



Pre-Sampling Questionnaire (Producer)
Transition review of anti-subsidy measures
Case TS0060: Polyethylene Terephthalate (PET)
originating in India

Period of Investigation:	01 January 2023 – 31 December 2023
Injury Period:	01 January 2020 – 31 December 2023
Deadline for response:	25 July 2024
Case team contact:	TS0060@traderemedies.gov.uk
Completed on behalf of:	Alpek Polyester UK Ltd

When you have completed this form, indicate the **confidentiality** status of this document by placing an X in the relevant box below and in the header. We strongly recommend this questionnaire to be completed electronically.

- Confidential
 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 must be returned to the TRA using the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **August 1 2024**.



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Instructions

The Trade Remedies Authority (TRA) will be carrying out a transition review of the EU trade remedy measure which will consider whether the subsidised imports of Polyethylene Terephthalate (PET) from India would be likely to continue or recur if the countervailing duty were no longer applied to those goods, and injury to the UK industry in the like goods would be likely to continue or recur if the countervailing duty were no longer applied to those goods.

Who should complete this form?

You should complete this form if you are a **UK producer** of the [like goods](#) (as defined on page 5) in this transition review.

Why you are being asked to complete this pre-sampling questionnaire?

We are seeking your cooperation as a **UK producer** of the **like goods** to inform our review of the existing countervailing measures against Polyethylene Terephthalate (PET) originating in India, and whether to vary (including extending the application of) or revoke the current measures.

If you are not a **UK producer**, please complete either relevant Pre-Sampling Questionnaire (PSQ) for importer or exporter. Alternatively, if you do not fit into any of these categories but have information that you wish to be considered during the investigation, you can complete the Other Interested Party and Contributor Registration Form.

This PSQ allows us to collect basic information and data about your company. It will also allow us to conduct preliminary analyses of the likelihood of importation of subsidised goods and injury continuing or recurring if either measure were to be revoked. If a large number of UK producers complete this PSQ, we will use the information provided to decide which companies to sample for further investigation. If you are sampled, we will send you a more detailed questionnaire to complete.

If we do not receive sufficient information in this PSQ or the detailed questionnaire (if requested to complete), we may be unable to use your information in the review and will have to rely on facts available to us.

Note about confidentiality

You will need to submit one confidential version **and** one non-confidential version of your PSQ by the due date, clearly marked either “Confidential” or “Non-confidential” in the header.



Your non-confidential version should be the same as your confidential submission, but with any confidential information redacted, including personal contact information, names and signatures.

Please see the TRA's [public guidance](#) for further information on what can be considered confidential and how to prepare a non-confidential version of this questionnaire.

All information provided to the TRA in confidence will be treated accordingly and only used for this investigation (except in limited circumstance as permitted by regulation 46 of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019). All information will be securely stored.

The non-confidential version of your submission will be placed on the public file, which is available on <https://www.trade-remedies.service.gov.uk/public/case/TS0060>.

Deadline for response

A completed PSQ (confidential and non-confidential versions) must be submitted to the TRA by no later than **August 1st, 2024**. If you are unable to provide a completed submission by the given due date and you wish to request an extension, please contact TS0060@traderemedies.gov.uk. Extensions will only be granted with reasonable justification provided, and for a maximum period of half the original completion period (i.e., five days extension in a 10-day registration period). The TRA's guidance on extension requests can be found [here](#).

The scope of this transition review

Goods subject to review

This transition review covers Polyethylene Terephthalate (PET) exported from India, described as:

Polyethylene terephthalate having a viscosity number of 78ml/g or higher, according to ISO Standard 1628-5.

These **goods** are currently classifiable within the UK's following commodity code(s):

39 07 61 00 10 39 07 61 00 90

These commodity codes are only given for information. The **goods** are defined by the current description.



In this pre-sampling questionnaire (PSQ), these **goods** will be referred to as the **goods subject to review** (identified by the goods description above, regardless of the commodity code under which they are exported).

To note: should you disagree with the description of the goods subject to review within the scope of this transition review, you can comment on this in section [C3 – Scope](#).

Like goods

In this PSQ, the ‘**like goods**’ is defined as goods that are produced in the UK or imported into the UK from a country other than India, and which are like the goods subject to review in all respects, or with characteristics closely resembling them.

This PSQ will ask for information about your company’s production, imports and sales of the like goods.

Recalculation in transition reviews

Please note that the TRA does not intend to assess whether it is necessary to recalculate the countervailing amounts in this transition review unless registered parties to the case provide compelling evidence that it may be appropriate to recalculate. If this is the case, please provide the information as part of this submission in section [C7 – Anything else](#).

Please follow the instructions for each question to provide the appropriate information regarding the goods subject to review or the like goods.

For more information, you may refer to the Notice of Initiation published at: <https://www.trade-remedies.service.gov.uk/public/case/TS0060>.



Section A – Activities of your company and any associated parties

A1 – Your company’s activities

To determine your company’s role for the purpose of this transition review, please select the activity/activities of your company below. For a definition of **goods subject to review/like goods**, please refer to above section on [‘the scope of this transition review’](#).

- producer of the **like goods** in the UK
- producer of the **like goods** in the UK but also an importer of **like goods** or **goods subject to review**
- other (please give details below)

If you have selected ‘other’, please describe the role of your company with regards to the **goods subject to review** or **like goods**:

N/A

A2 – Associated parties and operational links

Please give details of all associated parties involved with the company in the production and sales (export and/or domestic) of the like goods during the Period of Investigation (POI). 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](#).

Examples of activities with associated parties could include production, domestic sales, export sales, and/or further processing of the like goods. (i.e., companies owned by the same parent group).



	Company name	Company location (city, country)	Activities	Relationship (i.e., associated supplier, associated sales)
Associated party 1	[REDACTED]	[REDACTED]	PTA Producer	Supplier of raw materials

+ Add additional rows as required

A3 – Your position in respect of this transition review

Please describe whether you think the countervailing measures should be varied (including extended) or revoked and why?:

[REDACTED]

Excess Capacity and Continued Exports: India’s operational PET Capacity exceeds [REDACTED] M tonnes vs domestic demand [REDACTED] M tonnes rendering it a net exporter. Domestic operating rates average [REDACTED]. Capacity is forecast to expand [REDACTED] . to [REDACTED] M tonnes 2030. (data source Wood McKenzie).

Injury: The Company’s produces ‘like goods’ from its UK assets which total [REDACTED] PET manufacturing facilities with operational capacities [REDACTED] tonnes and [REDACTED] tonnes. Due to [REDACTED] CAPEX, operates post-2020. Employees numbers have reduced from [REDACTED] as of today and the potential for displaced employees to find alternate employment on a comparable level within the area is extremely low.

The Company operates within a highly competitive marketplace. Imports within the POI exceeded [REDACTED] kTonnes per annum (data source UK Trade Data [REDACTED]).

The company supplies its products [REDACTED]. The company’s UK market share is approximately [REDACTED] % and we take pride that every [REDACTED] out of [REDACTED] bottles on the UK shelves are made with Alpek PET

Extending ASDs will allow the domestic production in the UK to continue securing jobs and investment by competing fairly.

Section B – Production, sales and imports



Please note: if registered parties to the case provide compelling evidence that it may be appropriate to recalculate, our full questionnaires may require detailed transaction by transaction listings of all sales of the like goods during the POI. Further to this, we may also require information related to the costs to produce the like goods.

Please can you confirm whether you will be able to provide this information to the level of detail required? If you answer no, we may not include you in our sample and you may not be sent a full questionnaire.

- Yes
 No

B1 – Production

Please fill in your company’s total UK production volume and capacity for the like goods in the table below.

	Volume (KG)
Overall production of the like goods during the POI	████████████████████
Total production capacity of the like goods during the POI	████████████████████

B2 – Sales volume and value

Please provide your UK sales data for the like goods produced in the UK by your company.

	Volume (KG)	Value in GBP (£)
UK sales of the like goods produced in the UK during the POI	████████████████████	████████████████████



B3 – Imports and Sales

If your company has imported the goods subject to review from India or like goods from any other country and sold them in the UK during the POI, provide your sales data for these:

	Volume (KG)	Value in GBP (£)
Imports of the goods subject to review from India during the POI	██████████	██████████
Imports of the like goods from countries <u>other than India</u> during the POI	██████████	██████████
UK sales of the goods subject to review, imported from India during the POI	██████████	██████████
UK sales of the like goods, imported from countries other than India during the POI	██████████	██████████



Section C – Additional information

C1 – Market prices in India’s domestic & exporters market, and price comparison to the UK market

One of the factors the TRA considers in our analyses is a comparison between the UK domestic prices of the like goods, the prices of the like goods sold domestically in India, and prices of the goods subject to review (exported from India to the UK). To conduct this comparison, we need to understand Indian market prices of the like goods and the goods subject to review.

For our analyses, are you able to provide examples of the market price of the **goods subject to review exported from India to the UK**, and the **like goods produced and sold** within India – and are you able to support this information with any sources that you consider to be relevant to this investigation?

Yes, we can provide some information on market prices:

a) Domestic Prices in India: While published domestic prices in India's home market remain challenging to obtain, we understand the importance of this data for the analysis. Therefore, we actively pursued reliable sources to gain a clearer picture. Our efforts were successful, and for the period of analysis we were able to acquire published PET prices in India from [REDACTED] a well-respected market intelligence company specializing in the petrochemical sector.

b) Export Prices: We have information available on export prices of PET resin from India to global destinations. While not specific to the UK market, this data provides a valuable benchmark for understanding India's overall pricing strategy for this product, which is believed to be consistent behaviour of a tendency of subsidized prices. The source of this information is [REDACTED]

c) Domestic Prices UK: PET Resin average price delivered to the customer.

		India		UK
		a) Like goods sold domestically in India	b) Export Prices India	c) UK domestic prices of the like goods
		£/ton, Delivered	£/ton, FOB	£/ton, Delivered
Jan-Dec,	2020	[REDACTED]	[REDACTED]	[REDACTED]
Jan-Dec,	2021	[REDACTED]	[REDACTED]	[REDACTED]
Jan-Dec,	2022	[REDACTED]	[REDACTED]	[REDACTED]
Jan-Dec,	2023	[REDACTED]	[REDACTED]	[REDACTED]

Source:
a) [REDACTED]



Compared to the UK market prices of the **like goods**, can you provide any details (and where possible, any sources) that can explain any differences between UK market, and overseas export market prices? This could include, but not be limited to, product quality or production costs.

Our PET Resin produced in the UK meets the criteria for being "like" the PET resin exported from India. Both products share similar characteristics, functionality, and end uses. They utilize the same raw materials and production processes, and ultimately cater to the same customer base in the UK market.

While factors like transportation costs or minor variations in distribution channels could contribute marginally, the existence of a substantial price gap is likely attributable to unfair trade practices. No additional details were found available at this moment.

C2 – Subsidies

If you have any information about the possible existence of subsidies that are affecting the goods subject to review in India, please provide details in the box below.

It is our understanding that the subsidy programmes that were investigated originally and found to confer a benefit in the third Expiry Review Regulation that are listed below continue to apply.

The legal basis has, however, changed:

- The Advance Authorisation Scheme (AAS)
- The Duty Drawback Scheme (DDS)
- Export Promotion Capital Goods Scheme (EPCGS)
- Merchandise Export from India Scheme which has been replaced by the Remission of Duties and Taxes on Exported Products Scheme (RoDTEP)
- Gujarat Electricity Duty Exemption Scheme (GEDES)

In addition to the subsidy programmes investigated in the third Expiry Review, there are a number of new subsidy programmes that are likely to apply. These are also detailed below:

- Duty Free Import Authorisation (DFIA)
- Export Credit Agencies (ECAs)
- Interest Equalisation Scheme (IES)
- Uttar Pradesh Industrial Investment & Employment Promotion Policy 2022
- Schemes for Small and Medium Enterprises
- Recognition of Towns of Export Excellence Scheme
- Status Holder Scheme



C3 – Scope

Please review the scope of this transition review on [page 4](#). Do you consider the description of the goods subject to review to be suitable compared to those produced by the UK industry?

Yes, the description of the goods subject to review are suitable for comparison with those produced by the UK

Are there goods you feel should be included within the scope, or excluded from the current scope?

No, we don't consider exclusions should be applied to the scope of the product under review.

C4 – Other interested parties

If you believe there are other interested parties that should receive a questionnaire, please provide their organisation name and website details below. This could include other producers, importers, exporters, or any other party who may have a contribution to make to the investigation relating to PET.

Organisation name	Website
N/A	N/A



C5 – Economic Interest Test

While conducting a transition review, to make a recommendation to vary (including extending) the countervailing measure, we must conduct the Economic Interest Test (EIT). The purpose of the EIT is to determine whether the implementation of the proposed trade remedy measure is in the wider economic interest of the UK.

In order to obtain a complete picture of the UK market, could you please provide us with details of your UK suppliers (upstream companies providing inputs) and UK customers (downstream companies buying your like goods).

Find below a list of [REDACTED]:				
Company name	Company location (city, country)	Company contact information (email/telephone)	Relationship	Can we contact ? Yes/No
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	N
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	N
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	N
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	N
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	N
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	N
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	N
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	N
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	N



				N
				N
				N
				N
				N
				N
				N

C6 – Anything else

Please use the box below to provide information about anything else you consider relevant to this transition review (e.g. if relevant, compelling evidence that it may be appropriate to recalculate the countervailing amounts; comments around a particular market situation (PMS) in India):

N/A

Now you have reached the end of this questionnaire please ensure that you have prepared a **confidential and non-confidential** version and indicated the status of each within the header. The non-confidential version should redact ALL personal contact information, names, signatures, and exact sales quotes. Redacted figures should be replaced with a range where possible. Please return both versions to the TRA using the Trade Remedies Service (trade-remedies.service.gov.uk).



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If you have any questions or require further guidance, please contact the case team at the email provided.