

8 September 2026

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

via UK Trade Remedies Services

OPEN

Dear Mesdames,
Dear Sirs,

**Re: AD0086 – Response to Billions Europe’s submission of 12 August -
Addendum**
Our client: Tronox Pigment UK Limited ("Applicant")

On 1 June 2026, the Applicant submitted comments to the Trade Remedies Authority ("**TRA**") regarding the stockpiling of rutile titanium dioxide ("**Rutile TiO2**") originating from China and the need for swift and strong action in the captioned investigation ("**Investigation**").

On 12 August, Billions Europe, a subsidiary of Lomon Billions Group ("**LB Group**") submitted a response to the Applicant’s comments, denying that Chinese Rutile TiO2 producers are stockpiling Rutile TiO2 in the United Kingdom.

On 1 September, the Applicant submitted a response to LB Group’s comments.

With this submission, the Applicant complements its 1 September submission as concerns LB Group’s claim that the massive volume of UK imports of Rutile TiO2 have, for LB Group, been “driven by actual customer demand.”¹

Information now available to the Applicant shows that UK demand for Rutile TiO2 did not increase since the initiation of the Investigation. To the contrary: demand decreased sharply.

[CONFIDENTIAL – Information about the decrease in UK demand for coatings since initiation of the Investigation].

[CONFIDENTIAL – Information about the evolution in the Applicant’s UK sales].

¹ Billions Europe, Response to the Applicant's submission on the importance of swift and strong action, 12 August 2026, Section 1.

This data means that either LB Group's customers are stockpiling Rutile TiO₂ and/or that LB Group is grabbing market share from other producers. In either scenario, this behavior undermines the effectiveness of any anti-dumping duties that the TRA may recommend and further delays the protection that duties would bring for the UK Rutile TiO₂ industry.

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