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An die  
Europäische Kommission  
Generaldirektion Handel - Direktion H  
Büro N105 04/092  
B-1049 Buxelles/Brussel  
BELGIQUE/BELGIE

Halle/Westfalen, den 23.03.2012

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**2012/C 44/07, Bekanntmachung ABI C 44/22 vom 16.02.2012  
Antidumpingverfahren betreffend die Einfuhren von Geschirr und anderen Artikeln aus  
Keramik für den Tisch- oder Küchengebrauch mit Ursprung in der Volksrepublik China**

Dear Ladies and Gentlemen,

due to the complaint of dumped porcelain from PRC to the Union lodged on behalf of EU producers of ceramic tableware and kitchenware we herewith write within the time limit provided by section 5.4 of the Notice of Initiation and send you our third

**Response**

**1. The EU market for ceramic tableware and kitchenware**

The EU market for ceramic tableware and kitchenware is not a homogeneous single market.

Prices, quality and brand of products points of sale require to divide the market for the ceramic products concerned (CN codes 6911, 6912) into at least the following three segments

- premium (high quality, high prices)
- medium/low (medium/low quality, medium/low prices)
- special products (such as decorative items, souvenirs, pots, hotel porcelain)

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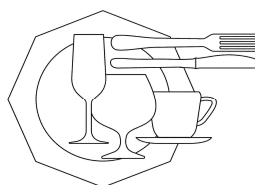
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The major portion of the EU production output is sold on the premium and/or special product markets, whereas Chinese imports are predominantly destined to serve the low price market segment. Chinese imports, therefore, do not directly compete EU production.

There is no Chinese exporting producer who is also doing business as an importer or distributor of products within the European Union. Every single item of the products under investigation, which is exported from China, is, at the same time, imported into the European Union by one or more European importers.

In terms of mere weight, Chinese imports represent a market share of app. 66% of the total market, and the industry connected with, and the number of employments and other sources of income directly depending on, the importation, distribution, logistics and retail sale of these imports represents a far larger 'Community industry' than the EU producers do.

The 'industry of Community importers' is entitled to the same degree of protective treatment by the Community institutions as any other Community industry is.

It is obvious that (additional) duties on Chinese imports would cause substantial harm, not only to a very large number of EU importers who have, over many years, created specific skills to serve the low end market segment, but to an even greater number of consumers as well.

If the EU producers has suffered injury, than it is not a result of Chinese imports but the consequence of their own lack of competitiveness. One of the most important newspaper in Germany – the FAZ Frankfurter Allgemeine Zeitung - pronounced the former president of the Porcelain Association VKI and former CEO of Rosenthal AG in one person as an overpaid breakfast director (see annex STATEMENT IV ENCL 12), who crashed his factory into the abyss!

They have failed to adapt to the changing market conditions and overlooked the fact that tableware and kitchenware, in particular such made from porcelain, has lost its flair of a luxurious good. It is now a merchandise for every day use, which consumers expect to buy at affordable prices at the same 'regular' locations where they usually buy all the other things they buy to satisfy their daily needs (eg. retailers).

During the market of commercial end users - which is our major field – changed their demand more and more to individual shaped items the factories in Europe standardize their productions to quantity giants of simple styled mass production! Actually the restaurant and catering industry are willing to serve events – not only food. Big oval platter for the fish, small dishes for Finger Food, special bowls for the soup of the day... the unique plate for the menu is extinct. Producer and customer have evolved completely contrary.

In the mutual race to the best technology, the companies have forgotten their customers!

Additional duties on Chinese imports ore any other kind of restrictions cannot not help to resolve ore change the problems of the sick EU producers! To take the members of the BHS Tabletop AG which is Bauscher and Schönwald you can see that innovative factories in the high end level are very, very successful. Their products you'll find in every Chinese 5-star Hotel!

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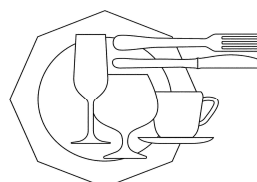
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All it would lead to is that the low end market segment will disappear, thus leaving the consumers with a very unpleasant choice, either to pay more for no discernible additional value, or to do without porcelain dishes in the future.

## 2. European Union producers

The extent of the official file we were given access to does not disclose the factual basis of the Commission's findings as to the representativeness of the Complaint and the criteria for the selection of the sample of Union producers.

For instance, the list of Romanian producers comprises the names of only three manufacturers, even though there are many more, and three major Romanian producers are not listed there, at all.

The production output of the majority of the Union manufacturers mentioned in Annex B.2.1 of the Complaint is destined to cover the premium segment of the market, whereas the output of Romanian producers, in particular the producers mentioned above, is to cover the low price segment of the retail market.

Romanian manufacturers are able to produce at prices, which are comparable to, if not at times cheaper than, the prices of comparable products originating in China.

According to the Commission's respective Note dated 16 February 2012, no producer located in Romania has been proposed to be in the sample. The sample selected comprises 6 Union producers located in Germany, Italy, Poland, Portugal and the United Kingdom.

The below extracts from the Eurostat database show at which average price per kg producers located in the above countries sold ceramic tableware and kitchenware during the year 2010 (all product types referred to in Chapter F of the Complaint fall within CN code 6911)

	CN 6911	EXTRA EUR27	INTRA EUR27	
▪ Germany		€ 9,41	€ 5,65	<b>Enclosure . /01</b>
▪ Italy		€ 7,23	€ 3,71	<b>Enclosure . /02</b>
▪ Poland		€ 3,18	€ 2,56	<b>Enclosure . /03</b>
▪ Portugal		€ 4,78	€ 3,63	<b>Enclosure . /04</b>
▪ United Kingdom		€ 7,79	€ 6,42	<b>Enclosure . /05</b>

whereas Romanian producers were able to sell their products during the same period at

▪ Romania	€ 1,92	<b>€ 1,66</b>	<b>Enclosure . /06</b>
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which is 60% of the cheapest of the countries which have been selected to be in the sample.

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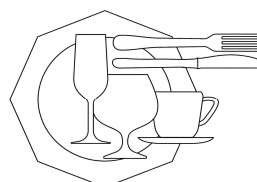
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Producers in Bulgaria and in the Czech Republic are also able to produce at prices, which are not only comparable to, but definitely cheaper than, those paid for imports from China.

According to the Eurostat trade statistics, in 2010 exports were made from

▪ Bulgaria to EXTRA-EUR27	1,352 kt	at	€ 0,74 / kg	Enclosure	./07
▪ Czech Republic to Germany	12,789 kt	at	€ 1,39 / kg	Enclosure	./08

To disregard these producers would result in false and unrealistic conclusions when it comes to determining whether or not the products under investigation are being dumped, or whether or not the injuries the Union producers allege to have suffered are, in fact, the result of dumping, or if these injuries (if any) may have other causes.

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In our opinion the Complainants' vague allegation that they are to fear retaliation if their identities became known cannot be sufficient ground to deprive us of our right to be informed of and to verify and to contend the factual statements they already made or will make. It seems as if these producers pursue a strategy of 'picking raisins from more than one cake' by taking advantage of certain business interests they have on the Chinese market, on the one hand, and pursuing to harm the same Chinese market by moving the Community to impose duties on competing products there from, on the other hand.

Also, it seems to us as if there had been EU producers who did, in fact, not wish to participate in the sample, but were 'insistently' asked by the Commission to agree with their inclusion. There is no information whatsoever on the official file indicating which exact questions the EU producers will be asked to answer once they have been selected to be in the sample.

### 3. Chinese exporting producers

The list of Chinese exporting producers (Annex E.1) supplied by the complaining parties is incomplete and wrong! The given amount of factories shows 39 parties for reference, but 12 of them are only trader without any production – paperwork administrators. This kind of traders are dealing with a lot of different items – porcelain, garden items, metal, household a.s.o. They are mixing different Chinese mainland production's to an own trading assortment, plates from Guangxi Province, mugs from Hunan Province, New Bone China from Hebei Sheng Province and stoneware pizza plates from Henan Sheng Province.

As we told you in the hearing on 16<sup>th</sup> of March the porcelain business in China is a real insider acknowledge! The European mentality cannot understand the Chinese way. We don't know, if it's the same in other industries but in Porcelain we learn this matter since 1955 – and in 57 years we did not know everything. From year to year we know more and more about Porcelain and the about the people, are making this fantastic goods from sand and claim. The kind of Porcelain, the prices, the quality, the packing, and all other details in this goods are very, very different from Province to Province and different from time to time.

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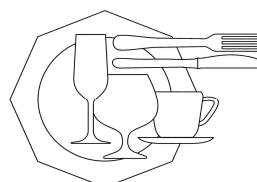
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The commission has to compare China to Europe – from out side a not feasible task. How the Commission copier the labour cots? If Chinese worker is fed up, he go home. After getting hungry, he come back. If the factory has no work, nobody need to work – so no labour costs to pay. This very simple system is completely different to Europe. We have to pay our staff continuously all the year and we have more than 50% different from companies expenditure to the real salary of the employees.

Wash me but don't make me wet... One the one hand we enjoy China to built up there our newest car factories, well sell them toothpaste and hamburger – but we punish them if they can do something better ore cheaper than Europe!

**China ware is a different product of import from China. Founded and named about 4500 years ago in China and since Marco Polo brought this shining items to Europe we tried to copy China to make white porcelain from sand and means 413 years later we fired the first red kind of low temperature earthenware. 304 years later we object dump their concept.**

Apparently, the Commission issued an additional 'Note on a proposed sample of exporting producers from the PRC' on 19 March 2012, and we are surprised that it has not been the Commission who informed us of the issue of this additional Note, even though the Commission has been aware of our existence as an interested party since we made our first filing on 24 February 2012.

The Chinese producers which have been selected to be in the sample are not among those who have returned an Annex A.

The file does not indicate which steps the Commission has taken to select the producers in the sample, nor does it indicate which questions these producers will be asked to answer.

#### **4. European importers**

As we already pointed out in our submission of 8 March 2012, the list of unrelated importers (Annex E.2) supplied by the complaining parties is not complete.

There is an estimate of at least 200 unrelated importers of the products under investigation, only 20 of which are mentioned in Annex E.2.

The file does not indicate which steps the Commission has taken to select the importers to be included in the sample, nor does it indicate which questions these importers will be asked to answer.

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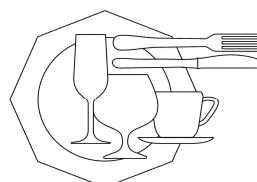
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## 5. Analogue country

In our complaint against Russia from 23.02.2012 we already pointed out that Russia cannot be seen as an appropriate 'market economy third country'.

It is notorious that Russia, as a result of the obvious consolidation of political and economical power in the hands of a very few, accompanied by the exertion of strong influence by politics on economy and vice versa, does not have a functioning market economy as compared with Western standards.

Unlike China, Russia is not an exporter of the products under investigation. On the contrary, as the table on page 3 of Annex F.1.2 of the Complaint clearly shows, exports from Russia dropped to nearly zero in 2010, while imports increased by 50% in terms of weight and almost doubled in terms of value as against the previous year.

To select Russia as a third country would mean to compare two national economies, in which the relevant industries do not play a comparable role, and the said selection therefore is not appropriate to deliver realistic results.

The market situation in Russia is more like it is in Europa, rather than in China. This concerns the market share of the domestic production (30%) as against imports (70%) as well as the prices paid for exports (€ 5,22/kg) as against imports (€ 2,33/kg) in the year 2010 (CN code 6911: tables Annex F.1.2 of the Complaint).

The number of Russian porcelain factories is limited. They produce relatively small quantities of high quality porcelain, which results in relatively high production costs as compared to the Chinese output of multiple quantities of lower quality. The access of Russian producers to raw materials is as different (Russia does not have its own deposits of china clay, the raw material for porcelain) as its production methods are (mechanised production vs. manual production).

The Russian domestic production (similar to the European domestic production) is destined to serve the premium market needs, whereas the Chinese imports cover the low end segment.

Thus, neither the Russian producers nor the products they manufactured can be compared with the producers located in, or the products originating from, China.

Russia, therefore, is not suitable to serve as an analogue third country.

In addition, and as already pointed out by another interested party, the relevant Russian market is protected by non-tariff barriers and thus not open to competition, at least not to a degree which would be required for a market suitable to serve as an analogue third country.

Russia is the biggest gas supplier of the world and their industry is in second place owned by the Government. Energy is one of the most expensive parts of the porcelain production. To compare the energy costs from Russia to China is impossible! We already showed a big amount of facts, that Russia cannot be comparable with China.

We know the European basic regulation needs to compare a third country for comparison but porcelain is very similar to cashmere, caviar, mink ore carnauba wax (lath. Cera Carnauba): Kaolin is a rare natural product and it affects the local industry in a pole position. This kind of commodity-dependent products are not moveable and not comparable!

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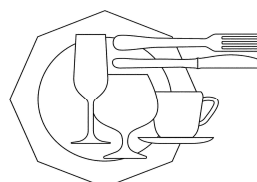
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For this kind of products we need additional solutions in the basic regulation of our Union! If the Commission need to respect the existing – pointless – administration, we repeat our proposal to select Turkey, Thailand ore Malaysia to serve as a market economy third country.

## 6. Normal value and export price

The complaint does not show how normal values and export prices have been computed.

The two tables contained in Annex F.2 refer to the 'average normal value for 2010/2011 in Annex F.1'. The respective tables in Annex F.1, however, are empty and no figures are shown there.

Apparently, the computation of alleged export prices are based on several specific offers and invoices, but none of which is, in fact, attached to the Complaint.

We do have a problem to understand why these calculations are kept a secret, in particular as normal value and export price are the core elements on which any allegation of dumping is to be based. We think that, as part of our right to a fair and non-discriminatory treatment, we are entitled (a) to understand how these figures were computed, (b) to verify the figures, and (c) to respond to the factual aspects on which these computations are based.

Irrespective of whether China as such is to be considered a market economy or not, each of the Chinese producers concerned certainly is a market oriented entrepreneur, and their motive to do business is to make profits, not losses. The mere fact that production in China is cheaper than it is for some of the EU producers is, as such, no ground sufficient to assume that prices for exports from China are dumped.

And irrespective of what is alleged in the Complaint, the information provided by those of the Chinese exporters who have returned an Annex A clearly shows that the prices paid for their products on the domestic market are, by average, equivalent, if not sometimes even lower, than the prices paid for products exported.

It is obvious, therefore, that Chinese export prices are, in fact, not dumped.

## 7. Alleged injury

The decline of the European ceramic industry began almost 30 years ago and is more the result of a general structural problem, rather than the result of imports from China. The Commission has to note that most of the German porcelain factories bankrupted during the time, Chinas porcelain export to the EU lies under the strict import resolution of the old quota!

The German tableware industry, for instance, decreased in terms of production volumes, total sales and number of employments to less than half of its previous size during the period from 1975 to 2002, even though the European market was protected by import quotas until 2004.

- German tableware / decorative ceramic industry 1975-2002

**Enclosure . / 09**

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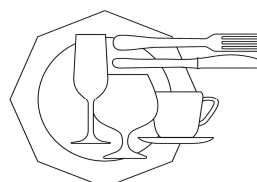
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Some of the EU producers just failed to adapt to changing market conditions. They disregarded the fact that attitudes of consumers have changed and porcelain tableware and kitchenware is, today, seen as a consumer product, and the budgets consumers are prepared to set aside for the purchase of these products are limited.

Instead of reacting appropriately, some of the EU producers prefer to continue to produce for a high end premium market, which is subject to a continuous decrease and will continue to decrease over the next years.

The fact that Chinese imports enjoyed a substantial increase from 75kt in 2002 to 131kt in 2004 (+75%), even though import quotas still existed, and another increase to 362kt in 2005 (+277%), which was partly due to a large number of new member states then joining the European Union in 2004 and partly due to the lifting of import quotas as of 1 January 2005, but decreased to 326kt in 2010 (-11%), just shows that a huge demand for cheaper tableware did exist on the European market, which the EU producers were not willing and/or not capable to satisfy.

- Trade statistics (imports) EUR27 for commodity 6911 (2002 - 2010) **Enclosure ./10**

Since 2005, the quantities of imports from China experienced a similar fluctuation in trade as the EU production did.

The alleged shift of market shares from EU production to imports from China during the five year injury period the Complainants are referring to is not in excess of what is to be considered usual on consumer markets, where decisions to buy are taken more and more on the basis of a comparison of prices, rather than a comparison of quality.

The strict segmentation of the market, and the lack of flexibility of some of the EU producers, can be demonstrated by a comparison of the movement of goods from 'high end' production countries (Germany) and 'low end' production countries (Romania and the Czech Republic), as well as a comparison of the prices paid for these products moved within and to the outside of the European Union as against the average prices paid for imports from China.

The average price paid for all the imports made from China in 2010 was **€ 1,46** per kg.

- Trade statistics (imports) EUR27 for commodity 6911 (2010) **Enclosure ./11**

During the same period (2010), Germany **exported 12.105 tons** to countries outside the European Union at an average price of **€ 9,41** per kg (Enclosure./01)

but **imported**, at the same time, from the Czech Republic **12.789 tons** at a price of **€ 1,39** per kg (Enclosure ./08)

This clearly indicates that some of the EU producers do not actually produce for their local domestic markets, they produce for a premium market segment, wherever this segment may be located, within or outside the European Union, and irrespective of the fact that there is a strong domestic demand for equal quantities of products comparable to those they produce.

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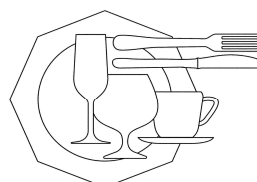
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Also, the fact that there is a considerable number of EU producers which are in a position to offer the products concerned at prices, which are comparable, if not cheaper, to those paid for imports from China, just proves that the injury some of the EU producers allege to have suffered is by no means the result of dumped exports from China, but the result of their own lack of competitiveness.

Apparently, the Community found sufficient grounds to lift the import quotas to which imports from China were subject to until 2005. The question is, are there sufficient grounds to introduce new restrictions now, at a time when imports from China have, in fact, suffered a considerable downturn of more than 11% in quantity over the past years?

The answer is, there are none, but as it often is the case when players on the market lack the flexibility that is needed to cope with a changing environment, instead of restructuring their own business, they prefer to resort to more subtle methods to protect them from competition (Villeroy & Boch/Commission, T-373/10, T-374/10, T-382/10, T-402/10) or try other ways to obstruct their rivals, for instance, by seeking to have import duties imposed on the products of their competitors, as they do in the present case.

## 8. Conclusion

The conclusion of all this is

- that our "made in China" Holst Porcelain is not completely comparable to the quality manufactured by the European Union industry.
- that the forces of the free market inside the EU work freely and undisturbed!
- dumping from Chinese Porcelain Producers did not exist! They sell the same items in their domestic market in similar price level.
- The presented facts of the claim are inadequate and insufficient
- Russia for comparison will not effect a correct score
- there is no direct threat emanating from Chinese imports, because there is a substantial number of European producers are making a real profitable margin in their range of high end products, which are not in contact to any Chinese export.
- there is no injury of European producers suffered from Chinese imports, because European producers serve different items to different markets which are not in direct competition to the segment the Chinese imports seek to satisfy,
- the introduction of new additional duties on Chinese imports would cause the European importers, and all other businesses involved the distribution of Chinese products, to suffer substantial damage, and which European importers are, as a group, by far a larger 'Community industry' than the European producers are,

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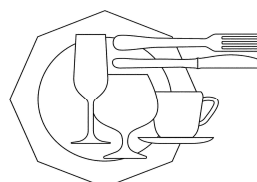
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- the introduction of additional duties on Chinese imports would not help the sick European producers to solve the structural problems, but will lead to the European consumers losing the opportunity to buy porcelain tableware and kitchenware at affordable prices at convenient locations in their neighbourhood.

It is not the responsibility of the Community institutions to protect an industry on the descent in maintaining a pricing structure, which is not a true reflection of free market forces. Justified grounds to impose additional import duties on imports of products under investigation from China, therefore, do not exist.

At last we want to determine that the damage of any antidumping resolutions will be higher as the alleged protection of the market! The economic and financial damage will substantially hit the EU Union painfully. Gladly we give our opinion in a further brief also.

We understand that we shall be given the opportunity to be heard again and comment on the Commission's findings as soon as the investigation has been completed and before a decision is taken.

Kind regards

Holst Porzellan GmbH



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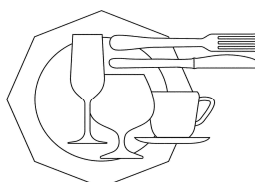
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