Trade Remedies Authority

Trade Remedies Authority

Anti-dumping Investigation:

Application form

When you have completed this form, indicate the **confidentiality** of this document by placing an X in the relevant box below:

☐ Confidential
☒ Non-Confidential – will be made publicly available

Please note that you will have to provide **two copies of your response** – a **Confidential** and a **Non-Confidential version.** Both copies should be returned to the TRA using the Trade Remedies Service (www.trade-remedies.service.gov.uk).

Contents

Instructions

About us

The Trade Remedies Authority (TRA) is an arm length body of the UK's Department for Business and Trade. It carries out trade remedies investigations to find out if a new trade measure may be needed to counter dumped or subsidised imports or a sudden surge in imports.

The legislative framework that the TRA operates under is found in the Taxation (Cross-border Trade) Act 2018) ('the Act') and the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 ('the Regulations').

About you

You can apply to us to open an investigation if you are a UK producer of goods or a representative of a UK producer and you have evidence of unfair trade practices relating to the dumping or subsidy of goods imported into the UK.

You must provide sufficient evidence of dumped or subsidised goods being imported in the UK and that the dumped or subsidised imports have caused or are causing injury to the UK industry (in compliance with the Act)

You can find out more about our remit and how we work by reading our guidance on trade remedies investigations.

About this form

Complete this form and the relevant annexes if you want to apply for a new anti-dumping or subsidy investigation. This form will give us the information we need to decide whether to initiate an investigation into your concerns. You can find more information on how we assess applications in our guidance.

You must submit your application online through the Trade Remedies Service (https://www.trade-remedies.service.gov.uk). When you submit your application, you must also submit a non-confidential version (including the annexes) which doesn't contain any data you think is sensitive (for instance, commercial data about your company), as we are required to publish a copy of the application form. You can find out more about what can be considered confidential and how to prepare a non-confidential version of your documents in our guidance.

If you are considering submitting an application and would like to discuss it with someone first, please email contact@traderemedies.gov.uk. You can find more on completing this application in our Pre-Application Office and application assessment guidance.

If you have any issues or queries about using the Trade Remedies Service, please email help@traderemedies.gov.uk.

What happens next

Once you have completed this application form you can share a confidential version with the Pre-Application Office to get feedback before you formally submit your application. When you formally submit your application, you will need to submit a confidential and a non-confidential version of this form. Please upload these through our Trade Remedies Service at www.trade-remedies.service.gov.uk.

Once you have done this:

- you will receive an email confirming the documents have been uploaded successfully;
- the assessor(s) of your application will contact you if further information is required; and
- the assessor(s) of your application may contact you to arrange a visit to verify the information contained in your responses.

How to complete this application form

Please read and follow all the instructions carefully. You will need to provide evidence to support your concerns. You may need to attach supporting documents in appendices to supplement the answers you give.

Please also note the following points:

- Try to avoid leaving any questions blank. If the question isn't relevant to you, please try to explain why.
- If the answer to a question is "zero", "no", "none" or "not applicable", please write this rather than leaving the answer blank.
- If you feel you can't present the information as requested, please contact the Pre-Application Office by emailing contact@traderemedies.gov.uk.
- If there is not enough space in any part of the application form to provide a full answer, please attach appendices. Please ensure that any attachments are given a corresponding appendix reference in the title of the document and that these are referenced in the boxes provided.
- If you include any documents not in English, please provide an English translation.
- Provide all dates in the format DD/MM/YYYY (e.g. 23/05/2019).

- For all numerical figures, where appropriate please express every third number with a comma (e.g. ‘1,300’ for one-thousand three hundred, ‘1,300,000’ for one million and three-hundred thousand).
- Limit all sales/currency/income figures to two decimal places and use the appropriate currency symbol (e.g. £1,300.00).
- All figures should be reported net of tax unless otherwise stated.
- For definitions of the incoterms used throughout this document, please visit the International Chamber of Commerce.

A. About the Goods

This section of the application form is about the imported goods you want us to investigate. These imported goods will be referred simply to as 'the goods'.

You can only ask us to investigate imported goods if you (or the industry you represent) produce 'like goods'. Like goods are defined as goods which are similar to the goods under investigation in all respects or have characteristics which closely resemble them. When we decide what are like goods, we will consider the following non-exhaustive list of criteria:

- physical likeness, such as physical characteristics
- commercial likeness, including competition and distribution channels
- functional likeness, such as end-use or if the goods can be substituted for each other
- similarities in production, such as method and inputs
- other relevant characteristics

A.1. The Imported Goods

1. Describe the imported goods you are concerned about (if possible, please attach digital versions of images, brochures, catalogues, etc which show the goods in question).

A. Rutile titanium dioxide

*The product under investigation is rutile titanium dioxide ("**Rutile TiO2**"):*

- *In all forms;*
- *Imported as titanium oxides or in pigments and preparations based on titanium dioxide;*
- *Containing a minimum of 80% by weight of titanium dioxide calculated on the dry matter; and*
- *Having all types of particle sizes.*

Rutile TiO2 is classified under Chemical Abstracts Service Registry Numbers (CAS RN) 12065-65-5 and 13463-67-7.

Rutile TiO2 is an inorganic white pigment used to provide brightness, opacity, and durability in coatings, plastics, paper, and many other industrial and consumer products. It is a white solid that is insoluble in water, although mineral forms can appear black. Rutile TiO2 is typically sold in the form of a powder.

B. Anatase titanium dioxide excluded

*Rutile TiO2 has rutile crystal morphology. TiO2 can also be produced with anatase crystal morphology ("**Anatase TiO2**"). Anatase TiO2 is excluded from the scope of this application ("**Application**").*

Anatase TiO2 is used in specialty applications in the pharmaceutical, food, and cosmetics industries and to make ultrafine TiO2 products, which are non-pigmentary produces with specialty chemical end uses like catalysts for environmental solutions, or photocatalytic applications.

*To the best of Tronox Pigment UK Limited's ("**Applicant**") knowledge, the volume of Anatase TiO2 sold on the UK market is [<5]% of total TiO2 (i.e., Rutile TiO2 and Anatase TiO2) consumption.*[1]

Appendix reference: *Annex A.1 – Tronox brochures*

2. Explain where the imported goods you are concerned about are being exported from.

*The Applicant is concerned about Rutile TiO2 exported from the People's Republic of China ("**PRC**").*

Appendix reference: N/A

3. Provide the tariff classification(s) for the imported goods.

Imported Rutile TiO2 is or can be classified under UK tariff codes:

- *2823 00 00 – Titanium oxides. This tariff code is typically used for unfinished (or untreated) Rutile TiO2.*[2]
- *3206 11 00 – Pigments and preparations based on titanium dioxide containing 80% or more by weight of TiO2 calculated on the dry matter. This tariff code is typically used for finished (or treated) Rutile TiO2.*[3]

Imports under tariff code 2823 00 00 account for [3-10]% of imports under both tariff codes.[4]

---

1 *[Sensitive information removed – Applicant's market knowledge and Applicant's business operations].*

2 *Imported Rutile TiO2 is or can be classified under all 10-digit tariff codes (i.e., 2823 00 00 10, 2823 00 00 30, 2823 00 00 40, 2823 00 00 80, 2823 00 00 83, and 2823 00 00 85).*

3 *Imported Rutile TiO2 is or can be classified under all 10-digit tariff codes (i.e., 3206 11 00 10, 3206 11 00 30, 3206 11 80, and 3206 11 00 85).*

4 *See Import statistics [Sensitive in its entirety – These statistics were obtained from a trade statistics service provider. Disclosure would violate third-party copyrights],* ***Annex A.1.3****, tab* ***2. Split****.*

Imported Anatase TiO2 is or can be classified under the same tariff codes. To the best of the Applicant's knowledge, almost all imports into the UK under tariff code 2823 00 00 currently are of Anatase TiO2. In contrast, almost all imports under tariff code 3206 11 00 are of Rutile TiO2. As Rutile base pigment[5] can be imported under tariff code 2823 00 00, it is important that tariff code 2823 00 00 is included.

Appendix reference: Annex A.1.3 – Import statistics [Sensitive in its entirety – These statistics were obtained from a trade statistics service provider. Disclosure would violate third-party copyrights]

4. Give details regarding whether the imported goods are currently subject to any anti-dumping/countervailing/safeguard measures or ongoing investigations in other countries.

*The aggressive dumping practices of Chinese TiO2 producers has forced non-Chinese TiO2 industries to apply for anti-dumping duties in Brazil,[6] the Eurasian Economic Union,[7] the European Union ("**EU**"),[8] India,[9] and Saudi Arabia.[10] All these investigating authorities confirmed that Chinese TiO2 was being dumped and that dumped imports cause material injury to the domestic TiO2 industries.*

*The currently applicable anti-dumping measures are set out in **Table 1** below.*

Table 1 – Currently applicable anti-dumping measures on Chinese TiO2

Chinese producer	***Brazil (USD/MT)***	***EU (€/MT)***	***India (USD/MT)***	***Saudi Arabia (% or USD/MT)***	***Eurasian Economic Union (%)***
LB Group	*$1,159*	*€740*	*$460*	*31% (≥$773/MT)*	*14%*

5 *See **Section A.3.4**.*
6 *Resolução GECEX Nº 802 de 23 de Outubro de 2025, Aplica direito antidumping definitivo, por um prazo de até cinco anos, às importações brasileiras de pigmentos de dióxido de titânio, do tipo rutilo, originárias da China.*
7 *Decision of Board of the Eurasian Economic Commission of October 14, 2025 No. 96 about the application of an anti-dumping measure by means of introduction of an anti-dumping duty concerning titanium dioxide coming from People's Republic of China and imported into the customs area of the Eurasian Economic Union.*
8 *Commission Implementing Regulation (EU) 2025/4 of 17 December 2024 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, OJ L, 2025/4, 9.1.2025.*
9 *F. No. 6/03/2024-DGTR, Government of India, Ministry of Commerce & Industry, Department of Commerce, Directorate General of Trade Remedies, Case No. AD (OI)-03/2024: Final findings in the anti-dumping investigation concerning imports of "Titanium dioxide" originating in or exported from China PR.*
10 *Saudi General Authority for Foreign Trade, Notice No. 10, AD-24-2, Imposing anti-dumping duties on the imports of Titanium Dioxide TiO2.*

Anhui Gold Star Group	*$1,149*	*€250*	*$609*	*29% (≥$667/MT)*	*16%*
Shandong Group	*$1,224*	*€640*	*$563*	*19% (≥$427/MT)*	*16%*
Pangang	*$1,224*	*€640*	*$510*	*37% (≥$827/MT)*	*16%*
Yibin	*$1,224*	*€640*	*$510*	*32% (≥$827/MT)*	*16%*
Non-sampled cooperating producers	*$1,224*	*€640*	*$510*	*45% (≥$1,173/MT)*	*16%*
All other producers	*$1,268*	*€740*	*$681*	*45% (≥$1,173/MT)*	*16%*

In addition, the U.S. TiO2 industry is currently protected from dumped Chinese TiO2 by the various tariffs imposed by the United States on Chinese imports.

Finally, the Applicant is aware of [Sensitive information removed – Applicant's market knowledge].

Appendix reference: N/A

A.2. The Like Goods

1. Describe the like goods produced by the UK industry (if possible, attach digital versions of images, brochures, catalogues, etc).

*The Rutile TiO2 produced by the UK TiO2 industry is as described in **Section A.1.1**.*

Appendix reference: N/A

A.3. Comparability Between the Goods

1. Explain how the like goods produced by the UK industry are like the imported goods. Please cover the following aspects of the goods.

   The physical, technical, chemical and any other characteristics that describe the goods – explain any differences:

Chinese Rutile TiO2 is like Rutile TiO2 produced by the UK industry: there is no practical difference between the physical, technical, chemical, or any other characteristics of UK Rutile TiO2 and Chinese Rutile TiO2. In fact, Rutile TiO2 is essentially a commodity product, so that there are no relevant differences between Rutile TiO2 produced in different countries. Rather, Rutile TiO2 from all origins is

highly substitutable. Therefore, UK Rutile TiO2 directly competes with Chinese Rutile TiO2.

*As an initial point, Rutile TiO2 can be produced using either the sulphate method or the chloride method.[11] There is no difference in the physical, technical, chemical, or any other characteristics of Rutile TiO2 produced using the sulphate method or via the chloride method. This was already established by investigating authorities in other jurisdictions. For example, the European Commission ("**Commission**") stated that it "could not establish that there were such differences in physical, chemical, or technical characteristics between the products derived from the two production processes."[12] The Commission also confirmed that "both chloride and sulphate process TiO2 are used in the same industries, sometimes even in the same applications."[13]*

The assessment below sets out the physical, technical, chemical, end-use, and market characteristics of Rutile TiO2 and demonstrates that UK Rutile TiO2 and Chinese Rutile TiO2 are like products:

***A. Physical and technical characteristics**: UK Rutile TiO2 and Chinese Rutile TiO2, have the same physical and technical characteristics. Rutile TiO2 is a white solid, typically sold in the form of a powder. UK Rutile TiO2 and Chinese Rutile TiO2 both contain a minimum of 80% by weight of TiO2, calculated on a dry basis. UK Rutile TiO2 and Chinese Rutile TiO2 can have different particle sizes, and can be simply calcined, calcined and ground, or calcined, ground, and micronized.*

***B. Chemical characteristics**: Rutile TiO2 is an inorganic chemical compound. The core chemical composition of Rutile TiO2 is the minimum of 80% by weight of TiO2.[14] Pure Rutile TiO2 (produced using the sulphate or chloride methods), which is known as 'base pigment', is in most cases finished. The finishing operations are where different grades of Rutile TiO2 are created. That is because the finishing operations determine the product characteristics of individual Rutile TiO2 grades, as well as the size and distribution of the particles.[15] There is no difference between UK Rutile TiO2 and Chinese Rutile TiO2 in this regard.*

***C. End use**: Rutile TiO2 is a critical input for the UK industry. UK Rutile TiO2 and Chinese Rutile TiO2 are used in the same range of applications, of which paints and coatings and plastics account for most consumption. More than [70-90]% of TiO2 is used to produce paints and coatings and plastics.*

---

11 *See **Section A.3.4** below.*

12 *See recital 70 to Commission Implementing Regulation (EU) 2024/1923 of 10 July 2024 imposing a provisional anti-dumping duty on imports of titanium dioxide originating in the People's Republic of China, OJ L, 2024/1923, 11.7.2024.*

13 *See recital 77 to Commission Implementing Regulation (EU) 2025/4 of 17 December 2024 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, OJ L, 2025/4, 9.1.2025.*

14 *The core chemical composition is unaffected by the production method.*

15 *See **Section A.3.4 below**.*

Rutile TiO2 is used ubiquitously to give paints and coating durability, resistance to corrosion and UV protection. It is critical in infrastructure, industrial, marine, automotive, construction, consumer, and military applications.

*Further, as explained further in **Section G,** Rutile TiO2 is strategically important because it sits at the centre of several high-priority industrial value chains. Rutile TiO2 production using the chloride method is part of the supply chain for titanium metal, a critical material for the aerospace and defence industry. Specifically, titanium metal is widely used in airframes, engines, landing gear, helicopter rotors and missile systems.*

In addition, Rutile TiO2 production uses substantial amounts of chlorine, which is important for the financial viability of the UK's chlor-alkali industry. That is because chlorine and caustic soda are produced together at chlor-alkali plants in a fixed ratio known as the electrochemical unit (or ECU).[16] Both chlorine and caustic soda have many end-uses critical to the UK's industrial resilience – in water purification, pulp and paper production, and soaps and detergents to name just three examples. Without a robust domestic Rutile TiO2 industry, chlorine demand will fall. Since chlorine and caustic soda are co-produced in fixed ratios, mismatches between chemical end-use demand (e.g. falling production of Rutile TiO2) can create imbalance, meaning chlorine becomes "the weak side" of the production balance.

***D. Consumer and market perception:** In the UK market, UK Rutile TiO2 and Chinese Rutile TiO2 are generally regarded as highly interchangeable.*

Appendix reference: N/A

2. If the goods can be subdivided into separate models – provide details about each of the models, such as their product literature and technical documentation:

*See **Section A.3.1**.*

*Rutile TiO2 for high-volume applications like paints, coatings, and plastics is essentially a commodity product. Minor variations to each product or "grades" are created in the "finishing" stage of production which, as explained in **Section A.3.4**, does not account for a material share in costs.*

Appendix reference: N/A

3. Give the tariff classification of the goods (customs commodity code) – if there are multiple models, provide the customs commodity code for each model:

[16] *In chlor-alkali production, the ECU represents the fixed stoichiometric output of the electrolyzer, meaning that for every unit of chlorine produced the plant simultaneously generates a corresponding, chemically linked amount of caustic soda (and hydrogen). Production rates and economics are governed by this unavoidable ratio.*

*See **Section A.1.3**.*
Appendix reference: N/A

4. Summarise the production process of the goods in the UK and in the exporting country/countries. Make sure you explain if there are different production processes within the UK and/or the exporting country/countries concerned:

There are two production methods for Rutile TiO2: the chloride method and the sulphate method. In the UK, only the chloride method is used.[17] In China, both the chloride method and the sulphate method are practiced. The chloride method is regarded as more technologically sophisticated and environmentally friendly than the sulphate method.

Both production methods create a "base pigment"[18] that is then "finished" with surface treatments. The process for "finishing" of Rutile TiO2, whether produced via the chloride method or the sulphate method, is substantially identical.

In Section A, the Applicant explains the production process of Rutile TiO2 using the chloride method. In Section B, the Applicant describes the sulphate method for producing Rutile TiO2. Finally, in Section C, the Applicant explains that there is no difference between the production methods in the UK and in the PRC.

A. Chloride production method

The primary raw material known as "feedstock" is either TiO2-containing minerals that are directly fed into the production process after mining or one of the TiO2 minerals, ilmenite, which is first "upgraded" in an intermediary step such as smelting to increase the TiO2 content and then fed into the process. Ilmenite and rutile are the two minerals fed directly into the process. Chloride slag is a feedstock material made by smelting ilmenite to increase the TiO2 content.

The Tronox Group, of which the Applicant forms part, is a vertically integrated producer of Rutile TiO2. [Sensitive information removed – Applicant's business operations].

*The **chloride method** uses chlorine as a process chemical to produce Rutile TiO2.*

- *The first step of the chloride method is chlorination. It entails chlorinating titanium feedstock materials in a fluidized bed reactor to produce titanium tetrachloride ("**TiCl4**"). In the fluidized bed, chlorine and petroleum coke (as a reductant) are used to initiate an exothermic chemical reaction. CO2, heat, and solid waste are released, and the resultant titanium tetrachloride gas is cooled during condensation.*

[17] *[Sensitive information removed – Applicant's business operations]. See **Section C.1** below.*
[18] *In the sulphate method, "base pigment" is referred to as "calciner discharge" but it is substantially the same as "base pigment" produced in the chloride method.*

- *The second step is oxidation. The cooled TiCl4 gas is reheated and reacted with oxygen to produce Rutile TiO2 and chlorine. The chlorine produced in this second phase is recycled and used again in the chlorination step. The material produced in the oxidation step is the "base pigment" which is a white powder ready for "finishing."*
- *The third and last step is finishing.[19] The "base pigment" is finished through a series of filtering, drying, micronizing and surface treating steps before being packaged and sold. The surface treatments or surfactants consist of aluminium oxide (Al2O3), zirconium dioxide (ZrO2), silica oxide (SiO2), and phosphorus pentoxide (P2O5).*

  The cost of the finishing operations is [Sensitive information removed – Applicant's business operations]. However, the finishing operations are where different grades of Rutile TiO2 are created. That is because the finishing operations determine the product characteristics of individual Rutile TiO2 grades, as well as the size and distribution of the particles. Surface treatments, particle size, and distribution are essential for determining the characteristics of different Rutile TiO2 grades for better performance in different applications. For example, alumina or silica layers protect dye from ultraviolet degradation and chemical corrosion and are therefore used to enhance durability in outdoor applications. Surface treatments also reduce the tendency of particles to clump, ensuring better light dispersion in coating formulations.

The finished Rutile TiO2 is packed in either 1,000kg RBC 'big bags' or 25kg paper sacks for sale.

As described below, the "finishing" of Rutile TiO2 – which is where product or "grade" differentiation occurs – is substantially identical for both chloride and sulphate methods of production.

B. Sulphate production method

*The **sulphate method** uses sulphuric acid as the process chemical to produce Rutile TiO2. The sulphate method uses lower grade feedstock materials – that is, feedstock materials with a lower TiO2 content, primarily ilmenite. Because the feedstock material has a lower TiO2 content – and, hence, a higher amount of waste material – it produces substantially more solid waste than the chloride method.*

In the sulphate method, the feedstock material is digested with sulfuric acid. The solution is clarified through settling and filtration. The resulting solution, known as the mother liquor, is concentrated and subjected to steam. About 95% of the titanium in the mother liquor is hydrolysed to titanium hydrate or meta titanic acid, which is collected on a filter and washed. The final filter cake is calcined at 900-1,000°C to form TiO2. The TiO2 is cooled, dry milled, and dispersed in water. Rutile seed crystals are added either to the mother liquor or prior to calcination. Coarse particles of Rutile TiO2 are then separated, re-ground and filtered. The filter cake is dried in a rotary

[19] *For the avoidance of doubt, finished Rutile TiO2 is Rutile TiO2 that is within the scope of this Application.*

steam dryer and pulverized to produce "calciner discharge" which is substantially identical to the "base pigment" produced by oxidation in the chloride method.

The calciner discharge is then "finished" using substantially the identical finishing process described above for base pigment produced through the chloride method.

C. Identical production process in the UK and in the PRC

*There is no difference in the production process for Rutile TiO2 produced in the UK using the chloride method versus the PRC (or anywhere else in the world). There is also no difference in the production process for Rutile TiO2 produced in the PRC using the sulphate method versus anywhere else in the world. Currently, the majority of Chinese Rutile TiO2 is produced using the sulphate method. However, the Commission flagged that "its investigation has shown that the Chinese industry is committed to accelerate the transition from the sulphate method to the chloride method to produce TiO2."[20] The largest Chinese TiO2 producer, Lomon Billion Group ("**LB Group**") produces Rutile TiO2 using both the sulphate and chloride methods.*

Appendix reference: Annex A.3.4 – China production per method

5. Provide a general description of the UK market for the goods including the nature and conditions of competition within the overall market. In your answer please refer to:

- general users/consumers/customers;
- market segmentation;
- government regulation or tax;
- distribution and marketing (for example, how is the product sold and is quality or price the deciding factor);
- the nature of competition within the overall market;
- the degree of price sensitivity;
- the trends and drivers of demand, including causes of demand fluctuations and any factors contributing to overall market growth or decline;
- developments in technology affecting the characteristics, demand or the production process of the goods;

[20] *See recital 83 to Commission Implementing Regulation (EU) 2025/4 of 17 December 2024 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, OJ L, 2025/4, 9.1.2025.*

- other commercially significant goods which could be substituted for your goods and the goods being imported into the UK; and
- any other factors that influence the market.

After making some general comments (Section A), the Applicant addresses the requested aspects of the UK market for Rutile TiO2 (Sections B-K).

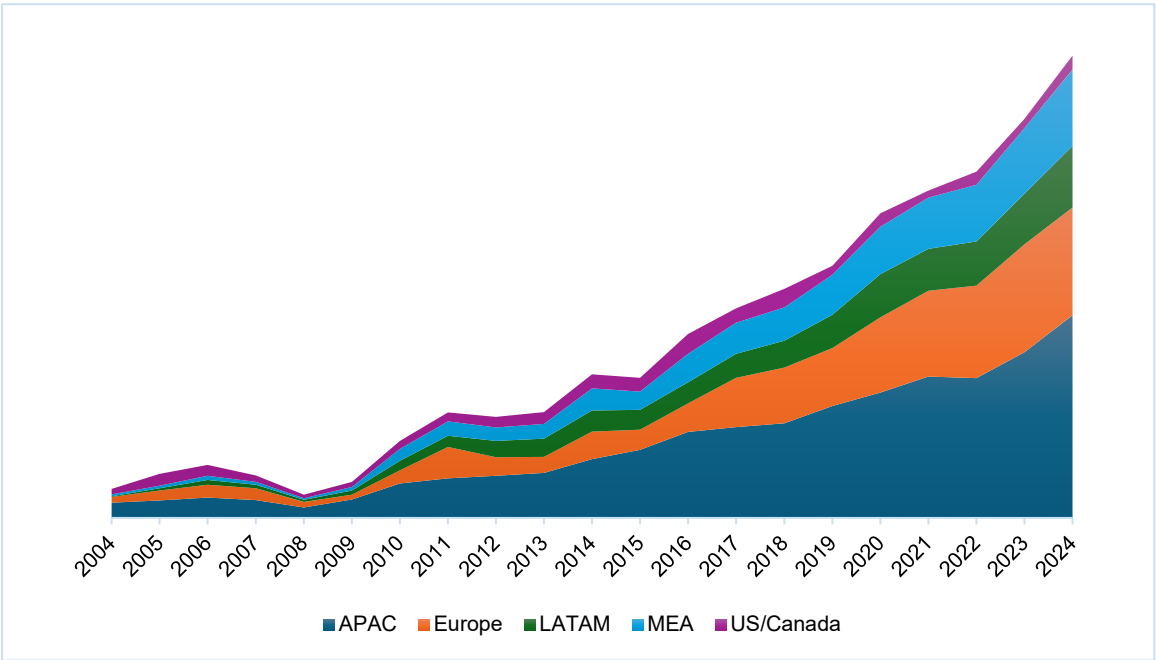
A. General comments on the UK market for Rutile TiO2

The UK market for Rutile TiO2 is a mature market in which there has historically been fair competition between imported Rutile TiO2 from various countries as well as UK-produced Rutile TiO2.

*As from the late 2000s, Chinese producers have slowly started penetrating the UK market because of the PRC's rapid expansion of TiO2 production capacity as of the 1990s. As explained in detail in **Section F.2**, the capacities built by the PRC in the Chinese TiO2 industry is staggering, even in comparison to other chemical industries. To give but one example: in 2005, Chinese Rutile TiO2 production capacity accounted for ~10% of global capacity. In 2024, this was a whopping ~55%.*

As a result of huge Chinese production overcapacities in Rutile TiO2, in combination with high fixed costs that require high capacity utilization rates, it is no surprise that Chinese Rutile TiO2 producers focused on exports to get rid of their oversupply. Figure 1 shows the exponential growth of Chinese TiO2 exports globally since 2004.

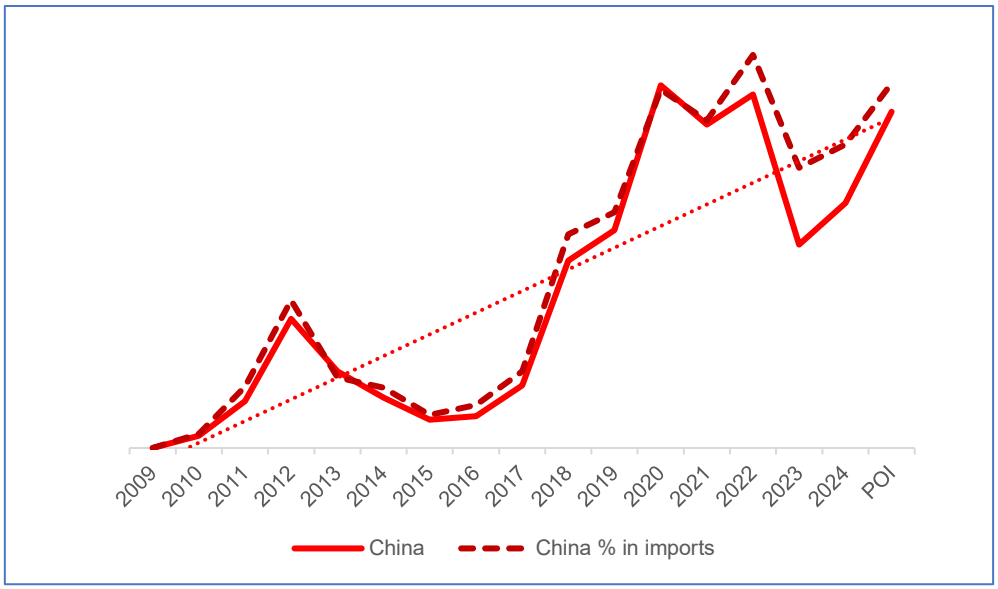
Figure 1 - Growth in Chinese global TiO2 exports since 2004 (MT)[21]



[21] *Source: China Customs via S&P Global.*

Export markets in developed countries, such as the UK, were of particular appeal. As Figure 2 shows, Chinese Rutile TiO2 producers steadily increased their sales to the UK market from 2009 to date, thereby disrupting the market. Over the course of the years, armed with their familiar playbook of using injuriously low prices, Chinese Rutile TiO2 producers managed to displace fairly traded imports, with more than one in three tons of imported Rutile TiO2 today being Chinese.

Figure 2 - Yearly UK import volumes of Chine Rutile TiO2 (MT and %)[22]



B. General users/consumers/customers

*See **Section A.3.1**. As noted, [70-90]% of Rutile TiO2 is used to produce paints and coatings and plastics. The remainder is used in a wide range of applications. The large consumers in the paints and coatings and plastics industries are typically large multinational producers.*

C. Market segmentation

The UK market for TiO2 is segmented based on the end-use industry / application:

- *Paints and coatings: [50-70]% of demand for Rutile TiO2 comes from the paints and coatings industry, with about two-thirds used in decorative coatings and one-third in various industrial coatings.*
- *Plastics: [20-40]% of demand for Rutile TiO2 comes from the plastics industry. Almost all thermosetting and thermoplastic plastics use Rutile TiO2. The main plastics products that use Rutile TiO2 are:*
    - *Masterbatch, which are colour concentrates. The masterbatch industry disperses Rutile TiO2 into polymers (e.g., polyethylene, polypropylene) and sells the masterbatch to plastics fabricators.*

[22] *Source: Import statistics [Sensitive in its entirety – These statistics were obtained from a trade statistics service provider. Disclosure would violate third-party copyrights], **Annex A.1.3**.*

- *PVC products. Rutile TiO2 is used, in particular, in window frames and doors for construction but also in flexible PVC such as some flooring applications.*

- *Other applications: the remaining Rutile TiO2 is used in paper, rubber, ink, cosmetic and pharmaceutical applications.*

D. Government regulation and tax

In the UK, Rutile TiO2 producers are required to adhere to strict safety and environmental regulations, such as REACH and UK-specific chemical safety regulations.

Waste disposal, in particular, is very costly as Rutile TiO2 production generates very large volumes of solid waste. Production waste is comprised of a water-rich filter cake and sluice water. The ratio of waste/product is [Sensitive information removed – Applicant's business operations]. As the Applicant's waste is [Sensitive information removed – Applicant's business operations].[23]

Another driver of regulatory cost is the cost of CO2 per MT of Rutile TiO2 produced, as the Applicant is a party of the UK emissions trading scheme and the production of Rutile TiO2 generates significant volumes of CO2 emissions.

In the PRC, safety and environmental regulations, including those on waste, are much more lenient than those implemented in the UK and, in addition, they are not strictly enforced.

UK imports of Rutile TiO2 under tariff code 3206 11 are subject to a third country import duty of 6%. This also applies to imports the case for imports from the PRC. UK imports of Rutile TiO2 under tariff code 2823 00 are not subject to an import duty.

E. Distribution and sales

The distribution and sales of Rutile TiO2 follows a global commodity model, characterised by high substitutability across origins and production methods.

Large industrial customers, such as paints and coatings producers and plastics producers are typically served through direct contractual arrangements, often under long-term agreements to ensure supply stability. Smaller customers are reached via regional distributors and trading companies that manage logistics, warehousing, and technical support.

[Sensitive information removed – Applicant's business operations].

F. Competition within the overall market

As noted in ***Section A****, there has traditionally been a fair amount of direct competition on the mature UK market for Rutile TiO2 between fairly traded imports of Rutile TiO2 and UK Rutile TiO2.*

[23] *See* ***Section C.1****.*

However, the rise in dumped Chinese Rutile TiO2 imports has upset the UK market as Chinese Rutile TiO2 producers seek to grab market share by pushing sales through injuriously low prices (in the exact same way they did in Brazil, the EU, India, or Saudi Arabia).

G. Pricing and price sensitivity

Prices are determined by the forces of supply and demand, with numerous competitors offering similar products that are largely interchangeable.

Market prices can be influenced by fluctuations in the price of key raw materials and energy, as well as in the significant cost of waste disposal. Prices can also be affected by capacity utilization rates, as producing Rutile TiO2 requires high fixed costs.

*However, given that Rutile TiO2 is traded globally, fluctuations in costs are overcome by imbalances in supply/demand. That is because the price sensitivity for Rutile TiO2 is high: price is the key factor in any customer's choice to buy Rutile TiO2, particularly where there is a large price differential. For that reason, customers often request quotes from multiple Rutile TiO2 producers. The PRC's decision to create massive production overcapacities in Rutile TiO2 has resulted in an oversupply, exacerbated by the closure of its largest export markets – particularly India, Brazil, and the EU – due to trade protection measures implemented in the last 12 months, which will inevitably exacerbate the dire financial condition of UK Rutile TiO2 producers as products are diverted from these markets to the UK. Thus, as detailed in **Section F.1**, the single driver of prices on the UK market is currently the ever-lower dumped prices of Chinese Rutile TiO2.*

Prices of Rutile TiO2 are substantially the same regardless of the type of customer, although there can be minor variations in price based primarily on quantity. Large-volume purchasers such as large-scale architectural coatings companies or masterbatch producers can and do enjoy modest price discounts compared to smaller users.

Other factors that play a much less important role in the buying decision are quality, performance, versatility and security of supply.

H. Trends and drivers of demand

The UK market for Rutile TiO2 is set to grow in the coming decade. The primary drivers for this growth are:

- *Expansion in the construction industry: both residential and non-residential infrastructure needs are set to increase because of urbanisation and industrialisation.*
- *Growing adoption of architectural paints and coatings: what sets these paints and coatings apart is that they are both UV- and water-resistant.*

I. Developments in technology affecting the characteristics, demand or the production process

The Rutile TiO2 industry is a mature industry with no fundamental technological innovation. The last significant innovation in Rutile TiO2 production technology occurred in the 1960s when the chloride method for producing Rutile TiO2 became broadly commercialised.

Since then, improvements in process technology and finished products have been incremental and spread on a global basis. These developments have not materially altered the characteristics, demand, or production process of Rutile TiO2.

J. Other commercially significant goods which could be substituted for the Applicant's goods and the imported goods

Rutile TiO2 is produced in other jurisdictions, mainly the EU, the United States, Mexico, India, Brazil, Australia, Saudi Arabia, and Japan. This Rutile TiO2 is a substitute for UK Rutile TiO2 and Chinese Rutile TiO2.

Rutile TiO2 was introduced into the market as the alternative to lead oxide, which suffered several health-related concerns that ultimately resulted in the banning of lead-based paints and coatings. There is, at present, no substitute for Rutile TiO2 on the global market that provides similar efficacy at similar cost.

K. Any other factors that influence the market

N/A.

Appendix reference: N/A

6. We give goods in our investigations Product Control Numbers (PCNs) which are identifiers unique to our work and are created on the basis of the main characteristics differentiating the goods from other goods. We use PCNs to allow comparison between products made by domestic and foreign producers. The accuracy of the TRA's PCN structure is directly proportionate to information supplied by the applicant. If the goods concerned covers a range of goods with different characteristics that would affect comparability:

- Please describe the key physical characteristics that have a consequential and material effect on prices, with the list of characteristics going from most to least consequential
- Please provide evidence to substantiate that these physical characteristics have a consequential and material effect on prices. This evidence could be in reference to specific unit costs, if those costs effect price comparability
- Use this information to delineate between models of not only the goods produced by the UK industry, but by the exporting producers, giving the information requested in the subsequent sections in refence to each model rather the goods category as a whole. The annex will indicate where information is being asked for on an individual model basis.

- If you already have a view on a PCN structure, please propose that here.

*The Applicant proposes the product control numbers ("**PCNs**") set out in **Table 2**. These PCNs mirror the PCNs used by the Commission in the EU anti-dumping investigation on Chinese TiO2,[24] adjusted for the fact that the Application concerns only Rutile TiO2.[25]*

Table 2 – Proposed product control numbers

Field description	*Product properties*	*PCN value*
Production method	*Produced using sulphate method*	*S*
	Produced using chloride method	*C*
TiO2 content per weight, calculated on the dry matter	*≥80 to <98%*	*800*
	≥98 to <99.5%	*980*
	≥99.5%	*995*

Appendix reference: N/A

B. About the Application

Individuals or groupings of companies, individuals and trade bodies can all be applicants. Generally, an industry that is concerned about a set of imported goods should make only one application to us for an investigation. When we assess your application, we will consider information about all the companies which make up the group that is applying. When you are answering questions about the goods you produce, please include information about the goods produced by all the companies and individuals who are submitting this application.

B.1. Applicant Information

Name of Applicant

*Tronox Pigment UK Limited ("**Tronox**") is the Applicant.*

Tronox is a manufacturer, seller, and global distributor of TiO2. Tronox operates a Rutile TiO2 plant in Stallingborough. The Stallingborough plant has a nameplate production capacity of 165,000 MT/year. It uses the chloride method.

[24] *The PCN structure used by the Commission is set out in Table B to the exporting producer questionnaires, which are available at: https://tron.trade.ec.europa.eu/investigations/case-history?caseId=2694.*

[25] *As the Application excludes Anatase TiO2, the Applicant has removed the PCNs for (a) crystal morphology, which differentiates between Rutile TiO2 and Anatase TiO2; and (b) particle size, as particle size is not a relevant differentiator for Rutile TiO2 given the relative uniformity of particle size in Rutile TiO2.*

Tronox is part of the Tronox Group, which is the world's leading vertically integrated manufacturer of TiO2. The Tronox Group operates titanium-bearing mineral sand mines and beneficiation and smelting operations in Australia and South Africa to produce feedstock materials that can be processed into TiO2 for pigment, high purity titanium chemicals, including titanium tetrachloride, and ultrafine TiO2 used in certain specialty applications. The Tronox Group's strategy is to be vertically integrated and produce enough feedstock materials to be as self-sufficient as possible in the production of TiO2 at its eight pigment facilities located in the UK, Australia, Brazil, China, France, Saudi Arabia, and the United States.[26] The Tronox Group believes that vertical integration is the best way to achieve its ultimate goal of delivering low cost, high-quality pigment to its approximately 1,200 TiO2 customers throughout the world. The mining, beneficiation and smelting of titanium bearing mineral sands also creates meaningful quantities of co-products including zircon, pig iron, and the rare-earth bearing mineral, monazite, which the Tronox Group also supplies to customers around the world.

Address

Laporte Road, Stallingborough, NE Lincolnshire DN402PR, UK.

Email

[Sensitive information removed – Personal data]

Telephone

[Sensitive information removed – Personal data]

Contact Name

[Sensitive information removed – Personal data]

Company Ownership (provide broad details of shareholding)

Tronox is a wholly owned indirect subsidiary of Tronox Holdings plc, a UK registered company, listed on the New York Stock Exchange. At listed level, the majority of shareholders are institutional investors.

The organization chart from Tronox Holdings plc, the listed entity, to Tronox is as follows [CONFIDENTIAL – Information about the legal structure of the Tronox Group, showing that Tronox is ultimately wholly owned by Tronox Holdings plc].

[26] *Tronox Group's TiO2 plant in the Netherlands has been idled.*

Name of Lawyer/Representative

[Sensitive information removed – Personal data]

B.2. Period of Investigation

For the subsequent sections, please use the same 12-month period for every question and indicate below which 12-month period you are using. This period should not end more than six months before the date this application is submitted. This period will be referred to as 'the period of investigation (POI)' for the rest of the application. The 36-month period preceding the POI, will be referred to as the injury period. Please indicate the 12-month POI in the box below.

*The period of investigation ("**POI**") for the Application is 1 October 2024 to 30 September 2025.* *For the 36-month period preceding the POI, the Applicant uses 1 January 2022 to 31 December 2024.[27] The total period for assessing injury is thus 1 January 2022 to 30 September 2025 ("**Injury Period**").*

Please give the volume and value of like goods you produced in the UK for the POI.

In the POI, the Applicant produced [75,000-125,000] MT of Rutile TiO2. Using its average UK sales price in the POI as a basis, the corresponding value of this volume of Rutile TiO2 is GBP [200,000,000-300,000,000].

C. About Other Interested Parties

C.1. UK Producers

Your application must be supported by other UK producers who represent at least 25% of total UK production. This is based on production physically located in the UK. The level of support for the application must be greater than the level of opposition among UK producers.

If there are other UK producers, you will need to contact them and ask them whether they support or oppose this application. Please attach their written responses to your

[27] *Providing data from Q4 to Q3 for periods before the POI introduces a significant burden on the Applicant because the Applicant's financial reporting period follows calendar years. See, e.g., JCB Heavy Products Limited, AD0047, Application, Section B.2, in which the applicant used the same approach as the Applicant.*

application OR their details should be provided below. Use a separate table for each producer.

We understand that other producers may be concerned about providing confidential information for this form. If necessary, you can ask an independent third party to confidentially combine information from the individual companies. Alternatively, the other producers can send the information separately to the TRA for us to combine.

UK producer	
Legal name of company:	*Venator Materials UK Limited, Venator Materials plc, Venator Materials International UK Limited, and Venator Investments UK Limited ("**Venator**")*
Name (point of contact):	*Mark Firmin, Jonny Marston, and Helen Skeates of Alvarez & Marsal*
Role:	*Joint administrators of Venator*
Address:	*Titanium House, Hanzard Drive, Wynyard Park, Stockton-on-Tees, TS22 5FD, UK*
Telephone No:	*N/A*
Email:	*INS_VEMUKL@alvarezandmarsal.com*
Company website:	*www.venator.com*
Goods produced: Please list all the UK-made goods this producer makes which are sold on the UK market and are like the imports this application is about	*In the POI, Venator produced Rutile TiO2.*
Position regarding application	*Venator was the only UK producer of Rutile TiO2 other than the Applicant. However, in September-October 2025, Venator entered administration.[28]* *Venator explained that it had to enter administration because it was "severely impacted by increased competition and rising costs in recent months."[29] As a result, Venator idled its UK TiO2 plant in Greatham, likely in October 2025.[30] To ensure safe idling, the Applicant*

[28] *Venator, Alvarez & Marsal appointed administrators to Venator plc holding companies; UK, US and France trading companies continue to operate as normal, September 2025, **Annex C.1.1**; Venator, Alvarez & Marsal appointed to Venator Materials UK Limited, **Annex C.1.2**.*

[29] *Venator, Alvarez & Marsal appointed administrators to Venator plc holding companies; UK, US and France trading companies continue to operate as normal, September 2025, **Annex C.1.1**.*

[30] *Venator, Alvarez & Marsal appointed to Venator Materials UK Limited, October 2025, **Annex C.1.2**; Venator, Venator Materials UK Ltd agrees sale of Greatham site and associated TiO2*

	assumes that Venator ramped down its production at the Greatham plant over a period of, at least, several weeks. *Cynically, given that Venator entered administration because dumped Chinese TiO2 did not permit Venator to sell at a profitable price, Venator announced that it was planning to sell its Greatham plant to LB Group, the largest Chinese TiO2 producer, on 16 October 2025.[31] The proposed transaction is currently subject to regulatory approvals, including from the UK Competition and Markets Authority.* *[Sensitive information removed – Applicant and Venator's market operations]. Indeed, because of the proposed transaction, the Applicant assumes that Venator opposes the Application.* *Immediately after announcing the proposed transaction, Venator announced that 273 employees were made redundant,[32] leaving only 232 UK employees.[33] Out of the 273 redundancies, 126 were at the Greatham plant.[34] This indicates that neither Venator nor LB Group intends to continue significant production at the Greatham plant.* *As the Greatham plant is currently idled, in practice, the Applicant is the sole UK TiO2 producer. As such, the TRA should not consider Venator to be a UK TiO2 producer for the purpose of the investigation, except for historical data relevant to the injury and causation analyses.* *In any event, if the sale of Venator's UK TiO2 plant to LB Group would be concluded, then the Greatham plant should be disregarded for the purpose of the definition of the UK TiO2 industry as per Regulation 29 of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 ("**D&S Regulations**").* *That is because LB Group's UK TiO2 plant would be related to LB Group, the largest Chinese TiO2 producer, and would be or become an importer of LB Group Rutile TiO2 in the UK. Including the Greatham plant after it is*

*assets to LB Group, October 2025, **Annex C.1.3**.*

31 *Venator, Venator Materials UK Ltd agrees sale of Greatham site and associated TiO2 assets to LB Group, October 2025, **Annex C.1.3**.*

32 *Venator, Alvarez & Marsal appointed to Venator Materials UK Limited, October 2025, **Annex C.1.2**.*

33 *Hartlepool Mail, LB Group is still 'fully committed' to takeover of Hartlepool's Venator Materials UK plant after redundancies confirmation, October 2025, **Annex C.1.4**.*

34 *Hartlepool Mail, LB Group is still 'fully committed' to takeover of Hartlepool's Venator Materials UK plant after redundancies confirmation, October 2025, **Annex C.1.4**.*

	acquired by LB Group in the definition of the UK Rutile TiO2 industry for the purpose of an anti-dumping investigation on Chinese TiO2 would be nonsensical.

C.2. Other Parties

1. Provide details of all known producers/exporters in the exporting country or producer/exporter associations in the exporting country, including:

Name:	*LB Group*
Address:	*Zhongzhan District, Jiaozuo City, Henan Province, China*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*

Name:	*Anhui Gold Star Group*
Address:	*Building 9, No. 1, Xinhua Road, Cihu Economic Development Zone Maanshan, Anhui, 243051 China*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*

Name:	*Tikon Titanium Products Co. Ltd.*
Address:	*No. 4, Antang Road, Fubei Town, Linchuan District,Fuzhou City, Jiangxi, China*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*

Name:	*CNNC Hua Yuan Titanium Dioxide CO., Ltd.*
Address:	*Rm. 1001, Sandhill Plaza, No.2290 Zuchongzhi Road, Pudong, Shanghai, China*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*

Name:	*Jiangsu GPRO Group*
Address:	*99 Matai Street, Nanjing, China*
Email:	*N/A*

Telephone Number:	*[Sensitive information removed – Personal data]*

Name:	*Shandong Jinhai (Lubei)*
Address:	*Lubei High-tech Development Zone, Wudi County, Binzhou City, Shandong Province, China*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*

Name:	*Shandong Doguide Group Co. Ltd.*
Address:	*55 Qiugu Hengli River, Boshan District, Zibo City, Shandong Province, China*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*

Name:	*Pangang Group Titanium Dioxide Co. Ltd*
Address:	*Xiangyang Village, Dong District, Panzhihua City, Sichuan Province, China*
Email:	*N/A*
Telephone Number:	*[Sensitive information removed – Personal data]*

Name:	*China National Bluestar Group Co.*
Address:	*No.9 Beitucheng West Road, ChaoYang District, Beijing, China*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*

Name:	*Panzhihua Taihai*
Address:	*Panzhihua Vanadium and Titanium Industrial Park, Panzhihua City, Sichuan Province, China*
Email:	*N/A*
Telephone Number:	*[Sensitive information removed – Personal data]*

Name:	*Shandong Dawn Group*
Address:	*Longkou Development Zone, Longkou, Shandong, China*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*

Name:	*Ningbo Xinfu Titanium Dioxide Co., Ltd.*
Address:	*No.1 Yuejin Road Chemical Industry Ningbo Zhejiang, China*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*

Name:	*Panzhihua Haifengxin*
Address:	*No.70 Taiyuan Ave., V&Ti High-tech Industry Park, Renhe Dist., Panzhihua City Sichuan Province, China*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*

Name:	*Cangwu Shunfeng Titanium Dioxide Co., Ltd.*
Address:	*No.15 Longcheng East Road, Longxu Town, Longxu District, Wuzhou City, Guangxi Province, China*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*

Name:	*Chemours Chenguang*
Address:	*No. 1058, Canggong Road, Shanghai Chemical Industrial Zone, Fengxian District, Shanghai, China*
Email:	*N/A*

Telephone Number:	*[Sensitive information removed – Personal data]*

Name:	*Guangxi Jinmao*
Address:	*Teng County, Guangxi Chemical Industry Zone, China*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*

Name:	*GuangDong Hui Yun Titanium Industry*
Address:	*Fuxing Road, Liudu Town, Yun'an District, Yunfu City, Guangdong Province, China*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*

Name:	*Jiangsu Taibai Group Co. Ltd.*
Address:	*No. 68 Linjiang West Road, Zhenjiang, Jiangsu, China*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*

Name:	*Tianyuan Group*
Address:	*No. 61, West Section of Gangyuan Road, Lingang Economic and Technological Development Zone, Yibin City, Sichuan Province, China*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*

Name:	*Yunnan Dahutong*

Address:	*20F Block A, No. 1088, Hecheng Building, Haiyuanzhong Road, Gaoxin District, Kunming City, Yunnan Province, China*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*

Name:	*Panzhihua Xingzhong*
Address:	*Vanadium & Titanium Hight-tech Industrial Park, Panzhihua City, Sichuan Province, China*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*

2. Provide the details of all known importers of the goods in the UK or any associations of importers in the UK, including:

Name:	*Platter Group Limited*
Address:	*Alrewas House, Main Street, Alrewas, Burton On Trent, Staffordshire, DE13 7ED, UK*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*
Contact person (if available)	*[Sensitive information removed – Personal data]*
Nature of their business (retailer/agent etc)	*Distribution*

Name:	*Harristone Limited*
Address:	*Unit 10, Howard Road, Eaton Socon, St. Neots, Cambridgeshire, PE19 8ET, UK*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*
Contact person (if available)	*[Sensitive information removed – Personal data]*
Nature of their business (retailer/agent etc)	*Distribution*

Name:	*Brenntag UK and Ireland*
Address:	*Alpha House, Lawnswood Business Park Redvers Close, Leeds, LS16 6QY, UK*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*
Contact person (if available)	*[Sensitive information removed – Personal data]*
Nature of their business (retailer/agent etc)	*Distribution*

3. Provide the details of all known suppliers, users and consumers of the goods in the UK, or associations of suppliers, users or consumers including:

3.1. Suppliers and Supplier Associations

Name:	*Titanium Dioxide Industry Consortium UK Chapter*
Address:	*Reach Centrum, Cantersteen 47, 1000 Brussels, Belgium*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*
Contact Person (if available)	*[Sensitive information removed – Personal data]*

Name:	*Chemours UK Limited*
Address:	*2 New Bailey, 6 Stanley Street, Salford, Greater Manchester, M3 5GS, UK*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*
Contact Person (if available)	*[Sensitive information removed – Personal data]*

3.2. Users and Consumers

Name:	*British Coatings Federation Limited*
Address:	*Spectra House, Westwood Way Business Park, Coventry, CV48HS, UK*

Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*
Contact Person (if available)	*[Sensitive information removed – Personal data]*

Name:	*AkzoNobel*
Address:	*Unit 4A Mercer Way, Blackburn, BB1 2QZ, UK*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*
Contact Person (if available)	*[Sensitive information removed – Personal data]*

Name:	*Axalta*
Address:	*Stoke Business Centre Blackwell Road, Sutton-In-Ashfield, NG17 2RG, UK*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*
Contact Person (if available)	*[Sensitive information removed – Personal data]*

Name:	*Beckers*
Address:	*Goodlass Road, Speke, GB-L24 9HJ, Liverpool, UK*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*
Contact Person (if available)	*[Sensitive information removed – Personal data]*

Name:	*Covestro*
Address:	*Earl Road, Stanley Green Trading Estate, Cheadle Hulme, Cheshire, SK8 6PT, UK*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*
Contact Person (if available)	*[Sensitive information removed – Personal data]*

Name:	*Crown Paints*
Address:	*Crown House, Hollins Road, Darwen, Lancashire, BB3 0BG, UK*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*
Contact Person (if available)	*[Sensitive information removed – Personal data]*

Name:	*Hempel*
Address:	*Berwyn House, The Pavilions, Llantarnam Park, Cwmbran, South Wales, NP44 3FD, UK*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*
Contact Person (if available)	*[Sensitive information removed – Personal data]*

Name:	*Jotun*
Address:	*4th Floor, 46 Bow Ln, London, EC4M 9DL, UK*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*
Contact Person (if available)	*[Sensitive information removed – Personal data]*

Name:	*PPG*
Address:	*P8JM+8M Batley, UK*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*
Contact Person (if available)	*[Sensitive information removed – Personal data]*

Name:	*Sherwin Williams*
Address:	*A1 Business Parl, Knottingley, WF110BU, UK*
Email:	*[Sensitive information removed – Personal data]*

Telephone Number:	*[Sensitive information removed – Personal data]*
Contact Person (if available)	*[Sensitive information removed – Personal data]*

Name:	*British Plastics Federation Limited*
Address:	*BPF House, 6 Bath Place, Rivington Street EC2A 3JE, UK*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*
Contact Person (if available)	*[Sensitive information removed – Personal data]*

Name:	*Paper Industry Technical Association*
Address:	*Tower House, 269 Walmersley Road Bury, BL9 6NX, UK*
Email:	*[Sensitive information removed – Personal data]*
Telephone Number:	*[Sensitive information removed – Personal data]*
Contact Person (if available)	*[Sensitive information removed – Personal data]*

D. Representativeness

D.1. Summary of UK Producer support or opposition for this application

We need to know about the total volume of UK production for UK markets by the producers who support your application. **Please complete Annex 1**, which will guide you through the calculation of whether representativeness requirement is met in terms of volume and value. If any figures are estimates, please explain how you worked out this information.

*See **Annex 1**.*

*As explained in **Section C.1**, the Applicant currently is the sole UK Rutile TiO2 producer, as Venator idled its UK TiO2 plant in Greatham.*

Should Venator conclude the proposed sale of its UK TiO2 plant to LB Group, then LB Group's UK TiO2 plant should be disregarded for the purpose of the definition of the UK TiO2 industry under Regulation 29 of the D&S Regulations.

In any event, the Applicant has standing because it produces more Rutile TiO2 in the UK than Venator. The Applicant's Stallingborough plant has an annual nameplate capacity of 165,000 MT, whereas Venator's Greatham plant has an annual nameplate capacity of 150,000 MT – i.e., 10% less.[35] As a result, the Applicant meets the representativeness requirement.

*In completing **Annex 1**, the Applicant has assumed that Venator operated at the same capacity utilization rate as the Applicant. The Applicant has also assumed that the value per MT of Venator's production was the same as for the Applicant. These estimates are likely conservative, because, as explained in **Section C.1**, Venator idled its Greatham plant.*

D.2. Market share

1. The applicant UK industry/industries should have at least a 1% share of the UK market for the goods, irrespective of where the goods were produced. Please demonstrate this by **completing Annex 2**. If you have other specific market share information, please also provide that.

*See **Annex 2**.*

The Applicant has a share of the UK Rutile TiO2 market that is far above 1%.

*To complete **Annex 2**, the Applicant used HMRC import statistics for tariff code 3206 11 00 only.[36] This approach is appropriate to approximate the UK Rutile TiO2 market because, as explained in **Section A.1.3**:*

- *Imports under tariff code 2823 00 00 account for only [3-10%]% of imports under both tariff codes 2823 00 00 and 3206 11 00.*
- *Almost all imports under tariff code 2823 00 00 are of Anatase TiO2.*
- *Almost all imports under tariff code 3206 11 00 are of Rutile TiO2.*

2. Please note that the requirement can be waived in certain circumstances, for example if your application is about imports preventing a UK industry from

35 *Project Blue, China's LB Group tightens hold on global TiO2 capacity with UK acquisition, November 2025, **Annex D.1.2**.*

36 *See Import statistics (and Applicant prices) [Sensitive in its entirety – These statistics were obtained from a trade statistics service provider. Disclosure would violate third-party copyrights], **Annex A.1.3**, tab **1. Imports**.*

being established for a 1% market share. If you think the requirement should be waived, explain why.

N/A.

D.3. Related persons

If you know that the Applicant or any other known UK producer of the goods is related (as defined under Regulation 128 of the Customs (Import Duty) (EU Exit) Regulations 2018 (a)) to an exporter or an importer of the goods, describe the company and the relationship.

*See **Sections C.1** and **D.1** concerning the proposed transaction between Venator and LB Group.*

*Tronox is related to Tikon Titanium Products Co. Ltd. ("**Tikon**"), a Chinese exporting producer of Rutile TiO2. [CONFIDENTIAL – Business-confidential information about Tikon's ownership and its closure].*

E. Dumped Imports

Complete this section if you are making an application for a dumping investigation.

Please give us all the information you can about the imported goods you believe are being dumped and the injury being caused to UK industry.

E.1. Sufficiency Test

Please note that we may reject your application if there is not sufficient evidence of dumping or injury. Evidence of dumping is insufficient if the margin of dumping is less than 2% of the export price (minimal).

1. List all countries (or territories) where the imported goods are produced (country of origin) and the countries (or territories) from which they are exported to the UK, if this is different.

Rutile TiO2 is produced in and exported to the UK from several countries. The most important countries that exported Rutile TiO2 to the UK during the Injury Period are:

- *China*
- *Germany*
- *United States*
- *Mexico*
- *Belgium*

- *The Netherlands*
- *Czech Republic*
- *Norway*
- *Australia*
- *Saudi Arabia*
- *Spain*
- *United Kingdom*
- *Malaysia*
- *Hong Kong*
- *France*
- *Japan*
- *Slovenia*
- *Italy*
- *Poland*
- *South Korea*
- *Switzerland*
- *Unidentified*
- *South Africa*
- *Hungary*
- *Luxembourg*
- *Indonesia*
- *Denmark*

2. **Complete Annex 2**, giving the volume and value of the imported goods for the POI, to demonstrate percentage of total imports.

*See **Annex 2**.*

3. Provide details and evidence of how the volume and value of dumped imports have been calculated.

The reported data for the Applicant is actual data.

The reported volume data for Venator is based on the Applicant's market knowledge. As Venator operates in the same market conditions as the Applicant, the Applicant estimated the value of Venator's sales using the Applicant's average prices.

*The reported volume and value data for imports is HMRC import data based on country of origin.[37] The reported volume is thus the volume of imports of Chinese TiO2, and the reported value is the reported value of imports of Chinese TiO2 at the UK border ("**CIF UK**").*

E.2. Normal Value

Normal value refers to the domestic price that the imported goods are normally sold for on the domestic market in their country of export. This value should then be adjusted for costs arising after the ex-works (EXW) level (and any other factors that need to be considered) to make a fair comparison with the export price.

If your complaint concerns more than one exporting country, calculate the normal value for each country

There are several different methods for calculating normal value, with the appropriate method being determined by the circumstances of trade between the exporting country and the UK, and the nature of exporting country's economy.

Therefore, when you tell us the normal value of the goods, you will also need to explain which method you are using to calculate it and why.

The methods are:

- 'Comparable Price', this is the price of the goods in the ordinary course of trade in the home market of the exporting country;
- Constructed Normal Values in the country of export based on the cost of production, plus reasonable amounts that would have been incurred on a domestic sale in the country of export for administrative, selling and general expenses and for profit;
- 'Sales made to a third country by the exporter', provided this amount is representative of the domestic selling price in sales in the country of export (provide evidence to support this); or
- If none of the above is possible, establish the normal domestic value from the best information available to you and provide this information to us, along with an explanation of the approach you have adopted. Alternatively, if prices in the exporter's domestic market are unavailable and it is not possible to construct a normal value, please contact the TRA to discuss further options.

[37] *See Import statistics (and Applicant prices) [Sensitive in its entirety – These statistics were obtained from a trade statistics service provider. Disclosure would violate third-party copyrights], **Annex A.1.3**, tabs **1. Imports**, **Pivots Y**, **Pivots M**, and **Raw**.*

Where possible, you should calculate normal value using the 'Comparable Price' Method. However, there are situations where this would be inappropriate, and so one of the alternative methods should be used. This includes situations where:

- the goods are not sold in the ordinary course of trade in the domestic market of the exporting country;
- these sales on the domestic market of the exporting country sales don't allow a proper comparison with their sales on foreign markets because of:
    - a particular market situation;
    - low volume of sales in the domestic market of the exporting country;
- the overseas exporter does not sell these goods in their domestic market;
- the imports are from a particular foreign country – this is a specific term defined under Regulation 14 of the Dumping & Subsidy Regulations which means that it's difficult to use prices of goods in that country as a fair comparison.

More information on each of these conditions and when they apply can be found in our guidance on dumping investigations.

E.2.1. Method

Please indicate below the method you have used for calculating normal value of the imported goods. If you have used an alternative basis to comparable price (e.g. constructed normal value), please explain why you believe it isn't appropriate to use comparable price and provide your evidence to support this.

*In view of the length of the Applicant's response to this Section, the response is enclosed in **Annex E.2.1**.*

Please give the normal value calculations using the appropriate section below, making sure to use the section relevant to the method you have described in this section. Delete tables for any methodologies you are not using.

The evidence you provide of normal value should, as far as possible:

be representative of different product types or models within the goods you are applying to us to investigate, if there are substantial differences in the normal value between these product types and models; and relate to normal value spread over the POI

E.2.2. Comparable Price

Prices should be net ex-works (EXW) and exclude all internal taxes, such as VAT. If EXW prices are not available e.g. if Cost Insurance and Freight (CIF) or Free On Board (FOB) prices are the only ones available, these prices should be adjusted to bring them to a net ex-works level. If using this method, **please complete Annex 3**.

N/A. The Applicant constructs normal value because of the PMS in China.

E.2.3. Constructed Normal Value

Please complete Annex 4, explaining how each cost was calculated including:

- materials;
- direct labour;
- overheads;
- administration, sales and general expenses (ASG), excluding transport costs; and
- the reasonable profit margin in the country of origin.

Where there is a particular market situation, make adjustments to elements of cost or profit that are not substantially determined by market forces. For further information, see our guidance on adjusting costs when constructing normal value or contact our Pre-Application Office (contact@traderemedies.gov.uk)

For any of the above methodologies, attach supporting documentation for the prices, costs and any adjustments (see below) you have made. This can include:

- price lists;
- price quotations;
- sales invoices for domestic sales;
- sales correspondence;
- publicly available material containing information on domestic selling prices; and
- market surveys.

*See **Annex 4**.*

*As explained in **Section E.2.5**, the Applicant constructed normal value using data from Tronox Pigmentos do Brasil S.A. ("**Tronox Brazil**"). Tronox Brazil produces*

Rutile TiO2 using the sulphate method, which is the method used in the substantial majority of Chinese TiO2 production,[38] and in the majority of UK imports of Chinese TiO2.[39]

*The Applicant used actual average production costs for Tronox Brazil for the POI. For selling, general, and administrative expenses ("**SG&A**") and profit, the Applicant used Tronox Brazil's financial statements for the POI.[40]*

It is appropriate to use actual average production costs because there is no difference in the cost of production for different grades until the finishing process and finishing accounts for [Sensitive – Applicant's business operations].

E.2.4. Selling Price from Exporter to a Third Country

If this is the preferred method, **please use Annex 3**, indicating here which country you are using, and amending the listed adjustments to better reflect the adjustments made. Prices should be net ex-works (EXW) and exclude all internal taxes, such as VAT. If EXW prices are not available e.g. if Cost Insurance and Freight (CIF) or Free On Board (FOB) prices are the only ones available, these prices should be adjusted to bring them to a net ex-works level

N/A. The Applicant constructed the normal value.

E.2.5. Appropriate Third Country

This method is only available for particular foreign countries as defined under Regulation 14 of the D&S Regulations.

1. Nominate an appropriate third country so you can establish normal values based on their selling prices.

Regulation 14(1)(b) of the D&S Regulations applies to the PRC. Thus, the TRA should calculate the normal value of Chinese TiO2 based on the costs of production of like goods plus a reasonable amount for SG&A and for profits in an appropriate

---

38 *See **Annex A.3.4**.*

39 *Since January 2024, Chinese export statistics under tariff code 3206 11 distinguish between:*
- *3206 11 11: "Titanium White, containing 99.8% or more of rutile, brightness (lightness of powder)¡Ý99.0," which contains almost exclusively Rutile TiO2 produced using the chloride method. That is because only chloride Rutile TiO2 meets the 99.8% rutile and brightness thresholds set out in the description of this tariff code; and*
- *3206 11 19: "Other titanium white," which contains almost exclusively Rutile TiO2 produced using the sulphate method.*

*Chinese export statistics for the POI provide that 57% of Chinese exports of Rutile TiO2 to the UK are produced using the sulphate method. See General Administration of Customs of the People's Republic of China, **Annex E.2.3.1**.*

40 *Tronox Brazil data [Sensitive in its entirety – Applicant's business operations], **Annex E.2.3.2**.*

third country. As explained below, the Applicant considers that Brazil is an appropriate third country in the sense of Regulation 14(4) of the D&S Regulations.

Should the TRA consider that Regulation 14(1)(b) does not apply to the PRC, Brazil also meets the requirements for an appropriate representative country based on which adjustments can be made under Regulation 13(4)(a) of the D&S Regulations.

2. Explain your basis for selecting this third country.

Brazil meets the requirements for the selection of the appropriate representative third country under Regulations 14(4) and 13(5) of the D&S Regulations.

This is confirmed by the fact that the Commission used Brazil as the representative country in the EU anti-dumping investigation on Chinese TiO2,[41] as well as by the TRA's use of Brazil in prior anti-dumping investigations.[42]

A. Brazil has a similar level of economic development to the PRC

*As **Table 3** below demonstrates, Brazil has a similar level of economic development to the PRC, based on GDP per capita, World Bank classification, life expectancy, literacy rate, and employment in the industry as a percentage of total employment.*

Table 3 – Level of economic development		
Development indicator	***China***	***Brazil***
GDP per capita (2024)[43]	*USD 13,303*	*USD 10,280*
World Bank classification[44]	*Upper middle income*	*Upper middle income*
Life expectancy (2023)[45]	*78 years*	*76 years*
Literacy rate[46]	*96.7% (2020)*	*94.8% (2024)*
Employment industry as % of total employment (2023)[47]	*32%*	*20%*

B. Evidence of a Brazilian Rutile TiO2 industry

Brazil has a sizeable domestic Rutile TiO2 industry. Tronox Brazil's Salvador plant has a nameplate production capacity of 60,000 MT. The Rutile TiO2 manufactured in

41 *See, e.g., recital 195 to Commission Implementing Regulation (EU) 2025/4 of 17 December 2024 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, OJ L, 2025/4, 9.1.2025.*

42 *See, e.g., TRA, AD0047, Final determination: Dumping investigation into certain excavators imported into the United Kingdom originating from the People's Republic of China, paras. 333-335.*

43 *World Bank, GDP, **Annex E.2.5.1**.*

44 *World Bank, Country classification, **Annex E.2.5.2**.*

45 *World Bank, Life expectancy, **Annex E.2.5.3**.*

46 *World Bank, Literacy rate, **Annex E.2.5.4**.*

47 *World Bank, Employment in industry, **Annex E.2.5.5**.*

Brazil is identical to Chinese Rutile TiO2 in terms of applications physical, and technical characteristics.

The Brazilian market for TiO2 is, aside from dumped imports of Chinese TiO2, competitive and mature, as illustrated by the substantial imports of TiO2 from third countries.[48]

C. Availability of data

Tronox Brazil has provided the Applicant with all necessary data.

3. **Please use Annex 3** to calculate the Normal value based on the third country data, amending the listed adjustments to better reflect the adjustments made. Prices should be net ex-works (EXW) and exclude all internal taxes, such as VAT. If EXW prices are not available e.g. if Cost Insurance and Freight (CIF) or Free On Board (FOB) prices are the only ones available, these prices should be adjusted to bring them to a net ex-works level.

N/A. The Applicant constructed normal value.

E.3. Export Price of the Goods

The export price is the selling price of the goods from the exporting country to a UK importer or a third party for export to the UK. This is adjusted to account for export costs and calculated back to the ex-works export price in the country of export. In most cases, you can base the export price on the price charged by the exporter to an unrelated importer in the UK. If your complaint concerns more than one exporting country, calculate the export price for each country

However, you may need to construct export price based on sales to first independent buyers or another reasonable method if:

- there is no export price;
- the price is unreliable due to an association or compensatory arrangement between the exporter and UK importer or third party.

Before providing the export price of the goods, please explain which basis you are using to calculate this and why. If you have constructed the export price, please give your reasoning for doing this and evidence to support this.

*See **Annex 5**.*

[48] *COMEX Stat, Brazilian imports of TiO2, **Annex E.2.5.6**.*

The Applicant uses HMRC import data based on origin to establish the export price. This price is at the level of CIF UK. The Applicant used imports under tariff code 3206 11 00 only.[49] *This approach is appropriate because, as explained in* ***Section A.1.3****:*

- *Imports under tariff code 2823 00 00 account for only [3-10%]% of imports under both tariff codes 2823 00 00 and 3206 11 00.*
- *Almost all imports under tariff code 2823 00 00 are of Anatase TiO2.*
- *Almost all imports under tariff code 3206 11 00 are of Rutile TiO2.*

The export price reflects the average price of all UK imports of Chinese Rutile TiO2. The majority of UK imports of Chinese Rutile TiO2 – around [55-65%]% in the POI – is produced using the sulphate method. It is appropriate to use the average export price because there typically is no price difference on the UK market between Chinese Rutile TiO2 produced using the sulphate and chloride methods.

The Applicant's approach to calculating the export price is conservative as several Chinese TiO2 producers use related importers in the UK to import and sell TiO2. The TRA should make deductions for the ASG costs and profit incurred by these related importers when establishing the export price under Regulations 15(5)(a)-(b) and 15(6)(f)-(g) of the D&S Regulations.

*To arrive at the export price at the level of the Chinese factory ("****EXW PRC****"), the Applicant deducted estimated costs of ocean freight, ocean insurance, handling and loading at the port in the PRC, and domestic transport in the PRC.*

Please give your export price calculations in the appropriate table below. Make sure you use the basis you described above and delete tables for any methodologies you are not using. Please note that whichever methodology you use, you will need to provide an export price on a CIF and EXW level. You should use price information from the POI.

The evidence you provide of the export price should, as far as possible:

- be representative of different product types or models within the goods you are applying to us to investigate, if there are substantial differences in the normal value between these product types and models; and
- relate to normal value spread over the POI

If either/both of these are not possible, please explain why. If you consider that export prices would not have varied significantly over the last year and so prices over

[49] *See Import statistics (and Applicant prices) [Sensitive in its entirety – These statistics were obtained from a trade statistics service provider. Disclosure would violate third-party copyrights],* ***Annex A.1.3****, tab* ***1. Imports****.*

the period outlined above would not be relevant for establishing representative export prices, please explain why you consider that to be the case.

E.3.1. Export Price Based on the Selling Price of the Goods From China to a UK Importer or a Third Party for Export to the UK

Provide the export prices of the allegedly dumped goods using Annex 5 Evidence and individually itemise the costs subtracted from this selling price to bring it back to an ex-works level, such as publicly available freight rates. Explain how the amounts were established.

Provide documentary evidence for the selling price to the importer in the UK, such as:

- sales invoices;
- written offers;
- price quotations;
- sales correspondence; or
- official statistics.

*See the response to **Section E.3**.*

E.3.2. Constructed Export Price

Calculate the constructed export price(s).

You may need to adjust for any costs included in the selling price which relate to the movement of the goods to the UK. If you are using sales to the first independent buyer as a basis for constructing, establish the details of the first sale to an independent buyer in the UK and deduct taxes, costs, charges, expenses and profit margins to obtain an ex-works price in the country of origin.

If there are different models or types of product for the imported goods, please construct a price for each one. Provide each adjustment separately. If your starting point is a CIF value, you will only have to find and deduct costs incurred by the exporter in the country of export from CIF back to the ex-works level.

Provide evidence to show how you have calculated or estimated the export prices. Include all the evidence you have on the resale price of the imported goods in the UK. Provide the basis for the costs and profits subtracted from this selling price to

bring it back to an ex-works level such as published industry mark-ups or publicly available freight rates and give evidence to support each cost adjustment.

N/A. The Applicant did not construct the export price.

E.4. Fair Comparison

To achieve an appropriate price comparison, the export price and the normal value should be compared at a fair level, in terms of their basic physical and chemical characteristics and the terms and conditions of sale. To achieve this comparison, please adjust your calculations to account for any differences which affect price comparability. This means that the comparison should be made at the same level of trade (such as wholesale or retail), at ex-factory level (EXW), and where possible, at the same time.

For certain types of adjustment, only the normal value may need to be adjusted. Sometimes both the normal value and export price will need to be adjusted. Use the table of adjustments below to check if the adjustment can be applied to export price or normal value or both. For more information, please consult our fair comparison guidance.

Table of adjustments	Export Price	Normal Value
Physical characteristics	No	Yes
Import charges and indirect taxes	No	Yes
Discounts, rebates, quantities	Yes	Yes
Level of trade	No	Yes
Transport, insurance, handling	Yes	Yes
Packing	Yes	Yes
Credit	Yes	Yes
After sales costs	Yes	Yes
Commissions	Yes	Yes
Currency Conversion	Yes	Yes

1. Provide the relevant adjustments so you can compare the export price and normal value.

*The Applicant made the relevant adjustments to the constructed export price in **Section E.3** above.*

2. Provide, for all adjustments you make, the following:

- details of the differences that resulted in an adjustment;

- details of how you produced the estimate of the allowances for the differences; and
- supporting evidence concerning these differences.

N/A.

E.5. Dumping Margin

If the overall dumping margin calculated across all product types/models and across all transactions is **less than 2%**, the Regulations consider this to be minimal and we cannot initiate an investigation.

Calculate the dumping margin. **Complete Annex 7**, repeating the calculation for each different model of the imported goods you have previously identified. Make sure you do this for each export price you have provided and for the normal value you have provided which is most closely comparable to that export price. If your complaint concerns more than one exporting country, calculate the dumping margin for each country.

If the normal value or the export price (or both) you have used was not an ex-works price, please describe the level of trade it relates to.

*See **Annex 7**.* *The Applicant computed a dumping margin of **58.4**%.*

F. Injury

This section is about injury which the imports may be causing to the UK industry for the goods.

Injury as defined by the Act can refer to:

- Material injury, or the threat of material injury to the industry, or
- Material retardation of the establishment of the industry.

If your industry has suffered or is suffering material injury, all companies/associations involved in this application must complete the section G1 separately. This section should also be completed to represent the entire UK industry. Label each completed section clearly showing who it relates to.

If your industry is threatened with material injury but there is no injury yet, all companies/associations involved in this application must complete the section G1

separately. This section should also be completed to represent the entire UK industry. Label each completed section clearly showing who it relates to.

If your industry is nascent and is being or has been materially retarded, please contact us at contact@traderemedies.gov.uk.

F.1. Material Injury

Material injury is determined through a number of injury indicators. Not all the injury factors need to indicate material injury, but all the factors need to be considered in order to establish material injury. These include, but are not limited to:

- Actual and potential decline in: sales, profit, output, market share, productivity, return on investments, or use of capacity;
- Factors affecting domestic prices of the goods;
- The magnitude of the margin of dumping and/or the amount of subsidy; and
- Actual and potential negative effects on: cash flow, inventories, employment, wages, growth, ability to raise capital, or investments.

1. Please describe, with appropriate figures, how the UK industry for these goods has performed in terms of each of the above injury indicators for the POI, and injury period.

- Explain how you have calculated the figures and substantiate your figures with evidence.
- Provide evidence for each indicator.
- If you don't know the exact figures for other UK producers, provide an estimate based on reasonable assumptions.
- State the methodology and assumptions that you used.

The UK Rutile TiO2 industry is suffering material injury. As per Regulation 27(2) of the D&S Regulations, to establish injury, the Applicant considers:

- *The volume of dumped Chinese Rutile TiO2 (Sub-section A).*
- *The prices of the dumped imports of Chinese Rutile TiO2 (Sub-section B).*
- *The economic state of the UK Rutile TiO2 industry (Sub-section C).*

The Applicant concludes with a summary of the injury suffered by the UK Rutile TiO2 industry (Sub-section D).

A. Volume effects

A.1. UK consumption

*As a starting point for the analysis of volume effects, the Applicant estimated UK consumption of Rutile TiO2 in **Annex 2**. To estimate UK consumption, the Applicant used (a) its own UK sales data; (b) its best estimate of Venator's UK sales; and (c) import statistics for sales of all non-UK Rutile TiO2.*

*UK consumption of Rutile TiO2 is driven primarily by consumption at [Sensitive information removed – Applicant's market knowledge]. As **Table 4** reports, UK consumption remained relatively stable over the Injury Period. Consumption fell by 4% from 2022 to 2023 but then increased again. In the POI, consumption was 4% higher than in 2022.*

Table 4 – UK consumption of Rutile TiO2[50]				
	2022	**2023**	**2024**	**POI**
Consumption (MT)	*[72,500-88,000]*	*[70,000-86,000]*	*[75,000-92,000]*	*[75,000-92,000]*
Index	*100*	*96*	*105*	*104*

A.2. Import volumes from the PRC

*As **Table 5** demonstrates, UK imports of Chinese Rutile TiO2 decreased sharply from 2022 to 2023. Imports increased again ever since, with import volumes increasing by 65% from 2023 to the POI. On a quarterly basis, as Figure 3 shows, UK imports of Chinese Rutile TiO2 increased consistently since Q3 2022.*

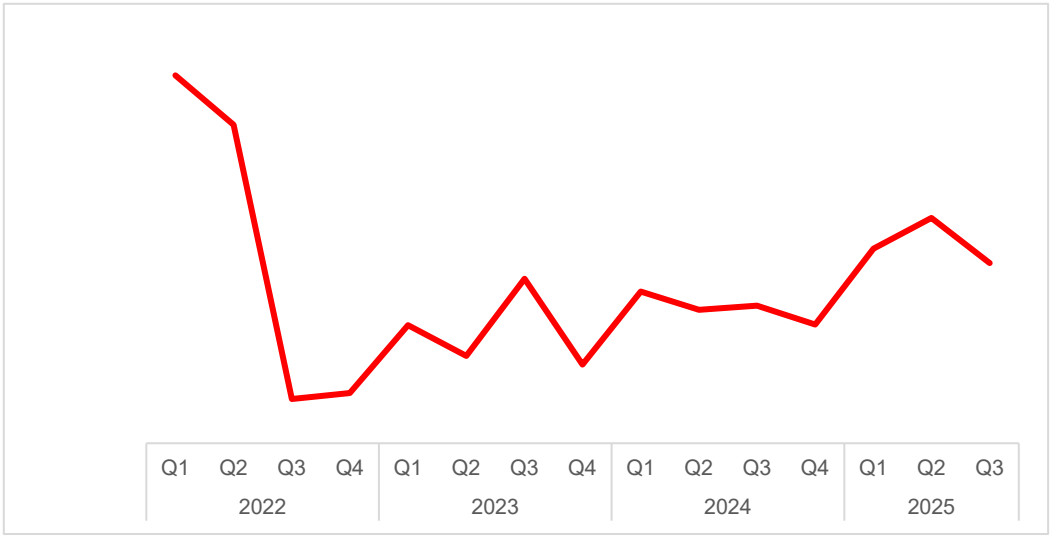
As consumption remained stable over the Injury Period, the market share of Chinese Rutile TiO2 follows a similar trend to that in import volumes.

Table 5 – UK imports of Chinese Rutile TiO2[51]				
	2022	**2023**	**2024**	**POI**
Import volume (MT)	*[16,000-19,000]*	*[9,000-11,000]*	*[11,000-13,000]*	*[15,000-18,000]*
Index (2022)	*100*	*58*	*69*	*95*
Index (2023)		*100*	*121*	*165*
Market share (%)	*[21-23]*	*[12-14]*	*[14-16]*	*[19-21]*
Index (2022)	*100*	*60*	*67*	*92*
Index (2023)		*100*	*111*	*152*

50 *See **Annex 2**.*

51 *Source: Import statistics (and Applicant prices) [Sensitive in its entirety – These statistics were obtained from a trade statistics service provider. Disclosure would violate third-party copyrights], **Annex A.1.3**. As explained in **Section A.1**, the Applicant used imports under tariff code 3206 11 00. Including imports under tariff code 2823 00 00, which account for ~10% of imports under tariff code 3206 11 00, does not affect trends.*

Figure 3 - Quarterly UK imports of Chinese Rutile TiO2 (kg)[52]



To appreciate how Chinese Rutile TiO2 is increasingly flooding the UK market, it does not suffice to look at the Injury Period. Instead, it is instructive to consider the evolution of imports over a longer period.

As Figure 2 (replicated below from above) demonstrates, UK imports of Chinese Rutile TiO2 increased sharply over the past 15 years in terms of absolute volumes and as a share in total imports.

Figure 2 also demonstrates that the peak in Chinese Rutile TiO2 imports for 2022, the start of the Injury Period, was an anomalous year. Specifically, Chinese Rutile TiO2 producers sold particularly high volumes of Rutile TiO2 on the UK market during the Covid-19 period H2 2020- H1 2022. In this period, driven by massive government stimulus spending there was unprecedented and urgent demand for paints and coatings and, consequently, for Rutile TiO2. Market observers called this "the stay-at-home economy." To meet demand, the three large UK paints and coatings producers rushed to secure these exceptional additional volumes of Rutile TiO2 and, unsurprisingly given the vast Chinese overcapacities,[53] *they turned to Chinese Rutile TiO2 producers.*

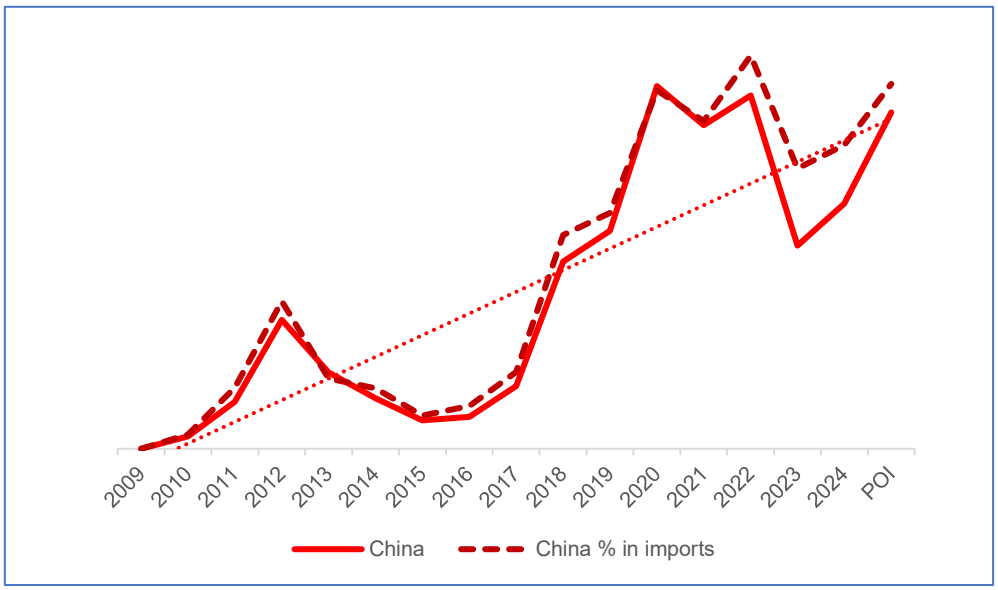
As demand returned to normal levels in H2 2022, the import volume of Chinese Rutile TiO2 dropped. However, the import volume of Chinese Rutile TiO2 quickly returned to the upward growth trajectory which began in 2009 concomitantly with the growth in Chinese exports of Rutile TiO2 shown in Figure 2.

---

52 *Source: Import statistics (and Applicant prices) [Sensitive in its entirety – These statistics were obtained from a trade statistics service provider. Disclosure would violate third-party copyrights],* ***Annex A.1.3****.*

53 *See* ***Section F.1.2****.*

Figure 2 - Yearly UK import volumes of Chine Rutile TiO2 (MT)[54]



B. Price effects

B.1. Import prices from the PRC

Chinese Rutile TiO2 producers' have grabbed outsized market share solely on injuriously low prices. Non-Chinese producers uniformly offer better customer service, quality, reliability and timely delivery.

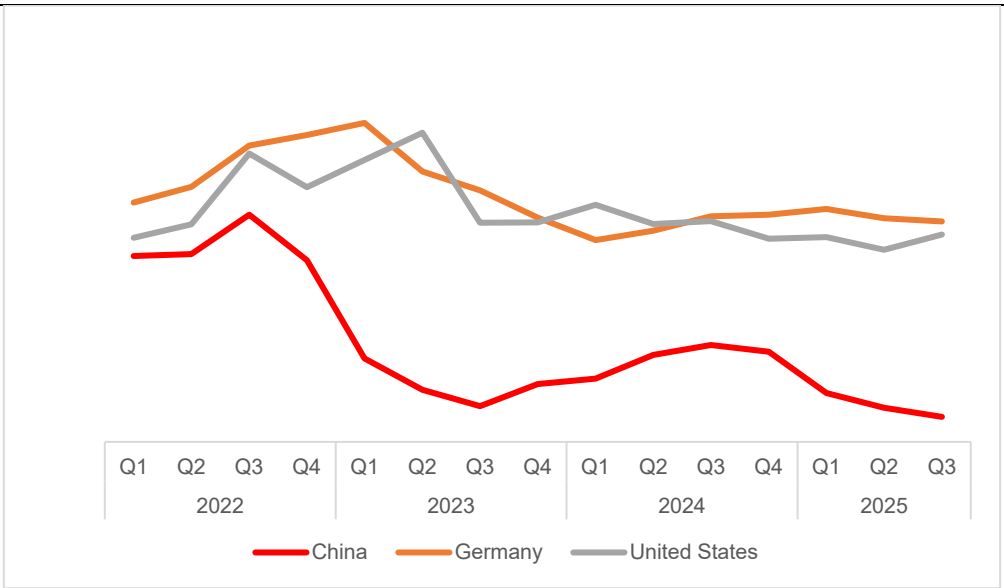
*As **Table 6** demonstrates, the price of imports of Chinese Rutile TiO2 decreased by almost 30% from 2022 to the POI.*

Table 6 – UK import price of Chinese Rutile TiO2[55]				
	2022	**2023**	**2024**	**POI**
Import price (GBP/MT)	*[2,200-2,500]*	*[1,700-1,900]*	*[1,800-2,000]*	*[1,600-1,800]*
Index	*100*	*73*	*79*	*71*

To put these prices into perspective, it is instructive to compare the price of imports from the PRC with the price of imports from Germany and the United States, which are the two largest exporters of Rutile TiO2 to the UK after the PRC.

As Figure 4 demonstrates, despite inflationary pressure, the price of Chinese Rutile TiO2 imports dropped sharply over the POI, whereas the price of German and U.S. imports remained stable. The price of Chinese imports currently is a whopping [~40]% lower than that of German and U.S. imports (despite prices of German and U.S. imports being suppressed by Chinese imports).

Figure 4 - UK import price of Rutile TiO2 (GBP/MT)[56]



The Applicant notes the small price increase in Chinese Rutile TiO2 prices in Q3 2022 coincides with the drop in Chinese Rutile TiO2 import volumes set out in Figure 3 above. Thus, in addition to demand returning to normal levels in Q3 2022 (as the effects of the Covid-19 pandemic subsided), the drop in Chinese Rutile TiO2 import volumes in Q3 2022 was also caused by an attempt by Chinese Rutile TiO2 producers to increase their prices after making large volumes of sales in preceding quarters. However, faced with higher prices of Chinese Rutile TiO2, UK consumers switched back to the higher-quality, more reliable non-Chinese suppliers. Chinese producers responded by sharply dropping prices. This demonstrates that the sole reason that consumers purchase Chinese Rutile TiO2 is because it is priced so low.

The Applicant provides more information on the impact of prices of Chinese Rutile TiO2 on its prices and business in its undercutting and underselling calculations in ***Sections F.1.4*** *to* ***F.1.6****.*

C. Injury indicators for the UK Rutile TiO2 industry

C.1. Macro-economic indicators for the UK Rutile TiO2 industry

For historical data, it is appropriate to consider Venator as part of the UK Rutile TiO2

54 *Source: Import statistics (and Applicant prices) [Sensitive in its entirety – These statistics were obtained from a trade statistics service provider. Disclosure would violate third-party copyrights],* ***Annex A.1.3****.*

55 *Source: Import statistics (and Applicant prices) [Sensitive in its entirety – These statistics were obtained from a trade statistics service provider. Disclosure would violate third-party copyrights],* ***Annex A.1.3****. As explained in* ***Section A.1****, the Applicant used imports under tariff code 3206 11 00. Including imports under tariff code 2823 00 00, which account for ~10% of imports under tariff code 3206 11 00, does not affect trends.*

56 *Source: Import statistics (and Applicant prices) [Sensitive in its entirety – These statistics were obtained from a trade statistics service provider. Disclosure would violate third-party copyrights],* ***Annex A.1.3****.*

industry as Venator was, until recently, a UK producer of Rutile TiO2.

*As **Table 7** reports, the UK Rutile TiO2 industry's (i.e., the Applicant and Venator) sales increased from 2022 to 2024 before decreasing sharply from 2024 to the POI.*

As noted, 2022 was an exceptional year as H1 2022 was affected by sudden, additional demand caused by the Covid-19 pandemic. The UK TiO2 industry could not benefit from this additional demand, most of which was met by Chinese imports. In 2023, Chinese Rutile TiO2 producers lost significant market share as they attempted to increase prices in the UK market, which, as explained, resulted in customers returning to higher-quality, more reliable non-Chinese Rutile TiO2 producers where global contracts and established supply relationships exist. The result was that UK producers were able to reclaim some lost market share.

In response, Chinese Rutile TiO2 producers started decreasing prices, which have been in free fall ever since. Up until 2024, the UK Rutile TiO2 industry attempted to preserve its market share before injurious Chinese dumping overwhelmed these efforts during the POI.

Table 7 – UK Rutile TiO2 industry UK sales and market share[57]

	2022	**2023**	**2024**	**POI**
UK sales volume (MT)	[25,000-45,000]	[35,000-55,000]	[33,000-53,000]	[30,000-50,000]
Index	100	115	122	106
Market share (%)	[40-50]	[45-60]	[47-57]	[40-50]
Index	100	120	118	102

The financial and commercial health of the UK Rutile TiO2 industry will continue to deteriorate quickly post-POI. Venator idled its UK Rutile TiO2 facility in October 2025 thereby making 273 employees redundant,[58] which is more than half its UK workforce.[59] As 126 of the laid-off employees were employed at the Greatham plant,[60] it appears that neither Venator nor LB Group intends to continue significant Rutile TiO2 production at the Greatham plant.

C.2. Micro-economic indicators for the Applicant

C.2.1. Production capacity, production volume, and capacity utilization

*As **Table 8** reports, the Applicant's production volume decreased from 2022 to 2023. It then increased to 2024 before decreasing again in the POI. As production capacity remained stable, capacity utilization followed the same trend as production. Importantly, throughout the Injury Period, capacity utilization was much lower than healthy to absorb fixed costs. For reference, in 2021, capacity utilization (with the same capacity) was at [Sensitive information removed – Applicant's business data].*

Table 8 – Applicant UK capacity, production, and capacity utilization[61]				
	2022	2023	2024	POI
Production capacity (MT)	165,000	165,000	165,000	165,000
Index	100	100	100	100
Production volume (MT)	[Sensitive information removed – Applicant's business data]			
Index	100	88	109	107
Capacity utilization (%)	[Sensitive information removed – Applicant's business data]			
Index	100	88	110	107

C.2.2. UK sales, market share, export sales, and stocks

Table 9 reports the Applicant's UK sales, market share, export sales, and stocks.

Table 9 – Applicant UK sales, market share, export sales, and stocks[62]				
	2022	2023	2024	POI
UK sales volume (MT)	[5,000-15,000]	[15,000-25,000]	[15,000-25,000]	[15,000-25,000]
Index	100	170	205	186
Market share (%)	[10-15]	[20-25]	[22-27]	[20-25]
Index	100	177	197	179
Export sales volume (MT)[63]	[Sensitive information removed – Applicant's business data]			
Index	100	73	86	100
Stocks (MT)	[Sensitive information removed – Applicant's business data]			
Index	100	160	259	191

First, as to sales, the Applicant's UK sales are [Sensitive information removed – Applicant's business operations]. Despite that, the ever-lower prices of Chinese Rutile TiO2 imports mean that large customers increasingly move their demand to Chinese producers. Moreover, the large paint and coatings producers use the threat

57 Source: Applicant data and market intelligence. See **Annex 2**.
58 Venator, Alvarez & Marsal appointed to Venator Materials UK Limited, October 2025, **Annex C.1.2**.
59 Hartlepool Mail, LB Group is still 'fully committed' to takeover of Hartlepool's Venator Materials UK plant after redundancies confirmation, October 2025, **Annex C.1.4**.
60 Hartlepool Mail, LB Group is still 'fully committed' to takeover of Hartlepool's Venator Materials UK plant after redundancies confirmation, October 2025, **Annex C.1.4**.
61 Source: Applicant data.
62 Source: Applicant data.
63 The Applicant did not report the [Sensitive information removed – Applicant's business operations] volume of export sales to related companies outside the UK.

of injurious Chinese pricing as a cudgel to threaten the Applicant with further market share loss.

The Applicant's UK sales volume in 2022 was uncharacteristically low [Sensitive information removed – Applicant's business data] – because:

- *Chinese Rutile TiO2 producers grabbed a very significant share of purchases at [Sensitive information removed – Applicant's business operations], a key UK TiO2 customer in H1 2022.*
- *A force majeure incident [Sensitive information removed – Applicant's business operations].*
- *General demand contraction in H2 2022 after the boom in consumption of paints and coatings during the Covid-19 pandemic from H2 2020 to H1 2021.*

As demand normalized in H2 2022, the Applicant targeted the recovery of shares [Sensitive information removed – Applicant's business operations].

As of 2023 and up to 2024, the Applicant's UK sales increased. That increase followed a significant shift by [Sensitive information removed – Applicant's business operations], which was a one-off reason for the much higher total sales volume in 2023 and 2024 in the UK. It was important for the Applicant to get these additional volumes because the high fixed costs need to be absorbed by significant production volumes. However, as detailed below, the Applicant had no choice but to accept to sell these volumes at prices significantly below cost due to the price pressure from Chinese Rutile TiO2 imports. The Applicant also likely benefited from the 2023 struggles at Venator, which resulted in Venator Group applying for Chapter 11 protection from debtors in bankruptcy proceedings in the United States in May 2023. These proceedings concerned all Venator's UK entities.[64]

The Applicant's sales volumes dropped again from 2024 to the POI. As Figure 5 shows, the evolution in the Applicant's UK sales volumes since the start of 2024 paints a bleak picture. [Sensitive information removed – Applicant's business operations].

Figure 5 - Applicant quarterly UK sales in 2024-2025 (MT)

[Sensitive information removed – Applicant's data showing a decline in quarterly sales in 2024 and 2025]

The situation got worse post-POI. [Sensitive information removed – Applicant's business operations]. Prior years did not see any offset in UK pricing. However, this discount did not prove enough as LB Group decreased its prices by another 15% in

[64] *Venator, Venator reaches comprehensive agreement to enter prepackaged Chapter 11 to significantly reduce debt and promptly emerge positioned for long-term growth, 2023,* ***Annex F.1.1.1****.*

Q4 2025. The Applicant's sales volumes to [Sensitive information removed – Applicant's business operations and business data].

In sum, even with [Sensitive information removed – Applicant's business operations], the Applicant is losing volumes at key accounts in 2025 as Chinese Rutile TiO2 producers increasingly focus on the UK market. That focus reflects that the UK market has become more attractive than the EU and other large export markets due to the EU and other ADDs. With ADDs in place in ever more jurisdictions (and other tariffs in place in the United States), Chinese Rutile TiO2 producers' focus on the UK market will become ever greater unless the TRA also imposes ADDs.

Second, the Applicant's UK market share increased from 2022 to 2023 and from 2023 to 2024 for the same reasons as the Applicant's UK sales increased. From 2024 to the POI, the Applicant's market share decreased, illustrating the rapidly deteriorating situation.

Third, the Applicant's export sales decreased from 2022 to 2023 but then recovered and ultimately remained stable over the Injury Period.

Fourth, stocks increased significantly over the Injury Period, although they decreased somewhat from 2024 to the POI.

C.2.3. Prices

*As **Table 10** demonstrates, the Applicant's UK sales prices dropped every year since 2022, with prices dropping a total of [~10]% from 2022 to the POI. This decrease is even bigger when considering the ~14% inflation in the UK from 2022 to the POI.[65] Indeed, in real terms, prices dropped by a whopping ~25%. Even that figure is understated, as energy costs, which drive total costs, increased more than inflation.*

Table 10 – Applicant UK sales prices[66]

	2022	**2023**	**2024**	**POI**
UK sales price (GBP/MT)	*[2,000-3,000]*	*[2,000-3,000]*	*[2,000-3,000]*	*[2,000-3,000]*
Index	*100*	*94*	*91*	*89*

Again, the situation further deteriorated post-POI. [Sensitive information removed – Applicant's business operations] due to the increasing price pressure exerted by ever-cheaper Chinese Rutile TiO2 imports.[67]

C.2.4. Costs of production

65 *Bank of England, Inflation calculator, **Annex F.1.1.2**.*
66 *Source: Applicant data.*
67 *See above, **Sub-section B.1** to this Section.*

__Table 11__ reports the Applicant's cost of goods sold ("__COGS__"), administrative, selling and general costs ("__ASG__"), and employment over the Injury Period.[68] The reported costs are averages for all Rutile TiO2 produced in its UK facility, [Sensitive information removed – Applicant's business operations].

Table 11 – Applicant COGS, ASG, and employment[69]				
	2022	*2023*	*2024*	*POI*
COGS (GBP/MT)	*[Sensitive information removed – Applicant's business data]*			
Index	*100*	*101*	*89*	*89*
ASG (GBP/MT)	*[Sensitive information removed – Applicant's business data]*			
Index	*100*	*67*	*75*	*56*
Employment (FTE)[70]	*[Sensitive information removed – Applicant's business data]*			
Index	*100*	*97*	*100*	*102*

Despite inflationary pressures, the Applicant managed to reduce COGS by 11% over the Injury Period through cost discipline and by controlling certain operational issues (such as the issue that led to the force majeure incident in 2022). This is no small feat. Like all chemical operations, Rutile TiO2 production is extremely capital intensive. Due to Chinese dumping, the Applicant has not generated sufficient cashflow to cover its ordinary course capital requirements. Hence, the Applicant underinvests, which impacts plant reliability. That is a classic death spiral experienced by numerous UK heavy industries, all directly the result of Chinese injurious pricing.

ASG, which is small compared to COGS, decreased from 2022 to 2023 then increased from 2023 to 2024 before decreasing from 2024 to the POI. The lower ASG in the POI relates to yearly reconciliations that are not yet included in Q3 2025 data.

Employment remained stable – and even increased slightly – over the Injury Period, as the Applicant continues to be committed to providing high-quality UK jobs despite the financial difficulties caused to the Applicant by dumped Chinese Rutile TiO2.

C.2.5. Profit, investments, return on investment, finance costs, and cashflow

__Table 12__ reports the Applicant's net operating profit ("__NOPAT__") on its UK sales, investments, return on investment ("__ROI__"), finance costs, and cashflow.

Table 12 – Applicant profit, finance costs, investments, ROI, and cashflow[71]

68 *The Applicant has included finance costs and R&D costs into its ASG.*
69 *Source: Applicant data.*
70 *The Applicant is only reporting employment related to Rutile TiO2 production.*
71 *Source: Applicant data.*

	2022	2023	2024	POI
NOPAT on all sales (GBP)	[Sensitive information removed – Applicant's business data]			
Index	-100	-59	-19	-6
NOPAT on UK sales (GBP)	[Sensitive information removed – Applicant's business data]			
Index	-100	-158	-24	-19
NOPAT on UK sales (%)	[Sensitive information removed – Applicant's business data]			
Index	-100	-99	-13	-12
Finance costs (GBP)	[Sensitive information removed – Applicant's business data]			
Index	100	334	141	471
Investments (GBP)	[Sensitive information removed – Applicant's business data]			
Index	100	117	135	121
ROI (%)	[Sensitive information removed – Applicant's business data]			
Index	-100	-50	-14	-5
Cashflow (GBP)	[Sensitive information removed – Applicant's business data]			
Index	-100	-77	-55	-42

First, as concerns NOPAT, the Applicant was unable to turn a profit on its UK sales over the Injury Period, despite:

- *Increased capacity utilization, which helps absorbing fixed costs.*[72]
- *Increased UK sales volumes.*[73]
- *Cost discipline and control of operational issues, which reduced COGS.*[74]

The reason for the Applicant's losses is simple: the ever-increasing price pressure from dumped Chinese Rutile TiO2 imports makes it impossible to turn a profit on UK sales.

Second, finance costs increased from 2022 to 2023, decreased from 2023 to 2024 and then increased again from 2024 to the POI. Finance costs increased in the POI because of the deteriorating creditworthiness of the Applicant, which required the Applicant to [Sensitive information removed – Applicant's business operations]. This is exemplified by the Tronox Group's credit downgrade by S&P in December 2025, which was caused by oversupply and low prices. As explained throughout the

72 See above, **Section C.2.1**.
73 See above, **Section C.2.2**.
74 See above, **Section C.2.3**.

Application, oversupply and low prices are, in turn, caused by Chinese Rutile TiO2 producers.[75]

Third, despite making losses, the Applicant continued to maximally invest in its UK production facility. Investments increased by 21% over the Injury Period. The Applicant would have invested more if it would have been able to turn a profit. ROI remained negative throughout the Injury Period, as the Applicant was lossmaking.

Fourth, cashflow (total NOPAT minus investments) remained negative throughout the Injury Period, reflecting the Applicant's inability to generate positive cashflow.

In sum, and in line with what the TRA has seen in other investigations,[76] *the impact of dumped Chinese Rutile TiO2 is such that despite controlling costs and improving other metrics, the Applicant is not able to turn a profit.*

D. Conclusion on injury

In sum, UK imports of Chinese Rutile TiO2 increased exponentially over the last 15 years. After a Covid-19-related peak in H1 2022, Chinese Rutile TiO2 import volumes and market share have increased steadily.

The increase in UK imports of Chinese Rutile TiO2 is fuelled by a single factor: ever-lower prices. The pricing gap between dumped Chinese Rutile TiO2 and the already depressed and suppressed prices of the Applicant's product and non-Chinese imports has grown – and continues to grow – ever wider.

The impact of dumped Chinese Rutile TiO2 on the UK Rutile TiO2 industry is most visible in prices and profits. That is because like any high fixed-cost chemical business, the UK Rutile TiO2 industry needs to maintain sufficient production and sales volumes to maintain reasonable operating leverage: maintaining utilisation rates takes precedent over prices.

Despite significant cost inflation – particularly in energy prices – impacting nearly every aspect of production, the Applicant's prices have decreased consistently every year of the Injury Period – by 11%. In real terms, given inflation, the price decrease is at least a whopping 25%. That sharp price decrease resulted, despite the Applicant's cost control (which resulted in significantly lower COGS), in sustained losses throughout the Injury Period.

As price pressure from imports of Chinese Rutile TiO2 increased, Venator cracked and halted UK Rutile TiO2 production. The Applicant, as the sole remaining producer, is also facing ever-bigger pressure on volumes and prices, with the POI showing particularly worrisome volume and price trends.

---

75 *S&P, Tronox Holdings PLC rating lowered to 'CCC+' from 'B' on elevated leverage; Outlook negative, 18 December 2025,* ***Annex F.1.1.3****.*

76 *TRA, AD0047, Final determination, para. 585.*

It follows that the UK Rutile TiO2 industry suffers material injury.

2. Is your company suffering injury which you believe to have been caused by the imported goods? If so, please describe the injury. You may want to include the prices, volumes or profits associated with your production and sale of the goods you manufacture or describe other aspects of your business. Please specify and substantiate your claims with evidence. Please estimate the date when the injury began to affect your business. Explain how it has developed since this date.

*Yes, the Applicant is suffering material injury caused by dumped imports of Chinese Rutile TiO2. See **Sections F.1.1** and **G**.*

3. Report your total cost to make and sell like goods in the UK. Please clearly separate your costs of production (direct manufacturing costs and indirect costs), from your administrative, selling and general expenses (AS&G). Provide costs for each model that you produce. When giving your labour costs, please ensure you include all labour costs, directly or indirectly incurred by any activity related to the goods.

*See **Section F.1.1**, **Sub-section C.2**.*

4. For the goods that you produce, please state what level of profit, before tax and as a percentage of turnover, your company would expect to achieve if there was no injury from the imported goods and explain how you arrived at this figure.

*The Applicant considers that a reasonable target pre-tax profit would be **20.0**%.*

This target NOPAT is corroborated by:

- *The [~20]% average pre-tax operating profit margin calculated by [Sensitive information removed – A market intelligence provider] for the 10 best-performing Rutile TiO2 plants outside of China in 2024.*[77]
- *The [~20]% average pre-tax operating profit margin calculated by [Sensitive information removed – A market intelligence provider] for the 10 best-performing Rutile TiO2 plants outside of China in 2021.*[78]

[77] *[Sensitive information removed – A market intelligence provider], **Annex F.1.1.4**. The Applicant added column AI to compute the profitability as a percentage of revenue. [Sensitive information removed – Copyrighted material].*

[78] *[Sensitive information removed – A market intelligence provider], **Annex F.1.1.5**. The Applicant again added column AI to compute the profitability as a percentage of revenue.*

5. Explain if your current sales prices for the goods are the same as your target sales prices. If not, please explain the reasons for this.

The Applicant's current sales prices are far below target prices, because price pressure from Chinese Rutile TiO2 producers does not allow the Applicant to increase its prices to sustainable levels.

*See **Annex 8**, in which the Applicant computed an underselling (or injury) margin of **67.9**%.*

6. Provide details of any price undercutting and and/or if the prices of the dumped and/or subsidised imports are reducing or negatively affecting prices in the UK. Compare the sales prices of the dumped and/or subsidised imports with the sales prices of your goods on the UK market. Include any supporting evidence.

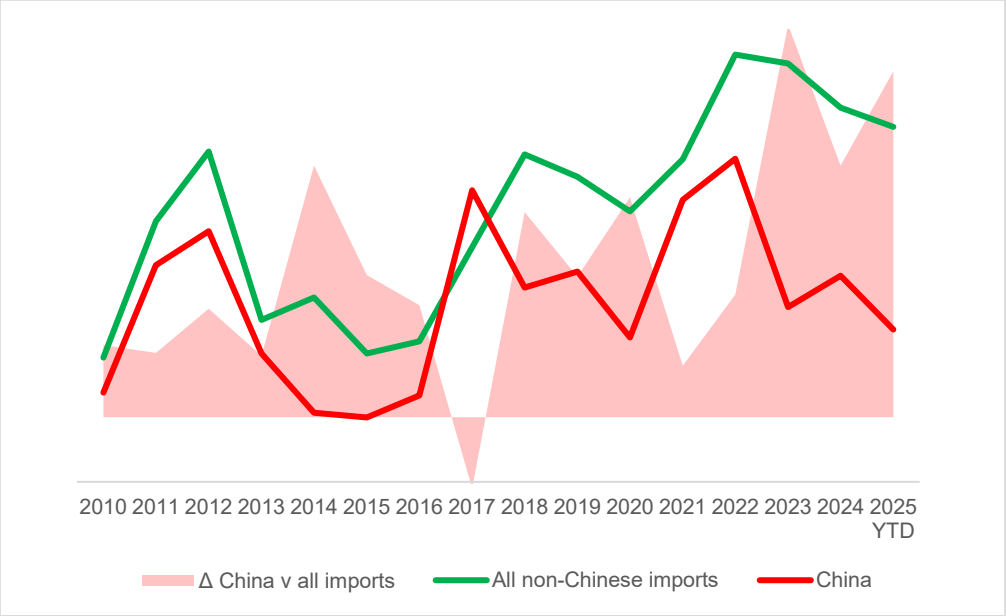
*See **Annex 8**, in which the Applicant computed an undercutting margin of **[20-30]**%.*

*As explained in **Section F.1.1**, **Sub-sections B.1** and **C.2.3**, Chinese Rutile TiO2 prices are pushing down the Applicant's UK prices to lossmaking levels. While, as Figure 6 shows, average UK import prices of Chinese Rutile TiO2 have consistently (except in 2017) been below UK import prices of all other Rutile TiO2 imports, this gap has increased significantly since 2023.*

Specifically, since 2023, the price gap between Chinese Rutile TiO2 and non-Chinese imports of Rutile TiO2 has been 40-60%, which is a whopping delta for a commodity product like Rutile TiO2.

The same applies to the gap between the Applicant's UK sales prices and the price of UK imports of Chinese Rutile TiO2, with the delta between these prices increasing sharply since Chinese Rutile TiO2 prices started their free fall from 2022 onwards.

Figure 6 - Import price delta (GBP/kg)[79]



Further, as Figure 6 shows [Sensitive information on Applicant prices removed from Figure], the sharp price decrease of UK imports of Chinese Rutile TiO2 from 2022 onwards depressed the Applicant's prices, which decreased every year of the Injury Period.[80]

Finally, the pricing behaviour of Chinese Rutile TiO2 producers also suppressed prices as the Applicant was prevented from raising its prices to sustainable levels due to the price pressure of Chinese imports.

F.2. Threat of Injury

1. Describe the change in circumstances that means the threat of material injury from dumping and/or subsidisation is foreseeable and imminent. The factors behind these changes could include:

   - the rate of increase of dumped and/or subsidised imports;
   - changes to the available production capacity of the exporters;
   - changes to inventories of the imported goods (i.e. if large stocks of these goods are building up in their country of origin ready for export);
   - expected price depression or price suppression of further imports; and

79 *Source: Import statistics (and Applicant prices) [Sensitive in its entirety – These statistics were obtained from a trade statistics service provider. Disclosure would violate third-party copyrights],* ***Annex A.1.3****, tab* ***1. Imports****.*

80 *See* ***Section F.1.1****,* ***sub-section C.2.3****.*

- any other relevant factors.

In addition to causing material injury to the UK Rutile TiO2 industry, dumped imports of Chinese Rutile TiO2 also threaten to cause further material injury to the UK Rutile TiO2 industry.

The rapid expansion of Chinese TiO2[81] production capacity without corresponding growth in domestic demand means Chinese Rutile TiO2 producers are reliant on exports to sustain production in support of the PRC's industrial ambitions. With anti-dumping measures in place in the EU, Brazil, India, and Saudi Arabia – of which India, the EU, and Brazil are China's three largest export markets -- Chinese Rutile TiO2 producers will inevitably redirect ever-larger volumes of Rutile TiO2 to the UK. This increasing influx of dumped Chinese Rutile TiO2 will further undermine fair competition, destabilise the UK market, and precipitate the collapse of the UK Rutile TiO2 industry. The UK Rutile TiO2 industry, already weakened economically by dumping practices, as evidenced by Venator's bankruptcy and the losses sustained by the Applicant, is facing an imminent, existential threat to its survival.

After a general introduction on the strategic importance of TiO2 production triggering overcapacities in the PRC (Section A), the Applicant addresses factors confirming the threat of material injury to the UK Rutile TiO2 Industry (Sections B-E).

A. Strategic importance of TiO2 for the PRC and resultant Chinese excess production capacity

TiO2, and thus Rutile TiO2, is of crucial strategic importance to the PRC. As LB Group, the largest Chinese TiO2 producer, put it in its 2023 annual report:

> *"Due to various uses of titanium dioxide in economic activities in China, consumption of the chemical product is considered as one of the important benchmarks of economic development and level of people's life in a country, so it is called a 'barometer of economic development'."*[82]

TiO2 is strategically crucial because it sits at the centre of several high-priority industrial value chains. The same chloride process used to produce Rutile TiO2 also yields TiCl4,[83] *an essential precursor for titanium metal, which is a critical input to the Chinese aerospace and defence industries. Rutile TiO2 production also generates valuable by-products such as ferrous sulphate (FeSO4), which is used to manufacture key materials for lithium-iron-phosphate (LFP) batteries and phosphate-based fertilisers.*

81 *In this section, the Applicant refers to TiO2 as available data typically covers both Rutile TiO2 and Anatase TiO2. [Sensitive information removed – Applicant's market knowledge].*
82 *LB Group, Annual report 2023,* ***Annex F.1.2.1****, p. 25 (emphasis added).*
83 *See above,* ***Section A.3.4****.*

These links, illustrated in Figure 7, make TiO2 vital not only for the PRC's ambitions in advanced manufacturing and aviation but also for its clean-energy and food-security strategies.

Figure 7 - TIO2 value chain[84]

[Sensitive information removed – Applicant's business operations – The figure outlines the TiO2 value chain, showing the progression from mineral sands to TiO2 production and then to key downstream applications. It also notes the strategic industries in China that rely on TiO2.]

Because TiO2 is crucial to the PRC's industrial ambitions, over the past two decades, the PRC has built an extreme level of excess TiO2 production capacity. Figure 8 shows that Chinese TiO2 production capacity is staggering in scale. Chinese nameplate production capacity approaches [Sensitive information removed – Applicant's market knowledge], which is nearly the entire world's demand.

Figure 8 - Global TiO2 production capacity in 2025 (000 MT)[85]

[Sensitive information removed – Market intelligence provider data. The chart shows that Chinese Rutile TiO2 production capacity dwarfs other countries' production capacity]

The amount of excess TiO2 production capacity that China has built since 2005 is not just extreme in absolute terms, but also extreme compared to production capacity in other major commodity chemical sectors. In 2005, Chinese TiO2 production capacity accounted for ~10% of global capacity. In 2024, this was ~55%. As Figure 9 illustrates, this is the highest share of all major commodity chemicals sectors.

Figure 9 - China chemical production capacity share in world capacity (%)[86]

[Sensitive information removed – Copyright-protected market intelligence provider data – The chart shows that China's share of world production capacity has increased across all listed chemical products, including TiO2, compared to 2005]

*Despite the extreme overcapacity, Chinese TiO2 production capacity continues to increase rapidly. As **Table 13** demonstrates, since 2017, Chinese production capacity increased by more than 60%. Further expansions planned for 2026 and 2027 will lead to an increase in capacity of 85% within a decade.*

Table 13 – Chinese TiO2 production capacity (MT)[87]		
Year	**Production capacity**	**Index**
2017		100

84 Source: Applicant.
85 Source: [Sensitive information removed – Market intelligence provider], **Annex F.1.1.4**.
86 Source: [Sensitive information removed – Market intelligence provider].
87 Source: [Sensitive information removed – Market intelligence provider].

2018	[Sensitive information removed – Copyrighted material]	104
2019		110
2020		116
2021		122
2022		131
2023		144
2024		156
2025		162
2026		173
2027		185

*There is no corresponding increase in Chinese demand for TiO2 that would justify increasing production capacity. To the contrary: the share of Chinese TiO2 consumption relative to Chinese TiO2 production capacity has decreased as Chinese production capacity increases significantly faster than domestic consumption. As **Table 14** shows, in 2020, production capacity was [75-100]% higher than Chinese demand. In 2024, this increased to [>100]%. By 2027, production capacity will be almost two and a half times higher than demand.*

Table 14 – Chinese TiO2 demand and production capacity (MT)[88]

Year	Demand	Production capacity	Ratio
2020	[Sensitive information removed – Copyrighted material]		
2021			
2022			
2023			
2024			
2025			
2026			
2027			

*For that reason, Chinese TiO2 producers turned to exports. As demonstrated in **Sections A.3.5** and **F.1.1**, **sub-section A.2**, Chinese TiO2 exports increased exponentially, both to the UK and globally. As Figure 10 shows, Chinese exports of TiO2 expressed as a percentage of global TiO2 production capacity has drastically increased over the last 20 years – much more than in other major commodity chemicals sectors.*

Figure 10 - Chinese exports as percentage of global production capacity (%)[89]

[Sensitive information removed – Copyright-protected market intelligence provider data – The chart compares changes in China's share of global production capacity

88 Source: [Sensitive information removed – Market intelligence provider].
89 Source: [Sensitive information removed – Market intelligence provider].

for various chemical products between 2005 and today. It shows that China's current share has increased in several segments, including in particular TiO2.]

The increase in Chinese production capacity and, as a result, in exports, has been significantly outpacing growth in global demand for TiO2 since 2022. As Figure 11 illustrates, the wide gap between growth in global demand and growth in Chinese TiO2 production capacity is particularly high in recent years. The sustained addition of additional production capacity not justified by demand underlines the PRC's objective of dominating the TiO2 value chain by exerting downward pressure on TiO2 prices and ultimately eliminating non-Chinese competition.

Figure 11 - Global demand growth and Chinese capacity growth[90]

[Sensitive information removed – Copyright-protected market intelligence provider data – The chart compares cumulative global demand growth with cumulative Chinese capacity growth from 2021 to Q12025. It shows that Chinese capacity has expanded much faster than global demand, particularly from 2021 onward.]

The ever-larger Chinese excess TiO2 production capacity and resultant dumped TiO2 exports are having significant real-world effects. The injuriously low prices created by the Chinese supply-demand imbalance and the distortions created by the PRC – which allow Chinese TiO2 producers to benefit from artificially low cost bases – have forced the closure of numerous non-Chinese plants, eliminating approximately [1-2 million] MT of global TiO2 production capacity. These closures reflect an ongoing structural shift that is dismantling non-Chinese TiO2 production capability and consolidating market power in the hands of Chinese TiO2 producers.

*As **Error! Reference source not found.** shows, the closure of non-Chinese production capacities has accelerated since 2022 [Sensitive information removed – Market information and Applicant's business data]. Chillingly, LB Group predicted these closures when it stated at an industry conference in November 2022 that the growth of the Chinese TiO2 production capacity will result in the "[r]emoval of capacity by Western suppliers."*[91]

Table 15 – Closed non-Chinese capacity (MT)[92]

Facility	Country	Year closure	Closed capacity (MT)
Greatham	United Kingdom	2025	150,000
Teluk Kalung	Malaysia	2025	60,000
Uerdingen	Germany	2025	76,000
Botlek	Netherlands	2025	90,000
Yokkaichi	Japan	2024	34,000
Varennes,	Canada	2024	17,000
Onahama	Japan	2024	60,000
Kuan Yin	Taiwan	2023	175,000

90 Source: [Sensitive information removed – Market intelligence provider].
91 LB Group, Delivering new TiO2 pigment capacity for the global market, TZMI Congress, 2022, **Annex F.1.2.2**, p. 20.
92 Source: Applicant.

Scarlino	*Italy*	*2023*	*80,000*
Duisburg	*Germany*	*2023*	*100,000*
Leverkusen	*Germany*	*2021*	*32,000*
Pori	*Finland*	*2018*	*130,000*
Umbogintwini	*South Africa*	*2016*	*25,000*
Calais	*France*	*2015*	*80,000*
Edge Moor, DE	*United States*	*2015*	*90,000*
New Johnsonville, TN	*United States*	*2015*	*60,000*
Jurong	*Singapore*	*2013*	*50,000*
Grimsby	*United Kingdom*	*2011*	*40,000*
Hawkins Point, MD	*United States*	*2011*	*50,000*
Savannah, GA	*United States*	*2009*	*100,000*
Savannah, GA	*United States*	*2007*	*60,000*
Le Havre	*France*	*2007*	*65,000*
Total closed capacity			***1,624,000***
Total closed capacity since 2023			***842,000***

B. Rate of increase of dumped imports of Chinese Rutile TiO2

*As set out in **Sections A.3.5** and **F.1.1**, **Sub-section A.2**, the rate of increase of dumped imports of Chinese Rutile TiO2 over the years, both globally and to the UK market, is extreme.*

As growth in Chinese TiO2 production capacity continues to outpace growth to domestic demand, Chinese Rutile TiO2 producers will increasingly target overseas markets. This threat is exacerbated by the closure of key export markets for dumped Chinese Rutile TiO2 via tariffs (the United States) and anti-dumping measures (e.g., Brazil, the EU, India, and Saudi Arabia). Chinese Rutile TiO2 producers will therefore turn to unprotected markets, such as the UK. In these circumstances, the UK will continue to see an increase of dumped imports of Chinese Rutile TiO2 until protective measures are put in place.

C. Changes to the available production capacity and inventories of Chinese Rutile TiO2 producers

*As set out in **Sub-section A**, the production of Rutile TiO2 is integral to China's ambitions in advanced manufacturing and aviation, as well as its strategies for clean energy and food security.*

Indeed, with regard to aviation, expanding production of Rutile TiO2 via the chloride route is closely linked to China's state-backed Commercial Aircraft Corporation of China (COMAC) as it strives to establish a domestically controlled rival to Airbus and Boeing through aircraft such as the C919 and CR929. That is because access to aerospace-grade titanium is indispensable because the metal's light weight, high strength, and heat resistance are essential for producing competitive, fuel-efficient airframes and critical engine components. And one of the most optimum routes for producing aero-space grade titanium is to use the TiCl4 co-product from Rutile TiO2 production. That is why so many of China's largest TiO2 producers are vertically integrated into titanium sponge production, too.

Due to the linkage to aerospace and other reasons, the PRC will continue investing heavily in new Rutile TiO2 production capacity, as it has done in previous years.[93] *In the words of the Commission:*

> *"… the Chinese capacity had massively increased. Now that Chinese producers have finally started to implement the chloride process, it is expected that expansion projects of the product concerned will add 1,96 million tonnes/year of new production capacity, of which more than 400 000 tonnes/year will be produced by the chloride method. Such a large new production capacity, difficult to absorb on the Chinese domestic market, will encourage the Chinese producers to export their materials."*[94]

As concerns inventories, a significant part of Chinese production capacity remains available to further increase inventories. The 2024 average capacity utilisation rate for Chinese TiO2 production facilities was [70-90] %, leaving [0.5-1.5] million MT in spare production capacity.[95] *From 2024 to 2027, the planned additional Chinese production capacity is another [0.5-1.5] million MT.*[96] *By the time the TRA concludes its investigation, there will thus be [1-2] million MT in spare Chinese production capacity. This is roughly [20-40] times UK consumption.*

Indeed, the extent to which the Chinese government is willing to subsidise its domestic producers is evident in Figure 12 below. This chart is produced by FerroAlloyNet.com, a Chinese domestic news source which reports on the PRC TiO2 industry. The chart shows how Chinese TiO2 producers have been in a loss-making position since May 2024. According to FerroAlloyNet.com, Chinese TiO2 producers are today losing [~500] USD/MT ([~350] GBP/MT) on a product that even at current super low Chinese import prices is imported into the UK at a price of [2,000 to 2,500] USD/MT ([~1,500 to 2,000] GBP/MT). Despite these large cash losses on each tonne produced, Chinese production capacity keeps increasing, as explained in ***Sub-section A*** *above.*

Figure 12 - China Rutile TiO2 cost-profit[97]

[Sensitive information removed – Third-party copyright-protected information – The chart illustrates that the cost of producing TiO2 in China through the sulphate method has remained above the market price, while profitability has declined sharply, turning negative in the third quarter of 2024]

D. Expected price depression or suppression of further imports of Chinese Rutile TiO2

---

93 *See, in particular,* ***Table 13*** *and* ***Table 14****.*

94 *See recital 90 to Commission Implementing Regulation (EU) 2024/1923 of 10 July 2024 imposing a provisional anti-dumping duty on imports of titanium dioxide originating in the People's Republic of China, OJ L, 2024/1923, 11.7.2024.*

95 *See [Sensitive information removed – Market intelligence provider],* ***Annex F.1.1.4****, columns J and K.*

96 *See* ***Table 14****.*

97 *Source: FerroAlloyNet.com.*

*As set out in **Section F.1.6** above, dumped Chinese Rutile TiO2 is entering the UK market at prices that significantly undercut, undersell, depress, and suppress the UK Rutile TiO2 industry's prices, which are already at loss-making levels. Prices have decreased particularly sharply in recent quarters, creating a structural threat that will mean the end of the UK Rutile TiO2 industry unless remedial action is taken. As demonstrated in **Section F.1**, the Applicant's situation is deteriorating rapidly, with Chinese Rutile TiO2 producers grabbing ever more volumes from major customers through aggressive pricing.*

The urgency of the threat to the UK Rutile TiO2 industry is further reinforced by the fact that other jurisdictions have already imposed anti-dumping duties on imports Chinese Rutile TiO2. These decisions demonstrate a global recognition of the injurious pricing practices of Chinese Rutile TiO2 producers. They also increase the likelihood that Chinese Rutile TiO2 exporters will divert ever-greater volumes at even lower prices to the UK market.

E. Other relevant factors

The threat of further material injury is further exacerbated by unfair and fraudulent trading practices of certain Chinese Rutile TiO2 producers.

Specifically, the Applicant has evidence of circumvention practices through transshipment via Malaysia, using fraudulent certificates of origin to evade applicable anti-dumping measures. Similarly, LB Group told customers that it has acquired land in Malaysia and intends to be finishing base pigment in Malaysia within a year. The strategy is to export Chinese TiO2 base pigment – which benefits from heavily distorted production and input costs in the PRC – to Malaysia, finishing it in Malaysia (as noted, finishing is the least costly and capital-intensive phase of the production process), and then claiming Malaysian origin to evade applicable anti-dumping measures on Chinese TiO2.

The same risk arises from LB Group's potential acquisition of Venator's Greatham site, which could be used for finishing operations and will allow LB Group to use the UK as a base to bypass anti-dumping measures in other jurisdictions. This is not idle speculation: [Sensitive information removed – Applicant's market intelligence and business operations].

2. If appropriate, include an analysis of trends (or a projection of trends) and market conditions illustrating that the threat is both foreseeable and imminent.

*See **Section F.2.1**.*

3. Explain why you believe the threatened injury to your industry will be material.

*See **Section F.2.1**. As Venator's bankruptcy shows, the threatened injury caused by dumped imports of Chinese Rutile TiO2 directly threatens the survival of the UK Rutile TiO2 industry.*

G. Causal Link between the Dumped Imports and Injury to Your Industry

For the TRA to initiate an investigation, there must be evidence of a causal relationship between the injury to the UK Industry and the alleged dumping and/or subsidisation.

1. If your company is suffering injury, please explain and provide evidence that shows how this has been caused by the goods you want us to investigate. Describe how the volumes and prices of the imported goods have affected your industry, basing your answer on the injury indicators in the previous section.

*As the Applicant demonstrated in **Section F**, dumped imports of Chinese Rutile TiO2 are the cause of injury to the UK Rutile TiO2 industry.*

*Venator, until recently the only UK Rutile TiO2 producer other than the Applicant, explicitly stated that it had to enter administration because it was "severely impacted by increased competition and rising costs in recent months."[98] This competition is not generic. It is, as **Annex 2** shows, competition from the PRC. Indeed, in the POI, import volumes from the PRC were more than double those of the second-largest source of imports, while prices of Chinese imports were [~40]% lower than those of other main sources of imports – a massive difference in a commodity market that should leave no room for such disparities.*

These facts demonstrate the deliberate and aggressive strategy of Chinese Rutile TiO2 producers to take over the UK market in support of the PRC's broader strategic objectives. After the temporary peak in UK import volumes of Chinese Rutile TiO2 in H1 2022 caused by a sudden Covid-19-related demand spike, Chinese Rutile TiO2 producers attempted to opportunistically increase their prices and maximise margins.

In response, customers switched back some volumes to reliable non-Chinese suppliers. Faced with loss of market share exacerbated by ever-increasing excess production capacity, Chinese TiO2 producers started decreasing their prices to grab back and expand market share. Since H2 2022, this has resulted in a sustained surge in UK imports of Chinese Rutile TiO2. Chinese Rutile TiO2 import volumes from the PRC rose by 65% from 2023 to the POI, while the market share of Chinese producers increased by half over the same period.

When anti-dumping investigations were announced in the Chinese TiO2 industry's three largest export markets – the EU, Brazil, and India (plus Saudi Arabia) – Chinese exporters "flooded the zone" to import as much Rutile TiO2 as possible before anti-

98 *Venator, Alvarez & Marsal appointed administrators to Venator plc holding companies; UK, US and France trading companies continue to operate as normal, September 2025, **Annex C.1.1**.*

dumping duties went into effect. Now that the gates have been closed to these key export markets, Chinese producers are shifting their attention to the UK and other markets that have yet to protect their domestic producers. Hence, as an important secondary market, the UK is now garnering outsized attention. This is particularly clear in the POI: Chinese producers quickly dropped prices even further, widening the price gap between Chinese and non-Chinese imports to levels never seen before,[99] and successfully captured volumes from the largest UK consumers.

The Applicant is left with an impossible choice:(a) further reduce its prices, which are already below cost, in order to fend off Chinese price competition; or (b) lose additional sales volumes to Chinese producers, which would make it impossible to turn a profit because low capacity utilisation rates mean the high fixed costs are spread over smaller production volumes. Either option results in sustained losses and threatens the Applicant's survival.

The strategic objective of the Chinese Rutile TiO2 producers for the UK market is clear: force the Applicant to close its plant, just like Venator did, and take over the UK market. The risk of plant closure is not chimerical. As evidenced in ***Error! Reference source not found.*** *in* ***Section F.2****, the Chinese TiO2 industry has forced the closure of [1-2] million tons of capacity since 2007, including of Tronox's flagship plant in Botlek Netherlands in March 2025.*

Crucially, at the non-injurious prices identified by investigating authorities in the EU, India, Brazil and Saudi Arabia, the Applicant could turn a reasonable profit, as pre-Injury Period data shows. It follows that the dumped Chinese Rutile TiO2 imports are not merely a contributing factor – they are the decisive cause of injury to the UK Rutile TiO2 industry.

2. Please indicate if the injury to your industry could be attributable in part or in full to any factors other than dumped or subsidised imports, for example:

- volume and prices of imports not sold at dumped prices;
- contraction in demand or changes in patterns of consumption;
- restrictive trade practices of, and competition between, third country and UK producers;
- developments in technology; and
- export performance and the productivity of the UK industry.
- This may be relevant as an industry weakened by other events may be more susceptible to injury from dumped or subsidised goods.

[99] *See Figure 6.*

Please provide evidence to support this information.

There are no factors other than dumped imports of Chinese Rutile TiO2 that break or even attenuate the causal link between the dumped imports and the material injury suffered by the UK Rutile TiO2 industry.

A. Imports from third countries

*As **Annex 2** demonstrates, UK imports of Chinese Rutile TiO2 are twice those of imports from Germany and the United States. In addition, prices of imports from Germany and the United States are [~40]% higher than those of Chinese imports. This stark differential confirms that imports of Rutile TiO2 from third countries do not cause injury.*

For completeness, the Applicant notes that, in the POI, it imported [Sensitive information removed – Applicant's business data]. The Applicant also imported [Sensitive information removed – Applicant's business operations]. These imports serve to complement UK production and maintain supply continuity. [Sensitive information removed – Applicant's business operations].

B. Evolution in costs

*As **Table 11** in **Section F.1.1** reports, despite inflation, the Applicant reduced its average COGS by 11% over the Injury Period. This underlines how the Applicant has taken control of costs through cost discipline and by controlling certain operational issues that occurred in the past. The evolution in costs is therefore not a cause of injury.*

C. Change in the pattern of demand

*As **Table 4** in **Section F.1.1** reports, UK consumption remained relatively stable throughout the Injury Period. As the market for Rutile TiO2 is like a commodity market, there is no change in the pattern of demand that could be a cause of injury.*

Request for registration

The Applicant hereby requests that the Secretary of State publish a notice requiring HMRC to register imports of Chinese Rutile TiO2 from the day of initiation of the anti-dumping investigation on Chinese Rutile TiO2.[100]

Registration is necessary because, without registration, Chinese Rutile TiO2 producers can seriously undermine the remedial effect of any anti-dumping duties by rapidly building up large inventories in the UK. In view of the history of aggressive and opportunistic trading strategies of Chinese Rutile TiO2 producers in the UK and in other jurisdictions, coupled with large unused production capacities, there is a real

[100] *Paragraph 29(1) of Schedule 4 to the Taxation (Cross-border Trade) Act 2018.*

risk that Chinese Rutile TiO2 producers in fact circumvent any forthcoming anti-dumping for a significant period of time by stockpiling. Similar behaviour occurred in Brazil and the EU, where Chinese TiO2 producers significantly increased their exports as soon as anti-dumping investigations were initiated.

Real-time monitoring of imports by way of registration is key to enabling the TRA to, if imports of dumped Rutile TiO2 continue or even increase, impose anti-dumping duties retroactively.[101]

Declaration

This application is made by, or on behalf of, a UK industry that produces like goods to those that are the subject of this application.

This UK industry has at least 1% market share, taking into account the goods and particular market for those goods.

This application has the support of that UK industry as required in the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019. Specifically, producer support for this application is greater than producer opposition and represents at least 25% of all UK production of the like goods.

The information contained in this application:

- provides evidence that goods have been or are being dumped and/or evidence that subsidised goods have been or are being imported into the UK (as per schedule 1(g) and 2(g) of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019);
- provides evidence that the dumped and/or subsidised goods are causing injury to the UK industry (as per schedule 1(i) and 2(i) of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019);
- is sufficient to initiate an anti-dumping and/or subsidy investigation as per schedule 4 paragraph 9(1)(b) of the Taxation (Cross-border Trade) Act 2018; and
- is accurate and complete.

[101] *Regulation 91 of the D&S Regulations.*

Name:	*[Sensitive information removed – Personal data]*
Company/Association:	*Tronox Pigments UK Limited*
Position:	*[Sensitive information removed – Personal data]*
Company Registration number (if applicable):	*00162303*
Date:	*30 January 2026*
Signature:	X

Checklist

Important

Please ensure that you have completed this application fully and refer to any attached documents using the corresponding appendix reference.

Complete the checklist above, to demonstrate you have covered all of the points, and attach evidence to support your claims and calculations.

Keep a copy of this application for your reference in case any queries arise when we are assessing the application. You will also need to refer to it if we initiate an investigation.

☒ The details of the UK producers making the application and level of UK industry support for the application

☒ The details of all known UK producers/associations of UK producers of like goods

☒ The volume and value of the domestic production of the like goods both by producers making the application and all other known UK producers

☒ Information that the market share requirement is met

☒ A complete description of the imported goods

☒ The names of countries/territories of origin and export of the imported goods

☒ The details of the exporters or overseas producers of the imported goods

☒ The details of the companies or individuals known to be importing the goods

☒ Normal values of the goods ***Dumping applications only***

☒ Export prices of the goods ***Dumping applications only***

☒ Changes in import volumes of the goods

☒ Effects of the imported goods on prices of like goods produced in the UK

☒ Impact of the imports have caused to the UK industry

List of annexes

Annex A.1	*Tronox brochures*
Annex A.1.3	*Import statistics (and Applicant prices)*
Annex A.3.4	*China capacity per method*
Annex C.1.1	*Venator administration*
Annex C.1.2	*Venator administration*
Annex C.1.3	*Venator LB Group deal*
Annex C.1.4	*Hartlepool mail*
Annex D.1.1	*Greatham capacity*
Annex E.2.1	*Particular market situation*
Annex E.2.3.1	*China export stats*
Annex E.2.3.2	*Tronox Brazil data*
Annex E.2.5.1	*World Bank GDP*
Annex E.2.5.2	*World Bank classification*
Annex E.2.5.3	*World Bank life expectancy*
Annex E.2.5.4	*World Bank literacy rate*
Annex E.2.5.5	*World Bank employment*
Annex E.2.5.6	*COMEX Brazil imports*
Annex F.1.1.1	*Venator 2023 Chapter 11*
Annex F.1.1.2	*BoE inflation*
Annex F.1.1.3	*S&P credit downgrade*
Annex F.1.1.4	*Market intelligence provider study*
Annex F.1.1.5	*Market intelligence provider study*
Annex F.1.2.1	*LB Group annual report 2023*
Annex F.1.2.2	*LB Group presentation TZMI*