



Registration form for interested parties and contributors

Case No.: AD0091

Anti-dumping investigation

Linear Low Density Polyethylene (LLDPE) originating from the United States of America (US)

Completed on behalf of (provide the name of your company):	This registration form is submitted on behalf of the following legal entities that are producers of LLDPE in the US: 1/ ExxonMobil Product Solutions Company, a division of Exxon Mobil Corporation (hereafter “EMPSC”) 2/ ExxonMobil Oil Corporation (hereafter “EMOC”) 3/ Gulf Coast Growth Ventures LLC (hereafter “GCGV”) (*) EMPSC, EMOC and GCGV are hereafter referred to as “EM Producers” or “Respondents”. (*) GCGV is a joint-venture between ExxonMobil Chemical Gulf Coast Investments LLC and Sabic US Projects LLC, [CONFIDENTIAL – business confidential information related to shareholding structure]. [CONFIDENTIAL – business confidential information concerning details of the shareholding structure and selling arrangements of GCGV].
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(to note, we use the term “company” to include all forms of business organisation including partnerships and sole traders)

Please note that the information provided herein sets out Respondents’ best understanding at the time of writing, based on information available at this stage. Respondents reserve their right to update and/or expand the information in future stages of the investigation as appropriate.



For full transparency, the Respondents wish to provide the following general comments on the data included in the registration form for the TRA's consideration:

- Sales values reflect net revenue (= gross revenue minus rebates and discounts).
- USD amounts were converted to £ using the following exchange rates: The 2025 exchange rate applied is the simple average of the twelve monthly rates published by HMRC on the UK Trade Tariff service for that calendar year. (https://www.trade-tariff.service.gov.uk/exchange_rates/monthly?year=2025)
- Sales were attributed to a given year using the "Goods Issued" date in ExxonMobil's systems.
 - [CONFIDENTIAL – business sensitive information related to ExxonMobil's Goods Issue date and other confidential details related to the selling arrangements of the goods concerned].

Note:

Please provide **two copies of your response to this form**: a **confidential** and a **non-confidential version**. Both copies must be returned to the TRA using the Trade Remedies Service (www.trade-remedies.service.gov.uk).

When you have completed each form, indicate the **confidentiality** status of the document by placing an ☐ in the relevant box below and in the header of the form. We strongly recommend this questionnaire be completed on a computer, so this step is easy to complete.

- ☐ Confidential
☒ Non-confidential (will be made available on the [public file](#).)

Deadline for response:	16 July 2026
Case team contact:	AD0091@traderemedies.gov.uk



Introduction

Registration of interest to the investigation

We invite interested parties and contributors to **register** their interest in this investigation **by completing the relevant sections** as indicated in this form **and submitting the completed form** using the Trade Remedies Service (www.trade-remedies.service.gov.uk).

An interested party is either:

- a government of the foreign country or territory subject to the investigation;
- an overseas exporter, an overseas producer or a domestic importer of the goods subject to the investigation;
- a UK producer of goods that are like the goods subject to the investigation; or
- a trade or business association representing one or more of the above parties.

A contributor is a person or company who is not an interested party but who wants to register so that they can participate in an investigation.

Scope of the investigation

Goods concerned	Linear Low-Density Polyethylene (LLDPE)
Period of investigation (POI)	1 January 2025 to 31 December 2025
Injury Period	1 January 2022 to 31 December 2025
Country goods originating from	United States of America (US)

For further details, please refer to the *Notice of Initiation* on the public file: [Trade Remedies Authority](#).

Completing this registration form and pre-sampling questionnaire

To register to this case, you need to provide two copies of your response to this form: a confidential and a non-confidential version. Your non-confidential version should be as similar as possible to your confidential version except for the redaction of the confidential information.

Both copies must be returned to the TRA by **16 July 2026** using the Trade Remedies Service (www.trade-remedies.service.gov.uk).



We would like to make you aware that if the information we have requested is not supplied within a reasonable time, the TRA will be free to make determinations on the basis of the facts available.

The non-confidential version of your registration form and pre-sampling questionnaire may be placed on the public file: [Trade Remedies Authority](#).

It is your responsibility to ensure that the non-confidential version does not contain any confidential information, which includes personal contact information, names and signatures. Please see the [TRA's public guidance](#)¹ for further information on providing confidential information and non-confidential summaries.

All information provided to the TRA in confidence will be treated as confidential in accordance with regulation 45 of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 (the Regulations) and will not be disclosed (except in limited circumstance as permitted by regulation 46 of the Regulations) and will be stored in protected systems.

Request to complete a detailed questionnaire

If, on the basis of the information provided in this form, we determine that you are an overseas exporter or an importer of the goods subject to the investigation, or a UK producer of goods that are like the goods subject to the investigation, or another interested party (other than the Government of the US) or a contributor, we will ask you to complete a detailed questionnaire to inform this investigation.

If we consider it appropriate, we may only ask a sample of overseas exporters, importers and/or UK producers to complete a detailed questionnaire. By submitting this completed registration form and pre-sampling questionnaire, you agree that you may be included in any such sample.

If your company is included in the sample, you will be asked to respond to the questions in the detailed questionnaire and to support the TRA in verifying your responses. This may involve the TRA carrying out a verification visit to your premises.

If you are an overseas exporter and indicate that you do not agree to possible inclusion in a sample, your company may be deemed not to have cooperated in the investigation. The TRA will base its findings for non-cooperating parties on facts available. This may result in an outcome that is less favourable to your company than if it had cooperated.

If we decide to sample overseas exporters, and your company is not selected for this sample, you may submit a request to us to calculate individual margins for your company. We will accept your request providing that:

- you submit the required information on time; and

¹ <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/the-tras-investigation-process>



- the number of exporters subject to examination is not so large that complying with the request would be unduly burdensome and risk preventing the timely completion of the investigation.

If information is not supplied within a reasonable time, the TRA may make determinations on the basis of the facts available.

Section A: About your company

A1. Your company's activities

1. To determine your company's role for the purpose of this investigation, please select the most applicable option for your company. Please refer to the period of investigation (POI) defined on page 2.

Overseas producers and exporters

- ☒ [A1.1] During the POI, we both produced and directly/indirectly exported the goods concerned from the US to the UK.

Note: Please complete sections A2, A3, and B.

- ☐ [A1.2] During the POI, we produced the goods concerned in the US, but did not export to the UK.

Note: Please complete sections A2 and B.

- ☐ [A1.3] During the POI, we directly/indirectly exported the goods concerned from the US to the UK, but did not produce the goods concerned.

Note: Please complete sections A3 and B.

UK producers and importers

- ☐ [A1.4] During the POI, we produced goods that are like the goods concerned in the UK and imported the goods concerned originating from the US to the UK.

Note: Please complete sections A4, A5, and B.

- ☐ [A1.5] During the POI, we produced goods that are like the goods concerned in the UK (i.e. the UK like goods), but we did not import the goods concerned from the US, but imported like goods from another country.

Note: Please complete sections A4, A5 and B.

- ☐ [A1.6] During the POI, we imported the goods concerned originating in the US to the UK, but we did not produce the goods that are like the goods concerned (the UK like goods).

Note: Please complete sections A5 and B.

Other

- ☐ [A1.7] Other.



Note: Please complete section B.

2. If you selected 'Other' [A1.7], please describe the activity/activities of your company and your company's interest in this investigation in the field below.

Not applicable.

3. Indicate whether your company is a member of any representative organisations (e.g. a trade body or chamber of commerce). If so, provide a copy of any relevant documentation.

To the best of our knowledge, the EM Producers are not a member of any representative organizations based in the UK.

A2. Production and domestic sales of the goods concerned

Complete this section if you indicated under **A1** that **you are a producer of the goods concerned in the US**.

4. Please refer to the description of the goods concerned on page 2. In the field below, describe the goods that you produce and that fall within the description.

EM Producers manufacture both LLDPE for standard film applications as well as LLDPE for higher-performance packaging films requiring enhanced toughness, puncture resistance, stiffness etc.

5. Please provide your company's total production volumes and production capacity for the goods concerned (LLDPE) during the period of investigation (POI) in the table below.

The overview below sets out the production volumes and capacity for LLDPE for each of the EM Producers in the US.



Total production volume (POI) mt	EMPSC: [0-5,000,000] mt EMOC: [0-3,000,000] mt GCGV: [0-1,000,000] mt
Total production capacity (POI) mt	EMPSC: [0-5,000,000] mt EMOC: [0-3,000,000] mt GCGV: [0-1,000,000] mt

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our [guidance](#).

6. Please provide details of how your production volume and capacity (for LLDPE) has changed over the injury period:

Preliminary remark: the headings of the table all show the period from January 2022 to December 2023. We have assumed that the intent was to refer to 2022, 2023 and 2024.

The table below reflects the production volumes and capacity evolution for LLDPE for each of the EM Producers in the US.

	January 2022- December 2023	January 2022- December 2023	January 2022- December 2023
Total production volume mt	2022: GCGV: [0-1,000,000] mt EMOC: [0-3,000,000] mt EMPSC: [0-5,000,000] mt	2023: GCGV: [0-1,000,000] mt EMOC: [0-3,000,000] mt EMPSC: [0- 5,000,000] mt	2024: GCGV: [0-1,000,000] mt EMOC: [0-3,000,000] mt EMPSC: [0-5,000,000] mt
Total production capacity mt	2022: GCGV: [0-1,000,000] mt EMOC: [0-3,000,000] mt EMPSC: [0-5,000,000] mt	2023: GCGV: [0-1,000,000] mt EMOC: [0-3,000,000] mt EMPSC: [0- 5,000,000] mt	2024: GCGV: [0-1,000,000] mt EMOC: [0-3,000,000] mt EMPSC: [0-5,000,000] mt

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our [guidance](#).

7. Please provide details of finished stock of the goods concerned (LLDPE)

Preliminary remark: the headings of the table all show the period from January 2022 to December 2023. We have assumed that the intent was to refer to 2022, 2023, 2024 and 2025.



	January 2022- December 2023	January 2022- December 2023	January 2022- December 2023	January 2022- December 2023
Total finished stock volume mt	2022: EMPSC: [0- 500,000] mt EMOC: [0-5,000] mt GCGV: [0-2,000] mt	2023: EMPSC: [0- 500,000] mt EMOC: [0-5,000] mt GCGV: [0-2,000]mt	2024: EMPSC: [0- 500,000] mt EMOC: [0-5,000] mt GCGV: [0-2,000]mt	2025: EMPSC: [0- 500,000] mt EMOC: [0-5,000] mt GCGV: [0-2,000]mt

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our [guidance](#)

8. Please give details of all associated parties involved with the company in the production and sales (export and/or domestic) of the goods concerned during the period of investigation. Both natural persons (individuals) and legal persons (e.g. companies) are considered to be associated where they meet the definition of 'Related Persons' in [regulation 128 of the Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#).

Company name	Company location (city, country)	Activities	Relationship	Contact details (if available)
ExxonMobil Chemical Services Americas Inc (hereafter "EMCSA")	Spring, Texas, US	Domestic seller, related exporter	ExxonMobil affiliate	[CONFIDENTIAL – personal information omitted]
Canada Imperial Oil Ltd (hereafter "CIOL")	Calgary, Canada	Domestic seller	ExxonMobil affiliate	[CONFIDENTIAL – personal information omitted]
ExxonMobil Petrochemicals Marketing FZCO (hereafter "EMPM")	Jebel Ali Freezone, Dubai, United Arab Emirates	Related exporter	ExxonMobil affiliate	[CONFIDENTIAL – personal information omitted]
ExxonMobil Petroleum & Chemical BV (hereafter "EMPC") (*)	Antwerp, Belgium	Related exporter	ExxonMobil affiliate	[CONFIDENTIAL – personal information omitted]

(*) [CONFIDENTIAL- business sensitive information related to UK sales channels which is not susceptible to a meaningful summary].



Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with our [guidance](#).

9. If you do not export the goods concerned to the UK either directly or via associated parties, please describe how your products are exported to the UK (e.g. via unrelated wholesalers).

[CONFIDENTIAL – information related to nature of sales channels of the goods concerned to the UK].

10. Please provide the total of your domestic sales volumes and sales values of the goods concerned produced by your company during the POI in the table below.

Total domestic sales volume (POI) mt	EMOC: mt / [0-1,000,000] EMPSC: mt / [0-500,000] GCGV: mt/ [0-500,000] Total: mt / [0-1,500,000]
Total domestic sales value (POI) (£)	EMOC: £/ [0-1,000,000,000] EMPSC: £/ [0-500,000,000] GCGV: £/ [0-100,000,000] Total: £/ [0-1,000,000,000]

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our [guidance](#).

11. Were there significant fluctuations in major input costs (such as raw materials or energy) across the POI, which had a material impact on the overall cost to make of the goods? If yes, please provide details of these fluctuations.

The Respondents have observed certain fluctuations in raw material and energy costs across the POI, particularly in relation to weather conditions; these fluctuations may have affected the overall costs of the goods concerned, although the degree of material impact cannot be determined with certainty at this stage. The Respondents will provide further detailed information and evidence for the TRA to determine whether such fluctuations were of a significant nature and had a material impact on the cost of manufacturing of the goods concerned in the course of the investigation.



12. Is your company, or any of your associated parties, related to any company in the UK, particularly any of the UK producers and/or importers of the goods that are like the goods concerned (the UK like goods)?

No. Neither the respondents, nor the related parties identified in the response to question 8, are related to any company in the UK producing or importing the goods that are like the goods concerned.

13. Please provide any details of other goods you produce and/or sell for the UK market, other than the goods concerned.

The following details are available at this stage in relation to other products that are produced and/or sold to the UK market by the Respondents:

EMPSC: [CONFIDENTIAL];
EMOC: [CONFIDENTIAL];
GCGV: [CONFIDENTIAL].

A3. Direct and indirect exports of the goods concerned

Complete this section if you indicated under A1 that **you are an exporter of the goods concerned from the US**.

14. If you are not the producer of the goods concerned that you export to the UK, please provide details for your suppliers of the goods concerned and indicate whether these are the producers of the goods concerned in the table below.

Not applicable.

Company name	Company location (city, country)	Relationship to your company	Producer (Y/N)	Contact details (if available)

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with our [guidance](#).

15. Please provide the total of your direct and indirect export volumes and export values of the goods concerned to the UK during the POI in the table below.



Note: Exports to the UK via a third party (whether or not associated to your company), which is located in the US or a third country, are to be considered indirect exports. If you are unable to determine the types of LLDPE, please provide the total volumes and indicate estimated proportions of each LLDPE.

	C4 LLDPE	C6 LLDPE	C8 LLDPE	Total LLDPE
Total direct export volume (POI) mt	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]
Total indirect export volume (POI) mt	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]
Total direct export value (POI) (£)	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]
Total indirect export value (POI) (£)	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our [guidance](#).

16. If you exported the goods concerned to the UK via third parties, please provide details for these parties below.

Company name	Company location (city, country)	Activities	Relationship	Contact details (if available)
ExxonMobil Chemical Services Americas Inc (hereafter "EMCSA")	Spring, Texas, US	Domestic seller, related exporter	ExxonMobil affiliate	[CONFIDENTIAL – personal information omitted]
ExxonMobil Petrochemicals Marketing FZCO (hereafter "EMPM")	Jebel Ali Freezone, Dubai, United Arab Emirates	Related exporter	ExxonMobil affiliate	[CONFIDENTIAL – personal information omitted]



ExxonMobil Petroleum & Chemical BV (hereafter "EMPC") (*)	Antwerp, Belgium	Related exporter	ExxonMobil affiliate	[CONFIDENTIAL – personal information omitted]
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Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with our [guidance](#).

(*) [CONFIDENTIAL- business sensitive information related to UK sales channels which is not susceptible to a meaningful summary].

17. Please provide details of the commodity code(s) you export the goods concerned to the UK under in the box below. For each commodity code listed please provide detail/ a brief description of the good shipped under that code, including if it is C4, C6, C8 or another type of LLDPE.

UK Commodity code	Description
3901101090	Metallocene C6LLDPE
3901400090	C4LLDPE
3901400090	C6LLDPE
3901400090	Metallocene C6LLDPE

A4. Production and sales of goods produced in the UK that are like the goods concerned

Not applicable.

Complete this section if you indicated under **A1** that **you are a producer in the United Kingdom of goods that are like the goods concerned** (the UK like goods).

18. Please describe the goods that you produce in the UK and that you consider to be like the goods concerned (the UK like goods).

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19. Please provide your company's total production volumes and production capacity for UK production of goods that are like the goods concerned (the UK like goods) during the POI in the table below. If possible, please split these by specific types of LLDPE e.g. C4, C6 and C8.



Total production volume (POI) mt	
Total production capacity (POI) mt	

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our [guidance](#).

20. Please provide the total of your domestic and export sales volumes and sales values of the goods that are like the goods concerned (the UK like goods) produced by your company in the UK during the POI in the table below. If possible, please split these by specific types of LLDPE e.g. C4, C6 and C8.

Total domestic sales volume (POI) mt	
Total domestic sales value (POI) (£)	
Total export sales volume (POI) mt	
Total export sales value (POI) (£)	

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our [guidance](#).

21. Were there significant fluctuations in major input costs (such as raw materials or energy) across the POI, which had a material impact on the overall cost to make of the goods that are like the goods concerned (the UK like goods)? If yes, please provide details of these fluctuations.

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22. Do you produce and/or sell other goods for the UK market other than the goods that are like the goods concerned (the UK like goods)?

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A5. UK imports of the goods concerned

Complete this section if you indicated under **A1** that **you are an importer of the goods concerned from the US**.

23. Please provide the total of your import volumes and import values of the goods concerned originating from the US to the UK during the POI in the table below.



Please note that generally ExxonMobil [CONFIDENTIAL – business sensitive information]. Therefore, the volumes shown below produced by some of the Respondents for import to the UK are [CONFIDENTIAL].

	C4 LLDPE	C6 LLDPE	C8 LLPDE	Total LLDPE
Total import volume (POI) mt	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]
Total import value (POI) (£)	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]	[CONFIDENTIAL]

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our [guidance](#).

24. Please provide the total of your import volumes and import values of the goods concerned from you three largest destinations by volume to the UK during the POI in the table below.

ExxonMobil has [CONFIDENTIAL – business sensitive information].

Country 1	Country name:
Total import volume (POI) mt	
Total import value (POI) (£)	
Country 2	Country name:
Total import volume (POI) mt	
Total import value (POI) (£)	
Country 3	Country name:
Total import volume (POI) mt	
Total import value (POI) (£)	

Consider providing these figures in ranges in your non-confidential version of this form, in accordance with our [guidance](#).

25. Please provide details for your suppliers of the goods concerned originating from US in the table below.



Company name	Company location (city, country)	Activities (producer, trader, etc.)	Relationship	Contact details (if available)
EMPSC	Spring, US	Producer	ExxonMobil affiliate	[CONFIDENTIAL – personal information omitted]
EMOC	Spring, Texas, US	Producer	ExxonMobil affiliate	[CONFIDENTIAL – personal information omitted]

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with our [guidance](#).

26. Please specify your purpose in importing the goods concerned from the US. Select **all** of the following options that are applicable to your company.

- ☒ We resell the goods unchanged to distributors or final customers.
- ☐ We process the goods before reselling them to distributors or final customers.
- ☐ We use the goods as input in our production of _____.
(specify the product/s).
- ☐ We re-export the good to third countries, namely _____
- ☐ Other.

27. If you selected "other", please specify your purpose for importing the goods concerned to review from the US in the field below.

Not applicable

28. Please describe how the goods concerned compare to UK produced goods that are like the goods concerned in the field below.

Please refer to our responses to questions 32 and 33.

Section B: Additional information



B1. Other known companies

We need contact information in order to notify all other known companies who may be interested in taking part in the investigation and making their views known.

B1.1 Exporters, importers, and UK producers

29. Please provide contact details of any other known exporters and importers of the goods concerned and UK producers of the goods that are like the goods concerned (the UK like goods) in the table below.

Activities (exporter / importer / UK producer)	Company name	Contact details (website/email/telephone)	Location(s) (if info is available)

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with our [guidance](#).

[CONFIDENTIAL – business sensitive information omitted. Identities of several known importers are provided to the TRA in confidence]

B1.2 Upstream and downstream companies

30. Please provide contact details for UK companies from whom you purchase materials used to make the like goods (upstream companies) and UK companies who purchase the like goods from you (downstream companies) to help us obtain a more complete picture of the potential effects of a measure.

You are not obligated to provide this information but we will use any details you provide to get in touch with these companies and improve our understanding of the impacts of any potential measure.

Activities (upstream / downstream)	Company name	Contact details (website/email/telephone)	Location(s) (if info is available)



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Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with our [guidance](#).

[CONFIDENTIAL – business sensitive information omitted. Identities of several known parties are provided to the TRA in confidence]

B1.3 Any other companies

31. Please provide a list of any other known companies, including the nature of their company and any associations with other companies.
This may include, for example, companies that are involved in the importation, distribution, or sale of goods that are like the goods concerned from third countries.

Please refer to our responses to previous questions.

B2. Scope

32. If you consider that the description of the goods concerned for the investigation should be varied, please specify the suggested changes and provide your reasons in the field below.

The Respondents note that the Notice of Initiation does not contain a clear definition of linear low-density polyethylene (LLDPE) based on objective characteristics.

Although the complaint submitted by INEOS contains a description of LLDPE, we consider that description in the Notice of Initiation is insufficiently precise to establish the product scope unambiguously. The lack of objective physical, technical or chemical characteristics expressly referred in the definition of the goods concerned in the Notice of Initiation introduces a high degree of uncertainty as to the precise boundaries of the product definition.

This is further exacerbated by the fact that the HS codes referred to in the Notice of Initiation cover a broader range of products that go beyond the LLDPE grades which are seemingly targeted by the present investigation, as they also include LDPE products. Classification under those HS codes alone is therefore not sufficient to determine whether a particular product falls within the rather wide and undefined scope of the goods concerned, as provided in the Notice of Initiation.

To avoid ambiguity and ensure a consistent product classification, the Respondents respectfully request that the definition of the goods concerned be clarified, notably by reducing the number of relevant HS codes and specifying the applicable density range to LLDPE products.



In this regard, the Notice of Initiation mentions a long number of HS codes which go beyond the goods concerned. In view of the respondents, only the relevant commodity codes for the classification of LLDPE should be included within the investigation.

The most commonly used HS subheading for LLDPE is 3901.10.10, together with the corresponding national tariff codes: 3901.10.10.20; 3901.10.10.50; 3901.10.10.60 and 3901.10.10.90. The other relevant HS subheading is 3901.40.00, including the following tariff codes: 3901400010; 3901400030; 3901400050; 3901400060 and 3901400090.

Subheading 3901.10.10 clearly refers to linear polyethylene, as indicated in the UK Combined Nomenclature. This classification is typically used for LLDPE grades containing more than 95% ethylene by weight. For LLDPE grades containing less than 95% ethylene, the classification generally falls under subheading 3901.40.00, which covers ethylene copolymers. Consequently, only these two HS subheadings should be considered when defining the scope of the investigation to ensure comprehensive coverage of all relevant LLDPE grades.

Moreover, non-LLDPE products may be classified under those commodity codes. For this reason, the description of the goods concerned should also specify the applicable density range of LLDPE.

In this regard, the Respondents submit that conventional LLDPE grades typically possess densities ranging from 0.91 to 0.94 g/cm³. This density range is considered appropriate to draw the lines between LLDPE and other similar out-of-scope products. Materials with densities above this range are generally classified as High-Density Polyethylene (HDPE), while materials with lower densities may be classified as Very Low-Density Polyethylene (VLDPE), Ultra-Low-Density Polyethylene (ULDPE) or plastomers.

To give a practical example of the relevance of these necessary product scope clarifications, [CONFIDENTIAL – business sensitive information removed]. Accordingly, [CONFIDENTIAL – business sensitive information removed].

The Respondents hereby request the investigating authority to limit the investigation scope to the aforementioned HS codes and density range only. In the absence of such a delimitation, the investigation would unduly target product types which, despite not being LLDPE, would find themselves under the scope of a broad and undefined product definition.

33. Please provide any further remarks relating to the goods concerned and the goods that are like the goods concerned (the UK like goods). Areas may include, for example: the interchangeability of different types and brands of LLDPE (e.g. C4, C6 and C8).



It is important to note that different LLDPE grades may have the same basic composition (ethylene, comonomer type, and catalyst family) yet exhibit significantly different properties. Accordingly, any comparability assessment should consider not only basic chemical composition and tariff classification, but also relevant technical and performance characteristics. Based on the above, the Respondents consider that there may be significant differences as regards the comparability of the goods concerned and the UK like goods, and will substantiate this point further in the course of the investigation.

B3. Product control numbers

The TRA uses product control numbers (PCNs) to define and distinguish the different types or subcategories of goods that fall under the goods description of the goods concerned. Subcategories are developed on the basis of differences in the physical and/or commercial characteristics of the goods which may impact the price at which each subcategory is sold.

PCNs, which come in the form of an alphanumeric code, help to create a categorisation system so that comparisons can be made between goods produced in the UK and those produced in the US.

We have created the following draft PCN table:

TYPE	CODE	DESCRIPTION
Type of polyethylene	P	Low Density Polyethylene (LDPE) (Out of scope)
	H	High Density Polyethylene (HDPE) and Ultra High Density Polyethylene (UHDPE) (Out of scope)
	L	Linear Low Density Polyethylene (LLDPE)
Number of co-monomers	C4	4 - Butene
	C6	6 – Hexene
	C8	8 – Octene
Catalyst	Zn	Ziegler-Nata catalysts
	Me	Metallocene catalysts
	Ot	Other



Production method	G	Gas Phase process
	L	Liquid Phase process
	S	Slurry Loop Phase process

34. Please review the above draft PCN structure for this investigation and comment in the field below whether the PCN structure is adequate and appropriate to categorise the goods produced, exported and/or imported by your company.

The Respondents question the need for inclusion of codes relating to products which their own description confirms they fall out of the scope of the definition of the goods concerned by the present investigation (i.e. “P” and “H”). Goods which fall out of the scope do not require to be included within the PCN table as their data should not be reported in the relevant questionnaires on a PCN level. For this reason, the first elements of “P” and “H” (referenced under “Type of polyethylene”) should be removed from the PCN structure altogether.

Moreover, the Respondents submit that the “L” code in the PCN structure (referenced under “Type of polyethylene”) described above does not adequately capture the relevant product characteristics and should therefore be removed also. In particular, since it refers to all types of LLDPE falling within scope, this criterion is redundant and does not introduce any differentiation reflecting differences affecting price and cost of the product.

The Respondents consider that the “Type of polyethylene” criterion should be amended so as to remove products which are clearly out of scope of the present investigation and, instead, reflect relevant differences concerning the density of the product.

35. Please provide details of any technical or physical characteristic not included in the PCN structure that may affect the price comparison between the goods concerned and the goods that are like the goods concerned (the UK like goods).

Please refer to our responses to questions 32-34.

36. If you are an overseas exporter or importer of the goods concerned or a UK producer of the goods that are like the goods concerned (the UK like goods), comment on whether the proposed PCN structure adequately aligns with your goods range. In particular, we would welcome your comments on:
- the categorisation of product features;



- the list of products included in the “other” category and whether this prevents a fair comparison between PCNs;
- whether you produce, or are aware of, any specialised products that fall within the definition of the goods concerned or the goods that are like the goods concerned (the UK like goods) which have a sufficiently different price point to make them unsuitable for comparison with the other sub-categories of the “goods concerned”; and
- do you export, produce or import any goods that could be categorised under more than one PCN? If so, please suggest any changes to the proposed PCN structure?

The Respondents’ product portfolio comprises products with different performance characteristics and value propositions designed to meet specific end-use and customer requirements. The value associated with these differentiated features is reflected in the respective price levels of the products. [CONFIDENTIAL – business sensitive information not publicly available removed]. For example, the Respondents’ [CONFIDENTIAL – business sensitive information not publicly available removed].

The Respondents refer to their responses to questions 32-34 above in relation to other relevant criteria to adequately reflect differences in the goods range and recommend to streamline the PCN composition.

37. Please provide details of any manufacturing process differences which you think may influence the PCN structure and the price comparison between the goods concerned or the goods that are like the goods concerned (the UK like goods).

The Respondents would like to reserve their rights to provide substantiated information on any possible differences in manufacturing processes which may affect price comparison in the course of the investigation.

For the time being, the Respondents wish to clarify that the term “Slurry Loop Phase process” should be amended so as to refer only to “Slurry Phase process”. This option would be preferable as it is more technology-neutral while in any case covering both slurry loop and slurry tank reactor systems.

At the same time, the reference to “Liquid Phase process” should be amended in order to refer to “Solution Phase process”, as that is the correct description of that relevant production method for LLDPE. “Liquid” and “solution” are not synonymous terms and using them interchangeably could create confusion.

B4. Other comments



38. Please use the field below to provide additional information that you consider relevant to this investigation.

At this stage, the Respondents do not have any additional comments.

Consider redacting this information in your non-confidential version of this form, in accordance with our [guidance](#).