17 April 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 – Comments on pre-sampling questionnaires
Our client: Tronox Pigment UK Limited ("Applicant")

We refer to your services' Note to the file of 2 April 2026 inviting comments on the product scope of the captioned investigation ("**Investigation**"). With this submission, the Applicant provides its comments on the product scope of the Investigation as well as on Lubei Group's ("**Lubei**") comments on the provisional sample of Chinese exporting producers.

In sum, the Applicant considers that:

- The Trade Remedies Authority ("**TRA**") should reject requests to exclude rutile titanium dioxide ("**Rutile TiO2**") that is recommended for use in inks ("**Ink Grade Rutile TiO2**") from the scope of the Investigation or to grant an end-use exemption for Ink Grade Rutile TiO2 from any anti-dumping duties (<u>Section 1</u>).
- The TRA should use Brazil as the representative country for the purpose of the normal value calculation (<u>Section 2</u>).
- Evidence confirms that there is a particular market situation ("**PMS**") for feedstocks for Lomon Billions Group ("**LB**") (<u>Section 3</u>).
- The TRA should reject Lubei's request to be excluded from the sample (<u>Section 4</u>).

1. The TRA should reject requests to exclude or exempt "ink-grade" Rutile TiO2

1. In their pre-sampling questionnaires, LB, the China National Coatings Industry Association ("**CNCIA**"), and an anonymous UK inks producer ("**UK Ink Producer**") (together: the "**Parties**") make comments about the purported differences in product

characteristics between Ink Grade Rutile TiO2 and other Rutile TiO2, essentially arguing that Ink Grade Rutile TiO2 is not "like" other Rutile TiO2.[1]

2. In its comments of 31 March 2026 ("**Scope Comments**"), LB makes additional claims regarding Ink Grade Rutile TiO2, and requests either the exclusion of Ink Grade Rutile TiO2 from the scope of the Investigation or an end-use exemption from any anti-dumping duties on Rutile TiO2 for imports of Rutile TiO2 used to produce inks.[2]

3. As explained below, the TRA should reject the Parties' requests to exclude Ink Grade Rutile TiO2 from the scope of the Investigation (<u>Section 1.1</u>). The TRA should also reject LB's request for an end-use exemption for Ink Grade Rutile TiO2 (<u>Section 1.2</u>).

1.1 The TRA should reject the request to exclude Ink Grade Rutile TiO2 from the scope of the Investigation

4. The TRA should reject the Parties' request to exclude Ink Grade Rutile TiO2 from the scope of the Investigation for (at least) two reasons. First, the Parties do not, because they cannot, define Ink Grade Rutile TiO2, so that Ink Grade Rutile TiO2 cannot be excluded from the scope of the Investigation (<u>Section 1.1(a)</u>). In any event, Ink Grade Rutile TiO2 is like other Rutile TiO2, so that the TRA should not exclude Ink Grade Rutile TiO2 from the scope of the Investigation (<u>Section 1.1(b)</u>).

(a) Ink Grade Rutile TiO2 cannot be defined, so that it cannot be excluded from the scope of the Investigation

5. While LB's Scope Comments contain much verbiage on the purported differences between Ink Grade Rutile TiO2 (purportedly a "term of art in the industry")[3] and other Rutile TiO2, LB and the other Parties fail to precisely define Ink Grade Rutile TiO2.

6. Specifically, LB fails to provide clear technical parameters for distinguishing Ink Grade Rutile TiO2 from other Rutile TiO2. The closest that LB gets to a technical definition of Ink Grade Rutile TiO2 is Rutile TiO2 with "optimised crystal size and surface treatment," which in turn results in certain undefined performance: "low" abrasiveness, "high" gloss, "high" dispersion, "high" loading capacity, and "high" opacity.[4] Crucially, the term "optimised" does not detail how the actual crystal size and surface treatment of Ink Grade Rutile TiO2 is different from that of other Rutile TiO2.

7. LB is aware of the issue with its approach so claims that the technical specifications of Ink Grade Rutile TiO2 can be "delineated (within the larger product group) by measurable technical properties."[5] However, LB does not clarify which properties, let

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[1] *See* LB Sichuan Titanium Industry Co. Ltd., Pre-sampling questionnaire, pp. 13-14; LB Group Co. Ltd., Pre-sampling questionnaire, pp. 13-14; Billions Europe Ltd., Pre-sampling questionnaire, pp. 11, 14; CNCIA, Pre-sampling questionnaire, pp. 12-14.

[2] LB, Scope Comments, p. 10.

[3] LB, Scope Comments, p. 3.

[4] LB, Scope Comments, p. 3.

[5] LB, Scope Comments, p. 3.

alone which value cutoffs for those properties would distinguish Ink Grade Rutile TiO2 from other Rutile TiO2.

8. This confirms a key point: there is no accepted definition of Ink Grade Rutile TiO2. There is no way to distinguish Ink Grade TiO2 from other Rutile TiO2 other than by the application in which it is used. This is particularly clear from LB's proposed amendment to the scope of the Investigation, which is to exclude "rutile titanium dioxide produced via the sulphate process and optimised for use in the printing inks industry."[6]

9. LB's exclusion request for Ink Grade Rutile TiO2 is meant to undermine the effectiveness of any anti-dumping duties the TRA may impose. That is because the Rutile TiO2 that LB refers to as "ink grade" is, in the real world, recommended for an assortment of uses, not just inks. Indeed, nearly all commercially available Rutile TiO2 grades that are recommended for use in inks are also recommended for other uses.

10. First, contrary to what the CNCIA claims,[7] in the marketing materials and technical data sheets used to promote these grades, all but one grade that LB refers to as an "ink grade" is also recommended for applications other than in inks:[8]

- Kronos 2066 is also recommended for use in (a) packaging and can coatings; and (b) industrial coatings and wood finishes for interior use.[9]
- Kronos 2064 is also recommended for use in (a) packaging and can coatings; (b) industrial coatings and wood finishes for interior use; and (c) interior powder coatings.[10]
- Venator Tioxide RDFO is also recommended for use in high quality coatings.[11] (Contrary to what the UK Inks Producer claims,[12] Venator's Scarlino site, where Tioxide RDFO was produced, has now reopened under the new ownership of Nuova Solmine.[13])
- LB Billions TR52 is also recommended for use in can coatings.[14]

11. Second, the same is true for other Ink Grade Rutile TiO2 of which LB makes no mention. Contrary to what LB claims,[15] there are multiple producers of Rutile TiO2 other than Kronos, Venator, and LB who manufacture TiO2 for use in inks. These grades are, again, also recommended for applications other than in inks. For instance, the Tronox Group produces three types of Ink Grade Rutile TiO2:

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6 LB, Scope Comments, p. 11.

7 CNCIA, Pre-sampling questionnaire, p. 13.

8 LB, Scope Comments, pp. 9-10.

9 Kronos, Kronos 2066 technical datasheet, **Annex 1**.

10 Kronos, Kronos 2064 technical datasheet, **Annex 2**.

11 Venator, Tioxide RDFO technical datasheet, **Annex 3**.

12 Company Ltd., Pre-sampling questionnaire, pp. 10 and 16.

13 *See*, e.g., Polimercia News, Italy's TiO2 plant changes hands and reopens, 9 January 2026, **Annex 4**.

14 LB, Billions TR52 technical datasheet, **Annex 5**.

15 LB, Scope Comments, p. 9.

- TiONA 813 is also recommended for use in (a) high PVC flat interior emulsion and solvent coatings; and (b) architectural coatings.[16]
- TiONA 8140 is also recommended for use in (a) high PVC flat interior emulsion and solvent coatings; and (b) architectural coatings.[17]
- TiONA 828 is also recommended for use in (a) interior and exterior coatings; (b) solvent and water-based coatings; (c) architectural coatings; (d) general industrial coatings; (e) powder coatings; and (f) marine and protective coatings.[18]

12. The Tronox Group's Ink Grade Rutile TiO2 is produced using the chloride process, which contradicts claims that only TiO2 produced through the sulphate process can be used in inks.[19] Similarly, Rutile TiO2 producer Chemours also produces an Ink Grade Rutile TiO2, Ti-Pure TS-4657, using the chloride process.[20] Ti-Pure TS-4657, too, is recommended for applications other than in inks: it can be used "for a wide range of printing technologies and product applications."[21]

13. Rutile TiO2 producer Cinkarna also produces four types of Ink Grade Rutile TiO2, all of which are again also recommended for applications other than in inks:

- RC 813 is also recommended for use in (a) high gloss dispersions; (b) industrial and decorative coatings; (c) radiator paints; (d) coil coatings; (e) domestic appliance finishes; (f) package lacquers; (g) carton-paper coatings; (h) masterbatches; and (i) white concrete.[22]
- RC 813 (TMP free) is also recommended for use in (a) high gloss dispersions; (b) industrial and decorative coatings; (c) radiator paints; (d) coil coatings; (e) domestic appliance finishes; (f) package lacquers; (g) carton-paper coatings; (h) masterbatches; and (i) white concrete.[23]
- RC 833 is also recommended for use in (a) dispersion paints (exterior, interior); (b) industrial and decorative coatings (water and solvent base); (c) high gloss dispersions; (d) radiator paints; (e) coil coatings; (f) domestic appliance finishes; (g) powder coatings (exterior, interior); (h) plaster paints; and (i) plaster paints based on synthetic resins.[24]
- RC 833 TMP free is also recommended for use in (a) dispersion paints (exterior, interior); (b) industrial and decorative coatings (water and solvent base); (c) high gloss dispersions; (d) radiator paints; (e) coil coatings; (f) domestic appliance

16 Tronox, TiONA 813 technical datasheet, **Annex 6**.

17 Tronox, TiONA 8140 technical datasheet, **Annex 7**.

18 Tronox, TiONA 828 technical datasheet, **Annex 8**.

19 LB, Scope Comments, pp. 9-10; Company Ltd., Pre-sampling questionnaire, p. 10.

20 Chemours, Ti-Pure TS-4657 technical datasheet, **Annex 9**.

21 Chemours, Ti-Pure TS-4657 technical datasheet, **Annex 9**.

22 Cinkarna, RC 813 technical datasheet, **Annex 10**.

23 Cinkarna, RC 813 TMP free technical datasheet, **Annex 11**.

24 Cinkarna, RC 833 technical datasheet, **Annex 12**.

finishes; (g) powder coatings (exterior, interior); (h) plaster paints; and (i) plaster paints based on synthetic resins.[25]

14. Similarly, Chinese producer CHTI's R-215 Ink Grade Rutile TiO2 is also recommended for (a) water-based paint; (b) solvent-based paint; (c) powder coating; and (d) papermaking.[26] CHTI's R-2196+ is also recommended for (a) solvent-based paint; (b) gloss and matt exterior and interior architectural latex paint; and (c) industrial paint.[27] CHTI's XR-290 is also recommended for paint.[28]

15. Further, in addition to Kronos 2066 and 2064 to which LB refers, Kronos markets two additional grades for use in inks. Once more, these grades are also recommended for applications other than in inks:

- Kronos 2044 is also recommended for use in (a) matte architectural paints; (b) paper coatings; and (c) wallpaper coatings.[29]
- Kronos 2047 is also recommended for (a) coatings for paper and board; (b) light weight coated paper; (c) matt emulsion paints; and (d) synthesis resin plasters.[30]

16. Similarly, LB produces additional grades to those listed in the Scope Comments, of which LB makes no mention,[31] that it recommends for use in inks:

- Billions LR-982 is also recommended for (a) water-based coatings; and (b) toner for PVC wallpaper.[32]
- Billions LR-972 is recommended for (a) industrial coatings; (b) exterior and interior architectural coatings; and (c) PVC pipes and window profiles.[33] However, in LB's products and applications overview, LB also recommends Billions LR-972 for use in inks.[34]
- Billions BLR-699 is also recommended for (a) interior architectural coatings; (b) exterior architectural coatings; and (c) industrial coatings.[35]
- Billions BLR-698 is also recommended for (a) exterior architectural coatings; (b) interior architectural coatings; and (c) industrial coatings.[36]

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25 Cinkarna, RC 833 TMP free technical datasheet, **Annex 13**.

26 CTHI, R-215 technical datasheet, **Annex 14**.

27 CTHI, R-2196+ technical datasheet, **Annex 15**.

28 CTHI, XR-290 technical datasheet, **Annex 16**.

29 Kronos, Kronos 2044 technical datasheet, **Annex 17**.

30 Kronos, Kronos 2047 technical datasheet, **Annex 18**.

31 However, LB Sichuan Titanium Industry, the entity that produces this grade, explicitly refers to it as "ink-grade TiO2." *See* LB Sichuan Titanium Industry Co. Ltd., Pre-sampling questionnaire, p. 14.

32 LB, Billions LR-982 technical datasheet, **Annex 19**.

33 LB, Billions LR-972 technical datasheet, **Annex 20**.

34 LB, Products and applications, **Annex 21**.

35 LB, Billions BLR-699 technical datasheet, **Annex 22**.

36 LB, Billions BLR-698 technical datasheet, **Annex 23**.

17. Third, in some applications, inks producers use other grades of Rutile TiO2 than those recommended for inks. For instance, [*Sensitive information redacted – Tronox's business operations*] sources TiONA 595, which the Applicant produces in the UK, and which is not specifically recommended for producing inks, to produce certain inks. Due to LB's steep price undercutting – of a whopping [*500-700*] USD/MT – the Applicant lost some volume to [*Sensitive information redacted – Tronox's business operations*], who replaced TiONA 595 with Billions BLR-895, which also does not list inks as recommended applications.[37] TiONA 595 and Billions BLR-895 are made using the chloride process and are multi-purpose grades recommended for a wide range of applications.[38]

18. Similarly, the Tronox Group's subsidiary in Brazil ("**Tronox Brazil**") has been selling TiONA 592, which is not specifically recommended for producing inks,[39] to [*Sensitive information redacted – Tronox Brazil's business operations*] two large ink producers. While [*Sensitive information redacted – Tronox Brazil's business operations*] switched to Chinese suppliers after the Covid-19 pandemic because of injuriously low prices, [*Sensitive information redacted – Tronox Brazil's business operations*] has approached Tronox Brazil to purchase TiONA 592 following the imposition of Brazilian anti-dumping duties on Chinese TiO2.

19. The examples of [*Sensitive information redacted – Tronox Group's business operations*] illustrate once more that UK producers, including ink producers, do not buy Chinese Rutile TiO2 for its specifications or quality. They buy it for its injuriously low price. That is true for all Rutile TiO2, including Rutile TiO2 specifically recommended for use in inks. For example, although not on the UK market, [*Sensitive information redacted – Tronox's business operations*], an ink producer, for many years used TiONA 128, a legacy version of TiONA 828 that is recommended for use in inks.[40] However, [*Sensitive information redacted – Tronox's business operations*] switched completely from TiONA 128 to Chinese Rutile TiO2 – exclusively due to price. Upon request, Tronox can provide additional examples from numerous markets where customers of Ink Grade Rutile TiO2 have switched from chloride grades produced by Tronox to Chinese grades simply due to price undercutting.

20. These examples of customers switching among products and often using products recommended for multiple applications demonstrates that there is no way to distinguish Ink Grade Rutile TiO2 from other Rutile TiO2. Absent a clear, precise, and enforceable definition of Ink Grade Rutile TiO2, Ink Grade Rutile TiO2 cannot be excluded from the

37 Tronox, [*Sensitive information redacted – Tronox's business operations*] call report, 25 June 2025, **Annex 24**.

38 Tronox, TiONA 595 technical datasheet, **Annex 25**; LB, Billions BLR-895 technical datasheet, **Annex 26**.

39 Tronox, TiONA 592 technical datasheet, **Annex 27**.

40 *See* above, para. 12.

scope of the Investigation.[41] In other words, the Parties fail to meet their initial burden of proof, because they fail to properly define Ink Grade Rutile TiO2 in a way that permits differentiating Ink Grade Rutile TiO2 from other Rutile TiO2.

21. In any event, and crucially, even if Ink Grade Rutile TiO2 could be precisely defined (*quod non*), a product exclusion for Ink Grade Rutile TiO2 would severely undermine the effectiveness of any anti-dumping duties.[42] That is because Ink Grade Rutile TiO2 can be and is used for a wide range of other, large-volume applications in the coatings industry,[43] where Ink Grade Rutile TiO2 directly competes with other Rutile TiO2. If Ink Grade Rutile TiO2 would be excluded from the scope of the Investigation, UK Rutile TiO2 users will, for many applications, simply switch to buying dumped Ink Grade Rutile TiO2 for producing paints, coatings, and other products.

22. For these reasons, the TRA should reject the Parties' requests to exclude Ink Grade Rutile TiO2 from the scope of the Investigation.

(b) Ink Grade Rutile TiO2 is like other Rutile TiO2 so that it should not be excluded from the scope of the Investigation

23. In any event, the Parties' request to exclude Ink Grade Rutile TiO2 fails because, contrary to what the Parties claim, Ink Grade Rutile TiO2 is like other Rutile TiO2.

24. As an initial point, the Applicant recalls that Regulation 7 of Schedule 4 to the Taxation (Cross-border Trade) Act 2018 ("**Act**") defines "like goods" as (a) goods which are like those goods in all respects; or (b) if there are no such goods, goods which, although not alike in all respects, have characteristics <u>closely resembling</u> those of the goods in question.

25. Further, as context, the Applicant recalls that in the 2024-2025 EU anti-dumping investigation on imports of TiO2 from China, the European Commission ("**Commission**") addressed the question whether Ink Grade TiO2 (for which the Commission used the shorthand term "graphic TiO2") was like other TiO2. After reviewing the input and claims from interested parties, the Commission found that:

> *"… graphic TiO2 shares the same basic physical, chemical and technical characteristics with other TiO2 types, as it is a standard rutile product with coating containing chemicals found in many other TiO2 types."*[44]
>
> *"Even though graphic ink TiO2 is not fully substitutable with other types of TiO2, it still shares the same basic physical, chemical, and technical*

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41 To give but one real-world example, it would be impossible for UK customs to enforce a product exclusion for Ink Grade Rutile TiO2 if there is no physical difference between Ink Grade Rutile TiO2 and other Rutile TiO2.

42 Contrary to what the CNCIA claims. *See* CNCIA, Pre-sampling questionnaire, p. 14.

43 *See* above, paras. 8-12.

44 Recital 57 to 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, OJ L 11.7.2024.

> *characteristics with them. The Commission thus concluded there is no reason for product exclusion."*[45]
>
> *"The Commission thus maintained its position that graphic TiO2 does not have different basic physical, chemical, and technical characteristics compared to other types of TiO2 to [warrant being] excluded from the product scope" of the investigation."*[46]

26. In sum, the Commission rejected a product exclusion request for Ink Grade TiO2 on the grounds that Ink Grade TiO2 was like other TiO2.

27. In the Investigation, the Parties argue that Ink Grade Rutile TiO2 is not like other Rutile TiO2 because (a) Ink Grade Rutile TiO2 is produced using the sulphate process, whereas the Applicant uses the chloride process;[47] (b) the application thickness of Ink Grade Rutile TiO2 is thinner than that of other Rutile TiO2;[48] (c) ink producers use only Ink Grade Rutile TiO2;[49] and (d) there is no UK production of Ink Grade Rutile TiO2.[50]

28. The Parties then refer to the TRA's findings regarding sustainable aviation fuel ("**SAF**") in *Biodiesel from China* and claim that the TRA should exclude Ink Grade Rutile TiO2 from the scope of the Investigation by analogy.[51]

29. The Parties' claim fails.

30. To recall, in *Biodiesel from China*, the TRA excluded SAF because (a) the production process for SAF is different from that for in-scope biodiesel; (b) the raw materials used for SAF are different from those for in-scope biodiesel; (c) SAF cannot be used in place of in-scope biodiesel; (d) SAF is more expensive than in-scope biodiesel; (e) SAF is taxed more favorably than in-scope biodiesel; and (f) different customers buy SAF and in-scope biodiesel.[52] In short, the TRA considered that SAF was not like in-scope biodiesel.

31. Based on the criteria on which the TRA based its decision to exclude SAF from the scope of the investigation in *Biodiesel from China*, Ink Grade Rutile TiO2 should not be excluded from the scope of the Investigation as it is like other Rutile TiO2.

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45 Regulation 2024/1923, recital 59.

46 Recital 159 to Commission Implementing Regulation (EU) 2025/4 of 17 December 2024 imposing a definitive anti-dumping duty and definitively collecting the provisional duty imposed on imports of titanium dioxide originating in the People's Republic of China, OJ L 9.1.2025.

47 CNCIA, Pre-sampling questionnaire, p. 13; LB Group Co. Ltd., Pre-sampling questionnaire, pp. 13-14.

48 LB Group Co. Ltd., Pre-sampling questionnaire, pp. 13-14.

49 LB Group Co. Ltd., Pre-sampling questionnaire, pp. 13-14.

50 LB Group Co. Ltd., Pre-sampling questionnaire, pp. 13-14.

51 LB, Scope Comments, pp. 6 and 8. *See also* LB Sichuan Titanium Industry Co. Ltd., pre-sampling questionnaire, p.14; LB Group Co. Ltd., Pre-sampling questionnaire, p. 14.

52 TRA, *Biodiesel from China*, AD0058, Note to the file: Proposal to revise the scope of the investigation, 14 August 2024.

- Production process: The Parties claim that Ink Grade Rutile TiO2 is only made using the sulphate process, whereas the Applicant only produces Rutile TiO2 using the chloride process.

  As an initial point, that is factually wrong: the Tronox Group and Chemours' Ink Grade Rutile TiO2 is made using the chloride process.[53]

  In addition, the relevant comparison is between the production process for Ink Grade Rutile TiO2 and the production process for other Rutile TiO2. The sulphate process does not distinguish Ink Grade Rutile TiO2 from other Rutile TiO2, as many Rutile TiO2 grades other than Ink Grade Rutile TiO2 are produced using the sulphate process.

  LB then claims that Ink Grade Rutile TiO2 requires "specific milling and micronising set-ups," requiring "sustained R&D investment" and "significant expenditure on specialized manufacturing equipment and dedicated production lines."[54] LB does not explain how the purported "specific" milling and micronizing setups are materially different from other milling and micronizing setups, including the Applicant's milling and micronizing setups.[55] In addition, LB provides no figures for its claims, and the relevance and materiality of its claims about the exceptionality of Ink Grade Rutile TiO2 are called into question by the fact that Kronos, Venator, Chemours, Cinkarna, the Tronox Group, LB, and CHTI all produce Ink Grade Rutile TiO2.

  In this context, LB claims that low abrasiveness is an "essential property" of Ink Grade Rutile TiO2, and that low abrasiveness can be achieved only through the sulphate process "together with precise micronizing and milling techniques."[56] The claim is factually wrong. The Tronox Group and Chemours have the technical expertise to allow them to control and adjust abrasiveness levels in the chloride process, as confirmed by the fact that the Tronox Group's and Chemours's Ink Grade Rutile TiO2 is made using the chloride process.[57] For instance, Chemours's Ti-Pure TS-4657 is expressly described as a "low-abrasion grade" produced via the chloride process.[58]

  Finally, LB's references to the application thickness of Ink Grade Rutile TiO2 are not relevant to the likeness of Ink Grade Rutile TiO2 with other Rutile TiO2,[59] as application thickness concerns how the product is applied – it is not a physical characteristic, but an element of its end use.

- Raw materials: The Parties do not dispute that the raw materials used to produce Ink Grade Rutile TiO2 are the same as those for producing other Rutile TiO2.

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53 *See* above, paras. 11-12.

54 LB, Scope Comments, p. 7. *See also* CNCIA, Pre-sampling questionnaire, p. 13.

55 *See*, e.g., Applicant, Familiarization visit presentation, slide 27.

56 LB, Scope Comments, pp. 3-4.

57 *See* above, paras. 11-12.

58 Chemours, Ti-Pure TS-4657 technical datasheet, **Annex 9**.

59 LB Sichuan Titanium Industry Co. Ltd., Pre-sampling questionnaire, p. 14; LB Group Co. Ltd., Pre-sampling questionnaire, p. 14; Billions Europe Ltd., Pre-sampling questionnaire, p. 14.

- Price difference: The Parties do not dispute that there is no material price difference between Ink Grade Rutile TiO2 and other Rutile TiO2.[60]
- Substitutability: While LB makes much of the fact that ink producers have little choice but to use Rutile TiO2 grades with certain performance characteristics. The reality is that all Ink Grade Rutile TiO2 can be and is used for a wide range of other applications, including large-volume applications. Ink Grade Rutile TiO2 is substitutable for mass coatings grades.
- Taxation: The Parties do not dispute that there is no difference in taxation between Ink Grade Rutile TiO2 and other Rutile TiO2.
- Customers: While Ink Grade Rutile TiO2 is used by ink producers, it is also used by producers of a wide range of products, including coatings and paints – which are the largest customers of other Rutile TiO2.[61] Ink Grade Rutile TiO2 is thus used by many of the same customers as other Rutile TiO2.

32. As to physical, chemical, and technical characteristics, LB offhandedly concedes that there is no difference between Ink Grade Rutile TiO2 and other Rutile TiO2 other than end use when it claims that the Applicant recognizes that "end-use differentiation can justify product exclusion" because the Applicant excluded anatase TiO2 from the scope of its application.[62] LB's analogy is, however, flawed. There is a clear, precise technical difference between anatase TiO2 and Rutile TiO2, as anatase TiO2 has anatase crystals polymorphs, whereas Rutile TiO2 has rutile crystals polymorphs. This is a key distinction, as – in the words of the Commission – the market "generally differentiates TiO2 as anatase or rutile."[63]

33. Finally, LB claims that the Applicant does not produce Ink Grade Rutile TiO2 in the UK. As noted, TiONA 595, which the Applicant produces in the UK, is being used for certain ink applications.[64] In any event, even if the Applicant would not produce Ink Grade Rutile TiO2 in the UK,[65] that would be no reason to exclude Ink Grade Rutile TiO2 from the scope of the Investigation.

34. First, excluding Ink Grade Rutile TiO2, which is not and cannot be defined, would create a large loophole given the substitutability of Ink Grade Rutile TiO2 into applications such as coatings and paints.[66] As a result, LB's simplistic argument that including Ink Grade

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60 LB merely states that the price of Ink Grade Rutile TiO2 "cannot be (directly) compared" with other Rutile TiO2, but LB (a) links this point to sulphate versus chloride production, which is already covered by the PCNs; and (b) does not propose any amendments to the PCNs for Ink Grade Rutile TiO2 because there are no physical differences between Ink Grade Rutile TiO2 and other Rutile TiO2. *See* LB Sichuan Titanium Industry Co. Ltd., Pre-sampling questionnaire, p. 17; LB Group Co. Ltd., Pre-sampling questionnaire, p. 16; Billions Europe Ltd., Pre-sampling questionnaire, p. 17.

61 *See* above, paras. 8-12.

62 LB, Scope Comments, p. 6. *See also* CNCIA, Pre-sampling questionnaire, p. 13.

63 Regulation 2025/4, recital 68.

64 *See* above, para. 17.

65 *See*, e.g., LB, Scope Comments, p. 1.

66 *See* above, Section 1.1(a).

Rutile TiO2 goes against the UK interest fails. To the contrary: excluding Ink Grade Rutile TiO2 would severely undermine the effectiveness of the anti-dumping duties.

35. The risk of creating a loophole in the effectiveness of anti-dumping duties was absent in *Excavators from China*, to which LB refers.[67] In *Excavators from China*, the TRA excluded excavators with an operating weight of >80 MT from the scope of the investigation – precisely defined machines for which the UK market was limited to a handful of machines and for which there was no substitutability into the lower-weight, larger-volume segments of the UK excavator market.[68] In contrast, LB is asking to exclude the undefinable Ink Grade Rutile TiO2 from the scope of the investigation, while all Ink Grade Rutile TiO2 has many applications other than in inks.[69]

36. Second, anti-dumping duties would not prevent UK ink producers from buying Chinese Ink Grade Rutile TiO2. Duties merely seek to offset Chinese producers' unfair trading practices. In any event, UK ink producers can also (continue to) source Ink Grade Rutile TiO2 from other suppliers, such as Kronos, Venator's new owner Nuova Solmine, Cinkarna, Chemours, or the Tronox Group (including the Applicant).[70] These suppliers have sufficient capacity to supply the UK market and ensure that there remains strong competition on the UK market – contrary to what LB claims.[71]

37. For completeness, the Applicant notes that LB's implied claim that the UK inks industry affects "93,000 - 98,000" jobs is evidently wrong.[72] The research to which LB indirectly cites is from the British Printing Industries Federation ("**BCIF**") and concerns the UK printing industry,[73] which is downstream from the UK inks industry. The jobs are jobs in printing, e.g., advertising literature, books, magazines and newspapers.[74] BCIF's research does not refer even once to the ink industry; it is inapposite to the Investigation.

38. For these reasons, too, the TRA should reject the Parties' requests to exclude Ink Grade Rutile TiO2 from the scope of the Investigation.

1.2 The TRA should reject LB's request for an end-use exemption for Ink Grade Rutile TiO2 from the anti-dumping duties

39. In the Scope Comments, as an alternative to a product exclusion, LB requests an end-use exemption for Ink Grade Rutile TiO2,[75] in parallel to the end-use exemption granted by the Commission in the EU anti-dumping investigation on TiO2 from China. LB claims

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67 LB Sichuan Titanium Industry Co. Ltd., Pre-sampling questionnaire, p. 15; LB Group Co. Ltd., Pre-sampling questionnaire, p. 15; Billions Europe Ltd., Pre-sampling questionnaire, p. 15.

68 TRA, *Certain Excavators from China*, AD0047, Final negative determination.

69 *See* above, Section 1.1(a).

70 *See* above, paras. 8-12.

71 LB, Scope Comments, p. 10.

72 LB Sichuan Titanium Industry Co. Ltd., Pre-sampling questionnaire, p. 15.

73 British Printing Industries Federation, Facts and figures, **Annex 28**.

74 British Printing Industries Federation, Facts and figures, **Annex 28**, p. 8.

75 LB, Scope Comments, p. 1.

that the TRA could provide for an end-use exemption in accordance with the authorized use procedure under UK customs law.[76]

40. LB's request fails for (at least) three reasons.

41. First, LB does not produce inks in the United Kingdom. It is not for LB to request an end-use exemption on behalf of UK ink producers. The TRA should reject LB's request for that reason alone.

42. Second, contrary to what is the case under EU law,[77] under UK law, Rutile TiO2 could be imported under the authorized use procedure only for six specific end uses:[78]

- For incorporation in certain ships, boats or other vessels.
- For the purposes of their construction, repair, maintenance or conversion.
- For fitting to or equipping such ships, boats or other vessels.
- For incorporation, for the purposes of their construction, repair, maintenance or conversion, in certain drilling or production platforms.
- For equipping such platforms.
- For linking these drilling or production platforms to the mainland.

43. None of these uses are relevant to ink production. In other words, the authorized use procedure is not relevant to LB's claim, which is thus inoperative.

44. Third, in any event, an end-use exemption could hypothetically be granted only if exceptional factual and economic conditions are met. That is not the case in the Investigation.

45. Specifically, under the EU law on which LB bases its claim, an end-use exemption requires the following – cumulatively – from a user:

- Complete a detailed user questionnaire, which has to be verified by the Commission.[79] In the data provided in the user questionnaire, the user must demonstrate the impact of anti-dumping duties on their business, including that the user would become lossmaking as a result of the anti-dumping duties on its

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76 LB, Scope Comments, pp. 10-11.

77 Article 254 of the Union Customs Code does not link the end-use procedure to any specific end use. *See* Regulation (EU) No 952/2013 of the European Parliament and of the Council of 9 October 2013 laying down the Union Customs Code, OJ L 269, 10.10.2013, p. 1.

78 HMRC, Authorised use: Eligible goods and authorised uses – List of commodity codes of goods eligible for an authorised use procedure, version 2.23 read together with Regulation 20 of The Customs (Reliefs from a Liability to Import Duty and Miscellaneous Amendments) (EU Exit) Regulations 2020 and with HMRC's manual Special procedure: authorised use (end use).

79 *See*, e.g., recitals 167 and 169 to Commission Implementing Regulation (EU) 2025/1901 of 22 September 2025 imposing a definitive anti-dumping duty and definitively collecting the provisional duty imposed on imports of glyoxylic acid originating in the People's Republic of China, OJ L, 2025/1901, 23.9.2025. This is the most recent case in which the Commission granted an end-use exemption. *See also*, e.g., Regulation 2025/4, recitals 37-40.

sourcing pattern (i.e., the user's cost would go up more than what it can absorb and/or pass on).[80]

- Demonstrate that the user cannot switch suppliers to non-Chinese producers, for technical and/or capacity reasons.[81]
- Demonstrate that the end-use exemption would not undermine the effectiveness of the anti-dumping duties.[82]
- Provide technical characteristics that permit identifying the specific product for which an end-use exemption was requested.[83]

46. Further, to operationalize an end-use exemption, under EU law, a user must obtain a license from customs authorities, which imposes reporting obligations on the user to demonstrate in detail that goods imported under the end-use exemption are in effect used exclusively for the intended end-use.[84] Violations of the end-use exemption are criminal offences. This ensures that an end-use exemption is not abused.

47. In the Investigation, no UK ink producer has made any material submission to the TRA, let alone provided evidence to corroborate that an end-use exemption – even if it would be available and enforceable under UK law – could be warranted. There is thus not even a *prima facie* case for an end-use exemption before the TRA.

48. For those reasons, the TRA should reject LB's request for an end-use exemption for Ink Grade Rutile TiO2 from any anti-dumping duties that the TRA may impose.

2. The TRA should use Brazil as the representative country

49. In their pre-sampling questionnaires, the UK Ink Producer, the CNCIA, LB, and several other Chinese exporting producers[85] comment on the Applicant's proposal to use Brazil and the TRA's proposal to use India as the representative country for the construction of the normal value of Rutile TiO2.[86]

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80 *See*, e.g., Regulation 2025/1901, recitals 151, 165, and 167; Regulation 2025/4, recital 350.

81 *See*, e.g., Regulation 2025/1901, recitals 158 and 348; Regulation 2025/4, recital 443.

82 *See*, e.g., Regulation 2025/1901, recital 158.

83 *See*, e.g., Regulation 2025/1901, recital 159; Regulation 2025/4, recital 41.

84 *See*, e.g., Regulation 2025/4, recital 436.

85 Inter-China Chemical Co., Ltd, Kunming Donghao Technology Development Co., Ltd, Panzhihua Dongfang Titanium Industry Co., Ltd, Shandong Doguide Group Co., Ltd, and Shandong Jinhai Titanium Resources Technology Co., Ltd.

86 Company Ltd., Pre-sampling questionnaire, p. 15; CNCIA, Pre-sampling questionnaire, pp. 17-19; Billions Europe, Pre-sampling questionnaire, pp. 20-22; LB Group Co., Ltd, Pre-sampling questionnaire, pp. 17-19; LB Lufeng Titanium Industry Co., Ltd, Pre-sampling questionnaire, pp. 16-18; LB Sichuan Titanium Industry Co., Ltd, Pre-sampling questionnaire, pp. 18-22; LB Xiangyang Titanium Industry Co., Ltd, Pre-sampling questionnaire, pp. 16-18; Henan Billions Advanced Material Co., Ltd, Pre-sampling questionnaire, pp. 16-18; Inter-China Chemical Co., Ltd, Pre-sampling questionnaire, p. 15; Kunming Donghao Technology Development Co., Ltd, Pre-sampling questionnaire, p. 15; Panzhihua Dongfang Titanium Industry Co., Ltd, Pre-sampling questionnaire, p. 15; Shandong Doguide Group Co., Ltd, Pre-sampling questionnaire, p. 15; Shandong Jinhai Titanium Resources Technology Co., Ltd, Pre-sampling questionnaire, p. 15.

50. LB did not object to the use of India,[87] but objected to the use of Brazil. LB and CNCIA suggest Mexico and Malaysia as alternative representative countries.[88]

51. Panzhihua Dongfang Titanium Industry suggests South Korea as a representative country, without substantiating its claim.[89] Similarly, Shandong Jinhai Titanium Resources Technology suggests Morocco as a representative country, without substantiating its claim.[90]

52. Pursuant to Regulations 13(5) and 14(4) of the Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 ("**D&S Regulations**"), the TRA should determine whether a country is an appropriate representative third country by considering: (a) whether reliable information is made available by overseas exporters in that country at the time of selection; (b) whether that country or territory has a level of economic development comparable to the exporting country or territory; and (c) any other factors the TRA considers relevant.

53. As set out in the Application,[91] Brazil would be an appropriate representative country in this Investigation because (a) reliable information is available from Tronox Brazil, which produces Rutile TiO2 and is cooperating in the Investigation;[92] and (b) Brazil is at a similar level of development to China. The appropriateness of Brazil is confirmed by the fact that the TRA previously used Brazil as a representative country,[93] and that the Commission used Brazil in the EU anti-dumping investigation on TiO2.[94]

54. The UK Ink Producer claims that Brazil is not appropriate because there is no chloride Rutile TiO2 production, whereas the Applicant uses the chloride process.[95] The UK Ink Producer misunderstands the purpose of selecting a representative third country, which aims to assist the TRA in constructing an undistorted normal value of Rutile TiO2 in China, not in the UK.

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[87] Inter-China Chemical, Kunming Donghao Technology Development, and Shandong Doguide Group agree with the use of India as a representative country and do not suggest an alternative representative country.

[88] CNCIA, Pre-sampling questionnaire, pp. 17-19; Billions Europe, Pre-sampling questionnaire, pp. 20-22; LB Group Co., Ltd, Pre-sampling questionnaire, pp. 17-19; LB Lufeng Titanium Industry Co., Ltd, Pre-sampling questionnaire, pp. 16-18; LB Sichuan Titanium Industry Co., Ltd, Pre-sampling questionnaire, pp. 18-22; LB Xiangyang Titanium Industry Co., Ltd, Pre-sampling questionnaire, pp. 16-18; Henan Billions Advanced Material Co., Ltd, Pre-sampling questionnaire, pp. 16-18.

[89] Panzhihua Dongfang Titanium Industry Co., Ltd, Pre-sampling questionnaire, p. 15.

[90] Shandong Jinhai Titanium Resources Technology Co., Ltd, Pre-sampling questionnaire, p. 15.

[91] *See* Application, Section E.2.5.

[92] As the TRA has discretion in deciding which data to take from an exporter's records and which data to adjust, if the TRA decides to adjust administrative, selling and general costs and profit using information from an exporter in a representative country, the TRA could use data from Tronox Brazil. *See* Department for Business and Trade, Trade Remedies Authority (TRA) dumping, subsidisation and safeguarding investigations guidance, "Adjustments when constructing a normal value," available here.

[93] *See* TRA, *Certain Excavators from China*, AD0047, Final Determination, paras. 332-333 and 335.

[94] Regulation 2024/1923, recitals 77-79.

[95] Company Ltd., Pre-sampling questionnaire, p. 15.

55. None of the proposed alternative representative countries are as appropriate as Brazil.

56. First, the TRA identified India as an alternative representative country.[96] As explained,[97] India is not an appropriate representative country because it does not have a comparable level of economic development to China, as required by Regulations 13(5) and 14(4) of the D&S Regulations:[98]

- China is an upper middle-income country, whereas India is a lower middle-income country.
- China's GDP per capita is more than four times higher than India's.
- China's life expectancy is six years higher than India's.
- China's literacy rate significantly exceeds India's.

57. Second, LB and CNCIA claim that Mexico and Malaysia are appropriate representative countries. These claims fail.

58. Mexico and Malaysia are not appropriate representative countries because they do not satisfy Regulations 13(5) and 14(4) of the D&S Regulations, as there is no reliable information made available by overseas exporters of Rutile TiO2 in Mexico or Malaysia. As the TRA emphasized in the Investigation,[99] as well as in previous investigations,[100] the appropriateness of a representative country must be assessed in light of the availability and reliability of data from overseas exporters in the proposed representative country at the time of selection by the TRA.[101]

59. In any event, as to Mexico, the only Mexican Rutile TiO2 producer is Chemours.[102] Chemours' Mexican Rutile TiO2 production facility is not comparable to Chinese Rutile TiO2 plants. That is because Chemours' [*Sensitive information redacted – Copyright-protected information from market intelligence provider*] of Rutile TiO2 production are not comparable to those of other Rutile TiO2 producers, as Chemours [*Sensitive information redacted – Copyright-protected information from market intelligence provider*].[103] Chemours' ilmenite use in feedstock blends is [*Sensitive information redacted – Copyright-protected information from market intelligence provider*] among chloride-process Rutile TiO2 producers,[104] and is attributable to [*Sensitive information redacted –*

96 TRA, *Rutile titanium dioxide from China*, AD0086, Note to the public file on proposed representative third country, 31 March 2026, p. 1.

97 Applicant, Pre-sampling questionnaire, answer to question 33.

98 Applicant, Pre-sampling questionnaire, Table 1.

99 TRA, *Rutile titanium dioxide from China*, AD0086, Note to the public file on proposed representative third country, 31 March 2026, p. 1.

100 TRA, *Biodiesel from China*, AD0058, Final Determination, paras. 72-73.

101 TRA, *Biodiesel from China*, AD0058, Final Determination, paras. 72-73.

102 Billions Europe, Pre-sampling questionnaire, p. 20.

103 [*Sensitive information redacted – Market intelligence provider*], **Annex 29**.

104 [*Sensitive information redacted – Market intelligence provider*], **Annex 29**.

Copyright-protected information from market intelligence provider].[105] For that reason, Mexico is not an appropriate representative country.

60. As to Malaysia, the only Malaysian Rutile TiO2 producer is Venator. Venator's Malaysian Rutile TiO2 production facility was shut down in September 2025 as a result of Venator's bankruptcy – which was caused by Chinese dumping.[106] For that reason, Malaysia is not an appropriate representative country.

61. Third, Panzhihua Dongfang Titanium Industry claims that South Korea is an appropriate representative country. That claim fails.

62. South Korea does not satisfy Regulations 13(5) and 14(4) of the D&S Regulations because it is not at a comparable level of economic development to China:[107]

- China is an upper middle-income country, whereas South Korea is a high-income country.
- South Korea's GDP per capita is almost three times higher than China's.
- South Korea's life expectancy is five years higher than China's.

63. In any event, there is no reliable information made available by overseas exporters of Rutile TiO2 in South Korea.

64. Fourth, Shandong Jinhai Titanium Resources Technology claims that Morocco is an appropriate representative country. That claim fails.

65. Morocco does not satisfy Regulations 13(5) and 14(4) of the D&S Regulations because it is not at a comparable level of economic development to China:[108]

- China is an upper middle-income country, whereas Morocco is a lower middle-income country.
- China's GDP per capita is more than three times higher than Morocco's.
- China's life expectancy is three years higher than Morocco's.
- China's literacy rate significantly exceeds Morocco's.

66. In any event, there is no reliable information made available by overseas exporters of Rutile TiO2 in Morocco.

67. For those reasons, the TRA should use Brazil as the representative country.

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105 [*Sensitive information redacted – Market intelligence provider*], **Annex 29**.

106 Rongqing Chemical, Venator suspends production in the UK by 2025, 18 September 2025, **Annex 30**.

107 World Bank Group, Economic and social indicators compared, China and South Korea, **Annex 31**.

108 World Bank Group, Economic and social indicators compared, China and Morocco, **Annex 32**.

3. Evidence confirms that there is a PMS for feedstocks for LB

68. In their pre-sampling questionnaires,[109] LB, CNCIA, and the Ministry of Commerce of the PRC claim that there is no PMS affecting the Rutile TiO2 sector in the PRC in general, and no PMS affecting the price of feedstock in particular, because LB imports a significant part of its feedstocks at prices aligned with international market prices.

69. These claims fail. In its Application,[110] the Applicant provided evidence showing that there are both horizontal distortions and distortions affecting specifically the Chinese Rutile TiO2 sector in the PRC. Regarding feedstocks in particular, even if LB imports some feedstocks, it is a prime example of a vertically integrated Rutile TiO2 producer that produces ilmenite in the PRC and, in addition, sources ilmenite from the PRC so as to benefit from structural distortions in the PRC market for ilmenite.

70. Specifically, as set out in the Application,[111] LB owns Lomon Mining and Metallurgy that operates an ilmenite mine in Panzhihua, in the Sichuan Province. LB is also actively involved in titanium-bearing ore mining projects in the same region in cooperation with state-owned entities ("**SOEs**") and provincial governments.[112] Through these operations, LB secures access to Chinese ilmenite that is used as feedstock for its Rutile TiO2 production at distorted prices.

71. LB itself highlighted the strategic importance of its domestic ilmenite production and supply. In 2018, when announcing its intended acquisition of Sichuan Anning Iron and Titanium,[113] LB stated that the acquisition was intended to enable it to produce sufficient ilmenite, in combination with its existing ilmenite operations in Panzhihua, to satisfy essentially all its sulphate pigment feedstock requirements. Although the acquisition was ultimately not completed,[114] this public statement demonstrates LB's reliance and strategic focus on securing Chinese ilmenite. LB also confirmed in the context of the EU anti-dumping investigation on TiO2 that it sources at least part of its ilmenite domestically.[115]

72. To recall,[116] LB directly benefits from government subsidies linked to titanium-bearing ore mining, processing, and utilisation. Publicly available evidence shows that LB

109 Ministry of Commerce of the PRC, Pre-sampling questionnaire, pp. 14-15; CNCIA, Pre-sampling questionnaire, pp. 19-20; Billions Europe, Pre-sampling questionnaire, pp. 22-23; LB Group Co., Ltd, Pre-sampling questionnaire, pp. 17-19; LB Lufeng Titanium Industry Co., Ltd, Pre-sampling questionnaire, pp. 19-20; LB Sichuan Titanium Industry Co., Ltd, Pre-sampling questionnaire, pp. 22-23; LB Xiangyang Titanium Industry Co., Ltd, Pre-sampling questionnaire, pp.19-20; Henan Billions Advanced Material Co., Ltd, Pre-sampling questionnaire, pp. 19-20.

110 *See* Application, Annex E.2.1.

111 *See* Application, Annex E.2.1, paras. 51-68.

112 *See* Application, Annex E.2.1, para. 66.

113 LB, Lomon Billions Announces Intention to Purchase Ilmenite and Iron Concentrate Producer Sichuan Anning Iron and Titanium Co., Ltd, 21 March 2018, **Annex 33**.

114 LB, Lomon Billions Terminates its Investigation into the Purchase of Ilmenite and Iron Concentrate Producer Sichuan Anning Iron and Titanium Co., Ltd, 18 May 2018, **Annex 34**.

115 Regulation 2025/4, recital 164.

116 *See* Application, Annex E.2.1, para. 64.

received multiple government grants, including subsidies for the use of mineral resources, infrastructure projects serving mining areas, and technology development related to titanium slag smelting. As mentioned above,[117] LB also entered into long-term strategic cooperation agreements with provincial governments and SOEs to develop vanadium-titanium magnetite resources, involving substantial investment commitments and expanded mining capacity.

73. Taken together, these factors show that Rutile TiO2 production and LB's sourcing of ilmenite in the PRC take place under conditions determined by government intervention and support, affecting costs, supply, and market conditions.

4. The TRA should reject Lubei's request to be excluded from the sample

74. In its comments on the TRA's provisional selection of a sample of exporting producers, Lubei requests the TRA to be excluded from the sample.[118] In its Notification of sample, the TRA confirmed that Lubei remains sampled, but the TRA does not yet address Lubei's claim.[119]

75. Lubei bases its claim on the purported practice of the TRA, which allegedly sampled only one exporting producer in *Biodiesel from China*.[120]

76. This is factually wrong. In *Biodiesel from China*, the TRA sampled two Chinese exporting producers, as it did in the Investigation. During the investigation, one exporting producer "confirmed that they no longer wished to cooperate in the investigation."[121] As a result, the TRA treated this company as non-cooperative.[122]

77. The TRA has sampled Lubei based on its export volume to the United Kingdom in the period of investigation. There is no reason to exclude Lubei from the scope of the sample.

78. Should Lubei not participate as a sampled exporting producer, the TRA should also treat Lubei as non-cooperating and assign it the anti-dumping duty rate for non-cooperating exporting producers.

5. Conclusion

79. In sum, the Applicant requests that the TRA:

- Reject the Parties' requests to exclude Ink Grade Rutile TiO2 from the scope of the Investigation.

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117 *See* Application, Annex E.2.1, para. 66.

118 Lubei Group, Comments on the sampling result in the Trade Remedies case *Rutile titanium dioxide from China* (AD0086).

119 TRA, *Rutile titanium dioxide from China*, AD0086, Notification of sample, 8 April 2026.

120 Lubei Group, Comments on the sampling result in the Trade Remedies case AD0086, point 4.

121 TRA, *Biodiesel from China*, AD0058, Statement of essential facts, para. 39.

122 TRA, *Biodiesel from China*, AD0058, Statement of essential facts, paras. 41, 54, and Table 36.

- Reject LB's request for an end-use exemption for Ink Grade Rutile TiO2 from the anti-dumping duties.

- Use Brazil as the representative country for constructing the normal value of Chinese Rutile TiO2.

- Find that there is a PMS for titanium feedstocks for LB.

- Reject Lubei's request to be excluded from the sample.

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