
   - any other factors that influence the market.

Please see a summary of the UK market below.UK domestic demand remains slightly under [*Redacted - data concerning PET market from third party subscription - redacted for IP licensing reason*] Mton.

(a) Market Segmentation
- The UK PET market is comprised of two segments, vPET and rPET. Notwithstanding this, vPET and rPET may be used interchangeably (see paragraph 334 of the TRA's Final Recommendation on Case TS0060).

(b) Market Actors
- The Applicant is the sole UK producer of vPET. It does not manufacture rPET. The Applicant understands that there are a number of rPET producers and suppliers in the UK.
- Downstream actors in the UK are comprised of Food Packaging Producers, Fillers and Retailers (see response to question 6).

(c) Competition in the Market
- The UK PET market faces strong competitive pressure from low-cost imports, due to suppliers redirecting excess production from their domestic markets.

- As a result of these factors, the UK market is highly price sensitive. Even small changes to pricing can impact buying decisions as customers are trying to achieve the lowest value of £ per tonne, given the high volumes involved in transactions.

(d) Barriers

- *Entry*: On the production side, there is significant investment required, particularly as it relates to start up and plant maintenance costs.

- *Regulatory Environment:* Government restrictions apply to manufacturing processes and environment requirements. There are currently no tax incentives and finished plastic packaging products are subject to a plastic tax. Such tax does not apply to certain rPET products. In addition, producers established in the UK face more stringent climate-related obligations under the Net Zero policy, which translate into higher compliance and energy costs. These requirements contribute to structurally higher production costs and relative prices in the UK, particularly when compared to products manufactured outside the EU and the UK, using raw materials and processes that are not subject to equivalent Net Zero constraints.

(e) Technology

- Technology investments in the PET market are generally targeted at optimising the production process and product lifecycle (for example, chemical recycling to break plastics back into monomer units) as a result of sustained concerns with ESG, recycling and reducing carbon footprints.

(f) Market Trends

- The PET Resin market is cyclical and subject to seasonal fluctuations. Typically, demand for PET increases in summer and warmer months, with decreased demand experienced across the cooler months.

- It is important to note that this seasonality in demand is not linked to the prices paid by consumers for packaged or bottled products. The influence of PET resin on UK retail prices is limited [*redacted – commercially sensitive pricing information*].

- There has been a negligible increase in demand for rPET as a result of increasing focus on ESG initiatives and reduced carbon footprint.

Appendix reference: 6.1, 23.1 and 23.2

10. We give goods in our investigations Product Control Numbers (PCNs) which are identifiers unique to our work and are created on the basis of the main characteristics differentiating the goods from other goods. We use PCNs to allow comparison between products made by domestic and foreign producers.

    The accuracy of the TRA's PCN structure is directly proportionate to information supplied by the applicant. If the goods concerned cover a range of goods with different characteristics that would affect comparability:

    Please describe the key physical characteristics that have a consequential and material effect on prices, with the list of characteristics going from most to least consequential.

The Applicant respectfully submits that no PCN structure would be necessary in this case. There are no meaningful differences in the physical characteristics between vPET and rPET

requiring the use of a PCN structure. Such approach would be in keeping with the approach adopted by TRA in Case TS0060.

Appendix reference: 6.1

11. Please provide evidence to substantiate that these physical characteristics have a consequential and material effect on prices. This evidence could be in reference to specific unit costs if those costs affect price comparability.

Not Applicable

Appendix reference: NA

12. Use this information to delineate between models of not only the goods produced by the UK industry, but by the exporting producers, giving the information requested in the subsequent sections in reference to each model rather the goods category as a whole. If you already have a view on a PCN structure, please propose that here.

Not Applicable

Appendix reference: NA

Domestic industry

Your application needs to include details of all known UK producers of the like goods and directly competitive goods, or associations of such UK producers.

13. Use the ***Safeguard application form annex – 1 Domestic industry*** to provide the details of all known UK producers of the like goods and directly competitive goods, or associations of such UK producers. (Duplicate columns where necessary.)

The Applicant is the only UK producer of vPET. The Applicant does not have any actual knowledge of a definitive list of UK rPET producers.

However, it notes that in final determination TS0060, the TRA determined that that (paragraph 66):

"*Alpek is the only known domestic producer of vPET and the only producer that registered or provided a questionnaire response. The case team does not hold an exhaustive list of rPET producers however four producers of rPET were identified:*

- *Clean Tech UK Limited*
- *Biffa Limited*
- *Viridor Limited*
- *J&A Young Group Limited.*

Although identified these companies did not register with the case as domestic producers of PET. Data obtained from Companies House for these was used in the construction of UK production estimates".

Appendix reference: NA

In order for us to initiate an investigation, your application must be supported by other UK producers who represent at least 25% of total UK production of the like and directly competitive goods. This is based on production physically located in the UK. The level of support for the application must be greater than the level of opposition among UK producers.

If there are other UK producers, you will need to contact them and ask them to confirm in writing whether they support or oppose this application. We understand that other UK producers may be concerned about providing confidential information for this form. If necessary, you can ask an independent third party to confidentially combine information from the individual companies. Alternatively, the other UK producers can send the information separately to the TRA for us to combine.

16. Use the ***Safeguard application form annex – 1 Domestic industry*** to provide production volumes and values of the like goods and directly competitive goods for:
    a) the United Kingdom (total UK production)
    b) the applicant UK producer(s) (your UK production)
    c) each UK producer.
    (Duplicate columns where necessary.)

Please see tab 1 of the Annex.

The Applicant is the sole UK producer of vPET, it therefore holds 100% share of UK production by volume and value of vPET.

In the UK TRA's final determination for case TS0060 the TRA determined that:

- during the relevant period, the consumption of PET in the UK was 370,000 – 420,000 tonnes and according to TRA estimates, the Applicant was responsible for producing more than half of the UK produced PET (paragraph 60);
- the Applicant's estimated market share of the UK PET market (vPET and rPET) was 20% to 36% (paragraph 62);
- the UK industry of PET was estimated to be composed of 58% vPET and 42% rPET (paragraph 62);
- the Applicant represents the whole of UK vPET production and as vPET represents approximately 58% of the total UK industry in PET, the Applicant represents the largest share of UK industry; and
- it was reasonable to conclude on the basis of the data available to the TRA that the Applicant held the largest individual production share in the UK and a substantial share of the UK market.

As recognised by the TRA in its final determintion for case TS0060 it is difficult to assess the scope of the rPET UK production. As such, the Applicant respectfully seeks to rely on the TRA's final determinations as to the size of the UK PET production as the best available data.

Accordingly, the Applicant has 100% market share by volume and value of the UK vPET market, which translates to 20% to 36% of the total UK PET market.

Appendix reference: 6.1

17. Use the ***Safeguard application form annex – 1 Domestic industry*** to indicate each UK producer's support or opposition to the application.

Not applicable.
Appendix reference: NA

18. Please also attach, as far as possible, each UK producer's written responses regarding their support or opposition of the application.

Not applicable.
Appendix reference: NA

The applicant UK industry/industries should have at least a 1% share of the UK market for the goods (hereafter referred to as "market share requirement"), irrespective of where the goods were produced.

19. Use the ***Safeguard application form annex – 2 UK market*** to demonstrate that you meet the market share requirement.

Please see tab 2 of the Annex. The Applicant has [*non-confidential range: 40% - 47%*] share of the identified UK market during the POI, well in excess of the 1% requirement. It therefore satisfies the market share requirement. [*Redacted: table detailing market share by volume and value per year of the Applicant - commercially sensitive information*] When including rPET, in line with the TRA's final determination of case TS0060, the Applicant has approximately 20% to 36% of the total UK PET market, clearly still in excess of the required 1%.
Appendix reference: NA

20. If you have other specific market share information, please also provide that here.

Not Applicable
Appendix reference: NA

Please note that the requirement can be waived in certain circumstances, for example if your application is about imports preventing a UK industry from establishing a 1% market share.

21. If you think the requirement should be waived, explain why.

Not Applicable
Appendix reference: NA

Increase in imports

Domestic regulations state that in order to determine whether the goods concerned have been or are being imported into the United Kingdom in increased volumes, by reference to the POI, the TRA must consider whether there has been:

a) an absolute increase in the volume of the goods concerned imported into the United Kingdom; or
b) a relative increase in the volume of the goods concerned imported into the United Kingdom compared with the total domestic production in the United Kingdom of the like goods and directly competitive goods.

22. Use the ***Safeguard application form annex – 3 Increased imports*** to provide:
 a) Import volumes and values of the identified goods (Note: The calendar year information should be automatically copied from the ***Safeguard application form annex – 2 UK market***)
 b) Total UK production volumes and values of the like goods and directly competitive goods

 Please provide annual import data covering the last three full calendar years and separately monthly or quarterly import data for the more recent period succeeding the last full calendar year.
 (Duplicate columns where necessary.)

Please see tab 3 of the Annex.

As is evident from the information provided, there have been clear, sustained, and significant year-on-year increases to import volumes of the goods concerned. As can be seen from the import volume data collated in the below table, there was a cumulative 91% increase in imports of PET Resin from 2021 to 2025 and a further sharp 26% increase from 2024 to 2025 alone, demonstrating that the upward trend is both recent and accelerating rather than temporary or cyclical.

This saturation of the UK market of imported PET products has had a detrimental impact on UK industry as competition and significant downward pressure on pricing has been exerted as a result. There has been no corresponding expansion of the UK market or UK production and therefore such increase in imports should be viewed as both an absolute increase and relative increase in import volumes, as demonstrated by the market share data presented on item 27.

The pattern of imports also shows diversification and rapid growth from multiple origins, including both traditional suppliers and new entrants, reinforcing that the increase is broad-based and structural rather than attributable to isolated or temporary factors.

In preparing the Annex, as well as the below table, the Applicant has relied on best available and most comprehensive official data, being HMRC overseas trade data table (here) to identify all imports into the UK of PET under HS codes set out in response to question 4. This dataset provides a robust and reliable basis for assessing import trends consistent with TRA requirements.

Table: Summary of import volumes of PET between 2021 and 2025.

	Volume in Kton					Absolute Variation (kton)		Relative Variation (%)	
Country	**2021**	**2022**	**2023**	**2024**	**2025**	21-25	24-25	**21-25**	**24-25**
Total	**163,8**	**231,3**	**216,7**	**248,3**	**312,6**	**148,9**	**64,3**	**91%**	**26%**
Lithuania	5,1	18,5	36,2	47,5	57,9	52,7	52,7	1031%	22%
Netherlands	81,8	85,8	54,6	49,3	36,4	- 45,4	- 45,4	-55%	-26%
Belgium	4,7	23,1	19,3	29,7	36,2	31,5	31,5	664%	22%

France	9,5	18,7	18,5	21,8	23,6	14,1	14,1	148%	8%
Turkey	10,1	9,8	4,3	5,0	19,8	9,7	9,7	95%	298%
Germany	10,0	8,2	12,2	19,0	18,0	8,0	8,0	80%	-5%
China	9,3	3,7	5,2	2,7	17,6	8,3	8,3	90%	561%
Oman	-	-	-	0,7	14,6	14,6	14,6	N/A	2002%
Vietnam	0,4	2,4	10,7	16,0	12,9	12,5	12,5	2833%	-20%
Nigeria	0,1	1,2	5,4	7,9	10,7	10,6	10,6	17231%	35%
Ireland	7,1	11,8	14,0	10,4	10,5	3,3	3,3	47%	1%
India	0,1	3,8	1,0	5,0	9,6	9,5	9,5	8980%	94%
Indonesia	3,8	8,4	10,6	7,3	9,1	5,2	5,2	137%	25%
Spain	2,9	5,9	6,5	6,5	6,1	3,2	3,2	109%	-5%
Egypt	0,1	0,2	0,0	1,0	5,8	5,7	5,7	8595%	453%
Others	18,6	29,7	18,1	18,7	24,0	5,3	5,3	29%	28%

Source: HMRC * Import data available up to nov/25; for 2025, thus, total values are projected through linear extrapolation.

Taken together, the data demonstrates a clear increase in imports in both absolute and relative terms over the POI, consistent with the criteria set out in UK safeguard regulations.

Appendix reference: NA

23. If relevant, use the ***Safeguard application form annex – 3 Increased imports*** to provide information on your own imports of the identified goods. Please provide annual import volumes and values covering the last three full calendar years and separately monthly or quarterly import volumes and values for the more recent period succeeding the last full calendar year.

The Applicant does not import any goods within scope of the investigation, with the exception of [Redacted - commercially sensitive data– non-confidential range: 12 Kton – 14 Kton] of vPET imported [*Redacted – Information concern Domestic Industry's supply – redacted as commercially sensitive*]] in Q4 2024 to Q1 2025.

Appendix reference: NA

24. State your reasons for importing the goods identified.

The above imports were an isolated occurrence [*Redacted: commercially sensitive information concerning Applicant's business*]

Appendix reference: NA

25. Describe the alleged increased imports of the goods identified. Specify whether the increase is absolute, relative to UK production or both.

Please see response to question 22.

Appendix reference: NA

Domestic regulations permit the TRA to impose safeguard measures against unforeseen surges in imports that have caused, or are causing, serious injury to UK producers. Serious injury includes the threat of significant overall impairment to the position of UK producers where that threat is clearly imminent.

As regards foreseeability, the regulations state that:

"the importation of the goods concerned in increased quantities into the United Kingdom was not foreseeable where the TRA considers that the increase is a result of unforeseen developments.

In determining whether developments were unforeseen, the TRA may consider
a) changes in patterns of demand for the goods concerned, like goods and directly competitive goods;
b) global overcapacity or increases in production capacity of the goods concerned;
c) economic or political crises; and
d) any other factors it considers relevant."

26. Please explain the unforeseen developments that led to the increased imports of the goods identified. Attach any supporting documents.

The following unforeseen circumstances have contributed to the increased quantities. The below trends are validated in data from [*Redacted – third party industry expert report* PET Resin Capacities Report] (see Appendix 23.1) and the [*Redacted – third party industry expert report*] (see Appendix 23.) **The referred appendices correspond to CONFIDENTIAL INFORMATION**: *(1) Unexpected and accelerated increases in global excess capacity (Trend counterfactual)* • Between 2018 and 2021, global capacity increased by [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] at a [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]% CAGR. On the basis of this established trend, market participants would reasonably have expected a continuation of moderate and incremental growth. If this rate had continued, global capacity in 2025 would have been [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] Mton. Actual 2025 capacity, however, was [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] Mton, yielding an unexpected increase of [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] Mton (about [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]% of global supply). • For Asia, a [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]% CAGR from 2018 to 2021, if continued, would imply [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] Mton in 2025. Actual capacity reached [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] Mton, representing an unexpected increase of [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] Mton, or approximately [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]% of total Asian capacity. These deviations represent a clear and significative break from pre-2021 growth trajectories and could not reasonably have been anticipated based on historical trends. • The evidence demonstrates that the observed imbalance is not cyclical in nature but reflects structural excess capacity of an unprecedented scale. The magnitude of capacity additions in Asia has reached a level where installed capacity alone exceeds, and is sufficient to supply, demand in the rest of the world. This represents a fundamental departure from normal market dynamics, where capacity expansion is typically aligned with expected demand growth. Instead, the current situation reflects an economically irrational and high-risk build-up of production capacity, disconnected from underlying consumption patterns. Such a level of structural overcapacity is inherently export-oriented and creates persistent

pressure to offload surplus volumes into third markets, including the United Kingdom. This dynamic could not reasonably have been foreseen based on prior market behavior and constitutes a core driver of the surge in imports in the UK market.

- Recent developments in China, including accelerated capacity expansions, enhanced domestic policy incentives, and expanded access to low-cost Russian oil and naphtha, have led to material changes in global market conditions for PET that were not reasonably anticipated. These developments have enabled Chinese producers to supply PET and key feedstocks at comparatively low prices to third countries, including Vietnam, Taiwan, Indonesia, Malaysia, South Korea, Thailand, and Turkey[1].

- The increased availability of low-priced feedstocks has, in a relatively short period of time, supported additional PET production capacity in these countries. As a result, domestically produced PET in these markets increasingly competes with direct imports of PET from China.

- This competitive dynamic has led to the generation of surplus production in those countries surpassing its domestic demand. These surplus volumes are subsequently exported to third markets to alleviate domestic oversupply, and this has in particular has impacted the UK. This is reflected in the rapid increases in import volumes from Asian markets identified in Question 22 above. Most notably, imports from China have risen 9.3 Kton in 2021 to 17.6 Kton in 2025 (rising from 2.7 Kton to 17.6 Kton in just the space of 2024-25). Other examples include imports from Vietnam (which have risen from 0.4 Kton in 2021 to 12.9 Kton in 2025), imports from India (which have risen from 0.1 Kton in 2021 to 9.6 Kton in 2025) and imports from Indonesia (which have risen from 3.8 Kton in 2021 to 9.1 Kton in 2025).

- Exports arising from Chinese over-capacity are directed to other destination markets as well, including markets where trade remedy measures against imports from China are not currently in force.

- Overall, this trade diversion effect reflects newly emerging market dynamics rather than longer-standing structural conditions and further reinforces the unforeseen nature of the import surge.

(2) *Fundamental changes to Asia PET resin market*

- Beginning in 2021, the market shows a departure from its prior trajectory. Data from the [*Redacted – third party industry expert report*]] reports indicate a trade imbalance emerging in Asia, centered on China, stemming from a rapid acceleration in capacity growth that significantly exceeds the pace observed before 2021 (CAGR [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]% vs. [*Redacted – information obtained via a subscription / paid for product – redacted on basis of 3rd party IP licensing*]% for Asia) far outpacing demand growth ([*Redacted – information obtained via a subscription / paid for product – redacted on basis of 3rd party IP licensing*] Mton only in China, roughly [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] times higher than UK demand). The scale and timing of this expansion constitute a structural discontinuity when compared with pre-2021 patterns.

[1] Russian Oil Most Discounted Since 2023 on Western Sanctions, Bloomberg News (Feb. 23, 2026), https://www.bloomberg.com/news/articles/2026-02-23/russian-oil-most-discounted-since-2023-on-westernsanctions .

- Significant oversupply conditions emerged in the Asian PET market, particularly in China. Demand increased by [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] Mton, while capacity rose by [*Redacted – information obtained via a subscription– redacted on basis of 3rd party IP licensing*] Mton (from [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] to [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] Mton), resulting in accumulated excess capacity of approximately [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] Mton over four years (see Appendix 23.1 and 23.2).This was driven by high production levels and weaker than expected demand from the packaging and beverage sector. This resulted in increased exports to achieve better performance in the global market. This imbalance reflects a structural supply-demand mismatch rather than a cyclical adjustment.

- [*Redacted – third party industry expert report*]]shows that between 2015 and 2021 [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] were opened in Asia. In 2023 alone, however, [*Redacted – information obtained via a subscription / paid for product – redacted on basis of 3rd party IP licensing*] were commissioned. This concentrated wave of commissioning provides a direct operational explanation for the abrupt increase in post-2021 capacity.

- In addition, in 2024 the Zhengzhou Commodity Exchange in China launches a new Bottle Grade PET Resin Futures market, designed to help industry participants hedge risks amid volatile raw material costs. At launch, these future contracts were being traded at a premium.

(3) European Competition

- Over the last few years UK market has seen an increasing and sustained import competition from Lithuania and Belgium. Both countries combined represent an import market share of close to 31% according to registered imports of 2025, with this share increasing year-on-year over the period of investigation, along with significant pricing injury for UK business.

- This growing presence reflects a structural shift in sourcing patterns rather than temporary trade fluctuations, as volumes from these origins have consistently expanded in the UK market.

- Producers in Lithuania and Belgium benefit from comparatively lower cost structures than UK producers, including lower production and operating costs, which enable them to supply the UK market at more competitive price levels. Lithuania and Belgium (as well as the EU more broadly) have also been impacted by global excess capacity discussed above. Consequently, demand from their domestic customers and traditional EU export markets have become more quickly saturated, thereby leaving greater surplus to be exported (or re-exported) to the UK with greater incentive to do so.

- As a result, imports from these countries have exerted significant downward pressure on UK prices, leading to price undercutting and price suppression.

- This dynamic has materially affected the ability of UK producers to compete on commercially viable terms, contributing to pricing injury and loss of market share.

- The scale and persistence of this competitive pressure, combined with the broader global excess capacity conditions described above, have reinforced the increase in imports and intensified their impact on the UK industry.

(4) Raw material effect on the PET value chain

- The PET Resin market has been destabilized by a pronounced volatility in raw material and feedstock costs, in particular PTA and MEG which are closely linked to crude oil markets.

- Fluctuations in crude oil prices have been driven by geopolitical risks since 2022 following Russia's invasion of Ukraine. This uncertainty continues in light of recent US-Venezuela and US-Iran intervention.

- Asian countries, including China and India, have increased their purchases of discounted Russian crude oil, while Taiwan has followed a similar approach with Russian naphtha[2]. In contrast, countries not applying sanctions against Russia have faced a more unpredictable market environment, marked by higher input costs for PET producers and heightened uncertainty.

- This has created a divergence in input cost structures across regions, placing producers operating under market-based conditions at a competitive disadvantage. However, this distortion is not limited to isolated cost differences but reflects a systemic and deeply embedded set of distortions across the entire petrochemical value chain.

In addition, while the UK and Europe are moving away from coal, China plans to restart coal-to-gas projects in Q4 2026, partly due to global gas supply disruptions linked to the U.S. and Israel's conflict with Iran. These projects could increase China's synthetic gas production capacity to around 12% of the country's current gas supply, potentially causing further distortions in MEG prices and the global PET value chain[3].

- In particular, the scale and nature of these distortions - arising from preferential access to discounted feedstocks, state-influenced pricing, and indirect subsidies transmitted through upstream inputs - result in cost advantages that are both structural and cumulative. These effects are not confined to a single stage of production but instead propagate from crude oil and naphtha through intermediates such as paraxylene (PX) and terephthalic acid (PTA), and ultimately into PET resin and rPET markets.

- As a result, the competitive imbalance observed in downstream PET markets cannot be fully understood through traditional price comparisons alone. Conventional trade remedy frameworks, such as antidumping investigations, typically assess pricing by comparing export prices with reported normal values or home market prices, without capturing the extent to which those reference prices themselves may be affected by upstream distortions.

- This creates a material risk that the true scale of the distortion is underestimated, as the underlying cost advantages are embedded across multiple stages of the

[2] Asian Nations Dominate Russia's Wartime Fossil Fuel Trade, Discovery Alert (Aug. 4, 2025), https://discoveryalert.com.au/news/russias-fossil-fuel-trade-shift-2025/ ("approximately 80% of Russian seaborne crude oil exports now go to Asian markets, primarily China and India, compared to roughly 40% before the invasion of Ukraine," which is "one of the most dramatic reorientations of global oil flows in recent history."); July 2025 Monthly analysis of Russian fossil fuel exports and sanctions, Centre for Research on Energy and Clean Air (Aug. 12, 2025), https://energyandcleanair.org/july-2025-monthly-analysis-of-russian-fossil-fuel-exports-and-sanctions/ ("China has bought 47% of Russia's crude {oil} exports, followed by India (38%), the EU (6%), and Turkiye (6%).").

[3] China Restarting Massive Coal-to-Gas Project After Decade-Long Pause, POWER (Apr. 20, 2026), https://www.powermag.com/china-restarting-massive-coal-to-gas-project-after-decade-long-pause/

PET value chain and may not be fully visible in standard pricing benchmarks. In this sense, the distortion operates as a new but structural feature of the market rather than a discrete pricing anomaly.

- Accordingly, the divergence in input costs observed in the period of investigation reflects a broader set of policy-driven and market-distorting conditions that extend beyond the scope of traditional trade remedies and have materially altered global competitive dynamics.

(5) *Expansion of rPET Capacity*

- [*Redacted – third party industry expert report*]] data demonstrates that rPET capacity expanded from [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] Mton in 2021 to [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] Mton in 2025, a [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]% increase (CAGR [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]%). Asia was the primary driver of this growth, increasing from [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*Mton ([*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*], CAGR [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]%). Within Asia, China's capacity rose from [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] to [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] Mton, representing a [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]% CAGR and over [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]% of global absolute capacity growth.

- Based on data from [*Redacted – third party industry expert report*], rPET capacity expanded after 2021 at a rate and magnitude that diverged significantly from the earlier trend, with growth concentrated in Asia and led by China. The resulting [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] Mton excess capacity in China], when contrasted with the UK's domestic demand (slightly under [*Redacted – Information concern Domestic Industry's sales during the period of analysis – Redacted as commercially sensitive*] Mton), contextualises the very large increases in imports into the UK between 2024 and 2025. Relative to the counterfactual implied by pre-2021 growth, the excess [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] Mton globally and [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] Mton in Asia represent a genuine unforeseen development, both in magnitude and in timing. The impact of this is being compounded by the effects of diversion of imports to the UK in response to the US tariffs, which are again indicative of the highly unpredictable nature of trade and policy regarding rPET during the period in question.

(6) *Trade policy responses to structural excess capacity in other major markets*

- The unprecedented imposition of tariffs by the U.S. administration reflects a policy response to recognized structural excess capacity and sustained inflows of low-priced imports, rather than an isolated or unpredictable market event. In September 2025, the United States imposed reciprocal tariffs on imports of PET resin (vPET and rPET), with rates varying significantly by country of origin.

- These measures were adopted in the context of broader concerns regarding export-oriented overcapacity and unfair competitive conditions affecting domestic production, including the impact of low-priced imports on both virgin and recycled PET segments.

- Importantly, the United Kingdom is not alone in facing these pressures. Other major jurisdictions have similarly recognized the effects of excess capacity and have taken steps to protect domestic industries from displacement.

- Canada has imposed antidumping duties of up to 100% on certain PET imports from China and Pakistan. Mexico, as part of a broader tariff reform, increased its import duty on PET resin to 35% and has antidumping duties in effect on imports from China and has initiated investigations concerning imports from, Vietnam, and Malaysia. Brazil has also initiated an antidumping investigation into imports from the latter two countries.

- The European Union has also taken regulatory action under its Single-Use Plastics Directive Implementing Act, aimed at limiting the extent to which non-EU post-consumer waste may count toward recycling targets, in response to the negative effects of imported material on its domestic recycling sector.

- Taken together, these measures demonstrate a consistent pattern across major markets: recognition of structural excess capacity and export-oriented supply, and the adoption of policy responses to address resulting import pressure and displacement of domestic production.

- In this context, the United Kingdom remains exposed to these same underlying global conditions, including sustained surplus capacity and export-oriented production, which continue to contribute to increased import volumes.

(7) *Additional cost distortions linked to labor practices in exporting countries*

- Further unforeseen distortions in the PET value chain have arisen from the persistence of informal and weakly regulated labor practices in certain PET-exporting countries, including instances of forced labor and, in some cases, child labor.

- These developments have materially reduced production and collection costs, particularly in the recycling segment, thereby benefiting recyclers of PET in those countries and enabling the production of low-cost rPET that does not reflect market-based labor conditions.

- The resulting recycled material has increasingly been exported at low prices, reflecting artificially suppressed labor-related costs rather than normal economic conditions.

- Producers in the UK, and in other countries operating under appropriate labor and environmental frameworks, are structurally unable to compete with such cost conditions, which were not present to the same degree prior to the period under investigation.

- As a result, the growing volume of low-priced rPET exports has exerted downward pressure on prices across both recycled and virgin PET segments, undercutting domestic production and materially altering competitive dynamics across the entire PET industry.

- This development reinforces the broader pattern of structural excess capacity by enabling uneconomic production to remain viable and export-oriented, thereby

contributing directly to the increase in imports into the United Kingdom. These trajectories and data, on the unforeseen supply additions, are thoroughly detailed on item 36. This factor seems to be of the uttermost relevance to the import surge.

Appendix reference:

Serious injury

The TRA must determine whether UK producers of the like goods and directly competitive goods have suffered or are suffering serious injury.

In order to determine whether UK producers have suffered or are suffering serious injury, the TRA must assess all relevant economic factors having a bearing on UK producers including

a) the rate and volume of increase of the importation of the goods concerned into the United Kingdom, in absolute or relative terms;
b) the export capacity of the goods concerned in foreign countries or territories and the likelihood that the capacity will be exported to the United Kingdom;
c) the share of the domestic market in the United Kingdom taken by the importation of the goods concerned in increased quantities;
d) changes in the UK producers' level of
   i. sales;
   ii. productivity;
   iii. production;
   iv. capacity utilization;
   v. profits and losses; and
   vi. employment

27. Please describe, with appropriate figures, why you consider UK producers have suffered or are suffering serious injury with reference to each of the factors above. Explain how you have calculated the figures and substantiate your figures with evidence. Provide evidence for each indicator. If you don't know the exact figures for other UK producers, provide an estimate based on reasonable assumptions. State the methodology and assumptions that you used.

This submission, together with the supporting spreadsheet, demonstrates that the Domestic Industry in the United Kingdom is suffering serious injury caused by increased imports of PET. The present case reflects a structural and global market disruption of exceptional scale, characterised by unprecedented excess capacity growth, accelerating import penetration, severe price depression, and rapid deterioration of domestic industry conditions. The evidence demonstrates that these developments are neither temporary nor cyclical, but represent sustained market distortions requiring meaningful safeguard intervention in order to prevent irreversible injury to UK production capability. Import volumes increased significantly (148.868 ton as 90.9%) over the period, moving from 163.753 metric tons in P1 to 312.621 metric tons in P5. The share of the imports also increased substantially in relation to domestic sales, from [*Redacted – Information concern*

Domestic Industry's sales – Redacted as commercially sensitive] to [*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*], as their presence in the UK market expanded significantly.

During the period of investigation, foreign producers increased their export capacity sharply, particularly in Asia. Beginning in 2021, the global PET market diverged sharply from its earlier trend, shifting from the modest 2018-2021 global capacity increase of [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*1.8] rise in UK imports between 2024 and 2025, demonstrating the direct link between China-centered capacity expansion and increased export pressures worldwide.

This deterioration demonstrates a substantial loss of market share previously held by UK producers. Domestic prices fell continuously [*Redacted – Information concern Domestic Industry's prices – Redacted as commercially sensitive*].

Profitability deteriorated accordingly. [*Redacted – Information concern Domestic Industry's financial situation during the period of analysis – Redacted as commercially sensitive*]

Other economic indicators including production, productivity, capacity utilization also deteriorated during the period of injury, summing up to the serious and material injury suffered by domestic industry. In short:

- [Production: Production decreased every year [*Redacted – Information concern Domestic Industry's economic indicators during the period of analysis – Redacted as commercially sensitive*]

- Capacity utilization: Always decreasing utilisation rates [*Redacted – Information concern Domestic Industry's economic indicators during the period of analysis – Redacted as commercially sensitive*]

- Employment: The amount of manufacturing employees is always decreasing in the period of injury [*Redacted – Information concern Domestic Industry's economic indicators during the period of analysis – Redacted as commercially sensitive*]

- Productivity: The sharply declining productivity [*Redacted – Information concern Domestic Industry's economic indicators during the period of analysis – Redacted as commercially sensitive*]

In sum, the increase in imports relative to domestic demand, the [*redacted: information obtained via subscription, 3rd party intellectual property*]% expansion in foreign export capacity, the [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]% fall in the Domestic Industry's market share, the [*Redacted – Information concern Domestic Industry's economic indicators during the period of analysis – Redacted as commercially sensitive*]% decline in domestic sales, the [*Redacted – Information concern Domestic Industry's pricing during the period of analysis – Redacted as commercially sensitive*]% nominal (and [*Redacted – Information concern Domestic Industry's pricing during the period of analysis – Redacted as commercially sensitive*]% real) price reduction, and the [*Redacted – Information concern Domestic Industry's financial situation during the period of analysis – Redacted as commercially sensitive*] profitability all demonstrate that the Domestic Industry is suffering serious injury resulting from increased imports. The evidence meets the requirements of a safeguard investigation under the UK framework and supports the application of safeguard measures.

These points are discussed in detail in the following items.

Appendix reference: NA

Profit/loss

28. Use the ***Safeguard application form annex – 4 Serious injury*** to provide information regarding profit for the like goods and directly competitive during the POI. Where the information cannot be supplied separately for the like goods and directly competitive goods indicate the group of products to which the profit applies and submit your calculations, indicating how costs and profit were allocated.

The table below shows the annual NOPAT (net operating profit after tax) values and margins for Domestic Industry (the sole producer of vPET in the UK) from 2021 to 2025. [*Redacted – Information concern Domestic Industry's financial situation during the period of analysis – Redacted as commercially sensitive*]. As detailed in item 29, the shift in profitability patterns coincides with the imports' surge and with the unforeseen global capacity additions, demonstrating the causal nexus between capacity additions, imports and losses.

Table: Domestic Industry profitability

	NOPAT margin	
	GBP	%
2021	[*Redacted - figures re profitability, commercially sensitive information*]	[*Redacted - figures re profitability, commercially sensitive information*]
2022	[*Redacted - figures re profitability, commercially sensitive information*]	[*Redacted - figures re profitability, commercially sensitive information*]
2023	[*Redacted - figures re profitability, commercially sensitive information*]	[*Redacted - figures re profitability, commercially sensitive information*]
2024	[*Redacted - figures re profitability, commercially sensitive information*]	[*Redacted - figures re profitability, commercially sensitive information*]
2025	[*Redacted - figures re profitability, commercially sensitive information*]	[*Redacted - figures re profitability, commercially sensitive information*]

Source: Domestic Industry

The analysis of the Domestic Industry's monthly price indicators shows a [*redacted: commercially sensitive*] significant and continuous deterioration in both nominal and real prices throughout the period of investigation (P1–P5). [*Redacted – Information concern Domestic Industry's pricing during the period of analysis – Redacted as commercially sensitive*].

Regarding price depression, the table below shows the nominal average prices for 2022 to 2025, the CPI and the real prices (2025 values) for Domestic Industry's sales of the similar product (we exclude 2021 since the injury scenario, import surges and capacity expansion all date from 2023). As one can see, from 2022 to 2025, the price is always decreasing, [*Redacted – Information concern Domestic Industry's pricing during the period of analysis – Redacted as commercially sensitive*].

Table: Real and nominal prices Index for the Domestic Industry

	Nominal Price Index	CPI Index (June)	Real prices (2025 values) Index	Variations to 2025 Index
2022	100	121,8	100	171
2023	79	131,5	73	126
2024	74	134,1	67	115
2025	67	138,9	58	100

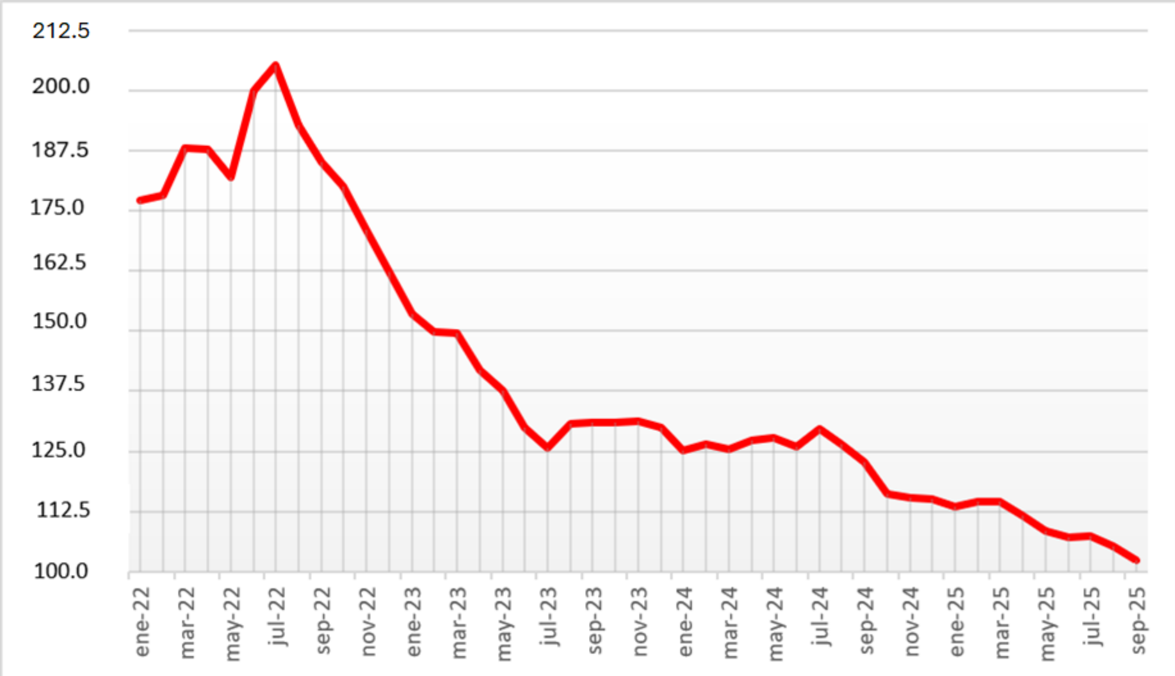
Source: Domestic Industry and Office for National Statistics

This trajectory highlights persistent price depression induced by import surge. [*Redacted: commercially sensitive information concerning Applicant's financial information*], reinforcing the existence of serious injury under Article 4.2(a) of the Agreement on Safeguards.

The magnitude, continuity, and economic significance of the price reductions from P1 to P5 constitute clear, objective evidence that the Domestic Industry experienced worsening market conditions throughout the period, consistent with the injury indicators required under the Agreement on Safeguards.

We can also build a monthly data series on real prices, which is illustrative of the injury scenario regarding prices and its effects on profitability. The figure below shows real prices (deflated by CPI) for 2022 to 2025; the prices are steeply and continuously decreasing from July 2022 up to September 2025.

Figure: Domestic Industry Monthly prices Index (Sep/2025 values) – 2022-2025



Source: Domestic Industry and Office for National Statistics

Please find below data on costs incurred by the Domestic Industry in the POI, from which one can conclude that the movements on profitability exposed above remain if other cost and profit concepts are used. Such data can be found in the Tab 4 of the Annex, together with other relevant pre-tax and after-tax financial result rubrics.

Table: Costs of the Domestic Industry

	2022	2023	2024	2025
Manufacturing Cost of Goods Sold	[*Redacted – Information concern Business Operation– redacted as commercially sensitive*]	[*Redacted – Information concern Business Operation– redacted as commercially sensitive*]	[*Redacted – Information concern Business Operation– redacted as commercially sensitive*]	[*Redacted – Information concern Business Operation– redacted as commercially sensitive*]
Purchased Finished Goods	[*Redacted – Information concern Business Operation– redacted as*	[*Redacted – Information concern Business Operation– redacted as*	[*Redacted – Information concern Business Operation– redacted as*	[*Redacted – Information concern Business Operation– redacted as*

	commercially sensitive]	*commercially sensitive*]	*commercially sensitive*]	*commercially sensitive*]
Other Cost of Goods Sold	*[Redacted – Information concern Business Operation– redacted as commercially sensitive*]	*[Redacted – Information concern Business Operation– redacted as commercially sensitive*]	*[Redacted – Information concern Business Operation– redacted as commercially sensitive*]	*[Redacted – Information concern Business Operation– redacted as commercially sensitive*]
Fixed Manufacturing costs	*[Redacted – Information concern Business Operation– redacted as commercially sensitive*]	*[Redacted – Information concern Business Operation– redacted as commercially sensitive*]	*[Redacted – Information concern Business Operation– redacted as commercially sensitive*]	*[Redacted – Information concern Business Operation– redacted as commercially sensitive*]

Source: Domestic Industry* Revenues are extrapolated and cost concepts refer to FY2025

Appendix reference: NA

29. Comment on the changes in profits.

2023 is the turning point for profitability for the domestic vPET industry. The temporal correlation between this pattern and both the import and capacity surges is detailed below.

The table below puts side to side the annual variations in capacity for Asia (please refer to item 36 for the whole story on capacities) and the World and the NOPAT margins of the Domestic Industry in the UK. The pattern is clear: the structural break on capacity additions in 2022 to 2023 is simultaneous to the structural break on profitability. [*Redacted – Information concern Domestic Industry's financial situation during the period of analysis – Redacted as commercially sensitive*].

Table: Capacity additions and capacity (2021-2025)

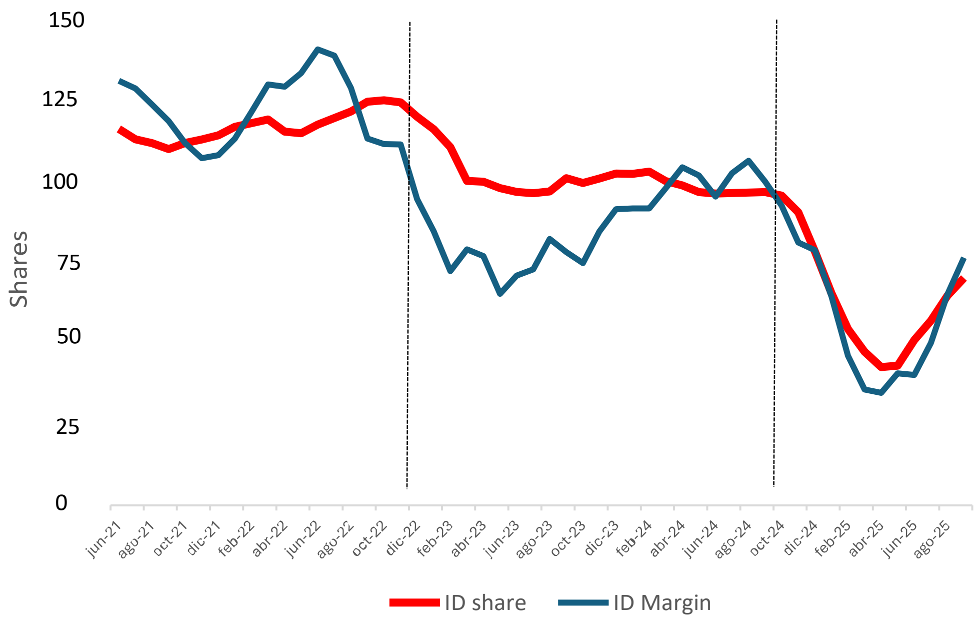
	Asia		World		Domestic Industry margin
	Capacity (kton)	Variation (%)	Capacity (kton)	Variation (%)	
2020	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	*[Redacted - figures re profitability, commercially sensitive information*]
2021	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	*[Redacted - figures re profitability, commercially sensitive information*]
2022	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	*[Redacted - figures re profitability, commercially sensitive information*]
2023	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	*[Redacted - figures re profitability, commercially sensitive information*]
2024	*[Redacted – information obtained via a*	*[Redacted – information obtained via a*	*[Redacted – information obtained via a subscription –*	*[Redacted – information obtained via a subscription –*	*[Redacted - figures re profitability, commercially sensitive information*]

	subscription – redacted on basis of 3rd party IP licensing]	*subscription – redacted on basis of 3rd party IP licensing*]	*redacted on basis of 3rd party IP licensing*]	*redacted on basis of 3rd party IP licensing*]	
2025	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted - figures re profitability, commercially sensitive information*]

Source: Domestic Industry and [Redacted – third party industry expert report

As per the volume of imports, we dispose of monthly data, which are highly informative. The graph below plots the domestic industry shares[4] and NOPAT margins, in a 6-month moving average (to smoothen the trajectories), from 2021 to 2025 (September); margins are represented by the blue curve and projected in the secondary axis. As one can infer, the trajectories are quite parallel, especially in 2024 and 2025, that is, **when imports penetrate,** [*Redacted – Information concern Domestic Industry's financial situation during the period of analysis – Redacted as commercially sensitive*.]

Figure: Monthly NOPAT margins and domestic industry shares Index– 6-month moving average



Source: Domestic Industry and HMRC

Appendix reference:

Output

30. Based on your information regarding UK production of the like goods and the directly competitive goods provided in the ***Safeguard application form annex – 3 Increased imports***, comment on any changes observed.

[4] Domestic Industry sales / (Imports + Domestic Industry sales)

The table below summarizes the UK's Domestic Industry sales, imports and the inferred total demand from the sum of such quantities, as well as import and Dometic Industry shares; demand does not consider, due to data availability, rPET sales, but are sufficiently precise and representative for the purposes herein.

As one can see, Domestic Industry sales fell [*Redacted – Information concern Domestic Industry's economic indicators during the period of analysis – Redacted as commercially sensitive*], while imports almost doubled (almost +150 kton), which accounts for a [*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*] increase in demand in the period. As a result, Domestic Industry shares were [*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*] -

	Domestic Industry Sales	Imports	Total demand	Domestic Industry share	Import share
2021	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**	163.753	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**
2022	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**	231.255	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**
2023	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**	216.697	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**
2024	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**	248.335	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**
2025	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**	312.621	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**
Variation (absolute)	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**	148.868	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**
Variation (%)	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**	90,9%	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**	**[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]**

Source: Domestic Industry and HMRC * Import data available up to nov/25 and Domestic Industry sales up to sep/25; for 2025, thus, total values are projected through linear extrapolation.

That means, even with a sharp increase in demand, Domestic Industry sales plummeted, clearly demonstrating the injury to the Domestic Industry. A counterfactual exercise helps quantify the injury; we keep the 2021 shares constant and calculate the domestic industry demand, given the total demand calculated above, for each year, and calculate foregone sales and revenues. The calculations are presented in the table below, [*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*].

	Total demand	Domestic Industry counterfactual share	Domestic Industry counterfactual demand	Domestic Industry actual demand	Diverted demand	Prices	Foregone revenue
2022	[*Redacted – Information concern Domestic Industry's sales – Redacted as*	50,9%	[*Redacted – Information concern Domestic Industry's sales – Redacted as*	[*Redacted – Information concern Domestic Industry's sales – Redacted as*	[*Redacted – Information concern Domestic Industry's sales –*	[*Redacted – Information concern Domestic Industry's pricing –*	[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]

	commercially sensitive]		*commercially sensitive*]	*commercially sensitive*]	*Redacted as commercially sensitive*]	*Redacted as commercially sensitive*	
2023	[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]	50,9%	[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]	[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]	[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]	[*Redacted – Information concern Domestic Industry's pricing – Redacted as commercially sensitive*	[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]
2024	[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]	50,9%	[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]	[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]	[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]	[*Redacted – Information concern Domestic Industry's pricing – Redacted as commercially sensitive*	[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]
2025	[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]	50,9%	[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]	[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]	[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]	[*Redacted – Information concern Domestic Industry's pricing – Redacted as commercially sensitive*	[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]
Total					[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]	[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]	[*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]

Appendix reference: NA

31. Based on your information regarding total UK sales of the goods identified, like goods and directly competitive goods provided in the ***Safeguard application form annex – 2 UK market***, comment on the changes in production in comparison to UK consumption.

In item 30, domestic industry sales and shares were calculated, showing a sharp decline in both indicators [*Redacted – Information concern Domestic Industry's economic indicators during the period of analysis – Redacted as commercially sensitive*]. The evolution in the production is rather correlated, as shown in the table below. **Production decreased** [*Redacted – Information concern Domestic Industry's economic indicators during the period of analysis – Redacted as commercially sensitive*] **kton), another factor of material injury to the domestic industry.**

	Production volume Index	YoY Variation
2021	100	N/A
2022	88	-11,8%
2023	72	-18,5%
2024	63	-12,8%
2025	59	-5,8%
Abs. Variation (ton)	41	
% variation	-40,9%	

Source: Domestic Industry

Appendix reference: NA

Employment and productivity

32. Use the ***Safeguard application form annex – 4 Serious injury*** to provide information regarding employment and productivity.

The table below presents information on total amount of workers employed by Domestic Industry in the subject product manufacturing lines, as well back-office employees and total employment. The amount of **manufacturing employees is decreasing** [*Redacted – Information concern Domestic Industry's economic indicators during the period of analysis – Redacted as commercially sensitive*], **another element of material injury to the domestic industry.**

	Total employment	Manufacturing employees	Business support employees
2021	100	100	100
2022	100	100	100
2023	100	99	105
2024	98	96	105
2025	94	93	100

Source: Domestic Industry

Combining data on employment and on Production (item 31), one can infer information on productivity, as shown in the table below. [*Redacted – Information concern Domestic Industry's economic indicators during the period of analysis – Redacted as commercially sensitive*].

	Production volume (Ton)	Manufacturing employees	Units per employee
2021	100	100	100
2022	88	100	88
2023	72	99	73
2024	63	96	65
2025	59	93	64

Source: Domestic Industry

Appendix reference: NA

Capacity and capacity utilisation

33. Use the ***Safeguard application form annex – 4 Serious injury*** to provide information regarding capacity and capacity utilisation for the like goods and directly competitive goods.

The table below summarizes information on production capacity and utilisation rates. As one can infer, capacity was constant during the period of injury, so that the capacity utilisation profile followed the production profile: [*Redacted – Information concern Domestic Industry's* *economic indicators during the period of analysis – Redacted as commercially sensitive*] throughout the period of injury, another factor of material injury to the domestic industry. [*Redacted – Information concern Domestic Industry's economic indicators during the period of analysis – Redacted as commercially sensitive*].

	Total capacity (kton)	Actual production (kton)	Capacity utilisation (%)
2021	100	100	100
2022	100	88	88
2023	100	72	72
2024	100	63	63
2025	100	59	59

Source: Domestic Industry

If the trend in import volumes continues to affect capacity utilization at the observed rate during the period [*Redacted – Information concern Domestic Industry's economic indicators during the period of analysis – Redacted as commercially sensitive*], there exists a significant risk that the UK domestic industry will suffer a permanent loss of PET production capacity, the recovery of which would be extremely difficult, if not unfeasible to restore.

Appendix reference: NA

34. State whether production capacity can be increased without additional machinery, equipment and buildings indicating the method (e.g., more shifts, hours, or labour units) and the extent of the possible increase in terms of volume.

Nominal capacity already takes into account a maximized number of shifts, hours and labour units, and material increases in production capacity involve additional machinery and plant commissioning (as the limiting factors are machinery and equipment).

Appendix reference: NA

Other injury information

35. Please indicate any other injury information to be considered by the TRA and not covered by the questions above.

Domestic Industry remains at disposal for any clarification deemed necessary.

Appendix reference: NA

Threat of serious injury

It is not necessary to complete this section if you can prove actual current serious injury.

Any allegation of threat of serious injury should be based on concrete evidence. Information provided on threat should be sufficient to clearly indicate that serious injury is clearly imminent.

36. Give details on the freely disposable capacity or imminent substantial increase in capacity of the exporter(s).

As demonstrated herein, starting in 2021, the global PET market diverged sharply from its earlier trend, shifting from the modest 2018–2021 global capacity increase of [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]. The surplus spilled into global markets, with Asian origins accounting for [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] rise in UK imports between 2024 and 2025, demonstrating the clear link between China-centered capacity expansion and increased export pressures worldwide.

In greater detail, the graph below shows in index numbers the expansion trajectory of PET capacity for selected producing regions from 2018 to 2025. Up to 2021, the growth trajectory was relatively smooth for all origins, with a modest growth rate. From 2021 onward, a structural break can be observed in Asia's growth rates, driven by China, which in turn pushed up the global growth rate. As shown, China's capacity [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] while Asia's capacity, [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]. Global production capacity [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*], equivalent to approximately [*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*] times the UK's projected demand for 2025.

Figure: Capacity for PET– selected origins – 2018 – 2025 – Index

Source: [*Redacted – third party industry expert report*]

The table below presents the evolution of capacity in Asia, China, and globally, together with the corresponding growth rates. As can be seen, between 2018 [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] and 2021 [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*], global capacity increased by [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*], while CAGR across the selected geographies ranged between [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]. Over the following four years, capacity additions totaled [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] Mt, with CAGR of [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] for the world, Asia, and China, respectively.

Table: Capacity for PET – China,. Asia, World – 2018 – 2025

	Asia	World	China
2018	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
2019	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
2020	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
2021	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
2022	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
2023	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
2024	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
2025	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
2018-2021 - absolute	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
2018-2021 - CAGR	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
2021-2025 - absolute	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
2021-2025 - relative	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]

Source: [*Redacted – third party industry expert report*]

The structural break in growth trajectories in 2021 is evident. Market expectations are typically formed based on past growth rates (in economic terms, this is associated with adaptive expectations, or a martingale-type process), underscoring the unpredictability of the structural shock. The table below presents a counterfactual exercise designed to quantify this unpredictability. In essence, the 2018–2021 CAGR for each origin is projected over the following four-year period, representing a reasonable expectation that economic agents in 2021 might have held regarding 2025 capacity levels (the counterfactual). As shown, the gap between actual and counterfactual capacity is on the order of [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] Mt, implying that realized growth up to 2025 was approximately five times higher than expected in 2021(marginally less than [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] Mt of growth expected in 2021). Around [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]% of total global capacity in 2025 was unforeseen in 2021; for China, this share reaches [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]%.

Table: Capacity for PET – China, Asia, World – Counterfactual

	Asia	World	China
2025 actual capacity (kton)	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
CAGR 2018-2021	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
CAGR 2021-2025	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
2021 actual capacity (kton)	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
2025 counterfactual capacity (kton)	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
Differential (counterfactual – actual)	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
% Diff	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]

Source: [*Redacted – third party industry expert report*]

The capacity asset data in table below shows that between 2015 and 2021 *Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] new plants were opened in Asia. In 2023 alone, however, [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] facilities were commissioned. [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] were commissioned in China from 2015 to 2021, while [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] were opened from 2022 to 2024. This concentrated wave of commissioning provides a direct operational explanation for the abrupt increase in post 2021 capacity.

Table: # of Plants for Asia and China – 2015 – 2025

	Asia		China	
Period	**# plants**	**Variation**	**# plants**	**Variation**
2015	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]

2016	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
2017	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
2018	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
2019	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
2020	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
2021	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
2022	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
2023	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
2024	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
2025	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]

Source: [*Redacted – third party industry expert report*]

It is now useful to contrast capacity additions in China and Asia with domestic PET demand, as summarized in the table below. No significant oversupply emerged in Asia during the 2018–2021 period. Between 2022 and 2025, however, excess capacity of approximately [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] was created—roughly [*Redacted – Information concern Domestic Industry's sales during the period of analysis – Redacted as commercially sensitive*] times the size of UK demand. Two important conclusions follow. First, this further supports the notion of unpredictability, as the increase in capacity was not accompanied by a corresponding rise in demand. Second, given the global dynamics of the PET market, in which regional supply-demand imbalances tend to spread across interconnected consumer markets worldwide, this development placed pressure on domestic producers in multiple regions, reinforcing the causal relationship between capacity expansion and the import surge experienced by the UK.

Table: Capacity and Demand for Asia and China – 2018 – 2025							
		Asia			China		
		Capacity	Demand	Excess Capacity	Capacity	Demand	Excess Capacity
Pre-shock	**2018**	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*
	2019	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*
	2020	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*
	2021	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*
	Variation	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*
Post-shock	**2022**	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*
	2023	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*
	2024	*[Redacted – information*	*[Redacted – information*	*[Redacted – information*	*[Redacted – information*	*[Redacted – information*	*[Redacted – information*

		obtained via a subscription – redacted on basis of 3rd party IP licensing]	*obtained via a subscription – redacted on basis of 3rd party IP licensing*]	*obtained via a subscription – redacted on basis of 3rd party IP licensing*]	*obtained via a subscription – redacted on basis of 3rd party IP licensing*]	*obtained via a subscription – redacted on basis of 3rd party IP licensing*]	*obtained via a subscription – redacted on basis of 3rd party IP licensing*]
	2025	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
	Variation	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]

Source: [*Redacted – third party industry expert report*]

Finally, the table below further strengthens the causal argument by showing the change in imports between 2024 and 2025 for selected Asian origins. Approximately 80% ([*Redacted – commercially sensitive confidential information*]) of the increase in UK imports over this period ([*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]) can be attributed to these origins. Although capacity expansion was concentrated in China, the initial adjustment in the supply-demand balance occurred at the broader Asian regional level. Chinese exports displaced domestic supply in other countries, which was subsequently redirected to other destinations worldwide, including the UK.

Table: Imports by origin – 2024 and 2025 (ton)

	2024	2025	Difference
Turkey	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
China	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
Oman	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
India	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
Indonesia	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]

UAE	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
Sum	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]
Total	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]

Source: [*Redacted – third party industry expert report*]

Appendix reference:

37. State and evidence whether the demand for imports of the goods identified is likely to further increase.

The table below presents the expected growth rates for capacity in Asia, China, and globally, based on Wood Mackenzie data. As shown, the projected CAGR are broadly in line with those recorded between 2018 and 2021. This conclusion, however, should be interpreted with a grain of salt. First, these growth rates now apply to a market that already represent overcapacity, which means that, in absolute terms, capacity additions will very likely continue to outpace domestic demand growth. Second, the UK domestic industry is already suffering injury. Market share [*Redacted – Information concern Domestic Industry's sales during the period of analysis – Redacted as commercially sensitive*]. As a result, there is now a smaller domestic base left to be contested, and even capacity growth at 'normal' rates is already enough, at the very least, to maintain the current *status quo* of depressed domestic market share. Third, part of the causal relationship—particularly regarding the imports from Asia—may be price-related, and there is no reason to expect a change in the pricing practices of Asian and Chinese exporters.

Table: Capacity projections – 2025 – 2029

	Asia	World	China
2025	[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]	[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]	[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]
2026	[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]	[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]	[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]
2027	[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]	[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]	[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]
2028	[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]	[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]	[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]
2029	[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]	[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]	[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]
CAGR	[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]	[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]	[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]

Source: [*Redacted – third party industry expert report*]

Additionally, a further factor likely to stimulate imports and place additional pressure on the domestic industry are the trade remedies currently in force in respect of the product concerned, as summarised in the table below. These measures create scope for trade diversion towards markets that are not currently protected, such as the UK, thereby further underscoring the importance of the present measure.

Case/ Country	Product	Origin/Countries	Status	Measure
Republic of Korea	Polyethylene Terephthalate (PET) Resin codes 3907.61 (viscosity ≥ 78 ml/g)[5]	**China**	In force (since 30 November 2024)	Antidumping imposed
Namibia	Polyethylene Terephthalate (PET) Resin codes 3907.61 (viscosity ≥ 78 ml/g)[6]	**China**	In force (since 19 May 2020)	Antidumping imposed
South Africa	Polyethylene Terephthalate (PET) Resin codes 3907.61 (viscosity ≥ 78 ml/g)[7]	**China**	In force (since 19 May 2020)	Antidumping imposed
Eswatini	Polyethylene terephthalate (PET) codes 3907.61 (viscosity ≥ 78 ml/g)[8]	**China**	In force (since 19 May 2020)	Antidumping imposed
Lesotho	Polyethylene terephthalate (PET) codes 3907.61 (viscosity ≥ 78 ml/g)[9]	**China**	In force (since 19 May 2020)	Antidumping imposed
Botswana	Polyethylene terephthalate (PET) codes 3907.61 (viscosity ≥ 78 ml/g)[10]	**China**	In force (since 19 May 2020)	Antidumping imposed
Brazil	Polyethylene terephthalate (PET) codes 3907.61 (viscosity ≥ 78 ml/g)[11]	**India and China**	In force (since 25 November 2022) Measure is in force until 24/11/2027	Antidumping imposed
United Kingdom	Polyethylene terephthalate (PET) codes 3907.61 (viscosity ≥ 78 ml/g)[12]	**India**	In force (since 1 January 2021) Latest extension date (29 July 2025)	Countervailing
United States	Polyethylene terephthalate (PET) codes 3907.61 (viscosity ≥ 78 ml/g)[13]	**India and China**	In force (since 6 May 2016) Latest extension date (11 April 2022)	Countervailing
European Union	Polyethylene terephthalate (PET) codes 3907.61 (viscosity ≥ 78 ml/g)[14]	**Chinese Taipei Indonesia Republic of Korea Malaysia Thailand**	In force (Since 30 November 2000) Latest extension date (19 August 2025)	Countervailing

Appendix reference:

38. Give any other information relevant to your allegation that the infliction of serious injury is imminent.

The Domestic Industry remains at disposal for any clarification deemed necessary.

Appendix reference:

[5] World Trade Organization. (2024). Anti-dumping investigation KOR-24-001 (Republic of Korea – Polyethylene terephthalate (PET) resin). WTO Trade Remedies Data Portal. https://trade-remedies.wto.org/en/antidumping/investigations/measures/kor-24-001
[6] World Trade Organization. (2020). Anti-dumping investigation ZAF-231118-1 (Namibia). WTO Trade Remedies Data Portal. https://trade-remedies.wto.org/en/antidumping/investigations/measures/zaf-231118-1
[7] World Trade Organization. (2020). Anti-dumping investigation ZAF-231118-1 (South Africa). WTO Trade Remedies Data Portal. https://trade-remedies.wto.org/en/antidumping/investigations/measures/zaf-231118-1
[8] World Trade Organization. (2020). Anti-dumping investigation ZAF-231118-1 (Eswatini). WTO Trade Remedies Data Portal. https://trade-remedies.wto.org/en/antidumping/investigations/measures/zaf-231118-1
[9] World Trade Organization. (2020). Anti-dumping investigation ZAF-231118-1 (**Lesotho**). WTO Trade Remedies Data Portal. https://trade-remedies.wto.org/en/antidumping/investigations/measures/zaf-231118-1
[10] World Trade Organization. (2020). Anti-dumping investigation ZAF-231118-1 (**Botswana**). WTO Trade Remedies Data Portal. https://trade-remedies.wto.org/en/antidumping/investigations/measures/zaf-231118-1
[11] Ministério do Desenvolvimento, Indústria, Comércio e Serviços (MDIC). (n.d.). *Medidas antidumping em vigor – Resina PET.* Governo Federal do Brasil. https://www.gov.br/mdic/pt-br/assuntos/comercio-exterior/defesa-comercial-e-interesse-publico/medidas-em-vigor/medidas-em-vigor/resina-pet
[12] World Trade Organization (2025). Countervailing duty investigation United Kingdom. WTO Trade Remedis Data Portal. https://trade-remedies.wto.org/en/countervailing/investigations/measures/2020-32-in
[13] World Trade Organization (2022). Countervailing duty investigation United States. WTO Trade Remedis Data Portal. https://trade-remedies.wto.org/en/countervailing/investigations/measures/usa-c-533-862
[14] World Trade Organization (2025). Countervailing duty investigation European Union. WTO Trade Remedis Data Portal. https://trade-remedies.wto.org/en/countervailing/investigations/investigation/eu-as426-in

Causes of serious injury

The TRA must determine whether or not serious injury has been, or is being, caused to UK producers by the importation of the goods identified in increased quantities into the United Kingdom.

Included in what the TRA may consider are:

a) price effects of the importation of the goods identified on like goods and directly competitive goods in the United Kingdom, including the depression or suppression of price increases which would have otherwise occurred;
b) volume effects of the importation of the goods identified on like goods and directly competitive goods in the United Kingdom; and
c) any other known factors that it considers relevant.

The TRA must consider whether any known factors other than the importation of the goods identified in increased quantities into the United Kingdom have caused or are causing serious injury to UK producers. The TRA must not attribute to the goods identified injury caused by known factors other than the importation of the goods identified into the United Kingdom.

39. Give the reasons for your belief that imports of the goods identified are the cause of the alleged serious injury or threat of serious injury.

This submission comprises relevant evidence demonstrating three specific developments: (i) injury to the domestic industry, in terms of prices, margins, and sales volumes; (ii) an import surge; and (iii) an increase in global PET capacity between 2022 and 2025 that could not have been foreseen based on the information available to economic agents in 2021. In summary, the facts presented throughout this document supporting these findings are as follows:
(i) Injury:
• Margins: In 2021 and 2022, Domestic Industry margins were [*Redacted – Information concern Domestic Industry's financial situation during the period of analysis – Redacted as commercially sensitive*].
• Prices: From 2022 to 2025, Domestic Industry prices decreased [*Redacted – Information concern Domestic Industry's pricing during the period of analysis – Redacted as commercially sensitive*].
• Volumes and shares: Domestic Industry sales fell [*Redacted – Information concern Domestic Industry's sales during the period of analysis – Redacted as commercially sensitive*].
• Other indicators: Production decreased [*Redacted – Information concern Domestic Industry's economic indicators during the period of analysis – Redacted as commercially sensitive*].
(ii) **Import surge**: Imports almost doubled from 2021 to 2025.
(iii) **Unforeseen capacity additions**: Annual growth rates for capacities in the relevant geographies (World, Asia and China) for 2018-21 were between [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]; for 2022-2025, they peaked at more than [*Redacted –*

information obtained via a subscription – redacted on basis of 3rd party IP licensing] a year, in a structural break in the capacity trajectories. The actual increase in capacity was [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] % of the total capacities in 2025 for such geographies were attributable to unforeseen additions.

Throughout this document, a range of evidence has been presented regarding the causal relationships (iii) → (ii) and (ii) → (i). The first argument is theoretical in nature. The PET market is global in scope, owing to the existence of well-established logistical flows, the internationalization of the main producers, the use of the product as an industrial input—which makes consumers highly price-sensitive—and the presence of import-parity clauses.

In this context, local supply-demand imbalances, such as those observed in Asia between 2022 and 2025, tend to spread rapidly across global markets in terms of both prices and quantities. In the present case, the increase in supply (capacity) displaced sales from the UK domestic industry; this phenomenon likely occurred in other countries as well, given that only [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] of the increase in capacity ([*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]) was redirected to the UK (through an increase of [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] in imports).

Within this theoretical framework, the second argument becomes particularly relevant: the contemporaneity of the three events. The figure and table below, already presented in item 28, show, first, the parallel evolution of margins (injury) and market shares (import surge) and, second, the parallel evolution of margins and market shares alongside installed capacity in Asia and globally.

- In 2021 and 2022, the margins [*Redacted – Information concern Domestic Industry's financial situation during the period of analysis – Redacted as commercially sensitive*], and the capacity additions peak at [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]% for Asia in 2023/2024. The absolute capacity additions are of [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] and [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] for 2023 and 2024, respectively.

Table: Capacity additions and capacity (2021-2025)

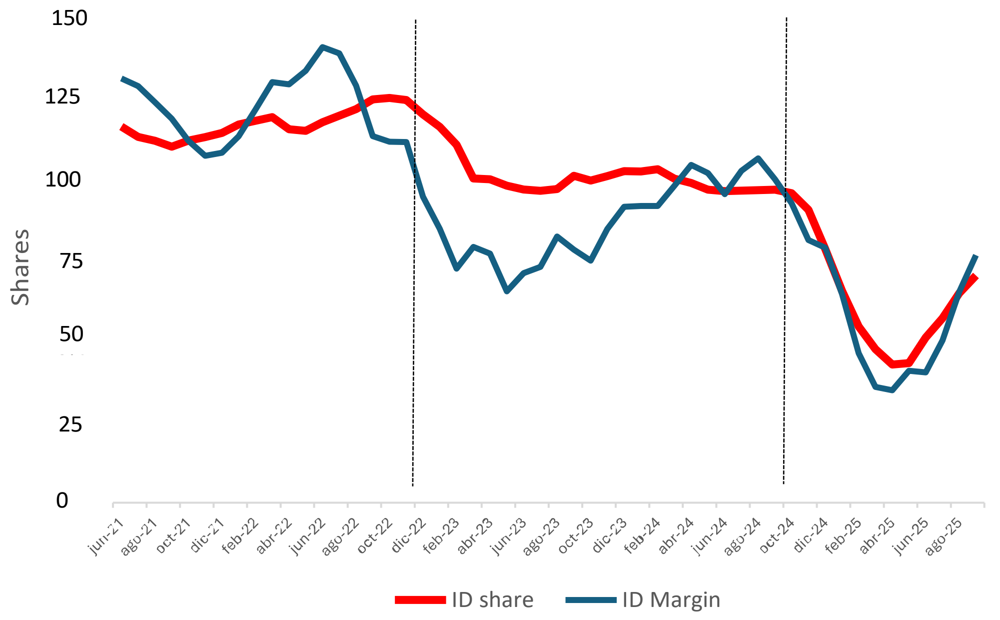
	Asia		World		Domestic Industry margin
	Capacity (kton)	Variation (%)	Capacity (kton)	Variation (%)	
2020	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted - figures re profitability, commercially sensitive information*]
2021	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]	[*Redacted - figures re profitability, commercially sensitive information*]
2022	[*Redacted – information obtained via a subscription –*	[*Redacted – information obtained via a subscription –*	[*Redacted – information obtained via a subscription –*	[*Redacted – information obtained via a subscription –*	[*Redacted - figures re profitability, commercially sensitive information*]

	redacted on basis of 3rd party IP licensing]	redacted on basis of 3rd party IP licensing]	redacted on basis of 3rd party IP licensing]	redacted on basis of 3rd party IP licensing]	
2023	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted - figures re profitability, commercially sensitive information]*
2024	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted - figures re profitability, commercially sensitive information]*
2025	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing]*	*[Redacted - figures re profitability, commercially sensitive information]*

Source: Domestic Industry and [Redacted – third party industry expert report]

- The graph below plots the domestic industry shares[15] and NOPAT margins, in a 6-month moving average, from 2021 to 2025; margins are represented by the blue curve and projected in the secondary axis. The trajectories are quite **parallel**, and there are two breaking points, represented by the vertical dashed lines; in nov/22, the shares [*Redacted – Information concern Domestic Industry's financial situation during the period of analysis – Redacted as commercially sensitive*]

Figure: Monthly NOPAT margins and domestic industry shares Index– 6-month moving average



Source: Domestic Industry and HMRC

Third, relevant evidence specifically connects (iii) to (ii) and (ii) to (i).

[15] Domestic Industry sales / (Imports + Domestic Industry sales)

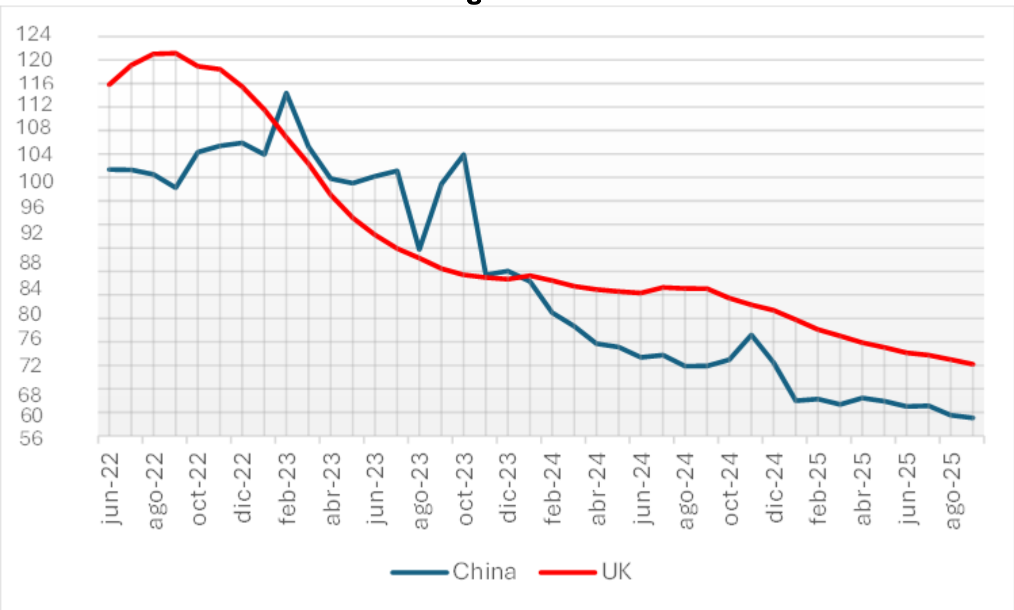
Concerning capacity and the import surge:

- Capacity expansion exceeded demand growth [*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*], thereby demonstrating both the materiality of the event and its ability to affect equilibrium allocations in the UK market.

- From P4 to P5, around 80% of the increase in imports can be attributed to Asian sources more directly affected by capacity expansion, demonstrating at the level of trade flows that this additional capacity ultimately entered the UK market.

Prices are also a relevant in demonstrating the clear link between the import surge and injury. The table below shows deflated 6-month moving averages of domestic industry prices and import prices from China. The trajectories are quite parallel, indicating interdependence and the presence of a causal link.

Figure: China imports prices and domestic industry prices Index – 6-month Moving Average – deflated



Source: Domestic Industry and HMRC

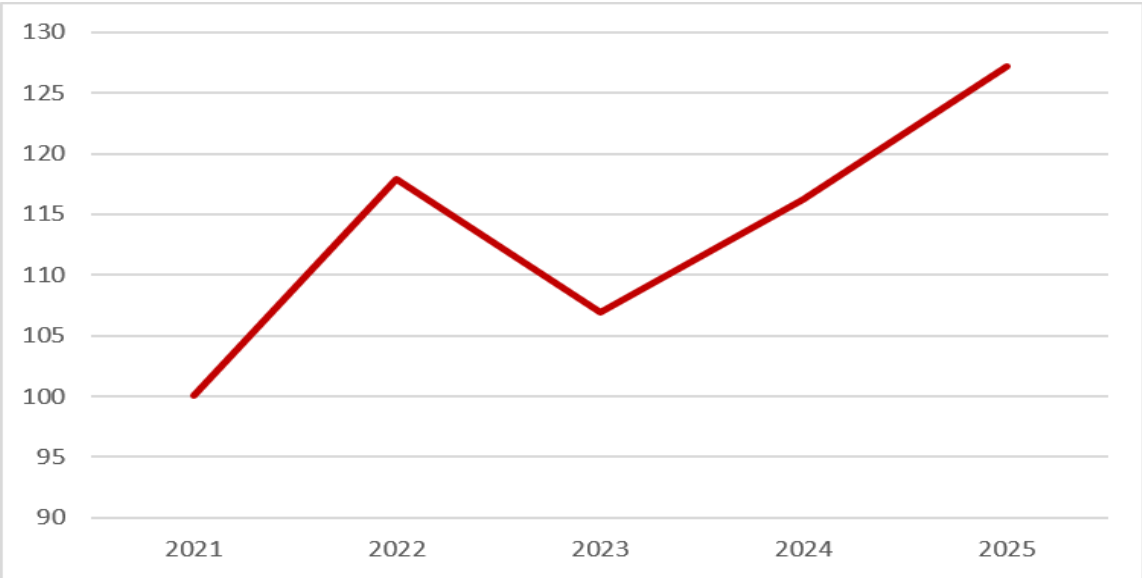
Finally, no non-attribution factor was identified that could provide even a minimally substantive partial explanation for the observed pattern. Domestic demand [*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]% over the period.

Appendix reference:

40. Has there been a contraction in demand for your product or has there been a change in consumption patterns?

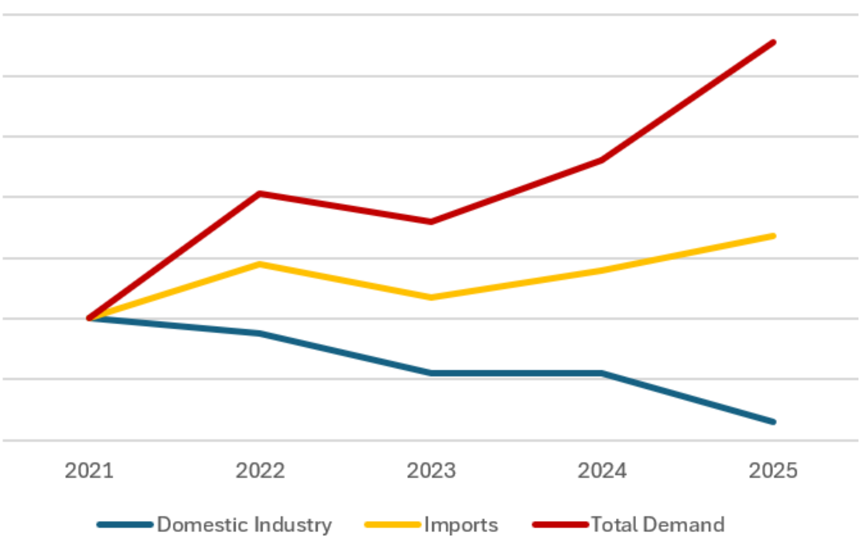
As thoroughly discussed in item 30, the demand for the object product (not considering the internal sales of rPET) increased in the period of injury. The graph below plots the annual demand from 2021 to 2025. [*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive.*]

Figure: Index of Internal demand for the object product



Source: Domestic Industry and * Import data available up to nov/25 and Domestic Industry's sales up to sep/25; for 2025, thus, total values are projected through linear extrapolation.

The reduction of the Domestic Industry sales cannot be attributed to demand contraction. The graph below, presents the evolution of demand, imports and Domestic Industry sales in index numbers, and illustrates the market dynamics; the imports captured not only the market growth, but also more than one third of Domestic industry sales, and with this conjunction, nearly doubled in the period of injury.



Source: Domestic industry and HMRC * Import data available up to nov/25 and Domestic industry sales up to sep/25; for 2025, thus, total values are projected through linear extrapolation.

As detailed in item 30, had the domestic production and imports captured equal shares of market growth, domestic industry sales would be [*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*] higher between 2022 and 2025.

Appendix reference: NA

41. Indicate the technology developments that have taken place since you last updated your manufacturing process.

It is correct to say that the core traditional production technology, relying upon direct esterification of PTA and MEG, is still active. However, there are ongoing advancements, focused on energy efficiency and integration of sustainable feedstock[16], which, however, as of now, do not seem to substantively alter the market equilibrium.

Appendix reference: NA

42. Comment on your productivity compared to that of the exporters.

We understand there is no relevant technical advantage held by exporters that could justify the patterns herein demonstrated.

Appendix reference: NA

43. Any other relevant factors including other factors which may have contributed to any injury suffered.

As thoroughly demonstrated herein, we understand the surge of imports triggered by unexpected capacity additions is the only identifiable driver of injury, with no other non-attribution factors seeming to have contributed substantively to the scenario of loss of shares, revenue and profits herein presented.

Appendix reference: NA

Remedy sought

The TRA must determine the relevant remedy which it is satisfied is necessary to prevent or remove serious injury to UK producers of the like goods and directly competitive goods.

44. Please provide specific reasons why you believe that a definitive safeguard remedy is required.

As demonstrated in this submission, normative requirements for the imposition of a safeguard measure are fully met, as well as the extreme urgency and necessity to impose the measure.

Under WTO law, a safeguard measure must satisfy the following cumulative requirements: (1) unforeseen developments; (2) there must be increased imports, in absolute terms or relative to domestic production, as required by Article 2.1 of the Agreement on Safeguards; (3) the domestic industry producing the like or directly competitive product must suffer serious injury or face a threat of serious injury, within the meaning of Articles 2.1 and 4.1 of the Agreement on Safeguards; (4) it must be demonstrated, on the basis of objective evidence, a causal link between the increased imports and the serious injury or threat thereof, and must also comply with the non-attribution requirement in Article 4.2(b).

All such facts were duly demonstrated throughout this submission:

[16] For instance, microreactors, reducing energy usage, optimization of water usage through closed-loop cooling systems and

the use of advanced catalysts (e.g, antimony).

(1) **Unforeseen capacity additions:** Annual growth rates for capacities in the relevant geographies (World, Asia and China) for 2018-21 were between [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*]; for 2022-2025, they peaked at more than [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] a year, in a structural break in the capacity trajectories. The actual increase in capacity was [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] of the total capacities in 2025 for such geographies were attributable to unforeseen additions.

(2) **Import surge:** Imports almost doubled from 2021 to 2025.

(3) **Injury**:

(a) Margins: In 2021 and 2022, Domestic Industry margins were [*Redacted – Information concern Domestic Industry's financial situation during the period of analysis – Redacted as commercially sensitive*];

(b) Prices: From 2022 to 2025, Domestic Industry prices is [*Redacted – Information concern Domestic Industry's financial situation during the period of analysis – Redacted as commercially sensitive*] than in 2022;

(c) Volumes and shares: Domestic Industry sales [*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]% in the period, while imports almost doubled. As a result, Domestic Industry shares were [*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]%.

(4) **Causality**:

(a) simultaneity of the events, demonstrated by the parallel evolution of margins (injury) and market shares (import surge) and, second, the parallel evolution of margins and market shares alongside installed capacity in Asia and globally;

(b) Capacity expansion exceeded [*Redacted – information obtained via a subscription – redacted on basis of 3rd party IP licensing*] Mt, equivalent to approximately [*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*] times UK demand and [*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*] times the increase in import volumes, thereby demonstrating both the materiality of the event and its ability to affect equilibrium allocations in the UK market;

(c) From P4 to P5, around 80% of the increase in imports can be attributed to Asian sources more directly affected by capacity expansion;

(d) price parallelism; and

(e) no non-attribution factor was identified that could provide even a minimally substantive partial explanation for the observed pattern. In particular, domestic demand increased by [*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*]% over the period.

The above elements persuasively establish that the UK industry requires safeguard measures to prevent or remedy serious injury and facilitate adjustment to market conditions.

Appendix reference: NA

45. Please confirm if you are seeking a provisional remedy. If so, provide
    a) Specific reasons for requesting a provisional remedy;
    b) Information as to why a delay in taking action would cause damage to UK producers which would be difficult to repair; and
    c) the level of tariff increase requested as the remedy.

As fully demonstrated in this submission, the sharp increase in imports into the UK market constitutes an unforeseen development arising from the significant overcapacity of Asian PET producers, which has fueled a surge in export volumes worldwide, including to the United Kingdom. The rapid expansion of these imports is displacing sales previously held by the Domestic Industry and exerting strong price-suppressing effects. This has resulted in a substantial loss of market share for the Domestic Industry, alongside a persistent decline in domestic prices, [*Redacted – Information concern Domestic Industry's pricing during the period of analysis – Redacted as commercially sensitive*].

[*Redacted – Information concern Domestic Industry's financial situation during the period of analysis – Redacted as commercially sensitive*].

Given the speed of import penetration, the scale of the Domestic Industry's market, sales, price, and profitability decline, the announced additional capacity expansions by Asian producers and the possibility of trade diversion due to trade remedies imposed in other jurisdictions (please refer to question 38), the imposition of provisional measures is necessary and urgent. Immediate action is required to stabilize the market, prevent further injury during the investigation, and allow the Domestic Industry to compete under fair and undistorted conditions while the UK authorities complete their assessment.

As such, the Applicant respectfully submits that the safeguard measures should take the form of import duties which are sufficient to offset the serious injury suffered by the domestic UK industry and requests import duties of at least 90% to offset the decline in domestic price. Please see further information in Appendix 2 regarding this.

Appendix reference: Appendix 2

General

46. Indicate efforts taken or planned to compete with the imports.

As the data herein provided indicates, the domestic industry, under the new global market supply/demand equilibrium, tried to respond to the import surge and increased global capacities by undercutting its own prices, having operated in the last three years with negative operational margins. The [*Redacted – Information concern Domestic Industry's pricing during the period of analysis – Redacted as commercially sensitive*] aimed at preserving volumes, which was not successfully carried through, given that from 2021 to 2025 the market shares of Domestic Industry went from [*Redacted – Information concern Domestic Industry's sales – Redacted as commercially sensitive*].

In this context, the requested measure is necessary, given that there is no further room for price [*Redacted – Information concern Domestic Industry's pricing during the period of*

analysis – Redacted as commercially sensitive] by the domestic industry, under [*Redacted – Information concern Domestic Industry's financial situation during the period of analysis – Redacted as commercially sensitive*] and halved volumes. Mainly the origins with highly increased capacities export the object product at prices that cannot be matched by the domestic industry, even at an [*Redacted – Information concern Domestic Industry's financial situation during the period of analysis – Redacted as commercially sensitive*]. The most relevant example is China; while domestic industry prices in 2025 were [*Redacted – commercially sensitive information concerning Domestic Industry pricing*] [17], [*Redacted – Information concern Domestic Industry's pricing during the period of analysis – Redacted as commercially sensitive*]; for matching Chinese prices, the domestic industry would have to work at [*Redacted – Information concern Domestic Industry's financial situation during the period of analysis – Redacted as commercially sensitive*].

Appendix reference: NA

47. Provide any other evidence you wish to bring to TRA's attention.

Additional Considerations Relevant to the TRA's Analysis The Domestic Industry has presented all the facts deemed relevant for analysis of its request, and remains at the disposal of the Trade Remedies Authority ("TRA") for any additional clarification or supplementary information that may assist the investigation. **The UK PET Industry Is Experiencing Sustained and Severe Injury** The Domestic Industry respectfully emphasises that the injury currently experienced by the UK PET sector reflects not temporary market fluctuations, but sustained and severe market distortion associated with structural excess capacity and persistent low-priced import pressure. Since at least 2022, UK PET prices and profitability have moved contrary to broader inflationary trends observed across the UK economy. While downstream consumer prices generally increased between 2022 and 2025, including elevated UK consumer price inflation levels reaching as high as 11.1% in 2022 and remaining above the Bank of England's 2% target throughout much of the 2023–2025 period[18], domestic PET prices and margins deteriorated significantly due to persistent low-priced import pressure This prolonged disconnect has resulted in sustained financial losses, erosion of profitability, under-utilisation of production capacity, and increasing risk of irreversible loss of domestic manufacturing capability. <u>The Domestic Industry submits that the scale and duration of the injury cannot be remedied through limited or symbolic measures. A safeguard remedy must therefore be necessary to restore commercially sustainable market conditions and prevent further deterioration of the UK PET industry</u>. **The Requested Measure Would Have Negligible Impact on Consumer Prices**

[17] Average CIF prices of [*Redacted – Information concern Domestic Industry's financial situation during the period of analysis – Redacted as commercially sensitive*], plus a 6% import duty rate.

[18] UK consumer price inflation peaked at 11.1% in October 2022, the highest level in over 40 years, and remained above the Bank of England's 2% target through much of the 2022-2025 period. See UK House of Commons Library, Economic update: Why has inflation gone up in 2025?, Insight, published 29 September 2025, available at: House of Commons Library article. https://commonslibrary.parliament.uk/economic-update-why-has-inflation-gone-up-in-2025

The requested safeguard measure would have only a negligible impact on downstream consumer prices in the United Kingdom. PET represents only a very limited proportion of the final retail price of packaged beverages and consumer goods. Internal industry analysis indicates that PET typically accounts for approximately 1–5% of the retail price of carbonated soft drink bottles and approximately 3–10% of the retail price of bottled water products in the UK market.

For example, based on a 600 mL carbonated soft drink bottle with an approximate resin weight of 21.5 grams, PET represents roughly 1% of the final retail price in the United Kingdom. Similarly, for a 1.5 L bottled water product using approximately 35 grams of PET, PET accounts for only around 2% of the retail shelf price. These figures demonstrate that even meaningful changes in PET resin pricing would translate into only marginal effects at the consumer level.

This conclusion is consistent with statements made by downstream brand owners themselves. Coca-Cola CEO James Quincey stated that "packaging is only a small component of the total cost structure."[19] The evidence therefore confirms that concerns regarding inflationary effects arising from safeguard measures are materially overstated.

Domestic PET Production Is Strategically Important to the United Kingdom

The Domestic Industry further submits that any limited increase in packaging costs must be balanced against the substantially greater economic and strategic consequences associated with the loss of domestic UK PET manufacturing capability. A viable UK PET industry contributes to supply chain resilience, operational security, domestic recycling capability, and investment across the wider manufacturing and packaging value chain. PET remains a critical material used in beverage and food packaging, medical and hygiene applications, and polyester fibres used in textiles and industrial products.

The COVID-19 pandemic further demonstrated the importance of resilient domestic supply chains for essential packaging materials and healthcare-related applications. Excessive dependence on imports originating from regions characterised by structural excess capacity and distorted pricing practices creates long-term vulnerability for the UK market and increases exposure to external supply disruptions.

Maintaining domestic PET production and recycling capability is also aligned with the United Kingdom's broader circular economy and sustainability objectives. A healthy domestic PET industry supports the collection, reuse, and processing of post-consumer PET waste within the UK market, strengthening domestic recycling systems and reducing dependence on externally sourced material.

Meaningful Safeguard Relief Is Necessary to Prevent Irreversible Harm

Without meaningful safeguard relief, the UK PET industry risks a capacity closure and irreversible loss of domestic production capability. The Domestic Industry therefore submits that a safeguard measure at a level sufficient to restore fair competition and commercially sustainable conditions, including a measure in the range requested in this application, is necessary to allow UK producers to stabilise operations, preserve employment, support reinvestment, and maintain long-term supply resilience.

Appendix reference: NA

[19] Megan Cerullo, "Coca-Cola says it may use more plastic bottles if Trump tariffs on aluminum take effect", CBS News, published 11 February 2025.

https://www.cbsnews.com/news/coca-cola-aluminum-tariffs-plastic-bottles/

Declaration

This application is made by, or on behalf of, a UK industry that produces like goods to those that are the subject of this application.

This UK industry has at least 1% market share of the market for like goods and directly competitive goods for consumption in the United Kingdom (whether produced there or elsewhere), taking into account the goods and particular market for those goods.

This application has the support of that UK industry for the purposes of the Regulations: specifically, producer support for this application is greater than producer opposition and represents at least 25% of all UK production of the like goods.

The information contained in this application is accurate and complete, based on the evidence reasonably available to the applicant.

Name:	[*Redacted - Personal Information*]
Company/Association:	Baker & Mckenzie LLP
Position:	Senior Associate
Company Registration number (if applicable):	
Date:	18 June 2026
Signature:	x Baker & Mckenzie LLP