



# 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):	<i>Tronox Pigments UK Limited (“Tronox”), a subsidiary of Tronox Holdings plc (“Tronox Group”)</i>
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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
- 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.

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



## 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.

N/A

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.



*Tronox is a member of the Chemicals Industry Association and an affiliate member of the Titanium Dioxide Industry Consortium (EU), the Titanium Dioxide Industry Consortium (UK) and the Titanium Dioxide Manufacturers' Association.*

## 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.

*On January 26, 2026, Tronox Group announced the closure of its Chinese rutile titanium dioxide ("Rutile TiO<sub>2</sub>") production facility.<sup>2</sup> Jiangxi Tikon Titanium Products Co. Ltd. ("Tikon"), the legal entity under which the Tronox Group's Chinese Rutile TiO<sub>2</sub> production entity fell, [CONFIDENTIAL – Business-sensitive information about legal entity].*

*As detailed in **Section A.4** below, in the POI, Tronox imported a small volume of Rutile TiO<sub>2</sub> manufactured by Tikon into the UK. Other than potentially in respect of the limited inventory still held by Tikon, Tronox's UK imports of Rutile TiO<sub>2</sub> from China will cease in the near term.*

*As such, Tronox's Chinese production facility (and Tikon) is not material to the investigation.*

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)	[15-45,000]
Total production capacity in the POI (metric tonnes)	46,000

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](#).

<sup>2</sup> See <https://www.tronox.com/tronox-announces-closure-of-its-pigment-plant-in-china-and-releases-selected-preliminary-fourth-quarter-2025-financial-results/>.



Company name	Company location (city, country)	Activities	Relationship
<i>Tronox Pigments (Holland) BV</i>	<i>Rotterdam, The Netherlands</i>	<i>[CONFIDENTIAL – Business-sensitive information about the operations of and relationships between Tronox Group entities]</i>	
<i>Tronox France SAS</i>	<i>Thann, France</i>		
<i>Tronox LLC</i>	<i>Hamilton, Mississippi, United States</i>		
<i>Tronox Mineral Sands Proprietary Ltd.</i>	<i>Centurion, South Africa</i>		
<i>Tronox KZN Sands Proprietary Ltd.</i>	<i>Centurion, South Africa</i>		
<i>Tronox Management Pty Ltd.</i>	<i>Cooljarloo, Australia</i>		
<i>Tronox Mining Australia Pty Ltd.</i>	<i>Wonerup, Australia</i>		
<i>Tronox Management Pty Ltd.</i>	<i>Kwinana, Australia</i>		
<i>Tronox Pigment Bunbury Pty Ltd.</i>	<i>Bunbury, Australia</i>		
<i>Jiangxi Tikon Titanium Products Co. Ltd.</i>	<i>Fuzhou, China</i>		

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)	[15-25,000]
Total domestic sales value in the POI (£ GBP)	[25-50,000,000] <sup>3</sup>

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.

*Tikon uses the sulphate method.*

*Regarding fluctuations in major input costs in raw materials, the price of sulphur increased by GBP [20-30] from February to March, by GBP [30-40] from March to April, by GBP [20-30] from April to May, and by GBP [5-15] from May to June. As a result, the overall cost increase to produce Rutile TiO<sub>2</sub> in the POI was GBP [20-30], GBP [40-60], GBP [25-45], and GBP [10-20] per MT for the four periods mentioned, respectively.<sup>4</sup>*

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?

*Yes, Tikon is a [CONFIDENTIAL – Business-sensitive information about the relationship between Tronox Group entities]. See Section A.2.6 above.*

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

N/A

### 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.

<sup>3</sup> We used the average exchange rate for 2025 (0.759 GBP) to convert USD to GBP. Source: <https://www.exchangerates.org.uk/USD-GBP-spot-exchange-rates-history-2025.html>.

<sup>4</sup> Ibid.



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

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)	N/A
Total indirect export volume in the POI (metric tonnes)	[1-3,000]
Total direct export value in the POI (£ GBP)	N/A
Total indirect export value in the POI (£ GBP)	[2-6,000,000]

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
Tronox	Grimsby, UK	UK producer of Rutile TiO2	[CONFIDENTIAL – Business-sensitive information about the relationship between Tronox Group entities]

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.

The commodity code of the product exported by Tikon to Tronox is [CONFIDENTIAL – Business-sensitive information].

## 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)	[1-3,000]
Total import value in the POI (£ GBP)	[1-5,000,000]

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
<i>Jiangxi Tikon Titanium Products Co. Ltd.</i>	<i>Fuzhou, China</i>	<i>[CONFIDENTIAL – Business-sensitive information about the operations of and relationships between Tronox Group entities]</i>	

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.

N/A

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

*The goods are like.*



## 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.

*See Sections A.1.1 and A.2 of the Application. In sum, Tronox manufactures and sells the goods concerned in the UK.*

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.

Total production volume in the POI (metric tonnes)	[80,000-140,000]
Total production capacity in the POI (metric tonnes)	165,000

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)	[15-25,000]
Total domestic sales value in the POI (£ GBP)	[30-50,000,000]
Total export sales volume in the POI (metric tonnes)	[75-125,000]
Total export sales value in the POI (£ GBP)	[150-250,000,000]

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.

*See Sections A.3.4 and A.3.5 of the Application. In sum, Tronox manufactures the goods concerned via the chloride process.*



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

No.



## 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
See <b>Sections C.1 and C.2</b> of the Application.		

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.

See **Sections C.1, C.2.2, and C.3** of the Application. In addition, the following companies are or may be involved in the distribution of Rutile TiO<sub>2</sub> on the UK market:

- Industrial Mineral Services UK Limited
- Thermograde UK Limited
- Kilo Limited
- Flexitrade UK Limited
- Pharmacy Bond Limited
- Uptc Limited
- Maxbiz Company UK
- PDP Enterprises UK
- New Image Trading Co Ltd
- Smart Trading LLP
- TP Polymer Private Limited
- Sun Gold Co Ltd (Hong Kong)
- Venator Asia Sdn Bgd (Malaysia)
- Billions Hong Kong Corporation Limited (UK entity)



## 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.

*Tronox agrees with the description of the goods.*

## 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:
<b>Production method:</b>	Produced using sulphate method	S
	Produced using chloride method	C
<b>Rutile titanium dioxide content by weight, calculated on the dry matter:</b>	≥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.

*The PCNs are adequate and appropriate to categorize the goods produced, exported and/or imported by Tronox. See **Section A.3.6** of the Application.*

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



N/A

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?

N/A

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.

N/A

### 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)
[CONFIDENTIAL – Tronox’s suppliers]				

[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.

*See Section E.2.5 of the Application. Brazil was used as a representative country in other anti-dumping investigations and would be an appropriate representative country for this investigation.*

*India would not be an appropriate representative country for this investigation because it does not meet the requirements of Regulations 14(4) and 13(5) of the D&S Regulations. That is because, based on the development indicators that the TRA uses to determine the appropriateness of a representative country, India does not have a similar level of economic development to China.<sup>5</sup> As Table 1 reports, China’s GDP per capita is more than four times higher than that of India. While China is an upper middle-income country, India is a lower middle-income country. The life expectancy in China is 6 years higher than in India. The literacy rate in China far exceeds that in India.*

**Table 1 – Economic development of China, India, and Brazil**

Development indicator	China	India	Brazil
GDP per capita (2024) <sup>6</sup>	USD 13,303	USD 2,694	USD 10,280

<sup>5</sup> This is also confirmed by the fact that the European Commission does not use India as a representative country for the purpose of constructing normal value in investigations targeting China under the significant distortions methodology.

<sup>6</sup> See Annex E.2.5.1 to the Application.



World Bank classification <sup>7</sup>	Upper middle income	Lower middle income	Upper middle income
Life expectancy (2023) <sup>8</sup>	78 years	72 years	76 years
Literacy rate <sup>9</sup>	96.7% (2020)	81.7% (2023)	94.7% (2024)

*In contrast to India, the economic development in Brazil is much closer to China's economic development – as detailed in **Section E.2.5** of the Application. For those reasons, plus the fact that Tronox Brazil is willing to cooperate as a representative country producer, the TRA should use Brazil.*

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.

N/A

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).

N/A

## 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>10</sup> in the People's Republic of China, please do so, including reasons and relevant information.

See *Annex E.2.1 to the Application*.

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

<sup>7</sup> See *Annex E.2.5.2 to the Application*.

<sup>8</sup> See *Annex E.2.5.3 to the Application*.

<sup>9</sup> See *Annex E.2.5.4 to the Application*.

<sup>10</sup> [Trade Remedies Authority \(TRA\) dumping, subsidisation and safeguarding investigations guidance - Particular market situation and costs adjustments - Guidance - GOV.UK](#)