

## Transition review into anti-dumping measures (Interested Party / Contributor Questionnaire) Case TD0056: Ceramic tableware and kitchenware products originating in the People's Republic of China

Period of Investigation (POI):	<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="12 August 2024"/>
Contact details:	<input type="text" value="TD0056@traderemedies.gov.uk"/>
Completed on behalf of:	<input type="text" value="Ceramics UK"/>

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 at the top of this document:

X Non-confidential – will be made publicly available

Please note that you will have to provide a **Confidential** and a **Non-Confidential** version of both the questionnaire and annex, as well as any additional documents you append. All documents should be uploaded to the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)) by **12 August 2024**.

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# Introduction

## About us, this case and this questionnaire

The Trade Remedies Authority (TRA) investigates whether trade remedies are needed to prevent injury to UK industry.

The TRA will carry out a transition review of each trade remedy measure active under the EU system that the UK has decided to maintain after EU exit.

This transition review will consider whether dumping of ceramic tableware and kitchenware originating in the People's Republic of China and injury to the UK industry would be likely to continue or recur if the anti-dumping amount currently applicable were no longer applied to those goods.

## Why should I take part?

We are asking contributors and interested parties to complete this questionnaire to inform our review of whether the current anti-dumping measure should be maintained or revoked.

Please refer to our online guidance to understand more about [how we carry out transition reviews into EU measures](#) and the [differences between interested parties and contributors](#).

## How do I respond?

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

Please provide all the information requested by 12 August 2024. We may send a notice asking for clarification or supplementary information where necessary. Make sure you provide the sources for any information or data you don't own and clearly state any restrictions on sharing it.

## Where can I find more information?

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

If you have any specific questions relating to the case, now or while you're completing the questionnaire, please contact the Case Team at [TD0056@traderemedies.gov.uk](mailto:TD0056@traderemedies.gov.uk).

You can also find out more about the regulatory basis of our investigations. The TRA investigates cases under the provisions of *Trade Remedies (Dumping and*

*Subsidisation) (EU Exit) Regulations 2019 as Amended by the Trade Remedies (Amendment) (EU Exit) Regulations 2019 and under the Taxation (Cross-border Trade) Act 2018.*

## Instructions on completing this questionnaire

### Preparing your response

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

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

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

### Preparing confidential and non-confidential copies

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

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

In preparing your response, please note the following:

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

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*) and will be stored in protected systems. The non-confidential version of your submission will be placed on the public file, which is available on [www.trade-remedies.service.gov.uk/public/cases](http://www.trade-remedies.service.gov.uk/public/cases).

## How to complete this questionnaire

All statements should be substantiated with relevant data, information, and the sources of these. Please attach supporting documents in appendices to supplement your responses. To help us verify your information, please retain all your supporting documents, including any calculations made when developing your responses.

Please also note the following points:

- Do not leave any questions blank. If the question is not relevant to your organisation, please explain why. If the answer to a question is “zero”, “no” or “none”, please write this.
- If there is insufficient space in any part of the questionnaire to provide the details requested, or we ask for copies of additional information, please submit this information as appendices. Please ensure that any attachments are given a corresponding appendix reference in the title of the document and that these are referenced in the boxes provided.
- Any documents not in English should be accompanied by an English translation.
- Please provide all dates in the format DD/MM/YYYY (e.g. 23/05/2019).
- Identify all units of measurement and currencies used in tables, calculations and lists.
- For all numerical figures, where appropriate please express every third number with a comma (e.g. ‘1,300’ for one-thousand three hundred, ‘1,300,000’ for one million and three-hundred thousand).
- Please refer to the case number, TD0056, in any correspondence with the TRA.

## What happens next

Once you have completed your questionnaire responses, you must upload confidential and non-confidential versions along with any additional documents you’re providing through our [Trade Remedies Service](#). Following this:

- you will receive an email confirming the documents have been uploaded successfully;
- the Case Team will contact you if further information is required; and
- the non-confidential responses will be placed on the public file.

For further information please refer to our guidance on [how we carry out transition reviews into EU measures](#)

## The scope of this review

### Goods subject to review

This review covers **ceramic tableware and kitchenware** exported from **the People's Republic of China**, 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 codes:

**69 11 10 00 90**  
**69 12 00 21 11**

**69 12 00 21 91**  
**69 12 00 23 10**

**69 12 00 25 10**  
**69 12 00 29 10**

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

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

### Like goods

Any reference to '**like goods**' in this questionnaire refers to goods which are like the goods subject to review in all respects, or with characteristics closely resembling them and which are sold on the domestic market of the People's Republic of China, the UK market or to third countries.

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

## SECTION A: About the case

### A1 General information

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

Contact details	
Name (point of contact):	
Address:	Ceramics UK, Commerce House, Festival Park, Stoke-on-Trent, ST1 5BE
Telephone No:	
Email:	
Website:	<a href="https://www.ceramics-uk.org/">https://www.ceramics-uk.org/</a>

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

Company details	
Company registration number:	
Place of registration:	
Legal name of organisation:	
Legal structure (e.g. limited company, sole trader, partnership etc):	
Position in the organisation:	
Year of establishment:	
Other operating names:	

2. Please explain your interest in this review.

[Ceramics UK](#) is a trade association representing manufacturers of ceramics in the UK. The British Ceramic Gift and Tableware Manufacturer's Association (BCGTMA) is a sector within our membership which includes tableware, (covering hospitality, cookware, and kitchenware) and giftware members. BCGTMA is made up of 16 member companies, the majority of these are SMEs but there are also a number of large manufacturers. Our members manufacture products in the UK and are known around the world for outstanding product design, innovation, and quality. They make products which are relied upon in hard working and design led hospitality businesses, and enjoyed within the home. Many of their products are treasured by those who own or have been gifted them.

Although there is a cluster of ceramics manufacturing companies and suppliers in Stoke-on-Trent, a number of companies are also located elsewhere in the UK. Our members employ around 4,000 direct employees with many more in the supply chain, which includes raw material suppliers (e.g. Kaolin and Ball Clay from the SW of England), material processors, pigment and glaze

manufacturers, machinery and equipment manufacturers, packaging suppliers and logistics companies, to name a few.

In the historic capital of UK gift and tableware manufacture, Stoke-on-Trent (SoT), also known as The Potteries, our members and their supply chain make up some of the largest employers in the area, providing skilled employment and making a vital economic contribution to SoT, Staffordshire and beyond. This is not just about employment in the industry, but also the visitor economy. Estimates suggest that tourism in Staffordshire and Stoke-on-Trent [generates £2.3 billion for the local economy](#). In recognition of its rich heritage in gift and tableware, SoT has just been awarded [World Craft City Status](#) by the World Crafts Council, emphasising the globally rich heritage in ceramics and the social, cultural and economic contribution to the area.

### **UK market size**

Ceramics UK and Office for National Statistics (ONS) records indicate that the UK tableware market size has remained steady over recent years with some peaks and troughs reflecting market and economic changes such as recessions, factory closures and more recently, the impact of covid.

### **UK tableware manufacturers' sales and employment figures**

Ceramics UK records on UK tableware manufacturers' sales indicate a decline at the start of the 2000s up to when the measures were introduced. Both sets of data improved after the measures were introduced.

**Confidential data was presented in figures and graphs on the above, which has been redacted.**

Tableware manufacturers have an important UK customer base and also export around £200m of tableware and giftware around the world. The biggest country for exports is the United States of America which has seen exports grow in the last few years. The second biggest destination is South Korea. Exports have seen some growth to some EU countries, which remains the largest export destination in total, but have fallen in others. Saudi Arabia and the UAE make up the rest of the top 10 export destinations.

The UK ceramic tableware industry makes an incredibly important contribution to the UK in a range of ways. It is an innovative industry, both in terms of product design and manufacturing, and is also renowned for its cultural and heritage value, and this has been recognised by successive Governments and the Royal family. The economic and social value of the industry and its supply chain, especially in localities such as the cluster of Stoke-on-Trent and Staffordshire, must not be underestimated.

Appendix reference:

## A2 Information about this review

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

The UK tableware sector is recognised as a worldwide leader in product design and innovation. The industry operates in a highly competitive global environment and the markets into which it supplies are driven by high quality design, functionality, and performance. However, although the industry has successfully competed on this basis, price is also a significant factor for consumers and ever rising costs to UK manufacturers, mean that it is becoming increasingly difficult landscape in which to operate.

UK Policy and regulation impacts the sector in a number of ways, with companies often facing challenges and costs that are far greater than elsewhere. Whilst the sector supports policy and regulation that raises standards in areas such as environmental protection, health and safety and employment, it is becoming increasingly difficult to operate when the same standards and associated costs are not applied to imported products. Divergence from EU policy and regulation is also a potential issue.

### **Food Contact Regulation**

Food contact regulation sets out strict requirements for ceramic tableware, cookware, and kitchenware to ensure it is safe for consumers. Worldwide, countries have implemented different food contact material (FCM) obligations and UK companies manufacture products that meet the highest requirements.

Current EU ceramic FCM legislation sets limits for lead and cadmium exposure and this is mirrored by UK FCM regulation. However, the Commission is in the process of revising rules on ceramic FCMs and has proposed lowering migration limits for lead and cadmium and introducing limits for aluminium, arsenic, barium, cobalt, chromium, and nickel.

UK manufacturers are largely comfortable with proposals as they have worked for many years on the development of new material and glaze formulations and products are manufactured to high quality standards. However, they are concerned that when the EU implements stricter legislation, manufacturers of products which do not meet the new, significantly higher regulatory requirements, will need to find a new market and products will be diverted to the UK. This divergence in legislation and potential re-routing of imports presents a risk to the UK industry.

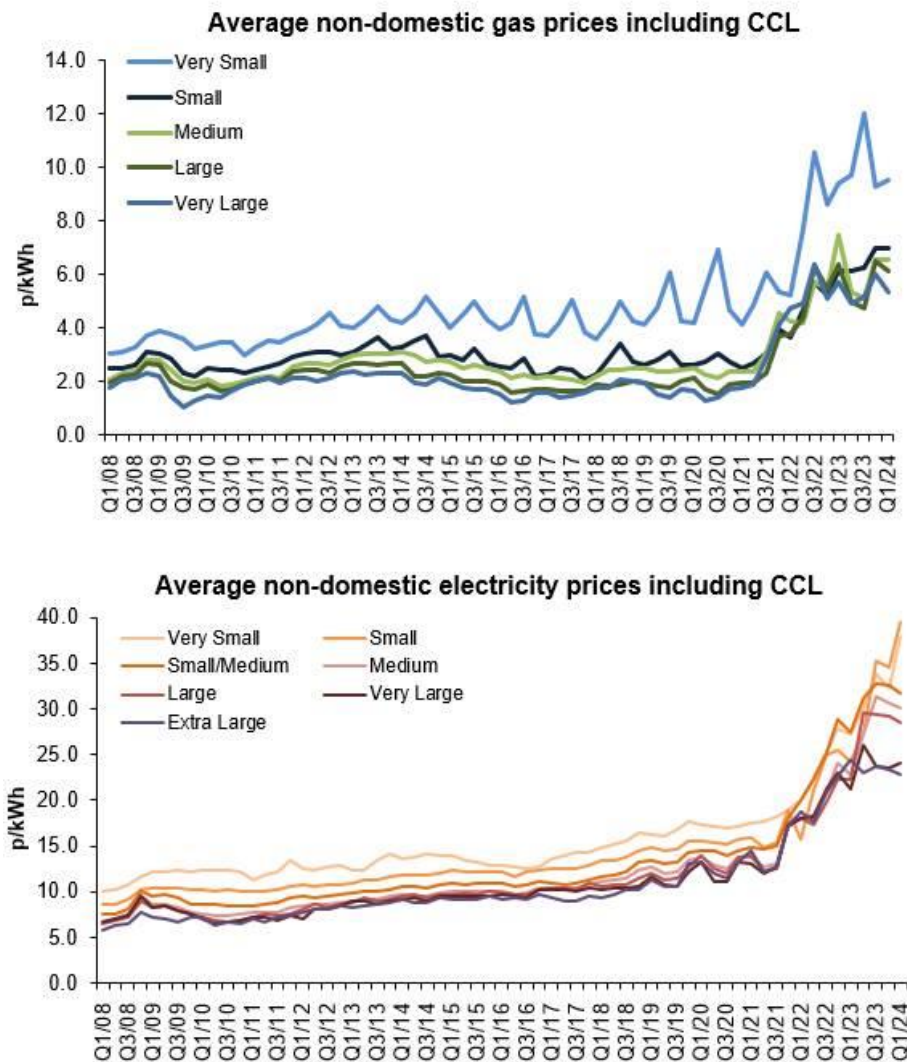
### **Energy and Climate Policy and Regulation**

Tableware businesses compete in fiercely-competitive global markets and therefore the sector's success is fundamentally reliant on internationally-competitive energy and climate costs. However, the sector is facing a considerable and growing cumulative energy and climate cost burden. The industry is recognised to be exposed to significant competitive, carbon, investment and job leakage risks meaning it cannot pass these additional costs onto its customers without impacting its international competitiveness or investment capacity, and loss of market share.

**UK industrial energy costs**

Both gas and electricity, have increased substantially in the UK over a number of decades (see Figure 1 below). Gas and electricity prices have risen more-drastrically over recent years leaving members reeling from the impact of this on their businesses. Energy prices are impacted by a range of factors, including government policy, geopolitics and weather conditions and this volatility from an already relatively high-cost base, puts significant pressure on manufacturers.

**Figure 1: Prices of fuels purchased by non-domestic consumers in the UK (2008 – Q1 2024)<sup>[1]</sup>**



**Decarbonisation of ceramic production**

Ceramics manufacturing is an energy intensive process with kilns needing to fire products at over 1000 degrees centigrade to produce the necessary product characteristics (ensuring tableware is safe, long-lasting, durable and can be used thousands of times). The primary fuel currently used is natural gas although electricity is also used for some processes and smaller-scale output. Firing with electricity is much more expensive than gas, as illustrated in Figure 1 above.

<sup>[1]</sup> [Gas and electricity prices in the non-domestic sector - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/gas-and-electricity-prices-in-the-non-domestic-sector)

Our members are fully committed to contributing to the delivery of a net zero society and are progressing various activities to innovate and implement changes. In particular the sector is exploring the use of hydrogen for firing. Although electrification may play more of a role in future, grid capacity constraints are presently a significant barrier, and grid connection and infrastructure upgrade costs would be significant.

However, the costs to invest and operate new plant must also not undermine UK tableware manufacturer's ability to compete with overseas producers, many of whom do not have an equivalent level playing field in terms of obligations / costs in tackling climate change where they are produced.

### **Wider concerns**

In the last few years, the impact of Brexit, the Covid pandemic and the cost-of-living crisis and has impacted the industry.

Brexit has made it more expensive and complex to export to the EU, which as a whole remains the largest destination for tableware exports. Increased costs and bureaucracy for manufacturers led to a reduction in the value of tableware exports to the EU of around a 1/3<sup>1</sup> and they haven't recovered to previous levels as of 2023.

Covid badly affected the industry with the closure and/or operation of businesses at a reduced capacity for a period of time.

The cost of living in the UK rose sharply during 2021 and 2022 which directly affected tableware businesses and the ability of UK households to buy goods and spend money on leisure activities, including eating out. Inflation peaked at 11.1% in October 2022, the highest in 41 years. The hospitality sector has also been seen a number of closures, with [up to 8 sites a day closing in 2023](#), which has had a knock on impact on suppliers. There is pressure throughout the supply chain to reduce costs. UK manufacturers have faced significant inflationary cost increases, which has put them under significant pressure from customers - these costs cannot always be passed on.

Our members support increasing the living standards of the lowest paid. Unfortunately, the increase in the minimum wage of around 20% between 2022 and 2024 has added significantly to the cost pressures on their businesses and was implemented by Government with little notice. This has caused further complication by eroding pay differentials between staff.

The discrepancy in the cost to produce in this country vs China continues to be a major challenge for the industry in the UK.

Appendix reference:

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

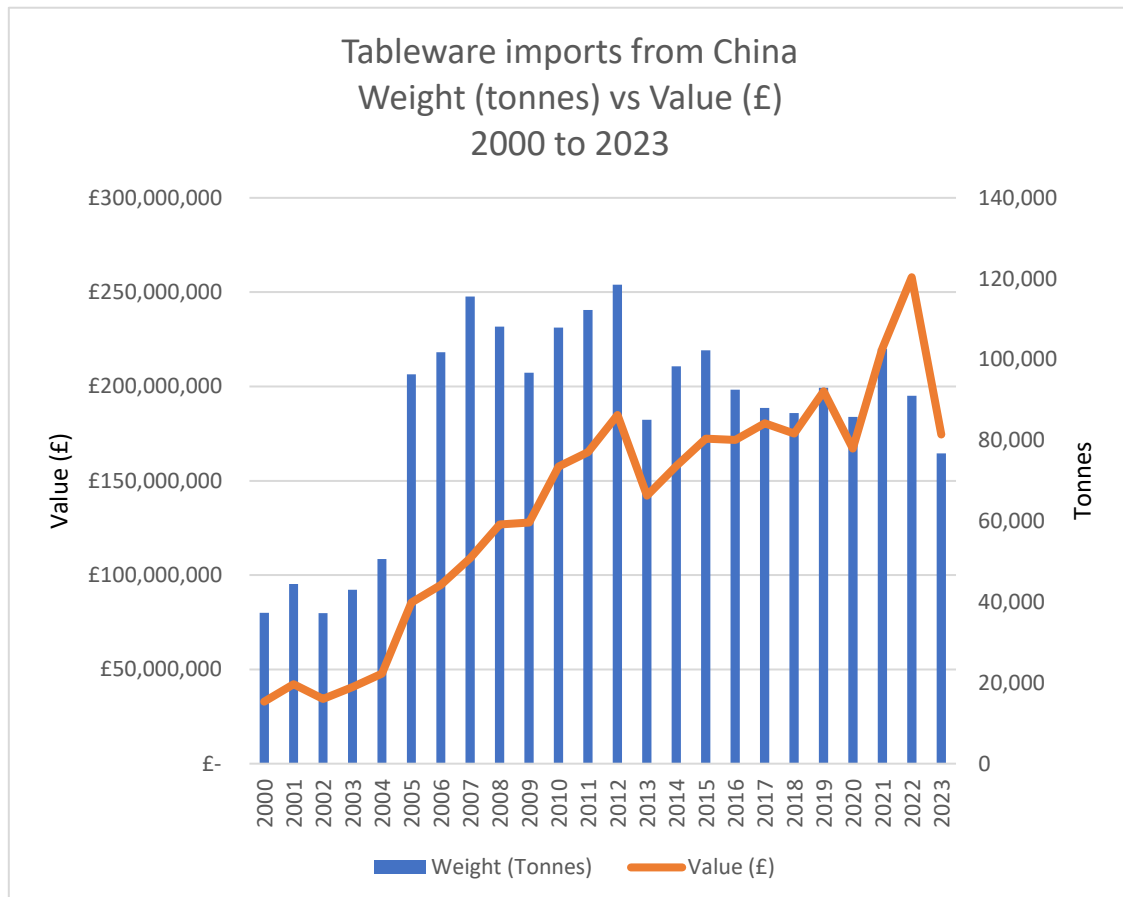
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<sup>1</sup> 2019 vs 2021 in value, data from UK Trade Info.

Yes, as shown in Graph 1 below, tableware imports to the UK grew significantly in the years following China's membership of the World Trade Organisation in 2001.

It also shows that when provisional measures were introduced for Chinese imports in November 2012, imports to the UK by value and weight reduced in the following year and have remained relatively stable. By weight imports from China have never returned to the levels seen in 2011 just before the measures were introduced.

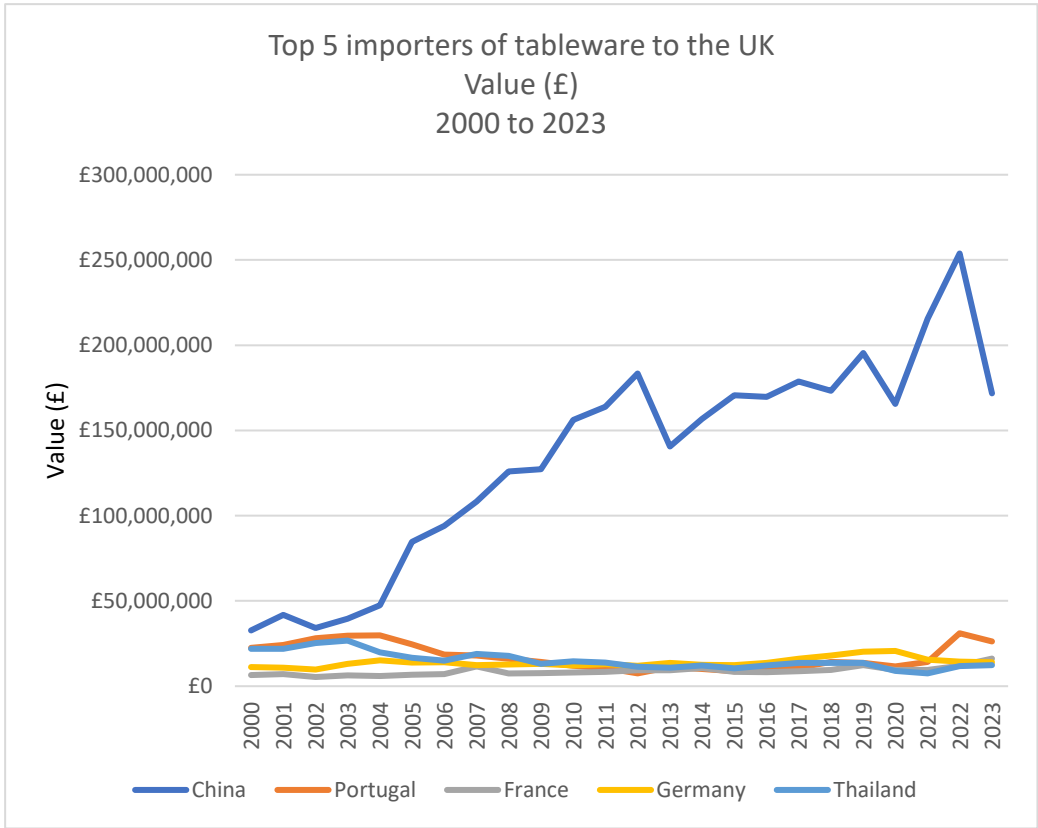
**Graph 1: Total tableware imports to the UK from China weight and value, 2020 to 2023.<sup>2</sup>**



Graph 2 below shows that China dominates tableware imports to the UK:

<sup>2</sup> UK Trade Info data

**Graph 2: Top 5 Country importers of tableware into the UK, 2000 to 2023.<sup>3</sup>**



By value Chinese imports are currently around 60%, by weight Chinese imports are around 70% of all imports.

China has a well-established ceramic manufacturing industry with some traditional and artisanal production alongside very high-volume modern production – with the latter forming the majority. While most UK manufacturers support tariffs, there are some differing views.

Appendix reference:

3. Please provide any information about the possible economic effects on the UK if the existing anti-dumping measure on the **goods subject to review** were to no longer be applied.

<sup>3</sup> Data from UK Trade Info

**Specialist skills**

Many of the skills used in tableware production, such as mould makers, casters, and decorators, are unique, highly valued and at risk, especially as a number of UK manufacturers have distinct and/or bespoke processes. For example, there is one company that continues to tissue-print their tableware in the same way that has been done for nearly 200 years. These specialist skills need to be maintained and the cluster of tableware manufacturers in Stoke-on-Trent allows companies to share resources and support one another on topics such as training and skills. This aids not only the tableware sector but also the wider ceramics industry who also benefit from the pool of knowledge, skills and expertise such as kiln refurbishment and maintenance.

**Impact on the economy**

Our members make a significant economic contribution to the UK (exact figure redacted). Particularly in SoT, and also beyond this cluster, for example in Derbyshire and also other places where they are locally important. Companies are providing skilled employment, including in the supply chain, and provide a wide variety of different opportunities for individuals.

The SoT cluster supports suppliers locally and further afield in the UK, who are reliant on the industry and vice versa. The industry's supplier base has reduced over time and there is the concern that if the manufacturing industry contracted, it would no longer be feasible for some companies to supply the industry, with potential repercussions for the whole sector.

Appendix reference:

4. If you have any other information which may help us with this review, such as UK or PRC prices of ceramic tableware and kitchenware, volume, supply and demand of these products, and anything else you deem relevant, please provide it below.

The ceramic tableware trade association in Europe recently commissioned a report into the tableware industry in China ([THINK!DESK China Research & Consulting 2024, Market-Distortions in the Chinese Tableware Ceramics Industry](#)). This report explains how the tableware industry in China has moved from traditional craftsmanship and techniques to large scale mechanised plant equipment to facilitate cost efficient volume production and is the leading exporter in the world. The industry is supported by 87 dedicated ceramics industry parks which have generous investment promotion to encourage new entrants.

China is the leading producer of tableware in the world, with the daily output of 'daily-use' ceramics increasing to 65.3 billion pieces in 2022 from 40.9 billion pieces in 2014 – an increase of approximately 60% (Qianzhan Industry Research 24.10.2021). There is a very large overcapacity of daily use ceramics which is now facing sluggish sales at home and in export markets.