31 October 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 – *Addendum* to comments on the importance of swift and strong action and comments on Statement of Essential Facts**
Our client: **Tronox Pigment UK Limited ("Applicant")**

On 1 June 2026, the Applicant submitted comments highlighting the concerning stockpiling of rutile titanium dioxide ("**Rutile TiO2**") originating from China on the UK market and the resultant need for swift and strong action in the captioned investigation ("**Investigation**").

On 25 October 2026, the Applicant submitted comments on the Trade Remedies Authority's ("**TRA**") Statement of Essential Facts ("**SEF**") in the Investigation. The Applicant demonstrated, among others, that the threat of injury the TRA found to exist has meanwhile materialized. To minimize the injury that the Applicant is suffering and will continue to suffer until the imposition of definitive anti-dumping duties ("**ADDs**"), the Applicant requested the TRA to urgently adopt a Provisional Affirmative Determination ("**PAD**") and recommend provisional ADDs.

With this submission, the Applicant supplements its submissions of 1 June 2026 and 25 October 2026 with the most recent data on Chinese exports of Rutile TiO2. This data, when compared to Chinese exports to other jurisdictions in which ADDs have been imposed, shows that Chinese exporters will continue to flood the UK market to stockpile massive volumes of Rutile TiO2 ahead of the ADDs that the TRA intends to recommend.

As *Figures 1* to *4* demonstrate, Chinese exporters sharply increased Rutile TiO2 exports following initiation of the anti-dumping investigations in the European Union, Brazil, India, and Saudi Arabia. Only the imposition of provisional or definitive ADDs stemmed that flood. As *Figure 5* shows, history is repeating itself in the context of the Investigation: the latest data shows that Chinese exporters continue to sharply increase Rutile TiO2 exports to the United Kingdom. They do so at a much more pronounced rate than in the other jurisdictions. This trend is particularly visible in August and September 2026, the last two months for which data is available.

The attractiveness of the UK market, partially caused by trade diversion, is clear from the huge increase of Rutile TiO2 exports from China since the initiation of the investigation. In the six months before and after the initiation of the anti-dumping investigations, Chinese exports to each jurisdiction increased by the following percentages:

- European Union: 37%
- Brazil: 33%
- India: 29%
- Saudi Arabia: 42%
- United Kingdom: **97**%

In other words, the still unprotected UK market is simply being flooded with Chinese Rutile TiO2.

Figure 1 - Chinese exports of Rutile TiO2 to the EU (MT)[1]

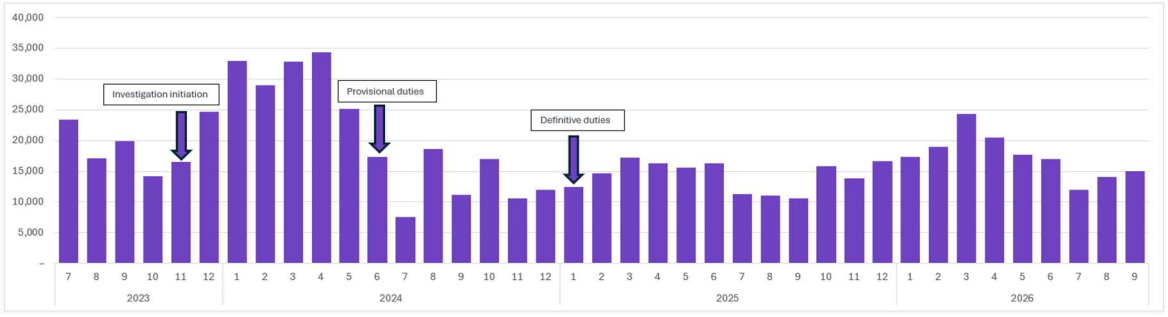


Figure 2 - Chinese exports of Rutile TiO2 to Brazil (MT)[2]

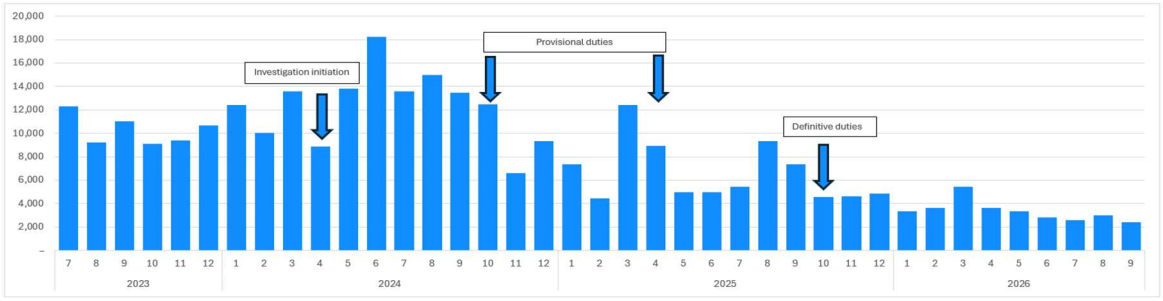
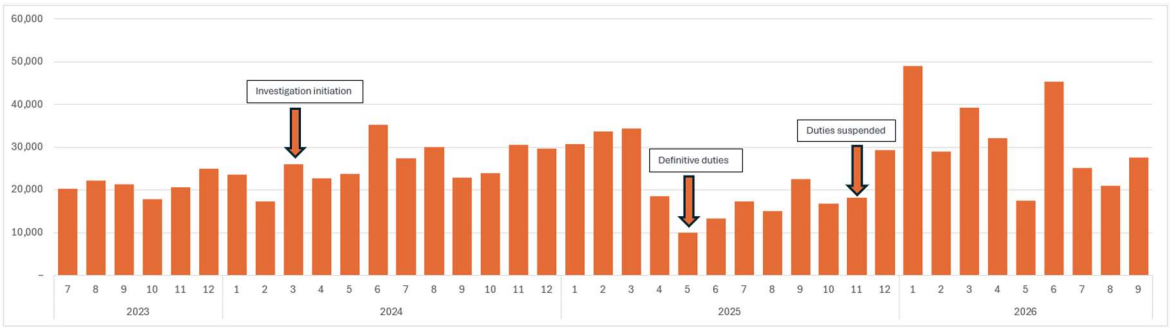


Figure 3 - Chinese exports of Rutile TiO2 to India (MT)[3]



1 Source: Chinese export statistics.

2 Source: Chinese export statistics.

3 Source: Chinese export statistics.

Figure 4 - Chinese exports of Rutile TiO2 to Saudi Arabia (MT)[4]

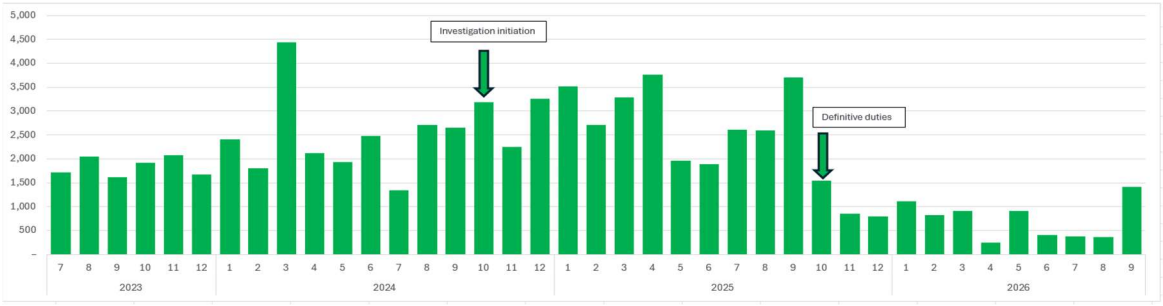
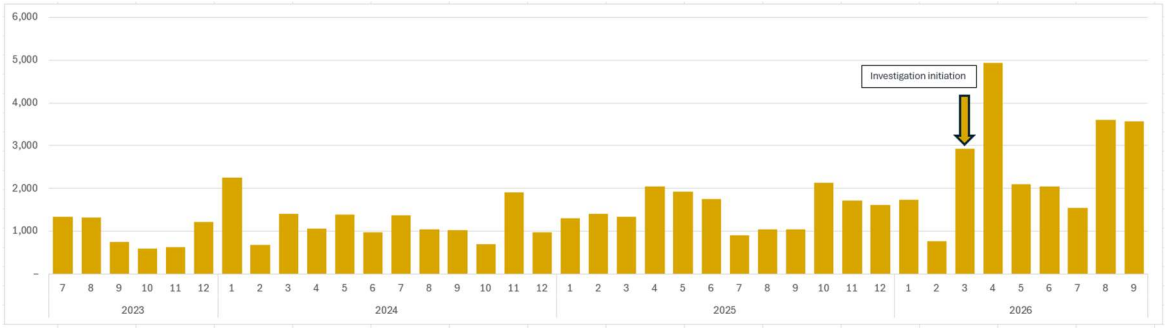


Figure 5 - Chinese exports of Rutile TiO2 to United Kingdom (MT)[5]



The massive volume of Chinese producers' Rutile TiO2 exports to the UK market, in particular in the most recent months, will materially delay the real-world impact of the ADDs that the TRA intends to recommend. These volumes will cause further injury to the Applicant long after the ADDs are in place. This is yet more evidence that the TRA should adopt a PAD and recommend provisional ADDs without further delay.

* * *

4 Source: Chinese export statistics.

5 Source: Chinese export statistics.