

21 August 2026

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

via UK Trade Remedies Services

OPEN

Dear Sir or Madam,

Re: AD0086 – Comments on anonymous UK ink producer’s response
Our client: Kronos Group ("Kronos")

Kronos refers to the anonymous UK importer/user’s (“**UK Ink Producer**”) response (“**Response**”) to Kronos’s comments on product scope (“**Scope Comments**”) in the captioned investigation (“**Investigation**”) on UK imports of rutile titanium dioxide (“**TiO2**”) from China.

As detailed below, Kronos considers that the Trade Remedies Authority should reject the UK Ink Producer’s claims in the Response. That is because:

- TiO2 for ink applications is interchangeable with other applications (Section 1);
- There is a viable supply alternative to Chinese producers for TiO2 for ink applications (Section 2); and
- The UK Ink Producer conflates an end use exemption with a product scope exclusion (Section 3).

1. TiO2 for ink applications is interchangeable with other applications

1. In the Response, the UK Ink Producer claims that “[d]edicated ‘ink grades’ do exist in practice” and that such grades “are not interchangeable with the broader TiO2 market.”¹
2. This claim is factually incorrect. As Kronos demonstrated, all of its TiO2 grades for ink applications are also recommended for use in a range of other applications.² Tronox Pigment UK Limited (“**Tronox**”) has demonstrated that this is also true for other producers’ TiO2 grades for ink applications.³ In other words, TiO2 for ink applications is used for a wide range of other applications. TiO2 for ink applications is thus interchangeable with other applications. The UK Ink Producer concedes this, noting that

¹ UK Ink Producer, Response, point 1.2.

² Kronos, Scope Comments, paras. 2-4 and Annexes 1 and 2.

³ Tronox, Comments on pre-sampling questionnaires, paras. 10-16.

“it is correct” that TiO₂ for ink applications “can be used in other applications.”⁴ That is precisely the point. In this regard, Kronos recalls that there is no way to differentiate between TiO₂ for ink applications and other TiO₂ upon customs clearance. While different TiO₂ grades may carry different surface treatments, the underlying compound is the same titanium dioxide, and grade-specific surface treatments cannot be identified or distinguished through visual inspection or standard customs examination. Differentiating between grades would require sophisticated laboratory analysis that is not practicable at the point of customs entry, rendering any purported grade-based distinction unworkable as a matter of customs administration.

3. The UK Ink Producer then claims that “[n]ot all TiO₂ grades are suitable for inks.”⁵ This statement is not unique to inks, as no TiO₂ grade is suitable for all applications – this is precisely why different TiO₂ grades exist. This claim thus confirms the point that Kronos made before: TiO₂ for ink applications is not extraordinary or unique.⁶
4. It follows that, contrary to what the UK Ink Producer claims, TiO₂ for ink applications is interchangeable with other applications.

2. **There is a viable supply alternative to Chinese producers for TiO₂ for ink applications**

5. In the Response, the UK Ink Producer claims that “Kronos’ claim that multiple EU suppliers can serve the ink segment does not reflect market reality.”⁷ Specifically, the UK Ink Producer claims that (a) Kronos does not have capacity to supply the UK ink market; (b) Cinkarna grades are not usable for inks; and (c) Nuova Solmine’s production capacity is low.
6. As an initial point, the UK Ink Producer’s claims are called into question by the tiny size of the UK market for TiO₂ for ink applications. In the EU anti-dumping investigation on TiO₂ from China, the European Commission (“**Commission**”) estimated that the EU market for TiO₂ for ink applications was ~2.5% of the total EU TiO₂ market.⁸ The same is likely true for the UK market. Using Tronox’s estimate of the size of the UK market,⁹ this means that the size of the UK TiO₂ market for ink applications is 1,900-2,300 MT. The EU producers of TiO₂ for ink applications have a combined production capacity of more than 200,000 MT.¹⁰ Total UK consumption of TiO₂ for ink applications is thus ~1% of these producers’ capacity.

⁴ UK Ink Producer, Response, point 1.1.

⁵ UK Ink Producer, Response, point 1.1.

⁶ Kronos, Scope Comments, Section 1.

⁷ UK Ink Producer, Response, point 1.3.

⁸ Recital 486 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 9.1.2025.

⁹ Tronox, Application, Annex 2. The non-confidential range of Tronox’s estimate of the UK TiO₂ market in the period of investigation is 75,000-92,000 MT.

¹⁰ Kronos, Comments, para. 11, which counts 191,000 MT of capacity. In addition, there is 25,000 MT of capacity at Nuova Solmine that came online in April 2026. See below, para. 8.

7. It is thus difficult to lend credibility to the UK Ink Producer's claim that EU producers of TiO₂ for ink applications are not a viable supply alternative to Chinese producers for TiO₂ for ink applications.
8. In any event, the UK Ink Producer's claims concerning EU producers of TiO₂ for ink applications Kronos, Cinkarna, and Nuova Solmine fail.
 - As concerns Kronos, the UK Ink Producer claims that Kronos "has insufficient capacity to support the inks industry in full."¹¹ This is factually wrong. Kronos produces TiO₂ for ink applications at its Nordenheim facility in Germany and its Frederikstad facility in Norway. These facilities have a combined total capacity of almost 100,000 MT/year. The share of that capacity used to produce TiO₂ for ink applications can be simply increased if demand (at fair pricing) increases.
 - As concerns Cinkarna, the UK Ink Producer provides no supporting evidence for its claim that Cinkarna TiO₂ grades are not usable for ink applications. Kronos refers to official information from Cinkarna, which clarifies that (at least) four Cinkarna TiO₂ grades are recommended for use in inks.¹²
 - As concerns Nuova Solmine (which acquired Venator's Italian TiO₂ plant), the UK Ink Producer claims that production capacity is limited as Nuova Solmine only operates one of the plant's three production lines.¹³ Publicly available information demonstrates that this claim is factually incorrect. The second line was opened in April 2026, and Nuova Solmine plans to open the third line by the end of 2026.¹⁴ This means that Nuova Solmine's capacity already doubled from the 25,000 MT mentioned in Kronos's Comments¹⁵ to 50,000 MT today. By the end of the year, Nuova Solmine's capacity will thus likely be 75,000 MT.
9. It follows that, contrary to what the UK Ink Producer claims, there is a viable supply alternative to Chinese producers for TiO₂ for ink applications. Indeed, in the first place, European producers offer a viable supply alternative.
3. **The UK Ink Producer conflates an end use exemption with a product scope exclusion**
10. In the Response, the UK Ink Producer makes multiple claims that are premised on it conflating an end use exemption and a product scope exclusion.¹⁶

¹¹ UK Ink Producer, Response, point 1.3.

¹² Tronox, Comments on pre-sampling questionnaires, para. 13 and Annexes 10-13.

¹³ UK Ink Producer, Response, point 1.3.

¹⁴ Il Tirreno, Grosseto, la Soltiox torna ad assumere: 11 nuovi addetti – E un "sogno" per il futuro, 5 May 2026, available at: <https://www.iltirreno.it/grosseto/cronaca/2026/05/05/news/grosseto-la-soltiox-torna-ad-assumere-11-nuovi-addetti-e-un-sogno-per-il-futuro-1.100865212>.

¹⁵ Kronos, Scope Comments, para. 11.

¹⁶ UK Ink Producer, Response, Section 2.

11. To recall, the Commission did not exclude TiO₂ for ink applications from the scope of the EU anti-dumping duties.¹⁷ Instead, the Commission put in a place a limited (and very rare) exemption for EU imports of TiO₂ used to produce inks, which is subject to strict customs oversight.¹⁸ Crucially, there is no option under UK law for an end use exemption from anti-dumping duties and,¹⁹ in any event, no UK ink producer has even attempted to show that the strict conditions for obtaining an end use exemption are met.²⁰ For these reasons alone, the UK Ink Producer's claims fail. Further, as noted above, there is no way to differentiate between TiO₂ for ink applications and other TiO₂ upon customs clearance.
12. In any event, the UK Ink Producer's key claim is illogical. The UK Ink Producer claims that (a) prices of TiO₂ for ink applications are depressed because of the EU end use exemption; but also (b) there is "[n]o [r]isk of [p]rice [d]umping in [the] [i]nk [s]egment" as "Chinese producers cannot undercut selectively in ink applications."²¹
13. These statements cannot both be true. Prices of TiO₂ for ink applications should have been higher if anti-dumping duties applied (i.e., absent the end use exemption) because the duties would come on top of the prices. If prices of TiO₂ for ink applications are depressed today, that is precisely because Chinese producers dump TiO₂ for ink applications and thus undercut non-Chinese producers. Non-Chinese TiO₂ producers would allocate more TiO₂ production capacity to TiO₂ for ink applications if dumping by Chinese producers was not so prevalent.
14. For completeness, the Commission found dumping from Chinese producers across the board – nothing in its findings suggests that TiO₂ for ink applications was not dumped.
15. In any event, the UK Ink Producer's claim is inapposite because the fact that "prices of TiO₂ for ink applications are not higher than TiO₂ for other applications"²² proves that there is no price differential that would stand in the way of users switching to TiO₂ for ink applications should TiO₂ for ink applications be subject to an end use exemption.²³

¹⁷ Recital 59 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 11.7.2024; Regulation 2025/4, recital 159.

¹⁸ See, e.g., Tronox, Response to anonymous importer/user's response to Tronox comments, Section 1; Tronox, Comments on pre-sampling questionnaires, paras. 25-26 and 41-46.

¹⁹ HMRC, Authorised use: Eligible goods and authorised uses – List of commodity codes of goods eligible for an authorised use procedure, version 2.23 read together with Regulation 20 of The Customs (Reliefs from a Liability to Import Duty and Miscellaneous Amendments) (EU Exit) Regulations 2020 and with HMRC's manual Special procedure: authorised use (end use).

²⁰ Tronox, Response to anonymous importer/user's response to Tronox comments, Section 1; Tronox, Comments on pre-sampling questionnaires, paras. 25-26 and 41-46. See *also* recitals 151, 158-159, 165, 167, 169, and 348 to Commission Implementing Regulation (EU) 2025/1901 of 22 September 2025 imposing a definitive anti-dumping duty and definitively collecting the provisional duty imposed on imports of glyoxylic acid originating in the People's Republic of China, OJ L, 2025/1901, 23.9.2025; Regulation 2025/4, recitals 37-41, 350, 436, and 443.

²¹ UK Ink Producer, Response, points 2.1 and 2.5.

²² Kronos, Scope Comments, para. 6.

²³ Kronos, Scope Comments, para. 7.

16. It follows that, contrary to what the UK Ink Producer claims, there is no legal basis under UK law for an end use exemption for TiO₂ for ink applications and, in any event, the conditions for an end use exemption are not met.²⁴

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²⁴ As the UK Ink Producer's Response does not concern the exclusion of TiO₂ for ink applications from the scope of the Investigation, Kronos has not further addressed this point. For completeness, Kronos recalls that there is also no basis for excluding TiO₂ for ink applications from the scope of the Investigation. See Kronos, Scope Comments.