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The Case Team for AD0086
Trade Remedies Authority

26 October 2026

Dear Case Team,

AD0086 – Rutile titanium dioxide from the People's Republic of China: comments on the Statement of Essential Facts

The British Plastics Federation (BPF) represents the UK plastics industry, with over 600 member firms across the whole supply chain. Titanium dioxide (TiO2) is the white pigment in most white and coloured plastic products. For makers of white masterbatch (the concentrated colour pellets used to colour plastics) it is the main raw material. We comment on behalf of our members who make, compound and distribute plastics. Our membership includes companies with differing views on this investigation.

Our position in brief. We are not asking the TRA to drop its findings. We are asking it to fill gaps in its analysis and, if it recommends a duty, to design it so that it does not place an unfair burden on UK manufacturers. The TRA's own figures show that for every £1 the UK producer would gain, users would lose between £3.36 and £18.88 (paragraph 706).

We ask the TRA to:

1. Confirm that duties will not be backdated.
2. Assess the effect on plastics manufacturers separately, as it has done for ink makers.
3. Take into account the restart of the Greatham plant.
4. Set up a practical way to exempt grades of TiO2 that are not made in the UK.
5. Correct the data error listed below.

1. Plastics manufacturers would bear a heavy cost

The Statement of Essential Facts (SEF) says TiO2 makes up about 6% of downstream companies' turnover (paragraph 688). In plastics the share is far higher. White masterbatch is typically 40–70% TiO2, and one company in the TRA's survey reported TiO2 at 78% of its product cost. The lower proposed duty rate would add up to around £560 to each tonne of white masterbatch. The downstream businesses in the TRA's sample employ around 6,400 people and generate £381m a year in value added; the applicant employs 357 people and generates £45m (paragraphs 683 and 736).

The duty is unlikely to bring business back to UK producers. One member has been offered UK-made TiO2 at more than £3.00 per kg. Chinese TiO2 cost about £1.66 per kg in 2025 (paragraph 102), so even with the duty it would cost about £2.47 per kg, and imports from other countries cost 50–60% more than Chinese TiO2 (paragraph 370). Buyers who stop buying from China are therefore more likely to turn to other overseas suppliers than to UK producers.

The duty would also leave UK manufacturers worse off than overseas competitors. Imported white masterbatch, which contains less than the 80% TiO2 covered by the measure, and imported PVC window profiles and mouldings would not bear the proposed duty on the TiO2 they contain, while UK manufacturers would pay it on their main raw material. Chinese TiO2 also reaches UK window-profile

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makers in compounded PVC additives, so the view on the file that PVC would be unaffected is inaccurate. *Members can provide their figures to the case team in confidence.*

2. The assessment of future harm is incomplete

The TRA found no current injury to the UK industry, so its case rests on the threat of future injury. The Greatham plant restarted in August 2026 under new ownership and aims to produce 150,000 tonnes a year by early 2027 (paragraph 86). That is about twice the UK's annual use of TiO2 (paragraph 570), and its output would not be subject to the duty. Yet the SEF says no other factors affect the threat (paragraph 646). Competition from Greatham, rather than imports, could explain future pressure on the applicant, and the plant means UK production would continue without a duty, which the TRA's model does not reflect (paragraph 708). We ask the TRA to take it into account and, if it imposes a duty, to review it once the Greatham site reaches full output.

3. Duties should not be backdated

The applicant has asked for the duty to be backdated to cover earlier imports (retrospective duty). As we understand UK law, a duty can be backdated only if a provisional (temporary) duty has first been imposed, and then by no more than 90 days before that provisional duty began (Taxation (Cross-border Trade) Act 2018, Schedule 4, paragraph 19; Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019, regulations 91 and 92, as amended). No provisional duty has been proposed, so we ask the TRA to confirm that it will not recommend backdating. Our members sell on fixed-price contracts, so they could not pass a backdated duty on to customers, and it would fall directly on UK manufacturers.

4. Not all TiO2 is the same

This is critical. UK prices were 46.43% above the landed price of Chinese TiO2 (paragraph 479), yet UK producers still supplied an estimated 30–50% of the TiO2 sold in the UK (paragraph 87). Buyers do not treat all grades as interchangeable: they choose on quality, product approvals and reliability, not price alone. In its injury margin calculation, the TRA combined the two production methods, the sulphate and chloride routes, as if they were one product (paragraph 73). We ask it to confirm whether its undercutting comparison did the same and, if so, whether the finding holds when they are compared separately. The TRA accepts that exempting ink grades would reduce harm but says it has not found a practical way to do so (paragraph 741). Others have: the EU exempts TiO2 used in white printing inks,[1] and India's 2025 duty exempted several uses. We ask the TRA to set up a similar scheme that can also cover plastics grades not made in the UK, where companies provide evidence.

5. Data correction

Paragraphs 100–104 appear to show kilograms as tonnes: Chinese imports in 2025 were about 18,543 tonnes, not 18.5 million. As a result, paragraph 106 overstates the UK's share of China's output tenfold (0.39–0.42%, not 3.9–4.2%). Please confirm whether this affected the TRA's calculations.

I would welcome the opportunity to discuss these points with the case team.

Yours faithfully,

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Public and Industrial Affairs Manager
British Plastics Federation

[1] Commission Implementing Regulation (EU) 2025/4, Article 2.