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Joris Cornelis ◊●
Partners

VVGB ADVOCATEN | AVOCATS

**CONFIDENTIAL VERSION**

**Your Ref:** **Email:** [redacted – contains personal information] **Date:** 10 April 2026
[redacted – contains personal information]
[redacted – contains personal information]

**Subject: AD0086 – Anti-Dumping Investigation into Rutile Titanium Dioxide originating in the People's Republic of China – Request for exemption by the LB Group**

Dear Madam, Sir,

We refer to your Notification of Sample of 8 April 2026 by which you informed our client – the LB Group – of its inclusion in the sample. In this Notification, you also informed our client that each of the five exporters which are part of the LB Group are expected to complete questionnaire responses.

Our client would like to request the exclusion of two exporters from the requirement to respond to the anti-dumping questionnaire:

- LB Lufeng Titanium Industry Co., Ltd., and
- LB Xiangyang Titanium Industry Co., Ltd..

As is evident from our client's Pre-sampling form, these two companies sold very limited quantities of rutile titanium dioxide ("$TiO_2$") in the UK market. In fact, as shown in the table below, these two companies account for a minuscule proportion of LB Group's exports to the EU, both in terms of export volumes and value:

**[redacted – commercially sensitive information]**

Given the negligible volume and value of Ti02 exported by these two companies to the UK, our client hereby requests an exemption from the obligation to provide responses to the anti-dumping questionnaires in this investigation. Our client considers that it may be somewhat disproportionate to require these companies to file a questionnaire given the negligible impact of these sales in the dumping and injury calculations.

Moreover, as can be seen from the table above and from our client's pre-sampling questionnaire, the sales made by the other three producers (Henan Billions, LB Group and LB Sichuan) are substantial and therefore do not undermine the UKTRA's ability to reasonably establish the dumping and injury margins.

We thank you for your consideration of this request. Our client is cognizant of the deadline for filing its questionnaire reply, and would therefore appreciate it if it could receive a reply to this request as soon as reasonably practicable.

Please do not hesitate to contact us should you have any questions and/or comments.

Yours sincerely,

[redacted – contains personal information]
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