

19 May 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 – Note to the public file regarding proposed representative third countries

Our client: Tronox Pigment UK Limited ("Applicant")

1. We refer to your services' Note to the file of 8 May 2026 regarding proposed representative third countries ("**Note**") in the captioned investigation ("**Investigation**"). The Applicant hereby provides its comments on the Note.
2. Following its request for submissions regarding the representativeness of, and the availability of data from, potential representative third countries of 8 April 2026, the Trade Remedies Authority ("**TRA**") received registration forms from Tronox Pigmentos do Brasil SA ("**Tronox Brazil**") and The Chemours Company México, S. de R.L. de C.V. ("**Chemours Mexico**"). Subsequently, the TRA provisionally selected Brazil and Mexico as representative countries due to the similarity of economic development between Brazil, Mexico, and the PRC, as well as the availability of data from Brazil and Mexico regarding the production of Rutile TiO₂.
3. The Applicant submits that the TRA should use Brazil as the representative country for the purpose of calculating normal value, as Brazil is more representative than Mexico. The reasons are set out below.
4. First, as explained in the Applicant's Application and Comments on the pre-sampling questionnaires of 17 April 2026 ("**Comments**"),¹ Brazil would be an appropriate representative country in the Investigation because it is at a similar level of development to the PRC and because reliable information concerning the production of Rutile TiO₂ is available from Tronox Brazil. The Applicant reiterates that Tronox Brazil produces Rutile TiO₂ and stands ready to fully cooperate in the Investigation.² As explained in its

¹ See AD0086, Application, Section E.2.5; AD0086, Applicant, Comments, para. 53.

² 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

Comments, the Applicant further recalls that the Brazil's appropriateness is confirmed by the TRA's prior use of Brazil as a representative country³ and by the European Commission's use of Brazil in the EU anti-dumping investigation concerning TiO₂.⁴

5. Second, the Applicant reiterates that data available for Mexico is less representative than data available for Brazil. As explained in the Comments, Chemours Mexico is the only Mexican Rutile TiO₂ producer and its Mexican production facility is not comparable to Chinese Rutile TiO₂ plants.⁵
6. Specifically, Chemours Mexico's production costs are not representative because it has [*Sensitive information redacted – Copyright-protected information from market intelligence provider*], which gives Chemours Mexico [*Sensitive information redacted – Copyright-protected information from market intelligence provider*].⁶ Additionally, Chemours' use of ilmenite in its feedstock blends is [*Sensitive information redacted – Copyright-protected information from market intelligence provider*].⁷ This [*Sensitive information redacted – Copyright-protected information from market intelligence provider*] process results from Chemours Mexico's [*Sensitive information redacted – Copyright-protected information from market intelligence provider*].⁸ Data from Chemours Mexico is consequently not representative and, therefore, the TRA should not use Mexico as the representative country in the Investigation.
7. For those reasons, the TRA should use Brazil as the representative country in the Investigation.

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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](#).

³ See TRA, *Certain Excavators from China*, AD0047, Final Determination, paras. 332-333 and 335.

⁴ Recitals 77-79 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.

⁵ AD0086, Applicant, Comments, para. 59.

⁶ [*Sensitive information redacted – Market intelligence provider*], Annex 29 to the Comments, p. 107.

⁷ [*Sensitive information redacted – Market intelligence provider*], Annex 29 to the Comments, p. 89.

⁸ [*Sensitive information redacted – Market intelligence provider*], Annex 29 to the Comments, p. 89.