

21 August 2026

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

via UK Trade Remedies Services

OPEN

Dear Mesdames,
Dear Sirs,

Re: AD0086 – LB Group’s integration of rutile TiO₂ production with LFP battery materials
Our client: Tronox Pigment UK Limited (“Applicant”)

In its submission of 19 August 2026, the Applicant recalled how the massive and ever-increasing overcapacities for rutile titanium dioxide (**“Rutile TiO₂”**) production in China drive the hard dumping of Chinese Rutile TiO₂ on the UK market. The Applicant also provided new evidence that Tinergy Chemical Co. Ltd. (**“Tinergy”**), one of the largest Rutile TiO₂ producers in China, is expanding its production capacity by a massive 400,000 MT/year not because of Rutile TiO₂ demand, but because its Rutile TiO₂ production generates ferrous sulphate (**“FeSO₄”**), a critical material for lithium-iron-phosphate (**“LFP”**) batteries.¹

The Applicant now became aware that, on 11 August 2026, LB Group, China’s largest Rutile TiO₂ producer and a sampled producer in this Investigation,² announced its long-term strategic cooperation with Beijing Easpring Material Technology, a leading company in China’s LFP battery materials industry.³ The cooperation aims to extend, strengthen, and complete the Chinese vanadium-titanium new-energy industrial chain.⁴

LB Group’s announcement confirms that it is leveraging the FeSO₄ generated as a byproduct of Rutile TiO₂ production to develop an LFP battery materials business.⁵ The announced cooperation implements the same circular integrated titanium-phosphorus-lithium value chain mentioned in the Applicant’s submission of 19 August 2026 regarding Tinergy.⁶ This is significant for two reasons.

¹ Applicant, New Chinese Rutile TiO₂ capacity expansion, 19 August 2026.

² TRA, AD0086, Notification of sample, 8 April 2026.

³ Reuters, Beijing Easpring Material Technology Co Ltd, **Annex 1**.

⁴ LB Group, “LB Group and Easpring Technology Establish Long-Term Strategic Cooperation,” 11 August 2026, **Annex 2**.

⁵ LB Group, “LB Group and Easpring Technology Establish Long-Term Strategic Cooperation,” 11 August 2026, **Annex 2**.

⁶ See Applicant, New Chinese Rutile TiO₂ capacity expansion, 19 August 2026.

First, LB Group publicly confirms that the commercial logic of its Rutile TiO₂ production is not driven by demand for Rutile TiO₂. Like Tinergy, LB Group is transforming its business model so that the commercial value of Rutile TiO₂ production increasingly lies in the production of byproducts, in particular FeSO₄.⁷ Thus, sustained losses on sales of Rutile TiO₂ are of limited importance to LB Group because the FeSO₄ byproduct revenue stream generates profit.

Second, LB Group openly acknowledges that it is integrating “local inefficient TiO₂ capacity” with battery-material resources to build what it calls a “closed-loop industrial chain.”⁸ In other words, LB Group says that it will use unprofitable Rutile TiO₂ production capacity in China to produce ever more Rutile TiO₂ because surging demand for battery materials demands byproducts.⁹ China’s largest Rutile TiO₂ producer thus has a structural incentive to continue producing and diverting excess Rutile TiO₂ – for which there is no demand – to export markets such as the UK at heavily dumped prices.

As the Applicant explained in its submission of 19 August 2026 regarding Tinergy, this further confirms that Chinese Rutile TiO₂ pricing is entirely and increasingly disjointed from the realities of a Rutile TiO₂ market.¹⁰ For this reason, the TRA should ensure that it recommends anti-dumping duties at the highest possible level.

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⁷ See Applicant, New Chinese Rutile TiO₂ capacity expansion, 19 August 2026.

⁸ LB Group, “LB Group and Easpring Technology Establish Long-Term Strategic Cooperation,” 11 August 2026, **Annex 2**.

⁹ See Bloominglobal, “China’s Titanium Dioxide Industry Faces Challenges in 2025 with Production Capacity Approaching 7 Million Tons,” 24 December 2024, **Annex 3**; EnergyTrend, “Chinese material suppliers are expanding production capacity for iron phosphate and LFP due to surging demand,” 5 May 2022, **Annex 4**.

¹⁰ See Applicant, New Chinese Rutile TiO₂ capacity expansion, 19 August 2026.