20 April 2026

Trade Remedies Authority
North Gate House
21-23 Valpy Street
Reading
Berkshire
RG1 1AF

via UK Trade Remedies Services

OPEN

Dear Sir or Madam,

Re: AD0086 – Comments on product scope
Our client: Kronos Group ("Kronos")

Kronos is a leading global producer and marketer of value-added titanium dioxide ("**TiO2**") pigments, a base industrial product used in a wide range of applications. Kronos operates TiO2 production facilities in Belgium, Canada, Germany, Norway, and the United States.

Kronos is a leading producer of TiO2 for ink applications and Kronos hereby provides its comments on your services' Note to the file of 2 April 2026 inviting comments on certain interested parties' requests[1] to exclude TiO2 for ink applications from the scope of the captioned investigation ("**Investigation**").

As detailed below, Kronos considers that the Trade Remedies Authority ("**TRA**") should reject the requests to exclude TiO2 for ink applications from the scope of the Investigation because:

- TiO2 for ink applications is not extraordinary or unique. It can be and is used in various applications. Further, TiO2 for ink applications cannot be physically distinguished from other TiO2, including by testing by customs authorities (Section 1);
- The price of TiO2 for ink applications means users will switch to TiO2 marketed for ink applications for use in other applications (Section 2); and
- European producers of TiO2 for ink applications have ample capacity to supply the UK market (Section 3).

[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; LB, Scope comments of 31 March 2026.

1. TiO2 for ink applications is not extraordinary or unique

1. In Kronos's experience, ink producers purchase several types of TiO2. Some types of TiO2 are specifically recommended for ink applications, but other types of TiO2 are not. This confirms that, in general, there is nothing extraordinary or unique that sets apart TiO2 for ink applications from TiO2 used in other applications.

2. This is confirmed by the fact that almost all TiO2 for ink applications can and is also used for a wide range of other applications. For example, all of Kronos's TiO2 grades for ink applications are also recommended for use in a range of other applications.[2]

3. This interchangeability in terms of end uses follows from the fact that the composition of TiO2 for ink applications, in terms of both TiO2 content and surface treatment, overlaps with the composition of TiO2 for other applications.[3] In other words: there is no way to physically or chemically distinguish between TiO2 for ink applications and TiO2 for other applications. Practically, customs authorities cannot distinguish between TiO2 that is – or purportedly is – for ink applications and TiO2 for other applications.

4. The absence of physical and chemical distinctions between TiO2 for ink applications and TiO2 for other applications is further evidenced by Kronos's safety data sheets ("**SDS**"). TiO2 grades for ink applications and TiO2 grades for other applications, such as paints, coating, paper, and plastics produced by Kronos are covered by the same SDS. That demonstrates that their safety classification, physical and chemical properties, stability, reactivity, components, and use and risk management conditions are identical.[4]

5. Finally, the fact that TiO2 for ink applications is not special is also confirmed by the fact that, in addition to Kronos (which produces TiO2 for ink applications at its German and Norwegian facilities), other suppliers that are geographically close to the United Kingdom also produce TiO2 for ink applications: EU producers Cinkarna and Nuova Solmine (the new owner of the former Venator Italian facility) also produce TiO2 for ink applications.

2. The price of TiO2 for ink applications means users will switch to TiO2 marketed for ink applications for use in other applications

6. Kronos's price levels confirm that prices of TiO2 for ink applications are not higher than TiO2 for other applications. [*Sensitive information redacted – Kronos's business data about prices*].

Figure 1 - Kronos's average sales price per application (USD/MT)

[*Sensitive information redacted – Kronos's business data*]

7. [*Sensitive information redacted – Kronos's business data about prices*] means that there is no price differential that would stand in the way of users switching to TiO2 for ink

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2 Kronos, List of grades worldwide, **Annex 1**, p. 5 (tables "Fields of application")

3 Kronos, List of grades worldwide, **Annex 1**, p. 5 (table "chemical and physical characteristics").

4 Kronos, Safety data sheet according to Regulation (EC) No 1907/2006, **Annex 2**.

applications should TiO2 for ink applications be excluded from the scope of the Investigation. This also again confirms that there is nothing extraordinary or unique about TiO2 for ink applications.

8. [*Sensitive information redacted – Kronos's business data*] Chinese TiO2 producers' price pressure is particularly strong in the ink market – which is yet another reason to reject requests to exclude TiO2 for ink applications from the scope of the Investigation.

3. European producers of TiO2 for ink applications have ample capacity to supply the UK inks market

9. The requests for excluding TiO2 for ink applications suggest that the UK market would face supply constraints if anti-dumping duties are imposed on TiO2 for ink applications.[5]

10. That is factually incorrect. The European production capacity of TiO2 grades for ink applications in Europe is more than sufficient to supply ink producers in the European Union and the United Kingdom.

11. Kronos manufactures TiO2 for ink applications at its Nordenham facility in Germany, which has a capacity of [*50-60,000*] MT, and its facility in Norway, which has a capacity of [*30-40,000*] MT. In addition, TiO2 for ink applications is manufactured at Cinkarna's facility in Slovenia, which has a capacity of 70,000 MT, and Nuova Solmine's facility in Italy, which has a capacity of [*Sensitive information redacted – Kronos' market knowledge*]. The combined production capacity of these European producers is thus [*160-220,000*] MT. This is ample capacity to supply EU and UK ink producers.

4. Conclusions

12. TiO2 for ink applications cannot be physically or chemically distinguished from TiO2 for other applications and is, in the real world, used for a wide range of other applications. The fact that TiO2 for ink applications is not extraordinary or unique is confirmed by its price: TiO2 for ink applications is sold at prices that are lower than those for all other applications.

13. Excluding TiO2 for ink applications from the scope of the Investigation would thus create a wide hole in any anti-dumping duties that the TRA may impose: Chinese TiO2 producers could continue to sell TiO2 at rock-bottom, dumped prices without paying anti-dumping duties. That TiO2 is used in a wide range of applications – inks and other. Further, such a product exclusion would incentivize Chinese TiO2 producers to rebrand various TiO2 grades to claim they are recommended "for ink applications" so as to evade anti-dumping duties.

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5 *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. 14-5; CNCIA, Pre-sampling questionnaire, pp. 12-14; LB, Scope comments of 31 March 2026, pp. 9-10.

14. For those reasons Kronos requests the TRA to reject the requests to exclude TiO2 for ink applications from the scope of the Investigation.

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