Reference: Case No. AD0086 - Rutile Titanium Dioxide from China

To Whom It May Concern,

I am writing in response to the proposed tariff measures relating to imports of rutile titanium dioxide from China.

As an employee of a supplier of titanium dioxide to a wide range of UK manufacturing industries, I believe the proposed tariffs will have significant adverse consequences for UK businesses, their employees, and the competitiveness of downstream industries that rely on this essential raw material.

The customer base of the company I work for is diverse and largely comprised of small and medium-sized enterprises operating in highly competitive markets. These companies have already had to adapt to increasing regulatory and operating costs, including those associated with UK REACH compliance and some of the highest industrial energy costs in the developed world. Despite these challenges, many remain internationally competitive through innovation, technical expertise, and investment in high-value manufacturing.

The proposed tariffs would, in my opinion, increase the cost of a critical raw material used extensively across the paints, coatings, adhesives, paper, plastics, and construction sectors. Such measures would place additional pressure on manufacturers that are already facing significant cost challenges and would inevitably reduce their ability to compete both domestically and in export markets.

As I understand, the UK paints and coatings industry alone supports over 300,000 jobs across production and application. The sector remains an important contributor to UK manufacturing and trade. Titanium dioxide is a key ingredient in many coating formulations and represents a significant proportion of raw material costs. Any substantial increase in the cost of titanium dioxide will directly affect production economics, reducing competitiveness against overseas producers.

I understand from my trade body, at present UK paint and coatings manufacturers are able to produce more material than is required for domestic consumption, exporting around ~30% a significant proportion of their output. However, the introduction of tariffs would remove one of the few remaining cost advantages available to UK producers. Given the higher energy and operating costs already borne by UK manufacturing facilities, there is a substantial risk that production volumes will increasingly be transferred to facilities located elsewhere, particularly within the EU, where many multinational companies already maintain manufacturing operations.

I understand from my trade body, the paper industry has already undergone substantial rationalisation in recent decades, with employment levels significantly reduced. While anatase titanium dioxide used in paper production is outside the scope of the proposed measures, rutile grades remain important for coated paper applications. Increasing the cost of these materials will further reduce the competitiveness of UK paper producers and their ability to compete in export markets.

Similarly, the UK adhesive industry comprises numerous manufacturers and supports approximately 12,000 jobs across production and application. Titanium dioxide is used in a range of adhesive products, and manufacturers already face intense competition from imported materials and products. The proposed tariffs risk undermining recent progress made by UK producers and may accelerate the transfer of production to lower-cost regions.

The wider context is also important. UK industrial electricity prices remain substantially higher, to my belief, than those faced by many international competitors, including China and the United States. As titanium dioxide production and many downstream manufacturing processes are energy-intensive, UK manufacturers are already operating at a cost disadvantage. Restricting access to competitively priced raw materials will further weaken their position and increase inflationary pressure throughout the supply chain.

While I understand the objective of supporting domestic titanium dioxide production, I believe the proposed measures risk causing greater harm to the broader manufacturing economy than the benefits they are intended to deliver. The industries consuming titanium dioxide collectively employ many hundreds of thousands of people and generate significant economic value. Any reduction in their competitiveness would have consequences extending far beyond the relatively small number of jobs directly associated with domestic titanium dioxide production.

In my view, the proposed tariffs are unlikely to secure the long-term future of UK titanium dioxide production if the underlying competitive challenges facing UK manufacturing, particularly energy costs and regulatory burdens, remain unaddressed. Instead, there is a significant risk that downstream production will relocate to other regions, resulting in reduced investment, lower output, and job losses throughout the wider economy.

I therefore urge careful consideration of the broader economic impacts of the proposed measures and their potential effect on the competitiveness of UK manufacturing as a whole.