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19th October 2026

Broadway Colours Ltd

Response to the TRA's Statement of Essential Facts — AD0086

Investigation into imports of rutile titanium dioxide from China

Broadway Colours Ltd welcomes the opportunity to comment on the Trade Remedies Authority's initial findings and proposed anti-dumping measure concerning imports of rutile titanium dioxide from China.

Broadway Colours is a UK manufacturing SME based in Suffolk, employing approximately 60 people. We manufacture colour masterbatch, additive masterbatch, compounds and rotational moulding powders for industrial customers. Titanium dioxide is an important raw material in our manufacturing processes, contributing to the performance, opacity and appearance of products supplied to our customers.

We recognise the importance of fair competition and a viable domestic titanium dioxide production industry. However, we are concerned that the proposed measure could impose a significant and disproportionate cost on downstream UK manufacturers, particularly SMEs with limited ability to absorb substantial increases in raw material costs.

1. Impact on downstream manufacturers

Broadway Colours consumes approximately 120 tonnes of titanium dioxide annually. The proposed measure could therefore have a material and recurring effect on our manufacturing costs.

At the proposed minimum duty rate of £665 per tonne, the additional cost would be £79,800 per year if the measure applied in full to our entire annual consumption. This is an illustrative estimate; the actual impact would depend on the origin of individual purchases, the final measure, and the applicable customs treatment.

For a manufacturing SME, an increase of this scale is commercially significant. The additional cost would need to be absorbed, passed on to customers, or managed through changes to sourcing and product formulations.

Our ability to pass on these increases is constrained by customer contracts, competitive pressures, and the availability of alternative materials. There is a risk that higher input costs could weaken the competitiveness of UK-manufactured products, particularly where customers can source finished goods or compounds from overseas markets.

2. Availability and cost of alternative supply

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We have reviewed alternative sources of titanium dioxide as part of our response to the proposed measure.

Our initial market assessment indicates that alternative material is available, but at a substantial price premium to our current sourcing arrangements. UK-produced options are particularly expensive, with current indicative offers exceeding £3.00/kg.

The availability of an alternative source does not mean that the material represents a commercially viable substitute. Downstream manufacturers must also consider technical suitability, consistency of quality, supply capacity, lead times and the cost of qualifying alternative grades.

We are concerned that the proposed measure could materially increase the cost of our raw materials without providing access to technically suitable alternatives at commercially comparable prices. This could place additional pressure on UK manufacturing businesses and their customers.

3. Wider UK economic impact

The consequences of the proposed measure extend beyond the direct importer of titanium dioxide. Manufacturers using this material are part of wider UK supply chains, supplying customers who themselves face international competition.

Where increased raw material costs cannot be recovered in full, the effects may include reduced margins, higher prices to customers, loss of competitiveness and pressure on investment and employment.

We therefore consider it important that the TRA assesses the effects of the proposed measure across the downstream supply chain, including the cumulative impact on SMEs that depend on titanium dioxide as a key production input.

We are particularly concerned about the potential for anti-dumping duties to be applied retrospectively to imports made before the outcome of the investigation was known.

As a downstream manufacturer, Broadway Colours purchases titanium dioxide as a raw material and incorporates it into a wide range of masterbatch, compound and other product formulations. The material is not simply resold to customers; it becomes an input into finished products, often at relatively low inclusion rates but across a very large number of formulations and customer orders.

Our products are frequently supplied under firm-price agreements or against customer orders for which pricing has already been agreed. We cannot retrospectively increase the selling price of products already manufactured and sold to recover an unforeseen duty imposed on the raw material after purchase.

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Consequently, any retrospective duty would represent a direct and potentially unrecoverable cost to our business. This is materially different from a situation in which an importer holds unsold stock or can adjust its selling price before the goods are supplied.

The complexity of our product portfolio makes retrospective recovery particularly impractical. Titanium dioxide is used across an extensive range of formulations, meaning that identifying the precise downstream products affected, allocating the additional duty accurately and seeking recovery from individual customers would be extremely difficult, and in many cases contractually impossible.

We therefore ask the TRA to consider the consequences of retrospective duty collection for downstream manufacturers. Businesses should not be exposed to substantial, unanticipated costs on imports made in good faith before the final measure and its financial implications were established, where those costs cannot subsequently be recovered through existing customer contracts.

We request that the TRA carefully considers the fairness and proportionality of any retrospective application, including the risk of imposing unrecoverable costs on downstream UK manufacturers and the wider supply chains they support.

4. Request to the TRA

We respectfully ask the TRA to:

1. Give appropriate weight to the impact of the proposed measure on downstream UK manufacturers, particularly SMEs operating in competitive markets.
2. Assess the proportionality of the proposed duty considering the cost and practical availability of alternative supply.
3. Consider the potential consequences for UK manufacturing competitiveness, customer pricing, supply-chain resilience, and employment.
4. Ensure that the final recommendation reflects the wider economic effects across the supply chain, alongside the interests of domestic titanium dioxide producers.

Broadway Colours supports fair competition and a sustainable domestic supply base. Our concern is that a measure intended to protect UK production could also impose substantial recurring costs on other UK manufacturers that rely on this material and have limited scope to absorb or recover those costs.

We ask that these downstream impacts are carefully considered before a final recommendation is made.