

Non-Confidential

26 December 2023

Transition Review No. TD0027

Anti-dumping duties - Ceramic Tiles from The People's Republic of China

Comments on Evidence of The Ketley Brick Company Limited and Ibstock PLC

Submitted on behalf of

**CHINA CHAMBER OF COMMERCE OF METALS, MINERALS &
CHEMICALS IMPORTERS & EXPORTERS (CCCMC)**

Reference is made to the UK transition review TD0027 concerning anti-dumping duties imposed on ceramic tiles from China.

It has been noted that two Notes to Public File were recently published on the website of Trade Remedies Authority (TRA) on December 20 and 21, 2023 respectively, which are the submissions of evidence of The Ketley Brick Company Limited and Ibstock PLC.

The following comments are submitted on behalf of the China Chamber of Commerce of Metals, Minerals and Chemicals Importers and Exporters (CCCMC) on these two notes.

First, when releasing these two notes, TRA did not specify if and for how many days other interested parties are entitled to provide their comments on them - while the review proceeding is approaching its final stage, submissions or notes to public files containing factual information kept released, CCCMC submits that reasonable scrutiny shall be given by the TRA to ensure the due process and protection of equal procedural/legal right among interested parties.

Second, as stated in both notes, both The Ketley Brick Company Limited and Ibstock PLC failed to participate/cooperate in this proceeding, therefore CCCMC doubts if evidence from these non-participating/non-cooperating parties shall be taken into account.

Third, for the two documents, it is clear that both companies' products are not usually recognized as ceramic tiles – subject goods of this review, classifiable within the following commodity codes: 6907 2100 00; 6907 2300 00; 6907 4000 00; 6907 2200 00 and 6907 3000 00. For example, it is well acknowledged by the ceramic tile industry that brick slips, the product discussed/focused by both notes is not ceramic tile. CCCMC's member companies indicate that brick slips are usually

subject to HS code 6904 10 or 6904 90.

Search on Bing.com by using “brick slips” brings pictures like below, which also makes it clear that brick slips produced and marketed by both companies are more like bricks rather than ceramic tiles:



Genuine Handmade Brick Slips - Imperial Size



What are Brick Slips? - Build It



Why Brick Slips Are Great for Commercial Use - House Integrals

Similarly, another product discussed in the evidence of The Ketley Brick Company Limited, Quarry tiles, the pictures of which are provided below, is usually not acknowledged as ceramic tiles.



Z* SOLD OUT - Reclaimed 11 x 11 Inch Terracotta / Red Quarry Tiles ...



Reclaimed Red Quarry Tiles 6x6"

Consideration shall also be given to the fact that the vast majority of the subject goods imported from China during the review period were porcelain tiles (with water absorption rate of 0.5% or below), for which CCCMC has requested product exclusion, which is totally different from the products mentioned in these two notes.

Based on the above discussions, CCCMC respectfully requests the TRA not to take into consideration the information contained in these notes.

CCCMC remains at the disposal of the TRA should there be any further questions regarding the above comments.