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

23rd October 2026

Dear Sir or Madam

Re: AD0086 – Response to Statement of Essential Facts CD-01771 6th October 2026

1. **Like Goods Assessment (Section D3.1)**

   We completely concur with Point 58 and submit the following to clearly demonstrate that sulphate ink grade Ti02 has different physical properties to chloride rutile titanium dioxide manufactured by UK industry or from the PRC:

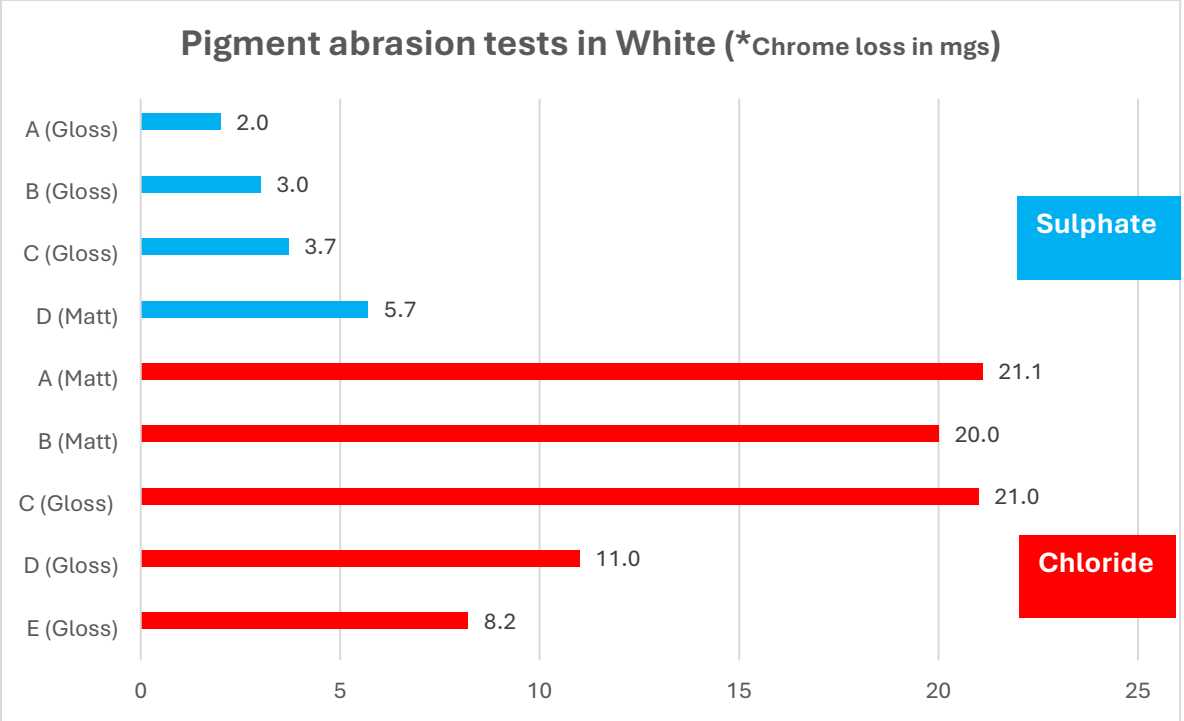
Printing Ink Analysis - Abrasivity testing (Confidential)

Printing inks have a key requirement for low abrasivity. It is essential for the longevity of printing and ancillary equipment parts including chromed coppered printing cylinders, doctoring blades, aniloxes and printing plates.

Titanium Dioxide pigment used in the manufacture of high opacity printing inks typically has a greater effect on wear characteristics than that of coloured pigments. It is also known that the grade of Titanium Dioxide can influence wear. Chloride TiO2 grades typically have higher abrasivity in low viscosity liquid printing inks (solvent and water-based technologies) compared to those manufactured using the Sulphate process.

Tests have been made comparing the impact of various commercially available grades of Titanium Dioxide in a Solvent Based white ink formulation recommended for and widely used in Flexible Packaging printing applied using Rotogravure and Flexographic print techniques. In this testing, the formulation substitution was made at a 1:1 change with each TiO2 grade.

Cylinder and doctor blade wear tests were carried out and measurements collated (see table below).



**Test method 500,000 rotations each ink with fresh doctor blade and coppered chrome surface.*

See pdf appendix Daetwyler ATII test equipment. (Chrome removal (mg)

Summary of Findings

Sulphate grade TiO2 exhibits consistently low abrasivity (<6mg of chrome removed).
Chloride grade TiO2 exhibits consistently higher abrasivity. (8-22mg of chrome removed).

Use of Chloride grade TiO2 contributes to significantly greater wear on printing press machine parts such as printing cylinders and doctor blades. This is also associated with an unacceptable build-up of metal fines in ink ducts; causing premature equipment wear leading to the loss of printing quality.

None of [Redacted]'s customers would use chloride grade Ti02 because of outlined impacts on machinery, both in terms of cost but also in terms of downtime by changing cylinders. Presses would need to be regularly cleaned to ensure no metallic particulates could be found within the food packaging.

All the above would reduce efficiency & cost competitiveness of our customers.

2. **Consideration of products used in the production of white graphic ink (Section H1)**

   In paragraph 663-665 the TRA considered whether to omit four ten-digit commodity codes that specify an end use of white graphic ink production; and concluded that this could potentially undermine the effectiveness of anti-dumping duties that are recommended for the other, non-ink specific, commodity codes.

   [Redacted - Confidential] is requesting (like in Europe), that a specific ink grade exemption licence be granted instead **by application (at end-user level only)**.

There is thus no feasible risk of evasion of an anti-dumping duty exemption granted specifically for ink applications by diverting the product to non-ink uses. This is because such exemptions are not granted generically but are strictly linked to the declared end-use and subject to prior verification.
In practice, exemptions for ink applications are awarded only after preliminary investigations by customs authorities, which include the issuance of ad hoc authorisations to verified ink manufacturers. These authorisations confirm both the legitimacy of the applicant and the intended industrial use of the material.

As a result, a non-ink manufacturer cannot procure TiO_2 under an ink-specific exemption. Without the required preliminary approval and authorisation from the relevant customs authorities, such a company would not qualify for the exemption. Consequently, the regulatory framework ensures that only bona fide ink manufacturers can benefit from the duty exemption, effectively preventing misuse or diversion.

This end-use exemption would not cause a significant burden to HMRC as there are only a limited number of UK-based ink suppliers, who manufacture titanium dioxide-based inks in the United Kingdom.
[REDACTED – LIST OF UK BASED INK SUPPLIERS BY NAME]

3. Other factors the TRA considers relevant (Section I7)

In paragraph 724 the "TRA has assessed the ink sector in isolation as not especially vulnerable to economic shocks, with rutile titanium dioxide being only somewhat important to the firms".

This is not true for [Redacted - Confidential]. This facility only produces [Redacted - Confidential]. Total production quantity is [Redacted - Confidential]. Total revenue is [Redacted - Confidential].
White inks represent [Redacted - Confidential].
Sales of white inks represents [Redacted - Confidential].

The site employs [Redacted - Confidential] employees with [Redacted - Confidential] other employees supporting the site remotely. There is also planned investment of [Redacted - Confidential] per year; which would support local businesses (engineering/equipment manufacturers).

The anti-dumping duty would represent an additional cost to the UK business of [Redacted - Confidential]; which would make us completely uncompetitive versus European competition (who already have anti-dumping ink exemption licences).

The likely result of an anti-dumping duty being applied could be [Redacted - Confidential].

In conclusion, [Redacted – Confidential] requests that the TRA re-considers their recommendation for an anti-dumping duty for inks manufacturers; to safeguard production facilities and protect jobs in the UK; which ultimately contribute to the wider UK economy.