

24 September 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 – EU enforcement of anti-dumping duties on Chinese TiO₂
Our client: Tronox Pigment UK Limited (“Applicant”)

In its 1 June 2026 submission, the Applicant raised concerns that export prices of rutile titanium dioxide (“**Rutile TiO₂**”) from China to the United Kingdom continued to be at highly injurious price levels since the initiation of the captioned investigation (“**Investigation**”).¹ The Applicant also informed TRA that in each of the five countries that have undertaken anti-dumping investigations into Chinese TiO₂, Chinese TiO₂ producers have sought to evade the effect of anti-dumping duties (“**ADDs**”) through stockpiling. This stockpiling has delayed and undermined the remedial effects of ADDs that have been imposed to protect domestic TiO₂ industries.

Furthermore, the Applicant raised concerns that, following Lomon Billion Group’s (“**LB Group**”) April 2026 acquisition of Venator’s Greatham plant, the UK could be used as a “launch pad” for circumvention of EU ADDs and U.S. Section 301 duties on Chinese TiO₂.²

The Applicant now places on the Investigation record two recent enforcement actions regarding the EU ADDs on Chinese TiO₂ that confirm precisely these concerns:

- First, on 25 August 2026, the European Commission (“**Commission**”) initiated an anti-absorption investigation on EU imports of Chinese TiO₂.³ The underlying request lodged

¹ Applicant, Comments on the importance of swift and strong action, 1 June 2026.

² See LB Group, LB Group completes the acquisition of Venator manufacturing site, 27 April 2026, available at: <https://www.lomonbillions.global/lb-group-completes-the-acquisition-of-venatormanufacturing-site/>.

³ Notice of reopening the anti-dumping investigation concerning imports of titanium dioxide originating in the People’s Republic of China, C/2026/4533, 25 August 2026.

by the EU TiO₂ industry contained evidence that Chinese export prices *decreased* following the imposition of the EU ADDs.⁴

In other words, the Chinese TiO₂ producers are selling through the EU ADDs, thereby continuing to deny the EU TiO₂ industry the protection it needs to survive. This is precisely why the TRA should ensure that any anti-dumping duties it imposes are sufficiently robust from the outset.

- Second, on 18 September 2026, the Commission adopted a regulation subjecting UK exports of TiO₂ to the European Union to surveillance.⁵ This is a highly unusual step for the Commission to take.

As the Commission explains, the purpose of the surveillance is to monitor, and prepare for prompt action against, circumvention of the EU ADDs on Chinese TiO₂ via the United Kingdom following LB Group's acquisition of the Greatham plant.⁶

If the TRA recommends anti-dumping duties that sufficiently robust, the economic rationale for circumventing EU ADDs on Chinese TiO₂ through finishing operations in the United Kingdom would be significantly reduced.

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⁴ Notice of reopening the anti-dumping investigation concerning imports of titanium dioxide originating in the People's Republic of China, C/2026/4533, 25 August 2026, point 4.

⁵ Commission Implementing Regulation (EU) 2026/2064 of 17 September 2026 amending Implementing Regulation (EU) 2025/4 imposing a definitive anti-dumping duty and definitively collecting the provisional duty imposed on imports of titanium dioxide originating in the People's Republic of China.

⁶ Regulation 2026/2064, recitals 4, 5, 11.