



# Registration form for interested parties and contributors

Case No.: AD0086

Anti-dumping investigation into rutile titanium dioxide originating in the People's Republic of China

Completed on behalf of (provide the name of your business or organisation):	<b>China National Coatings Industry Association ("CNCIA")</b>
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**Note:**

Please provide **two copies of your response to this form: a confidential and a non-confidential version**. Both copies must be returned to the TRA using the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)).

When you have completed each form, indicate the **confidentiality** status of the document by placing an  in the relevant box below and in the header of the form. We strongly recommend this questionnaire be completed on a computer, so this step is easy to complete.

- Confidential
- Non-confidential (will be made available on the public file: <https://www.trade-remedies.service.gov.uk/public/cases/>)

Deadline for response:	18 March 2026
Case team contact:	<a href="mailto:AD0086@traderemedies.gov.uk">AD0086@traderemedies.gov.uk</a>



## Introduction

### Registration of interest to the investigation

We invite interested parties and contributors to **register** their interest in this investigation by **completing the relevant sections** as indicated in this form **and submitting the completed form** using the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)).

An interested party is either:

- a government of the foreign country or territory subject to the investigation;
- an overseas exporter, an overseas producer or an importer of the goods subject to the investigation;
- a UK producer of goods that are like the goods subject to the investigation; or
- a trade or business association representing one or more of the above parties.

A contributor is a person or organisation who is not an interested party but who wants to register so that they can participate in an investigation.

### Scope of the investigation

Goods concerned	Rutile titanium oxides in pigments and preparations based on rutile titanium dioxide, containing a minimum of 80% by weight of titanium dioxide calculated on the dry matter and having all types of particle sizes, classified under Chemical Abstracts Service Registry Numbers 12065-65-5 and 13463-67-7.
Period of investigation (POI)	1 January 2025 – 31 December 2025

For further details, please refer to the *Notice of Initiation* on the public file: <https://www.trade-remedies.service.gov.uk/public/cases/AD0086>.

### Completing this registration form and pre-sampling questionnaire

To register to this case, you need to provide two copies of your response to this form: a confidential and a non-confidential version. Your non-confidential version should be as similar as possible to your confidential version except for the redaction of the confidential information.

Both copies must be returned to the TRA by **18 March 2026** using the Trade Remedies Service ([www.trade-remedies.service.gov.uk](http://www.trade-remedies.service.gov.uk)).



The non-confidential version of your registration form and pre-sampling questionnaire may be placed on the public file: <https://www.trade-remedies.service.gov.uk/public/cases/>.

It is your responsibility to ensure that the non-confidential version does not contain any confidential information, which includes personal contact information, names and signatures. Please see the [TRA's public guidance](#)<sup>1</sup> for further information on providing confidential information and non-confidential summaries.

All information provided to the TRA in confidence will be treated as confidential in accordance with regulation 45 of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 (the Regulations) and only used for this investigation (except in limited circumstance as permitted by regulation 46 of the Regulations) and will be stored in protected systems.

## Request to complete a detailed questionnaire

If, on the basis of the information provided in this form, we determine that you are an overseas exporter or an importer of the goods subject to the investigation or a UK producer of goods that are like the goods subject to the investigation, we will ask you to complete a detailed questionnaire to inform this investigation.

If we consider it appropriate, we may only ask a sample of overseas exporters, importers and/or UK producers to complete a detailed questionnaire. By submitting this completed registration form and pre-sampling questionnaire, you agree that you may be included in any such sample.

If your business is included in the sample, you will be asked to respond to the questions in the detailed questionnaire and to support the TRA in verifying your responses. This may involve the TRA carrying out a verification visit to your premises.

If you are an overseas exporter and indicate that you do not agree to possible inclusion in a sample, your business may be deemed not to have cooperated in the investigation. The TRA will base its findings for non-cooperating parties on facts available. This may result in an outcome that is less favourable to your business than if it had cooperated.

If we decide to sample overseas exporters, and your business is not selected for this sample, you may submit a request to us to calculate individual margins for your business. We will accept your request providing that:

- you submit the required information on time; and

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<sup>1</sup> <https://www.gov.uk/government/publications/the-uk-trade-remedies-investigations-process/the-tras-investigation-process>



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- the number of exporters subject to examination is not so large that complying with the request would be unduly burdensome and risk preventing the timely completion of the investigation.



## Section A: About your business or organisation

### A1. Your business' or organisation's activities

1. To determine your business' or organisation's role for the purpose of this investigation, please select all of the following options that are applicable to your business or organisation. Please refer to the period of investigation in the POI defined on page 2.

- [A1.1] During the POI, we produced the goods concerned in the People's Republic of China.  
**Note: Please complete sections A2 and B.**
- [A1.2] During the POI, we directly exported the goods concerned from the People's Republic of China to the UK.  
**Note: Please complete sections A3 and B.**
- [A1.3] During the POI, we indirectly exported the goods concerned from the People's Republic of China to the UK via a third party (located either in the People's Republic of China or a third country not subject to the investigation).  
**Note: Please complete sections A3 and B.**
- [A1.4] During the POI, we imported the goods concerned originating in the People's Republic of China to the UK.  
**Note: Please complete sections A4 and B.**
- [A1.5] During the POI, we produced goods that are like the goods concerned in the UK.  
**Note: Please complete sections A5 and B.**
- [A1.6] Other.  
**Note: Please complete section B.**

2. If you selected 'Other' [A1.6], please describe the activity/activities of your business or organisation and your business' or organisation's interest in this investigation in the field below.

**RESPONSE: CNCIA is the business association representing the Chinese producers and exporters of the product concerned.**



- 3. Indicate whether your company is a member of any representative organisations (e.g. a trade body or chamber of commerce). If so, please provide a copy of any relevant documentation.

**RESPONSE:** Not applicable; CNCIA is the business association representing the Chinese producers and exporters.

## A2. Production and domestic sales of the goods concerned

Complete this section if you indicated under A1 that you are a producer of the goods concerned in the People’s Republic of China.

**RESPONSE:** This section is not applicable to CNCIA.

- 4. Please refer to the description of the goods concerned on page 2. In the field below, describe the goods that you produce and that fall within the description.

- 5. Please provide your business’ total production volumes and production capacity for the goods concerned during the period of investigation in the POI in the table below.

Total production volume in the POI (metric tonnes)	
Total production capacity in the POI (metric tonnes)	

Consider providing these figures in ranges in your non-confidential version of this form.

- 6. Please give details of all associated parties involved with the business in the production and sales (export and/or domestic) of the goods concerned during the period of investigation. Both natural persons (individuals) and legal persons (e.g. companies) are considered to be associated where they meet the definition of ‘Related Persons’ in [regulation 128 of the Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#).

Company name	Company location (city, country)	Activities	Relationship

Add additional rows as required



Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

7. Please provide the total of your domestic sales volumes and sales values of the goods concerned produced by your business during the POI in the table below.

Total domestic sales volume in the POI (metric tonnes)	
Total domestic sales value in the POI (£ GBP)	

Consider providing these figures in ranges in your non-confidential version of this form.

8. Please state the production process(es) you use (chloride and/or sulphate). Were there significant fluctuations in major input costs (such as raw materials or energy) across the POI, which had a material impact on the overall cost to make of the goods? If yes, please provide details of these fluctuations.

9. Is your company or any of your associated parties related to any company in the UK, particularly any of the UK producers and/or importers of the goods that are like the goods concerned in the UK?

10. Do you produce and/or sell other goods for the UK market other than the goods concerned?



### A3. Direct and indirect exports of the goods concerned

Complete this section if you indicated under **A1** that **you are an exporter of the goods concerned from the People’s Republic of China.**

**RESPONSE:** This section is not applicable to CNCIA.

11. If you are not the producer of the goods concerned that you export to the UK, please provide details for your suppliers of the goods concerned and indicate whether these are the producers of the goods concerned in the table below.

Company name	Company location (city, country)	Relationship to your company	Producer (Y/N)

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA’s public guidance](#).

12. Please provide the total of your direct and indirect export volumes and export values of the goods concerned to the UK during the POI in the table below.

Note: Exports to the UK via a third party (whether or not associated to your business), which is located in the People’s Republic of China or a third country, are to be considered indirect exports.

Total direct export volume in the POI (metric tonnes)	
Total indirect export volume in the POI (metric tonnes)	
Total direct export value in the POI (£ GBP)	
Total indirect export value in the POI (£ GBP)	

Consider providing these figures in ranges in your non-confidential version of this form.

13. If you exported the goods concerned to the UK via third parties, please provide details for these parties below.

Company name	Company location (city, country)	Activities	Relationship

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA’s public guidance](#).



14. Please provide details of the commodity code(s) you export the goods concerned to the UK under in the box below.

### A4. UK imports of the goods concerned

Complete this section if you indicated under **A1** that **you are an importer of the goods concerned from the People’s Republic of China.**

**RESPONSE:** This section is not applicable to CNCIA.

15. Please provide the total of your import volumes and import values of the goods concerned originating in the People’s Republic of China to the UK during the POI in the table below.

Total import volume in the POI (metric tonnes)	
Total import value in the POI (£ GBP)	

Consider providing these figures in ranges in your non-confidential version of this form.

16. Please provide details for your suppliers of the goods concerned originating in the People’s Republic of China in the table below.

Company name	Company location (city, country)	Activities (producer, trader, etc.)	Relationship

Add additional rows as required

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA’s public guidance](#).

17. Please specify your purpose in importing the goods concerned from the People’s Republic of China. Select all of the following options that are applicable to your business or organisation.

- We resell the goods unchanged to distributors or final customers.
- We process the goods before reselling them to distributors or final customers.



- We use the goods as input in our production of \_\_\_\_\_.  
(specify the product/s).
- We reexport the good to third countries, namely\_\_\_\_\_
- Other.

18. "If you selected "other", please specify your purpose for importing the goods concerned the People's Republic of China in the field below.

19. Please describe how the goods concerned compare to UK produced goods that are like the goods concerned in the field below.

## A5. Production and sales of goods produced in the UK that are like the goods concerned

**Complete this section if you indicated under A1 that you are a producer in the United Kingdom of goods that are like the goods concerned.**

**RESPONSE: This section is not applicable to CNCIA.**

20. Please describe the goods that you produce in the UK and that you consider to be like the goods concerned.

21. Please provide your business' total production volumes and production capacity for UK production of goods that are like the goods concerned during the POI in the table below.



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Total production volume in the POI (metric tonnes)	
Total production capacity in the POI (metric tonnes)	

Consider providing these figures in ranges in your non-confidential version of this form.

22. Please provide the total of your domestic and export sales volumes and sales values of the goods that are like the goods concerned produced by your business in the UK during the POI in the table below.

Total domestic sales volume in the POI (metric tonnes)	
Total domestic sales value in the POI (£ GBP)	
Total export sales volume in the POI (metric tonnes)	
Total export sales value in the POI (£ GBP)	

Consider providing these figures in ranges in your non-confidential version of this form.

23. Please state the production process(es) you use (chloride and/or sulphate). Were there significant fluctuations in major input costs (such as raw materials or energy) across the POI, which had a material impact on the overall cost to make of the goods? If yes, please provide details of these fluctuations.

24. Do you produce and/or sell other goods for the UK market other than the goods that are like the goods concerned in the UK



## Section B: Additional information

### B1. Other interested parties

25. We need contact information in order to notify potentially interested parties. Please provide contact details of any other known exporters, importers of the goods concerned and UK producers of the goods that are like the goods concerned in the UK in the table below

Name	Website	email
LB GROUP CO., LTD.	www.lomonbillions.com	zongcaiban@lomonbillions.com

Add additional rows as required

26. Please provide a list of as many of the following domestic companies as possible:

- Those that produce goods that are like the goods concerned in the UK;
- Those that are involved in the importation, distribution, or sale of goods that are like the goods concerned from third countries;
- Those that are producer or sell raw materials used in the production goods that are like the goods concerned in the UK
- Those that purchase the rutile titanium dioxide, including those that sell use rutile titanium dioxide in their products or services; and those that sell rutile titanium dioxide directly to consumers
- Please specify which category they belong to.

### B2. Scope

27. If you consider that the goods description in scope of the investigation should be varied, please specify the suggested changes and provide your reasons in the field below.

#### RESPONSE:

**CNCIA respectfully requests the exclusion of ink-grade TiO<sub>2</sub> from the scope of the present investigation for the following reasons.**

- 1. First, to the best of CNCIA's knowledge, the UK industry does not produce ink-grade TiO<sub>2</sub>. Thus, this product reaches UK users exclusively through imports.**



2. Second, the imported ink-grade  $\text{TiO}_2$  and the other "standard" types of  $\text{TiO}_2$  produced by the UK industry are not "like" within the meaning of Article 2.6 of the WTO Anti-Dumping Agreement ("ADA").<sup>2</sup>
- To begin with, the production process for ink-grade  $\text{TiO}_2$  differs from the production processes used for standard  $\text{TiO}_2$  grades. High-quality ink-grade  $\text{TiO}_2$  can only be produced using the sulphate process.<sup>3</sup> The UK industry, however, does not use the sulphate process.<sup>4</sup> Moreover, manufacturing ink-grade  $\text{TiO}_2$  requires specialized technical know-how that the UK industry does not possess.
  - Ink-grade  $\text{TiO}_2$  produced using the sulphate method (such as TR52 produced by the LB Group) is characterized by a highly [CONFIDENTIAL – sensitive details as to the specific physical characteristics of the ink-grade  $\text{TiO}_2$  produced by the LB Group]. Standard  $\text{TiO}_2$  produced using the chloride method does not exhibit these combined characteristics. Moreover, ink-grade  $\text{TiO}_2$  is typically applied in very thin layers of approximately [0-15]  $\mu\text{m}$ , whereas the application of other  $\text{TiO}_2$  generally involve layers of around 25  $\mu\text{m}$ .
  - These unique properties make ink-grade  $\text{TiO}_2$  such as TR52, particularly suited for use in the inks industry, whereas standard  $\text{TiO}_2$  is typically used in coatings applications. Therefore, similarly to how the applicant requested the exclusion of anatase  $\text{TiO}_2$ ,<sup>5</sup> ink-grade  $\text{TiO}_2$  should also be excluded from the scope of the present investigation on the grounds that it constitutes a specialty application.<sup>6</sup>
3. Third, even if ink-grade  $\text{TiO}_2$  and other standard types of  $\text{TiO}_2$  were considered to be "like products" within the meaning of Article 2.6 of the ADA, they are not interchangeable or substitutable. Ink-grade  $\text{TiO}_2$  is not suitable for coatings applications, as those applications require thicker films and different performance characteristics. Conversely, using standard  $\text{TiO}_2$  in ink formulations would result in inferior performance and reduced print quality. In other words, ink-grade  $\text{TiO}_2$  serves a specific end-use that cannot be fulfilled by other  $\text{TiO}_2$  types. Therefore, since the UK industry does not produce ink-

<sup>2</sup> Article 2.6 of the ADA provides that: "*Throughout this Agreement the term "like product" ("produit similaire") shall be interpreted to mean a product which is identical, i.e. alike in all respects to the product under consideration, or in the absence of such a product, another product which, although not alike in all respects, has characteristics closely resembling those of the product under consideration.*" [Underlining added].

<sup>3</sup> The applicant incorrectly claims that the difference in production process (sulphate v/s chloride process) does not impact the product so manufactured. See, Application, page 10.

<sup>4</sup> Application, page 12.

<sup>5</sup> Application, page 7.

<sup>5</sup> Application, page 12.

<sup>6</sup> In this connection, CNCIA notes that similar considerations led the TRA to exclude Sustainable Aviation Fuels from the scope of its Biodiesel investigations, recognizing the relevance of end-use distinctions in defining the scope of an investigation. See, in this regard: Case TS0044 – Biodiesel from Argentina, Final Determination of 22 April 2025, Section E3.1; and Case AD0058 – Biodiesel from China, Note to public file – Revising scope of 23 August 2024.



grade TiO<sub>2</sub>, imports of such products cannot cause injury to the UK industry within the meaning of Article 3.5 of the ADA.

4. Fourth, the exclusion of ink-grade TiO<sub>2</sub> from the scope of the present investigation would not undermine the protection afforded to the UK industry, as the applicant does not compete in this specialty segment.<sup>7</sup> Conversely, including these products within the scope of the investigation and any resulting measures would impose unnecessary costs on the UK ink sector.

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<sup>7</sup> CNCIA notes that, in Cases AD0047 and AS0046, the TRA excluded XXXL Excavators from the scope of the proposed duties on the grounds that such products were not produced by the UK industry. See, Cases AD0047 and AS0046 – Certain Excavators from China, Final Negative Determinations.



### B3. Product control numbers

The TRA uses product control numbers (PCNs) to define and distinguish the different types or subcategories of goods that fall under the goods description of the goods concerned. Subcategories are developed on the basis of differences in the physical and/or commercial characteristics of the goods which may impact the price at which each subcategory is sold.

PCNs, which come in the form of an alphanumeric code, help to create a categorisation system so that comparisons can be made between goods produced in the UK and those produced in the country subject to an investigation (the People’s Republic of China).

We have created the following draft PCN table:

Field description:	Product properties:	PCN value:
Production method:	Produced using sulphate method	S
	Produced using chloride method	C
Rutile titanium dioxide content by weight, calculated on the dry matter:	≥80 to <98%	800
	≥98 to <99.5%	980
	≥99.5%	995

*For example, rutile titanium dioxide produced using the sulphate method with a titanium dioxide content by weight, calculated on the dry matter, of over 99.5%, would be: S995*

28. Please review the above draft PCN structure for this investigation and comment in the field below whether the PCN structure is adequate and appropriate to categorise the goods produced, exported and/or imported by your business.

**RESPONSE: CNCIA does not have any comments on the PCN structure for now.**

29. Please provide details of any technical or physical characteristic not included in the PCN structure that may affect the price comparison between the goods concerned and the goods that are like the goods concerned in the UK

**RESPONSE: CNCIA does not have any comments on the PCN structure for now.**



30. If you are an overseas exporter or importer of the goods concerned or a UK producer of the goods that are like the goods concerned in the UK, comment on whether the proposed PCN structure adequately aligns with your goods range. In particular, we would welcome your comments on

- the categorisation of product features;
- the list of products included in the “other” category and whether this prevents a fair comparison between PCNs; and
- whether you produce, or are aware of, any specialised products that fall within the definition of the goods concerned or are like the goods concerned in the UK which have a sufficiently different price point to make them unsuitable for comparison with the other sub-categories of the “goods concerned”.
- Do you export, produce or import any goods that could be categorised under more than one PCN? If so, please suggest any changes to the proposed PCN structure?

**RESPONSE: CNCIA does not have any comments on the PCN structure for now.**

31. Please provide details of any manufacturing process differences which you think may influence the PCN structure and the price comparison between the goods concerned or are like the goods concerned in the UK.

**RESPONSE: CNCIA does not have any comments on the PCN structure for now.**

### B4. Economic Interest Test

32. If, following an investigation, we conclude that a measure should be imposed or extended, we conduct an Economic Interest Test (EIT) to determine whether the proposed measure is in the wider economic interest of the UK. In order to obtain a complete picture of the UK market, could you please help by providing us with details of UK upstream companies (providing inputs for the manufacture of the goods that are like the goods concerned) and UK customers (downstream companies buying the goods). Please confirm in the final column if we are able to contact these companies.

Company name	Company location (city, country)	Contact details (email/tel.)	Relationship	Contact permission (Y/N)



[Add additional rows as required]

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

## B5. Representative third country

The applicant has alleged that there is a Particular Market Situation (PMS) in the market for the goods concerned in the People's Republic of China. The TRA will therefore assess whether such a PMS exists as part of its investigation. If the TRA determines that a PMS exists and the effect of the PMS on the domestic sales price is that it is not possible to make a proper comparison between that domestic sales price and the export price, it may not use the domestic sales price for the purpose of determining normal value.

In such circumstances, the TRA may determine normal value using the costs of production plus a reasonable amount for administrative, selling, and general costs and for profits. The TRA may also make adjustments to those costs and profits using data from an appropriate, representative third country if it determines that any relevant costs or profits are unrepresentative because they do not reasonably reflect the overseas exporter's costs in a market if those costs or profits were substantially determined by market forces.

Please note that any final decision regarding an appropriate, representative third country will be subject to further consultation.

33. In the event that the TRA needs to make such adjustments, the applicant has proposed Brazil as an appropriate representative country. Another option for an appropriate representative country that has been identified is India. Please provide any comments that you have on the suggested representative countries.

### RESPONSE:

**CNCIA does not oppose to the use of India as a representative third country.**

**As concerns the proposed selection of Brazil, CNCIA requests that the TRA also consider Mexico and Malaysia as potential representative third countries. Both countries are producers of TiO<sub>2</sub>, and as shown below, exhibit levels of economic development comparable to that of China.**

**In particular, Mexico appears to be a more appropriate comparator than Brazil based on the relevant metrics.**

**First, publicly available information suggests that Mexico has a substantially greater production capacity than Brazil. For instance, Chemours facility in Mexico plant has a nameplate capacity of approximately 200,000 MT,<sup>8</sup> which is considerably larger than that of the main TiO<sub>2</sub> producer in Brazil (approximately 60,000 MT).<sup>9</sup> Given that China is itself a major producer of TiO<sub>2</sub>, Mexico therefore represents a more comparable third country than Brazil.**

<sup>8</sup> <https://www.chemours.com/en/news-media-center/all-news/press-releases/2016/chemours-begins-commercial-operations-of-new-altamira-tio2-line-in-mexico>.

<sup>9</sup> Application, page 41.



Second, as reflected in the table below, Mexico and Malaysia display closer similarities to China across several economic indicators that the TRA has relied upon in previous investigations.<sup>10</sup> In addition, Mexico and Malaysia provide better comparators than Brazil for indicators that are particularly relevant to production costs, including GDP per capita, the share of employment in industry, and manufacturing value added.

Indicator	GDP per capita <sup>11</sup>	Level of employment in industry as a % of total employed <sup>12</sup>	Manufacturing value added <sup>13</sup>	Life expectancy <sup>14</sup>	Literacy rate <sup>15</sup>
China	13,303.1	32	25	78	97
Mexico	14,185.8	25	20	75	96
Malaysia	11,874.43	26	23	77	96
Brazil	10,310.5	20	12	76	95

34. In the event that you do not agree with either of the above mentioned potential appropriate representative countries, and the TRA needs to make such adjustments, please suggest an alternative third country from which suitable cost and profit data can be obtained. Please explain your reasons for suggesting this country.

**RESPONSE:** As per the response above, CNCIA respectfully requests the TRA to consider Mexico and Malaysia as alternative third countries.

<sup>10</sup> See, for example, Case AD0058 – Biodiesel from China, Note to public file – proposed appropriate representative third country, page 2.

<sup>11</sup> <https://data.worldbank.org/indicator/NY.GDP.PCAP.CD?locations=CN-MX-MY-BR>.

<sup>12</sup> <https://data.worldbank.org/indicator/SL.IND.EMPL.ZS>.

<sup>13</sup> <https://data.worldbank.org/indicator/NV.IND.MANF.ZS?locations=CN-MX-MY-BR>.

<sup>14</sup> <https://data.worldbank.org/indicator/SP.DYN.LE00.IN?locations=CN-MX-MY-BR>.

<sup>15</sup> <https://data.worldbank.org/indicator/SE.ADT.LITR.ZS>.



35. If you have suggested an appropriate representative third country please provide details of an appropriate data source or contact details of a producer in that country who may be willing to participate in the investigation (if you have them).

**RESPONSE:** At this stage, CNCIA is not aware of whether producers located in the proposed representative countries would be willing to participate in the investigation. In this regard, CNCIA notes that price information relating to relevant feedstocks can be obtained from international market platforms, as indicated below. In addition, data concerning energy and labour are available from publicly accessible sources, including government databases and the website of the International Labour Organization (ILO).<sup>16</sup> In CNCIA's view, even if producers in third countries ultimately do not participate in the investigation, the TRA would still have sufficient publicly available information to establish appropriate benchmarks. Accordingly, the participation of producers in a given country should not be treated as a decisive factor when selecting a representative third country.

## B6. Other comments

36. Please use the field below to provide additional information that you consider relevant to this investigation.

If you would like to provide comment on whether you consider there to be a particular market situation<sup>17</sup> in the People's Republic of China, please do so, including reasons and relevant information.

**RESPONSE:** CNCIA submits that TiO<sub>2</sub> prices in China are not artificially low and are not influenced by non-commercial factors. Accordingly, no PMS exists in the Chinese TiO<sub>2</sub> market. Furthermore, even assuming, *arguendo*, that a PMS were found to exist, such a situation would not prevent a proper comparison between domestic sales prices goods and export prices.

CNCIA also disputes the allegation that a PMS exists in the Chinese market for feedstocks. In this regard, CNCIA notes that Chinese producers import a significant share of their feedstocks, and that the prices paid for these raw materials correspond to prevailing international market prices. Consequently, feedstock prices in China cannot be considered artificially low or influenced by non-commercial factors, and therefore no PMS in the feedstock market within the meaning of Regulation 7(4).

In this context, CNCIA further notes that, as the European Commission stated in its final findings that: "*either no reliable statistics or no statistics allowing for differentiation based on TiO<sub>2</sub> concentration in the ores are available*" with respect to

<sup>16</sup> <https://ilostat.ilo.org/>.

<sup>17</sup> [Trade Remedies Authority \(TRA\) dumping, subsidisation and safeguarding investigations guidance - Particular market situation and costs adjustments - Guidance - GOV.UK](#)



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third countries.<sup>18</sup> This observation is particularly relevant because TiO<sub>2</sub> producers use ores with varying TiO<sub>2</sub> concentrations, and these variations have a significant impact on pricing.

CNCIA therefore requests that the TRA consider price data published by TZMI,<sup>19</sup> *i.e.*, a widely recognised international platform for ore market information, when establishing benchmarks for feedstocks. In CNCIA's view, reliance on such data would enable the TRA to determine a representative normal value.

Finally, CNCIA notes that [CONFIDENTIAL – information concerning costs of production that is confidential by nature and whose disclosure (even in summarised form) would have an adverse impact on the organization providing the information and/or would provide an unfair advantage to competitors. Hence, confidentiality is hereby requested].

Consider redacting this information in your non-confidential version of this form, in accordance with [TRA's public guidance](#).

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<sup>18</sup> Commission Implementing Regulation (EU) 2024/1923 of 10 July 2024 imposing a provisional anti-dumping duty on imports of titanium dioxide originating in the People's Republic of China, recital (206).

<sup>19</sup> <https://www.tzmi.com/>.