



Statement of essential facts

Review No. TD0056

Transition review of anti-dumping duties applying to certain Ceramic Tableware and Kitchenware products originating in the People's Republic of China (PRC)

12 June 2025



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Section A: Introduction

1. This section briefly summarises the legal framework for this statement of essential facts (SEF) and the Trade Remedies Authority (TRA)'s main findings. The background to and details of the review (see also [Section C: Background](#)) are set out in the subsequent sections.
2. This SEF sets out a summary of the essential facts considered by the TRA during the review. It should be read in conjunction with other public documents available for this case, which are available on the [public file](#). The purpose is to set out our intended final recommendation, provide interested parties and contributors with a summary of the facts considered during this review, and those facts which formed the basis of our intended final recommendation. Additionally, we inform interested parties and contributors who have supplied information how we have used that information during the review, provide details of the analysis forming the basis of the intended final recommendation and allow interested parties to make submissions in response.
3. Interested parties, contributors and any other person who has supplied information to the TRA are invited to make submissions within 21 calendar days of the publication date of this SEF, *i.e.*, before 23:59 hours (UK time) on 03 July 2025, pursuant to regulation 62(2) of The Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 (S.I. 2019/450) (as amended) ("the Regulations").
4. Any submissions received after this date may not be accepted by the TRA if to do so would significantly impede the progress of this transition review. Where the TRA rejects information for any reason, it will publish the reasons for rejection in the final recommendation.
5. Registered interested parties and contributors to the case can make submissions on the [Trade Remedies Service](#) online platform (TRS). Submissions containing confidential information must be accompanied by a non-confidential summary of the submission for the public file (see regulation 45(6)(a) of the Regulations). Those not registered on the TRS may send submissions by email to TD0056@traderemedies.gov.uk. Submissions via email containing confidential information must also be accompanied by a non-confidential summary for the public file.
6. In exceptional circumstances it may not be possible to summarise confidential information. If this is the case, interested parties and contributors must provide a 'statement of reasons' setting out the reasons why the TRA should treat the information as confidential and why summarising the information is not possible, as defined under regulation 45(6)(b) of the Regulations.
7. For further information regarding transition reviews, please see our [public guidance](#).



A1. Legal framework

8. This SEF is made pursuant to regulation 62 of the Regulations. It includes:
- the recommendation that the TRA intends to make;
 - a summary of the facts considered during the investigation;
 - those facts referred to in the summary that formed the basis of the intended final recommendation;
 - details of how the TRA has used the information supplied by interested parties and contributors in making the intended final recommendation; and
 - details of the analysis forming the basis of the intended final recommendation.

A2. About this review

9. This is a transition review of a United Kingdom (UK) trade remedies measure under regulation 97 of the Regulations, specified in the [Notice of Determination 2020/30](#). This UK measure gives effect to European Union (EU) [Commission Implementing Regulation \(EU\) 2019/1198](#) of 12 July 2019. The EU measure transitioned into UK law, and as set out in [Taxation Notice 2020/30](#), took effect as a UK measure on replacement of EU trade duty.
10. The TRA conducted 2 separate new exporter reviews concerning this measure before initiating this transition review.
- The first of them (case no. [NE0043](#)) was initiated at the request of “Hunan Jewelmoon Ceramics Co., Ltd” (“Jewelmoon”) where the TRA determined that Jewelmoon was a new exporter and the non-sampled, co-operating overseas exporter anti-dumping amount of 17.9% (as detailed in [Annex 3](#)) should be applied to its goods, backdated to the date of initiation of the review on 20 September 2023 (see [Trade remedies notice 2024/05](#)); and
 - The second review (case no. [NE0048](#)) was initiated at the request of “Linyi Hongshun Porcelain Co, Ltd”, which was also determined to be a new exporter to whom the non-sampled, co-operating overseas exporter anti-dumping amount of 17.9% (as detailed in [Annex 3](#)) should be applied, backdated to the date of initiation of the review on 20 December 2023 (see [Trade remedies notice 2024/09](#)).
11. This review concerns an anti-dumping measure applying to certain Ceramic Tableware and Kitchenware products (CT&K) originating in the PRC. This review was initiated on 15 May 2024 and the [Notice of Initiation](#) (NOI) was published on this date.
12. The period of investigation (POI) is 1 April 2023 to 31 March 2024. To assess injury, the TRA has chosen the period from 1 April 2020 to 31 March 2024 as the injury period (IP).



Section B: Summary and findings

B1. Likelihood of dumping

13. In accordance with regulation 99A(1)(a) of the Regulations, we assessed whether dumping of the goods subject to review would be likely to continue or recur if an anti-dumping amount was no longer applied to those goods (the likelihood of dumping assessment).
14. We determined that it is likely, on the balance of probabilities, that dumping of CT&K from the PRC would continue in increased volumes if the anti-dumping measure under review were no longer applied to the goods subject to review. For further detail, see [Section F: Likelihood of dumping assessment](#).

B2. Likelihood of injury

15. 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 measure were no longer applied to the goods subject to review (the likelihood of injury assessment).
16. We determined that it is likely, on the balance of probabilities, that injury to the UK industry in the like goods would recur if the measure were no longer applied to the goods subject to review. For further detail, see [Section G: Likelihood of injury assessment](#).

B3. Economic interest test (EIT)

17. Having considered all evidence gathered, including that presented by interested parties and contributors, and all factors listed in the legislation (see paragraph 25 of Schedule 4 to the Taxation (Cross-border Trade) Act 2018 (“the Taxation Act”)), we have concluded that varying the measure meets the EIT. Therefore, we intend to advise the Secretary of State for Business and Trade (Secretary of State) that we consider that the proposed variation of the measure in accordance with our intended final recommendation meets the EIT, pursuant to regulation 100(1E) of the Regulations. For further detail, see [Section H: Economic Interest Test \(EIT\)](#).



B4. Intended final recommendation

18. In accordance with regulation 100(1) of the Regulations, the TRA must make a recommendation following a transition review to vary or revoke the application of the anti-dumping amount to the goods subject to review.
19. Our intended final recommendation is to vary the application of the anti-dumping amount applicable to the goods subject to review pursuant to regulations 100(2)(a)(i) and 100A of the Regulations, so that it applies to those goods imported into the UK until 16 July 2029 – that is, five years subsequent to the date when the measure would have otherwise expired (16 July 2024) had no transition review been initiated.
20. We did not receive any compelling evidence providing reasons for us to consider whether it was appropriate to recalculate the anti-dumping amounts. Furthermore, as it was not possible to recalculate the anti-dumping amount nor the injury margin, due to the limitations in the data received from interested parties throughout the review process, pursuant to regulation 100A(4)(b) of the Regulations, we intend to recommend maintaining the anti-dumping amounts applicable to the goods subject to review.
21. The description of the goods to which the measure applies (that is, the goods subject to review) is set out in [Section D: The goods and like goods](#). We have not considered it necessary to vary the goods subject to review or the description of those goods, nor have we received any comments or indications that we should consider doing so. We intend to recommend that the duties specified in [Annex 1](#), [Annex 2](#) and [Annex 3](#), shall be maintained and applied to the goods subject to review imported under the UK tariff codes listed.
22. We intend to make this recommendation on the grounds that we have assessed that it is likely that dumping would continue in increased volumes if the measure were no longer applied to the goods subject to review; that is likely that injury would recur to the UK industry in the like goods if the measure were no longer applied to the goods subject to review; and that we consider that the proposed variation of the measure in accordance with our intended final recommendation meets the EIT.
23. In reaching this intended recommendation, we also considered the current and prospective impact of the measure, pursuant to regulation 100A(2)(b) of the Regulations.



Section C: Background

C1. Initiation of the transition review

24. The UK chose to maintain certain trade remedy measures once it was outside the EU's common external tariff. The 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.
25. For each of these measures, the Secretary of State for International Trade (now the Secretary of State for Business and Trade) 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.
26. As mentioned in section A2, on 31 December 2020 the Secretary of State published [Notice of Determination 2020/30](#) regarding the anti-dumping duty on CT&K 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.
27. Under regulation 97C of the Regulations, this measure will continue to apply to the goods subject to review until the Secretary of State publishes a notice accepting or rejecting a TRA recommendation to vary or revoke the application of the anti-dumping amount following the conclusion of this transition review.
28. The current rates of anti-dumping duty which apply to the relevant goods exported from the PRC can be seen in [Annex 1](#), [Annex 2](#) and [Annex 3](#).

C2. Participation in the review

29. The TRA invited interested parties and contributors to register in order to participate in the review.
30. The following section lists the interested parties that registered to the transition review.



C2.1 Interested parties & contributors

C2.1.1 UK producers

31. The following four UK producers registered an interest in the case.

- Churchill China (UK) Ltd (Churchill China);
- Dunoon Ceramics Ltd ('Dunoon');
- Denby Group Ltd ('Denby'); and
- Steelite International Limited ('Steelite').

32. We only received one completed questionnaire response from Churchill China, and one partial questionnaire response from Dunoon.

C2.1.2 UK importers

33. The following four UK importers registered an interest in the case, although we only received one partial response from one of the anonymous UK importers.

- Captivate Brands Ltd;
- Inter Table Top Company;
- Anonymous; and
- Anonymous.

C2.1.3 PRC exporters

34. Given the very large number of responses received during the registration period, pursuant to regulation 56 of the Regulations, the TRA limited its examination to a sample of overseas exporters for the purposes of the dumping likelihood assessment. The TRA published a notice of [proposed sample](#) on 21 June 2024 that was based on the largest volume of exports reported by the exporter.

35. The overseas exporters selected to be within the sample were:

- Hunan Quanxiang Ceramics Corp. Ltd ('Hunan Quanxiang');
- Liling Top Collection Industrial Co., Ltd ('Liling Top');
- LINYI JINGSHI CERAMICS CO., LTD ('Linyi Jingshi'); and
- Hunan Hualian China Industry Co., Ltd ('Hunan Hualian').

36. The TRA then published a notice of [final sample](#) on 01 July 2024 confirming the same list of sampled overseas exporters. All of them submitted questionnaire responses.

37. Another exporter made a submission later: Hunan Xiaofeng Ceramic Industry Co., Ltd.

38. As part of its questionnaire response, Hunan Hualian submitted 3 sets of documents which included responses from two associated parties: "Hunan Hualian Ebillion China Industry Co., Ltd." ('Ebillion'), and "Hunan Liling Hongguanyao China Industry Co.,



Ltd.” (‘Hongguanyao’). For the purposes of this review, these three companies were collapsed into the “Hunan Hualian Group”.

C2.1.4 Foreign Government

39. The Government of the PRC (‘GOC’) registered its interest in the case through its Ministry of Commerce (‘MOFCOM’), but did not submit a questionnaire response.

C2.1.5 Contributors

40. Ceramics UK registered its interest in the case and submitted a questionnaire response.
41. China Chamber of Commerce for Import and Export of Light Industrial Products and Arts-Crafts (‘CCCLA’) also registered its interest in the case and submitted a questionnaire response.

C3. Use of information

42. The TRA has had regard to the information supplied by interested parties and contributors, provided that this information:
- complied with the applicable statutory requirements and the TRA’s public guidance;
 - was verifiable;
 - could be used without undue difficulty; and
 - was supplied within an applicable time limit and in a form that the TRA requested.
43. [Annex 4: Interested Parties and Contributors](#) contains a summary of information received from all interested parties and contributors.
44. Relevant non-confidential submissions made to this review were published and are available on the [public file](#).
45. Secondary source information was used in accordance with the Regulations. This information was treated with special circumspection and, where practicable, verified using independent sources. This included, but was not limited to, official import statistics and data pertaining to relevant markets.

C4. Verification of data

46. The TRA undertook verification activities in relation to the information provided by the cooperating interested parties, during which the completeness, relevance and accuracy of that information was assessed.



47. The TRA conducted on-site verification activities with Churchill China from 14 to 16 October 2024.
48. A non-confidential version of the verification report in respect of Churchill China is available on the [public file](#).
49. Where data was not considered to be verifiable, the areas have been highlighted and the TRA has drawn conclusions based on facts available where possible.

C4.1 Analysis of trade data

50. In this review, CT&K is identified by reference to commodity codes at the 10-digit level. However, raw HMRC Customs declaration data with 10-digit commodity codes is not publicly available, and what is available (at 8-digit or 6-digit level) will contain products outside the scope of this review. Where practicable, we have used 8-digit data, as this will contain a greater proportion of CT&K products in-scope, compared to 6-digit data.
51. Trade data has been obtained using both Cost, Insurance and Freight (CIF) import data, and Free on Board (FOB) export data. Use of these International Commercial terms (Incoterms) means the import/export values are not directly comparable to an Ex Works (EXW) price.
52. Our trade data considers country of dispatch. Where possible, we have compared country of dispatch to country of origin data.
53. We acknowledge there may be limitations in our analysis, but assess these are not significant enough to undermine our overall conclusions.



Section D: The goods subject to review and the like goods

D1. Goods subject to review

54. The goods subject to review are identified as certain Ceramic Tableware and Kitchenware products (CT&K) originating in the PRC and exported to the UK, described in the [NOI](#) 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”.

55. The commodity codes under which these goods are classified are:

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

D2. Like goods

56. In accordance with paragraph 7 of Schedule 4 to the Taxation Act, ‘like goods’ are those goods which are like the goods subject to review in all respects or, if there are no such goods, goods that have characteristics which closely resemble those of the goods subject to review.

D3. Assessment of the goods

57. CCCLA, on behalf of members of the PRC industry, requested that a distinction should be drawn between premium / branded and generic / mass-market goods.
58. We assess that such a distinction would be impossible as there is no objective line which would divide the two classes of goods. Even if there were, we assess that the two classes of goods would still exhibit almost all of the same physical and commercial characteristics and would still act as functional substitutions for each other.
59. We are satisfied that the goods manufactured in the UK are like the goods subject to review for the purpose of this transition review.



Section E: The UK industry and market

E1. UK industry

60. Paragraph 6(1) of Schedule 4 of the Taxation Act defines a UK industry in particular goods as either:
- all of the producers in the UK of the like goods, or
 - those of them whose collective output of like goods constitutes a major proportion of the total production in the UK of those goods.
61. Whilst we are aware of 20+ UK producers, we only received Pre-Sampling Questionnaire (PSQ) responses from the following four producers: Churchill China, Denby, Dunoon, and Steelite. Collectively, these four companies produce and sell approximately £97m worth of like goods in the UK each year.
62. We then only received questionnaire responses from Churchill China and Dunoon which we will hereby refer to as the 'participating UK producers'.
63. Whilst we are aware that there are other producers of the like goods in the UK, as they have not engaged with this transition review, we are unable to include them in our assessments.
64. Therefore, even though we have determined that all the producers in the UK of like goods constitute the UK industry for this review, we have had to rely upon limited data from the participating UK producers in section [G2. Current state of the UK industry](#).

E2. Production process

65. The production of CT&K is extremely varied and consists of producing and forming of clays and slips, and the drying, decorating and firing formed goods.
66. Differentiation between goods is largely based on the constituency of the body material, the shape of the good, the number and temperature of firing and the quality of decoration.

E3. Market size and structure of the UK industry

67. CUK have estimated the value of the UK ceramics market as approximately £350m annually. This is in keeping with headline estimates suggested by other market research organisations such as [Zion market research](#).



68. As registered producers have indicated that they produce and sell £97m worth of like goods in the UK each year, we assess that the majority of UK demand is fulfilled by imports.

E3.1 Downstream trends and preferences of the like goods

69. CT&K are predominantly consumer goods. Virtually every UK household and most hospitality businesses will own and use some form of CT&K.

70. As these goods are frequently used and vulnerable to breakage, we assess that they are periodically replaced in many cases. A UK market report by Mintel highlights that 73% of UK consumers bought a piece of CT&K in the last 12 months in 2022 ([UK Tableware and Cookware Market Report 2022](#)).

71. As CT&K is extremely heterogenous and is replaced periodically, we assess that consumers constantly re-assess what they want from the goods that they own. Factors consumers consider include (amongst others):

- Scratch and chip resistance;
- Weight;
- Thermal resistance;
- Thickness;
- Dishwasher / microwave tolerance;
- Quality and / or method of decoration;
- Material, *i.e.* bone china, porcelain, stoneware; and
- Brand, region or heritage.

72. We assess that each of these factors are weighed differently and at different times depending on the needs of the consumer, the availability of alternatives and fashion. We assess that in most cases, these factors are most frequently leveraged directly against the price of the good.



Section F: Likelihood of dumping assessment

F1. Introduction

73. In accordance with regulation 99A(1)(a) of the Regulations, we have considered 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.
74. We have considered the likelihood of dumping on a countrywide basis.
75. The dumping likelihood assessment considered:
- whether the conditions for dumping exist ([F2](#)); and
 - whether the incentives for dumping exist ([F3](#)).
76. In assessing whether the conditions for dumping exist, the TRA considered:
- whether dumped imports into the UK have continued whilst the measure has been in place ([F2.1](#));
 - production capacity (current and future) and production levels ([F2.2](#));
 - inventory levels ([F2.3](#)); and
 - ability to shift production to the goods subject to review ([F2.4](#)).
77. In assessing whether incentives to dump exist, the TRA considered:
- market prices in the UK and the overseas exporters' domestic market ([F3.1](#));
 - exports to third countries ([F3.2](#));
 - conditions in the exporters' domestic market ([F3.3](#));
 - how attractive the UK is to exporters ([F3.4](#)); and
 - whether exporters have previously circumvented or absorbed measures ([F3.5](#)).

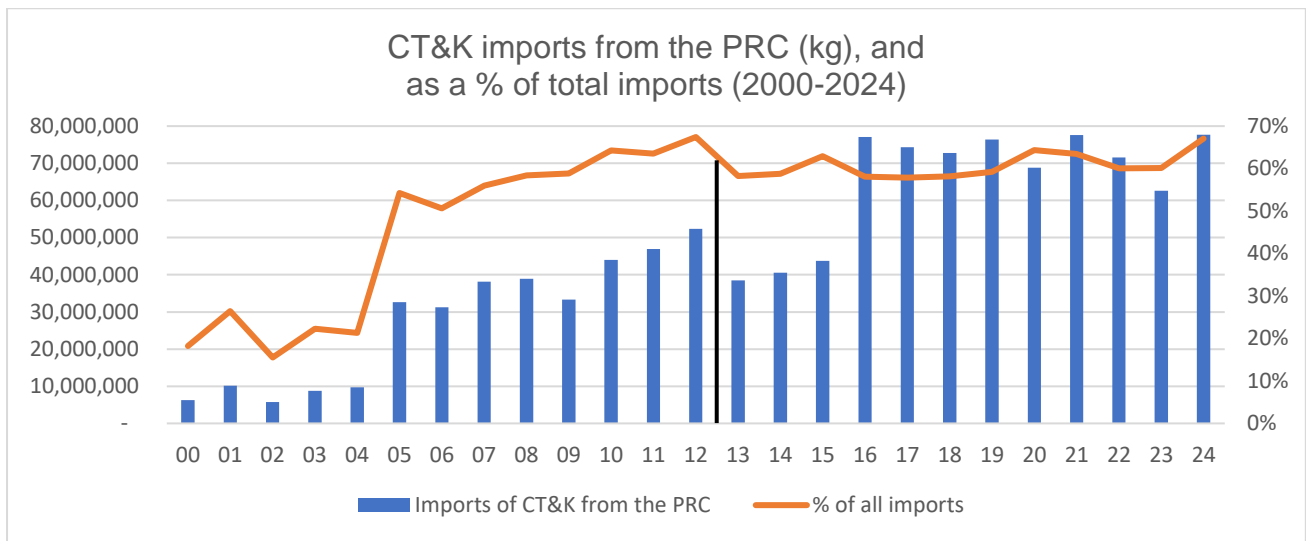
F2. Assessment of ability to export dumped goods

F2.1 Continued dumping

78. We assessed whether there has been a continuation of imports of CT&K into the UK from the PRC.
79. On [13 May 2013](#), the EC implemented definitive anti-dumping duties on imports of the goods subject to review. Figure 1 (below) shows the volume of imports of CT&K into the UK from the PRC both in kg and as a percentage of total imports of CT&K into the UK from 2000 to 2024. The black vertical line denotes implementation of the [provisional measure](#) applied by the EC, subsequently confirmed by its definitive measure.



Figure 1: CT&K imports from the PRC (kg), and % of total imports (2000-2024)



Source: HMRC Overseas Trade in Goods Statistics (OTS)

80. Following the imposition of the measure, imports of CT&K from the PRC reduced for the following three years, but then stayed high from 2016, ending at 77,656,676 kg (67% of all imports) in 2024.
81. Table 1 (below) shows the volume of imports (in kg) of CT&K into the UK from the PRC only, and from all countries (including the PRC), during the IP (using 8-digit data).

Table 1: Imports of CT&K to the UK in kg (over the IP)

8-digit data	2020-21	2021-22	2022-23	2023-24 POI
UK imports of CT&K from the PRC (kg)	71,191,423	81,748,528	61,653,272	66,415,017
UK imports of CT&K from all countries (kg)	108,480,350	127,357,281	107,359,344	107,394,731
PRC proportion of CT&K imports (%)	66%	64%	57%	62%

Source: HMRC Overseas Trade in Goods Statistics (OTS)

82. The import data shows that there has been a continuation of imports of CT&K into the UK from the PRC regardless of the measure being in place, and that the imports from the PRC represent a significant majority of all imports. This means that the PRC industry has maintained trade channels to the UK that could be easily used in the future to increase import volumes further.
83. We also assessed whether these imports were at dumped prices (i.e., how does the average export price compare to an indicative domestic sales price in the PRC).



84. Analysis of PRC domestic and export pricing identified that exports from the PRC were entering the UK market at dumped prices during the period of investigation. This was before considering the potential effect of a particular market situation (PMS).

F2.2 Production capacity and production levels

85. The PRC is by far the largest global exporter of CT&K in the world. It accounts for around 74.21% (by volume) and 64.91% (by value) (averaging at 70%) of the world’s exports in 2023 (according to data from [Global Trade Tracker \(GTT\)](#)). This aligns with the European Commission’s estimate (within the latest [expiry review](#)) that the PRC “accounts for around 70% of the world’s overall exports” of CT&K.

Table 2: PRC % of world exports by volume (kg) and value (£) (2021-2024)

6-digit data	2021	2022	2023	2024
World Volume of Exports	3,084,409,571	2,877,976,991	2,788,083,488	3,068,336,427
PRC Volume (kg)	2,146,985,877	2,045,939,047	2,068,923,016	2,375,455,107
PRC Volume (%)	69.61%	71.09%	74.21%	77.42%
World Value of Exports	8,226,763,537	9,802,788,256	9,011,283,322	8,505,753,995
PRC Value (£)	5,389,773,427	6,483,940,375	5,849,288,051	5,522,436,217
PRC Value (%)	65.52%	66.14%	64.91%	64.93%

Source: [GTT](#)

86. According to [Grand View Research](#) and [Zion Market Research](#), the global CT&K market is likely to grow above a compound annual growth rate (CAGR) of between 4.4% and 6.5% respectively between 2022-2030.
87. Over the POI, the declared exports from the 400+ registered PRC exporters amounted to 55,745,798 kg worth around £126,674,631 (conversion rate of [1 CNY to £0.1097](#)). This corresponds to a level of cooperation of approximately 79%. We assess this to be a high level of cooperation for a fragmented industry like the PRC’s CT&K industry.
88. According to the PSQ responses from the 400+ registered PRC exporters:
- the total production capacity for registered overseas exporters during the POI was 2,013,496,889 kg / 3,884,347,196 units (average weight of 0.52 kg per unit);
 - the overall production during the POI was 1,366,620,838 kg, which means that the collective capacity utilisation is around 68%. This leaves an excess capacity of 646,876,051 kg / 1,242,808,296 units; and
 - PRC domestic sales in the POI accounted for around 26% of overall production which means that 74% of all production was exported (around 4% went to the UK).
89. Based on estimates provided by Ceramics UK, [Zion Market Research](#), and [Spherical Insights](#), the TRA determined that the estimated the size of the CT&K market in the UK is around £350m. We were not provided with figures regarding the size of the CT&K market in the UK in volume (kg or units).



90. Based on the production capacity for registered overseas exporters during the POI, and the average price of exports from the PRC of £2.11 / kg (based on 8-digit import data), this would be worth £4,248,478,435. Production capacity of such magnitude means that the PRC alone could cover the estimated UK market size multiple times.
91. Questionnaire responses showed that the average capacity utilisation for the four sampled overseas exporters is around 69% (similar to the collective capacity utilisation of all registered exporters).
92. Based on the evidence available, CT&K is being produced in the PRC at volumes that significantly exceed UK consumption, and the global CT&K market is also expected to grow.

F2.3 Inventories

93. Table 3 (below) shows the trend regarding closing stock (in kg) for each of the sampled overseas exporters.

Table 3: Closing stock of CT&K from the sampled overseas exporters (index 2020-21 = 100)

	Exporter	2020-21	2021-22	2022-23	2023-24
Closing stock	Hunan Quanxiang	100	178	60	186
	Liling Top Collection	100	47	45	33
	Linyi Jingshi	100	130	139	13
	Hunan Hualian Group	100	89	85	74

Source: Questionnaire annexes

94. On average, the sampled overseas exporters held 7% of their production as stock. Based on the questionnaire responses for each of the overseas exporters, the industry standard is to produce CT&K to order rather than building up a large stock of inventory. We assess that this is also the case for the majority of the UK industry based on our interaction with some of the UK producers, although Churchill seem to maintain high levels of stock.
95. Although the stock levels for overseas exporters are low, they claim to produce to order and have existing trade channels to the UK that could be easily used in the future to increase import volumes further (as discussed in section [F2.1 Continued dumping](#)). Also, due to the high levels of unused capacity in the PRC, they could quickly produce and sell higher volumes of CT&K to the UK without disrupting their existing domestic / export sales obligations.

F2.4 Ability to shift production to the goods subject to review

96. As discussed in section [F2.2 Production capacity and production levels](#), the PRC's capacity utilisation is around 68%. This leaves an excess capacity of 646,876,051 kg.



Using the estimated £2.85 per kg ([GTT](#)), this would be worth £1,843,596,745 which would be more than five times larger than the estimated size of the UK market.

97. The measure covers an expansive variety of CT&K products and there are minimal differences between the goods subject to review and the like goods, as stated by the EC, and also the sampled PRC exporters in their questionnaire responses.
98. The sampled overseas exporters stated in their questionnaire responses that they produce goods other than CT&K in their factories, including: sagger (a type of refractory container used in the firing process of ceramics), porcelain insulators, vases, bathroom ceramics, decorations, candle stick holders, and wine bottles.
99. The different product segments (porcelain, stoneware, and earthenware) require slightly different manufacturing processes (such as different temperatures / durations in the kilns), but there are very few barriers to changing production processes to other ceramic compositions or specifications.
100. Porcelain is fired at much higher temperatures than stoneware and earthenware (roughly 1200-1450°C, as opposed to 1176-1276°C and 999-1140°C respectively)¹. The PRC mostly produces porcelain, and therefore it would likely be easier for them to turn down the temperature of their kilns and switch to producing the other bodies than it would be for producers of stoneware and/or earthenware to switch to porcelain.
101. Furthermore, there are various complexities and nuances regarding the finishes or designs of CT&K. Some designs rely on technical and complex processes that need to be done by hand, whereas others are more easily achieved in mass production. A relatively new process includes the use of ink-jet printing which is constantly improving and could replace hand-made processes in mass production. On this topic, one UK producer (Dunoon) provided evidence in its [questionnaire response](#) that PRC exporters explicitly copied the shape and designs of their products which proves how easy it is for PRC exporters to shift production based on the demands in the UK market.
102. We have available evidence and statements from PRC exporters showing that they are capable of meeting UK regulatory standards relating to “vitrified hotelware” similar to products from UK producers Steelite and Churchill (BS 4034), and food safety standards (BS 6748, BS EN 15284, BS EN 1217, and BS EN 12875-1).
103. As stated in section [F2.3 Inventories](#), it is industry standard to produce to order. As such, production processes can be altered easily and quickly according to the customers’ technical and other requirements.

¹ <https://whatahost.co.uk/blogs/what-a-host-blog/tableware-earthenware-stoneware-porcelain-bone-china-or-fine-china>



104. As stated by the EC (in its latest [expiry review](#) that quoted the “Think!Desk China Research Consulting report on Market Distortions in the Kitchen and Tableware Ceramics Industry”), in addition to the 400+ overseas exporters that registered to this case, there are tens of thousands of active producers of various sizes in the PRC which means that there are many factories that could make alterations to production processes to export goods to the UK that could compete with the like goods.
105. Due to advancements in materials science, there are continued developments of new ceramic compositions that are stronger, more heat-resistant, and less prone to chipping and therefore suitable for both domestic and commercial use.
106. Overall, we conclude that overseas exporters of CT&K in the PRC have the ability to shift production from other ceramic products to the goods subject to review, and to alter production processes of the goods subject to review to best meet demand.

F3. Assessment of incentives to export dumped goods to the UK

F3.1 Market prices in the UK and the overseas exporters’ market

107. Regarding the UK industry’s domestic sales price of the like goods, although we are aware of 22 UK producers of the like goods, we only received one questionnaire response from Churchill, and one partial questionnaire response from Dunoon.
108. All sampled PRC exporters completed questionnaire annexes that included transaction by transaction details (at Product Control Number (PCN) level) of domestic sales in the PRC in the POI.
109. This enabled us to calculate an indicative undercutting margin (as discussed in section [G4. Undercutting of the UK industry](#)) which suggests that the prices of goods subject to review provided by the PRC industry are, on average, approximately 75% cheaper than the equivalent goods sold by Churchill.
110. Therefore, if the anti-dumping measure (around 18-36%) were to no longer apply to the goods subject to review, PRC exporters would still be able to export profitably to the UK market without dumping but could still choose to dump to gain greater market share if they wanted to.
111. Further to this, based on the conclusions drawn by the European Commission (EC), as set out in [Commission Implementing Regulation \(EU\) 2019/1198](#), the TRA considered whether a particular market situation (PMS) may exist in the CT&K industry in the PRC, as outlined in this [note to file](#). We offered interested parties and contributors an opportunity to provide evidence to show this is no longer the case, however we did not receive any responses.



112. In addition to the findings from [THINK!DESK China Research & Consulting 2024, Market-Distortions in the Chinese Tableware Ceramics Industry](#), a PMS was proven in the areas of energy/electricity in previous TRA investigations, albeit for different product types. Therefore, as production of CT&K is energy intensive, even slight distortions could have a large impact on total production costs.

113. Therefore, the TRA considers that it is likely that a PMS exists in the CT&K market in the PRC. This means it is likely that PRC domestic prices are not wholly determined by market forces. However, given that the dumping margin is not being recalculated in this transition review, we did not quantify the PMS or its exact impact.

F3.2 Exports to third countries

114. As stated in section [F2.2 Production capacity and production levels](#), the PRC accounts for around 70% of the world’s overall exports of CT&K.

115. 74% of all production from the registered overseas exporters in the POI was exported (with roughly 4% being exported to the UK), which means that only 26% of all production is sold in the PRC domestic market. Therefore, exports represent a significant element of PRC CT&K producers’ business.

116. The countries that imported the highest % of CT&K from the PRC from 2020-2024 are below:

Table 4: The largest importers of CT&K from the PRC (%), and average £ / kg

1) United States of America (USA): 19.68%, £2.56 /kg	6) Russia: 3.34%, £1.90 / kg
2) United Kingdom: 4.17%, £2.40 / kg	7) France: 2.22%, £1.97 / kg
3) Germany: 3.67%, £2.13 / kg	8) Australia: 2.00%, £2.88 / kg
4) Viet-Nam: 3.48%, £4.33 / kg	9) Italy: 1.84%, £2.07 / kg
5) Netherlands: 3.35%, £2.21 / kg	10) Canada: 1.82%, £2.71 / kg

Source: [GTT](#)

117. The UK was the second largest destination for PRC exports between 2020 and 2024.

118. Various countries have imposed anti-dumping measure on CT&K from the PRC:

- Measures in force: [European Union \(2019/1198\)](#) (the UK was a member of the EU at this time), [India](#), [Brazil](#), and Colombia ([#1](#): earthenware), [#2](#): porcelain); and
- Terminated: [Türkiye](#) (terminated on 03/03/2023).

119. Overall, we assess that PRC exporters of CT&K have a history of dumping.

F3.3 Conditions in the overseas exporters’ domestic market

120. There was an absence of information from secondary sources relating to industry profit margins, demand, or other conditions in the exporters’ domestic market.



121. As discussed in section [F3.2 Exports to third countries](#), when considering data from the registered overseas exporters, only 26% of all production was sold in the PRC domestic market during the POI.
122. As stated in section [F2.4 Ability to shift production to the goods subject to review](#), in addition to the 400+ overseas exporters that registered to this case, there are tens of thousands of active producers of various sizes in the PRC. Due to the size of the market in the PRC, there is increased competition between producers which could cause PRC producers to look elsewhere to sell their products and the UK could look like an attractive destination were the measure to no longer apply to the goods subject to review.

F3.4 Attractiveness of the UK market to overseas exporters

123. As stated in section [F2.2 Production capacity and production levels](#), the size of the CT&K market in the UK is around £350m.
124. There are various UK producers of the like goods in the UK. Throughout the IP, we estimated that imports had an increasingly large market share in the UK compared to UK producers. The volume of UK demand being met mostly by imports means that the UK is in direct competition with imported like goods and the goods subject to review, leading to a competitive market where price is a key factor in purchasing decisions.
125. Prices rose over the IP which also suggests that market demand is greater than supply.
126. According to different sources of data, imports from all countries represent an increasingly large majority of the estimated size of the UK market, whereas we assess that UK producers are losing market share.
127. According to [Spherical Insights](#), the size of the UK CT&K market is anticipated to exceed \$670.5m (roughly £517m) by 2033, a CAGR of 4.63% from 2023-2033.
128. The UK was the second largest destination for PRC exports between 2020 and 2024 and is one of the biggest importers globally (fourth after the US, Germany, and France) ([GTT](#)), and the PRC has existing trade channels and presence in the UK market.



129. It is noted that, at the time of writing, and given the attractiveness of the UK market, the TRA assesses that PRC exporters may try to further exploit their ability to penetrate the UK market (even if for an indeterminate period), as a result of the high and unpredictable tariffs that the USA put in place against all imports originating in the PRC in early 2025. The uncertainty created by this situation has led to unstable international market conditions. An increased likelihood of trade deflection of CT&K originating in the PRC from the USA to the UK is expected, particularly because the UK was the second largest importer of CT&K from the PRC, following the USA, between 2020 and 2024.

F3.5 Whether overseas exporters have previously or habitually circumvented or absorbed the effects of trade remedies measures

130. On 28 November 2019, the European Commission concluded a circumvention review on CT&K from the PRC which it initiated based on its own initiative: [COMMISSION IMPLEMENTING REGULATION \(EU\) 2019/2131](#).

131. According to the European Commission (in this [blog](#)):

- It was its largest anti-circumvention investigation to date and involved very significant resources (20 investigators carrying out verification visits at 50 Chinese companies);
- The European Commission's investigation confirmed that Chinese companies were evading anti-dumping duties of around 36% by channelling their CT&K exports through other companies that were subject to lower anti-dumping duties of around 18%;
- The Chinese companies - more than 30 in total - found to have helped to circumvent the duties were, as a result, also subjected to the higher duty rate of around 36%; and
- The new duties were applied from 21 March 2019 onwards, with some €15 million in duties to be collected retroactively.

132. The European Commission then strengthened the import requirements and monitoring, reducing the likelihood of further circumvention activities.

133. On 03 August 2021, the investigating authority in India ([Directorate General Of Trade Remedies](#)), also concluded an anti-circumvention investigation regarding CT&K from China: [Case No.-AD-AC-05/2020](#). A producer of CT&K in China exported the goods to Malaysia, and the exporter from Malaysia re-exported them to India.



134. Also, as shown in Figure 1, PRC exports of CT&K to the UK dropped slightly after the measure came in, but then continued to grow and stay at high volumes. As discussed in section [F3.1 Market prices in the UK and the overseas exporters' market](#), prices of CT&K from the PRC are, on average, approximately 75% cheaper than the equivalent goods sold by Churchill. Therefore, they could be absorbing the effects of the measure.
135. In summary, other investigating authorities have found that PRC exporters have circumvented anti-dumping measures, and evidence suggests that they could also be absorbing the effects of the UK measure. This speaks to their behaviour, and possibility for future circumvention of duties from other countries, including the UK.

F4. Conclusion on dumping likelihood

136. Overall, we have concluded that PRC exporters have both the ability and incentives to export the goods subject to review at dumped prices to the UK.
137. Therefore, we conclude that, on the balance of probabilities, dumping of the goods subject to review from the PRC would be likely to continue in increased volumes if the anti-dumping measure under review were no longer applied to those goods.



Section G: Likelihood of injury assessment

G1. Introduction

138. In accordance with regulation 99A(1)(b) of the Regulations, we have considered whether injury to the UK industry in the like goods would be likely to continue or recur if the anti-dumping amounts were no longer applied to imports of goods subject to review from the PRC.

139. Where primary data was not available, information obtained from secondary sources was used in accordance with the Regulations.

140. To conduct the injury likelihood assessment, we considered:

- Current state of the UK industry;
- Other injury factors;
- Undercutting of the UK industry;
- Domestic and International market conditions; and
- Historic injury data.

141. 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.

142. There were high levels of imports of goods subject to review from the PRC during the IP. The following analysis has been conducted in the context of a UK market that was being protected by the measure across the IP. We have analysed the injury factors during this time and consider what would likely happen were the measure to be revoked.

G2. Current state of the UK industry

143. We only received a full producer questionnaire response from Churchill which we were able to verify. We received a limited submission from Dunoon, including a partial producer annex, which we were not able to verify. Unless otherwise stated, our assessment of the current state of the UK industry is based on the combined submissions of these two producers, referred to as the 'participating UK producers', as stated in section [E1. UK industry](#).

144. During our assessment of the UK industry, the TRA noted that the first 12-month period of the injury period was heavily affected by the COVID-19 pandemic and its after-effects. These effects are discussed in section [G3.1 COVID-19](#).



145. Because COVID-19 contributed to distorted figures during that year, we have indexed UK industry figures to 2021-22 to more clearly highlight the trends over the IP.

146. We assessed the following injury indicators:

- actual and potential decline in sales, profits, output, market share, productivity, return on investments or utilisation of capacity;
- factors affecting domestic prices of the like goods;
- the magnitude of the margin of dumping; and
- actual and potential negative effects on cash flow, inventories, employment, wages, growth, the ability to raise capital or investments

G2.1 Actual and potential decline in sales

147. Participating UK producers' sales of like goods within the UK increased over the injury period.

Table 5: UK Sales of like goods (by value)

	2020-21	2021-22	2022-23	2023-24
UK industry (Indexed from 2021-22)	32	100	106	111

Source: [Churchill](#) and [Dunoon](#) questionnaire annexes.

148. Sales towards the beginning of the period were almost certainly adversely affected by COVID-19 as discussed [below](#), with the increase in sales between 2020-21 and 2021-22 representing a recovery. Since then, sales have increased consistently, with figures for 2023-24 being 11% higher than those in 2021-22.

149. During this time, both output and inventories also increased, which suggests healthy production, and profits figures improved, which supports indications of healthy sales activity.

G2.2 Actual and potential decline in outputs

150. Dunoon did not provide output data for the injury period.

151. Churchill's output data was based on units (including items of various weights and values) rather than by net mass (kg) and covered total company output of like goods, not just those destined to be sold in the UK.

Table 6: UK output of like goods

	2020-21	2021-22	2022-23	2023-24
Churchill (Indexed from 2021-22)	50	100	103	103

Source: [Churchill](#) questionnaire annex.



152. Output towards the beginning of the period was almost certainly adversely affected by COVID-19 as discussed [below](#), with the increase in output between 2020-21 and 2021-22 representing a recovery. Since then, output has remained constant, with figures for 2023-24 being 3% higher than those in 2021-22.

G2.3 Actual and potential decline in profits

153. Participating UK producers' profit and profit margins for the like goods sold in the UK increased over the injury period.

Table 7: UK industry Net Operating Profits after Tax (UK sales of the like goods only)

	2020-21	2021-22	2022-23	2023-24
<i>Participating UK producers (Indexed from 2021-22)</i>	-29	100	99	107

Source: [Churchill](#) and [Dunoon](#) questionnaire annexes.

154. Profits towards the beginning of the period were almost certainly adversely affected by COVID-19 as discussed [below](#), with the increase in all measures of profit between 2020-21 and 2021-22 representing a recovery. Since then, overall profit for domestic sales of like goods has increased slightly.

G2.4 Actual and potential decline in market share

155. The TRA received no estimations of market share from participating UK producers. Estimates of the size of the industry were provided by CUK but this was not verified or applied to the POI. We have not been able to assess this factor.

G2.5 Actual and potential decline in productivity

156. We assessed productivity as output of like goods as discussed above divided by number of staff involved in the manufacture of like goods.

157. Churchill provided us with output figures by unit but were not able to distinguish between output destined to be sold in the UK and goods for export. It also did not separate manufacturing from administrative staff.

158. Dunoon did not provide output figures, but we were able to estimate productivity using UK sales figures for the like goods on the basis that it keeps almost no finished stock.

Table 8: UK industry productivity: Indexed to 2021-22

	2020-21	2021-22	2022-23	2023-24
<i>Churchill units per employee (indexed to 2021-22)</i>	46	100	81	78
<i>Dunoon kg per manufacturing staff (indexed to 2021-22)</i>	74	100	90	83

Source: [Churchill](#) and [Dunoon](#) questionnaire annexes.



159. Productivity figures above show an increase in productivity between 2020-21 and 2021-22, followed by a decline of between 17% (Dunoon) and 22% (Churchill) over the next two years.
160. Productivity figures towards the beginning of the period were almost certainly adversely affected by COVID-19 as discussed [below](#), with the increase between 2020-21 and 2021-22 representing a recovery. Since then productivity has decreased, as demonstrated by figures indexed to 2021-22.
161. If we assume that 2020-21 figures are anomalous for the reason above, this data suggests a declining trend in productivity from 2021-22.

G2.6 Actual and potential decline in return on investment

162. The TRA did not receive return on investment figures from the participating UK producers in a format we could use. We have not been able to assess this factor.

G2.7 Actual and potential decline in utilisation of capacity

163. The TRA did not receive capacity or utilisation of capacity figures from the participating UK producers in a format we could use. We have not been able to assess this factor.

G2.8 Factors affecting the domestic price of the like goods

164. The TRA did not receive cost information from participating UK producers. We have not been able to assess this factor.

G2.9 The magnitude of the margin of dumping

165. As explained at [paragraph 20](#), we did not recalculate margins in this transition review.
166. Our analysis in [Section F](#) above identified that exports from the PRC were entering the UK market at dumped prices during the POI. We also identified that the historic volume of imports of CT&K from the PRC appears to have been largely unaffected by the imposition of the measure in 2013.
167. Our analysis in [G4. Undercutting of the UK industry below](#) identified that the export prices of goods subject to review are lower than those of participating UK producers.
168. We assess that it is likely that the current measure provides the UK industry with a degree of protection from the effect of imports of goods subject to review sold at dumped prices. We assess that these effects would be even more pronounced if the measure were to no longer be applied to the goods subject to review.
169. We assess that this factor suggests that the domestic industry would be vulnerable to a likelihood of injury recurring.



G2.10 Actual and potential negative effects on cash flow

170. Dunoon did not provide information on cash flow.

171. Churchill's cash holdings at the end of each period increased between 2020-21 and 2021-22 and then declined over the remainder of the injury period.

Table 9: Churchill cash holdings

	2020-21	2021-22	2022-23	2023-24
<i>Churchill Index 2021-22 = 100</i>	66	100	76	57

Source: [Churchill](#) questionnaire annex.

172. Cash flow towards the beginning of the period were almost certainly adversely affected by COVID-19 as discussed [below](#), with the increase between 2020-21 and 2021-22 representing a recovery. Since then, Churchill's cash position declined 43%, below the figure for the end of 2021-22.

G2.11 Actual and potential negatives effect on inventories

173. Stocks of manufactured like goods declined between 2020-21 and 2021-22 and then increased steadily through to 2023-24.

Table 10: Stocks of UK manufactured like goods at end of period (by value)

	2020-21	2021-22	2022-23	2023-24
<i>Participating UK producers Index: 2021-22 = 100</i>	140	100	155	230

Source: [Churchill](#) and [Dunoon](#) questionnaire annexes.

174. Inventories towards the beginning of the period were almost certainly adversely affected by COVID-19 as discussed below.

175. The UK industry's ability to produce and distribute like goods was disrupted during and following the pandemic, with demand for goods recovering more quickly than industry output. This resulted in a decrease in inventories as the industry fulfilled demand from stock, and then an increase in inventories as demand corrected to pre-pandemic levels.

176. Overall, the changes in stock value, combined with positive indicators of outputs, sales and profits, suggest an industry adjusting to the return to normality following the disruption of COVID-19.

G2.12 Actual and potential negative effects on employment

177. There was a slight dip in the total number of employees from the participating UK producers between 2020-21 and 2021-22 followed by a steady increase for the next 24 months.



Table 11: Numbers of employees

	2020-21	2021-22	2022-23	2023-24
<i>Participating UK producers: Index 2021-22 = 100</i>	108	100	125	130

Source: [Churchill](#) and [Dunoon](#) questionnaire annexes.

178. Employee numbers towards the beginning of the period were almost certainly adversely affected by COVID-19 as discussed below, with the decrease between 2020-21 and 2021-22 likely reflecting staff leaving at the end of the Coronavirus Job Retention Scheme (furlough) in September 2021. Since then, staff numbers have increased steadily.

G2.13 Actual and potential negative effects on wages

179. Churchill did not provide information on wages.

Table 12: Dunoon’s median wage

	2020-21	2021-22	2022-23	2023-24
<i>Dunoon: Index 2021-22 = 100</i>	93	100	105	111

Source: [Dunoon](#) questionnaire annex.

180. Dunoon’s median wage increased constantly over the injury period, an average of 6.3% per year at a time when the UK’s inflation fluctuated between 0.2% in August 2020 and 11.1% in October 2022.

G2.14 Actual and potential negative effects on growth

181. We assessed the UK industry’s growth using the domestic sales of UK-produced like goods as discussed in [G2.1](#) above.

182. Sales towards the beginning of the period were almost certainly adversely affected by COVID-19 as discussed in the COVID-19 section below, with the increase in sales between 2020-21 and 2021-22 representing a recovery. Since then, sales have increased consistently, with figures for 2023-24 being 11% higher than those in 2021-22. The UK industry sales of like goods within the UK showed an increasing trend over the injury period.

183. During this time, both output and inventories increased which suggests healthy production and profits figures improved, which supports indications of growth.

G2.15 Actual and potential negative effects on the ability to raise capital or investments

184. The TRA did not receive sufficient information to assess this factor.



G2.16 Conclusions on the state of the UK industry

185. We note that 3 of the 15 factors assessed (productivity, magnitude of dumping, and cash flow) indicated that the participating UK producers would be vulnerable to a likelihood of injury recurring. We assess that none of these were strong positive indicators.
186. We note that 5 of the 15 factors assessed (market share, return on investment, utilisation of capacity, factors affecting domestic price of the like goods, and the ability to raise capital or investments) neither indicated nor contradicted that the participating UK producers would be vulnerable to a likelihood of injury recurring.
187. We note that 7 of the 15 factors assessed (sales, outputs, profits, growth, inventory, employment, and wages) indicate that the participating UK producers were in a strong position and not vulnerable to a likelihood of injury recurring.
188. As such, whilst we assess that the limited evidence provided to us suggests that the participating UK producers are in relatively good health and are not in a vulnerable position, we acknowledge that:
- this assessment is based on the incomplete data of only two producers who collectively represent less than a third of the sales value of producers who originally registered onto this transition review, and an even smaller proportion of the UK industry made up of all the producers in the UK of like goods;
 - the injury period started during disruption of the COVID-19 pandemic, and negative distortions are visible in almost every dataset. Whilst we have attempted to isolate these distortions, we accept that figures indicating industry health may well be indistinguishable from those indicating recovery from a specific, limited but substantial external distortion; and
 - the current state of the UK industry is predicated on the stability of twelve years of the measure being in force on more than 60% of all UK imports of CT&K. We are unable to quantify the value of this stability to the UK industry, so cannot predict the effect that removing this measure would have.

G3. Other causes of injury

G3.1 COVID-19

189. We assess that the COVID-19 pandemic was a considerable disruptive event for a limited, well-defined period of time.
190. We note that the industry appeared to recover from the worst of the disruptions over the injury period and that the UK has had no substantive COVID-19 restrictions since March 2021.



191. Considering that the UK industry in the like goods appears to have recovered from the negative effects of the COVID-19 pandemic, we do not assess this to be an independent source of vulnerability and injury for that UK industry.

G3.2 Wholesale fuel costs

192. We assess that ceramics manufacture is energy intensive and that producers are sensitive to changes in fuel prices.

193. We assess that wholesale gas prices spiked between 2021 and 2023, likely as a result of economies opening back up again after COVID-19-related lockdowns, and then also the conflict between Russia and Ukraine. The black line in Figure 2 (below) indicates when Russia invaded Ukraine on 24 February 2022.

Figure 2: UK gas prices



Source: Publicly available table from [Trading Economics](#), extracted May 2025. This image is based on gas futures pricing, which differs slightly to the forward contract wholesale gas data published by [Ofgem](#). We used Trading Economics data for broader context as Ofgem's published dataset only goes back to 2021. Injury period indicated in red.

194. We note that wholesale gas prices stabilised in early 2023 and have remained at a level higher than the pre-war average.

195. We assess that the dramatic increase in fuel prices was a considerable disruptive event for a limited, well-defined time period.



196. We assess that the long-term impact of increased fuel prices could make the UK industry increasingly vulnerable to undercutting in the future, especially from countries with access to cheaper energy than the UK.
197. However, we do not assess that the degree or rate of increase in energy prices has been so great as to be an independent source of injury. Any vulnerability to a recurrence of injury based on an increase in the importation of dumped goods is unlikely to be linked to energy costs.

G3.3 Imports from third countries

198. According to HMRC import data, the PRC industry accounted for about 62% of volume (39% of value) of UK imports into the UK during the injury period.

Table 13: Imports of CT&K over the injury period

Country	Value (£)	%	Volume (kg)	%	Average £ / kg
PRC	£587,587,232	39%	281,008,240	62%	£ 2.09
Portugal	£53,771,790	4%	20,656,440	5%	£ 2.60
United States	£128,904,983	9%	17,611,752	4%	£ 7.32
Netherlands	£111,609,907	7%	17,283,288	4%	£ 6.46
Thailand	£35,220,613	2%	11,110,482	2%	£ 3.17
Türkiye	£32,204,574	2%	11,083,378	2%	£ 2.91
Ireland	£36,575,722	2%	11,047,882	2%	£ 3.31
Germany	£69,224,588	5%	9,484,587	2%	£ 7.30
South Korea	£80,637,512	5%	8,721,396	2%	£ 9.25
France	£53,032,025	4%	5,762,402	1%	£ 9.20

Source: HMRC Overseas Trade in Goods Statistics (OTS)

199. The next nine largest exporters by volume, combined, represent only 24% of volume (40% of value) of UK imports of like goods, with the second largest exporter, Portugal, representing only 5% of export volume to the UK.
200. Average prices of imported CT&K from the PRC are lower (and in some cases, much lower) than the average prices of imports of CT&K from third countries. Furthermore, the volume of imports from third countries is much lower than the volume of imported CT&K from the PRC.
201. As a result, we assess that imports from third countries are not an independent source of injury. Any vulnerability to a recurrence of injury based on an increase in the importation of dumped goods subject to review is unlikely to be linked to third country imports.



G3.4 Conclusions on other causes of injury

202. We have considered the effects of COVID-19, wholesale fuel costs, and imports from third countries. Whilst each of these have caused or have the potential to cause disruption to the UK industry, we do not assess that any of these factors represent independent sources of injury.

G4. Undercutting of the UK industry

203. According to regulation 2 of the Regulations, price undercutting occurs when the price of the goods subject to review is lower than the price of the like goods in the UK. In the event of undercutting, the UK industry may be forced to reduce its prices to compete against lower priced imports 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.

204. The TRA did not receive adequate data from the UK industry to allow a true price comparison to be made. We therefore resolved to construct indicative domestic prices from the facts available. We used two separate methods to reflect deficiencies in the source submissions.

G4.1 Churchill - indicative prices by PCN

205. Churchill was not able to provide sales volumes, outputs in kg or transaction level data by PCN. This meant that we were not able to calculate prices for its output by phenotype during the POI.

206. To construct indicative prices for the purposes of this assessment, the TRA selected transactions for what we deemed to be six typical goods from Churchill domestic sales during the POI and manually assigned them to PCNs. We then compared these to the PCN level data provided to us by the PRC industry. This methodology could not be applied to Dunoon's data as it did not provide us with transaction level data.

207. This comparison indicates that the prices of these six PRC goods were on average 75% cheaper than the equivalent goods sold by Churchill.

G4.2 Dunoon - Indicative prices for the IP (import and sales volume)

208. Dunoon were able to provide overall sales value and volume figures for domestic sales of domestically produced like goods. This allowed the TRA to construct a domestic selling price per kg over the IP.

209. We compared these figures to HMRC import figures for the top 10 exporting markets to the UK, which includes the PRC. Dunoon's figures are confidential, but its indicative prices were at least twice those of any of the other figures considered for the IP (as



detailed in Table 13 above). Moreover, the PRC’s prices were the lowest of the top 10 importers prices over the IP.

G4.3 Conclusions on undercutting

210. We acknowledge that Churchill and Dunoon are both producers of premium products and that the PRC industry has indicated leans towards the generic / consumer share of the market. This said, the magnitude of the difference in prices indicated by the limited facts available, combined with the low price of imports from the PRC compared to the next nine exporting markets of like goods to the UK, strongly indicates that undercutting of the UK industry happened during the IP and would likely to continue to a greater degree were the measure on goods subject to review to no longer be applied.

G5. Assessment of domestic and international market conditions

211. 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 if the anti-dumping measure no longer applied to the goods subject to review.

G5.1 Domestic market conditions

212. Figures provided by CUK in their [questionnaire response](#) places the value of the UK market as £350,000,000 annually. This is similar to estimates provided by Zion Market Research and Spherical Insights amounting to \$408.9m in 2022 (roughly £338m) and \$426.5m in 2023 (roughly £335m) respectively.

213. HMRC import figures at 8-digit (which will include some out of scope goods) suggest similar figures over the IP.

Table 14: Imports by 8-digit commodity code: All exporting countries

	2020-21	2021-22	2022-23	2023-24
By value	£297,267,193	£401,167,352	£430,579,190	£385,341,739
<i>Index 2021-22 = 100</i>	74	100	107	96
By volume (kg)	108,480,350	127,357,281	107,359,344	107,394,731
<i>Index 2021-22 = 100</i>	85	100	84	84
Price per kg	£2.74	£3.15	£4.01	£3.59
<i>Index 2021-22 = 100</i>	87	100	127	114

Source: HMRC Overseas Trade in Goods Statistics (OTS)

214. These two datasets are not directly comparable but do strongly suggest that the majority of the UK CT&K market is sourced via imports. Sales value figures provided by participating UK producers equate to less than 10% of the value of imports during the IP.



215. Imports towards the beginning of the period were almost certainly adversely affected by the COVID-19 pandemic and the blockage of the Suez Canal in March 2021. The recovery from these events can be demonstrated by the increase in import value and volume between 2020-21 and 2021-22. This manifested in an increase in average price per kg of imports up until 2022-23 with a slight correction during the POI, with prices at the end of the IP 14% higher than in 2021-22. This increasing trend indicates that supply was not able to meet demand towards the end of the IP.

Table 15: UK industry sales value (indexed to 2021-22)

	2020-21	2021-22	2022-23	2023-24
Churchill UK sales value	29	100	105	109
Dunoon UK sales value	63	100	114	126
Dunoon UK sales volume	66	100	116	87
Dunoon average price per kg	96	100	98	144

Source: [Churchill](#) and [Dunoon](#) questionnaire annexes.

216. These show that the participating UK producers' sales values increased across the IP, likely reflecting a recovery from the COVID-19 pandemic.

217. Churchill could not provide sales volume in kg. Dunoon's sales volume increased until 2022-23, before declining during the POI. These result in a relative increase in the price per kg which supports an argument that that demand was outpacing supply.

G5.1.1 Interchangeability / competition with goods beyond scope

218. We assessed tableware and kitchenware of other materials as functional alternatives ceramic goods. We assessed that there are enough practical and aesthetic differences between ceramic and non-ceramic tableware and kitchenware that the two groups of goods are not always functionally interchangeable. When they are, the choice between ceramic and non-ceramic tableware and kitchenware is driven by customer preference. We do not assess that competition from non-ceramic tableware and kitchenware would have a meaningful effect on the assessment of the likelihood of injury to the UK industry were dumping of the goods subject to review continue in increased volumes.

G5.1.2 Historical context to the UK market

219. We assess that the UK ceramics industry has declined considerably over the 20th and 21st century, likely as a result of the availability of cheaper imports. This is discussed in more detail in [G6 – Historic injury data](#) below.

220. Both of the participating UK producers indicated that they specialise in specialist and premium products. Our understanding of the broader UK industry is that many remaining CT&K manufacturers focus on the premium market.



221. We assess that the majority of generic / consumer goods are now produced overseas, and much of the remaining UK industry now services the specialist or premium goods market.

G5.1.3 Consumer preferences

222. We assess that the nature of ceramic tableware in particular contributes to its periodic replacement. This makes ceramic tableware particularly sensitive to changes in consumer preferences for functional and aesthetic differences.

223. We assess that there are many factors that ultimately cause a consumer to purchase one good over another, these are nearly impossible to account for, although our understanding of the broader UK industry is that these various factors are almost always leveraged directly against price.

G5.2 International market conditions

224. The TRA assessed international supply and demand figures drawn from [GTT](#) in calendar years.

225. Between 2020 and 2024 more than 14.1 megatonnes (14,100,000,000 kg) were exported globally at a value off £42.2 billion.

226. Of this the PRC was the largest global exporter, exporting 74% of volume and 66% of value of global exports. For context, the second biggest global exporter (by volume) was Portugal, who during the same period was responsible for 4% of volume and 3% of value of global exports.

Table 16: Global average export price

	2020	2021	2022	2023	2024
Global average export price per kg (including PRC)	£2.82	£2.68	£3.44	£3.22	£2.77
PRC average export price per kg	£2.58	£2.52	£3.20	£2.82	£2.33

Source: [GTT](#)

227. These prices show a similar fluctuation to the data examined above for the UK imports: an increase in the middle of the period before a correction towards the end. This may reflect disruption caused by COVID-19 restrictions within the PRC which persisted into 2023. Despite this, the overall trend over the period for both sets of figures are fairly consistent, suggesting that supply was generally keeping up with demand.



G5.2.1 PRC exports to third countries

228. As the PRC accounted for 74% of global trade volume between 2020 and 2024 and was the origin of 62% of import volume of goods into the UK during the injury period, we have focused on exports from the PRC.

Table 17: Exports from the PRC (by volume in tonnes)

	2020	2021	2022	2023	2024	%
United States	360,949	492,577	423,569	368,445	407,658	18.8%
United Kingdom	84,050	99,226	79,681	77,561	94,898	3.7%
Germany	68,471	85,885	83,702	63,276	81,510	2.9%
Viet-Nam	68,929	55,194	72,966	76,511	90,009	5.6%
Netherlands	53,374	73,893	71,272	64,060	86,795	2.8%
Russian Federation	50,999	74,352	51,078	81,253	90,389	2.4%

Source: [GTT](#). % indicates percentage of total PRC exports of CT&K over the five year period.

Table 18: Exports from the PRC (by value in million £)

	2020	2021	2022	2023	2024	%
United States	£842.1	£1,220.4	£1,298.0	£983.7	£918.7	19.7%
United Kingdom	£185.8	£230.4	£231.2	£191.6	£206.1	4.2%
Germany	£147.4	£173.4	£198.7	£139.4	£158.0	3.7%
Viet-Nam	£267.1	£245.5	£460.8	£411.7	£190.6	3.5%
Netherlands	£116.1	£161.6	£179.7	£150.0	£164.6	3.3%
Russian Federation	£113.1	£125.5	£107.4	£155.2	£160.3	3.3%

Source: [GTT](#). % indicates percentage of total PRC exports of CT&K over the five year period.

229. These figures demonstrate that the UK is the second biggest export market for the PRC industry, both by value and volume after the United States.

230. As discussed in section [F3.4 Attractiveness of the UK market to overseas exporters](#), the TRA assesses that PRC exporters may try to further exploit their ability to penetrate the UK market (even if for an indeterminate period), as a result of the high and unpredictable tariffs that the USA put in place against all imports originating in the PRC in early 2025. The uncertainty created by this situation has led to unstable international market conditions. This may result in increased levels of PRC dumped goods being imported into the UK, further impacting the UK industry.

231. As well as being recipients of goods originating in the PRC, the United States, the Netherlands and Germany are also sizable exporters to the UK (as discussed in section [G3.3 Imports from third countries](#), above). [GTT](#) data suggests that the UK also exports considerable volumes of like goods to the United States, Netherlands and Germany. The qualitative differences between these goods is not available in our current dataset, but indicate that the trade in CT&K is nuanced and complex, with



different industries appearing to produce specialist goods for export whilst still importing large volumes of goods from elsewhere. This mirrors our more detailed evidence from the UK, which imports the majority of its CT&K goods but still retains a number of specialist products that appear to have reasonable success in the export market.

G5.3 Conclusions on domestic and international market conditions

232. We assess that the global market for CT&K is dominated by the PRC industry, which was responsible for approximately 74% of global trade volume between 2020-2024.
233. We assess that the UK is the second largest export market after the United States and was the recipient of 4.2% of PRC industry exports between 2020-24.
234. We assess that there is a chance that the ongoing trade conflict between the PRC and the USA could result in increased trade deflection of goods subject to review to the UK.
235. We assess that rising prices of global exports to the UK indicate that demand was strong towards the end of the IP.
236. We assess that the stability of export prices from the PRC indicate that PRC supply is keeping up with global demand.
237. We assess that there are alternative goods to CT&K, but that these are sufficiently different that they would not meaningfully affect the trade in goods subject to review or like goods.
238. We assess that the trade in CT&K is complex and nuanced, with evidence suggesting that several countries (including the UK) are exporters as well as importers of goods.
239. We assess that the UK CT&K industry has been declining since the middle of the 20th century and surviving producers are increasingly specialised.
240. We assess that consumers make decisions for a variety of reasons, but that price is a key factor in consumer choice.
241. Collectively we assess these findings support an environment which would be likely to contribute to a likelihood of recurrence of injury to the UK industry in the like goods if the anti-dumping measure under review no longer applied to the goods subject to review



G6. Historic injury data

242. The TRA considered whether the UK industry suffered injury in the past as a result of dumped imports of CT&K originating in the PRC.
243. In its questionnaire response, CUK indicated that the number of employees associated with its members decreased from around 8,500 in 2003 to around 3500 in 2023, driven by closures and downsizing of production.
244. Information obtained from secondary sources indicates that several well-established UK producers have ceased production in their own right since the introduction of the measure in 2013. These include:
- **Spode** (est. 1770): went into administration in 2008 and its brand was acquired by Portmeirion;
 - **Royal Worcester** (est. 1751): went into administration in 2008 and its brand was acquired by Portmeirion;
 - **Dudson** (est. 1800): went into administration in 2019 and its brand was acquired by Churchill China;
 - **Royal Stafford** (est. 1894): ceased trading in 2025; and
 - **Moorcroft** (est. 1913): ceased trading in 2025
245. Dunoon submitted a qualitative response regarding historic injury where it stated that it closed its Scotland factory in January 2005 as its domestic sales had dropped by 40%. This resulted in more than 50 staff being made redundant and the company concentrating its remaining production in Staffordshire. Dunoon indicate that the decline in sales was related to the import of cheaper goods from the PRC.
246. We have not been able to establish that the decline of the UK industry since the imposition of the measure 2013 was a result of the importation of dumped goods subject to review.
247. This said, the evidence of reduction of industry staff, the closure of a number of a number of longstanding producers and evidence of Dunoon's factory closure suggest an industry struggling to compete with external trading pressures and continuing to lose market share.



G7. Conclusion on injury

248. We assessed the state of the UK industry in the context of the 15 injury factors detailed in regulation 33 of the Regulations.
249. We assessed that the limited data we received from the participating UK producers does not indicate that they are in a vulnerable position, however we acknowledge that:
- the participating UK producers represent a small fraction of the UK industry;
 - the trend over the injury period may represent a recovery from COVID-19; and
 - the current state of the UK industry is influenced by the stability provided by the existing measures.
250. The factors analysed suggest that the participating UK producers may have been recovering from the disruption caused by the COVID-19 pandemic and the subsequent return to normal trading.
251. As well as the effects of COVID-19, we also assessed the increase in the cost of wholesale fuel due to economies opening back up again after COVID-19-related lockdowns and then Russia's invasion of Ukraine in 2022, and the broader context of third country imports to consider whether there were any other factors that could contribute to injury of the UK industry.
252. We assessed that whilst COVID-19 and wholesale costs were disruptive, their effect were temporally limited and were not so substantial that they would constitute an independent source of injury.
253. We assessed that undercutting is happening now with the measure in place and would be likely to continue to a greater degree were the measure on the goods subject to review to no longer be applied.
254. We assessed that the global market in CT&K is substantial and is dominated by exports from the PRC. We assessed that the UK was the PRC's second biggest export market and that demand for goods were likely increasing.
255. We assessed that there are few practical alternatives to CT&K and that CT&K in the UK is widely available and relatively inexpensive.
256. We assessed that the UK industry has been in decline for several decades and that the remaining manufacturers are increasingly high-end and specialised.
257. We assessed that the primary risk to these high-end specialised goods is the availability of considerably cheaper alternatives.



258. We assessed that the measure, as applied since 2013, has not arrested the decline of the UK industry, nor has it had a noticeable effect in the growth in the PRC industry.
259. We assess that collectively these factors create an environment which would be likely to contribute to a recurrence of injury to the UK industry in the like goods if the anti-dumping measure under review no longer applied to the goods subject to review.
260. We have not been able to assess whether the UK has suffered historical injury as a result of dumped imports of CT&K from the PRC. However, we assess that the reduction in staff across the industry and the closure of a number of plants is suggestive of an industry struggling to maintain market share in the light of increased competition from overseas exporters.
261. Pursuant to regulation 99A(1)(b) of the Regulations, the TRA must consider 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
262. Despite the apparent robustness of the participating UK producers, in the light of the scale and prices of the PRC industry imports, we assess that it is likely, on the balance of probabilities, that the UK industry in the like goods would suffer a recurrence of injury were the anti-dumping measure on the goods subject to review to no longer be applied.



Section H: Economic Interest Test

H1. Introduction

263. Pursuant to regulation 100(1E) of the Regulations, the TRA must advise the Secretary of State whether and why it consider that varying the anti-dumping amount in accordance with our intended final recommendation would meet the EIT. The aim of the EIT is to determine whether making a recommendation to vary the measure on the goods subject to review imported from the PRC is in the economic interest of the UK.
264. In accordance with paragraph 25 of Schedule 4 to the Taxation 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. The EIT is presumed to be met unless we are satisfied that the application of the remedy is not in the economic interest of the UK.
265. In line with paragraph 25(4) of Schedule 4 to the Taxation Act, we have taken account of the following factors in conducting the EIT:
- the injury caused by the dumping of goods subject to review to the UK industry in 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.

H1.1 Evidence base

266. In addition to the evidence submitted as set out in section [C2. Participation in the review](#), we also conducted a [survey for upstream and downstream businesses](#) and consumers. Once we had conducted checks to remove ineligible responses, the remaining responses were from:
- 1 upstream producer; and
 - 4 downstream businesses.



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

271. We have identified the following groups as potentially being affected by the proposed measure:

- **Upstream businesses:** primarily producers of raw materials for the production of CT&K;
- **UK producers** of CT&K; and
- **Importers and downstream** of CT&K.

272. There is some overlap between the groups. For example, one of our sampled producers is also an importer. Therefore, in order to avoid double counting, we have classified each business as falling into one of these groups based on our understanding of their primary business activity.

273. We have identified businesses in each of these groups and looked at a selection of them because it was not feasible to fully investigate all known businesses given case time constraints. For each selected business, we looked at the four most recent published accounts.

H4.1 Upstream businesses

274. Churchill China was the only producer that provided a submission with a clear profile of their business, and from there, we identified three upstream business, two of which are critical to their business. All the upstream businesses have company account filings from which we were able to extract more specific information.

275. From the selected upstream businesses, we identified one that directly supplies physical materials to Churchill China for production. This business directly supplies a significant proportion of their product to producers, making this business an important business to Churchill. We examined the cost of the raw materials used by the producer in relation to the total turnover of the supplier and found that these raw materials were very important in the production of CT&K.

276. From the three businesses, after an inspection of the most recent published accounts, it can be identified that around 3,700 staff are employed between them. All the upstream businesses published full accounts. Their combined annual turnover was approximately £6bn. Average EBITDA margin for selected businesses was 3.4%, and the companies generally have stable growth with healthy operating profits. These companies overall may not be subject to significant market changes, and they do not seem likely to be particularly vulnerable to economic shocks.



H4.2 UK producers

277. Through research and submitted evidence, we have identified 20+ UK producers of CT&K. When comparing the sales of CT&K to total turnover, it appears that this product is an important product to the participating UK producers.
278. We sampled six UK producers from the 20+ identified based on the two UK producers that submitted a questionnaire response, and the four UK producers with the largest turnover.
279. From recent accounts, the average turnover from our six selected producers was approximately £40m and their average GVA was approximately £19m. The average EBITDA margin was 10.8%. We found that CT&K constitutes a significant portion of their turnover, so it is likely to be very important to these businesses. We found that these businesses are likely to have medium vulnerability to shocks. Although they exhibit stable growth with healthy operating profits, there remains a fairly significant dependence on CT&K.

H4.3 Importers and retailers

280. From evidence submitted and our own research, we are aware of around 2,176 businesses that may import and/or sell CT&K in the UK. The majority of these are small businesses, for example, high street shops and online retailers. These businesses import under the five 8-digit codes of which 139 are likely to be Non-Established Taxable Person (NETPs). We have selected a sample of four importers, three of which are small businesses, and one large business (Nisbets).
281. The four businesses have a total of over 2,000 employees, of which Nisbets makes up 97% of the total number. Nisbets submitted a pre-sampling questionnaire indicating that tableware and kitchenware is important to their business.
282. According to the four most recently published accounts, the four selected businesses had a combined annual turnover of £438m. It was not possible to calculate the GVA for the three smaller businesses as they submitted partial or abbreviated company accounts, however, Nisbets has a GVA of £170m. Of the three remaining smaller businesses, the total turnover is approximately £10m, and their significance of CT&K to their business ranges from somewhat important to very important.



H4.4 Consumers

283. CT&K are predominantly a consumer good. Virtually every UK household will own some form of CT&K. A UK market report by Mintel highlights that 73% of UK consumers bought a piece of CT&K in the last 12 months in 2022 ([UK Tableware and Cookware Market Report 2022](#)).
284. We received 15 survey responses from consumers. Given the number of responses, there are limitations to the strength of conclusions we can draw from the survey. From the responses we can analyse in part, when asked about a hypothetical rise in price of CT&K by 5%, overall, the respondents indicated that they would purchase the product regardless as opposed to buying it at a cheaper price. Most respondents would prefer to purchase porcelain and stoneware as opposed to bone China and respondents were generally open to the idea of paying more for the same good if the price increased.
285. These responses, although limited, showed that there may be evidence of brand loyalty from those who purchase products at the higher end of the market. A rise in the price in a more expensive product did not sway consumers to choose cheaper products.
286. Table 19 summarises the economic significance metrics for the affected industries. It shows CT&K are at least somewhat important to all groups. Producers and importers are more economically significant than upstream businesses. All affected groups have healthy or high average profit margins (EBITDA), however, an important point to note is that a particular EBITDA figure for a specific segment (i.e. a producer) that is deemed to be 'healthy', the same figure may not be deemed healthy for another segment (i.e. an importer).



Table 19: Significance metrics for affected industries

Example significance table for affected industries from CT&K review				
	Upstream businesses	UK Producers	Importers	Downstream businesses
Total known businesses	400	20+	2,176	3,000
Total selected	3	6	4	7
Estimated importance of CT&K for this group	Somewhat important <i>(UK producer raw materials cost/upstream business turnover)</i>	Very important <i>(revenue from CT&K/producer turnover)</i>	Very important <i>(revenue from CT&K/importer turnover)</i>	Somewhat Important <i>(UK sales of CT&K/downstream business turnover)</i>
Total employment for selected businesses	3,323	2,258	1,957	11,074
Total GVA for selected businesses	204m	92m	103m	489m
Total turnover for selected businesses	6,052m	199m	427m	1,464m
Average EBITDA margin for selected businesses	38.7%	9.2%	7.7%	17.9%
Vulnerability to negative economic impacts	Low - strong profits and high turnover	Medium - stable growth with healthy operating profits	Medium - stable growth with healthy operating profits	Low - strong profits and high turnover and operating profits

NB. *Data was only available for one of the four selected importers for the above metrics.

Sources: Questionnaire responses, Companies House and Dun & Bradstreet.

Methodology: The importance of CT&K to each group was estimated using the comparison metrics set out in brackets for each group. GVA was estimated by summing operating profits, employment costs, depreciation, and amortisation. The average EBITDA margin was estimated by dividing the sum of operating profit, depreciation, and amortisation by turnover. The assessment of vulnerability to negative economic impacts was made by examining financial data from the most recent four accounts.



H5. Likely impact on affected industries and consumers

287. In this section, we attempt to assess the overall impact that the proposed 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 supply chain might change (i) if the measure were to be extended, and (ii) if it were revoked. The likely impact of the measure is the difference between these two states.
288. Due to a lack of evidence on current prices and quantities across the market, we have been unable to monetise impacts for this assessment. We have instead qualitatively assessed the likely size and direction of impacts on affected groups.

H5.1 Expected impacts if measure is extended

289. As discussed in section [G5.1 Domestic market conditions](#) above, we assess that the majority of the UK CT&K market is sourced via imports. If the duties were to remain in place, we expect that current market shares and prices would continue. According to the latest research study, the demand of UK [Ceramic Tableware Market](#) size & share in terms of revenue was valued at £330.5 million in 2022 and it is expected to surpass the £449 million mark by 2030, growing at a compound annual growth rate (CAGR) of approximately 4.32% during the forecast period 2023 to 2030 ([Zion market research](#)).

H5.2 Estimated impacts if the measure is revoked

290. To qualitatively assess the estimated impacts if the measure is revoked, we assume that the revocation of the existing duties would lead to cheaper products imported into the UK from China.
291. CT&K are very heterogeneous with a huge range of varieties, so different types of producers may react in different ways to an increase in cheaper imports from China. Larger producers who make premium CT&K may be able to better defend their market position due to their size and ability to innovate and create new products due to their ability to use more significant proportion of their earning on R&D. Smaller producers, however, unless they are experiencing significant brand loyalty, may be more at risk from negative price shocks as their consumers are likely to be more price sensitive.

H5.3 Estimated welfare impacts of extending the measure on affected UK businesses and consumers

292. UK producers are likely to benefit from extending the measure but the size of the impacts on them will depend on the degree to which they compete on prices rather than other factors, such as quality. If prices were to be reduced significantly and



demand for CT&K is less elastic than expected with high pass-through, the effects on producers could be more pronounced.

293. The impact for upstream businesses should be low but positive. The companies sampled have strong profits and a high turnover and overall, are not solely reliant on CT&K for their business.
294. Extending the measure will restrict the ability of importers of ceramic tableware from the PRC to compete in the UK market, but the fact that there are still significant imports with the current measure in place suggests the negative impacts on this group are not likely to be too severe.
295. For downstream businesses, extending the measure is likely to lead to negative impacts compared to revoking it. These impacts are likely to be less important for larger businesses where CT&K is one of many products they produce. The degree to which they will be impacted will also depend on the degree to which they can pass costs onto consumers.
296. Consumers may experience higher prices for CT&K because importers often pass on additional costs. If the measure were to be extended, the current market dynamics are likely to persist, maintaining elevated prices and potentially reducing the variety of affordable CT&K goods available to consumers.

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

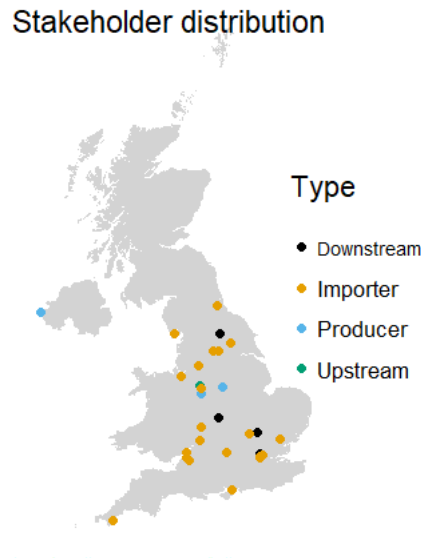
297. This section explores how impacts of the proposed variation of the measure are likely to be geographically distributed and whether any particular groups might be disproportionately impacted.

H6.1 Likely impact on particular areas

298. Stoke-on-Trent in the West Midlands is the home of the UK CT&K industry. In addition, Derby, Northern Ireland, London, and Bristol are where the CT&K industry (including its different parts of the supply chain) is concentrated in the UK.



Figure 4: Locations of selected UK businesses that are part of the UK supply chain for CT&K



Source: Dun & Bradstreet

Notes: This map shows the location of UK producers of CT&K, all known upstream businesses, sampled downstream businesses, and sampled UK importers of CT&K. One sampled importer located on the Isle of Man has been omitted from this map.

299. To assess the likely geographic impact in our analysis we considered the importance of the supply chain for CT&K 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 CT&K. Where this proportion was more than 1%, we concluded that the supply chain for CT&K is an important part of the local labour market.
300. Amongst selected companies, we found the CT&K industry is a large employer in Stoke-on-Trent however the proportion is marginally below 1%. CT&K is not important as a source of employment in any other TTWA within the UK².
301. In Stoke-on-Trent the manufacture of ceramic tableware and kitchenware makes up the largest proportion of employers in the area, providing skilled employment and making a vital economic contribution to the economy. This is not only in reference to employment, but also to the visitor economy which generates approximately £2.3 billion to the local economy.
302. We concluded that no geographic areas were likely to face disproportionate impacts as a result of the measure.

² For the District Council of Fermanagh and Omagh, the data for the working age population was taken from [Microsoft PowerPoint 220131 FO Socio-Economic Profile MASTER](#). For the Isle of Man, the data for the working age population was taken from [our-big-picture-phase-1-part-1-addendum-final-public.pdf](#). Working-age population data for all other TTWAs was taken from the Annual Population Survey (APS) from the Office of National Statistics (ONS).



H6.2 Likely impact on particular groups

303. We considered the likely impact on particular groups including those with protected characteristics as defined by the Equality Act 2010.
304. No party provided any evidence with respect to potential impacts on any particular groups, either as workers or consumers. However, Churchill China claimed their workforce were highly skilled and would find it difficult to find equivalent employment were they to exit the market.
305. 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

306. 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 the incentives to compete vigorously; and
 - The impact on the choices and information available to consumers.
307. Extending the measure may help UK producers to compete but would make it harder for PRC producers to compete compared to the measure being revoked. The net impact is unclear, but it is unlikely to significantly alter the number or range of suppliers in the market.
308. There is no evidence to suggest that the ability of suppliers to compete, the incentives to compete vigorously or the choices available to consumers would be substantially affected if the measure were to be extended.

H8. Such other matters as the TRA considers relevant

309. As part of the EIT, we consider any other factors additional to those set out in the legislation which have implications in concluding whether the varied trade remedy measure would be in the economic interest of the UK.
310. We received no further evidence from interested parties.



H9. Form of measure

311. The current measure is an ad valorem tariff of between 13.1% to 18.3% covering all products imported under the commodity codes set out in Section B2 from the PRC.
312. In the EIT, we consider whether any changes to the length, coverage or amount of duty of the measure, would minimise the negative impacts of the measure on some parties while retaining the overall benefits.
313. We found no evidence suggesting that a form of measure, other than the recommended variation, would be more appropriate.

H10. Conclusion on the Economic Interest Test

314. In accordance with paragraph 25 of the Schedule 4 to the Taxation Act, we consider whether the application of a remedy in accordance with our recommendation, or with each option, would be in the economic interest of the UK. The EIT is presumed to be met unless we are satisfied that the application of the remedy is not in the economic interest of the UK.
315. Following the dumping and injury likelihood assessments, in sections [F](#) and [G](#) respectively, we concluded that:
316. In section [H4](#), we found that CT&K was a very important product for UK producers and somewhat important for importers.
317. In section [H5](#), we assess how prices and quantities throughout the supply chain will be impacted with and without an anti-dumping duty. We have not been able to quantify these impacts because of the limited amount of data and quantifiable evidence available, but we did not find evidence of substantial negative impacts on affected businesses or consumers.
318. In section [H6](#), we found no evidence of significant impacts on particular geographic areas or particular groups in the UK, and that no geographic areas were likely to face disproportionate impacts as a result of the measure.
319. In section [H7](#), we were unable to assess if there would be any likelihood of a change in the competitive landscape as there is little or no evidence to support this assessment.
320. We have identified the following key positive impacts of extending the measure:
- Current market shares and prices will be maintained which will be beneficial for UK producers especially smaller producers.



321. The contrasting key negative impacts are:

- Duties increase the cost of imported ceramic goods, which can lead to higher prices and less choice for consumers owing to imported goods from the PRC having a wider range of affordable designs and styles; and
- Businesses reliant on Chinese CT&K imports may face financial difficulties, affecting wholesalers, retailers, and distributors.

322. Overall, we have not found evidence of negative impacts which are disproportionate to the need to remove injury to UK producers. Based on the evidence available and having considered all of the factors listed in the legislation, pursuant to regulation 100(1E) of the Regulations, we advise the Secretary of State that we consider that the variation of the measure in accordance with our intended final recommendation meets the Economic Interest Test.



Section I: Findings and Intended Final Recommendation

I1. Findings

323. The TRA has found that it is likely, on the balance of probabilities, that dumping of the goods subject to review would continue in increased volumes if the anti-dumping amounts were no longer applied to those goods.
324. The TRA also found that it is likely, on the balance of probabilities, that injury to the UK industry in the like goods would recur if the anti-dumping amounts were no longer applied to the goods subject to review.
325. The TRA considers that the proposed variation of the measure in accordance with our intended final recommendation meets the Economic Interest Test (see regulation 100(1E) of the Regulations).

I2. Intended Final Recommendation

326. Our intended final recommendation is to vary the application of the anti-dumping amounts under regulations 100(1), (2)(a)(i) and 100A of the Regulations. As we did not receive any compelling evidence to cause us to consider whether recalculation was appropriate, and as it has not been possible to recalculate the anti-dumping amounts, we intend to recommend maintaining the anti-dumping amounts pursuant to regulation 100A(4)(b) of the Regulations for a period of five years from 16 July 2024, that is, the date when the measure would have otherwise expired had no transition review been initiated (see [Taxation Notice 2020/30](#); see also regulation 97C of the Regulations).
327. We intend to make this final recommendation on the grounds that we have assessed that it is likely that dumping of the goods subject to review would continue in increased volumes if the anti-dumping measure were no longer applied to those goods; that injury is likely to recur to the UK industry in the like goods if the measure were no longer applied to the goods subject to review; and that we consider that the variation of the measure in accordance with our intended final recommendation meets the EIT.
328. Annexes [1](#), [2](#) and [3](#) specify the duties to be maintained and applied to the goods described or imported under the UK customs codes detailed therein. We intend to recommend maintaining the form and levels of the transitioned UK measure.



Annex 1: Duty amount and additional TAP codes

Foreign country	Overseas exporter	Duty amount	Additional TAP code
The PRC	Guangxi Sanhuan Enterprise Group Holding Co., Ltd	13.1%	B350
The PRC	Hunan Hualian China Industry Co., Ltd	18.3%	B349
The PRC	Hunan Hualian Ebillion Industry Co., Ltd	18.3%	B349
The PRC	Hunan Hualian Yuxiang China Industry Co., Ltd	18.3%	B349
The PRC	Hunan Liling Hongguanyao China Industry Co., Ltd	18.3%	B349
The PRC	Overseas exporter specified in Annex 2	17.6%	(per Annex 2)
The PRC	Overseas exporter specified in Annex 3	17.9%	(per Annex 3)
The PRC	All other overseas exporters (residual amount)	36.1%	B999

Annex 2: Overseas exporters subject to 17.6% duty amount (8 companies)

#	Foreign country	Overseas exporter	Additional TAP code
1	The PRC	Linyi Chunguang Ceramics Co., Ltd	B352
2	The PRC	Linyi Jingshi Ceramics Co., Ltd	B352
3	The PRC	Linyi Silver Phoenix Ceramics Co., Ltd	B352
4	The PRC	Linyi Zefeng Ceramics Co., Ltd	B352
5	The PRC	Niceton Ceramics (Linyi) Co., Ltd	B352
6	The PRC	Shandong Silver Phoenix Co., Ltd	B352
7	The PRC	Shandong Zibo Niceton-Marck Huaguang Ceramics Limited	B352
8	The PRC	Zibo Huatong Ceramics Co., Ltd	B352



Annex 3: Overseas exporters subject to 17.9% duty amount (392 companies)

#	Foreign country	Overseas exporter	Additional TAP code
1	The PRC	Amaida Ceramic Product Co., Ltd	B357
2	The PRC	Asianera Porcelain (Tangshan) Ltd	B358
3	The PRC	Beiliu Changlong Ceramics Co., Ltd	B359
4	The PRC	Beiliu City Heyun Building Materials Co., Ltd	B361
5	The PRC	Beiliu Quanli Ceramic Co., Ltd	B363
6	The PRC	Beiliu Shimin Porcelain Co., Ltd	B364
7	The PRC	Beiliu Windview Industries Ltd	B365
8	The PRC	Cameo China (Fengfeng) Co., Ltd	B366
9	The PRC	Changsha Happy Go Products Developing Co., Ltd	B367
10	The PRC	Chao An Huadayu Craftwork Factory	B368
11	The PRC	Chaoan County Fengtang Town HaoYe Ceramic Fty	B369
12	The PRC	Chao'an Lian Xing Yuan Ceramics Co., Ltd	B370
13	The PRC	Chaoan Oh Yeah Ceramics Industrial Co., Ltd	B371
14	The PRC	Chaoan Shengyang Crafts Industrial Co., Ltd	B372
15	The PRC	Chaoan Xin Yuan Ceramics Factory	B373
16	The PRC	Chao'an Yongsheng Ceramic Industry Co., Ltd	B374
17	The PRC	Chaozhou Baode Ceramics Co., Ltd	B376
18	The PRC	Chaozhou Baolian Ceramics Co., Ltd	B377
19	The PRC	Chaozhou Big Arrow Ceramics Industrial Co., Ltd	B378
20	The PRC	Chaozhou Boshifa Ceramics Making Co., Ltd	B379
21	The PRC	Chaozhou Cantake Craft Co., Ltd	B380
22	The PRC	Chaozhou Ceramics Industry and Trade General Corp	B381
23	The PRC	Chaozhou Chaofeng Ceramic Making Co., Ltd	B382
24	The PRC	Chaozhou Chengxi Jijie Art & Craft Painted Porcelain Fty	B383
25	The PRC	Chaozhou Chengxinda Ceramics Industry Co., Ltd	B384
26	The PRC	Chaozhou Chenhui Ceramics Co., Ltd	B385
27	The PRC	Chaozhou Chonvson Ceramics Industry Co., Ltd	B386
28	The PRC	Chaozhou Daxin Arts & Crafts Co., Ltd	B387
29	The PRC	Chaozhou DaXing Ceramics Manufactory Co., Ltd	B388
30	The PRC	Chaozhou Dayi Ceramics Industries Co., Ltd	B389
31	The PRC	Chaozhou Dehong Ceramics Making Co., Ltd	B390
32	The PRC	Chaozhou Deko Ceramic Co., Ltd	B391
33	The PRC	Chaozhou Diamond Ceramics Industrial Co., Ltd	B392
34	The PRC	Chaozhou Dongyi Ceramics Co., Ltd	B393
35	The PRC	Chaozhou Dragon Porcelain Industrial Co., Ltd	B394
36	The PRC	Chaozhou Fairway Ceramics Manufacturing Co., Ltd	B395
37	The PRC	Chaozhou Feida Ceramics Industries Co., Ltd	B396
38	The PRC	Chaozhou Fengxi Baita Ceramics Fty	B397
39	The PRC	Chaozhou Fengxi Dongtian Porcelain Fty. No.2	B398
40	The PRC	Chaozhou Fengxi Fenger Ceramics Craft Fty	B399
41	The PRC	Chaozhou Fengxi Hongrong Color Porcelain Fty	B400
42	The PRC	Chaozhou Fengxi Jiaxiang Ceramic Manufactory	B401
43	The PRC	Guangdong GMT Foreign Trade Service Corp	B402
44	The PRC	Chaozhou Fengxi Shengshui Porcelain Art Factory	B403
45	The PRC	Chaozhou Fengxi Zone Jinbaichuan Porcelain Crafts Factory	B404
46	The PRC	Chaozhou Fromone Ceramic Co., Ltd	B405



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47	The PRC	Chaozhou Genol Ceramics Manufacture Co., Ltd	B406
48	The PRC	Chaozhou Good Concept Ceramics Co., Ltd	B407
49	The PRC	Chaozhou Grand Collection Ceramics Manufacturing Co. Ltd	B408
50	The PRC	Chaozhou Guangjia Ceramics Manufacture Co., Ltd	B409
51	The PRC	Chaozhou Guidu Ceramics Co., Ltd	B410
52	The PRC	Chaozhou Haihong Ceramics Making Co., Ltd	B411
53	The PRC	Chaozhou Hengchuang Porcelain Co., Ltd	B412
54	The PRC	Chaozhou Henglibao Porcelain Industrial Co., Ltd	B413
55	The PRC	Chaozhou Hongbo Ceramics Industrial Co., Ltd	B414
56	The PRC	Chaozhou Hongjia Ceramics Making Co., Ltd	B415
57	The PRC	Chaozhou Hongye Ceramics Manufactory Co., Ltd	B416
58	The PRC	Chaozhou Hongye Porcelain Development Co., Ltd	B417
59	The PRC	Chaozhou Hongyue Porcelain Industry Co., Ltd	B418
60	The PRC	Chaozhou Hongzhan Ceramic Manufacture Co., Ltd	B419
61	The PRC	Chaozhou Hua Da Ceramics Making Co., Ltd	B420
62	The PRC	Chaozhou Huabo Ceramic Co., Ltd	B421
63	The PRC	Chaozhou Huade Ceramics Manufacture Co., Ltd	B422
64	The PRC	Chaozhou Huashan Industrial Co., Ltd	B423
65	The PRC	Chaozhou Huayu Ceramics Co., Ltd	B424
66	The PRC	Chaozhou Huazhong Ceramics Industries Co., Ltd	B425
67	The PRC	Chaozhou Huifeng Ceramics Craft Making Co., Ltd	B426
68	The PRC	Chaozhou J&M Ceramics Industrial Co., Ltd	B427
69	The PRC	Chaozhou Tensymic Co., Ltd (previously: "Chaozhou Jencymic Co., Ltd")	B428
70	The PRC	Chaozhou Jiahua Ceramics Co., Ltd	B429
71	The PRC	Chaozhou Jiahuabao Ceramics Industrial Co., Ltd	B430
72	The PRC	Chaozhou JiaHui Ceramic Factory	B431
73	The PRC	Chaozhou Jiaye Ceramics Making Co., Ltd	B432
74	The PRC	Chaozhou Jiayi Ceramics Making Co., Ltd	B433
75	The PRC	Chaozhou Jiayu Ceramics Making Co., Ltd	B434
76	The PRC	Chaozhou Jin Jia Da Porcelain Industry Co., Ltd	B435
77	The PRC	Chaozhou Jingfeng Ceramics Craft Co., Ltd	B436
78	The PRC	Chaozhou Jinxin Ceramics Making Co., Ltd	B438
79	The PRC	Chaozhou Jinyuanli Ceramics Manufacture Co., Ltd	B439
80	The PRC	Chaozhou Kaibo Ceramics Making Co., Ltd	B440
81	The PRC	Chaozhou Kedali Porcelain Industrial Co., Ltd	B441
82	The PRC	Chaozhou King's Porcelain Industry Co., Ltd	B442
83	The PRC	Chaozhou Kingwave Porcelain & Pigment Co., Ltd	B443
84	The PRC	Chaozhou Lemontree Tableware Co., Ltd	B444
85	The PRC	Chaozhou Lianfeng Porcelain Co., Ltd	B445
86	The PRC	Chaozhou Lianyu Ceramics Co., Ltd	B447
87	The PRC	Chaozhou Lianyuan Ceramic Making Co., Ltd	B448
88	The PRC	Chaozhou Lisheng Ceramics Co., Ltd	B449
89	The PRC	Chaozhou Loving Home Porcelain Co., Ltd	B450
90	The PRC	Chaozhou Maocheng Industry Dve. Co., Ltd	B451
91	The PRC	Chaozhou MBB Porcelain Factory	B452
92	The PRC	Chaozhou New Power Co., Ltd	B454
93	The PRC	Chaozhou Ohga Porcelain Co., Ltd	B455
94	The PRC	Chaozhou Oubo Ceramics Co., Ltd	B456
95	The PRC	Chaozhou Pengfa Ceramics Manufactory Co., Ltd	B457
96	The PRC	Chaozhou Pengxing Ceramics Co., Ltd	B458
97	The PRC	Chaozhou Qingfa Ceramics Co., Ltd	B459



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98	The PRC	Chaozhou Ronghua Ceramics Making Co., Ltd	B460
99	The PRC	Chaozhou Rui Cheng Porcelain Industry Co., Ltd	B462
100	The PRC	Chaozhou Rui Xiang Porcelain Industrial Co., Ltd	B463
101	The PRC	Chaozhou Ruilong Ceramics Co., Ltd	B464
102	The PRC	Chaozhou Sanhua Ceramics Industrial Co., Ltd	B465
103	The PRC	Chaozhou Sanming Industrial Co., Ltd	B466
104	The PRC	Chaozhou Santai Porcelain Co., Ltd	B467
105	The PRC	Chaozhou Shuntai Ceramic Manufactory Co., Ltd	B468
106	The PRC	Chaozhou Songfa Ceramics Co.,Ltd	B469
107	The PRC	Chaozhou Sundisk Ceramics Making Co., Ltd	B470
108	The PRC	Chaozhou Teemjade Ceramics Co., Ltd	B471
109	The PRC	Chaozhou Thyme Ceramics Co., Ltd	B472
110	The PRC	Chaozhou Tongxing Huajiang Ceramics Making Co., Ltd	B473
111	The PRC	Chaozhou Trend Arts & Crafts Co., Ltd	B475
112	The PRC	Chaozhou Uncommon Craft Industrial Co., Ltd	B476
113	The PRC	Chaozhou Weida Ceramic Making Co., Ltd	B477
114	The PRC	Chaozhou Weigao Ceramic Craft Co., Ltd	B478
115	The PRC	Chaozhou Wingoal Ceramics Industrial Co., Ltd	B479
116	The PRC	Chaozhou Wood House Porcelain Co., Ltd	B480
117	The PRC	Chaozhou Xiangye Ceramics Craft Making Co., Ltd	B481
118	The PRC	Chaozhou Xin Weicheng Co., Ltd	B482
119	The PRC	Chaozhou Xincheng Ceramics Co., Ltd	B483
120	The PRC	Chaozhou Xingguang Ceramics Co., Ltd	B485
121	The PRC	Chaozhou Wenhui Porcelain Co., Ltd	B486
122	The PRC	Chaozhou Xinkai Porcelain Co., Ltd	B487
123	The PRC	Chaozhou Xinlong Porcelain Industrial Co., Ltd	B488
124	The PRC	Chaozhou Xinyu Porcelain Industrial Co., Ltd	B489
125	The PRC	Chaozhou Xinyue Ceramics Manufacture Co., Ltd	B490
126	The PRC	Chaozhou Yangguang Ceramics Co., Ltd	B491
127	The PRC	Chaozhou Yinhe Ceramics Co., Ltd	B493
128	The PRC	Chaozhou Yongsheng Ceramics Manufacturing Co., Ltd	B494
129	The PRC	Chaozhou Yongxuan Domestic Ceramics Manufactory Co., Ltd	B495
130	The PRC	Chaozhou Yu Ri Ceramics Making Co., Ltd	B496
131	The PRC	Chaozhou Yuefeng Ceramics Ind. Co., Ltd	B497
132	The PRC	Chaozhou Yufeng Ceramics Making Factory	B498
133	The PRC	Chaozhou Zhongxia Porcelain Factory Co., Ltd	B499
134	The PRC	Chaozhou Zhongye Ceramics Co., Ltd	B500
135	The PRC	China Yong Feng Yuan Co., Ltd	B747
136	The PRC	Dabu Yongxingxiang Ceramics Co., Ltd	B501
137	The PRC	Dapu Fuda Ceramics Co., Ltd	B502
138	The PRC	Dapu Taoyuan Porcelain Factory	B503
139	The PRC	Dasheng Ceramics Co., Ltd. Dehua	B504
140	The PRC	De Hua Hongshun Ceramic Co., Ltd	B505
141	The PRC	Dehua Hongsheng Ceramic Co., Ltd	B506
142	The PRC	Dehua Jianyi Porcelain Industry Co., Ltd	B507
143	The PRC	Dehua Kaiyuan Porcelain Industry Co., Ltd	B508
144	The PRC	Dehua Ruyuan Gifts Co., Ltd	B509
145	The PRC	Dehua Xinmei Ceramics Co., Ltd	B510
146	The PRC	Dongguan Kennex Ceramic Ltd	B511
147	The PRC	Dongguan Shilong Kyocera Co., Ltd	B512
148	The PRC	Dongguan Yongfuda Ceramics Co., Ltd	B513
149	The PRC	Excellent Porcelain Co., Ltd	B515



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150	The PRC	Fair-Link Limited (Xiamen)	B516
151	The PRC	Far East (chaozhou) Ceramics Factory Co., Ltd	B518
152	The PRC	Fengfeng Mining District Yuhang Ceramic Co. Ltd. ("Yuhang")	B519
153	The PRC	Foshan Metart Company Limited	B520
154	The PRC	Fujian Dehua Chengyi Ceramics Co., Ltd	B522
155	The PRC	Fujian Dehua Five Continents Ceramic Manufacturing Co., Ltd.	B523
156	The PRC	Fujian Dehua Fujue Ceramics Co., Ltd	B524
157	The PRC	Fujian Dehua Full Win Crafts Co., Ltd	B525
158	The PRC	Fujian Dehua Fusheng Ceramics Co., Ltd	B526
159	The PRC	Fujian Dehua Gentle Porcelain Co., Ltd	B527
160	The PRC	Fujian Dehua Guanhong Ceramic Co., Ltd	B528
161	The PRC	Fujian Dehua Guanjie Ceramics Co., Ltd	B529
162	The PRC	Fujian Dehua Hiap Huat Koyo Toki Co., Ltd	B530
163	The PRC	Fujian Dehua Hongda Ceramics Co., Ltd	B531
164	The PRC	Fujian Dehua Hongsheng Arts & Crafts Co., Ltd	B532
165	The PRC	Fujian Dehua Hongyu Ceramic Co., Ltd	B533
166	The PRC	Fujian Dehua Huachen Ceramics Co., Ltd	B534
167	The PRC	Fujian Dehua Huamao Ceramics Co., Ltd	C303
168	The PRC	Fujian Dehua Huaxia Ceramics Co., Ltd	B535
169	The PRC	Fujian Dehua Huilong Ceramic Co., Ltd	B536
170	The PRC	Fujian Dehua Jiawei Ceramics Co., Ltd	C304
171	The PRC	Fujian Dehua Jingyi Ceramics Co., Ltd	B537
172	The PRC	Fujian Dehua Jinhua Porcelain Co., Ltd	B538
173	The PRC	Fujian Dehua Jinzhu Ceramics Co., Ltd	B539
174	The PRC	Fujian Dehua Lianda Ceramic Co., Ltd	B540
175	The PRC	Fujian Dehua Myinghua Ceramics Co., Ltd	B541
176	The PRC	Fujian Dehua New Qili Arts Co., Ltd	C305
177	The PRC	Fujian Dehua Pengxin Ceramics Co., Ltd	B542
178	The PRC	Fujian Dehua Sanfeng Ceramics Co. Ltd	C485
179	The PRC	Fujian Dehua Shisheng Ceramics Co., Ltd.	B544
180	The PRC	Fujian Dehua Will Ceramic Co., Ltd	B545
181	The PRC	Fujian Dehua Xianda Ceramic Factory	B546
182	The PRC	Fujian Dehua Xianghui Ceramic Co., Ltd	B547
183	The PRC	Fujian Dehua Yonghuang Ceramic Co., Ltd	B549
184	The PRC	Fujian Dehua Yousheng Ceramics Co., Ltd	B550
185	The PRC	Fujian Dehua You-Young Crafts Co., Ltd	B551
186	The PRC	Fujian Dehua Zhenfeng Ceramics Co., Ltd	B552
187	The PRC	Fujian Dehua Zhennan Ceramics Co., Ltd	B553
188	The PRC	Fujian Jackson Arts and Crafts Co., Ltd	B554
189	The PRC	Fujian Jiamei Group Corporation	B555
190	The PRC	Fujian Jiashun Arts&Crafts Co., Ltd	B521
191	The PRC	Fujian Province Dehua County Beatrot Ceramic Co., Ltd	B557
192	The PRC	Fujian Province Yongchun County Foreign Processing and	B558
193	The PRC	Fujian Quanzhou Longpeng Group Co., Ltd	B559
194	The PRC	Fujian Quanzhou Shunmei Group Co., Ltd	B560
195	The PRC	Fung Lin Wah Group	B561
196	The PRC	Ganzhou Koin Structure Ceramics Co., Ltd	B562
197	The PRC	Gemmi (Shantou) Industrial Co., Ltd	B958
198	The PRC	Global Housewares Factory	B563
199	The PRC	Guangdong Baodayai Porcelain Co. Ltd. (formerly Chaozhou	B375
200	The PRC	Guangdong Baofeng Ceramic Technology Development Co., Ltd	B564
201	The PRC	Guangdong Bening Ceramics Industries Co., Ltd	B565



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202	The PRC	Guangdong Daye Porcelain Co., Ltd	B566
203	The PRC	Guangdong Dongbao Group Co., Ltd	B567
204	The PRC	Guangdong Huaxing Ceramics Co., Ltd	B568
205	The PRC	Guangdong Jinqiangyi Ceramics Co., Ltd	B437
206	The PRC	Guangdong Mingyu Technology Joint Stock Limited Company	B453
207	The PRC	Guangdong Quanfu Ceramics Ind. Co., Ltd	B569
208	The PRC	Guangdong Ronglibao Homeware Co., Ltd	B461
209	The PRC	Guangdong Shunqiang Ceramics Co., Ltd	B570
210	The PRC	Guangdong Shunxiang Porcelain Co., Ltd	B571
211	The PRC	Guangdong Sitong Group Co., Ltd	B572
212	The PRC	Guangdong Totye Ceramics Industrial Co., Ltd	B474
213	The PRC	GuangDong XingTaiYi Porcelain Co., Ltd	B574
214	The PRC	Guangdong Yutai Porcelain Co., Ltd	B575
215	The PRC	Guangdong Zhentong Ceramics Co., Ltd	B576
216	The PRC	Guangxi Baian Ceramic Co. Ltd	B577
217	The PRC	Guangxi Beiliu City Ming Chao Porcelain Co., Ltd	B578
218	The PRC	Guangxi Beiliu Huasheng Porcelain Ltd	B580
219	The PRC	Guangxi Beiliu Newcentury Ceramic Llc	B581
220	The PRC	Guangxi Beiliu Qinglang Porcelain Trade Co., Ltd	B582
221	The PRC	Guangxi Beiliu Xiongfa Ceramics Co., Ltd	B584
222	The PRC	Guangxi Beiliu Yujie Porcelain Co., Ltd	B585
223	The PRC	Guangxi Beiliu Zhongli Ceramics Co., Ltd	B586
224	The PRC	Guangxi Nanshan Porcelain Co., Ltd	B587
225	The PRC	Guangxi Yulin Rongxing Ceramics Co., Ltd	B589
226	The PRC	Guangzhou Chaintime Porcelain Co., Ltd	B590
227	The PRC	Haofa Ceramics Co., Ltd. of Dehua Fujian	B591
228	The PRC	Hebei Dersun Ceramic Co., Ltd	B592
229	The PRC	Hebei Great Wall Ceramic Co., Ltd.	B593
230	The PRC	Henan Ruilong Ceramics Co., Ltd	B594
231	The PRC	Henghui Porcelain Plant, Liling, Hunan, China	B595
232	The PRC	Huanyu Ceramic Industrial Co., Ltd, Liling, Hunan, China	B596
233	The PRC	Huatai Ceramics Industry Limited, Hunan, China	C551
234	The PRC	Hunan Baihua Ceramics Co., Ltd	B597
235	The PRC	Hunan Eka Ceramics Co., Ltd	B598
236	The PRC	Hunan Fungdeli Ceramics Co., Ltd	B599
237	The PRC	Hunan Gaofeng Ceramic Manufacturing Co., Ltd	B600
238	The PRC	Hunan Huari Ceramic Industry Co., Ltd	B601
239	The PRC	Hunan Huayun Ceramics Factory Co., Ltd	B603
240	The PRC	Hunan Huazhi Ceramic Co., Ltd	C550
241	The PRC	Hunan Jewelmoon Ceramics Co., Ltd <i>(added as a result of NE0043 – Trade remedies notice 2024/05)</i>	8A23
242	The PRC	Hunan Liling Tianxin China Industry Ltd.	B604
243	The PRC	Hunan Provincial Liling Chuhua Ceramic Industrial Co., Ltd	B605
244	The PRC	Hunan Quanxiang Ceramics Corp. Ltd	B606
245	The PRC	Hunan Rslee Ceramics Co., Ltd	B607
246	The PRC	Hunan Taisun Ceramics Co., Ltd	B608
247	The PRC	Hunan Victor Imp. & Exp. Co., Ltd	B609
248	The PRC	Hunan Xianfeng Ceramic Industry Co., Ltd	B611
249	The PRC	Jiangsu Gaochun Ceramics Co., Ltd	B612
250	The PRC	Jiangsu Yixing Fine Pottery Corp., Ltd	B613
251	The PRC	Jiangxi Global Ceramic Co., Ltd	B614
252	The PRC	Jiangxi Kangshu Porcelain Co.,Ltd	B615



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253	The PRC	Jingdezhen F&B Porcelain Co., Ltd	B616
254	The PRC	Jingdezhen Yuanjing Porcelain Industry Co., Ltd	B617
255	The PRC	Jing He Ceramics Co., Ltd	B959
256	The PRC	Jiyuan Jukang Xinxing Ceramics Co., Ltd	B618
257	The PRC	Junior Star Ent's Co., Ltd	B620
258	The PRC	K&T Ceramics International Co., Ltd	B621
259	The PRC	Kam Lee (Xing Guo) Metal and Plastic Fty. Co., Ltd	B622
260	The PRC	Karpery Industrial Co., Ltd. Hunan China	B623
261	The PRC	Kerun Ceramics Manufactory Ltd	C551
262	The PRC	Kilncraft Ceramics Ltd	B624
263	The PRC	Lian Jiang Golden Faith Porcelain Co., Ltd	B625
264	The PRC	Liling Gaojia Ceramic Industry Co., Ltd	B626
265	The PRC	Liling GuanQian Ceramic Manufacture Co., Ltd	B627
266	The PRC	Liling Huahui Ceramic Manufacturing Co., Ltd	B628
267	The PRC	Liling Huawang Ceramics Manufacturing Co., Ltd	B629
268	The PRC	Liling Jiahua Porcelain Manufacturing Co., Ltd	B630
269	The PRC	Liling Jialong Porcelain Industry Co., Ltd	B631
270	The PRC	Liling Jiaxing Ceramic Industrial Co., Ltd	B632
271	The PRC	Liling Kaiwei Ceramic Co., Ltd	B633
272	The PRC	Liling Liangsheng Ceramic Manufacture Co., Ltd	B634
273	The PRC	Liling Liuxingtang Ceramics Co., Ltd	B635
274	The PRC	Liling Minghui Ceramics Factory	B636
275	The PRC	Liling Pengxing Ceramic Factory	B637
276	The PRC	Liling Quanhu Industries General Company	B638
277	The PRC	Liling Ruixiang Ceramics Industrial Co., Ltd	B640
278	The PRC	Liling Santang Ceramics Manufacturing Co., Ltd	B641
279	The PRC	Liling Shenghua Industrial Co., Ltd	B642
280	The PRC	Liling Spring Ceramic Industry Co., Ltd	B643
281	The PRC	Liling Tengrui Industrial and Trading Co.,Ltd	B644
282	The PRC	Liling Top Collection Industrial Co., Ltd	B645
283	The PRC	Liling United Ceramic-Ware Manufacturing Co., Ltd	B646
284	The PRC	Liling Xinyi Ceramics Industry Ltd	B957
285	The PRC	Liling Yonghe Porcelain Factory	B647
286	The PRC	Liling Yuanmei Ceramic Co., Ltd	C556
287	The PRC	Liling Yucha Ceramics Co., Ltd	B648
288	The PRC	Liling Zhengcai Ceramic Manufacturing Co., Ltd	B649
289	The PRC	Linyi Hongshun Porcelain Co, Ltd (added as a result of NE0048 – Trade remedies notice 2024/09)	8A27
290	The PRC	Linyi Jinli Ceramics Co., Ltd	B650
291	The PRC	Linyi Pengcheng Industry Co., Ltd	B651
292	The PRC	Linyi Wanqiang Ceramics Co., Ltd	B652
293	The PRC	Linyi Zhaogang Ceramics Co., Ltd	B653
294	The PRC	Liveon Industrial Co., Ltd	B654
295	The PRC	Long Da Bone China Co., Ltd	B655
296	The PRC	Meizhou Lianshunchang Trading Co., Ltd	B657
297	The PRC	Meizhou Xinma Ceramics Co., Ltd	B658
298	The PRC	Meizhou Yuanfeng Ceramic Industry Co., Ltd	B659
299	The PRC	Meizhou Zhong Guang Industrial Co., Ltd	B660
300	The PRC	Miracle Dynasty Fine Bone China (Shanghai) Co., Ltd	B661
301	The PRC	Photo USA Electronic Graphic Inc	B662
302	The PRC	Quanzhou Allen Light Industry Co., Ltd	B663
303	The PRC	Quanzhou Chuangli Craft Co., Ltd	B664



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304	The PRC	Quanzhou Dehua Fangsheng Arts Co., Ltd	B665
305	The PRC	Quanzhou Dehua Hengfeng Ceramics Co., Ltd	C306
306	The PRC	Quanzhou Haofu Gifts Co., Ltd	B666
307	The PRC	Quanzhou Hongsheng Group Corporation	B667
308	The PRC	Quanzhou Jianwen Craft Co., Ltd	B668
309	The PRC	Quanzhou Kunda Gifts Co., Ltd	B669
310	The PRC	Quanzhou Yongchun Shengyi Ceramics Co., Ltd	B670
311	The PRC	Raoping Bright Future Porcelain Factory ("RBF")	B671
312	The PRC	Raoping Sanrao Yicheng Porcelain Factory	B672
313	The PRC	Raoping Sanyi Industrial Co., Ltd	B673
314	The PRC	Raoping Suifeng Ceramics and Glass Factory	B674
315	The PRC	Raoping Xinfeng Yangda Colour Porcelain FTY	B675
316	The PRC	Red Star Ceramics Limited	B676
317	The PRC	Rong Lin Wah Industrial (Shenzhen) Co., Ltd	B677
318	The PRC	Shandong Futai Ceramics Co., Ltd	B679
319	The PRC	Shandong Gaode Hongye Ceramics Co., Ltd	B680
320	The PRC	Shandong Kunlun Ceramic Co., Ltd	B681
321	The PRC	Shandong Zhaoding Porcelain Co., Ltd	B682
322	The PRC	Shantou Ceramics Industry Supply & Marketing Corp	B683
323	The PRC	Sheng Hua Ceramics Co., Ltd	B684
324	The PRC	Shenzhen Baoshengfeng Imp. & Exp. Co., Ltd	B685
325	The PRC	Shenzhen Bright Future Industry Co., Ltd. ("SBF")	B686
326	The PRC	Shenzhen Ehome Enterprise Ltd	B688
327	The PRC	Shenzhen Ever Nice Industry Co., Ltd	B689
328	The PRC	Shenzhen Fuliuyan Porcelain Co., Ltd	B690
329	The PRC	Shenzhen Full Amass Ind. Dev. Co. Ltd	B691
330	The PRC	Shenzhen Gottawa Industrial Ltd	B694
331	The PRC	Shenzhen Hiker Housewares Ltd	B695
332	The PRC	Shenzhen Hua Mei Industry Development Ltd	B696
333	The PRC	Shenzhen Mingsheng Ceramic Ltd	B697
334	The PRC	Shenzhen Senyi Porcelain Industry Co. Ltd	B698
335	The PRC	Shenzhen SMF Investment Co., Ltd	B699
336	The PRC	Shenzhen Tao Hui Industrial Co., Ltd	B700
337	The PRC	Shenzhen Topchoice Industries Limited	B701
338	The PRC	Shenzhen Trueland Industrial Co., Ltd	B702
339	The PRC	Shenzhen Universal Industrial Co., Ltd	B703
340	The PRC	Shenzhen Zhan Peng Xiang Industrial Co., Ltd	B704
341	The PRC	Shijiazhuang Kuangqu Huakang Porcelain Co., Ltd	B705
342	The PRC	Shun Sheng Da Group Co., Ltd. Quanzhou Fujian	B706
343	The PRC	Stechcol Ceramic Crafts Development (Shenzhen) Co., Ltd	B707
344	The PRC	Taiyu Ceramic Co., Ltd. Liling Hunan China	B708
345	The PRC	Tangshan Beifangcidu Ceramic Group Co., Ltd	B709
346	The PRC	Tangshan Boyu Osseous Ceramic Co., Ltd	B710
347	The PRC	Tangshan Chinawares Trading Co., Ltd	B711
348	The PRC	Tangshan Golden Ceramic Co., Ltd	B713
349	The PRC	Tangshan Haigelei Fine Bone Porcelain Co., Ltd	B714
350	The PRC	Tangshan Hengrui Porcelain Industry Co., Ltd	B715
351	The PRC	Tangshan Huamei Porcelain Co., Ltd	B716
352	The PRC	Tangshan Huaxincheng Ceramic Products Co., Ltd	B717
353	The PRC	Tangshan Huyuan Bone China Co., Ltd	B718
354	The PRC	Tangshan Imperial-Hero Ceramics Co., Ltd	B719
355	The PRC	Tangshan Jinfangyuan Bone China Manufacturing Co., Ltd	B720



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356	The PRC	Tangshan Keyhandle Ceramic Co., Ltd	B721
357	The PRC	Tangshan Longchang Ceramics Co., Ltd	B722
358	The PRC	Tangshan Masterwell Ceramic Co., Ltd	B723
359	The PRC	Tangshan Shiyu Commerce Co., Ltd	B725
360	The PRC	Tangshan Xueyan Industrial Co., Ltd	B726
361	The PRC	Tangshan Yida Industrial Corp	B727
362	The PRC	Tao Yuan Porcelain Factory	B728
363	The PRC	Teammann Co., Ltd	B729
364	The PRC	The China & Hong Kong Resources Co., Ltd	B730
365	The PRC	The Great Wall of Culture Group Holding Co., Ltd Guangdong	B731
366	The PRC	Tianshan (Handan) Tableware Co., Ltd. ("Tianshan")	B732
367	The PRC	Topking Industry (China) Ltd	B733
368	The PRC	Weijian Ceramic Industrial Co., Ltd	B734
369	The PRC	Weiye Ceramics Co., Ltd	B735
370	The PRC	Winpat Industrial Co., Ltd	B736
371	The PRC	Xiamen Acrobat Splendor Ceramics Co., Ltd	B737
372	The PRC	Xiamen Johnchina Fine Polishing Tech Co., Ltd	B738
373	The PRC	Xiangqiang Ceramic Manufacturing Co., Ltd. Liling City Hunan	B739
374	The PRC	Xinhua County Huayang Porcelain Co., Ltd	B741
375	The PRC	Xin Xing Xian XinJiang Pottery Co., Ltd	B740
376	The PRC	Yangjiang Shi Ba Zi Kitchen Ware Manufacturing Co., Ltd	B743
377	The PRC	Yanling Hongyi Import N Export Trade Co., Ltd	B744
378	The PRC	Ying-Hai (Shenzhen) Industry Dev. Co., Ltd	B745
379	The PRC	Yiyang Red Star Ceramics Ltd	B746
380	The PRC	Yongchun Dahui Crafts Co., Ltd	B748
381	The PRC	Yu Yuan Ceramics Co., Ltd	B749
382	The PRC	Yuzhou City Kongjia Porcelain Co., Ltd	B750
383	The PRC	Zeal Ceramics Development Co., Ltd, Shenzhen, China	B753
384	The PRC	Zhangjiakou Xuanhua Yici Ceramics Co., Ltd. ("Xuanhua Yici")	B754
385	The PRC	Zhejiang Nansong Ceramics Co., Ltd	B755
386	The PRC	Zibo Boshan Shantou Ceramic Factory	B756
387	The PRC	Zibo CAC Chinaware Co., Ltd	B757
388	The PRC	Zibo Fortune Light Industrial Products Co., Ltd	B758
389	The PRC	Zibo GaoDe Ceramic Technology & Development Co., Ltd	B760
390	The PRC	Zibo Hongda Ceramics Co., Ltd	B761
391	The PRC	Zibo Jinxin Light Industrial Products Co., Ltd	B762
392	The PRC	Zibo Kunyang Ceramic Corporation Limited	B763



Annex 4: Interested parties

Summary of information received from interested parties and contributors

#	Name	Information received	Status
1	Churchill China (UK) Ltd	- Registration of interest* - Questionnaire response*	UK producer
2	Dunoon Ceramics Ltd	- Registration of interest* - Questionnaire response	UK producer
3	Denby Group Ltd	- Registration of interest*	UK producer
4	Steelite International Limited	- Registration of interest*	UK producer
5	Captivate Brands Ltd	- Registration of interest*	Importer
6	Inter Table Top Company	- Registration of interest*	Importer
7	Anonymous	- Registration of interest*	Importer
8	Anonymous	- Registration of interest*	Importer
9	Ceramics UK	- Registration of interest - Questionnaire response	Trade body
10	China Chamber of Commerce for Import and Export of Light Industrial Products and Arts-Crafts (CCCLA)	- Registration of interest - Questionnaire response*	Trade body
11	Hunan Quanxiang Ceramics Corp. Ltd	- Registration of interest - Questionnaire response*	Sampled exporter
12	Liling Top Collection Industrial Co., Ltd	- Registration of interest - Questionnaire response	Sampled exporter
13	Linyi Jingshi Ceramics Co., Ltd	- Registration of interest - Questionnaire response*	Sampled exporter
14	Hunan Hualian Group	- Registration of interest - Questionnaire response - Questionnaire response (Ebillion) - Questionnaire response (Hongguanyao)	Sampled exporter
15	Hunan Xianfeng Ceramic Industry Co., Ltd.	- Submission*	Exporter
16	All other PRC exporters	<i>(PSQs for all other PRC exporters were not uploaded to the public file due to the high volume of registrations)</i>	Exporter
17	Ministry of Commerce, PRC (MOFCOM)	- Registration of interest	Foreign government

* Note: the TRA uploaded these files on behalf of the relevant party due to technical issues.