



# Registration form for interested parties and contributors

Case No.: AD0087

Anti-dumping investigation

Glass Containers originating in the People's Republic of China (PRC)

Completed on behalf of (provide the name of your company):	Continental Bottle Co. Limited
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*(to note, we use the term "company" to include all forms of business organisation including partnerships and sole traders)*

**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](http://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:	<b>20 March 2026</b>
Case team contact:	<a href="mailto:AD0087@traderemedies.gov.uk">AD0087@traderemedies.gov.uk</a>



## 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](http://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 an 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	<p>Glass containers originating in the People's Republic of China (PRC), described as:</p> <p>Carboys, bottles, flasks, jars, pots, phials, preserving jars, and other containers, of glass, of a kind used for the conveyance or packing of goods; whether or not including a closure. Not including ampoules; containers made of tubular glass; glass containers with a nominal capacity of 2.5 litres or more; or standalone stoppers, lids, or other closures of glass.</p> <p>These glass containers are currently classifiable within the following commodity codes:</p>		
	70 10 90 10 00	70 10 90 51 00	70 10 90 67 00
	70 10 90 41 00	70 10 90 53 00	70 10 90 71 00
	70 10 90 43 00	70 10 90 55 00	70 10 90 79 00
	70 10 90 45 00	70 10 90 57 00	70 10 90 91 00
	70 10 90 47 00	70 10 90 61 00	70 10 90 99 00



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Period of investigation (POI)	1 January 2025 to 31 December 2025
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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 **20 March 2026** using the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://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](#)<sup>1</sup> 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 a contributor, we will ask you to complete a detailed questionnaire to inform this investigation.

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



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
- 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.



## 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 PRC to the UK.

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

- [A1.2] During the POI, we produced the goods concerned in the PRC, 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 PRC 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 in the PRC 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 or like goods.

**Note: Please complete sections A4 and B.**

- [A1.6] During the POI, we imported the goods concerned originating in the PRC 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.



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.

## 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 PRC**.

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.

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

Total production volume (POI) in tonnes (1,000kg)	
Total production capacity (POI) in tonnes	

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

6. 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

Add additional rows as required

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



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7. 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).

8. 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) in tonnes	
Total domestic sales value (POI) (£)	

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

9. 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.

10. 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)?

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



### 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 PRC**.

12. 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.

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

Add additional rows as required

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

13. 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 PRC or a third country, are to be considered indirect exports.

Total direct export volume (POI) in tonnes	
Total indirect export volume (POI) in tonnes	
Total direct export value (POI) (£)	
Total indirect export value (POI) (£)	

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

14. 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

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 details of the commodity code(s) you export the goods concerned to the UK under in the box below.

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

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).

16. 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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17. 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.

Total production volume (POI) in tonnes	
Total production capacity (POI) in tonnes	

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

18. 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.

Total domestic sales volume (POI) in tonnes	
Total domestic sales value (POI) (£)	
Total export sales volume (POI) in tonnes	
Total export sales value (POI) (£)	

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



19. 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.

20. 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)?

## 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 PRC**.

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

Total import volume (POI) in tonnes	1,600 to 2,000
Total import value (POI) (£)	£2.4M to £2.8M

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

22. Please provide details for your suppliers of the goods concerned originating in the PRC in the table below.

Company name	Company location (city, country)	Activities (producer, trader, etc.)	Relationship
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Supplier
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Supplier
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Supplier



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sensitive information]			
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Supplier

Add additional rows as required

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



23. Please specify your purpose in importing the goods concerned from the PRC. 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 reexport the good to third countries, namely\_\_\_\_\_
- Other.

24. "If you selected "other", please specify your purpose for importing the goods concerned from the PRC in the field below.

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

The goods we import are only comparable to UK-produced goods at a very high level, primarily by virtue of commodity code classification. In practice, there are **no directly comparable "like goods" manufactured in the UK** that meet the same specifications, commercial requirements, or supply conditions. Specifically, **[the exact split of the allocation has been deleted for reasons of commercial sensitivity]**. The majority of these imports [the exact volume has been deleted for reasons of commercial sensitivity] consist of **perfume and fragrance bottles**, which are highly specialised products. These bottles are typically **bespoke in design**, often requiring specific shapes, specific aesthetic qualities, and customised decoration techniques also not available in the UK.

UK manufacturers do not generally produce these goods for several structural reasons:

- **Production constraints and commercial focus:** UK glass producers are primarily configured for large-scale, standardised production runs (e.g. food and beverage containers). In contrast, the fragrance bottles we supply require **small minimum order quantities (MoQs)**, high levels of customisation, and complex moulding and finishing processes, which are not aligned with the operational or economic models of UK furnaces.



- **Lack of technical and design capability alignment:** Many of the imported bottles involve **specialised design features and decoration** (e.g. embossing, coatings, intricate geometries) that are not widely offered by UK suppliers at commercial scale.
- **Lead times and responsiveness:** Even where UK producers may theoretically have some capability, **lead times are longer**, flexibility is limited and minimum order quantities are prohibitive. This is incompatible with the needs of our customers, particularly in the fragrance and cosmetics sectors, where **speed to market and design differentiation are critical**.

As a result, these imported goods do not compete with UK production in any meaningful sense. Rather than displacing UK manufacturing, they **fill a structural supply gap**.

From an **Economic Interest Test** perspective:

- **No injury to UK industry:** Since UK producers do not manufacture these specific products, there is **no direct competition and therefore no injury or threat of injury** arising from imports.
- **Supporting downstream UK industries:** Our imports are essential inputs for a wide range of UK-based businesses, particularly **SMEs in the fragrance, cosmetics, and personal care sectors**. These companies rely on access to **high-quality, differentiated packaging** to compete effectively in both domestic and export markets.
- **Impact on competition and consumer choice:** Restricting access to these imports would reduce product variety, limit innovation, and **increase costs across the value chain**, ultimately impacting UK consumers and brand competitiveness.
- **Supply chain resilience and concentration risk:** Given the absence of a viable UK supply base for these products, restricting imports would lead to **increased supply concentration risk**, reduced resilience, and potential disruption to UK manufacturing customers.
- **No realistic substitution:** There are **no viable UK alternatives** that could replace these imports within reasonable timeframes, cost structures, or technical specifications.

In summary, the goods we import are **not “like goods” to those produced in the UK in any commercially meaningful sense**. They serve a distinct market segment that is currently **unmet by UK manufacturers**. Consequently, imports do not cause injury to UK industry; instead, they **enable the competitiveness and growth of downstream UK sectors**, which is strongly aligned with the UK’s broader economic interest.



## 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

26. 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)	Company name	Company website	Company email
[redacted – commercially]	[redacted – commercially sensitive]	[redacted – commercially sensitive information]	

Add additional rows as required

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

#### B1.2 Upstream and downstream companies

27. 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.

Company name	Company location (city, country)	Contact details (email/tel.)	Relationship
[redacted – commercially sensitive]	[redacted – commercially sensitive]	[redacted – commercially sensitive information]	[redacted – commercially sensitive]
[redacted – commercially sensitive]	[redacted – commercially sensitive]	[redacted – commercially sensitive information]	[redacted – commercially sensitive]
[redacted – commercially sensitive]	[redacted – commercially sensitive]	[redacted – commercially sensitive information]	[redacted – commercially sensitive]

Add additional rows as required

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



### B1.3 Any other companies

28. 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.

## B2. Scope

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

We consider that the current goods description for this investigation is overly broad and captures products that are **not produced by UK manufacturers and do not compete with UK production**. We therefore submit that the scope of the investigation should be **varied to exclude glass containers classified under commodity codes 7010909100 and 7010909900**.

UK glass container manufacturing is primarily focused on **standardised containers for the food and beverage industries**, together with a **range of pharmaceutical containers**. These products are produced in large volumes, to standard specifications, and are clearly identifiable within the existing commodity code structure.

This structure already distinguishes mainstream food, beverage, and pharmaceutical containers from other glass products. By contrast, **codes 7010909100 and 7010909900 are commonly used for glass containers intended for other applications**, including cosmetics, fragrance, and specialist consumer goods. These products fall outside the core profile of UK production and should not be treated as “like goods” to UK-manufactured containers.

A significant proportion of imports under these two commodity codes consist of **bespoke fragrance and cosmetic glass**, including complex or non-standard designs, and short production runs. These products are supplied in **small minimum order quantities** and often require bespoke tooling and frequent design changes.

UK manufacturers **do not, in practice, produce these goods**. In particular, they generally do not offer:

- commercially viable low or medium minimum order quantities suitable for SMEs;
- affordable tooling and setup costs for bespoke designs;
- the capability or commercial appetite to produce niche or complex fragrance bottles; or



- lead times that meet the needs of smaller, fast-moving brands.

As a result, these imported products **do not compete with UK production**. Including them within the scope risks capturing goods for which **no UK “like goods” exist**.

Because UK manufacturers do not produce these types of containers, applying anti-dumping measures to them would **not protect any domestic producer**. Measures would not redirect demand to UK manufacturing, as UK producers do not have the capacity, capability, or commercial model to replace these imports.

Instead, measures would simply **restrict supply**, without addressing injury to domestic industry, because **no such industry exists for these products thus no injury can occur**.

Excluding these codes from scope is also necessary to ensure that the **Economic Interest Test is met**:

- **Supply availability:** UK manufacturers cannot supply these bespoke products at the required specifications, volumes, or lead times. Restricting imports would create supply gaps.
- **Impact on SMEs:** SMEs in the cosmetics, fragrance, and craft sectors rely on imported glass for flexibility, manageable order sizes, and cost-effective production. Restrictions would disproportionately harm smaller businesses.
- **Competition and consumer choice:** Imports support competition, innovation, and product variety. Restricting access would narrow choice and concentrate supply in a small domestic base that does not meet market needs.
- **Pricing and supply risk:** Higher packaging costs would increase prices for downstream businesses and consumers, while increasing reliance on a limited domestic supply base.

### Conclusion

For these reasons, we submit that **commodity codes 7010909100 and 7010909900 should be excluded from the scope of the investigation**. These codes cover products that are **not comparable to UK-produced glass containers**, do not compete with UK manufacturing, and are essential to downstream UK businesses. Varying the goods description in this way would ensure the investigation remains focused on genuinely comparable products and avoids unintended harm to UK SMEs and consumers.

30. 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 glass containers.

Our business supplies *bespoke, design-led perfume and fragrance bottles* that are developed specifically for small and medium-sized UK brands. These products are **not interchangeable** with the glass containers manufactured in the UK today.

### 1. No UK production of like goods



UK glass manufacturers primarily produce **standardised, high-volume bottles and jars** for food, beverage, and household products. In contrast, the perfume and fragrance bottles we supply have the following characteristics:

- **Bespoke shapes and complex designs**, often developed jointly with brand owners to reflect brand identity.
- **Low minimum order quantities**, which are essential for SMEs launching new products or operating at small scale.
- **Specialised tooling, decoration, and finishing techniques**, used to achieve premium aesthetics typical in the fragrance sector.

UK manufacturers generally **do not offer** these capabilities. Their minimum order quantities (upwards of 50k and often more than 150k units) and tooling costs (£35k) are substantially higher than those of international suppliers, making bespoke development **commercially inaccessible** for most SMEs. Lead times from UK factories are also significantly longer, limiting flexibility for businesses that need to respond quickly to market changes. As a result, UK manufacturers do not make “like goods” in the sense required for anti-dumping analysis.

## 2. No injury to UK industry

Because UK producers do not supply goods comparable to bespoke fragrance bottles, **imports do not displace UK production**. The domestic industry’s output is focused on standard containers used in food and beverage markets. These are structurally different products, serving different customers and production systems.

The goods under investigation—bespoke, design-specific fragrance bottles with small MOQs—fill a market segment that UK producers do not participate in. Anti-dumping duties would therefore **not protect UK manufacturers**, because there is **no domestic supplier** making these goods.

## 3. Economic Interest Test considerations

The Economic Interest Test strongly supports continued access to imported bespoke glass packaging:

### a. Supply availability

Applying duties would restrict access to the only viable supply route for bespoke perfume bottles. SMEs and niche brands—which depend on short runs, rapid development cycles, and accessible tooling—would face material disruption. UK manufacturers cannot fill this gap because they do not offer comparable bespoke production or MOQs.

### b. Impact on SMEs and innovation

SMEs make up a significant share of the UK fragrance, beauty, and craft sectors. Their competitiveness relies on the ability to create distinctive packaging without committing to large-scale production or high upfront costs. Duties would raise barriers to entry, reduce the ability of small businesses to innovate, and potentially prevent new UK brands from launching.

### c. Competition and consumer choice

Limiting access to imported bespoke glass would:

- Reduce the range of packaging available to UK brand owners



- Decrease competition among suppliers
- Concentrate supply onto a small number of domestic manufacturers who do not currently meet this market's requirements

This would narrow product variety and could diminish the competitiveness of UK-based fragrance and home-care brands, many of whom export.

#### **d. Pricing and consumer impact**

Imported bespoke glass allows SMEs to produce at viable cost levels. Duties would increase input costs, which SMEs cannot easily absorb. These costs would ultimately be passed on through higher consumer prices or reduced product offerings.

#### **4. Conclusion**

The bespoke perfume and fragrance bottles our business supplies are **not produced by UK manufacturers**, are **not interchangeable** with their products, and therefore **cause no injury or threat** to the domestic industry. Applying anti-dumping measures would not protect any UK producer but would instead:

- Restrict essential supply for UK SMEs
- Reduce competition and consumer choice
- Increase costs throughout the value chain
- Concentrate supply in a way that does not meet current market needs

For these reasons, the goods concerned should not be considered "like goods" to UK production, and the Economic Interest Test is **not met**.

### **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 PRC.



We have created the following draft PCN table:

Category	Code	Description
Glass colour	P	Colourless (premium / extra white flint)
	S	Colourless (standard flint)
	C	Coloured glass
Nominal capacity	A	0-24 ml
	B	25-49 ml
	C	50-74ml
	D	75-99 ml
	E	100-199ml
Weight	A	0-24 g
	B	25-49 g
	C	50-74 g
	D	75-99 g
	E	100-149 g
Includes external (post-consumer) cullet	A	Yes, up to 24%
	B	Yes, 25-49%
Food assured	F	Yes (assured safe for use in food products)
	N	No (not food assured)
Pharmaceutical assured	P	Yes (assured for use as a pharmaceutical container)
	N	No (not assured as a pharmaceutical container)
Pressure assured	P	Yes (assured safe for pressurised goods (e.g. carbonated beverages))
	N	No (not assured safe for pressurised goods)
Volumetric assured	V	Yes (assured for use as a volumetric container)
	N	No (not assured as a volumetric container)
Container type	B	Bottle (narrower neck than body)
	J	Jar / ramekin (wide neck)
	O	Other
Container design	S	Standard / generic / non-branded
	N	Non-standard / bespoke / complex (e.g. shaped / embossed)
Post furnace decoration	A	Painted / sprayed / printed
	B	Labelled, sleeved
	C	Other / multiple
	N	Not decorated
Supplied with lid / closure	Y	Yes
	N	No



Some examples of products and their corresponding PCNs are below:

- An amber pharmaceutical bottle with a nominal capacity of 50ml, weighing 40g, with a standard design and not provided with decoration. This good would be food assured but not volumetrically assured, and not suitable for use with pressurised products. This good was manufactured using 20% external cullet and is supplied with a lid  
= **CCBA FNNV BSNY**
- A standard flint (clear) food jar with a nominal capacity of 250ml, weighing 202g with a standard generic design and provided with an adhesive label at the factory. This good is not assured for use with foods, pharmaceuticals or pressurised goods. It is not volumetric, was not manufactured using external cullet, and is not supplied with a lid  
= **SFGN NNNN BSNN**
- An amber beer bottle with a nominal capacity of 500ml, weighing 290g, with a bespoke moulded design, volumetric assurance, usable for pressurised food but not pharmaceuticals, with a direct printed label and a single colour spray coating. This good was produced using 15% external cullet and is supplied with a lid  
= **CIHA FNPV BNCY**

31. 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 draft PCN structure is generally appropriate for categorising the goods imported by our company and provides a reasonable framework for comparison. However, we consider that it would benefit from limited refinement to ensure that it captures all relevant technical characteristics and reflects differences in end use.

In particular, we suggest the addition of a **separate category for bottle neck finish**. Neck finish is an important technical and commercial characteristic, as it determines the type of closure that can be used and the intended application of the container. A number of neck finishes commonly used in the fragrance and cosmetics sector — including **FEA15, CNI15 and SNI15** — are not produced by UK manufacturers in practice and are not clearly distinguished within the current PCN structure.

These specialist fragrance neck finishes serve different markets from containers produced with more standard neck finishes, such as **ROPP, cork and stopper finishes**, which are typically associated with food and beverage applications. Including neck finish as a PCN category would allow these differences to be more clearly identified and would improve the accuracy and usefulness of the PCN structure for categorising imported goods and assessing comparability with UK production.



32. 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).

The draft PCN framework is a useful starting point, but it omits several **technical and commercial characteristics** that materially affect price and comparability. As the TRA notes, PCNs are intended to capture physical and commercial differences that drive pricing; to achieve that goal for our product range, further granularity is required

**End-use segment (market served).** We recommend adding an attribute for **industry/segment** (e.g., fragrance/perfumery, cosmetics, pharmaceutical, food & beverage). Fragrance/perfumery glass is typically specified to **higher visual and dimensional standards** than food jars or distillery bottles and often involves bespoke shapes and premium aesthetics. These segment differences influence quality assurance, rejection thresholds, and decoration requirements, and therefore **price levels**, yet they are not captured by the current PCN categories.

**Neck finish and pump/closure compatibility.** We reiterate the need for a **neck-finish** attribute. Specialist fragrance finishes such as **FEA15, SNI15, and CNI15** are engineered for atomiser pumps and have different tolerances (e.g., thread profile, ovality, concentricity) from beverage finishes like **ROPP, cork, and stopper**. These features drive tooling complexity, dimensional control, and unit cost and should be distinguished for accurate PCN mapping and price comparison.

**Dimensional and cosmetic tolerances.** Beyond nominal capacity and weight, fragrance glass often carries tighter tolerances for **wall thickness, weight variance, base/neck concentricity, and flatness** (to ensure pump fit and leak performance). Capturing a **tolerance class** would help avoid comparing higher-precision perfume bottles to standard-tolerance food/beverage containers.

**Batch size/MOQ and tooling.** Small-to-medium **minimum order quantities**, frequent design changes, and **bespoke mould/tooling** amortisation are typical in perfumery. These drive higher per-unit costs than standard, long-run beverage production. A PCN field indicating **production run type** (bespoke/short-run vs standard/long-run) would improve comparability.

**Implication for “like goods”.** Because UK manufacturers are primarily configured for standardised food and beverage containers, they do **not generally produce** the combination of **specialist neck finishes, higher quality grades (e.g., T2), tight tolerances, premium flint, and small-run bespoke designs** required in perfumery. Consequently, the imported perfume bottles we supply are **not like goods** to UK production in any commercially meaningful sense. Adding the attributes above would make this distinction transparent and avoid price comparisons that **do not reflect product reality**; importantly, it shows that anti-dumping measures on these products would **not protect any domestic producer**, but would instead constrain supply to UK downstream users.



33. 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?

We consider that the current “**container type**” category within the PCN structure is **too high-level to capture important technical and commercial differences**, particularly within the broad category of “bottles”. While the distinction between bottles, jars and other containers is helpful, it does not adequately reflect the diversity of bottle types supplied to different end markets.

In practice, bottles used for **different market segments**—such as fragrance, cosmetics, pharmaceuticals, food and beverages—are **not interchangeable**, even where they share a general bottle form. A key differentiating factor is the **neck finish**, which determines the type of closure or dispensing system that can be used and is closely linked to the intended application of the container.

For example, **fragrance and cosmetic bottles** commonly use specialist neck finishes such as **FEA15, SNI15 and CNI15**, which are designed to work with atomiser pumps and require tight dimensional tolerances. These bottles are typically supplied in smaller volumes, are often bespoke in design, and are produced to higher visual and technical standards. By contrast, bottles produced for **food and beverage markets** generally use standardised neck finishes such as **ROPP, cork or stopper finishes**, which are compatible with high-volume filling lines and standard closures.

Treating all bottles as a single container type therefore **groups together products that serve different markets, have different technical specifications, and are priced differently**. This limits the ability of the PCN structure to support accurate price comparison or to assess whether imported goods are genuinely comparable to UK-produced containers.

We therefore consider that a **wider distinction within the “bottle” category is required**, either through the inclusion of a specific **neck-finish characteristic** or through further sub-categorisation linked to market segment or functional use. This would improve the accuracy of the PCN structure and better reflect commercial reality, particularly given



that UK manufacturers do not generally produce bottles with specialist fragrance neck finishes. As a result, without further differentiation, the current container-type category risks overstating comparability between imported goods and UK production.

34. 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).

## B4. Particular market situation and representative third country

The applicant has alleged that there is a Particular Market Situation (PMS) in the market for the goods concerned in the PRC. The TRA will therefore assess whether such a PMS exists as part of its investigation.

35. If you consider that there is a PMS in the PRC, please provide reasons and relevant information. This can include examples such as:

- Prices are artificially low;
- There is significant barter trade (e.g. goods exchanged for other goods);
- Prices reflect non-commercial factors; or
- Anything else.

We do not believe there is a PMS in the market for the goods concerned.

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If the TRA determines that a PMS exists and the effect of the PMS on the domestic sales price is that it is not possible to make a proper comparison between that domestic sales price and the export price, it may not use the domestic sales price for the purpose of determining normal value.

In such circumstances, the TRA may determine normal value using the costs of production plus a reasonable amount for administrative, selling, and general costs and for profits. The TRA may also make adjustments to those costs and profits using data from an appropriate, representative third country if it determines that any relevant costs or profits are unrepresentative because they do not reasonably reflect the overseas exporter's costs or profits in a market that is substantially determined by market forces.



36. In the event that the TRA needs to make such adjustments, the applicant has proposed Brazil as an appropriate representative country. Please provide any comments on the applicant's suggested representative country.

No foreseen issues with the suggestion.

37. In the event that you do not agree with the appropriate representative country proposed by the applicant and the TRA needs to make such adjustments, please suggest an alternative third country from which suitable cost and profit data can be obtained. Please explain your reasons for suggesting this country.

38. If you have suggested an appropriate representative third country, please provide contact details of a producer in that country who may be willing to participate in the investigation (if you have them).

## B5. Other comments

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

Based on our experience as a UK importer of glass containers and the evidence we have already provided in this form, we consider that the relevant UK-made products are not like goods for a material part of the range we import. In particular, UK manufacturers do not supply **fragrance bottles**, which represent the majority of our imports by value and volume. These products are highly specialised, frequently bespoke in design, and typically require small minimum order quantities, complex moulding, and decorative processes that are not offered by UK glass producers on a commercial basis. As a result, imposing anti-dumping measures on imports of these fragrance bottles from the PRC would not protect a domestic producer of those goods, as no such production exists in the UK. Instead, such measures would reduce supply, limit choice, and increase costs for downstream UK businesses—particularly SMEs in the fragrance and cosmetics sectors—without delivering any corresponding benefit to UK glass manufacturing.



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We would welcome the opportunity to have a meeting with the case team to expand on the points made in the registration form.

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