



Pre-Sampling Questionnaire (Importer)
Transition review of anti-dumping measures
**Case TD0056: Certain Ceramic Tableware and
Kitchenware products originating in the People's Republic
of China**

Period of Investigation:	<input type="text" value="01 April 2023 – 31 March 2024"/>
Injury Period:	<input type="text" value="01 April 2020 – 31 March 2024"/>
Deadline for response:	<input type="text" value="30 May 2024"/>
Case Team Contact:	<input type="text" value="TD0056@traderemedies.gov.uk"/>
Completed on behalf of:	<input type="text" value="Inter Table Top Company"/>

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

Confidential
 Non-confidential – will be made publicly available

Please note that you will have to provide **two copies of your response** – a **confidential** and a **non-confidential version**. Both copies must be returned to the TRA using the Trade Remedies Service (www.trade-remedies.service.gov.uk) by **30 May 2024**.



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Instructions

The Trade Remedies Authority (TRA) will be carrying out a transition review of the EU trade remedy measure which will consider whether the dumping of certain ceramic tableware and kitchenware products from the People's Republic of China (PRC) would be likely to continue or recur if the anti-dumping duty were no longer applied to those goods, and injury to the UK industry in the **like goods** would be likely to continue or recur if the anti-dumping duty were no longer applied to those goods.

Who should complete this form?

You should complete this form if you are a **UK importer** of the [goods subject to review](#) (as defined on page 4) in this transition review.

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

We are seeking your cooperation as a **UK importer** of the **goods subject to review** to inform our review of the existing anti-dumping measures against Ceramic Tableware and Kitchenware (CT&K) originating in the PRC, and whether to vary (including extending the application of) or revoke the current measures.

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

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

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

Also, if you do not complete this pre-sampling questionnaire or the detailed questionnaire (if requested to complete), you could be found to be non-cooperative. For more details on how this may affect you, please consult our [operational guidance on non-cooperation](#).

Note about confidentiality



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

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

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

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

The non-confidential version of your submission will be placed on the public file, which is available on

<https://www.trade-remedies.service.gov.uk/public/case/TD0056/>.

Deadline for response

A completed PSQ (confidential and non-confidential versions) must be submitted to the TRA no later than **30 May 2024**.

If you are unable to provide a completed submission by this date and you wish to request an extension, please contact TD0056@traderemedies.gov.uk. We may grant extensions to deadlines on a case-by-case basis with a commitment to ensuring fairness to all parties. Extensions will only be granted when reasonable justification has been provided, and for a maximum period of half the original completion period (*i.e.*, five days extension in a 10-day registration period).

The scope of this transition review

Goods subject to review

This transition review covers certain ceramic tableware and kitchenware products exported from the PRC, described as:

Ceramic tableware and kitchenware, excluding ceramic condiment or spice mills and their ceramic grinding parts, ceramic coffee mills, ceramic knife sharpeners, ceramic sharpeners, ceramic kitchen tools to be used for cutting, grinding, grating, slicing, scraping and peeling, and cordierite ceramic pizza-stones of a kind used for baking pizza or bread.

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

69 11 10 00 90	69 12 00 21 91	69 12 00 25 10
69 12 00 21 11	69 12 00 23 10	69 12 00 29 10



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

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

To note: if you disagree with the description of the goods subject to review within the scope of this transition review, you can comment on this in section [D2 – Scope](#).

Like goods

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

Recalculation in transition reviews

Please note that the TRA does not intend to assess whether it is necessary to recalculate the anti-dumping amounts in this transition review unless registered parties to the case provide compelling evidence that it may be appropriate to recalculate. If this is the case, please provide the information as part of this submission in section [D6 – Anything else](#).

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

For more information, you may refer to the Notice of Initiation published at: <https://www.trade-remedies.service.gov.uk/public/case/TD0056/>.



Section A – Activities of your company and any associated parties

A1 – Your company’s activities

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

importer of the **goods subject to review** in the UK

other (please give details below)

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

A2 – Associated parties and operational links

Please give details of all associated parties involved with your company in the production and sales (export and/or domestic) of the **goods subject to review** or **like goods** during the Period of Investigation (POI). The POI can be found on the title page of this document. Both natural persons (individuals) and legal persons (*e.g.* companies) are considered to be associated where they meet the definition of ‘Related Persons’ in [regulation 128 of the Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#).

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

	Company name	Company location (city, country)	Activities	Relationship (<i>i.e.</i> , associated supplier, associated sales)
Associated party 1				
Associated party 2				

+ Add additional rows as required

A3 – Your position in respect of this measure



Please describe whether you think the anti-dumping measures should be varied (including extended) or revoked and why?

Please see Annex 2

Section B – Details of companies you import from

Please provide the contact details for each individual company from which you import. Please confirm in the final column if we can contact these companies.

Exporter/supplier name	Address	Contact details	May we contact? yes/no

+ Add additional rows as required

Section C – Sales, imports and domestic purchases

C1 – Total company revenue

Please provide your company’s total revenue and the revenue of the **goods subject to review**:

	Value in GBP (£)
Total revenue of your company during the POI	2 900 000 - 3 700 000
Total revenue of your company for the goods subject to review during the POI	90 000 – 150 000

C2 – Your imports of the goods subject to review



Please provide the total volume and value of the **goods subject to review imported** by your company from **the People’s Republic of China** during the POI:

	Volume*		Value in GBP (£)
	kg	units	
The goods subject to review imported into the UK during the POI <i>(Sum of next three rows should match volume/value of this row)</i>		<u>15000 - 20000</u>	85000 - 110000
The goods subject to review imported into the UK during the POI and resold in the UK		<u>6700 - 8500</u>	<u>36000 - 42000</u>
The goods subject to review imported into the UK during the POI and consumed by your own company			
The goods subject to review imported into the UK during the POI and exported			

* Note: volume by mass preferably, else by number of units

Please provide the total volume and value of the **like goods imported** by your company from **all other countries** during the POI:

	Volume*		Value in GBP (£)
	kg	Units	
The like goods imported into the UK during the POI <i>(Sum of next three rows should match volume/value of this row)</i>			
The like goods imported into the UK during the POI and resold in the UK			
The like goods imported into the UK during the POI and consumed by your own company			
The like goods imported into the UK during the POI and exported			

* Note: volume by mass preferably, else by number of units



C3 – Like goods purchased from a UK producer

If you have also **purchased like goods** from a **UK producer** during the POI, please provide the total sales volume and total sales price value of your purchases in the table below.

	Volume*		Value In GBP (£)
	kg	units	
Like goods purchased from UK producers during the POI <i>(Sum of next three rows should match volume/value of this row)</i>			
Like goods purchased from UK producers during the POI and resold in the UK market			
Like goods purchased from UK producers during the POI and consumed by your own company			
Like goods purchased from UK producers during the POI and exported			

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

Please can you confirm whether you will be able to provide this information to the level of detail required?

- Yes
- No



Section D – Additional information

D1 – Market prices in the PRC domestic and export market, and price comparison to the UK market

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

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

Please see Annex 3

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

N/A

D2 – Scope

Please see Annex 4



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

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

Differentiation should be made between to include high-quality ceramic tableware and kitchenware that meet international standards and excluding low-quality products and non-tableware ceramics. This approach ensures that only premium products compete in the market and protecting local industries.

D3 – Product Control Numbers

The TRA uses product control numbers (PCNs) to define and distinguish the different types of products that fall under the goods description above.

PCNs, which come in the form of an **alphanumeric code**, help to create a categorisation system so that comparisons can be made between goods produced in the domestic UK market and those produced in foreign markets.

We have created a draft PCN table which is set out in [Annex 1](#) at the end of this document.

Please review the draft PCN structure for this investigation and include any comments on the PCN structure in the box provided below:

See annexure 5

D4 – Other interested parties

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

Organisation name	Website



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D5 – Economic Interest Test

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

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

We would like to use any contact details you provide to get in touch with these companies, although there is no obligation on you to provide this information.

	Company name	Location (city, country)	Contact information (email/telephone)	Relationship
1				
2				
3				

D6 – Anything else

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

Now you have reached the end of this questionnaire please ensure that you have prepared a

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



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



Annex 1 – PCN table

DESCRIPTION	Explanation			Code	
Material of tableware & kitchenware (by CN code)	Tableware and kitchenware of PORCELAIN or CHINA	Water Absorption water absorption ≤ 0.5%	Visible Texture Homogeneous	CN Code CN 69 11 10 00	1
	Tableware and kitchenware of OTHER than PORCELAIN or CHINA:				
	Of Stoneware	water absorption > 0.5% and < 3 %	Homogeneous	CN 69 12 00 30	2
	Of common pottery	water absorption > 3 %	Heterogeneities > 0,15 mm	CN 69 12 00 10	3
	Of Earthenware or fine pottery	water absorption > 3 %	Heterogeneities ≤ 0,15 mm	CN 69 12 00 50	4
	Made of other (specify)	products neither falling under above mentioned nor under porcelain		CN 69 12 00 90	5
Type of ware	Tableware				T
	Kitchenware				K
shape	tableware	plates (plates, dishes, saucers)	round		A
	tableware	bowls	round		B
	tableware	serving plate / tray	round		C
	tableware	plates (plates, dishes, saucers)	square, oval, rectangular, other shape		D
	tableware	bowls	square, oval, rectangular, other shape		E
	tableware	serving plate / tray	square, oval, rectangular, other shape		F
	tableware	cups			G
	tableware	coffee pot, tea pot			H
	tableware	soup tureens (with and without cover)			I
	tableware	beer mugs			J
	tableware	pots for mustard, sugar, salt etc (with and without cover)			K
	tableware	accessories (salt/pepper caster/shaker, egg-cups, teapot stands, knife rests, serviette rings)			L
	tableware	Other (not mentioned above, please explain)			M
	kitchenware	stew pans, basins, casseroles of all shapes and sizes			N
	kitchenware	baking or roasting dishes			O
	kitchenware	butter dish with and without cover			P
kitchenware	pastry or jelly moulds, kitchen jugs, storage jars and bins (tea caddies, bread bins), funnels, ladles, rolling pins			Q	
kitchenware	Other (not mentioned above, please explain)			R	
Size -details of certain shape and details of sets		<u>round</u>	<u>square, oval, rectangular, other shape</u>		
	Plates (plates, dishes, saucers)	diameter below 18cm	largest width below 180 mm		A01A
	Plates (plates, dishes, saucers)	diameter 180 - 230 mm	largest width >180 mm - 230 mm		A01B
	Plates (plates, dishes, saucers)	diameter > 230 mm and ≤ 290 mm	largest width > 230 mm and ≤ 290 mm		A01C
	Plates (plates, dishes, saucers)	diameter > 290 mm	largest width > 290 mm		A01D
	Bowls	diameter below 18cm	largest width below 180 mm		B01A
	Bowls	diameter 180 - 230 mm	largest width >180 mm - 230 mm		B01B
	Bowls	diameter > 230 mm and ≤ 290 mm	largest width > 230 mm and ≤ 290 mm		B01C
	Bowls	diameter > 290 mm	largest width > 290 mm		B01D
	Cups	* details see footnote	maximal content ≤ 0.1 litre		C01A
	Cups	* details see footnote	maximal content > 0.1 and ≤ 0.25 litre		C01B
	Cups	* details see footnote	maximal content above 0.25 litre		C01C
	Serving ware	serving plate(tray)			D01X
	Hollows	Teapot, Coffeepot etc	maximal content up to 1 litre		E01A
	Hollows	Teapot, Coffeepot etc	maximal content above 1 litre		E01B
	Coffee - tea set 2 pieces	cup with content of < 0.1 l and saucer diameter < 150 mm			F02A
	Coffee - tea set 2 pieces	cup with content of < 0.25 l and saucer diameter < 150 mm			F02B
	Coffee - tea set 3 pieces	small bowl, cup, saucer			F03X
	Coffee - tea - Sets 12 pieces	6 cups + 6 saucers			F12X
	Coffee - tea - Sets 15 pieces	4 cups, 4 saucers, 4 dessert plates, coffee or tea pot; creamer, sugar bowl			F15A
	Coffee - tea - Sets 15 pieces	6 cups, 6 saucers, 1 coffee or tea pot, creamer, sugar bowl			F15B
	Coffee - tea - Sets 20 pieces	6 cups, 6 saucers, 6 dessert plates, coffee or tea pot; sugar bowl			F20X
	Coffee - tea - Sets 21 pieces	6 cups, 6 saucers, 6 dessert plates, coffee or tea pot; creamer, sugar bowl			F21X
	Coffee - tea - sets	other than above combination (please give number of pieces)			FooX**
	Dinner - Sets 12 pieces	4 dinner plates, 4 soup plates (or bowls), 4 dessert plates			G12X
	Dinner - Sets 16 pieces	6 dinner plates, 6 soup plates (or bowls), 2 salad plates, saucer, oval plate			G16X
	Dinner - Sets 18 pieces	6 dinner plates, 6 soup plates (or bowls), 6 dessert plates			G18X
	Dinner - Sets 20 pieces	4 dinner plates, 4 soup plates (or bowls), 4 dessert plates, 4 cups, 4 saucers			G20X
	Dinner - Sets 24 pieces & 'Combi'	24 pieces can be offered with 4 or 6 pieces combined with coffee sets as combi products			G24X
	Dinner - Sets 30 pieces	6 dinner plates, 6 soup plates (or bowls), 6 dessert plates, 6 cups, 6 saucers			G30X
	Dinner - Sets	other than above combination (please give number of pieces)			GooX**
	All other tableware	all tableware and accessories not mentioned above			AAAA
Kitchenware	all types of kitchenware			KKKK	
Type of Glaze (coating)	coloured			C	
	neutral glaze			N	
Finishing / Decoration	Decorated	with precious metals (gold, silver, etc)		H	
	Decorated	without precious metals		D	
	Undecorated			U	
	* Cups are coffee and/or tea cups; with and without handle				
	** 'oo' gives number of pieces				



Some examples of products and their corresponding PCNs are below:

- 1) round salad bowl with top diameter 300mm, made of porcelain with water absorption <0.5%, neutral glazed, decorated without precious metals = **1TBB01DND**;
- 2) an earthenware round soup plate with diameter of 250mm, white (neutral glaze), undecorated = **4TAA01CNU**;
- 3) a square dinner plate with a width of 240mm, made of porcelain, in black, undecorated = **1TDA01CCU**;
- 4) a rectangular baking dish, made of stoneware with water absorption rate of 2%, white (neutral glazed), undecorated = **2KOKKKKNU**; and
- 5) a dinner set of 34 pieces made of earthenware, coloured, and decorated with precious metals = **4TMG34XCH**.



ANNEX 2

We believe that the current anti-dumping measures should be varied to differentiate between high-quality and low-quality ceramic products imported from not only China but other countries also and that Factories should be graded based on their quality of products produced. The following points outline why we advocate for a selective reduction or removal of anti-dumping duties on high-quality products while maintaining anti-dumping duties on low-quality products:

1. Quality Standards and Certifications:

1.1. High-quality ceramic products from China adhere to rigorous international standards, including ISO 9001, SGS, and BSCI certifications. These certifications ensure that the products meet high-quality benchmarks comparable to those produced in countries not subject to anti-dumping duties.

2. Unfair Competitive Advantage:

2.1. Factories in countries subject to low or no anti-dumping duties, have an unfair competitive advantage over high-quality factories from China. The high-quality factories from China's products are in most cases of a better or similar quality and complies to the same certification standards. This discrepancy undermines fair competition and restricts consumer choice in the UK market.

3. Cost of Production in the UK:

3.1. The cost of producing ceramic products in the UK has increased significantly due to several factors, making it challenging for UK manufacturers to manufacture locally. These factors include rising labour costs, increased raw material prices and higher energy costs. This has forced more local manufacturers that have also elected to import more and more internationally including from China.

3.2. Labor Costs:

The average wage for manufacturing workers in the UK has risen steadily. According to the Office for National Statistics (<https://www.ons.gov.uk>), labour costs have seen a year-on-year increase due to minimum wage hikes and inflation adjustments. This trend places additional financial strain on manufacturers covering higher wage bills.

3.3. Raw Material Costs:

The cost of raw materials, such as clay and other essential components for ceramic production, has increased globally. This is partly due to supply chain disruptions and increased demand.

3.4. Energy Costs:

Energy costs in the UK have increased, with electricity and gas prices reaching new highs. Manufacturing ceramics is energy-intensive, requiring significant amounts of heat for firing kilns.



4. Consumer Benefits

4.1. Reducing or removing duties on high-quality imports from China will lower prices for UK consumers and provide them with more options without compromising on quality. This approach aligns with consumer preferences for high-quality products that offer good value for money. By allowing access to premium products and factories from China without the additional cost burden of anti-dumping duties, consumers can enjoy better quality at more affordable prices. This not only increases consumer satisfaction but also promotes a more competitive market environment.

4.2. Economic Impact:

4.2.1. Increased Competition: Reducing duties on high-quality imports fosters competition among suppliers, encouraging local manufacturers to innovate and improve their products to maintain market share. This competitive environment benefits consumers by providing a wider range of high-quality options.

4.2.2. Cost Savings: Lowering or removing duties reduces the overall cost of imported high-quality goods. These savings can be passed on to consumers in the form of lower retail prices, making premium products more accessible to a broader audience. This will have a direct effect on the economy as consumers will now have more money available to spend on other goods.

4.2.3. Market Diversity: By allowing more high-quality products into the market, consumers benefit from increased diversity in product choices. This variety enables consumers to find products that best meet their specific needs and preferences, enhancing overall satisfaction.

5. Economic Interest and Market Dynamics

5.1. Supply Chain Benefits:

5.2. Raw Material Suppliers:

Reducing duties on high-quality ceramic imports will increase demand for raw materials sourced within the UK. This will provide a boost to local suppliers of clay, glazing materials, and other components, fostering growth and stability in these sectors.

5.3. Packaging Providers:

Enhanced competitiveness of high-quality imports will lead to increased production volumes, necessitating more packaging solutions. This growth will benefit UK packaging providers, driving innovation and creating new job opportunities.

5.4. Logistics and Distribution:

As demand for high-quality imports rises, the logistics and distribution sectors will also see increased activity. This includes warehousing, transportation, and supply chain management services, contributing to overall economic growth.



5.5. Local Manufacturers: By reducing duties on high-quality imports, local manufacturers are encouraged to innovate and improve their product offerings. This fosters a competitive environment where quality and efficiency are prioritized, benefiting consumers and enhancing the global competitiveness of UK products.

5.6. Positive Economic Contributions:

5.6.1. GDP Growth: Increased activity in the manufacturing, packaging, and logistics sectors will contribute positively to the UK's GDP.

5.6.2. Employment: The growth in related industries will lead to job creation, reducing unemployment rates and providing more opportunities for skilled labour in the UK.

5.7. Research and Development:

A competitive market environment incentivises businesses to invest in research and development. This leads to innovation in production techniques, materials, and product designs.

5.8. Foreign Direct Investment:

A favourable market for high-quality imports can attract foreign direct investment, as global companies seek to capitalize on the UK's robust supply chain and market potential. This is further supported by economic models that show the positive correlation between trade liberalisation and FDI inflows.

6. Protecting Local Industry

6.1. Maintaining Anti-Dumping Duties on Low-Quality Products:

6.2. Protection from Unfair Competition:

By maintaining anti-dumping duties on low-quality ceramic products not only from China but from other countries also, the UK can effectively shield its local manufacturers from unfair competition. These duties prevent the influx of inferior products that are sold at prices below fair market value, which would otherwise undermine local industries.

6.3. Preserving Quality and Reputation:

Ensuring that only high-quality products can compete in the UK market helps preserve the reputation of UK-made goods. This measure supports local manufacturers who maintain high standards, thereby fostering consumer trust and loyalty towards UK products.

6.4. Supporting Local Employment:

6.4.1. Job Security:

Protecting local industries from low-quality imports helps secure jobs within the UK manufacturing sector. When local manufacturers can compete



fairly, they are more likely to maintain or even increase their workforce, contributing to overall employment stability.

6.4.2. Skill Development:

A robust local manufacturing industry encourages investment in workforce training and skill development. This not only benefits the ceramic industry but also enhances the broader manufacturing skill set within the UK economy.

6.5. Encouraging Innovation:

6.5.1. R&D Investment:

Anti-dumping duties on low-quality products incentivize local manufacturers to invest in research and development. This leads to innovation in product design, manufacturing processes, and material usage, keeping the UK industry competitive on a global scale.

6.5.2. Sustainability Practices:

With a focus on quality and innovation, local manufacturers are more likely to adopt sustainable practices. This aligns with the UK's environmental goals and promotes the production of eco-friendly ceramic products.

6.6. Economic Stability:

6.6.1. Market Stability:

By controlling the influx of low-quality imports, anti-dumping duties contribute to market stability. This helps local businesses plan more effectively and invest confidently in long-term growth strategies.

6.7. Balanced Trade:

Ensuring a level playing field for high-quality imports and protecting against low-quality products helps maintain a balanced trade environment. This reduces the risk of market disruptions caused by the dumping of substandard goods.

7. Factory-Level Assessment

7.1. Importance of Per-Factory Evaluation:

7.1.1. Targeted Measures:

Conducting anti-dumping assessments on a per-factory basis rather than generalising for the entire country allows for more accurate and fair-trade practices. This approach ensures that high-quality manufacturers are not unfairly penalised alongside producers of lower-quality goods. Each factory's compliance with international quality standards and their production capabilities should be evaluated individually.

7.1.2. Quality Assurance:

High-quality manufacturers often adhere to rigorous standards such as ISO 9001, SGS, and BSCI certifications. By recognising these certifications, the assessment can distinguish between factories that



produce premium products and those that do not, ensuring that only lower-quality imports are subjected to anti-dumping duties.

7.1.3. Encouraging Best Practices:

This method incentivises manufacturers to maintain high standards and invest in quality improvements, fostering a competitive environment where excellence is rewarded.

7.2. Implementing a factory-level assessment for anti-dumping measures ensures a fair and targeted approach that distinguishes between high and low-quality manufacturers. This strategy promotes high standards, encourages innovation, and protects local industries from unfair competition while allowing consumers access to premium products. By leveraging certifications and detailed evaluations, trade policies can be more effectively tailored to support quality and fairness in the market.

8. Conclusion

In conclusion, a balanced and targeted approach to anti-dumping duties on ceramic products from China is essential for protecting UK industries while enhancing consumer choice and promoting economic growth. By selectively reducing or removing duties on high-quality imports, which meet rigorous international standards, and maintaining duties on low-quality products, the UK can ensure fair competition. This strategy supports local manufacturers, encourages innovation, and aligns with consumer preferences for premium goods at competitive prices. Detailed evaluations at the factory level, rather than broad generalizations, will ensure that only substandard products are penalized, fostering a market environment where quality and excellence are rewarded.



Annexure 3

Our factory specialises in high-quality ceramic products and does not sell in the Chinese domestic market because the quality of their products surpasses the local market's standard requirements. Instead, their production is focused on the export market, where there is a higher demand for premium products that meet rigorous international standards. This strategic focus on the export market is driven by the superior quality of our products, which align with the preferences and expectations of international consumers, particularly in markets like the UK. Consequently, our pricing is competitive in the export market, offering excellent value for high-quality ceramics, as evidenced by our comprehensive testing reports. These reports demonstrate compliance with international quality standards, further supporting the high market value and competitiveness of our products in the export market compared to similar goods in the UK market.

Our products have undergone extensive quality testing by The Hong Kong Standards and Testing Centre Ltd., with results demonstrating high resistance to thermal shock, compliance with metal release standards, and excellent durability in handle strength, edge chipping, and microwave safety tests. These results, detailed in the attached reports as pdf's, confirm that our ceramic products meet rigorous international standards, substantiating their high quality and suitability for the UK market.



Annexure 4

While the current scope is broadly suitable, it could benefit from a more detailed differentiation based on product quality and specific manufacturing standards. By incorporating these considerations, the scope will ensure that high-quality manufacturers are not unfairly penalised, and that UK consumers and businesses can benefit from fair competition and access to premium products.

However, there are a few points to consider for further refinement:

1. Inclusion of High-Quality Standards:

- The scope should specifically acknowledge the high-quality standards adhered to by some manufacturers.

2. Factory-Level Assessments:

- Incorporating factory-level assessments within the scope would ensure a more precise evaluation of the goods. This approach allows for recognizing manufacturers that produce high-quality products and adhere to international standards, ensuring they are not unfairly penalized by general anti-dumping measures.



Annexure 5

With the inclusion of sub-categories for quality certifications and sustainability practices, the PCN structure would be even more comprehensive and reflective of current market dynamics. These adjustments will enhance the precision and effectiveness of the anti-dumping measures.

1. Inclusion of Certification Standards:

- Adding sub-categories that reflect adherence to international quality standards (e.g., ISO 9001, SGS, BSCI) would enhance the PCN structure. This addition would help distinguish high-quality manufacturers from those producing lower-quality goods, ensuring fair competition.

2. Sustainability and Eco-Friendliness:

- Incorporating sub-categories for sustainability practices (e.g., use of recycled materials, energy-efficient production) could be beneficial. This reflects the growing market trend towards eco-friendly products and aligns with broader environmental goals.