



Anti-Dumping/Countervailing Duties Questionnaire for interested parties/contributors Cases TD0008 and TS0009: Continuous filament glass fibre products originating in the People's Republic of China

Period of Investigation (POI):	1 January 2020 – 31 December 2020
Injury period:	1 January 2017 – 31 December 2020
Deadline for response:	10 th May 2021 (<i>extended to 28th May 2021</i>)
Contact details:	Anti-dumping: TD0008@traderemedies.gov.uk Countervailing duties: TS0009@traderemedies.gov.uk
Completed on behalf of:	<i>British Glass Manufacturers Confederation</i>

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

Confidential

X Non-confidential – will be made publicly available

Your completed response must comprise this questionnaire and the corresponding annex. Please note that you will have to provide a **Confidential** and a **Non-Confidential** version of both the questionnaire and annex, as well as any additional documents you append. All documents should be uploaded to the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **10th May 2021**.

Please remember to upload this dumping and countervailing duties questionnaire to **both cases** on the Trade Remedies Service (www.trade-remedies.service.gov.uk). The Trade Remedies Investigation Directorate is investigating each case separately and you will not be able to participate in both if only one is uploaded.



Table of Contents

Introduction	3
Preparing confidential and non-confidential copies.....	5
What happens next.....	6
The scope of this review.....	6
Goods subject to review	6
Like goods	7
SECTION A: About these cases	8
A1 General information	8
A2 Impact of measures	9
SECTION B: Next steps and declaration	11
Next steps	11
Declaration.....	11



Introduction

About us, this case and this questionnaire

The Trade Remedies Investigations Directorate (TRID) of the UK's Department for International Trade investigates whether trade remedies are needed to prevent injury to UK industry.

TRID was established within the Department for International Trade in March 2019 to give the UK its own independent trade remedies system. Once the Trade Bill has passed through Parliament and received Royal Assent, the Trade Remedies Authority (TRA) will be established as an independent Arm's Length Body, taking over the functions exercised by TRID.

As part of our work, we are carrying out a transition review of each trade remedy measure active under the EU system that the United Kingdom (UK) has decided to maintain after EU exit.

TRID will be carrying out a transition review of each trade remedy measure active under the EU system that the UK has decided to maintain after EU exit. This transition review will consider whether the measure is necessary or sufficient to offset the dumping/subsidy amount and whether there would be injury to the UK industry if that amount was revoked.

Why should I take part?

You have received this questionnaire because your organisation has been identified as being involved with the industry for continuous filament glass fibre products. We are asking you to complete it to help us understand the economic impact of maintaining or revoking measures.

How do I respond?

Detailed guidance on how to complete the questionnaire is provided in the [instructions](#) section below.

Please complete as much of this questionnaire as you can by **10th May 2021**. We may contact you again to ask for clarification or supplementary information if necessary. Please provide the source for all information or data you don't own and clearly state any restrictions on sharing it.

Where can I find more information?



Our [trade remedies guidance](#) provides general information about our investigations and processes we follow.

If you have any specific questions relating to the case, now or while you're completing the questionnaire, please contact the Case Team at TD0008@traderemedies.gov.uk (Anti-dumping) or TS0009@traderemedies.gov.uk (Countervailing duties).

Instructions on completing this questionnaire

Preparing your response

This section sets out guidance on how to complete this questionnaire.

If you think you won't be able to complete the questionnaire within the required time, please contact the Case Team ahead of the deadline using the contact details on the cover of this questionnaire. You should outline the length of extension you need and the reasons why. We will notify you of our decision.

If we can accommodate an extension, we will publish a note on our [public file](#) to record both the request and the extension granted.

How to answer the questions

Please read and follow all the instructions carefully. Your company will need to substantiate all claims with relevant data and information. You may be asked to attach supporting documents in appendices to supplement your responses.

Please also note the following points:

- Do not leave any questions blank. If the question is not relevant to your organisation, please explain why.
- If the answer to a question is "zero", "no" or "none", please write this rather than leaving the answer blank.
- Please complete the spreadsheet annexes as requested. Annexes are named to correspond to the relevant sections of this questionnaire and must be completed with reference to the instructions provided. If you feel you cannot present the information as requested, please contact your Case Team as soon as possible.
- Please provide all formulas and calculations used within your questionnaire response.
- If there is insufficient space in any part of the questionnaire to provide the details requested, or we ask for copies of additional information, please submit this information as appendices. Please ensure that any attachments are given a corresponding appendix reference in the title of the document and that these are referenced in the boxes provided.
- Any documents not in English should be accompanied by an English translation.



- Please provide all dates in the format DD/MM/YYYY (e.g. 23/05/2019).
- Unless otherwise stated, 'year' or 'calendar year' refers to the period 1 January – 31 December and 'quarter' refers to the associated three-month periods e.g. 1 January – 31 March, 1 April – 30 June, etc.
- Identify all units of measurement and currencies used in tables, calculations and lists, if not provided by the corresponding instructions, and use units of measurement consistently (e.g. do not use kg and metric tonnes interchangeably).
- For all numerical figures, where appropriate please express every third number with a comma (e.g. '1,300' for one-thousand three hundred, '1,300,000' for one million and three-hundred thousand).
- Please limit all sales/currency/income figures to two decimal places, apply a full point as a decimal separator and use the appropriate currency symbol or abbreviation (e.g. £1,300.00).
- Provide all costing figures as actual amounts. Where actual amounts cannot be provided and you have reported standard costing instead, please indicate this in the relevant answer, and explain the variance from actual costs, if any.
- All figures should be reported net of tax unless otherwise stated.
- Please refer to the case number, TD0008 (Anti-dumping) or TS0009 (Countervailing duties) in any correspondence with TRID.

Preparing confidential and non-confidential copies

You will need to submit one confidential version and one non-confidential version of your questionnaire and the corresponding spreadsheet annexes by the due date. We will publish the non-confidential version of your information on our public file. **Please ensure that each page of information you provide is clearly marked either "Confidential" or "Non-Confidential" in the header.**

Please see our guidance on [how to submit information](#) for further details on what can be considered confidential and how to prepare a non-confidential version of this questionnaire.

In preparing your response, please note the following:

- It is your responsibility to ensure that the non-confidential version does not contain any confidential information.
- Remember to include a statement explaining why information obtained in your response should be treated as confidential e.g. the data is commercially sensitive.
- Provide the source for all information or data you don't own and clearly state any restrictions on sharing it.
- If you do *not* provide a non-confidential summary (or a statement of reasons why you cannot provide this) each time you provide confidential information, TRID may disregard the information you give us.



All information provided to TRID 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*) and will be stored in protected systems. The non-confidential version of your submission will be placed on the public file, which is available on www.trade-remedies.service.gov.uk/public/cases.

What happens next

Once you have completed your questionnaire responses including the corresponding annex(es) and any additional documents requested, you must upload confidential and non-confidential versions through our [Trade Remedies Service](#). Following this:

- you will receive an email confirming the documents have been uploaded successfully;
- the Case Team will contact you if further information is required;
- the non-confidential responses will be placed on the public file; and
- the Case Team may contact you to arrange a visit to verify the information contained in your responses.

The scope of this review

Goods subject to review

Trade remedies are measures designed to address unfair trading practices which mean imports from overseas cause injury to UK industry. Measures generally take the form of a tariff payable on imports.

This review covers products described as:

- chopped glass fibre strands, of a length not more than 50 mm;
- 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); or,
- mats made of glass fibre filaments excluding mats of glass wool

originating in The People's Republic of China, destined for consumption in the UK. These continuous filament glass fibre products are currently classifiable within the following commodity codes (CN codes):

- 7019 11 00



- ex 7019 12 00 (TARIC codes 7019 12 00 22, 7019 12 00 25, 7019 12 00 26, 7019 12 00 39)
- 7019 31 00.

In this questionnaire, these goods will be referred to as ‘**the goods subject to review**’. Any reference to ‘goods subject to review’ in this questionnaire refers to the goods description above, regardless of the commodity code under which they are exported.

Like goods

In addition to the ‘**the goods subject to review**’, we want to know about ‘**like goods**’. Any reference to ‘**like goods**’ in this questionnaire refers to goods which are like the goods subject to review in all respects, or with characteristics closely resembling them, produced by countries other than The People’s Republic of China (including the UK) and sold in the UK.

The Economic Interest Test

The aim of the Economic Interest Test is to assess if the application of a possible trade remedy measure is in the economic interest of the UK, considering effects on wider industries as well as the directly affected UK industry. When conducting the Economic Interest Test we will consider the:

- Injury caused to UK industry by the imports under review and benefits to that industry of removing the injury,
- Economic significance of affected UK industries and consumers,
- Potential effect of the trade remedy measure on industries and consumers,
- Potential effect on particular geographic areas or groups within the UK,
- Potential consequences for the competitive environment and the structure of UK markets for these goods, and
- Other factors that we consider relevant.

You can find more information about this in our [guidance on the Economic Interest Test](#).

When assessing if a measure is in the economic interest of the UK, we will consider the effect this measure is likely to have on domestic industries. We are interested in any company which:

- Is based in the UK and supplies inputs used in the production of the goods subject to review or purchases outputs.
- Is based in the UK and supplies inputs (goods, equipment or service) used in the production of UK-produced like goods.



SECTION A: About these cases

A1 General information

1. Please complete the table below. Make sure the point of contact you name has the authority to provide this information.

Name (point of contact):	REDACTED
Address:	British Glass Manufacturers Confederation 9 Churchill Way, Chapeltown, Sheffield, South Yorkshire S35 2PY
Telephone No:	REDACTED
Email:	REDACTED
Website:	www.britglass.org.uk

If you are representing a company, please also fill in the information below:

Company registration number:	00539065
Place of registration:	9 Churchill Way, Chapeltown, Sheffield, South Yorkshire S35 2PY
Legal name of organisation:	The British Glass Manufacturers Confederation
Legal structure (e.g. limited company, sole trader, partnership etc):	Limited company
Position in the organisation:	Policy Officer
Year of establishment:	1954
Other operating names:	

2. Please explain your interest in transition reviews TD0008 and TS0009.

British Glass represent 100% of the continuous glass fibre manufacturers in the UK.

British Glass is the UK body which supports glass manufacturing in the UK. We therefore have an interest in any aspect that could impact the competitiveness of our members including dumping and subsidies from overseas competitors.

British Glass believe that the UK glass industry should be able to operate on a level playing field with competitor industries in other territories.

3. If you are a trade body please list all members who may have an interest in the transition reviews, including contact name and email.



Electric Glass Fiber UK, Ltd.

NAME AND CONTACT DETAILS REDACTED

A2 Impact of measures

For each question, please give any information you feel is relevant to the reviews. If you have no information, please say so in your answer. These transition reviews will consider whether the current anti-dumping/countervailing measures are necessary or sufficient to offset dumping/subsidisation and whether there would be injury to the UK industry if the measures were removed.

1. Please provide any information about the goods subject to review that you consider relevant.

We have no further information to add on the products subject to review. We are content with the product definitions and scope in question.

2. Provide any information which you think could help us assess the likelihood of dumping occurring if the existing anti-dumping/countervailing measures for the goods subject to review no longer applied.

The measures in place for the goods subject to review are essential in maintaining a level playing field for the UK fibreglass industry.

It is important to stress that Chinese domestic prices and costs are distorted. They must not be used in the calculation of normal value of the goods in question. The European Commission, in an [extensive document](#) highlighting economic and market distortions in the PRC, make it clear that the Chinese market is distorted by the actions of the Chinese state and Chinese Communist Party.

The EU Commission document demonstrates that:

- Land is not traded according to free market principles. All land belongs to the state and there is extensive political involvement in the allocation of land. This was found to be the case for filament glass producers; see below:
 - The EU TDI investigation on certain filament glass fibre products found that: '[...], for each and every land use right purchase by the sampled exporting producers, the Commission found no evidence of an auction process that independently set the price of the land use right. The exporting producer [...] was the only bidder, [and] was awarded the land use right'.



- Energy costs and supply are not subject to market principles. There is extensive state control of energy. Many industries, particularly heavy industry (e.g. glass, steel), receive special energy prices to reduce costs.
- The allocation of capital is not subject to market principles. There is evidence of artificially low borrowing costs not reflective of the market situation.
- Provision of raw materials is not subject to free market principles. The Chinese state controls the availability, and can set the prices, of raw materials. Through a range of mechanisms, the state can control supply and access to raw materials across the economy.
- The Chinese labour market is not sufficiently free or fair as to match that of the UK. Workers do not have strong rights to strike or bargain collectively. They require permits to work in different geographic areas. These permits are, of course, state controlled.

Should measures be rescinded, Chinese imports to the UK will benefit from a substantial and material reduction in payable duty. Glass fibre products are subject to a third country duty of 7.00% under the UKGT. There is therefore scope for a significant reduction in the price of Chinese fibreglass imports to the UK.

Multiple European trade defence investigations over the last decade have found it necessary to apply measures against glass fibre imports from the PRC in respect of both subsidy and dumping. It is clear that the PRC has absorbed, to a very significant extent, the costs borne by Chinese fibreglass manufacturers.

Without the corrective action of the measures, Chinese fibre products will unfairly and anti-competitively undercut UK made fibreglass.

The UK glass industry welcome international competition, but this must be on a fair and level playing field. This is why, for instance, we do not object to imports from countries with like, market economies, where producers face the same competitive challenge as UK industry.

Chinese producers have sought to aggressively import in to European markets over recent years. We therefore believe it is a near certainty that should measures cease to apply, then dumping is likely to occur.

3. Do you think there would be injury to the UK industry if the existing anti-dumping/countervailing measures for the goods subject to review no longer applied? Provide any information supporting your conclusions including what the cause of this injury would be. You can refer to our [guidance on how we assess injury](#) for a definition of injury.

If the measures were to no longer apply, we believe there would be substantial injury to the UK industry.

Removing the existing measures would enable Chinese imports at a substantially reduced price. They would be subject to the standard third-country duty under the



UKGT, of 7.00%. This compares to current anti-dumping and anti-subsidy duties imposed on Chinese fibreglass in excess of 20%. The price of Chinese fibre, not subject to these measures, would substantially undercut the price charged by UK producers, rendering them unable to compete.

Without a level playing field, UK industry cannot compete with state subsidised producers in the PRC. TRID should note that the European Commission has, in its trade defence investigations over the last decade, reached the same conclusion vis a vis EU industry. We do not believe that there is any evidence which suggests a different conclusion should be reached on this occasion.

The level of injury which the UK fibreglass industry would be subject to should the measures cease to apply is significant. The threat posed to jobs and investment is not limited solely to the UK's single fibreglass producer, Electric Glass Fiber (EGF). The threat of injury extends well beyond a single company, to a network of local and national businesses supporting EGF's activities. *We will further discuss the impact on the UK economy in answer to the next question.*

The UK glass industry is not one in decline. In recent years, significant investment has been made, and more is planned. UK glass manufacturers are investing extensively in R&D as they look to move towards more sustainable, net zero operations. Despite being foreign owned (Japanese), significant investments have been made in EGF. Shortly after their acquisition, investment was made in rebuilding a glass furnace. **FORWARD LOOKING STATEMENT REDACTED**

4. Please provide any information about the possible economic effects on the UK if the existing anti-dumping/countervailing measures on the goods subject to review were no longer applied.

The goods subject to review are materials which will be critical in developing a sustainable, decarbonised economy over the coming decades. Fibreglass is central to products such as wind-turbine blades and automotive components, including for electric vehicles.

The UK Government's *Ten Point Plan for a Green Industrial Revolution*, published in late 2020 cannot be achieved without fibreglass composites.

- *Point 1, 'Advancing offshore wind'* commits to quadrupling the UK's offshore wind generation capacity by 2030.
- Fibre rovings are critical component in the manufacture of wind turbine blades.
- A strong domestic supply chain for blade production is possible, with manufacture of blades and their fibre components taking place in the UK.
- *Point 4, 'Accelerating the shift to zero emission vehicles'* will see the phasing out of new petrol and diesel fuel cars by 2030. The rise of electric cars will require continued research and development of light-weighting solutions to help improve vehicle efficiency.



- Fibre based products can deliver light-weight, high-strength products, ideal for application in the automotive sector.

As our reliance on fibre composite products grows, it is essential that a domestic manufacturing base is maintained.

The UK's sole producer of fibreglass, EGF, is based close to Wigan, in north-west England. EGF are based in and around areas which fall in to the 10% most deprived in England, according to the UK Government's 2019 [Indices of Multiple Deprivation](#). Data from the Office for National Statistics ([Nomis – official labour market statistics](#)) also indicates that Wigan has below average earning versus the rest of the North West, and GB overall. EGF employ a highly skilled workforce, and inform British Glass that their staff are competitively remunerated. Any injury to EGF puts at risk well paid, highly skilled jobs in an area of relative deprivation, low pay and above average claimant count.

As the UK Government pursues its stated policy of 'levelling up' the most deprived areas of the country (e.g. Wigan and other areas of the north of England), there is fantastic potential for new jobs and investment in UK manufacturing to help enable this. The glass industry wants to invest, create jobs and grow in the UK. Maintaining the measures would help to enable this, ensuring UK producers can compete on a level playing field. Were the measures to no longer apply, jobs and investment are threatened and 'levelling-up' becomes harder to achieve.

EGF are a significant employer, supporting a skilled and diverse workforce. The threat of injury posed if measures cease to apply places jobs and livelihoods at risk. Removing measures threatens to increase unemployment and reduce business investment in Wigan, and surrounding areas such as Greater Manchester. Even more significantly, the threat to jobs and livelihoods extends beyond EGF. EGF inform us that in terms of the employment they support, there are ten-times more jobs supported indirectly by EGF than the number they direct employ. British Glass concur with this, finding that while the UK glass industry (all sectors) directly employ 6,000 staff, the industry supports more than 150,000 in the wider supply chain.

These striking statistics illustrate the profound knock-on effect that not maintaining these measures could have on the wider local and regional economy in the vicinity of EGF's operations. This effect has been well documented in areas across the UK when major employers, such as steel producers, have gone out of business. Whilst the UK fibreglass sector might not operate on the same scale, the potential harm remains significant. Injury to the UK fibreglass industry will result in injury to the wider supply chain supporting its operations, from maintenance and engineering firms, to hospitality and business service companies.

It would be an act of immense harm and neglect to remove protections from an industry supporting skilled, well paid jobs and investment in one of the most deprived areas of England.



5. If you have any other information which may help us with this review, please provide it below.

Nothing further to add.



SECTION B: Next steps and declaration

Next steps

Once you have completed all parts of the questionnaire, the declaration below should be signed by an authorised official of your company. Please submit this questionnaire and any other additional submissions you consider relevant for this transition review through the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **10th May 2021**.

Please submit both a confidential and non-confidential version of the questionnaire. Further information on what can be considered confidential and how to prepare a non-confidential version of this questionnaire can be found in our guidance on [how to submit information](#).

Declaration

By signing this declaration, you agree that all information supplied in this questionnaire is complete and correct to the best of your knowledge and belief and understand that the information submitted may be subject to verification by the Trade Remedies Investigations Directorate.

Company name: **British Glass Manufacturers Confederation**

28.05.21

Date

REDACTED

Signature of authorised official

REDACTED

Name and title of authorised official