

01 June 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 the importance of swift and strong action**  
**Our client: Tronox Pigment UK Limited ("Applicant")**

On 3 March 2026, the Trade Remedies Authority ("**TRA**") initiated the captioned investigation ("**Investigation**") on UK imports of rutile titanium dioxide ("**Rutile TiO<sub>2</sub>**") originating from China. According to the TRA's case timelines, the TRA plans to impose any provisional anti-dumping duties ("**ADDs**") in July-August 2026.<sup>1</sup>

As detailed below, in view of recent developments, it is crucial that the TRA:

- Take swift action in the Investigation because Chinese exporters are stockpiling massive volumes of Rutile TiO<sub>2</sub> to evade the provisional ADDs (Section 1).
- Take strong action to avoid the UK becoming a target of anti-dumping, anti-circumvention, and other enforcement action from other jurisdictions (Section 2).

**1. Chinese exporters are stockpiling massive volumes of Rutile TiO<sub>2</sub>**

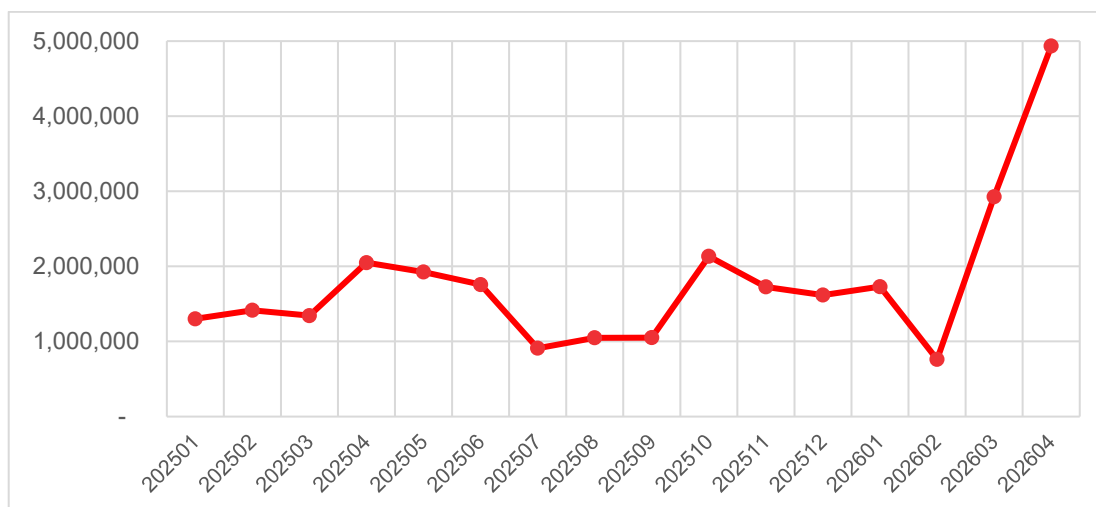
1. As *Figure 1* demonstrates, official Chinese export statistics report a massive volume of exports of Rutile TiO<sub>2</sub> to the UK.
2. In 2025, the average monthly export volume was 1,500 MT. On 3 March 2026, the TRA initiated the Investigation. Chinese exporters took immediate action: in March 2026, exports amounted to almost 3,000 MT – the highest volume in years and double the average volume in 2025. In April 2026, the situation was even worse: exports amounted to almost 5,000 MT – more than triple the average volume of 2025. In other words, in the

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<sup>1</sup> TRA, Notes to the file AD0086: Dumping investigation relating to rutile titanium dioxide originating in The People's Republic of China (PRC) External timeline, 3 March 2026 and 23 March 2026.

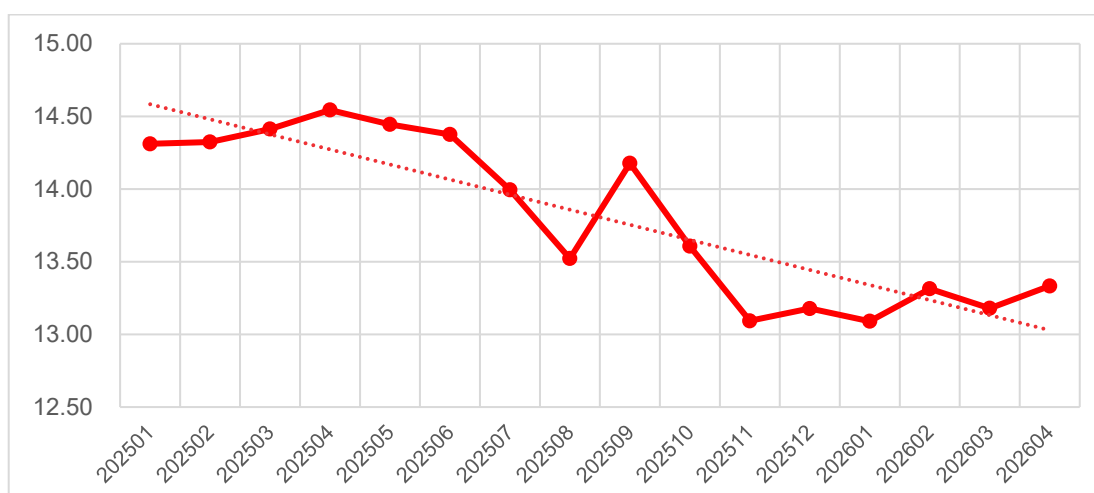
two months since initiation of the Investigation for which data is available, exports amounted to half the export volume of full year 2025.

Figure 1 - Chinese export volume of Rutile TiO<sub>2</sub> to the UK (kg)<sup>2</sup>



3. Chinese exporters are thus accelerating exports – and doing so significantly faster than their prior behavior in anti-dumping investigations in other jurisdictions – to stockpile Rutile TiO<sub>2</sub> on UK territory. There is but one reason for this stockpiling: anticipate and evade the provisional ADDs, which should be decided upon by the TRA and, if accepted by the Secretary of State, enter into force in July-August 2026. The exported volumes already amount to up to six months of sales. If this extreme export behavior is permitted to continue, it will undermine not only provisional ADDs, but also potentially any definitive ADDs depending on the volumes that ultimately land in the UK.
4. At the same time, the prices of exports of Rutile TiO<sub>2</sub> from China continue to be at cut-throat, highly injurious price levels. This shows that Chinese exporters are adamant in their pursuit of their strategy of pricing the Applicant out of the market, which results in decreased capacity utilization and increased fixed costs – ultimately forcing the Applicant out of business (as happened to Venator, previously the only Rutile TiO<sub>2</sub> producer other than the Applicant).

<sup>2</sup> Source: General Administration of Customs of the People's Republic of China, **Annex 1**.

Figure 2 - Chinese export price of Rutile TiO<sub>2</sub> to the UK (RMB/kg)<sup>3</sup>

5. The TRA should address the Chinese exporters' stockpiling by taking two actions.
6. First, the TRA should recommend that the Secretary of State impose provisional ADDs as swiftly as possible to prevent Chinese exporters from in effect evading the provisional ADDs.
7. By stockpiling, Chinese exporters will negate the redressive effect of the provisional ADDs: by burning off their large inventories, Chinese exporters will be able to continue their unfair trading practices on the UK market and increase the injury suffered by the Applicant for the entire period during which provisional ADDs would apply and could extend into the period where definitive ADDs apply, depending on the volumes landed in the UK prior to the effective date of any ADDs.
8. Second, when making its final recommendation,<sup>4</sup> the TRA should recommend that the Secretary of State impose retroactive ADDs for a period of 90 days prior to the imposition of the provisional ADDs,<sup>5</sup> so that the massive volume of Rutile TiO<sub>2</sub> exported from China since initiation of the Investigation is maximally subjected to ADDs.
9. The conditions for imposing retroactive ADDs are met:<sup>6</sup>
  - Imports of Rutile TiO<sub>2</sub> from China are being registered since 26 March 2026.<sup>7</sup>
  - There is a history of dumping of Rutile TiO<sub>2</sub> from China that causes injury and/or UK importers are, or should have been, aware that the Chinese exporters dump and that such dumping would cause injury to the UK industry. As the Applicant

<sup>3</sup> Source: General Administration of Customs of the People's Republic of China, **Annex 1**.

<sup>4</sup> Regulation 91(1A) of the Dumping and Subsidization Regulations.

<sup>5</sup> Paragraph 19 of Schedule 4 of the Taxation (Cross-border Trade) Act 2018.

<sup>6</sup> Regulation 91 of the Dumping and Subsidization Regulations.

<sup>7</sup> On 26 March 2026, the Secretary of State for Business and Trade instructed HM Revenue & Customs to register UK imports of Rutile TiO<sub>2</sub> from China. See Secretary of State, Trade remedies notice 2026/14: registration of imports of rutile titanium dioxide originating from China, 26 March 2026.

explained, TiO<sub>2</sub> from China is subject to ADDs in Brazil, the European Union, India, and Saudi Arabia.<sup>8</sup> The key importers are sophisticated global participants in the highly concentrated, globally integrated Rutile TiO<sub>2</sub> supply chain that are fully aware of the findings in these anti-dumping investigations. In any event, the anti-dumping investigations were widely publicized in the TiO<sub>2</sub> industry.

These importers thus knew that imports of Rutile TiO<sub>2</sub> from China are likely being dumped and causing injury, particularly given the public nature of the investigations, the high duties imposed, and the involvement of the same Chinese producers (e.g., LB Group) supplying the UK market.

At the very least, importers would have been aware, or should have been aware of, the dumping and injury since the initiation of the Investigation and the publication of the Applicant's application.<sup>9</sup>

- The injury suffered by the Applicant is caused by a massive volume of dumped Rutile TiO<sub>2</sub> from China in a short period of time and the remedial effect of the ADDs is undermined by stockpiling.<sup>10</sup>

10. For these reasons, the TRA should recommend the imposition of (a) provisional ADDs as quickly as possible to stem the flood of imports of Rutile TiO<sub>2</sub> from China; and (b) retroactive ADDs to ensure that the Chinese exporters' stockpiling does not undermine the effectiveness of the ADDs.

## **2. The UK risks becoming a target of anti-dumping, anti-circumvention, and other enforcement action by other jurisdictions**

11. On 27 April 2026, LB Group, which is the largest Chinese Rutile TiO<sub>2</sub> producer and a sampled producer in the Investigation, completed the acquisition of Venator's Greatham TiO<sub>2</sub> production facility.<sup>11</sup>
12. As explained, immediately after announcing the then-proposed transaction with LB Group, Venator announced that 273 employees were made redundant, leaving only 232 UK employees. Out of the 273 redundancies, 126 were at the Greatham plant. This indicates that LB Group does not intend to continue significant production at the Greatham plant.<sup>12</sup>
13. The layoffs are, instead, consistent with LB Group using the Greatham plant as a "finishing" plant.<sup>13</sup> Finishing is the last step in the Rutile TiO<sub>2</sub> production process. It only

<sup>8</sup> See Application, Section A.1.4.

<sup>9</sup> See, by analogy, recitals 162-163 to Commission Implementing Regulation (EU) 2025/2153 of 22 October 2025 imposing a definitive anti-dumping duty and definitively collecting the provisional duty imposed on imports of screws without heads originating in the People's Republic of China, and levying the definitive anti-dumping duty on the registered imports of screws without heads originating in the People's Republic of China, OJ L, 2025/2153, 23.10.2025.

<sup>10</sup> See above, paras. 1-5.

<sup>11</sup> See LB Group, LB Group completes the acquisition of Venator manufacturing site, 27 April 2026, available at: <https://www.lomonbillions.global/lb-group-completes-the-acquisition-of-venator-manufacturing-site/>.

<sup>12</sup> See Application, Section C.1.

<sup>13</sup> See Application, Section F.2.1, Sub-section E.

adds a small amount of value and requires a much smaller workforce and investments than running an actual TiO<sub>2</sub> plant. Importantly for LB Group, the production capacity for a finishing plant can be easily increased significantly.

14. In a nutshell, LB Group's strategy thus appears to be:
- Import into the UK base Rutile TiO<sub>2</sub> pigment produced in China;
  - Finish the base Rutile TiO<sub>2</sub> pigment in the UK, bypassing the existing supply chain for TiO<sub>2</sub> production in the UK with knock-on impacts to these upstream industries;
  - Claim UK origin for the Rutile TiO<sub>2</sub> finished in the UK;
  - Export "UK" Rutile TiO<sub>2</sub> to jurisdictions such as Brazil, the European Union, India, and Saudi Arabia; and
  - Circumvent and evade the ADDs imposed on Chinese Rutile TiO<sub>2</sub> in these jurisdictions, as well as other duties imposed on Chinese Rutile TiO<sub>2</sub> in jurisdictions such as the United States.
15. Using the same logic, LB Group could also undermine the effectiveness of UK ADDs: base pigment is lower-priced than finished Rutile TiO<sub>2</sub>, so that exports of base pigment would attract less ADDs. This would hollow out the protection necessary to keep the Applicant in business.
16. This is not idle speculation: [*Sensitive information redacted: Applicant's market knowledge*].<sup>14</sup>
17. LB Group's strategy brings about a significant risk that jurisdictions around the world will take enforcement action against the UK. In the first place, jurisdictions that imposed ADDs on Chinese Rutile TiO<sub>2</sub> will scrutinize increased UK exports for circumvention of their ADDs. As finishing adds limited value, using Chinese base pigment will constitute circumvention under the generally applicable anti-circumvention rules. If exports of finished Rutile TiO<sub>2</sub> are exported as "UK origin," there could also be anti-fraud enforcement action for origin fraud. Given LB Group's track record of dumping, UK exports could also become the target of fresh anti-dumping investigations.
18. To mitigate this risk, the TRA should recommend imposing the highest possible duties – at least in line with Brazilian duty levels. Such duties would make it economically unfeasible for LB Group to import base pigment and finish it in the UK. Instead, such duties would force LB Group to actually use the Greatham plant to produce Rutile TiO<sub>2</sub>, thereby increasing value add, employment, and investment in the UK.

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<sup>14</sup> See Application, Section F.2.1, Sub-section E.