



Registration form and Pre-sampling questionnaire

Case No.: TS0069

Transition review

Continuous filament glass fibre products originating in Egypt

Completed on behalf of (provide the name of your business or organisation):	Government of the Arab Republic of Egypt
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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: <https://www.trade-remedies.service.gov.uk/public/cases/>)

Deadline for response:	2 April 2025
Case team contact:	TS0069@traderemedies.gov.uk



Introduction

Registration of interest to the review

We invite interested parties and contributors to register their interest in this review.

An interested party is either:

1. a government of the foreign country or territory subject to the review;
2. an overseas exporter, an overseas producer or an importer of the goods subject to the review;
3. a UK producer of goods that are like the goods subject to the review; or
4. a trade or business association representing one or more of the above parties.

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

Scope of the review

Goods subject to review	<p>Continuous filament glass fibre products originating in Egypt, described as:</p> <ul style="list-style-type: none"> • chopped glass fibre strands, of a length of not more than 50mm; and • glass fibre rovings, excluding glass fibre rovings which are impregnated and coated and have a loss on ignition of more than 3% (as determined by the ISO Standard 1887.) <p>These continuous filament glass fibre products are currently classifiable within the following commodity codes (CN codes):</p> <ul style="list-style-type: none"> • 7019 11 00 00 • 7019 12 00 22 • 7019 12 00 25 • 7019 12 00 26 • 7019 12 00 39 <p>These commodity codes are only given for information.</p>
Period of investigation (POI)	01 January 2024 to 31 December 2024

For further details, please refer to the *Notice of Initiation* on the public file:

<https://www.trade-remedies.service.gov.uk/public/cases/>.



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 2 April 2025 using the Trade Remedies Service (www.trade-remedies.service.gov.uk).

The non-confidential version of your registration form and pre-sampling questionnaire may be placed on the public file: <https://www.trade-remedies.service.gov.uk/public/cases/>.

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 only used for this review (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 review or a UK producer of goods that are like the goods subject to review, we will ask you to complete a detailed questionnaire to inform this review.

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.

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



If your business is included in a 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 business may be deemed not to have cooperated in the review. 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 business than if it had cooperated.

In the event that we decide that it is appropriate to recalculate the countervailing amount within this transition review: If we decide to sample overseas exporters, and your business is not selected for this sample, you may submit a request to us to recalculate individual margins for your business. We will accept your request providing that:

- you submit the required information on time; and
- 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 review



Section A: About your business or organisation

A1. Your business' or organisation's activities

1. To determine your business' or organisation's role for the purpose of this review, please select **all** of the following options **that are applicable** to your business or organisation. Please refer to the period of investigation (POI) defined on page 2.

- [A1.1] During the POI, we produced the goods subject to review in Egypt.
Note: Please complete sections A2 and B.
- [A1.2] During the POI, we directly exported the goods subject to review from Egypt to the UK.
Note: Please complete sections A3 and B.
- [A1.3] During the POI, we indirectly exported the goods subject to review from Egypt to the UK via a third party (located either in Egypt or a third country not subject to the review).
Note: Please complete sections A3 and B.
- [A1.4] During the POI, we imported the goods subject to review originating in Egypt to the UK.
Note: Please complete sections A4 and B.
- [A1.5] During the POI, we produced goods that are like the goods subject to review in the UK.
Note: Please complete sections A5 and B.
- [A1.6] Other.
Note: Please complete section B.

2. If you selected 'Other' [A1.6], please describe the activity/activities of your business or organisation and your business' or organisation's interest in this review in the field below.

The Trade Remedies Sector of the Ministry of Investment and Foreign Trade represents the Government of Egypt as the competent authority within the territory of a Member responsible for defending Egypt's trade interests in foreign trade remedy investigations and



ensuring compliance with international trade rules under the WTO Agreement on Subsidies and Countervailing Measures (SCM Agreement).

As the official Trade Remedies Authority of Egypt, the Trade Remedies Sector coordinates with Egyptian producers and exporters, providing legal and technical support to protect Egypt's legitimate trade interests. In this transition review, the Government of Egypt is participating to:

▪ **Ensure Fair Representation of Egypt's Position:**

Clarify that no subsidy programs or financial contributions are provided by the Egyptian government to the producers and exporters of continuous filament glass fibre products.

▪ **Challenge Misattribution of Foreign Subsidies:**

Contest the incorrect attribution of financial contributions from the Government of China (GOC) to the Government of Egypt. According to established WTO jurisprudence (e.g., US – Anti-Dumping and Countervailing Duties (China)), financial contributions by a foreign sovereign state cannot legally be attributed to another sovereign nation.

▪ **Protect Egypt's Trade and Economic Interests:**

Prevent the continuation of unjustified countervailing measures that could harm Egyptian exporters and disrupt bilateral trade between Egypt and the United Kingdom.

▪ **Ensure Compliance with International Law:**

Advocate for a review process consistent with WTO rules and public international law, particularly regarding the principles of state sovereignty and non-attribution of foreign subsidies.

The Trade Remedies Sector of Egypt is fully committed to cooperating with the UK Trade Remedies Authority (TRA) by providing comprehensive information and participating in all relevant proceedings, including hearings, to ensure a transparent and fair assessment in this transition review.



A2. Production and domestic sales of the goods subject to review

Not applicable as the Government of Egypt is not a producer, exporter, or importer of the goods under review.

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

4. Please provide your business' total production volumes and production capacity for the goods subject to review during the period of investigation (POI) in the table below.

Total production volume (POI) [tonnes]	
Total production capacity (POI) [tonnes]	

If relevant, provide these figures in ranges in your non-confidential version of this form.

5. Please give details of all associated parties involved with the business in the production and sales (export and/or domestic) of the goods subject to review during the 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](#).

Company name	Company location (city, country)	Activities	Relationship

Add additional rows as required

If relevant, redact this information in your non-confidential version of this form.

6. Please provide the total of your domestic sales volumes and sales values of the goods subject to review produced by your business during the POI in the table below.

Total domestic sales volume (POI) [tonnes]	
Total domestic sales value (POI) [£]	

If relevant, provide these figures in ranges in your non-confidential version of this form.



A3. Direct and indirect exports of the goods subject to review

Not applicable as the Government of Egypt is not a producer, exporter, or importer of the goods under review.

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

Company name	Company location (city, country)	Relationship	Producer (Y/N)

Add additional rows as required

If relevant, redact this information in your non-confidential version of this form.

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

NB Exports to the UK via a third party (whether or not associated to your business), which is located in Egypt or a third country, are to be considered indirect exports.

Total direct export volume (POI) [tonnes]	
Total indirect export volume (POI) [tonnes]	
Total direct export value (POI) [£]	
Total indirect export value (POI) [£]	

If relevant, provide these figures in ranges in your non-confidential version of this form.

9. If you exported the goods subject to review to the UK via third parties, please provide details for these parties below.

Company name	Company location (city, country)	Activities	Relationship

Add additional rows as required

If relevant, redact this information in your non-confidential version of this form.



10. Please provide details of the commodity code(s) you export the goods subject to review to the UK under in the box below.



A4. UK imports of the goods subject to review

Not applicable as the Government of Egypt is not a producer, exporter, or importer of the goods under review.

11. Please provide the total of your import volumes and import values of the goods subject to review originating in Egypt to the UK during the POI in the table below.

Total import volume (POI) [tonnes]	
Total import value (POI) [£]	

If relevant, provide these figures in ranges in your non-confidential version of this form.

12. Please provide details for your suppliers of the goods subject to review originating in Egypt in the table below.

Company name	Company location (city, country)	Activities (producer, trader, etc.)	Relationship

Add additional rows as required

If relevant, redact this information in your non-confidential version of this form.

13. Please specify the purpose of the goods subject to review that you are importing from Egypt. Select **all** options that are applicable your business or organisation:

- 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)
- Other

14. If you selected 'Other', please specify the purpose of the goods subject to review that you are importing from Egypt in the field below.



15. Please describe how the goods subject to review compare to UK produced goods that are like the goods subject to review in the field below.



A5. Production and sales of goods produced in the UK that are like the goods subject to review

Not applicable as the Government of Egypt is not a producer, exporter, or importer of the goods under review.

16. Please describe the goods that you produce in the UK and that you consider to be like the goods subject to review.

17. Please provide your business' total production volumes and production capacity for UK production of goods that are like the goods subject to review during the POI in the table below.

Total production volume (POI) [tonnes]	
Total production capacity (POI) [tonnes]	

If relevant, provide these figures in ranges in your non-confidential version of this form.

18. Please provide the total of your domestic and export sales volumes and sales values of the goods that are like the goods subject to review produced by your business in the UK during the POI in the table below.

Total domestic sales volume (POI) [tonnes]	
Total domestic sales value (POI) [£]	
Total export sales volume (POI) [tonnes]	
Total export sales value (POI) [£]	

If relevant, provide these figures in ranges in your non-confidential version of this form.



Section B: Additional information

B1. Other interested parties

19. If you believe there are other interested parties that should register an interest in this case, please provide their business' or organisation's name and website details below.

Name	Website
Jushi Egypt for Fiberglass Industry S.A.E.	

Add additional rows as required

B2. Scope

20. If you consider that the goods description to which the measure subject to review applies should be different, please provide your reasons in the field below.



B3. Product control numbers

The TRA uses product control numbers (PCNs) to define and distinguish the different types and subcategories of goods that fall under the goods description of the goods subject to review. 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 country/ies subject to an investigation or review.

We have created the following draft PCN table:

Field Description	Field format	Explanation and values to be used	Value to be used
Product form	LLLL	Assembled rovings (or Multi-End rovings)	ROAS
		Direct rovings	RODI
		Volumenised direct rovings or Texturised rovings	ROVD
		Dry-use chopped strands	CSDU
		Wet-use chopped strands	CSWU
Rovings: linear density (in tex (g/km))	NN	Only for Rovings:	
		100 to 300 tex	03
		301 to 600 tex	06
		601 to 900 tex	09
		901 to 1200 tex	12
		1201 to 2400 tex	24
		2401 to 4800 tex	48
Chopped Strands: Fibre Diameter (in micrometres (µm))	NN	Only for Chopped Strands:	
		6 µm to 10,5 µm (rounded down)	10
		10,6 µm to 12,5 µm	11
		above 12,5 µm	13

Example 1: 1200 tex assembled / multi-end rovings would be ROAS12.

Example 2: Wet-use chopped strands with fibre diameters of 10µm would be CSWU10.

21. Please review the above draft PCN structure for this review and provide any comments in the field below.

No additional comments on the proposed PCN structure at this stage.



B4. Economic Interest Test

22. If, following the transition review, we conclude that the measure should be varied (including by extending its application to the goods subject to review), we conduct an Economic Interest Test (EIT) to determine whether the proposed measure is in the wider economic interest of the UK. In order to obtain a complete picture of the UK market, could you please help by providing us with details of UK upstream companies (providing inputs for the manufacture of the goods that are like the goods subject to review) and UK customers (downstream companies buying the goods). Please confirm in the final column if we are able to contact these companies.

Company name	Company location (city, country)	Contact details (email/tel.)	Relationship	Contact permission (Y/N)

Add additional rows as required

If relevant, redact this information in your non-confidential version of this form.

B5. Other comments

23. Please use the box below to provide additional information that you consider relevant to this transition review (e.g. compelling evidence why you believe it may be appropriate to recalculate the countervailing amount, or any information about subsidies in Egypt that are affecting the production or sales of goods subject to review):

The Government of Egypt represented by the Trade Remedies Sector, as an interested party in this transition review, formally requests holding a hearing or participating in any hearing that the TRA may suggest itself. This will allow us to present legal and factual arguments regarding the potential impact of the countervailing measures on Egyptian exports and to ensure that our views are fully considered by the TRA.

The Government of Egypt firmly asserts that no subsidy programs are provided by the Egyptian authorities to producers or exporters of continuous filament glass fibre products.

As outlined in previous submissions, including the response to the European Commission’s anti-subsidy proceeding (AS657), the following key points demonstrate the absence of any actionable subsidies:



▪ **No Financial Contributions by the Government of Egypt:**

There is no evidence that the Government of Egypt provides direct or indirect financial contributions to producers or exporters of continuous filament glass fibre products. The alleged financial contributions by foreign entities, particularly those linked to the Government of China (GOC), cannot legally or factually be attributed to the Government of Egypt under WTO law or the Basic AS Regulation.

▪ **Land Provisions at Market Value:**

Land transactions involving Jushi Egypt were conducted at fair market value through commercial arrangements without government intervention. The land was neither provided by a public body nor by a private entity acting under governmental direction. Therefore, these provisions cannot constitute a countervailable subsidy.

▪ **No Preferential Lending or Capital Support:**

Loans granted to Jushi Egypt were obtained from independent financial institutions and cannot be characterized as governmental financial contributions. Furthermore, there is no evidence that the Egyptian government has entrusted or directed any private entity to provide preferential financing.

▪ **No Benefit from Customs Duty Exemptions:**

Any customs duty exemptions on raw materials available to Jushi Egypt align with standard practices applicable to all businesses operating within designated economic zones. Such exemptions are non-specific and apply uniformly across all industries without providing a selective advantage.

▪ **Tax Treatment of Foreign Exchange Losses:**

The 2016 special tax rule concerning foreign exchange losses is a broad-based measure available to all entities affected by currency devaluation. It is a general tax measure and does not provide a specific or exclusive benefit to producers of the goods under review.

▪ **Violation of Legal and Procedural Standards:**

Any attempt to attribute actions of a foreign sovereign (e.g., the Government of China) to the Government of Egypt violates international law principles of state sovereignty and non-attribution, as upheld by WTO jurisprudence, including US – Anti-Dumping and Countervailing Duties (China) and China – GOES.

The Government of Egypt urges the TRA to recognize the absence of countervailable subsidies and to ensure a fair and objective assessment in line with WTO rules and international legal principles and to terminate any countervailing duties imposed on the subject product originating from Egypt.

We also affirm our full commitment to cooperating with the TRA throughout the review process, including providing additional information as required.

If relevant, redact this information in your non-confidential version of this form.