

30 July 2026

Trade Remedies Authority
North Gate House
21-23 Valpy Street
Reading
Berkshire
RG1 1AF

via UK Trade Remedies Services

OPEN

Dear Mesdames,
Dear Sirs,

Re: AD0086 – Response to anonymous importer/user’s response to Tronox comments on pre-sampling questionnaires of 17 April 2026
Our client: Tronox Pigment UK Limited (“Applicant”)

We refer to the anonymous UK importer/user’s (“**UK Importer/User**”) response (“**Response**”) to the Applicant’s comments on the pre-sampling questionnaires (“**Comments**”) in the captioned investigation (“**Investigation**”) on UK imports of rutile titanium dioxide (“**Rutile TiO₂**”) originating from China.

The Applicant has already demonstrated extensively why the TRA should reject interested parties’ requests for (1) the exclusion of Rutile TiO₂ that is recommended for use in inks (“**Ink Grade Rutile TiO₂**”) from the product scope of the Investigation; and/or (2) an end-use exemption for Ink Grade Rutile TiO₂ from any anti-dumping duties.¹ Nothing in the UK Importer/User’s Response calls into question that demonstration.

For completeness, the Applicant hereby further rebuts the UK Importer/User’s Response. Specifically, the Applicant demonstrates that the UK Importer/User:

- Conflates a product scope exclusion and an end-use exemption (Section 1).
- Fails to provide evidence in support of its claims (Section 2).
- Makes unfounded allegations that the Applicant misrepresented facts (Section 3).
- Confirms that Ink Grade Rutile TiO₂ cannot be defined and, therefore, cannot be excluded from the scope of the Investigation (Section 4).

¹ Applicant, Comments on pre-sampling questionnaires, 17 April 2026, Section 1.

1. The UK Importer/User conflates product scope exclusion and end-use exemption

1. The UK Importer/User refers to “EU precedent [that] confirms [the] validity of [an] ink exemption.”² The UK Importer/User claims that the Applicant misrepresented the European Commission’s (“**Commission**”) findings by stating that the Commission “rejected differentiated treatment” of Ink Grade TiO₂.³
2. The UK Importer/User’s claim is factually incorrect and conflates the distinction between a product scope exclusion and an end-use exemption. As the Applicant explained, the Commission:
 - Rejected requests to exclude Ink Grade TiO₂ from the scope of the anti-dumping duties. The Commission did so because it found that Ink Grade TiO₂ was like other TiO₂.⁴
 - Granted an end-use exemption, which is subject to strict customs oversight and a license, for imports of Ink Grade TiO₂ that were demonstrably used to produce inks. The Applicant explained that an end-use exemption cannot be granted in the UK because (1) the option does not exist under UK law; and (2) in any event, no UK ink producer has shown that the strict conditions that were met in the EU case are also met in the Investigation.⁵
3. For those reasons, the UK Importer/User’s claim fails.

2. The UK Importer/User fails to provide evidence in support of its claims

4. The UK Importer/User fails to provide evidence in support of its central claims. The core of the Response⁶ consists solely of unsupported assertions concerning the alleged specific performance characteristics of Ink Grade Rutile TiO₂. For example, the UK Importer/User asserts that:⁷
 - “Many general purpose TiO₂ grades do not meet the performance threshold required for inks.”
 - “Chloride-produced grades are technically unsuitable for key ink applications; exhibiting higher abrasiveness resulting in excessive wear on printing press machinery.”
 - “Ink applications are performance-critical and quality-sensitive meaning that substitution from lower-performing grades is not viable.”
5. Mere assertion does not have any probative value, and the UK Importer/User’s claims should be rejected for that reason alone.

² UK Importer/User, Response, points 2 and 7.

³ Applicant, Comments, paras. 25-26.

⁴ Applicant, Comments, paras. 25-26.

⁵ Applicant, Comments, paras. 41-46.

⁶ UK Importer/User, Response, points 1 and 3.

⁷ UK Importer/User, Response, points 1 and 3.

6. In any event, in contrast to the UK Importer/User's unsubstantiated claims, the Applicant provided a wide range of technical datasheets for Rutile TiO₂ grades that demonstrate that the TRA should reject requests to exclude Ink Grade Rutile TiO₂ from the scope of the Investigation.⁸
7. For those reasons, the UK Importer/User's claim fails.
3. **The UK Importer/User makes unfounded and overly redacted allegations of factual inaccuracies**
8. The UK Importer/User makes several unfounded and overly redacted allegations of factual inaccuracies in the Applicant's Comments.
9. First, the UK Importer/User claims to "correct[]" factual inaccuracies" in the Applicant's Comments regarding TiONA 592 and 595, which are two of the Applicant's grades.⁹ The UK Importer/User's claims are fully redacted.
10. As an initial point, the full redaction of the UK Importer/User's claims – in particular because they concern the Applicant's products! – does not meet the TRA's standard for non-confidential summaries.¹⁰ As a matter of procedural fairness, the UK Importer/User's claims should be summarized so that the Applicant can properly rebut them, or, in the alternative, simply rejected.
11. In any event, the Applicant fails to see how it can have presented factual inaccuracies, as its statements regarding TiONA 592 and 595 in the Comments describe the Applicant's *actual sales*. Needless to say, the Applicant knows better than the UK Importer/User what it sold and for which purpose.
12. Second, the UK Importer/User claims that the Applicant mischaracterises available supply on the EU market.¹¹ The facts purportedly supporting these claims are fully redacted so that the Applicant cannot properly exercise its rights of defence. These claims should either be summarized or simply rejected.
13. In any event, the Applicant refers to Kronos's submission of 20 April 2026, which demonstrates that there is ample supply of Ink Grade Rutile TiO₂.¹²
14. Third, the UK Importer/User claims that the Applicant "mischaracterises consumption structure [...] as Kronos 2044 and 2047 are used in inks."¹³ The UK Importer/User misreads the Applicant's Comments, which explicitly state that Kronos 2044 and 2047 are used in inks.¹⁴
15. Fourth, the UK Importer/User claims that anti-dumping duties would "[p]rimarily benefit producers outside the UK" and that this is "contrary to the objective of trade defence

⁸ For instance, the Applicant's Comments contained 34 annexes.

⁹ UK Importer/User, Response, point 5.

¹⁰ TRA, Guidance on Providing confidential information and non-confidential summaries, available [here](#).

¹¹ UK Importer/User, Response, point 4.

¹² Kronos, Comments on product scope, para. 11.

¹³ UK Importer/User, Response, point 4.

¹⁴ Applicant, Comments, para. 15.

measures.”¹⁵ This is factually incorrect: anti-dumping duties would primarily benefit the Applicant, which is precisely the objective of trade defence measures.

16. For those reasons, the UK Importer/User’s claims fail.
4. **The UK Importer/User confirms that Ink Grade Rutile TiO₂ cannot be defined and, therefore, cannot be excluded from the scope of the Investigation**
17. The UK Importer/User claims that there is a distinction (1) between Ink Grade Rutile TiO₂ and a “core ink-grade family;”¹⁶ and (2) between Ink Grade Rutile TiO₂ applications and “high end ink applications.”¹⁷
18. These new, arbitrary, and fuzzy distinctions again confirm, as the Applicant has explained, that Ink Grade Rutile TiO₂ cannot be defined.¹⁸ There is thus no way to distinguish Ink Grade TiO₂ from other Rutile TiO₂ other than by the application in which it is used. An exclusion request for Ink Grade Rutile TiO₂ would thus undermine the effectiveness of any anti-dumping duties the TRA may impose.
19. In other words, the UK Importer/User – like other interested parties that requested an exclusion for Ink Grade Rutile TiO₂ – fails to meet its initial burden of proof, because it fails to properly define Ink Grade Rutile TiO₂ in a way that permits differentiating Ink Grade Rutile TiO₂ from other Rutile TiO₂. To the contrary, the UK Importer/User adds more uncertainty about what Ink Grade Rutile TiO₂ is supposed to be.
20. For those reasons, the UK Importer/User’s claim fails.

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¹⁵ UK Importer/User, Response, point 8.

¹⁶ UK Importer/User, Response, point 4.

¹⁷ UK Importer/User, Response, point 3.

¹⁸ Applicant, Comments, Section 1.1(a).