



Trade Remedies
Authority

Recommendation to Secretary of State

Case TD0027

Transition Review of anti-dumping measures applying to Ceramic Tiles originating in the People's Republic of China (PRC)



Contents

SECTION A:	Introduction	3
SECTION B:	Summary and finding	5
SECTION C:	Background	13
SECTION D:	The goods and like goods	26
SECTION E:	The UK industry and market	39
SECTION F:	Likelihood of dumping assessment	45
SECTION G:	Likelihood of injury assessment	57
SECTION H:	Economic Interest Test (EIT)	74
SECTION I:	Findings and recommendations	96
Annex 1:	Applicable rates of duty	99
Annex 2:	Information from participants in the review	103



SECTION A: Introduction

1. This section briefly summarises the legal framework for this Final Recommendation to the Secretary of State for Business and Trade (the Secretary of State) and the Trade Remedies Authority (TRA)'s main findings. The background to the review (see also **Section C: Background**) and further detail on all aspects are explained more fully in the remaining sections.
2. This document sets out our recommendation and the essential facts on which we have based our recommendation. It should be read in conjunction with other public documents available for this case on the [public file](#). Its purpose is to set out our recommendation to the Secretary of State.
3. For further guidance and information regarding transition reviews please see our [public guidance](#).

A1. Legal framework

4. This recommendation is made pursuant to regulations 100(1), 100(2)(a)(i)-(ii), 100A (extension) and 100B (partial revocation) of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019¹ (the Regulations). In accordance with regulation 100(2)(b) of the Regulations, this recommendation includes:
 - a description of the goods to which the recommendation relates;
 - the names of overseas exporters;
 - a summary of the review; and
 - the reasons for the recommendation.
5. In accordance with regulation 100A(2) of the Regulations, when making a recommendation to vary the measure, we must:
 - show that we are satisfied that the Economic Interest Test (EIT) is met;
 - have had regard to the current and prospective impact of the anti-dumping amount;
 - include the following information:
 - the anti-dumping amount;

¹ Statutory Instrument 2019/450, as amended.



- the goods to which the anti-dumping amount applies; and
 - the period for which the anti-dumping amount is to apply.
6. In accordance with regulation 100B(2) of the Regulations, we are required to recommend the appropriate date as the date the anti-dumping amount is revoked. The appropriate date is the day of expiry of the UK measure, which would have been the 24 November 2022.

A2. About this review

7. This is a transition review of a United Kingdom (UK) trade remedies measure under regulation 97(2)(b) of the Regulations. This UK measure gives effect to European Union (EU) Commission Implementing Regulation (EU) 2017/2179 of 22 November 2017².
8. This review concerns an anti-dumping measure applying to certain ceramic tiles originating in the PRC. The relevant UK measure is set out in the Taxation Notice 2020/18³ which gives effect to the EU trade remedies measures specified in the Notice of Determination 2020/18⁴. This transition review was initiated on 22 September 2022 and the [Notice of Initiation \(NOI\)](#) was published on that date.
9. The period of investigation (POI) for the review is 01 July 2021 to 30 June 2022. In order to assess injury, we have determined the injury period (IP) as being 01 July 2018 until 30 June 2022.

² European Union (EU) Commission Implementing Regulation (EU) 2017/2179 of 22 November 2017 is available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32017R2179&from=EN>

³ [Taxation notice 2020/18: anti-dumping duty on ceramic tiles originating in the People's Republic of China - GOV.UK \(www.gov.uk\)](#)

⁴ [Notice of determination 2020/18: anti-dumping duty on ceramics tiles originating in the People's Republic of China - GOV.UK \(www.gov.uk\)](#)



SECTION B: Summary and finding

B1. Interested parties and contributors

10. The following interested parties registered to this transition review:

Table 1: Interested parties and contributors

Name	Abbreviation	Country	Category
Norcros Group (Holdings) Ltd. trading as Johnson Tiles	Johnson Tiles	UK	Producer
Original Style Ltd.	Original Style	UK	Producer
Shackerley (Holdings) Group Ltd.	Shackerley	UK	Importer
Distribution Supplies Ltd.	Distribution Supplies	UK	Importer
Brick Development Association	BDA	UK	Trade Body
Ceramics UK (Formerly British Ceramic Confederation Ltd.)	CUK	UK	Trade Body
The Tile Association	N/A	UK	Trade Body
Guangdong Overland Ceramics Co., Ltd.	Overland	PRC	Exporter
Guangdong Jiamei Ceramics Co., Ltd	N/A	PRC	Exporter
Foshan Shiwan Yulong Ceramic Co., Ltd.	N/A	PRC	Exporter
Hangzhou Nabel China Co.Ltd	N/A	PRC	Exporter
Huida Sanitary Ware Co., Ltd	Huida	PRC	Exporter
Guangdong Huayanpinzhi New Material Co., Ltd.	N/A	PRC	Exporter
Foshan Wowland Building Material Co.,Ltd	N/A	PRC	Exporter
Tianjin Honghui Creative Technology Ltd.	N/A	PRC	Exporter
Fujian Nan'an Baoda Building Material Co., Ltd.	N/A	PRC	Producer
Monalisa Group Co., Ltd.	N/A	PRC	Producer
Guangdong Winto Ceramics Co., Ltd.	N/A	PRC	Producer
Foshan Sanshui Kito Ceramics Co.,Ltd.	N/A	PRC	Producer
Jingdezhen Kito Ceramic Co.,Ltd	N/A	PRC	Producer
Pingxiang Dacheng Ceramic Technology Co., Ltd.	N/A	PRC	Producer
Guangdong Xinruncheng Ceramics Co.,Ltd.	N/A	PRC	Producer
Guangdong Romantic Ceramics Co.,Ltd.	N/A	PRC	Producer
Qinyuan Gani Ceramics Co.Ltd	N/A	PRC	Producer
Guangdong Gold Medal Ceramics Co.,Ltd	N/A	PRC	Producer
The Ministry of Commerce of the People's Republic of China	MOFCOM	PRC	Foreign Government
China Chamber Of Commerce Of Metals, Minerals & Chemicals Importers & Exporters	CCCMC	PRC	Trade Body

11. This review additionally involves the following interested parties who have not registered to the case.

Table 2: Additional contributors

Name	Abbreviation	Country	Category
Ketley Brick Company Ltd.	Ketley	UK	Producer
Matclad Ltd.	Matclad	UK	Producer
Ibstock PLC.	Ibstock	UK	Producer
Forterra PLC.	Forterra	UK	Producer
Craven Dunnill & Co Limited	Craven Dunnill	UK	Producer

12. The following parties provided information relevant to this case, either by provision of a questionnaire response, a submission, or a response to TRA enquires or consultations:



Table 3: Information provided

Name	Abbreviation	Country	Category
Norcros Group (Holdings) Limited trading as Johnson Tiles	Johnson Tiles	UK	Producer
Shackerley (Holdings) Group Limited	Shackerley	UK	Importer
Guangdong Overland Ceramics Co. Limited.	Overland	PRC	Exporter
The Ministry of Commerce of the People's Republic of China	MOFCOM	PRC	Foreign Government
Ceramics UK (Formerly British Ceramic Confederation Ltd.)	CUK	UK	Trade Body
China Chamber Of Commerce Of Metals, Minerals & Chemicals Importers & Exporters	CCCMC	PRC	Trade Body
Craven Dunnill & Co Limited	Craven Dunnill	UK	Producer
Ibstock PLC	Ibstock	UK	Producer
Forterra PLC	Forterra	UK	Producer
Matclad Ltd	Matclad	UK	Producer
Ketley Brick Company Ltd.	Ketley	UK	Producer
Original Style Ltd.	Original Style	UK	Producer
Distribution Supplies Ltd.	Distribution Supplies	UK	Importer

13. Relevant non-confidential submissions are published and available on the [public file](#).

B2. Scope

14. Regulation 99A(2)(a)(ii) of the Regulations makes provision for the TRA to consider, within the conduct of a transition review, whether the goods or the description of the goods to which an anti-dumping amount is applicable should be varied.
15. The [NOI](#) describes the goods subject to review as:
- Glazed and unglazed ceramic flags and paving, hearth or wall tiles
 - Glazed and unglazed ceramic mosaic cubes and the like, whether or not on a backing.
16. The NOI additionally references five commodity codes related to the goods subject to review. The individual commodity codes and their definitions are further described in **Section D: The goods and the like goods**
17. The TRA received representations in respect of the description of the goods subject to review from a number of interested parties. We assessed the description of the goods to ensure that the scope of the measure remained appropriate for the UK-specific context.



18. During this assessment we publicly consulted⁵ and received responses⁶ regarding the description of the goods subject to review. Having considered the responses to consultation, and having conducted our assessment, we decided to recommend variation of the description of the goods subject to review. Although the commodity codes under which the goods subject to review are classified remain the same, the change in the description of the goods subject to review effectively changes the scope of the measure.
19. After the above assessment was concluded, but just before we published the Statement of Essential Facts (SEF), we received a submission from Distribution Supplies Limited (Distribution Supplies), a UK Importer of the goods subject to review. A non-confidential version of this submission is available on the [public file](#). These comments have been addressed in Section C6 along with comments received after publication of the SEF.
20. We recommend inserting 'finishing ceramics' to and removing 'glazed and unglazed' from the description of the goods subject to review, so as to ensure the description of the goods subject to review matches the description of the goods in the UK Trade Tariff and the World Customs Organisation (WCO) Harmonised System (HS) under commodity code 6907.
21. We additionally recommend varying the description of the goods subject to review so that it refers only to tiles that, individually:
 - have a surface area of equal to or less than 0.36m², or;
 - have no edge longer than 600mm, or;
 - have a differential relief⁷ on the largest surface greater than 3mm.
22. We have been explicit about the inclusion of non-structural brick slips within the scope of the measure.
23. The recommended variation in the description of the goods subject to review is outlined in **Section D: The goods and the like goods**. As varied, the description of the goods subject to review now reads:

⁵ See [Note to File published 20 July 2023](#)

⁶ Reference public responses to consultation here Responses received by [CCCMC](#) and [BCC](#).

⁷ 'Relief' here refers to a deviation from the background plane of the tile. A 'differential relief' is the difference between the lowest point relative to the plane and the highest point relative to the plane.



“Ceramic flags and paving, hearth or wall tiles; ceramic mosaic cubes and the like, whether or not on a backing; finishing ceramics

except tiles that, individually:

- have a largest surface area exceeding 0.36m² unless the differential relief on the largest surface exceeds 3mm.
- have an edge longer than 600mm unless the differential relief on the largest surface exceeds 3mm.”

B3. Applicability

24. The transitioned UK measure applies to all PRC exporters of the goods subject to review; however, the rate of duty is not constant across exporters. The residual rate of *ad valorem* duty is 69.7%. Six PRC exporters received individual rates of duty from the European Commission (the Commission) during its original investigation. The lowest of these rates was 13.9%, and the highest 36.5%. The non-sampled group of co-operating producers each received a rate of 30.6%. The applicable rates are detailed in **Annex 1: Applicable rates of duty**.
25. As we have been unable to recalculate the anti-dumping amount during this review, pursuant to regulation 100A(4)(b) of the Regulations, we recommend that the rates of anti-dumping duty are unchanged. The recommended rates are therefore the existing rates as detailed in **Annex 1: Applicable rates of duty**.

B4. Likelihood of dumping assessment

26. In accordance with regulation 99A(1)(a) of the Regulations, we assessed the likelihood that dumping of the goods subject to review would continue or recur if the measure were no longer applied to those goods (the likelihood of dumping assessment).
27. We determined that it is likely, on the balance of probabilities, that dumping of the goods subject to review would recur if the measure were no longer applied to those goods.
28. **Section F: Likelihood of dumping assessment**, details our dumping likelihood assessment.



B5. Likelihood of injury assessment

29. In accordance with regulation 99A(1)(b) of the Regulations, we considered whether injury to the UK industry in the like goods would be likely to continue or recur if the anti-dumping measure were no longer applied to the goods subject to review (the likelihood of injury assessment).
30. We determined that it is likely, on the balance of probabilities, that injury:
- would recur for UK producers of ceramic tiles if the anti-dumping amount were no longer applied to ceramic tiles that, individually:
 - have a largest surface area of equal to or less than 0.36m^2 , and;
 - have no edge longer than 600mm, or;
 - have a differential relief on the largest surface greater than 3mm.
 - would not recur for UK producers of ceramic tiles if the anti-dumping amount were no longer applied to ceramic tiles which, individually:
 - have a largest surface exceeding 0.36m^2 unless the differential relief on the largest surface exceeds 3mm, or;
 - there is an edge longer than 600mm unless the differential relief on the largest surface exceeds 3mm.
31. **Section G: Likelihood of injury assessment** details our injury likelihood assessment.

B6. Economic Interest Test (EIT)

32. Having considered all evidence gathered, including that presented by interested parties and contributors, and all factors listed in the legislation⁸, we have concluded that:
- the UK market for ceramic tiles is fragmented: it consists of a small number of UK producers and a large number of importing businesses;
 - ceramic tiles manufactured by UK producers are competing with imported ceramic tiles, but also with substitute products (for example, luxury vinyl tiles);

⁸ See paragraph 25 of Schedule 4 to the Taxation (Cross Border Trade) Act 2018 (as amended) (the Taxation Act).



- ceramic tiles are a very important product to UK producers and importers, a somewhat important product to upstream industries but not an important product to downstream industries;
- if the measure were to be varied as recommended, prices of ceramic tiles remaining subject to the measure are likely to be higher than they otherwise would be in the absence of the measure. The exception would be those larger tiles we recommend are removed from within the scope of the measure as a result of the variation to the description of the goods subject to review;
- availability of lower-priced alternatives and substitute products suggests that importers, downstream industries and consumers (groups that could benefit from the revocation of the measure) would not be disproportionately affected if the measure were to be varied as per our recommendation; and
- the UK industry would benefit if the measure were varied as recommended, because the measure would likely prevent a recurrence of injury to UK industry.

33. We therefore conclude that the application of the varied anti-dumping amount, by extending the duration of the measure, and the removal from the description of the goods subject to review of the larger tiles as defined subsequently in this Final Recommendation, meets the EIT.

34. **Section H: Economic Interest Test (EIT)** details our EIT.

B7. Final recommendation to the Secretary of State for Business and Trade

35. In accordance with regulation 100(1) of the Regulations, the TRA must make a recommendation to the Secretary of State, following a transition review, to vary or revoke the application of the anti-dumping amount to the goods subject to review.

36. We recommend variation of the application of the anti-dumping amount under regulations 100(2)(a)(i) and 100A of the Regulations, so that it applies to the goods subject to review imported from the PRC into the UK that:

- have a surface area equal to or less than 0.36m^2 , and;
- have no edge longer than 600mm, or;
- have a differential relief on the largest surface greater than 3mm.



37. We recommend this apply until 24 November 2027 – that is five years subsequent to the date when the measure would have otherwise expired (24 November 2022) had no transition review been initiated.⁹
38. We also recommend partial revocation of the measure pursuant to regulations 100(2)(a)(ii) and 100B of the Regulations, on larger formats of tiles, specifically tiles which, individually:
 - have a largest surface area exceeding 0.36m² unless the differential relief on the largest surface exceeds 3mm, or;
 - have an edge longer than 600mm unless the differential relief on the largest surface exceeds 3mm.
39. We recommend as the appropriate date for the partial revocation, the date of expiry of the UK measure, that is, as from 24 November 2022, pursuant to regulations 100(2)(a)(ii), 100B(2) and 94(1)(b)(ii) of the Regulations.
40. In the absence of suitable data to recalculate the anti-dumping amount, we recommend pursuant to regulation 100A(4)(b) of the Regulations that the rates of duty remain unchanged from those set out in Taxation Notice 2020/18. The rates we recommend are therefore those current rates detailed in Annex 1.
41. The TRA recommends that ‘finishing ceramics’ be added to, and ‘glazed and unglazed’ be removed from the description of the goods subject to review, so that the measure reflects the description of the goods contained within commodity code 6907 of the UK Trade Tariff and the corresponding WCO HS code.

⁹As detailed in [Taxation Notice 2020/18](#). See also regulation 97C of the Regulations.



42. The description of the goods would now reads as follows:

“Ceramic flags and paving, hearth or wall tiles; ceramic mosaic cubes and the like, whether or not on a backing; finishing ceramics

except tiles which, individually:

- have a largest surface area exceeding 0.36m^2 unless the differential relief on the largest surface exceeds 3mm, or;
- have an edge longer than 600mm unless the differential relief on the largest surface exceeds 3mm.”



SECTION C: Background

C1. Initiation of the transition review

43. The UK chose to maintain certain trade remedy measures once it was outside the EU's common external tariff. The then Department for International Trade (DIT) (now the Department for Business and Trade (DBT)) identified which measures were of interest to the UK following a call for evidence.
44. For each of these measures, the then Secretary of State for International Trade (now the Secretary of State for Business and Trade) (the Secretary of State) published a Notice of Determination, under regulation 96(1) of the Regulations, setting out the decision to transition the corresponding EU trade remedies measure, and a Taxation Notice, pursuant to regulation 96A(1) of the Regulations, on replacement of EU trade duty. We conduct transition reviews to determine if these measures should be varied or revoked in the UK.
45. On 31 December 2020, the Secretary of State published [Notice of Determination 2020/18](#) regarding the anti-dumping duty on ceramic tiles originating in the PRC, noting the decision to transition the EU anti-dumping measure so it continued to apply in the UK once the UK ceased to apply the EU's Common External Tariff. [Taxation Notice 2020/18](#) gave effect to the transition of the EU anti-dumping duty on ceramic tiles originating in the PRC to become an additional amount of UK import duty.
46. On 22 September 2022, the TRA published a [NOI](#) to initiate a transition review of the relevant trade remedies measure relating to ceramic tiles originating in the PRC. This NOI had the effect of initiating this transition review.

C2. European Commission measures

47. The Commission's previous measure¹⁰ was imposed on 8 October 2019 due to expire on 24 November 2022. On 22 November 2022 an EU [notice of initiation](#) launched an expiry review which [concluded on 12 February 2024](#).

¹⁰ <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019R1687&from=EN>



C3. Our transition review process

The transitioned measure

48. The EU measure transitioned into UK law, and set out in Notice of Determination 2020/18 and Taxation Notice 2020/18, took effect as a UK measure on replacement of EU trade duty. Under regulation 97C of the Regulations, this measure will continue to apply until the Secretary of State publishes a notice accepting or rejecting a TRA recommendation to vary or revoke the application of the anti-dumping amounts, following the conclusion of this transition review.
49. The transitioned measure applies to certain ceramic tiles from the PRC. The rates of anti-dumping duty which apply to the goods subject to review exported by the relevant companies are detailed in **Annex 1**.

Information from participants in the review

UK producers

Johnson Tiles

50. A pre-sampling questionnaire response was received from a UK producer of like goods, Johnson Tiles.
51. Johnson Tiles was invited to submit, and subsequently submitted, a full questionnaire response.
52. A non-confidential version of Johnson Tiles' [pre-sampling questionnaire](#) response can be accessed on our public file.
53. Johnson Tiles provided a [statement of reasons](#) detailing why the TRA should treat their information as confidential and why it was not possible to provide a non-confidential version of its full questionnaire response (see regulation 45 of the Regulations). No non-confidential summary of its full questionnaire response was provided.

Original Style

54. Original Style initially submitted a deficient pre-sampling questionnaire. The TRA sought to address the deficiencies with Original Style; however, a sufficient pre-sampling questionnaire response was not received.



Trade Remedies Authority

55. Notwithstanding the deficiencies in the pre-sampling questionnaire response, Original Style was invited to submit a full questionnaire response. No questionnaire response was received.
56. Original Style subsequently hosted the TRA at a facilitation visit to its manufacturing premises.
57. Ultimately Original Style provided a letter of evidence detailing its position in respect of this measure and this review. A [non-confidential version](#) of this letter is available on the public file.
58. In furtherance of obtaining industry information, we later obtained evidence from Original Style during a meeting in which we discussed its position in respect of this review. A [non-confidential summary](#) of the evidence provided by Original Style is available on the public file and further detailed in **Section E: The UK industry and market**.

Other UK Producers

59. The TRA received information from other domestic producers during this transition review. However, we were not initially able to translate this information into evidence. On 20 July 2023, we published a [note to the public file](#), in which we consulted on the description of the goods subject to review, and detailed deficiencies in our evidence base at that time.
60. Following this publication, it became clear that small and medium sized enterprises (SMEs), operating in the ceramic tile manufacturing sector within the UK, were unable to engage in this review in the manner in which the TRA had envisaged. An additional number of domestic producers did not formally register to the case on our online Trade Remedies Service, nor did they complete a pre-sampling or full questionnaire. We therefore sought to engage with the UK industry to obtain additional evidential material. **Section E: The UK industry and market** provides further detail.
61. Analysis in this review, to the extent that it refers to UK production and likelihood of injury, has been conducted with reference to the confidential verifiable data of the one verified UK Producer – Johnson Tiles. Additionally, we utilised qualitative data, obtained from other domestic producers during meetings. Written non-confidential summaries of the evidence obtained from these producers ([Original Style](#), [Craven Dunnill](#), [Ibstock](#), [Matclad](#), and [Ketley](#))



are available on the [public file](#) and further detailed in **Section E: The UK industry and market.**

Additional contributory evidence – Forterra

62. Forterra is not currently a manufacturer of the like goods. However, it has publicly stated¹¹ that it is making significant investment to manufacture like goods within the UK within the next 12 – 18 months.

63. We obtained evidence from Forterra during a meeting. A non-confidential [summary of the evidence](#) obtained is available on the public file and further detailed in **Section E: The UK industry and market.**

Sampling of UK Producers

64. It was not necessary to sample domestic producers, as only one domestic producer fully engaged with this review.

65. We have sought to engage as many UK producers as possible in order to obtain the best facts available.

PRC exporters

66. Eighteen PRC producers initially engaged with this review and submitted pre-sampling questionnaires. Of these eighteen, eight were exporting to the UK. The PRC producers are listed below, with those exporting detailed:

Overland	Exporting Producer
Guangdong Jiamei Ceramics Co. Ltd.	Exporting Producer
Foshan Shiwan Yulong Ceramic Co. Ltd.	Exporting Producer
Hangzhou Nabel China Co. Ltd	Exporting Producer
Huida	Exporting Producer
Guangdong Huayanpinzhi New Material Co. Ltd.	Exporting Producer
Foshan Wowland Building Material Co. Ltd.	Exporting Producer
Tianjin Honghui Creative Technology Ltd.	Exporting Producer
Fujian Nan'an Baoda Building Material Co. Ltd.	Producer
Monalisa Group Co. Ltd.	Producer
Guangdong Winto Ceramics Co. Ltd.	Producer
Foshan Sanshui Ceramics Co. Ltd.	Producer

¹¹ <https://www.thebusinessdesk.com/northwest/news/2096420-lancashire-firm-invests-12m-in-brick-slip-manufacturing-plant>



Jingdezhen Kito Ceramic Co. Ltd.	Producer
Pingxiang Dacheng Ceramic Technology Co. Ltd.	Producer
Guangdong Xinruncheng Ceramics Co. Ltd.	Producer
Guangdong Romantic Ceramics Co. Ltd.	Producer
Qinyuan Gani Ceramics Co. Ltd.	Producer
Guangdong Gold Medal Ceramics Co. Ltd.	Producer

Sampling of overseas exporters

67. The TRA sought to sample from the eight exporting producers¹² and on 16 November 2022 published a [notice of proposed sample](#) to the public file. This detailed that the TRA proposed to limit its examination to a sample comprising:

Overland
Foshan Shiwan Yulong Ceramics Co. Ltd.
Huida, and
Guangdong Jimaei Ceramics Co. Ltd.

68. The proposed sample was formulated on the basis that these exporters represented the largest volume of exports from the PRC to the UK that the TRA was reasonably able to investigate. The TRA sought to consult and invited comments on the proposed sample.

69. We received one comment on the proposed sample from Huida. It advised that it was unable to participate in this transition review due to the negative impacts of the COVID-19 pandemic upon its business. No other comments were received. On 8 December 2022 the TRA published its [decision](#) to remove Huida from the proposed sample to the public file.

70. Also on 8 December 2022, by separate [notice to the public file](#), the TRA published the final sample of exporters as:

- Overland,
- Foshan Shiwan Yulong Ceramics Co. Ltd, and
- Guangdong Jiamei Ceramics Co. Ltd

¹² See regulations 54(4) and 56 of the Regulations.



Trade Remedies Authority

71. Full exporter questionnaires were issued to the sampled exporters on 12 December 2022. The deadline for the return of completed questionnaires was 16 January 2023.
72. On 6 January 2023, Overland submitted an application for an extension to the questionnaire response deadline until 6 February 2023. This was granted.
73. Overland's full questionnaire response was received within the extended deadline. A [non-confidential version](#) of the questionnaire response is available on the public file.
74. On 13 January 2023 the TRA received a TRS communication from Foshan Shiwan Yulong Ceramics Co. Ltd, advising that it was not in a position to participate in this transition review due to the negative impacts of the COVID-19 pandemic upon its business. A [non-confidential version of this communication](#) is available on the public file. Nothing further was received from this party.
75. No further communication was received from Guangdong Jiamei Ceramics Co. Ltd.

Importers

76. A pre-sampling questionnaire response was received from a UK importer of ceramic tiles, Shackerley.
77. Shackerley was invited to submit, and subsequently submitted, a full questionnaire.
78. Non-confidential versions of Shackerley's [pre-sampling questionnaire](#) and full [questionnaire](#) can be accessed on our public file.

Foreign government

79. The Ministry of Commerce of the Peoples' Republic of China (MOFCOM) registered to participate in this transition review and submitted a registration of interest. A [non-confidential version](#) of this document may be accessed on the public file.
80. MOFCOM additionally submitted a subsequent response to the allegations of a Particular Market Situation (PMS) existing in the PRC ceramic tiles market, made by Johnson Tiles and BCC in their pre-sampling questionnaire



responses. A [non-confidential version](#) of this document may be accessed on the public file.

Other participants

81. Other interested parties and contributors participated in this review. The following trade associations registered their interest in the review and completed contributor registration forms:

[CCCMC](#)

[BCC](#)

[The Tile Association](#)

[BDA](#)

82. No post-registration submissions were received from The Tile Association or the BDA. Further representations and comments were received from CCCMC and BCC as the review progressed. The non-confidential versions of these submission are available on the [public file](#).

Meetings

83. CCCMC and Overland sought meetings with the TRA. Two in-person meetings were conducted on 4 July 2023 at Reading Town Hall. The first of these meetings involved both [CCCMC](#) and Overland. The second meeting was specifically to address [Overland's](#) concerns around recalculation. The information received from these parties is available on the public file.

C4. How we have used submitted data

84. Throughout this transition review, we have used submitted data as part of our evidence base upon which we have made our assessments and formed our conclusions. We have compared submitted evidence against the totality of relevant evidence available to us, both confidential and non-confidential – whether this is evidence submitted by other interested parties, taken from TRA data subscriptions, or publicly available data from governmental, industry and other sources.
85. We have also used submitted data to corroborate or gain a level of assurance on the accuracy, authenticity and/or relevance of that data itself, or other evidence either submitted to us or gathered by us.



86. Our ability to publish evidence behind our assessments was affected by Johnson Tiles providing us with a statement of reasons as to why its confidential questionnaire submission was not capable of being provided in a non-confidential format. A non-confidential version of this statement of reasons is available on the public file. We have therefore not been able to publish a non-confidential summary of its submitted data. Elsewhere in this document we refer to this explanatory section in situations where we would normally refer to non-confidential summaries of data received.

C5. Verification of data

Verification – overseas exporter

87. We assess that Overland's production is not representative of the production output of the PRC industry. We were therefore not able to recalculate the anti-dumping amounts. As Overland's data is not capable of being used, we took the decision not to engage in verification activities in respect of Overland's submission.
88. We received representations from Overland that it sought to be verified and provided with an individual rate. We advised Overland that we would not calculate an individual rate and therefore we would not engage in verification activities in respect of its information.

On site verification – UK producer

89. We checked submissions by the UK producer, Johnson Tiles, for completeness, consistency and whether the information was verifiable. We concluded that the submitted information was verifiable. There were some deficiencies, which were resolved by the conclusion of the verification process.
90. We visited Johnson Tiles between 28 June and 30 June 2023 to conduct verification activities. During the meetings, Johnson Tiles provided information and data relating to its accounting systems, sales and costs, processes, and source documents relating to certain transactions. We received updated information relating to injury factors during on-site verification after discussions. Details of the work carried out can be found in our [verification report](#) on the public file.
91. Following the verification activities undertaken, we have a reasonable level of assurance that data provided by Johnson Tiles can be treated as relevant and



accurate for the purpose of this review. The information was not complete, as sales data related only to sales of like goods in the UK that, if exported, would be classified under commodity code 6907230000. We requested information relating to Johnson Tiles' domestic sales of goods that, if exported, would be classified under other commodity codes within the scope of this measure, but it was not possible to obtain these within a timescale that would not significantly impact the delivery of this transition review. The TRA therefore agreed with Johnson Tiles the parameters of a subset of data that was acceptable in terms of content and timescales. In accepting a subset of data, that subset was no longer assessed as deficient for omission of data pertaining to sales of goods which, if exported, would be classified under commodity codes other than 6907230000. This presents difficulties in the extrapolation of data and the presentation of that data in this Final Recommendation, especially in respect of our likelihood of injury assessment. Where such difficulties exist, we have highlighted and addressed these in the text.

On site verification – UK importer

92. We checked submissions by the UK importer, Shackerley, for completeness, consistency and whether that information was verifiable. There were some deficiencies, which were resolved by the conclusion of the verification process.
93. We visited Shackerley's premises on 22 – 23 June 2023 June to conduct verification activities. During the meetings Shackerley provided information and data relating to its accounting systems, purchases / imports, sales and source documents relating to certain transactions. Details of the work carried out can be found in our [verification report](#) on the public file.
94. Uncertainty remained as to the status of non-structural brick slips within this measure at the time we carried out verification activities with Shackerley. Shackerley was of the opinion that the brick slips it imported were brick products rather than tile products. As such, verification activities did not include non-structural brick slips. In retrospect, this resulted in only a subset of data (imports of goods classified under commodity code 6907210000) being provided and verified. This situation was due to our then understanding of the status of non-structural brick slips within the measure, not as a result of any deficiency on the part of Shackerley. We have concluded that the omission does not have a significant impact on our ability to use the data in our assessments.



95. We have obtained sufficient assurance to conclude that the information provided by Shackerley is verifiable and that it is reasonable for us to treat the information as complete, relevant, and accurate for the purpose of this review.

Additional verification activities

96. We also had regard to evidence obtained from other interested parties and from secondary sources where such information was available, and where practicable, have undertaken verification activities using independent sources. This included, but was not limited to, official import statistics and data pertaining to relevant markets. Where data has not been considered to be verifiable, we have highlighted the areas and drawn conclusions where possible. Where we have received evidence in respect of UK production of like goods, we have, where possible, visited manufacturing facilities and confirmed production of those like goods.

C6. Statement of Essential Facts

97. The [SEF](#) was published on 19 February 2024 detailing the TRA's intended final recommendation.
98. On 04 December 2023, prior to the publication of the SEF, we received a [submission](#) via TRS from the importer Distribution Supplies. Due to the late arrival of these comments in the investigation, we decided to address these comments following the SEF comment period.
- In response to the SEF, we received two further submissions for consideration:
 - A [submission](#) via TRS by the trade body Ceramics UK (CUK) (formally the BCC) on 8 March 2024. This was further supported by [an email](#) on 17 April 2024.
 - A [submission](#) via the TRS by from Dentons LLP on 11 March 2024 on behalf of the CCCMC and Overland.
99. The TRA has carefully considered all comments received and notes the positions taken by respondents. Comments relating to the legality of transition reviews in general, the conduct of this particular review, and the representation of the wider industry in the review, although assessed, will not be addressed in this paper. The TRA follows UK legislation (the Regulations) when conducting transition reviews and has outlined clearly in this Final Recommendation evidence used and how assessments were made.



Adjustment of scope

100. All parties that provided comments on the SEF, Distribution Supplies, CUK and Dentons on behalf of the CCCMC and Overland, raised concerns around the threshold set for excluding larger-size categories from within the scope of the measure.
101. Distribution Supplies requested that we amend our wording in our recommendation to not only exclude tiles that are over 600mm x 600mm, but to lower this threshold to account for tiles slightly under, potentially down to 585mm x 585mm, allowing for rectification and a margin of error in production. Its argument is based on the fact that there is no manufacturing of tiles that are 600mm x 600mm in the UK.
102. Dentons requested that the TRA consider excluding products equal to and exceeding 600mm x 600mm, on the grounds that the UK does not produce ceramic tiles that are equal to 600mm x 600mm. It also requested that the TRA include the exclusion of products with any side exceeding 600mm, as this is in line with the British Standard.
103. In their two responses, CUK stated that the UK industry does not support any further reduction of the size of tiles excluded from the measure in the intended final recommendation made in the SEF. Their reasons were that “any attempt to reduce the size of tile would be motivated by an intention to circumvent the...tariff” and that “tiles over 600mm x 600mm...would be unlikely to cause injury to the UK industry on the basis that they are mostly used for external cladding” and “600x600mm or under...could be used as wall tiles and would compete, causing injury”.
104. Following the submissions presented, the TRA recommends including a reference to ‘any edge longer than 600mm’ to the description of the goods as this is included as a factor in BS 5385-3:2014 and is useful for identifying like goods not produced by the UK industry.
105. After further consideration of the requests and positions put forth by the above parties, the TRA is recommending to maintain the threshold between ‘ceramic tiles’ and ‘large ceramic format tiles’ as set down in the British Standard, which is tiles exceeding 600mm x 600mm. This would include tiles that are exactly 600mm x 600mm within the measure. This is because:



- BS 5385-3:2014 is a recognised standard and formed the framework for stakeholder consultations around what the UK industry could produce and what goods subject to review were likely to cause it injury.
- With the exception of a very small number of goods with a differential relief¹³ greater than 3mm, the size category 'ceramic tiles' as defined in BS 5385-3:2014 includes all UK-produced like goods for which we have received evidence.
- The UK ceramic tiles industry has confirmed that it accepts the exclusion of tiles larger than 600mm x 600mm from within the scope of the measure.
- Open source research indicates that 600mm x 600mm are generally the largest common tile held in stock by general DIY retailers. This supports the CUK's argument that 600mm x 600mm tiles are frequently bought for application to domestic walls and are therefore substitutes for domestically produced like goods.

Timings of the measure

106. CUK requested that any measure applied as a result of this investigation continue for five years from the date of its adoption in law rather than five years from the date when the previous measure expired as recommended in the SEF.
107. The UK statutory framework determines the date from which the measure is to apply for us, so the TRA will only be able to recommend measures to be in place for five years from the expiry date of the previous measure, *i.e.* until 24 November 2027

PRC production and exports

108. Dentons on behalf of CCCMC made reference to PRC production and exports declining in the context of increasing world production and trade. We have addressed this in paragraph 236.

¹³ 'Relief' here refers to a deviation from the background plane of the tile. A 'differential relief' is the difference between the lowest point relative to the plane and the highest point relative to the plane.



C7. Johnson Tiles announcement

109. On 26 April 2024, it was announced in the media that Johnson Tiles (who represent the majority but not the totality of domestic output of like goods) was in the process of being sold and the potential new owners have proposed closing its Tunstall manufacturing plant.
110. However, at the time of making this Final Recommendation, those plans have not been finalised and Johnson Tiles continues to manufacture like goods in the UK. Critically, Johnson Tiles manufactured like goods in the UK during the POI, 01 July 2021 to 30 June 2022.
111. As such, neither Johnson Tiles' announcement nor its potential ramifications for the UK industry, if and when they materialise, have been factored into our analyses and have not contributed to the findings of this transition review. We further note that Johnson Tiles is not the only UK producer of like goods, despite its size and share of the domestic UK market. This transitioned measure is expected to benefit the whole of the UK domestic industry in the like goods.



SECTION D: The goods and like goods

D1. Introduction

112. In this section we assess the goods subject to review, the like goods, our analysis and our recommendations in this regard. This is particularly important in this transition review, as we have received representations from a number of parties that the description of the goods subject to review should be varied.
113. The submissions received contended that the scope of this transition review was not suitable for the UK-specific context.
114. Regulation 99A(2)(a)(ii) of the Regulations makes provision for the TRA to consider, within the conduct of a transition review, whether the goods or the description of the goods to which an anti-dumping amount applies should be varied.

D2. Goods subject to review

115. ‘Goods subject to review’ are defined in Regulation 2 of the Regulations as “the goods described in the notice of initiation of a review under paragraph 1 of Schedule 3.”
116. The goods subject to review in this transition review are defined in the NOI as:
- Glazed and unglazed ceramic flags and paving, hearth or wall tiles;
 - Glazed and unglazed ceramic mosaic cubes and the like, whether or not on a backing.
117. The ‘goods subject to review’ references the commodity codes under which the goods subject to review are classified, which are also detailed in the NOI. The goods subject to review are specific to those goods exported from the PRC.

D3. Characteristics of the goods

118. The goods subject to review includes goods commonly referred to as ‘ceramic tiles’. Specifically, these include most wall, floor and mosaic tiles (collectively referred to here as ‘wall and floor tiles’) as well as non-structural brick slips. Each of these goods can be classified into the commodity codes detailed in the NOI.



Category codes

119. The NOI detail five commodity codes into which these tile goods can be classified.
120. The first three codes define tile goods by their moisture absorbency coefficient by weight.

Table 4: Category codes by moisture absorbency

Commodity code	Moisture absorbency coefficient by weight
6907210000	Not exceeding 0.5%
6907220000	Between 0.5% and 10%
6907230000	Not less than 10%

121. The remaining two categories are based on end use. Commodity code 6907300000 refers to mosaic cubes whether or not on a backing and commodity code 6907400000 refers to finishing ceramics.
122. The relationships and definitions of these commodity codes are discussed below.

D4. Like goods

123. In our consideration of the goods subject to review under Regulation 99A(2)(a)(ii) of the Regulations, we conducted an assessment as to whether the scope of the measure remained valid for the UK-specific context, including whether the description of the goods affected by the application of the measure should be varied.
124. Shackerley, Overland and CCCMC requested that ceramic goods with a moisture absorbency co-efficient of less than 0.5% by weight (commonly referred to porcelain and classified under 6907210000) be removed from the scope of the measure. This was on the basis that these represented products widely traded within the UK which they argued were not produced domestically. They argued that these goods subject to review had no equivalent UK-produced like goods and could therefore not contribute to the likelihood of injury to the UK industry.
125. We confirmed that the majority of the UK's consumption of ceramic tiles were imported during the IP.



126. We confirmed that 65% of all tile goods imported to the UK during the POI had a moisture absorbency of co-efficient by weight of less than 0.5%.

127. We undertook an assessment of the like goods produced by the domestic industry.

UK domestic like goods

128. For the purposes of this transition review, and by reference to the goods subject to review, paragraph 7(1) of Schedule 4 to the Taxation (Cross-border Trade) Act 2018 (the Act) defines 'like goods' as:

- (a) goods which are like those goods in all respects; or
- (b) if there are no such goods, goods which, although not alike in all respects, have characteristics closely resembling those of the goods in question.

Commodity codes

129. Of the five commodity codes covered by the measure in this transition review, the TRA has confirmed that ceramic tiles which, if exported, would fall under commodity code 6907230000, were produced in the UK by Johnson Tiles. Johnson Tiles were unable to provide non-confidential summaries of their questionnaire responses but the TRA can confirm that these goods represent the majority of UK ceramic tile output during the injury period.

130. The TRA received evidence from Original Style, Craven Dunnill, Matclad, Ketley Brick, Ibstock and Forterra. Whilst this evidence could not be verified as it was given verbally, it indicated that:

- Examples were found of UK produced ceramic tiles which, if exported, would conform to one of each of the five commodity codes of this transition review.
- The majority of the UK domestic output of ceramic tiles was produced by Johnson Tiles during the IP.
- The majority of UK domestic output during that time, if exported, would have conformed to commodity code 6907230000
- The volume share of UK-produced goods during the IP which, if exported, would have conformed to category code 6907210000 was negligible.



131. In the context of low levels of UK production of goods conforming to certain commodity codes, the TRA assessed the functional and definitional relationships between goods of each of those categories.

Unidirectional functional interchangeability

132. The first three categories of goods (commodity codes 6907210000, 6907220000, and 6907230000) are defined by their water absorbency co-efficient by weight.

133. Moisture absorbency is a marker for the degree of vitrification of the ceramic fabric and therefore its impact, stress and thermal resistance. This applies to all tile goods, but is particularly relevant to wall and floor tiles which, being thin by definition, must derive much of their structural integrity from their material.

134. These differences in impact, stress and thermal resistance affect the end uses for which wall and floor tile goods can be used. Tiles destined for domestic wall use can be made using a porous bodied fabric with a higher absorbency rate. This makes the tiles lighter, easier to cut and, in many cases, cheaper to produce than less absorbent tiles.

135. Wall and floor tiles to be used on the floor or external surfaces must meet higher impact, stress and thermal resistant standards than those used on domestic walls. This generally requires a higher degree of vitrification as measured by a lower moisture absorbency coefficient by weight.

136. Superficially, a wall and floor tile from one of these three categories could be almost identical to an equivalent wall or floor tile from one of the others.

137. To this end, some goods with a lower moisture absorbency co-efficient by weight can act as functional substitutes for goods with a higher moisture absorbency co-efficient by weight, whilst the inverse is not true. We refer to this effect as unidirectional functional interchangeability.

138. We assess that, even were there to be no domestic production of goods which, if exported, would conform to commodity code 6907210000, imported goods from that category could act as substitutes for goods conforming to commodity code category 6907230000, which are produced by the UK domestic industry. This supports an argument that lower absorbency commodity codes should remain within the scope of this measure.

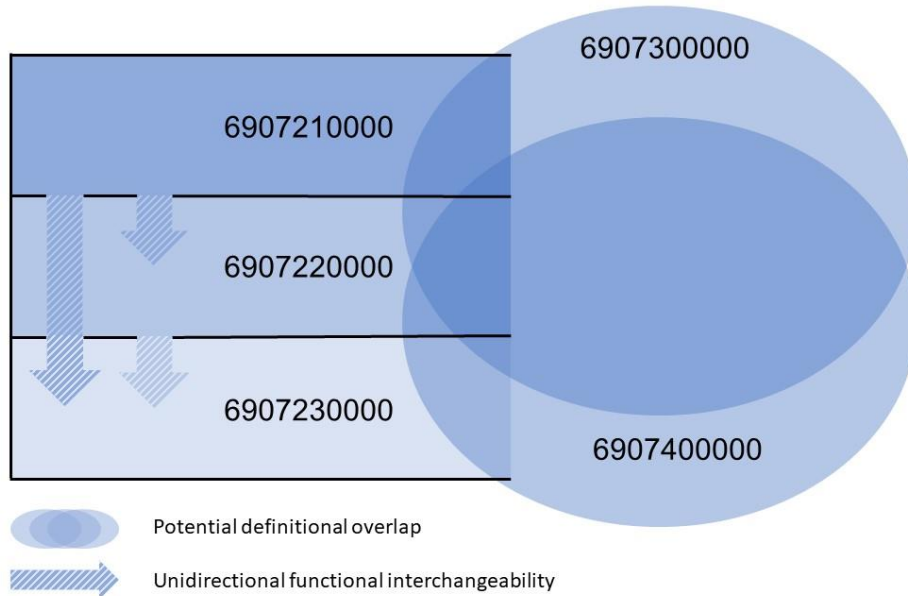


Definitional overlap

139. The remaining two categories (commodity codes 6907300000 and 6907400000) are defined by their end use.
140. Goods conforming to commodity code 6907300000 are described as “mosaic cubes whether or not on a backing”. In this context, mosaic cubes are rarely geometric cubes but the WCO’s Explanatory Notes to the Harmonised System indicates that mosaic cubes are ‘characterised by their small size’.
141. Several other jurisdictions define small as being no greater than 39cm², but there is no reference to size in the UK Trade Tariff in respect of mosaic cubes. As such, ‘small’ is open to interpretation.
142. Goods conforming to commodity code 6907400000 are described only as ‘finishing ceramics’. The WCO’s Explanatory Notes to the Harmonised System detail that finishing ceramics includes bordering, capping, skirting, frieze, corner or other fitting tile pieces employed as complementary elements for facing or paving work, with or without rounded edges, non-flat or 3-dimensional, which give them the character of finishing pieces; that would be the case, in particular, for bordering skirting, frieze, corner pieces, decorative inserts and other ceramic accessories. There is no further definition of ‘finishing ceramics’ contained in the UK Trade Tariff.
143. To this end we assess that there is considerable definitional overlap between commodity codes 6907300000 and 6907400000. Because all mosaic cubes and finishing ceramics could also be defined by their moisture absorbency coefficient by weight, we assess there is a degree of overlap between those two categories and the three categories defined by their moisture absorbency coefficient by weight.



Figure 1: Functional and definitional overlap



144. Combined with the unidirectional functional interchangeability discussed above, we assess that there is considerable definitional and functional overlap between the goods within the five categories of goods subject to this transition review.
145. Even were there no or limited UK production of goods in some of these categories, we assess that these overlaps demonstrate that the goods produced by the UK industry are like the goods subject to review, for each of the five categories discussed above.
146. We therefore assess that we cannot remove whole categories of goods from within the scope of this measure based on their moisture absorbency or definitional function.

Size categories

147. The TRA assessed the like goods produced by the UK domestic industry with regards to their size.
148. Various UK, EU and international standards apply to ceramic tiles. The most relevant to this transition review is BS 5385-3:2014, which classifies tile goods into three size categories:



- 'Ceramic tile' denotes product with a surface area of less than or equal to 3600cm² (0.36m²), with no tile edge greater than 600mm in length.
- 'Large ceramic format tile' is defined as a ceramic tile with a surface area greater than 3600cm² (0.36m²), with no tile edge exceeding 1200mm.
- 'Ceramic panel' is defined as a ceramic tile with a surface area exceeding 1m², with any tile edge exceeding 1200mm.

UK production

149. The TRA confirmed that the majority of UK production of like goods conformed to the size category of 'ceramic tile'.
150. The TRA confirmed UK production of like goods conforming to the size categories of 'large ceramic format tiles', but in all instances these goods had a differential relief greater than 3mm.
151. The TRA received no evidence of UK production of like goods conforming to the size category of 'ceramic panel'.
152. Early consultations with exporters, importers, trade bodies and domestic producers suggested that the imports of goods from larger size categories would be unlikely to contribute to the injury of the UK domestic industry save those instances where those imported goods had a differential relief greater than 3mm.
153. We compared the physical and commercial likenesses of each of these different size categories of goods subject to review to assess whether UK-produced like goods exist for them.

Physical likeness

154. We assessed the similarities and differences between the physical characteristic of the goods subject to review and the goods produced in the UK by reference to the size categories set out in BS 5385-3:2014. These characteristics included age, appearance, chemical composition, contents, grade/standards, purity / yield, quality, size / dimension, strength, taste and weight.



155. In the case of age, appearance, grade / standard, purity / yield, and quality we found no considerable difference between the goods contained within the size categories described by the British Standard.

Chemical composition, strength and weight

156. We assess that goods conforming to the size category 'ceramic tiles' can be made of any ceramic material and have confirmed goods in this size category from all three of the compositional commodity codes (6907210000, 6907220000, and 6907230000) being sold in the UK. As these goods exhibit a range of moisture-absorbance co-efficient by weight, goods in this category can be of varied strengths and weights.

157. We assess that 'large ceramic format tiles' are sometimes made of partially vitrified (as indicated by a moisture absorbency co-efficient by weight exceeding 0.5% but not exceeding 10%) but most usually fully vitrified ceramic material (as indicated by a moisture absorbency coefficient not exceeding 0.5%). We have no evidence of 'large ceramic format tiles' with a moisture absorbency coefficient by weight exceeding 10%. We assess that it is unlikely that goods within this size category would be manufactured using the more water absorbent, softer and lighter materials conforming to commodity code 6907230000.

158. We assess that 'ceramic panels' are made of fully vitrified ceramic material with a moisture absorbency co-efficient not exceeding 0.5%. We have no evidence of 'ceramic panels' made using ceramic materials with a moisture absorbency co-efficient exceeding 0.5%. We assess that it is unlikely that goods within this size category would be manufactured using the more water absorbent, softer and lighter materials conforming to commodity codes 6907220000 or 6907230000.

159. We assess these differences in material overlap manifest in a material difference between the goods of the three size categories as dictated by the British Standard. Goods produced in the larger two formats are produced exclusively using ceramic materials which are not mass produced by the UK domestic industry.

Commercial likeness

160. We assessed the similarities and differences between the commercial characteristic of the goods subject to review and the goods produced in the UK



by reference to the size categories set out in BS 5385-3:2014. These characteristics included end use, distribution channels, identity of customers, customers / downstream users view of interchangeability, competition, and price differences.

161. In the case of end use, distribution channels, identity of customers we found no considerable difference between the goods contained within the size categories described by the British Standard.

Interchangeability, competition and price difference

162. The TRA have assessed the interchangeability of goods from the three different size categories. In the abstract there is no functional difference between tiles from the three different size categories beyond the physical limitations of constituency detailed above. This said, we assess there are preferential and logistical differences between the goods that affect the degree to which they are interchangeable and compete with each other.

Consumer preference

163. We note that general DIY retailers generally only stock tiles conforming to the 'ceramic tiles' size category, with 600mm x 600mm wall and floor tiles being the largest size widely available in stock.
164. Some 'large ceramic format tiles' are available from these DIY retailers' websites and are widely available in specialist retailers. The TRA have verified that specialist retailers often also have displays of 'ceramic panels' (up to 1200mm x 1200mm), although these usually need to be ordered in and are rarely held in stock. This supports an argument that larger tiles categories represent more specialist goods which are unlikely to compete with like goods within the 'ceramic tiles' size category.

Project needs / design

165. The TRA assess that the needs of the end project will dictate the size of goods required. A large hotel lobby, an airport departure lounge or an external cladding system would be more likely to utilise 'large format ceramic tiles' or 'ceramic panels' by design. The same tiles or panels could be applied in smaller domestic setting, but would likely be more challenging to fit than more numerous, smaller tiles. This supports an argument that 'large ceramic format tiles' and 'ceramic panels' are more specialist goods which are less likely to compete with goods within the 'ceramic tiles' size category.



Price

166. There is considerable overlap between the prices of goods in the three size categories of goods, although there is a tendency of larger categories to be more expensive per m² than goods in the 'ceramic tiles' size category. TRA assesses that this is likely a function of a combination of limited consumer demand and the difficulties of handling and stocking larger tiles. Alone, there is not enough evidence to indicate whether different size categories of goods have intrinsic differences in prices, but the tendency towards larger categories being more expensive supports the argument that 'large ceramic format tiles' and 'ceramic panels' are specialist goods which are unlikely to compete with goods in the 'ceramic tiles' size category.

Conclusions on size categories

167. The TRA assess that there are physical and commercial differences between the goods from different size categories as defined by BS 5385-3:2014 and that these can be treated differently.

168. The TRA has confirmed UK production of like goods which fall within the 'ceramic tile' size category.

169. The TRA has no evidence of 'large ceramic format tiles' or 'ceramic panels' being produced by the UK industry with the exception of a small volume of specialist goods, all of which can be identified by having a differential relief of greater than 3mm.

170. The TRA assess that, for the goods subject to review conforming to the size categories 'large ceramic format tiles' and 'ceramic panels', there are no UK produced goods that are alike them in all respects. We assess that there are UK produced goods that have characteristics closely resembling goods subject to review that conform to the size categories 'large ceramic format tiles' and 'ceramic panels', but these always have a differential relief of more than 3mm.

Like goods conclusions

171. The TRA accepts that the majority of tile goods consumed in the UK are made of a material only produced by the UK domestic industry in extremely low volumes. We therefore assess that the majority of goods consumed by the UK market cannot be sourced domestically.



172. The TRA assess that there is a great deal of functional and definitional overlap between the different categories of goods subject to review with respect to their moisture absorbency co-efficient by weight and / or nominal end use. As such we are unable to remove subsegments of goods subject to review on the basis of these characteristics.
173. The TRA assess that there are material differences in the physical and commercial likeness of goods conforming to the three size categories defined by BS 5385-3:2014 and that these can therefore be treated differently.
174. The TRA assess that, save for where individual tile goods have a differential relief of more than 3mm, for goods subject to review conforming to the size categories of 'large ceramic format tile' and 'ceramic panel', no like goods are produced by the UK domestic industry.
175. Moreover, the UK industry have confirmed that goods conforming to these larger categories of goods would be unlikely to contribute to the injury of the UK industry were the measure to no longer be applied to them.
176. We therefore concluded that these goods should be removed from the scope of the measure by varying the description of the goods.

D5: Other variations of the goods description

177. In this part of the section, we detail our considerations of the description of the goods subject to review.
178. As discussed in paragraph 15 above, the current description of the goods is;
- Glazed and unglazed ceramic flags and paving, hearth or wall tiles;
 - Glazed and unglazed ceramic mosaic cubes and the like, whether or not on a backing.
179. The TRA assess that this definition should also contain the words 'finishing ceramics' but should not include the words 'glazed and unglazed'.
180. In the UK Trade Tariff and the WCO HS codes, "glazed and unglazed" are not included, and "finishing ceramics" are included, within the definition of this commodity code group (6907).



181. However, the description of the goods subject to review is taken from the description detailed on the NOI. The wording of the description on the NOI is taken from Notice of Determination 2020/18, and in turn, the wording on Notice of Determination 2020/18 is taken from the original EU measure (Commission Implementing Regulation (EU) 2017/2179) – where the words ‘glazed and unglazed’ are included, and ‘finishing ceramics’ are absent.
182. It is noted that finishing ceramics are goods subject to review and covered by the measure (they are classified under commodity code 6907400000), notwithstanding the omission of the words “finishing ceramics” from the product description.
183. We consider that the words ‘finishing ceramics’ should be added to the description of the goods, so as to align with the wording of the description in the UK Trade Tariff and the WCO Harmonised System under commodity code 6907.
184. As being ‘glazed or unglazed’ is a binary option, the inclusion of these words in the description of the goods adds nothing in this context. We consider that ‘glazed and unglazed’ should be deleted from the description of the goods, so as to align the description of the goods subject to review to the wording of the description in the UK Trade Tariff and the WCO Harmonised System under commodity code 6907.

D6: Conclusion on the goods and like goods

185. Having reviewed the goods subject to review and the description of those goods, and having considered comments received on the matter, we recommend that the description of the goods subject to review be varied to read as follows:

“Ceramic flags and paving, hearth or wall tiles; ceramic mosaic cubes and the like, whether or not on a backing; finishing ceramics,

except tiles which, individually:

- have a largest surface area exceeding 0.36m² unless the differential relief on the largest surface exceeds 3mm, or;
- which have an edge longer than 600mm unless the differential relief on the largest surface exceeds 3mm.”



Trade Remedies
Authority

186. The variation of the description of the goods subject to review will limit the extent of the application of the measure against the full range of goods classifiable under the relevant commodity codes.



SECTION E: The UK industry and market

E1. The UK industry

Production industry

187. The TRA has confirmed that the UK industry for ceramic tiles is comprised primarily of small and medium sized enterprises (SME) producing products which if exported would fall across all the commodity codes forming the goods subject to review (scope) and subject to this measure.
188. The one verified producer, Johnson Tiles, fully participated in this transition review. The TRA confirmed the UK industry opinion that Johnson Tiles is the only mass producer of UK-produced like goods at present and represents the majority of UK ceramic tile output. Johnson Tiles output, if exported, would fall within commodity code 6907230000.
189. Original Style and Craven Dunnill are smaller producers and, due to their size and composition, were unable to fully engage with this review by completion of pre-sampling and full questionnaires. Original Style's output, if exported, would fall within commodity code 6907220000 and 6907230000. Craven Dunnill's production output, if exported, would fall across all five commodity codes.
190. Matclad, Ibstock and Ketley are also producers of like goods that if exported would fall within commodity code 6907220000 (but could additionally reasonably fall within commodity code 6907400000). The product manufactured by these three producers (non-structural brick slips) was not initially identified as falling within the scope of this measure. As such their engagement was very late in the process of this review, and only as a result of these businesses being approached by the TRA. Even had the above producers been identified at the outset of this review, or had they been aware that their product was like the goods subject to review and within the scope of this review at the point of its initiation, we accept that these producers would likely have been in a similar position to Original Style and Craven Dunnill, in terms of their ability to fully engage in this review. This is because they did not have the capacity to engage in this review in the manner anticipated by the TRA.
191. Forterra is not currently a producer of ceramic tiles. They are principally a manufacturer of brick products, but they have made significant investment to



produce products like those imported under commodity code 6907220000 (non-structural brick slips) within the next 12-18 months.

Production methods

192. The verified UK producer, Johnson Tiles, manufactures by dry pressing.

193. Original Style manufacture by slip casting and wet pressing.

194. Craven Dunnill manufacture by slip casting and wet pressing / moulding.

195. Matclad manufacture by wet pressing / moulding, extrusion and cutting.

196. Ibstock currently manufacture by cutting but are making significant investment to produce by extrusion.

197. Forterra does not currently produce the like goods but is making significant investment to produce by extrusion.

198. Ketley manufactures by extrusion.

Changes in technology

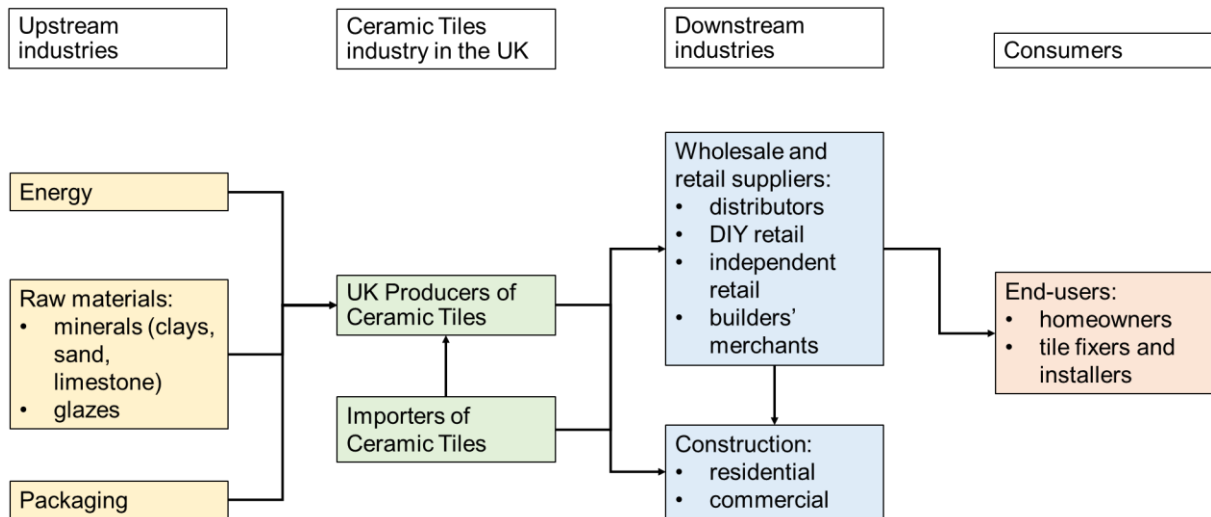
199. There has been no information received from interested parties and contributors in relation to changes in technology (to produce the goods subject to review), and no substantive changes in technology identified by the TRA, in relation to the production of ceramic tiles.

Supply chain overview

200. As shown in Figure 2, ceramic tiles are produced using energy and raw materials (minerals and glazes).



Figure 2: Supply chain for ceramic tiles



201. Main upstream industries in the supply chain for ceramic tiles include those that supply minerals (clays, sand and limestone) and glazes. In addition, energy suppliers and packaging suppliers are also among upstream industries in the supply chain for ceramic tiles.

202. In respect of downstream industries, producers of ceramic tiles sell to wholesale and retail suppliers, who subsequently sell to construction industry as well as end-users (homeowners, and tile fixers and installers). Producers of ceramic tiles do also sell directly to construction companies. Most sales of UK producers of ceramic tiles are to wholesale and retail suppliers, rather than direct sales to construction businesses or consumers.

End use

203. The end use of, and UK market for ceramic tiles is in construction. Construction is a significant sector in the UK economy with an estimated 1.4¹⁴ to 2.2¹⁵ million employees and an estimated GVA of £108 billion per annum¹⁶.

¹⁴ <https://www.ons.gov.uk/businessindustryandtrade/constructionindustry/datasets/constructionstatisticsannualtables> – 2020 dataset, tables 3.4 – 3.6

¹⁵ [Business population estimates 2020 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/business-population-estimates-2020) – detailed tables, table 5

¹⁶ <https://www.ons.gov.uk/economy/grossdomesticproductgdp/datasets/ukqdpolowlevelaggregates> - Table 2a (2021 GVA of £122 bn)



E2. The UK market

204. We reviewed the UK market for ceramic tiles.
205. We have not been able to confirm the scale of the UK market for ceramic tiles.
206. We reviewed both production output and domestic sales for UK-produced like goods by Johnson Tiles. In addition, we received estimates of output and / or sales value in meetings with other producers. However, the TRA is unable to detail this information without compromising confidential information provided to us by the UK industry.
207. We reviewed HMRC import figures which valued total imports of goods subject to review and like goods to the UK at between £263 million and £606 million per year during the IP. We note that this represents import values and not sales values, which would likely be higher.
208. The annual (2023) report and accounts of Topps Tiles Plc, which is the UK's largest tile specialist company whose principal business activities relate to the retail of ceramic tiles and related products¹⁷, states that the UK market for ceramic tiles is a large and fragmented market that is worth approximately £1.3 billion per annum.¹⁸
209. Topps Tiles Plc quotes data on the size of the UK market for ceramic tiles from a survey by Mintel, which is based on manufacturer and supplier data.¹⁹ The most recent UK Ceramic Tiles Market Report from Mintel estimates that the UK ceramic tiles market was worth £423.8 million in 2022 (at manufacturers' selling prices), up from £392.4 million in 2021 and £327.0 million in 2020.
210. Topps Tiles Plc estimates that at selling prices, the UK market for ceramic tiles in 2022 was worth approximately £800 million per annum, or £1.3 billion per annum when including adhesives, grouts and tools.
211. Topps Tiles Plc, using data from Mintel, states that the UK tile market is made up of 55% domestic sector and 45% commercial sector. Domestic sector is

¹⁷ Grouts, adhesives, spacers, tools etc. (not within scope of this measure).

¹⁸ Topps Tiles plc (2023) Annual Report and Accounts for the 52-Week Period Ended 1 October 2022, available at: <https://find-and-update.company-information.service.gov.uk/company/03213782/filing-history/MzM3MDk0MjU3OGFkaXF6a2N4/document?format=pdf&download=0>.

¹⁹ Mintel is a company whose principal business activities are the provision of market research-based information services. Mintel (2023) UK Ceramic Tiles Market Report 2022, available at: <https://store.mintel.com/report/uk-ceramic-tiles-market-report>.



defined as including the renovation, maintenance and improvement of residential properties. Commercial sector is defined as including commercial building projects and new built residential property (housebuilding).

212. In light of the information above, we deem this to be a reasonable appraisal of the UK ceramic tile industry, although we note that this would not likely include non-structural brick slips, which are frequently counted as part of the brick industry.

Trends

213. The TRA is unable to detail its findings regarding UK sales trends without compromising the confidential data provided to us by the UK industry.
214. The TRA was able to review trends in import data and note that there was an increase in the value and volume of imports of all categories during the IP, suggesting the demand for ceramic tiles remained strong during that period.

Interchangeability and competition between goods outside of scope

215. We considered interchangeability and competition with goods that could be described as 'ceramic tiles' but were not included within the scope of this measure. These included 'ceramic filler tiles and the like' (6904) and 'roofing tiles' (6905).
216. We are satisfied that the definitions of these goods were sufficiently clear, and they represent functionally different goods to the goods subject to review or the UK-produced like goods. We are satisfied that these goods are not interchangeable or competitors with the UK-produced like goods.

Consumer preferences

217. The TRA has limited data regarding consumer behaviour or preferences for ceramic tiles.
218. We note that the increase in import figures during the IP suggest that the demand for ceramic tiles in the UK remains strong.
219. We note the prevalence of dedicated ceramic tile retailers as well as the sizable selections of tile goods available through the large DIY and trade retailers.



These selections appear to be broader than most of the interchangeable functional alternatives available. This suggests that porous bodied wall tiles and ceramic / porcelain floor tiles are popular with consumers.

220. We note that we have limited data on the prevalence of non-structural brick slips, which are traded differently than the porous bodied wall tiles and ceramic / porcelain floor tiles discussed above. We note that the industry has suggested that these are growing in popularity as the UK construction sector moves towards more lightweight building methods. Whilst we cannot quantify this, Ibstock and Forterra's substantial investment into the production of non-structural brick slips suggests that the brick industry is willing to invest considerably in the future of these tile products.



SECTION F: Likelihood of dumping assessment

F1. Introduction

222. In accordance with regulation 99A(1)(a) of the Regulations, we have assessed whether the dumping of the goods subject to review would be likely to continue or recur if the anti-dumping amount were no longer applied to those goods.

223. Following the conclusion that it was not possible to recalculate the anti-dumping amount, we conducted the likelihood of dumping assessment, which we decided to do on a countrywide basis. The assessment considered the following at country level:

- continued dumping;
- production capacity;
- inventories;
- production levels;
- ability to shift production to the goods subject to review;
- market prices in the UK and the overseas exporters' market;
- exports to third countries;
- conditions in the overseas exporters' domestic market;
- attractiveness of the UK market to exporters;
- whether exporters have previously or habitually circumvented or absorbed the effects of trade remedy measures; and
- any other relevant factor.

224. We conducted this assessment to inform our determination as to whether the measure currently applying to the goods subject to review should be varied or revoked. We conducted the assessment to determine, on the balance of probabilities, the likelihood that dumping of the goods subject to review would continue or recur if the measures were no longer applied.

225. Information obtained from secondary sources including, but not limited to, HMRC and UN Comtrade, was used in accordance with the Regulations where primary data was not available.

226. HMRC uses commodity codes to separate different products. The commodity codes relating specifically to ceramic tiles and related goods are not adequately granular to segregate into the categories of tiles we have referenced as falling within the definitions 'ceramic tile', 'large ceramic format tile' and 'ceramic



panel' within BS 5385-3:2014. Our determinations on a likelihood of dumping are therefore applicable to all ceramic tiles within scope of this measure.

F2. Conditions for dumping

Continued dumping

227. The European Commission (the Commission) imposed anti-dumping duties on imports of the goods subject to review on 12 September 2011. On 22 November 2017, the Commission completed an expiry review and concluded to maintain the measures.

228. HMRC reported that imports of goods subject to review in terms of volume decreased 70% from 31,521,670 kg in 2018/19 to 9,520,479 kg during the POI. The import of the goods subject to review in the POI represented 0.77% of the total volume of UK imports of ceramic tiles.

Table 5: Imports of the goods subject to review in kg, 2018/19 to POI

	2018/19	2019/20	2020/21	POI
Volume of UK imports of goods subject to review (kg)	31,521,670	22,292,022	16,571,192	9,520,479
Index 2018/19 = 100	100	71	53	30
Volume of UK import of goods subject to review (% of UK imports of ceramic tiles)	4.58%	3.23%	1.74%	0.77%
Index 2018/19 = 100	100	71	38	17

Source: HMRC import data.

229. HMRC also recorded that the import of goods subject to review in terms of value decreased 55% from £10,116,901 in 2018/19 to £5,588,843 in the POI. The import of goods subject to review in the POI represented 0.92% of the total value of UK imports of ceramic tiles in that period.



Table 6: Imports of the goods subject to review in £, 2018/19 to POI

	2018/19	2019/20	2020/2021	POI
Value of UK imports of goods subject to review (£)	10,116,901	7,243,873	5,705,389	5,588,843
Index 2018/19 = 100	100	72	57	55
Value of UK import of goods subject to review (% of UK imports of ceramic tiles)	3.45%	2.76%	1.53%	0.92%
Index 2018/19 = 100	100	80	44	27

Source: HMRC import data.

230. Table 9 and 10 show that, following the extension of the measure in 2017, imports into the UK from the PRC of ceramic tiles dropped by 70% over the IP, while prices of goods dropped at a slower rate, 45%. Based on this information, it would appear that the measure has been effective in reducing imports of the goods subject to review into the UK over the IP, and also at increasing prices of goods coming from the PRC.
231. Due to PRC imports representing less than 1% of ceramic tile imports into the UK during the POI, and the case team not having representative data of domestic prices of ceramic tiles in the PRC, we are unable to conclude whether dumping has continued during the POI, however based on the analysis of imports during the IP, it is likely that dumping has not continued as imports have decreased and prices seemingly increased.

Production capacity

232. We have assessed submissions provided to us by a domestic producer and an interested party, as well as a report prepared by the European Commission dated 20 December 2017²⁰ on distortions of the economy of the PRC. Evidence derived from these sources shows that the spare production capacity of ceramic tiles in the PRC had grown from 20% in 2011 to 26% in 2014, and to 35% at the end of 2016.
233. Although the data pre-dates the IP, it provides context of the growth of the PRC industry prior to the current measure. A more recent report prepared by THINK!DESK China Research & Consulting, "[Final Report - Market Distortions](#)"

²⁰ [Commission Staff Working Document, on Significant Distortions in the Economy of the People's Republic of China for the Purposes of Trade Defence Investigations, 20 December 2017](#)



[in the Chinese Architectural Ceramics Industry](#)²¹, indicates that several PRC ceramic tile producers had announced throughout 2021 that they would make substantial investment totalling RMB 58.5 billion, approximately equivalent to £656 million²² to expand their production capacity. These included the construction of a ceramic tile and home furnishing industrial park and adding a significant number of new production lines.

234. Although this information cannot be verified, it shows through multiple sources, the historic growth of the ceramic tiles industry in the PRC, and the future plans to expand production further. A historic growing ceramic tile industry in the PRC and intentions to grow it further through investment supports an argument that the conditions for dumping may currently exist based on a continuously growing production capacity.

Production levels

235. Ceramic World Review has reported world ceramic tile production as being between 16 and 17.5 billion m² between the calendar years²³ 2018 and 2022, which covers the IP and POI. Of this, the PRC industry’s production represented between 43% and 51% making it the world’s largest producer of ceramic tiles. The second largest world producer, India, was responsible for between 11% and 14% of global production.

Table 7: Production levels

	2018	2019	2020	2021	2022
World production (x 1,000,000 m ²)	17,430	16,806	17,134	18,572	16,762
World production (Index 2018 = 100)	100	96	98	105	96
PRC industry production (x 1,000,000 m ²)	9,011	8,225	8,474	8,863	7,312
PRC industry production (Index 2018 = 100)	100	91	94	98	81

Source: [Ceramic World Review 153/2023](#)

236. Without representative data from PRC producers, we have limited data on which to base our assessment. However, the above table shows that, although world production and PRC production have both declined between 2018 and

²¹ [“Final Report - Market Distortions in the Chinese Architectural Ceramics Industry” dated 11 May 2022, Pages 13 - 14](#)

²² Using HMRC average rate in year 2021 with £1 to RMB 8.908242

²³ This information is only available in calendar years and is used for indicative purposes only.



2022, the PRC industry still represents approximately 44% of all ceramic tile production globally.

237. As shown below in Table 16, UK consumption of imports throughout the IP total 3,562,977,771 kg, of which UK domestic production only makes up a small percentage. This indicates that most of the UK consumption is fulfilled by imports. As the largest single producer of the goods subject to review, the PRCs production levels have the ability to flood the UK market with imports if the measure were revoked. On this basis, with regard to production in the PRC, we assess that the conditions for dumping exist.

Inventory

238. We assessed the inventory levels of PRC industry by reviewing unverified confidential data from a PRC producer and data obtained from secondary sources.

239. We found some evidence of year-end inventory levels decreasing prior to the POI, and then increasing during the POI. We assess that the decrease in closing inventory may be a result of COVID-19 restrictions during the IP²⁴, which may have adversely affected production in the PRC.

240. According to “[Final Report Market Distortions in the Chinese Architectural Ceramics Industry](#)” prepared by THINK!DESK China Research & Consulting²⁵, the finished product inventories of ceramic tiles reached RMB 31.2 billion at the end of 2020, approximately equivalent to £351 million, and had increased 7.2% compared to the year 2019. Although we cannot say how much of this is destined for the domestic or other markets, when comparing this against the total import value of ceramic tiles to the UK in 2020, which was £294,165,225, we found that the inventory levels in the PRC were 19% higher than the total UK imports value in year 2020.

241. We assess that the conditions for dumping may currently exist with regards to the substantial amount of inventory in the PRC. If the measure were revoked, this inventory could be exported to the UK, particularly without any restrictions in place to prevent dumping.

²⁴ <https://www.aa.com.tr/en/asia-pacific/china-imposes-covid-19-restrictions-in-foshan/2260238>

²⁵ [Final Report Market Distortions in the Chinese Architectural Ceramics Industry](#)



Ability to shift production to the goods subject to review

242. We have considered information from a UK producer and an unverified submission from a PRC producer. Both parties undertake similar processes of production, and we note that volume tile production facilities are specifically built to produce tiles in volume. Producers are unable to shift production of the ceramic tiles within scope of this review to other similar out-of-scope products, or vice versa.
243. At an advanced stage in the investigation and as a result of our enquiries, it became clear that non-structural brick slips fell under the definition of the goods subject to review and the like goods.
244. One method of non-structural brick slip production involves cutting one or more slips from an existing brick. This would change a good beyond the scope of this review into a good within the scope of this review. Additionally, non-structural brick slips could be produced more straightforwardly by extrusion.
245. We do not have evidence of PRC producers manufacturing slips in this way, but we do have evidence of UK brick manufactures doing so. We note that the equipment required to undertake this process is easily available and therefore it is possible that existing PRC brick manufacturers could switch to the production of goods subject to review if the incentives were present.
246. We note that this is a relatively slow and expensive process of manufacture that would be ill-suited to mass production and less likely to occur than other forms of production which would not be considered switching production.
247. On the balance of probabilities, the brick industry may have the ability to shift production to the goods subject to review, but we cannot make an evidenced-based assessment as to how likely that is. Furthermore, the tile industry cannot easily switch production to out of scope goods due to its volume production process. Based on the available evidence, we cannot make a positive or negative determination and assess this to be a neutral indicator in respect of the conditions for dumping existing.

Conclusion on conditions for dumping

248. Based on an analysis of imports from the PRC during the POI, we have concluded that dumping has likely not continued since the measure has been in place. We found some evidence that PRC exporters may be able to shift



production capacity to some of the goods subject to review, but some goods would be more difficult to switch to easily. Therefore we cannot make an assessment of whether the ability to switch production would indicate that the conditions for dumping exist.

249. Information we have suggests that the production capacity in the PRC has historically grown and future investment will ensure it continues to grow. There are sufficient production levels and inventories of the goods subject to review within PRC to allow PRC exporters to dump into the UK market should the incentives exist for them to do so. On the basis of this holistic assessment, we conclude that, on the balance of probabilities, the conditions for dumping exist.

F3. Incentives to dump

Market prices in the UK and overseas exporters' market

250. We received domestic prices from a PRC producer and considered treating these prices as being indicative of PRC domestic sales prices but assessed that this was not appropriate in this case. In particular, the sales prices provided were not necessarily representative of their sales on the domestic (PRC) market, because we do not know:

- what proportion of production is sold domestically (PRC), internationally (exports to third (*i.e.* not the UK) countries), and exported to the UK;
- what sales the price data we have been provided relate to (if it is all their sales, what (if any) other information is available to corroborate or substantiate their domestic sales prices);
- where the exporter sits in the PRC industry in terms of quality (if they are at the higher end of production, it may be that their prices are significantly higher than the average price of goods produced within the PRC industry); and / or
- how representative the sales prices are of the industry more broadly.

251. We also note that whilst UK producers and interested parties have alleged that a particular market situation (PMS) exists in the PRC, they have not supplied evidence to support the allegation.

252. Given the dumping margin is not being recalculated in this transition review, there is no requirement to assess PMS. The following analysis does not



consider the existence of a PMS or any other market distortions.

253. Unverified, confidential evidence we have seen suggests that PRC domestic prices may have been lower than the UK's domestic sales price throughout the IP. This could be taken to suggest that the PRC exporters may not have to sell at dumped prices to compete on price in the UK. However, the caveats above suggest that this comparison is not robust without using more detailed data.
254. Taken alone, this factor therefore does not indicate that price incentives exist for PRC exporters to dump to the UK. However, we are treating this factor with caution due to the limited data available. This factor is therefore neutral in our assessment of incentives to dump.

Exports to third countries

255. According to the trade remedies data portal of the World Trade Organisation²⁶, the European Union, the United Kingdom, the United States, and the Gulf Cooperation Council have a measure in place. Jurisdictions without measures in place include Philippines, Indonesia and the Republic of Korea.
256. We note that the prevalence of measures globally is high, which may suggest that PRC exporters of ceramic tiles do have a history of dumping. We also note that the UK is geographically surrounded by countries with measures in place. Were the UK measure to be revoked, the UK would likely become much more attractive than surrounding countries, given they have measures in place, and as a result trade may be diverted to the UK without the imposition of anti-dumping duties. We cannot assess whether this would lead to dumping or not, but we do note that the prevalence of measures in place suggests that PRC producers may have a history of dumping the goods subject to review.
257. On the balance of probabilities, we assess that PRC exporters of ceramic tiles do have a history of dumping and therefore the incentives to dump again may exist were the measure revoked.

Conditions in overseas exporters' domestic market

258. We did not receive any evidence from interested parties in relation to this factor, so we have relied on open-source research for this factor. We found that many

²⁶ Trade remedies data portal of World Trade Organisation [Antidumping investigation initiations - Trade Remedies Data Portal \(wto.org\)](https://www.wto.org/antidumping/investigation/initiations).



media sources reported the PRC economic outlook, and the property market was poor. Reuters reported that “Moody’s cuts China property sector’s outlook to negative” on 14 September 2023²⁷; BBC reported that “China suspends youth unemployment data after record high”²⁸ on 15 August 2023, and that “Evergrande²⁹ shares slide as mainland unit misses debt payment” on 16 September 2023³⁰. According to the Ceramic World Review³¹, the domestic ceramic tile industry in the PRC had contracted over 2022 by 17.5% in terms of production and an equivalent decline in consumption over the same period. The global market for ceramic tiles was forecast to continue to contract into 2024.

259. As the goods subject to review are one of the important materials used for property construction, the negative conditions in the PRC domestic market such as economic downturn, collapse of developers, over-supply of properties and high unemployment rates, as referenced in the sources we reviewed, would indicate a likely slowdown in the demand of ceramic tiles domestically. Domestic demand shrinking is likely to lead to PRC producers and exporters seeking international markets for their products.
260. On the balance of probabilities, we assess that the conditions in the overseas exporters’ domestic market support a positive assessment that the incentives for dumping of the goods subject to review exist.

Attractiveness of the UK market

Market size and growth

261. Market size and growth do not indicate that the UK is an attractive market. Due to the confidential nature of the data, we have used, we cannot reference the basis of this assessment in this Final Recommendation. We nonetheless conclude that market size and growth is a neutral indicator in our assessment of the UK as an attractive market.

Pricing

262. We have compared the average PRC import price of the goods globally to the import price of the goods subject to review from the PRC to the UK.

²⁷<https://www.reuters.com/markets/asia/moodys-cuts-china-property-sectors-outlook-negative-2023-09-14/#:~:text=Moody's%20said%20it%20expected%20contracted,defaults%20by%20cash%2Dsqueezed%20developers.>

²⁸ <https://www.bbc.co.uk/news/business-66506132>

²⁹ China Evergrande Group is a Chinese property developer.

³⁰ <https://www.bbc.co.uk/news/business-66920878>

³¹ [Ceramic World Review 153/2023](#)



Table 8: Unit price of UK imports of the goods subject to review versus unit price of third countries' imports of like goods, 2018-2021

	2018	2019	2020	2021
Import price from the PRC to UK (£/kg)	0.28	0.51	0.51	0.94
Index (2018 = 100)	100	182	182	336
Import price from the PRC to third countries (£/kg)	0.07	0.25	0.66	0.45
Index (2018 = 100)	100	357	943	643

Source: [UN Comtrade, World Integrated Trade Solution](#).

263. The UK import prices from the PRC were higher than the third countries' import prices from the PRC from 2018 to 2021. This suggests that the UK may be an attractive market for PRC exporters, as they may be able to sell at a higher price here than elsewhere. This contributes to an assessment that the incentives for dumping may exist.

Business environment and economic outlook

264. According to the British Chamber of Commerce³², overall UK economic growth is expected to be consistently low. They upgraded the 2023 GDP forecast from 0.3% to 0.4%. GDP growth in 2024, on the contrary, was downgraded from 0.6% to 0.3%. The low growth rate was attributed to high inflation and increase in bank interest rates.

265. The Monetary Policy Report of the Bank of England from August 2023³³ observed that there has been a decline in construction output in the UK owing to slowed business activity across the UK economy. The Monetary Policy Report noted that construction output remained at relatively low levels and had declined further due to softer demand and higher financing costs. It also noted that there was a modest increase in the number of construction firms entering insolvency procedures. Any slowdown in the construction industry is likely to lower demand for ceramic tiles. This may reduce the attractiveness of the UK market for PRC exporters and would be less of an incentive for PRC exporters to dump the goods subject to review in the UK.

266. However, while the outlook for UK economic growth may be low, we note that the UK business environment is positive, with the UK ranked 8th on the World

³² <https://www.britishchambers.org.uk/news/2023/09/bcc-economic-forecast-fragile-economy-stuck-in-first-gear/>

³³ Bank of England (2023) Monetary Policy Report August 2023, available at: <https://www.bankofengland.co.uk/monetary-policy-report/2023/august-2023> (accessed 13 September 2023).



Bank Ease of Doing Business Index³⁴. The British Pound is also 5th strongest currency globally, according to Forbes³⁵.

267. We would also note here that during this review, CCCMC and Overland met with the TRA in Reading. Representations received from these parties during these meetings and throughout this review sought removal of the measures, and if this were not to be possible, verification of Overland's data and calculation of an individual rate. It was apparent from this visit that there is significant interest from PRC exporters in the UK market.

268. We therefore conclude that the UK's modest economic outlook does not necessarily make it unattractive, given the UK's business environment and currency.

Circumvention and absorption

269. Due to a lack of data available or submissions made regarding this factor, it does not contribute to our assessment.

Any other relevant factor

270. The following additional factors are relevant in assessing whether dumping is likely to recur if the measure were no longer applied:

- i. Indications from importers are that they would import more of the goods subject to review if the measure were to be revoked because imports would be cheaper than UK-produced like goods.
- ii. Some producers stated that the downstream UK industry (large 'shed' importers) is likely to actively seek lower-priced products from PRC producers should the measure be revoked. This may suggest dumping could be facilitated by proactive interventions from the UK downstream industry.

271. On the balance of probabilities, these other relevant factors may suggest that dumping of the goods subject to review may be likely to recur if the measure were no longer applied.

³⁴ [Rankings \(doingbusiness.org\)](https://www.doingbusiness.org)

³⁵ [Top 10 Strongest Currencies In The World In 2023 – Forbes Advisor UK](#)



Conclusion on incentives to dump

272. We were unable to obtain reliable data to make a price comparison between UK and PRC prices. We were also unable to assess whether exporters have previously or habitually circumvented or absorbed the effects of trade remedy measures. These factors therefore have not contributed to our likelihood of dumping assessment.
273. We found that, on the balance of probabilities, exports to third countries, conditions in overseas exporters' domestic market and attractiveness of the UK market support a positive assessment that the incentives to dump the goods subject to review may exist. On the basis of this holistic assessment, we conclude that, on the balance of probabilities, the incentive to dump the goods subject to review exist.

F4. Conclusion on likelihood of dumping assessment

274. We conclude that, on the balance of probabilities, both conditions and incentives for dumping of the goods subject to review into the UK market exist. We therefore assess that, should the measures be revoked, dumping of all of the goods subject to review is likely to recur.



SECTION G: Likelihood of injury assessment

G1. Introduction

275. In accordance with regulation 99A(1)(b) of the Regulations, we are required to consider whether injury to the UK industry would be likely to continue or recur if the anti-dumping measure were no longer applied to imports of goods subject to review.

276. In order to conduct this likelihood of injury assessment, we considered:

- the current state of the UK industry;
- other factors affecting injury;
- undercutting and/or underselling of the UK industry;
- domestic and international market conditions;
- historic injury data; and
- any other relevant factors.

277. We conducted this assessment to inform our determination as to whether the measure should be varied or revoked. The assessment of the likelihood of injury was concluded on the balance of probabilities.

G2. The current state of the UK industry

278. In assessing the current state of the UK industry, we considered:

- actual and potential declines in;
 - sales;
 - profits;
 - output;
 - market share;
 - productivity;
 - return on investments, and;
 - production capacity;
- factors affecting the domestic price of the like goods;
- the magnitude of the margin of dumping;
- actual and potential negative effects on;
 - cash flow;
 - inventories;
 - employment;



- wages;
- growth; and
- the ability to raise capital or investments.

279. The TRA is unable to fully detail its findings against these 15 factors without compromising the confidential data provided to us by the UK industry. The following is a summary of our conclusions.

280. We assessed that nine of the 15 factors were positive indicators that the UK industry would be vulnerable to injury were the anti-dumping measure to no longer apply to the goods subject to review. These included: actual and potential declines in sales, profits, outputs, market share, return on investment and utilisation of capacity, as well as factors affecting the domestic price of like goods and actual and potential negative effects on employment and growth.

281. We assessed that six of the 15 factors were neutral indicators that the UK industry would be vulnerable to injury were the anti-dumping measure to no longer apply to the goods subject to review. These included: actual and potential declines in productivity; the magnitude of the margin of dumping; and actual and potential negative effects on cash flow, inventories, wages, and the ability to raise capital or investments.

282. We assessed that none of the 15 factors were negative indicators that the UK industry would be vulnerable to injury were the anti-dumping measure to no longer apply to the goods subject to review.

283. We therefore assess that the current state of the UK industry contributes to an assessment that the UK industry would be vulnerable to injury were the anti-dumping measure to no longer apply to the goods subject to review.

G3. Other causes of injury (non-attribution)

284. We assessed whether any other factors have caused or are causing injury to the UK industry.

COVID-19 pandemic

285. The domestic industry was affected by the national response to the COVID-19 pandemic.



286. In most cases UK manufacture and trading were stopped for a number of weeks in 2020. This had particular effect on volume manufacturers who make use of continual production lines which had to be shut down and restarted.
287. In most cases supply of raw materials and distribution of goods continued to be negatively affected for much of 2020. Imports of goods including like goods and goods subject to review continued to be disrupted throughout the IP.
288. The industry noted that the pandemic also affected customer purchasing behaviour, resulting in distortions in demand for building supplies.
289. These disruptive effects can be seen in most of the injury factors considered.
290. We assess that the COVID-19 pandemic was a considerable disruptive event which made the UK industry vulnerable to changes in trade flows and price pressure. However, the industry appears to have survived this event and we do not assess that the effect of the COVID-19 pandemic is likely to affect the industry in the future.
291. As a result, this factor does not prevent a conclusion that injury is likely to recur were the anti-dumping measure to no longer apply to the goods subject to review.

Wholesale energy prices

292. Wholesale energy prices were highly volatile in the period leading to and following Russia's invasion of Ukraine in February 2022.
293. Over the IP, the price paid by the UK industry for wholesale gas fluctuated considerably.
294. The Office of Gas and Electricity Markets (Ofgem) indicates that wholesale prices peaked in August 2022, declined, and then have remained stable since February 2023, at an average price level about twice those seen prior to 2020/21.
295. As the mass production of ceramic tiles is particularly energy intensive, changes to the wholesale price of gas will have a substantial effect on manufacturing costs.



296. We assess that whilst the volatility of the wholesale gas market has settled in the short term, the doubling of the ambient price per unit of gas in the long term will have a material effect on the cost per unit of manufacture. These costs must be borne by the industry or passed on to the consumer in the form of higher prices. This would make it more difficult to maintain market share and would make the UK industry vulnerable to the effects of increased and lower priced imports.
297. However, while rising energy costs may continue to make the UK industry vulnerable to downward pressure on prices in the future, e.g. from dumped imports, the impact of energy costs is not currently so great as to mean injury to the industry from dumped imports would not occur. We also do not expect the global conditions contributing to current energy costs to continue to worsen.
298. As a result, this factor does not prevent a conclusion that injury is likely to recur were the anti-dumping measure to no longer apply to the goods subject to review.

Imports from third countries

299. During the IP the UK imported 3,652,978 tonnes of ceramic tiles at a value of £1.53 billion across all five commodity tiles.
300. For context, during the same period, the PRC industry exported 79,905 tonnes at a value of £28,655,006. This ranks the PRC industry as the eighth biggest exporter of ceramic tiles to the UK, but still only grants it a market share of 1.9% of value and 2.2% of volume of total imports to the UK.

Table 9: Value of third country exports to the UK

	2018/19	2019/20	2020/21	2021/22
Spain	£107,941,980	£92,934,785	£118,144,284	£223,024,058
Italy	£56,824,109	£49,016,594	£53,176,990	£131,666,194
Turkey	£53,946,728	£52,971,628	£91,507,476	£98,832,970
India	£13,028,830	£16,430,796	£44,859,748	£56,256,300
PRC	£10,116,901	£7,243,873	£5,705,389	£5,588,843
Total Imports	£293,378,928	£262,892,400	£372,264,279	£606,047,512

Source: HMRC Trade data



Table 10: Volume (kg) of third country exports to the UK

	2018/19	2019/20	2020/21	2021/22
Spain	218,025,313	191,273,737	243,962,285	431,617,665
Italy	82,663,517	75,435,064	84,161,205	190,732,182
Turkey	183,491,964	180,459,668	306,010,266	285,529,599
India	48,814,759	62,013,567	149,961,542	133,560,063
PRC	31,521,670	22,292,022	16,571,192	9,520,479
Total Imports	688,380,306	691,140,864	952,805,962	1,230,650,639

Source: HMRC Trade data

301. The four biggest exporters of like goods to the UK – Spain, Italy, Türkiye and India – collectively accounted for 82% of import value and 80% of import volume during the IP. We note that all four rated in the 10 top manufacturing countries by Ceramic World Review in 2023.

302. All four of these industries demonstrated an increasing trend in both value and volume across the IP.

We are unable to discuss the size of the UK market or relative market shares without compromising confidential data provided to us by the UK industry. This said, we can assert that domestic production represents a relatively small proportion of total consumption of ceramic tiles in the UK.

Unit prices of imports

303. The unit prices of existing imports from the top four exporting industries exhibit a broad range from £0.31 per kg (Türkiye) to £0.67 per kg (Italy) over the IP.



Table 11: Prices of all categories of imports to the UK

	2018/19	2019/20	2020/21	2021/22
Spain	£0.50	£0.49	£0.48	£0.52
Spain (indexed)	100	98	98	104
Italy	£0.69	£0.65	£0.63	£0.69
Italy (indexed)	100	95	92	100
Türkiye	£0.29	£0.29	£0.30	£0.35
Türkiye (Indexed)	100	100	102	118
India*	£0.28	£0.28	£0.31	£0.44
India (Indexed)*	100	99	112	158
PRC*	£0.33	£0.34	£0.36	£0.61
PRC (Indexed)*	100	101	107	183
Total Imports	£0.43	£0.38	£0.39	£0.49
	100	89	92	116

Source: HMRC Trade data. Note, prices for India and the PRC above are adjusted to take into account the MFN tariff. The overall import price is based on unadjusted HMRC figures.

304. We note that the overall price of imports rose by 16% overall, with each of the four top exporters demonstrating either price stability or price rises during the IP.

305. This suggests the market is well established, relatively stable and stratified, with some exporters competing more on qualitative factors whilst others compete more on price.

306. We note that the current PRC import price sits towards the lower end of this spread despite relatively low levels of imports during most of the IP.

We are unable to discuss the prices of UK-produced like goods without compromising confidential data provided to us by the UK industry. This said, we assess that existing import prices create a competitive trading environment for UK-produced like goods.

Conclusions

307. We assess that the volume of trade and the competitive import prices of the top four exporters indicates that the UK is already a competitive trading market for ceramic tiles.



308. We assess that the four largest exporting countries have the scale to adapt to changes in demand and trade flows and can collectively compete more effectively on both price and quality than the smaller UK industry.
309. This would mean that it is likely that were goods subject to review to be imported in large volumes and at dumped prices, the four current largest exporters to the UK would likely be able to defend their market share at the expense of the UK industry's.
310. As such, we assess that the volume and prices of imported like goods from third countries contributes to the vulnerable state of the UK industry.
311. However, we do not assess that this contribution is so substantial as to prevent a conclusion that injury is likely to recur were the anti-dumping measure to no longer apply to the goods subject to review.

Interchangeability / competition between goods

312. The TRA assessed interchangeability and competition between the like goods sold in the UK and functional alternatives beyond the scope of this transition review.
313. We considered competition between some like goods and functional flooring alternatives including hardwoods, laminates, vinyl sheeting and luxury vinyl tiles. We note that these alternatives have sufficient practical and aesthetic differences so as to not be considered interchangeable. We therefore assess that the competition between like goods and functional flooring alternatives is largely based on consumer preference.
314. We considered competition between some like goods and functional internal wall covering alternatives including paint, wallpaper and waterproof lining boards. We note that these alternatives have sufficient practical and aesthetic differences so as to not be considered interchangeable. We assess that the competition between like goods and functional internal wall covering alternatives is largely based on consumer preference.
315. We considered competition between some like goods and functional external wall cladding alternatives including brick, wood, plastic, and metal. We note that these alternatives have sufficient practical and aesthetic differences so as not to be considered interchangeable. We therefore assess that the choice



between like goods and functional external wall covering alternatives is largely based on design or consumer preference and/or planning conditions.

316. We assess that whilst some functional alternatives can compete with like goods, there is insufficient evidence to suggest that these contribute to the vulnerability of the UK industry.
317. As a result, this factor does not prevent a conclusion that injury is likely to recur were the anti-dumping measure to no longer apply to the goods subject to review.

Conclusion on other factors affecting injury

318. The TRA assessed that during the IP, the COVID-19 pandemic, the wholesale cost of fuel and the effects of imports from third countries contributed to the vulnerable state of the UK industry.
319. The TRA assessed that during the IP, interchangeability and competition from functional alternatives did not contribute to the vulnerability of the UK industry.
320. Our assessment of these factors is that none were so substantial as to mean that injury to the UK industry caused by dumped imports would not be likely to recur.
321. We therefore conclude that other causes of injury will not negate any finding of likelihood of injury we may reach in this assessment.

G4. Undercutting of the UK industry

322. Price undercutting is where dumped goods are consistently priced lower than the like goods produced in the UK.
323. Price underselling is where dumped goods are consistently priced lower than the target price of the like goods produced by the UK industry.
324. In the event of undercutting, UK industry may be forced to reduce its prices to compete against the lower priced goods or risk losing market share. This may also prevent prices of like goods in the UK from rising to a level that the UK industry would otherwise achieve. These effects may also occur in the event of underselling.



325. We calculated approximated landed prices by dividing the total value of PRC imports of goods subject to review by total volume of imports during the IP. We compared these to an indicative UK sales price based on the domestic industry's total sales value divided by its total sales volume.
326. The TRA is unable to detail these price comparisons without compromising confidential data provided to us by the UK industry. The following is a summary of our conclusions only.
327. The TRA assess that it is likely that goods subject to review would undercut UK-produced like goods of the same category in the future were the anti-dumping measure to no longer apply.
328. The TRA assess that it is likely that this undercutting would suppress the prices of the UK industry.
329. We therefore conclude that undercutting of the UK industry contributes to an assessment that injury to the UK industry would be likely were the anti-dumping measure to no longer apply to the goods subject to review.

G5. Domestic and international market conditions

330. Domestic and international market conditions directly influence a variety of factors that contribute to the overall vulnerability of the UK industry and the likelihood that the UK industry would suffer injury were the anti-dumping measure to no longer apply to the goods subject to review.
331. To assess the potential trends in market conditions, we considered UK consumption and demand, international supply and demand, imports from third countries and interchangeability and competition between goods.

UK consumption and demand

332. The TRA has not been able to source complete figures for consumption or demand for ceramic tiles in the UK.
333. We have estimated UK consumption by combining HMRC import figures with UK domestic sales figures. We also estimated consumption for commodity code 6907230000 only, as several industry stakeholders have confirmed that this is the category under which most UK production of like goods would be categorised.



Table 12: Imports (kg)

	2018/19	2019/20	2020/21	2021/22
Total imports	688,380,306	691,140,864	952,805,962	1,230,650,639
(Index 2018/19 = 100)	100	100	138	179
Imports of 6907230000	114,917,738	108,589,229	156,853,053	202,828,494
(Index 2018/19 = 100)	100	94	136	177

334. The TRA is unable to detail this analysis without compromising confidential data provided to us by the UK industry. However, we confirm that UK industry output represented a relatively small proportion of UK consumed tiles.
335. We assess that overall UK consumption of ceramic tiles increased over the course of the injury period. We note that this trend is present both at the four-digit (commodity code 6907) and ten-digit (commodity code 6907230000) levels, reflecting the goods most commonly produced in the UK.
336. We are satisfied that the overall demand for ceramic tiles was strong during the IP.
337. Given the increase in demand and consumption experienced across the IP, our assessment is that this factor would not contribute to the vulnerability of the UK industry were the anti-dumping measure to no longer apply to the goods subject to review.

International supply and demand

338. The TRA has assessed international supply and demand and its effects on the UK ceramic tile industry.
339. Ceramic World Review has reported world ceramic tile production as being between 16 and 17.5 billion m² between 2018 and 2022³⁶. Of this, the PRC industry's production represented between 43% and 51%. For context, the second largest world producer, India, was responsible for between 11% and 14% of global production.

³⁶ Ceramic World Review's data is only available in calendar years and so is included for indicative purposes only.



Table 13: Production of ceramic tiles, 1,000,000 m²

	2018	2019	2020	2021	2022
World Production (x 1,000,000 m ²)	17,430	16,806	17,134	18,572	16,762
World Production (Index 2018 = 100)	100	96	98	105	96
World Production excluding the PRC (x 1,000,000 m ²)	8,419	8,578	8,627	9,476	9,450
World Production excluding the PRC (Index 2018 = 100)	100	102	102	113	112

Source: [Ceramic World Review 153/2023](#).

340. World production data indicates that there were fluctuations within the period with a peak in 2021 but an overall 4% decline in 2022 figures compared to 2018.

341. World production excluding the output from the PRC increased constantly during the period, ending 12% above 2018 figures. This indicates that the global decline in production was largely driven by the decline in the PRC.

342. 16% - 17% of global production was exported between 2018 and 2022. The export market fluctuated during the period but ended only 2% lower than figures at the beginning of the period.

Table 14: World exports

	2018	2019	2020	2021	2022
World exports (x 1,000,000 m ²)	2,815	2,831	2,771	3,013	2,770
World exports (Index 2018 = 100)	100	101	98	107	98
World exports excluding the PRC (x 1,000,000 m ²)	1,961	2,052	2,149	2,412	2,191
World exports excluding the PRC (Index 2018 = 100)	100	105	110	123	112

Source: [Ceramic World Review 153/2023](#).

343. The export market fluctuated during the period but ended only 2% lower than figures at the beginning of the period. If the PRC industry exports were excluded, total global exports increased over the period, ending 12% higher in 2022 than in 2018.



344. Despite a decline in production and exports over the period, the PRC industry remains the largest producer and exporter of tile goods worldwide. However, during the injury period it made up only 2% of UK imports.
345. Spain, Italy, Türkiye and India collectively provided over 75% of the volume of imports of like goods to the UK during the injury period. During that time each country increased both its total exports to the global market and its exports to the UK.
346. Together, these indicate a constant and substantial supply of ceramic tiles available for import to the UK.
347. We note that Ceramic World Review ranks the UK as the 10th largest importer of ceramic tiles worldwide.

Effect on the UK industry

348. We assessed market shares by comparing import volumes and UK industry sales figures to the consumption figures alluded to above.
349. The TRA is unable to detail this analysis without compromising confidential data provided to us by the UK industry. The following is a summary of our conclusions only.
350. We assess that international supply and demand conditions would contribute to the vulnerability of the UK industry were the anti-dumping measure to no longer apply to the goods subject to review.

Conclusion on domestic and international market conditions

351. The TRA assesses that the global tile industry and global tile markets are both substantial in scale and largely healthy.
352. We assess that the UK experienced a growth in demand for goods subject to review and like goods during the IP. This would support an assessment that the UK is an attractive and valuable market for overseas exporters.
353. We assess that international supply and demand conditions would contribute to the vulnerability of the UK industry were this measure to no longer apply to the goods subject to review.



354. We therefore assess that domestic and international supply and demand conditions would contribute to an assessment of vulnerability of the UK industry were the anti-dumping measure to no longer apply to the goods subject to review.

G6. Historic injury data

355. The TRA assessed whether the UK industry had suffered material injury in the past as a result of dumped imports and if / when this changed.

356. The original anti-dumping measure was imposed by the European Commission on goods subject to review on 12 September 2011 to prevent injury to the EU domestic industry, which then included the UK industry.

357. We have limited UK specific industry data from before the imposition of the measure.

358. As such this factor does not contribute to our conclusion of the likelihood of injury recurring were the anti-dumping measure to no longer apply to the goods subject to review.

G7. Any other relevant factor

Downstream factors affecting the likelihood of injury

359. Craven Dunnill and Original Style indicated that downstream retail pressures in the UK could increase the UK industry's vulnerability to injury were the measure to no longer apply to the goods subject to review.

360. They indicated that UK producers rely on independent retailers in order to sell much of their output.

361. They argue that independent retailers are dependent themselves on domestic and EU producers who are able to ship small volumes of highly diverse products by road.

362. They argue that were the anti-dumping measure to no longer apply to the goods subject to review, these would become available to UK retailers at relatively low prices. As these would have to be shipped in containers and by sea, this would favour large volumes of a relatively limited selection of goods per consignment.



363. Craven Dunnill, also an importer, indicated that even as a member of a tile buying consortia, it has struggled in the past to buy tiles in a volume that would make large sea-going consignments practicable. It argues that these consignments would likely be beyond the capacity of most independent retailers to handle.
364. Craven Dunnill argues that large multiple retailers with centralised warehouses and distribution networks would be able to handle these large consignments and that its centralised buying teams would be incentivised to seek out cheaper suppliers for its most common lines of tiles.
365. Craven Dunnill argue that this would lead to a further bifurcation of the market, with large multiple retailers being able to access the benefits of cheaper goods whilst independent retailers could not. This would lower the consumer price of goods available through the larger retailers and lead to a disproportionate increase in their competitiveness and ultimately their market share.
366. As UK producers rely on independent retailers for much of their sales, a decline in the market share of small retailers would have a direct effect on the sales of the UK industry.
367. As such, if the measure were no longer applied to the goods subject to review, it is likely that the expected buying behaviour of large importers would increase the vulnerability of the UK industry to injury.

Upstream factors affecting the likelihood of injury

368. Meetings with Matclad, Craven Dunnill and Original Style have indicated that each rely on a supporting industry of suppliers and specialists, many of which are small and medium enterprises.
369. This supporting industry has shrunk in tandem with a decline in the broader ceramic industry and is dependent on remaining producers for continued survival.
370. Craven Dunnill and Original Style indicated that they have already had difficulty in sourcing specialist materials and expertise from within the UK.
371. They noted that if the UK industry were to decline due to injury, much the remaining support industry could become unsustainable and many of these small businesses would be forced to close. This would make remaining



production more challenging and expensive as more materials and expertise would have to be sourced from abroad.

372. As such, if the measure were no longer applied to the goods subject to review, it is likely that the decline of the upstream support industry would make operating conditions for much of the remaining industry more difficult and would increase the vulnerability of the UK industry to injury.

G8. Conclusion on likelihood of injury assessment

373. As explained in **Section D: The goods and the like goods**, we have confirmed UK production of ceramic tiles that:

- have a surface area of less than 0.36m^2 , and;
- have no edge equal to or longer than 600mm, or;
- have a differential relief on the largest surface greater than 3mm.

374. In conducting this injury likelihood assessment, we confirmed that the UK industry does not produce ceramic tiles where:

- the largest surface area of which equals or exceeds 0.36m^2 unless the differential relief on the largest surface exceeds 3mm, or;
- there is an edge equal to or longer than 600mm unless the differential relief on the largest surface exceeds 3mm.”

375. We therefore confirm that these goods have not contributed to an assessment of injury to the UK industry were the anti-dumping measure no longer applied.

376. In assessing the current state of the UK industry, we observed that:

- nine of the 15 factors positively indicated a vulnerability to injury were the anti-dumping measure to no longer apply to the goods subject to review,
- six of the 15 factors returned a neutral indication of vulnerability to injury were the anti-dumping measure to no longer apply to the goods subject to review; and,
- none of the 15 factors negatively indicated a vulnerability to injury were the anti-dumping measure to no longer apply to the goods subject to review.

377. We assess that the positive indicators combined with the lack of negative indicators contribute to an assessment that the UK industry is vulnerable to



injury were the anti-dumping measure to no longer apply to the goods subject to review.

378. In considering other causes of injury, we did not identify any factors whose effect on the UK industry was so substantial so as to negate any findings of injury likelihood made in this assessment.
379. We concluded that during the IP, the effects of the COVID-19 pandemic, the wholesale cost of fuel and the effects of imports from third countries did contribute to the vulnerable state of the UK industry.
380. Despite limited imports from the PRC, we were able to undertake an undercutting analysis and found that undercutting had occurred during the IP and would be likely to continue were dumping from the PRC to recur.
381. The TRA assess that it is likely that this undercutting would suppress the prices of the UK industry.
382. Our analysis of domestic and international market conditions indicated that there was a large supply of ceramic tiles on the global export market during the IP and that UK demand grew whilst global demand appears to shrink.
383. We assess that the international supply and demand conditions during the IP would contribute to the vulnerability of the UK industry were the anti-dumping measure to no longer apply to the goods subject to review.
384. We assessed that historic injury data did not contribute to our conclusions of the likelihood of injury recurring were the anti-dumping measure to no longer apply to the goods subject to review.
385. We assessed that the buying behaviour of large-scale importers would increase the vulnerability of the UK industry to injury were the anti-dumping measure to no longer apply to the goods subject to review.
386. We assessed that the decline in the upstream support industry contributes to the vulnerability of the UK industry to injury were the anti-dumping measure to no longer apply to the goods subject to review.
387. It is the considered view of the TRA that, given our assessment as to the likelihood of recurrence of dumping in **Section F: Likelihood of dumping**



assessment above, and on the balance of probabilities, injury is likely to recur if the measure were no longer to be applied to ceramic tiles that:

- have a surface area of less than 0.36m^2 , or;
- have no edge equal to or longer than 600mm, or;
- have a differential relief on the largest surface greater than 3mm.

388. It is also the considered view of the TRA that, given our assessment as to the likelihood of recurrence of dumping in **Section F: Likelihood of dumping assessment** above, and on the balance of probabilities, injury is not likely to recur if the measure were no longer applied to ceramic tiles where:

- the largest surface area of which equals or exceeds 0.36m^2 unless the differential relief on the largest surface exceeds 3mm, or;
- there is an edge equal to or longer than 600mm unless the differential relief on the largest surface exceeds 3mm.”



SECTION H: Economic Interest Test (EIT)

H1 Introduction

389. Under Regulation 100A(2)(a) of the Regulations, if we make a recommendation to vary the application of the anti-dumping amount, we must be satisfied that this variation meets the EIT.

390. The aim of the EIT is to determine whether our recommendation to vary the measure and apply an anti-dumping remedy on the goods subject to review imported from the PRC is in the economic interest of the UK.

391. In accordance with paragraph 25(2) of Schedule 4 to the Act, the EIT is met in relation to the application of an anti-dumping remedy if the application of the remedy is in the economic interest of the United Kingdom.

392. In line with paragraph 25(4) of Schedule 4 to the Act, we have taken account of the following factors in conducting the EIT:

- the injury caused by the dumping of goods to the UK industry producing the like goods and the benefits to that UK industry in removing that injury;
- the economic significance of affected industries and consumers in the UK;
- the likely impact on affected industries and consumers in the UK;
- the likely impact on particular geographic areas, or particular groups, in the UK;
- the likely consequences for the competitive environment, and for the structure of markets for goods, in the UK; and
- such other matters as the TRA considers relevant.

H2. Evidence base

393. We received questionnaire responses from:

- one producer of ceramic tiles in the UK, Johnson Tiles, a division of Norcros Group (Holdings) Limited;
- one importer of ceramic tiles, Shackerley (Holdings) Group Limited; and



- one trade association representing all sectors of the UK ceramics manufacturing industry, CUK.

394. We have supplemented these submissions with background research and collated additional data and information from sources such as Companies House, Dun & Bradstreet, ONS (Nomis) and HMRC (Overseas Trade in Goods Statistics and Find UK Traders tool).

H3. Injury caused by dumping and benefits to UK industry in removing injury

395. The injury likelihood assessment concluded that if the existing measure were to be revoked, injury to the UK industry would be likely to recur because of increased competition from lower-priced imports of ceramic tiles from the PRC.

396. It is expected that the recommended measure will prevent the recurrence of injury to UK industry.

H4. Economic significance of affected industries and consumers in the UK

397. This section sets out the relative size and economic significance of the relevant industries and consumers within the ceramic tiles supply chain.

398. We have identified the following groups as potentially being affected by the recommended measure:

- Upstream industries: this group includes suppliers of energy, raw materials and inputs, as well as packaging. Inputs to production of ceramic tiles include body materials and glaze materials.
- UK producers of ceramic tiles.
- Importers of ceramic tiles.
- Downstream industries: this group includes retail and wholesale industry, as well as the construction industry.
- Consumers: they include professional tile fixers and installers, as well as homeowners.

399. For each industry group we selected businesses to analyse economic significance. For selected businesses we collected financial accounts data from Companies House, and Dun & Bradstreet to calculate employment, Gross



Value Added (GVA), Turnover, Earnings Before Interest, Taxes, Depreciation and Amortisation (EBITDA), and the EBITDA margin.

400. Using available evidence, we assessed the financial vulnerability of each industry group, as well as the importance of ceramic tiles to them.

Upstream industries

401. We identified 14 upstream businesses that supply raw materials and inputs to UK producers of ceramic tiles. Of these, we sampled four upstream businesses.
402. During the POI these sampled upstream businesses employed 451 workers, had a total GVA of circa £43m, turnover of £171m and an average EBITDA of £21m.
403. On average between 1% and 10% of sampled upstream businesses' turnover was linked to their sales to UK producers of ceramic tiles. Therefore, we concluded that ceramic tiles are somewhat important for upstream businesses.

UK producers of ceramic tiles

404. Ceramic tiles produced in the UK are manufactured by Johnson Tiles, Original Style, Craven Dunhill, Ibstock, Matclad, Ketley and smaller artisan producers.
405. Out of eight known UK producers of ceramic tiles, we collected financial data for three for which full financial accounts data were available. Data for smaller artisan producers was unavailable therefore we were unable to sample them.
406. We estimated that during the POI these sampled UK producers employed 2,574 workers, had a GVA of circa £198m, turnover of £596m and an average EBITDA of £122m.
407. We received data from the questionnaire response submitted by one UK producer only. Using this data we assessed that ceramic tiles are a very important product for this UK producer.
408. No other UK producers submitted quantitative data that we could use to assess the importance of ceramic tiles to their business. We nonetheless believe that ceramic tiles are a very important product and a primary business activity for UK producers that are engaged in the manufacturing of ceramic tiles in the UK.



Importers of ceramic tiles

409. Using the UK trader search tool of HMRC's UK Trade Info, we identified more than 2,000 businesses that recently imported ceramic tiles. It is likely that some of these importing businesses will be classed as Non-Established Taxable Person (NETP), a business who is not resident in the UK, does not have a UK establishment and is not incorporated in the UK.
410. We used trader data from HMRC to identify the top ten UK importing businesses of ceramic tiles. The list of top ten UK importing businesses was based on the frequency score of imports.³⁷ From among the top ten UK importing businesses, we selected seven for our sample. This sample consists of businesses, for which we could find full financial accounts data. We excluded certain importers from our sample based on the nature of their principal business activities. In particular, we decided that certain importers fit the description of a downstream business better (for example, that of wholesale and retail suppliers).
411. Shackerley, who participated in this transition review and submitted evidence, is considered to be a small company, which is not required to submit full financial accounts to Companies House. This means that we could not include Shackerley in our sample of UK importers.
412. We estimated that the sampled UK importing businesses employed 727 workers, had a total GVA of circa £46m, turnover of £177m and an average EBITDA of £18m.
413. To estimate the importance of ceramic tiles to the sampled UK importing businesses, we used trader data from HMRC and looked at how prevalent import transactions involving ceramic tiles were among all transactions during the POI. We concluded that ceramic tiles were a very important product for UK importers of ceramic tiles because more than 20% of transactions involved imports of ceramic tiles.

³⁷ If a trader recorded a transaction of all five types of ceramic tiles (classified under the commodity codes 69072100, 69072200, 69072300, 69073000, 69074000) in every month of the POI, their frequency score of imports would be equal to 60 (i.e. 5 commodity codes x 12 months = 60).



Downstream industries

414. The number of businesses comprising of downstream industries in the supply chain for ceramic tiles is likely to be large and varied in the nature and the size of their business: for example, large construction firms, large retailers, and small and independent tile shops and distributors.
415. We sampled eight businesses to analyse the economic significance of downstream industries. Often availability of full financial accounts data was a constraint for our analysis because many tile shops buying and selling ceramic tiles are likely to be small and medium sized enterprises.
416. During the POI these sampled downstream businesses employed 63,313 workers, had a total GVA of circa £2,589m, turnover of £11,765m and an average EBITDA of £1,055m.
417. We found that ceramic tiles were not an important product to sampled downstream businesses as less than 1% of their turnover was related to purchases of ceramic tiles.
418. It is important to note that downstream buyers are a diverse group of industries: for certain downstream businesses (in particular, small independent tile shops and distributors for whom we were not able to collect full financial accounts data) ceramic tiles are likely to be an important product.

Consumers

419. Ceramic tile consumers include homeowners as well as tile fixers and installers. We have no independently verified information on whether homeowners or tile fixers and installers are more prevalent among consumers (i.e. end-users) in the UK market for ceramic tiles.³⁸

Summary table

420. **Table 15** presents data on the economic significance of different industries, which could be impacted by the measure on ceramic tiles.

³⁸ Topps Tiles plc states that their customer base is made up of both commercial professional fitters (60% of sales) and domestic DIY customers (40% of sales). See: Topps Tiles plc (2023) Annual Report and Accounts for the 52-Week Period Ended 1 October 2022, available at: <https://find-and-update.company-information.service.gov.uk/company/03213782/filing-history/MzM3MDk0MjU3OGFkaXF6a2N4/document?format=pdf&download=0>.



421. Based on data, as discussed and as set out in the table, we find that ceramic tiles are an important product for the upstream industries, UK producers of ceramic tiles and importers of ceramic tiles. Ceramic tiles are not an important product for downstream industries, although there is likely to be variation between different downstream businesses.



Table 15: Significance metrics for the UK stakeholders potentially affected by the recommended measure

	Upstream industries	UK producers of ceramic tiles	Importers of ceramic tiles	Downstream industries
Sample details				
Total known business	14	8	Large number (more than 2,000)	Large number
Number of businesses selected	4	3	7	8
Sample statistics ^{a)}				
Total employment	451	2,574	727	63,313
Total GVA (£m) ^{b)}	43	198	46	2,589
Total turnover (£m)	171	596	177	11,765
Total EBITDA (£m) ^{c)}	21	122	18	1,055
Average EBITDA margin (%) ^{d)}	12.2%	20.5%	10.2%	9.0%
Conclusions				
Economic vulnerability (financial data) ^{e)}	Low	High	Low	Low
Estimated importance of ceramic tiles to this group ^{f)}	Somewhat important	Very important	Very important	Not important

Source: Questionnaire responses submitted by interested parties to TRA; [Companies House, 2023](#); [Dun and Bradstreet, 2023](#); [HMRC, trader data, 2023](#).



Trade Remedies Authority

Notes:

- ^{a)} The significance metrics were derived by taking weighted average of financial data of the sampled businesses for accounting period that covered the POI. For example, where a business reported financial data for a 12-month accounting period ending 31 December 2021, and a 12-month accounting period ending 31 December 2022, we gave both accounting periods an equal weighting of 50% to construct POI-representative data (where the POI covers period from 1 July 2021 to 30 June 2022).
- ^{b)} GVA (Gross Value Added) was calculated as follows: $GVA = \text{operating profits} + \text{employment costs (total employees remuneration and total directors' remuneration)} + \text{depreciation} + \text{amortisation}$.
- ^{c)} EBITDA (Earnings Before Interest, Taxes, Depreciation and Amortisation) was calculated as follows: $EBITDA = \text{operating profit} + \text{depreciation} + \text{amortisation}$.
- ^{d)} EBITDA margin was calculated as follows: $EBITDA \text{ margin} = EBITDA / \text{turnover}$.
- ^{e)} Economic vulnerability is assessed using financial data of the sampled businesses, including profitability (EBITDA and EBITDA margin), turnover and employment, and relevant trends over the injury period (from 1 July 2018 to 30 June 2022) and in more recent period (using most recent financial data available).
- ^{f)} The estimated importance of ceramic tiles to each of the industry groups was estimated using the comparison metrics, including turnover of the sampled businesses, as well as value of purchases of raw materials and inputs of UK producers and value of sales of ceramic tiles of UK producers.



H5 Likely impact on affected industries and consumers

422. In this section we assess the overall impact that the recommended variation of the measure might have on the affected groups identified. We do this by looking at how prices and quantities of goods in the ceramic tiles supply chain might change under two scenarios: (i) if the measure were to be varied as recommended, and (ii) if the measure were to be revoked. The possible impacts for affected industries and consumers are then considered and compared across the two scenarios.

Impact on prices and quantities if the measure were varied as recommended

423. If the measure were varied as recommended, we would expect prices of large ceramic format tile and ceramic panels from the PRC to fall and quantities imported to increase. This is because the description of the goods is being changed to exclude large ceramic format tile and ceramic panels (save for where the differential relief on those products exceeds 3mm), which are currently not manufactured in the UK.
424. We would not expect any changes to prices and quantities of other domestically produced and imported ceramic tiles (other than large ceramic format tile and ceramic panels) that would directly or indirectly relate to the trade remedy measure on ceramic tiles imported from the PRC. We also would not expect any changes on prices and quantities of upstream products and downstream products.
425. There could still be impacts on prices and quantities on products in the supply chain for ceramic tiles independent of the trade remedy measure. These impacts could be related to the UK economic performance: inflationary pressures could lead to higher prices of ceramic tiles and slow economic growth could lead to lower demand for ceramic tiles in the UK.

Impact on prices and quantities if the measure were to be revoked

426. The measure that currently applies on ceramic tiles from the PRC is an *ad valorem* duty that ranges from 13.9% to 69.7%. If this duty no longer applied, prices of ceramic tiles imported from the PRC could fall by between 12.2% and 41.1%. Lower prices of ceramic tiles from the PRC are likely to result in higher



demand for these ceramic tiles and increased volume of imports from the PRC to the UK.

427. The likely fall in prices and increase in quantity demanded for ceramic tiles imported from the PRC are likely to exert downward pressure on prices of ceramic tiles produced in the UK and imported from third countries. It is not certain, however, that these prices will actually fall to match the lower prices of ceramic tiles from the PRC. The ability to match the lower prices of ceramic tiles from the PRC by UK producers and importers of ceramic tiles from third countries will depend on their costs and their profit margins. Demand for UK-produced ceramic tiles and imports from third countries is likely to decrease if these become relatively more expensive relative to imports from the PRC.
428. The likely impact on prices and quantities (demanded and supplied) of ceramic tiles will be determined by the size of elasticities: elasticity of demand, elasticity of substitution and elasticity of supply.³⁹
429. If the measure were to be revoked, and if demand for UK-produced ceramic tiles goes down, this could also lower demand for and possibly prices of certain upstream products.
430. We do not expect that demand for and prices of downstream products (for example, kitchen and bathroom projects) will be significantly affected if the measure were to be revoked. Any benefits to downstream industries and consumers will depend on whether producers and importers will pass on lower prices of ceramic tiles (i.e. pass-through). Downstream industries and consumers already have a choice as to whether to use ceramic tiles from the UK, the PRC or third countries, or substitute products (including luxury vinyl tiles, wood, laminate, natural stone and carpet for floor, and with paint, wallpaper, panelling and mosaics for walls).

³⁹ Elasticity of demand will determine changes in overall quantity demanded in response to changes in prices. Substitution elasticity will determine changes in relative consumption of domestically produced and imported ceramic tiles as relative prices of these change. Elasticity of supply will determine suppliers' ability to alter supply in response to changes in prices. As an illustration, the US ITC have estimated these elasticities for the US: a) demand elasticity ranging from -0.75 to -1.25 (i.e. a moderately inelastic to moderately elastic demand); b) elasticity of substitution between domestically produced and imported ceramic tiles ranging from 4 to 6 (i.e. a high degree of substitutability); and c) supply elasticity ranging from 4 to 8 (i.e. a moderately elastic supply). We do not have evidence of the UK-specific elasticities of demand, substitution and supply, nor have we evidence to suggest that the UK-specific elasticities will be different from the US-specific elasticities. Limited amount of quantitative primary evidence that we received from questionnaire responses means that we are unable to use these estimates of elasticities to quantify and monetise the likely impact of the measure.



Likely impacts on affected industries and consumers

Upstream industries

431. We have previously found that ceramic tiles are a somewhat important product for upstream industries. We have also found that upstream industries were not in an economically vulnerable position.
432. If the measure were varied as recommended rather than revoked this could have a positive impact on upstream industries, who will likely see continued demand for their products (raw materials and inputs, including glazes, minerals, packaging and energy) from the UK ceramic tiles industry.
433. We have no evidence to suggest that there could be any disproportionately negative economic impacts of the measure on any upstream industries in the UK.

UK producers of ceramic tiles

434. The likely positive impacts on UK producers of ceramic tiles from the recommended variation of the measure derives from the reduction of the likelihood of recurrence of injury. This means that UK producers are likely to continue producing ceramic tiles and supplying them to the UK market.
435. We have previously assessed that UK producers of ceramic tiles are currently in an economically vulnerable financial position, so we consider it likely that UK producers could suffer from a likely recurrence of injury if the measure were to be revoked.
436. If the measure were revoked and if UK producers of ceramic tiles suffered from a recurrence of injury, this could lead to a worsening of their business' financial health, including lower turnover, lower profitability and profit margins, and could lead to a loss of jobs. In the worst-case scenario, if the measure were revoked, certain UK producers could decide to exit the UK market.
437. There is a concern that if certain UK producers exited the UK market, this could disrupt the existing supply chain for ceramic tiles in the UK. In particular, operations of upstream suppliers to UK producers of ceramic tiles (for example, suppliers of glaze) may no longer be economically viable. If this were the case, this could have a negative impact on those UK producers of ceramic tiles, who



currently want to continue their UK operations and manufacturing of ceramic tiles in the UK.

Importers of ceramic tiles

438. Using data for a sample of importing businesses, we have previously found that ceramic tiles are a very important product for UK importers. We, however, believe that there is likely to be heterogeneity between different importing businesses. In addition, we do not have any evidence to determine how the importance of ceramic tiles to UK importers differs depending on the country of origin of UK imports.
439. If the measure were varied as recommended, importers of large ceramic format tile and ceramic panels from the PRC (save for where the differential relief on those products exceeds 3mm) would face reduced costs of importation. Importers of other ceramic tiles from the PRC would incur additional costs of importation compared to what they would incur if the measure were to be revoked. These costs of importation, however, will be unchanged compared to what these importers are paying currently. The costs of importation will be unchanged for businesses that import ceramic tiles from countries other than the PRC.
440. If the measure were revoked, this could have a positive impact on importers of ceramic tiles from the PRC, who would be more likely to see their business grow. There could also be entries of new businesses that specialise in sourcing and importation of ceramic tiles from the PRC to take advantage of new market opportunities arising from lower costs of trade with the PRC. These possible entries of new importing businesses could exert additional competitive pressure on importers of ceramic tiles from third countries. These importers could be impacted negatively by the revocation of the measure.

Downstream industries

441. We recognise that variation of the measure could have a negative impact on downstream industries (construction industry, retail and wholesale industry), which will not benefit from lower-priced imports of ceramic tiles from the PRC unless they were buying large ceramic format tile and ceramic panels (save for where the differential relief on those products exceeds 3mm) . However, we do not consider it likely that the measure will have any disproportionately negative economic effects on downstream industries.



442. We recognise that there is likely significant variability between different downstream businesses in respect of how important ceramic tiles are to them. For example, ceramic tiles are likely to be important product for smaller and independent retailers that sell only ceramic tiles as opposed to larger DIY retailers that also sell other building and construction products.

Consumers

443. Ceramic tiles are a final consumer good, which are purchased by consumers (i.e. end-users, including homeowners, and tile fixers and installers). This means that the likely impacts of the measure on consumers are likely to be more pronounced than if the measure applied on an intermediate good.

444. The measure will entail additional costs on consumers of ceramic tiles, who will not benefit from lower-priced ceramic tiles from the PRC unless they were using large ceramic format tile and ceramic panels (save for where the differential relief on those products exceeds 3mm). These additional costs, however, are not likely to translate to any disproportionately negative economic impacts on consumers of ceramic tiles, who will be able to use lower-priced alternatives and substitute products, including ceramic tiles imported from third countries.



Table 16: Expected impacts on affected groups if the measure were varied as recommended rather than revoked

Group	Expected impacts
Upstream industries	Positive impact on upstream industries because of continued demand for raw materials and inputs used in production of ceramic tiles.
UK producers of ceramic tiles	Positive impact because the measure prevents the recurrence of injury to domestic producers.
Importers of ceramic tiles	Negative impact on importers of ceramic tiles from the PRC, who will not benefit from being able to source lower-priced products. Potential positive impact on importers of ceramic tiles from third countries, who are otherwise likely to face more competition from importers of ceramic tiles from the PRC in the absence of the measure.
Downstream industries	Negative impact on downstream industries (construction, retail, installers), who will not benefit from being able to source lower-priced ceramic tiles from the PRC unless they were buying large ceramic format tile and ceramic panels (save for where the differential relief on those products exceeds 3mm).
Consumers	Negative impact on consumers, unless they were using large ceramic format tile and ceramic panels (save for where the differential relief on those products exceeds 3mm), but possibly mitigated by availability of lower-priced alternatives and substitute products (ceramic tiles imported from third countries, luxury vinyl tiles).



H6 Likely impact on particular geographic areas or particular groups in the UK

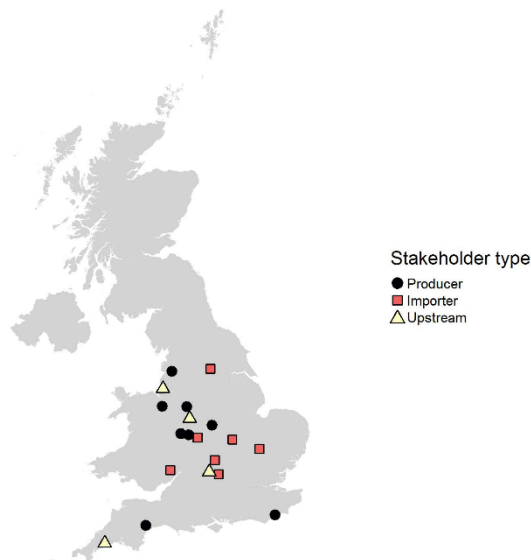
445. This section explores how impacts of the recommended measure are likely to be geographically distributed and whether any particular groups might be disproportionately impacted.

Likely impact on particular areas

446. Stoke-on-Trent in the West Midlands is the home of the UK's ceramics industry. In addition, parts of Cornwall, Devon (both in the South West of England), Shropshire (in the West Midlands) and Sussex (in the South East of England) are where the ceramics industry (including its different parts of the supply chain) is concentrated in the UK. Figure 3 shows the distribution of businesses that form the supply chain for ceramic tiles in the UK.

Figure 3: Locations of UK businesses that are part of UK supply chain for ceramic tiles.

Locations of UK businesses that are part of UK Ceramic Tiles supply chain.



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Notes: This map shows location of all known UK producers of ceramic tiles, sampled UK importers of ceramic tiles and sampled upstream businesses. This map does not show location of downstream businesses, which are numerous and located in different parts of the UK.



447. Our analysis found that UK producers of ceramic tiles are currently located in the following Travel to Work Areas (TTWAs) of the UK: Stoke-on-Trent, Dudley, Exeter, Hastings, Leicester, Preston, Telford and Wrexham.
448. UK importers of ceramic tiles are numerous and are located in different parts of the UK. Our map only shows sampled most frequent UK importers of ceramic tiles.
449. Upstream businesses are also located in different parts of the UK, although we believe that often these businesses are likely to be in geographic proximity to UK producers of ceramic tiles. Sampled upstream businesses that we show on our map include these businesses that supply different types of raw materials and inputs.
450. To assess the likely geographic impact in our analysis we first considered the importance of the supply chain for ceramic tiles to individual local areas of the UK. To do this, we calculated what proportion of the local area's working-age population was employed in the supply chain for ceramic tiles. Where this proportion was more than 1% we concluded that supply chain for ceramic tiles is an important part of the local labour market.
451. For areas of the UK where the supply chain for ceramic tiles employed more than 1% of the local area's working-age population, we then considered socio-economic data to assess if the measure (if varied as recommended or if revoked) could have any disproportionately negative impacts on these areas (for example, because these areas were economically vulnerable).
452. The stakeholders included in our analysis are limited to those identified during this review and therefore may not represent the complete ceramic tiles industry and related industries within the UK.
453. Although ceramics industry is important to Stoke-on-Trent, we found that the manufacturing of ceramic tiles is not important as a source of employment in Stoke-on-Trent.⁴⁰ Employment in the wider supply chain for ceramic tiles, which includes all upstream suppliers and downstream buyers, accounts for a larger

⁴⁰ In our analysis, we used employment by industry data from the Business Register and Employment Survey (BRES) and working-age population data from the Annual Population Survey (APS), both datasets from the Office for National Statistics (ONS). We found that employment in manufacturing of ceramic tiles accounted for 0.18% of the working-age population in Stoke-on-Trent. We defined 'manufacturing of ceramic tiles' as consisting of the following 4-digit classes of the UK SIC 2007: '23.31 Manufacture of ceramic tiles and flags' and '23.32 Manufacture of bricks, tiles and construction products, in baked clay'.



proportion of the working-age population in Stoke-on-Trent but we have no access to detailed employment data.

454. We found that employment in the supply chain for ceramic tiles is only important (i.e. more than 1% of the working-age population) in St Austell and Newquay, where upstream supplier is located. Analysis of socio-economic data did not suggest that St Austell and Newquay is an economically vulnerable area of the UK. For this reason, we concluded that St Austell and Newquay is not likely to be disproportionately impacted if the measure were to be varied as recommended or revoked.

455. We concluded that any disproportionately negative impacts on any geographic areas of the UK are not likely.

Likely impact on particular groups

456. We considered the likely impact on particular groups including those with protected characteristics as defined by the Equality Act 2010.

457. No party provided any evidence with respect to potential impacts on any particular groups, either as workers or consumers.

458. Therefore, there are no obvious impacts on groups with protected characteristics or other groups, which might result from varying the measure as recommended or revoking the measure.

H7 Likely consequences for the competitive environment and for the structure of markets for goods in the UK

459. The assessment of likely consequences for the competitive environment and structure of the UK market considers four areas:

- The impact on the number or range of suppliers;
- The impact on the ability of suppliers to compete;
- The impact on incentives to compete vigorously; and
- The impact on the choices and information available to consumers.

460. The UK market for ceramic tiles is fragmented: it consists of a small number of UK producers and a large number of importing businesses. We have obtained limited evidence, which we were not able to verify, on what market share were held by UK producers and UK importers.



461. We estimated that there were more than 2,000 importing businesses, which recently recorded import transactions involving ceramic tiles. We have no evidence to know how many of these businesses import ceramic tiles from the PRC, but we believe that this could be a relatively small proportion. This is because during the POI UK imports of ceramic tiles from PRC accounted for only 1% of total UK imports of ceramic tiles.

Impact on the number and range of suppliers

462. If the measure were varied as recommended, the number and range of suppliers of ceramic tiles in the UK market could increase for suppliers of large ceramic format tile and ceramic panels (save for where the differential relief on those products exceeds 3mm) from the PRC and is likely to remain unchanged for other suppliers.

463. If the measure were to be revoked, there could be reorientation of UK consumption of ceramic tiles away from domestic supply and towards foreign supply from the PRC, as well as reorientation of UK imports away from third countries and towards the PRC.

464. This possible reorientation of UK consumption of ceramic tiles is likely to have an impact on the number and range of suppliers. Firstly, there could be some new entrants to the UK market: in particular, new importing businesses that import from the PRC. Secondly, existing importing businesses that currently import from third countries could import from the PRC. Thirdly, some UK producers could exit the UK market.

465. We assess that it is not likely that the overall number of suppliers of ceramic tiles in the UK market would change dramatically, with or without the measure. We also assess that it is not likely that the range of suppliers would change dramatically, with or without the measure, although there could be a distinction between short-term, medium-term and long-term impacts.

Impact on the ability of suppliers to compete

466. If the measure were to be varied as recommended, the ability of suppliers of large ceramic format tile and ceramic panels (save for where the differential relief on those products exceeds 3mm) from the PRC to compete could increase, and is not likely to change for other suppliers.



467. If the measure were to be revoked, there is likelihood that dumping of ceramic tiles from the PRC and injury to the UK industry would recur. This would put UK producers and UK importers from third countries at a disadvantage as it would reduce their ability to compete relative to PRC exporters and UK importers from the PRC.

Impact on incentives to compete vigorously

468. We do not foresee that it is likely that incentives to compete vigorously on the part of UK producers as well as UK importers will be in any way affected if the measure were to be varied as recommended or revoked.

Impact on the choices and information available to consumers

469. If the measure were varied as recommended, the choices that are currently available to consumers are unlikely to change with the exception of large ceramic format tile and ceramic panels (save for where the differential relief on those products exceeds 3mm) from the PRC. The choices of large ceramic format tile and ceramic panels (save for where the differential relief on those products exceeds 3mm) from the PRC on the UK market are likely to increase.

470. If the measure were to be revoked, consumers would be likely to have a wider range of ceramic tiles from the PRC available to them, which are currently imported into the UK in small quantities.

471. We do not consider it likely that there would be any impact on information available to consumers, neither if the measure were to be varied as recommended nor if the measure were revoked.

H8 Such other matters as the TRA considers relevant

472. As part of the EIT, we consider any other factors additional to those set out in the legislation, which could have implications in concluding whether the recommended trade remedy measure is in the economic interest of the UK.

473. We found no evidence of any other relevant factors for this anti-dumping transition review and no evidence was submitted to us by interested parties.



H9 Forms of measure

474. In the EIT we consider the most appropriate form of measure to recommend, in particular, whether any changes to the length or coverage of the measure would minimise the negative impacts of the measure on some parties while retaining the overall benefits.
475. The measure applicable to the imports of ceramic tiles from the PRC is the *ad valorem* duty that ranges from 13.9% to 69.7%.⁴¹
476. We have neither received nor found evidence suggesting that a change to the form of the measure would benefit the UK economy.

H10 Conclusion on Economic Interest Test

477. In accordance with paragraph 25 of the Schedule 4 to the Act, we consider whether the application of a remedy would be in the economic interest of the UK. The Economic Interest Test is presumed to be met unless we are satisfied that the application of the remedy is not in the economic interest of the UK.
478. Following the dumping and injury likelihood assessments, in sections F and G respectively, we have considered whether maintaining the existing measure would be in the economic interest of the UK.
479. In [the section setting out factors in relation to injury](#), we concluded that the revocation of the measure applicable to ceramic tiles imported from the PRC is likely to lead to a recurrence of injury to UK industry because of increased competition from lower-priced imports of ceramic tiles from the PRC.
480. In [the section regarding economic significance](#), we found that ceramic tiles are a very important product for UK producers and UK importers, as well as a somewhat important product for upstream businesses that supply raw materials and inputs to UK producers of ceramic tiles. We also found that ceramic tiles are not an important product for downstream businesses but we also recognised that downstream businesses are a diverse group.
481. In [the impacts on affected industries and consumers section](#), we concluded that if the measure were varied as recommended any disproportionately negative

⁴¹ These *ad valorem* duty rates are detailed in Annex 1.



impact on any affected industries and consumers are not likely. We, however, acknowledged that if the measure were to be varied as recommended rather than revoked, then importers, downstream businesses and consumers would not benefit from access to lower-priced ceramic tiles from the PRC, unless they were buying and using large ceramic format tile and ceramic panels (save for where the differential relief on those products exceeds 3mm). These affected industries and consumers could still access lower-priced alternatives and substitute products.

482. In [the section assessing the likely impacts on particular geographic areas and particular groups](#), we concluded that the measure is not likely to cause any disproportionately negative impacts on any particular geographic areas of the UK or any particular groups. We found that the supply chain for ceramic tiles is important as a source of employment in St Austell and Newquay.
483. In [the section on competition](#), we found that the market for ceramic tiles in the UK is fragmented and competitive. We concluded that the measure is not likely to cause any disproportionately negative impact on the competitive environment or the structure of the market in the UK.
484. We found no evidence of any [other relevant factors](#) for this anti-dumping transition review and no evidence was submitted to us by interested parties.
485. We have identified the following key positive impacts of varying the measure as recommended:
- The UK industry would benefit because the measure would prevent recurrence of injury to UK industry.
 - The measure would help to support the operation of the wider supply chain for ceramic tiles in the UK.
486. The contrasting key negative impacts are:
- With the exception of large ceramic format tile and ceramic panels (save for where the differential relief on those products exceeds 3mm), average prices of ceramic tiles from the PRC are likely to be higher than they are likely to be if the measure were to be revoked.
 - Importers, downstream industries (including wholesale and retail suppliers) and consumers (including homeowners, and tile fixers and installers) would not benefit from the ability to buy lower-priced ceramic tiles from the PRC, unless buying large ceramic format tile



and ceramic panels (save for where the differential relief on those products exceeds 3mm).

487. Based on our consideration of the evidence submitted by interested parties and all the factors listed in the legislation, we conclude that varying the measure as recommended is unlikely to cause any disproportionate negative effects to the UK economy and, therefore, that the EIT is met for the application of the recommended measure.



SECTION I: Findings and recommendations

I.1 Findings

488. The TRA has found that:

- it is likely that the dumping of ceramic tiles would recur if the anti-dumping amount were no longer applied to the goods subject to review, and;
- it is likely that injury to the UK industry would recur if the anti-dumping amount were no longer applied to ceramic tiles which, individually:
 - have a surface area equal to or less than 0.36m^2 , and;
 - have no edge longer than 600mm, or;
 - have a differential relief on the largest surface greater than 3mm, and;
- it is not likely that injury would recur for UK producers of ceramic tiles if the anti-dumping amount were no longer applied to ceramic tiles which, individually:
 - have a largest surface area exceeding 0.36m^2 unless the differential relief on the largest surface exceeds 3mm, or;
 - have an edge longer than 600mm unless the differential relief on the largest surface exceeds 3mm.
- it is in the economic interest of the UK for the measure to be varied as recommended.

I.2 Final recommendation

489. In accordance with regulation 100(1) of the Regulations, the TRA must make a recommendation to the Secretary of State, following a transition review, to vary or revoke the application of the anti-dumping amount to the goods subject to review.

490. We recommend variation of the application of the anti-dumping amount under regulations 100(2)(a)(i) and 100A of the Regulations, so that it applies to the goods subject to review imported from the PRC into the UK that:

- have a largest surface area equal to or less than 0.36m^2 , and;
- have no edge longer than 600mm, or;
- have a differential relief on the largest surface greater than 3mm.



491. We recommend these apply until 24 November 2027 – that is five years subsequent to the date when the measure would have otherwise expired (24 November 2022) had no transition review been initiated.⁴²
492. We also recommend partial revocation of the measure pursuant to regulations 100(2)(a)(ii) and 100B of the Regulations, on larger formats of tiles, specifically tiles which, individually:
- have a largest surface area exceeding 0.36m² unless the differential relief on the largest surface exceeds 3mm, or;
 - have an edge longer than 600mm unless the differential relief on the largest surface exceeds 3mm.
493. We recommend as the appropriate date for the partial revocation, the date of expiry of the UK measure, that is, as from 24 November 2022, pursuant to regulations 100(2)(a)(ii), 100B(2) and 94(1)(b)(ii) of the Regulations.
494. In the absence of suitable data to recalculate the anti-dumping amount, we recommend pursuant to regulation 100A(4)(b) of the Regulations that the rates of duty remain unchanged from those set out in Taxation Notice 2020/18. The rates we recommend are therefore those current rates detailed in Annex 1.
495. In addition, the TRA recommends that ‘finishing ceramics’ be added to, and ‘glazed and unglazed’ be removed from the description of the goods subject to review, so that the measure reflects the description of the goods contained within commodity code 6907 of the UK Trade Tariff and the corresponding WCO HS code.
496. The description of the goods subject to the measure would now read:
- “Ceramic flags and paving, hearth or wall tiles; ceramic mosaic cubes and the like, whether or not on a backing; finishing ceramics
- except tiles which, individually:
- have a largest surface area exceeding 0.36m² unless the differential relief on the largest surface exceeds 3mm.

⁴²As detailed in [Taxation Notice 2020/18](#). See also [regulation 97C of the Regulations](#).



Trade Remedies
Authority

- have an edge longer than 600mm unless the differential relief on the largest surface exceeds 3mm.”

497. In reaching this Final Recommendation we considered the current and prospective impact of the anti-dumping amount (see regulation 100A(2)(b) of the Regulations).



Annex 1: Applicable rates of duty⁴³

Overseas Exporter	Anti-dumping duty rate (<i>ad valorem</i>)	Definitive anti-dumping duty additional code ⁴⁴
Dongguan City Wonderful Ceramics Industrial Park Co., Ltd	32.0%	B938
Foshan Gani Ceramics Co. Ltd	13.9%	B939
Guangdong Jiamei Ceramics Co., Ltd	32.0%	B938
Guangdong Xinruncheng Ceramics Co. Ltd	29.3%	B009
Qingyuan Gani Ceramics Co. Ltd	13.9%	B939
Shandong Yadi Ceramics Co Ltd	36.5%	B010
Dongguan He Mei Ceramics Co. Ltd	30.6%	B132
Dongpeng Ceramic (Qingyuan) Co. Ltd	30.6%	B133
Eagle Brand Ceramics Industrial (Heyuan) Co. Ltd	30.6%	B134
Enping City Huachang Ceramic Co. Ltd	30.6%	B135
Enping Huiying Ceramics Industry Co. Ltd	30.6%	B136
Enping Yungo Ceramic Co. Ltd	30.6%	B137
Everstone Industry (Qingdao) Co., Ltd	30.6%	B998
Foshan Aoling Jinggong Ceramics Co. Ltd	30.6%	B138
Foshan Bailifeng Building Materials Co. Ltd	30.6%	B139
Foshan Braji Ceramic Co. Ltd	30.6%	B140
Foshan City Fangyuan Ceramic Co. Ltd	30.6%	B141
Foshan Gaoming Shuncheng Ceramic Co. Ltd	30.6%	B142
Foshan Gaoming Yaju Ceramics Co. Ltd	30.6%	B143
Foshan Guanzhu Ceramics Co. Ltd	30.6%	B144
Foshan Huashengchang Ceramic Co. Ltd	30.6%	B145
Foshan Jiajun Ceramics Co. Ltd	30.6%	B146
Foshan Mingzhao Technology Development Co. Ltd	30.6%	B147
Foshan Nanhai Jingye Ceramics Co. Ltd	30.6%	B148
Foshan Nanhai Shengdige Decoration Material Co. Ltd	30.6%	B149
Foshan Nanhai Xiaotang Jinzun Border Factory Co. Ltd	30.6%	B150
Foshan Nanhai Yonghong Ceramic Co. Ltd	30.6%	B151

⁴³ As we have been unable to recalculate dumping margins and injury margins in this transition review, these duty rates reflect the definitive anti-dumping duty rates applied by [EU Commission Implementing Regulation \(EU\) 2017/2179 of 22 Nov 2017](#), the current UK duty rates for goods subject to review as detailed in the [Taxation Notice](#), and the rates we recommended as a result of this review.

⁴⁴ From 1 January 2021, the UK initiated a new tariff regime entitled the UK Global Tariff (UKGT) to replace EU TARIC codes. The codes listed relate to the transitioned measure.



Trade Remedies
Authority

Foshan Oceanland Ceramics Co. Ltd	30.6%	B152
Foshan Oceano Ceramics Co. Ltd	30.6%	B153
Foshan Sanshui Hongyuan Ceramics Enterprise Co. Ltd	30.6%	B154
Foshan Sanshui Huiwanjia Ceramics Co. Ltd	30.6%	B155
Foshan Sanshui New Pearl Construction Ceramics Industrial Co. Ltd	30.6%	B156
Foshan Shiwan Eagle Brand Ceramic Co. Ltd	30.6%	B157
Foshan Shiwan Yulong Ceramics Co. Ltd	30.6%	B158
Foshan Summit Ceramics Co. Ltd	30.6%	B159
Foshan Tidy Ceramics Co. Ltd	30.6%	B160
Foshan VIGORBOOM Ceramic Co. Ltd	30.6%	B161
Foshan Xingtai Ceramics Co. Ltd	30.6%	B162
Foshan Zhuyangyang Ceramics Co. Ltd	30.6%	B163
Fujian Fuzhou Zhongxin Ceramics Co. Ltd	30.6%	B164
Fujian Jinjiang Lianxing Building Material Co. Ltd	30.6%	B165
Fujian Mingqing Jiali Ceramics Co. Ltd	30.6%	B166
Fujian Mingqing Ruimei Ceramics Co. Ltd	30.6%	B167
Fujian Mingqing Shuangxing Ceramics Co. Ltd	30.6%	B168
Gaoyao Yushan Ceramics Industry Co. Ltd	30.6%	B169
Guangdong Bode Fine Building Materials Co. Ltd	30.6%	B170
Guangdong Foshan Redpearl Building Material Co. Ltd	30.6%	B171
Guangdong Gold Medal Ceramics Co. Ltd	30.6%	B172
Guangdong Grifine Ceramics Co. Ltd	30.6%	B173
Guangdong Homeway Ceramics Industry Co. Ltd	30.6%	B174
Guangdong Huiya Ceramics Co. Ltd	30.6%	B175
Guangdong Juimsi Ceramics Co. Ltd	30.6%	B176
Guangdong Kaiping Tilee's Building Materials Co. Ltd	30.6%	B177
Guangdong Kingdom Ceramics Co. Ltd	30.6%	B178
Guangdong Luxury Micro-crystal stone Technology Co., Ltd	30.6%	B195
Guangdong New Zhong Yuan Ceramics Co. Ltd (Shunde Yuezhong Branch)	30.6%	B180
Guangdong Ouya Ceramics Co. Ltd	30.6%	B181
Guangdong Overland Ceramics Co. Ltd	30.6%	B182
Guangdong Qianhui (QHTC) Ceramics Co. Ltd	30.6%	B183
Guangdong Sihui Kedi Ceramics Co. Ltd	30.6%	B184
Guangdong Summit Ceramics Co. Ltd	30.6%	B185
Guangdong Tianbi Ceramics Co. Ltd	30.6%	B186
Guangdong Winto Ceramics Co. Ltd	30.6%	B187
Guangdong Xinghui Ceramics Group Co. Ltd	30.6%	B188
Guangning County Oudian Art Ceramic Co. Ltd	30.6%	B189
Guangzhou Cowin Ceramics Co. Ltd	30.6%	B190



Trade Remedies
Authority

Hangzhou Nabel Ceramics Co. Ltd	30.6%	B191
Hangzhou Nabel Group Co. Ltd	30.6%	B192
Hangzhou Venice Ceramics Co. Ltd	30.6%	B193
Heyuan Becarry Ceramics Co. Ltd	30.6%	B194
Hitom Ceramics Co. Ltd	30.6%	B196
Huiyang Kingtile Ceramics Co. Ltd	30.6%	B197
Jiangxi Ouya Ceramics Co. Ltd	30.6%	B198
Jingdezhen Tidiy Ceramics Co. Ltd	30.6%	B199
Kim Hin Ceramics (Shanghai) Co. Ltd	30.6%	B200
Lixian Xinpeng Ceramic Co. Ltd	30.6%	B201
Louis Valentino (Inner Mongolia) Ceramic Co. Ltd	30.6%	B202
Louvrenike (Foshan) Ceramics Co. Ltd	30.6%	B203
Mona Lisa Group Ltd. (formerly Tianjin (TEDA) Honghui Industry & Trade Co. Ltd	30.6%	B221
Nabel Ceramics (Jiujiang City) Co. Ltd	30.6%	B204
Onna Ceramic Industries (China) Co., Ltd	30.6%	B293
Ordos Xinghui Ceramics Co. Ltd	30.6%	B205
Qingdao Diya Ceramics Co. Ltd	30.6%	B206
Qingyuan Guanxingwang Ceramics Co. Ltd	30.6%	B207
Qingyuan Oudian Art Ceramic Co. Ltd	30.6%	B208
Qingyuan Ouya Ceramics Co. Ltd	30.6%	B209
RAK (Gaoyao) Ceramics Co. Ltd	30.6%	B210
Shandong ASA Ceramic Co. Ltd	30.6%	B211
Shandong Dongpeng Ceramic Co. Ltd	30.6%	B212
Shandong Jialiya Ceramic Co. Ltd	30.6%	B213
Shandong Tongyi Ceramics Co. Ltd	30.6%	B229
Shanghai CIMIC Holdings Co., Ltd	30.6%	B214
Sinyih Ceramic (China) Co. Ltd	30.6%	B215
Sinyih Ceramic (Penglai) Co. Ltd	30.6%	B216
Southern Building Materials and Sanitary Co. Ltd of Qingyuan	30.6%	B217
Tangshan Huida Ceramic Group Co. Ltd	30.6%	B218
Tangshan Huida Ceramic Group Huiquin Co. Ltd	30.6%	B219
Tegaote Ceramics Co. Ltd	30.6%	B220
Tianjin Honghui Creative Technology Co. Ltd (formerly Guangdong Monalisa Ceramics Co. Ltd.)	30.6%	B179
Topbro Ceramics Co. Ltd	30.6%	B222
Xingning Christ Craftworks Co. Ltd	30.6%	B223
Zhao Qing City Shenghui Ceramics Co. Ltd	30.6%	B224
Zhaoqing Jin Ouya Ceramics Company Limited	30.6%	B225
Zhaoqing Zhongheng Ceramics Co. Ltd	30.6%	B226
Zhuhai Xuri Ceramics Co., Ltd	30.6%	C505



Trade Remedies
Authority

Zibo Hualiansheng Ceramics Co. Ltd	30.6%	B227
Zibo Huaruino Ceramics Co. Ltd	30.6%	B228
All other overseas exporters (residual amount)	69.7%	B999



Annex 2: Information from participants in the review

UK industry

Party	Submission(s)
Johnson Tiles	Statement of reasons
Shackerley	Questionnaire response

PRC industry

Party	Submission(s)
Overland	Questionnaire response
	Additional submission
	Response to SEF

Foreign governments

Party	Submission(s)
MOFCOM	Comment on PMS

Trade bodies

Party	Submission(s)
BCC	Questionnaire response
	Submission
	Response to SEF
	Email regarding scope
CCCMC	Questionnaire response
	Response to Note to File
	Response to two recent notes
	Response to SEF



Contributors

Party	Submission(s)
Original Style	Note to File
	Letter
Matclad	Note to File
Craven Dunnill	Note to File
Ibstock	Note to File
Ketley	Note to File
Forterra	Note to File
Distribution Supplies	Statement