



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):	MegaChem (UK) Ltd
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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).

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.

XX 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:	AD0086@traderemedies.gov.uk



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).

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).



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](#)¹ 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
- 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.

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



Trade Remedies
Authority

OFFICIAL

Registration form and
Pre-sampling questionnaire

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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.



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- 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.

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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.**

- 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.

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- 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

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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.**

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

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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.**

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)	500-1000mt
Total import value in the POI (£ GBP)	£1,500,000 - £2,000,000

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
Inter-China Chemical Co	Zhenjiang, Jiangsu, P R China	Trader	supplier
Ningbo Xinfu Titanium Dioxide Co Ltd	Ningbo, Zhejiang, P R China	Producer	supplier

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.

TiO2 purchased is made by Sulphate process unlike the UK material which is Chloride process

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.**

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
Brenntag UK Ltd	www.Brenntag.com	
Univar Solutions Ltd	www.univarsolutions.co.uk	
Caldic Chemicals Ltd	www.caldic.com	
Norkem Chemicals Ltd	www.norkem.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.

Tronox Pigments UK Ltd - Producer
Venator – Producer
Brenntag UK – distributor/importer
Univar Solutions – distributor/importer
Caldic Chemicals – distributor/importer
Devine Chemicals – distributor/importer
Kilo Ltd – distributor/importer
Rakem Group – distributor/importer



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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.



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.

ADEQUATE

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



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?

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.

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)



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[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.

AGREED

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.

AGREED



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).

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 situation² in the People's Republic of China, please do so, including reasons and relevant information.

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

² [Trade Remedies Authority \(TRA\) dumping, subsidisation and safeguarding investigations guidance - Particular market situation and costs adjustments - Guidance - GOV.UK](#)