



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):	BILLIONS EUROPE LTD.
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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).

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:	AD0086@traderemedies.gov.uk



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).

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).



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](#)¹ 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.

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



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.



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.

Response: Not applicable



- 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.

Response: BILLIONS EUROPE LTD. is a member of the Titanium Dioxide Manufacturers Association (TDMA) and the Titanium Dioxide Industry Consortium (TDIC)

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.

Response: Not applicable; BILLIONS EUROPE LTD. is not located in 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.

- 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)	
Total production capacity in the POI (metric tonnes)	

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](#).

Company name	Company location (city, country)	Activities	Relationship



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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)	
Total domestic sales value in the POI (£ GBP)	

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.

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?

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



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.**

Response: Not applicable; BILLIONS EUROPE LTD. is not located in 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.

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

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)	
Total indirect export volume in the POI (metric tonnes)	
Total direct export value in the POI (£ GBP)	
Total indirect export value in the POI (£ GBP)	

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

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.

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)	[9,500-12,000]
Total import value in the POI (£ GBP)	[13,500,000-18,000,000]

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
LB GROUP Co., LTD.	Zhongzhan District, Jiaozuo City, Henan, China	Producer of rutile titanium oxides	Shareholder (ultimate parent company)
LB SICHUAN TITANIUM INDUSTRY CO., LTD.	Xinshi Industrial Development Zone, Mianzhu City, Sichuan, China	Producer of rutile titanium oxides	Wholly owned subsidiary of LB Group Co., LTD. (sister company)
LB LUFENG TITANIUM INDUSTRY CO., LTD	Yangjie Street, Qinfeng Town, Lufeng County, Chuxiong Yi Autonomous Prefecture, Yunnan	Producer of rutile titanium oxides	Wholly owned subsidiary of LB Group Co., LTD.



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			(sister company)
HENAN BILLIONS ADVANCED MATERIAL CO., LTD.	Zhongzhan District, Jiaozuo City, Henan, China	Producer of rutile titanium oxides	Wholly owned subsidiary of LB Group Co., LTD. (sister company)
Billions (Hong Kong) Corporation	Unit 1503, 15/F, One Harbourfront, 18 Tak Fung Street, Hunghom, Kowloon, Hong Kong	Purchase and Sales of rutile titanium oxides	Wholly owned subsidiary of LB Group Co., LTD. (100% shareholder of BILLIONS EUROPE LTD.)
LB XIANGYANG TITANIUM INDUSTRY CO., LTD	1 Bianhe Road, Chengguan, Nanzhang, Hubei, China	Producer of rutile titanium oxides	Wholly owned subsidiary of LB Group Co., LTD. (sister company)

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.



Response: Not applicable

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

Response: LB Group produces sulphate-process and chloride-process rutile titanium dioxide pigments. UK produced goods are only produced via the chloride-process.

The goods produced by LB Group are used in mostly similar applications to those of UK producers, except for those applications reliant on sulphate-process pigments e.g. printing inks. Printing inks producers are almost wholly reliant on sulphate-process rutile titanium dioxide pigments. There are no rutile titanium dioxide pigments produced in the UK designed for use in printing ink applications and those grades designed for other applications are unsuitable for use in printing inks.

There are differences in technical characteristics of sulphate-process rutile titanium dioxide pigments compared to chloride-process rutile titanium dioxide pigments. To the extent that is known, chemical composition of UK produced pigments compared with LB Group pigments is broadly similar, though some pigments may differ in surface treatments, leading to chemical and compositional differences.

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.

Response: Not applicable; BILLIONS EUROPE LTD. is not a producer in the UK.

20. Please describe the goods that you produce in the UK and that you consider to be like the goods concerned.



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)	
Total production capacity in the POI (metric tonnes)	

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)	
Total domestic sales value in the POI (£ GBP)	
Total export sales volume in the POI (metric tonnes)	
Total export sales value in the POI (£ GBP)	

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.

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



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
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – contains personal information]
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – contains personal information]
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – contains personal information]
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	

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.

Response: The company does not know such information.



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.

Response: BILLIONS EUROPE LTD. respectfully requests the TRA to exclude ink-grade TiO₂ from the scope of the present investigation. This type of TiO₂ (1) is not "like" other TiO₂ types covered by the investigation; and (2) since there is no UK production of ink-grade TiO₂, imposing duties on such products would run contrary to the UK's economic interest, under paragraph 25 of Schedule 4 of the Act.

As to the first point, BILLIONS EUROPE LTD. submits that ink-grade TiO₂ is physically, functionally, and commercially unlike² other types of TiO₂ covered by this investigation; even the production process of ink-grade TiO₂ is unique. Ink-grade TiO₂ (such as TR52, produced by LB Group) has [CONFIDENTIAL – sensitive details as to the specific physical characteristics of the ink-grade TiO₂ produced by the LB Group]. Standard TiO₂ will not deliver these features in inks. The application thickness of ink-grade TiO₂ when in an ink is only [0-15]µm, whereas other TiO₂ (e.g., when used in coatings) is applied at a thickness of >25µm.

These unique properties make TiO₂ such as TR52 uniquely suited for use by the inks industry. Contrary to what the applicant claims, TiO₂ of all kinds are not "highly interchangeable".³ Major ink producers have reported that ink-grade TiO₂ cannot be substituted without sacrificing quality and consumer perception. In this sense, ink-grade TiO₂ has a specific end-use that cannot be satisfied by other types. BILLIONS EUROPE LTD. notes that similar considerations led the TRA to exclude Sustainable Aviation Fuels from the scope of its *Biodiesel* investigations.⁴ In fact, the applicant itself recognizes the relevance of end-uses in this regard. To this end, the applicant has requested the exclusion of anatase TiO₂ on the ground of "specialty applications".⁵

That is not all. Ink-grade TiO₂ is commercially distinct in the UK as well: since there is no domestic production of this type of TiO₂, this product reaches users exclusively through the channel of imports. Finally, the production process of ink-grade TiO₂ also matters, since only the sulphate process of manufacturing – such as the one used by BILLIONS EUROPE LTD.'s parent company, LB Group Co., LTD. can produce high quality ink-grade TiO₂. In this regard, the applicant incorrectly claims that the difference in production process (sulphate v/s chloride process) does not

² See, Case AD0049 – Suspension Poly (Vinyl Chloride) from the United States of America, para. 67.

³ Application, page 11.

⁴ See in this regard, Case TS0044 – Biodiesel from Argentina, Final Determination of 22 April 2025, Section E3.1; and Case AD0058 – Biodiesel from China, Note to public file – Revising scope of 23 August 2024.

⁵ Application, page 7.



impact the product so manufactured.⁶ The UK TiO₂ industry does not use the sulphate process – as acknowledged by the applicant⁷ – and, in any event, manufacturing ink-grade TiO₂ requires specialized technical know-how, which the UK industry does not possess.

As to the second point, imposing anti-dumping duties on ink-grade TiO₂ will run contrary to the overall economic interest of the UK, since UK users currently have no domestic source of such TiO₂. Imposing duties on ink-grade TiO₂ will increase costs for UK ink producers, which will, in turn, make them less competitive vis-à-vis their foreign competitors. In the past, the TRA has accepted requests for exclusion of products on the basis that the UK industry has no indigenous production thereof.⁸

⁶ Application, page 10.

⁷ Application, page 12.

⁸ Cases AD0047 and AS0046 – Certain Excavators from China, Final Negative Determinations.



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

Response: BILLIONS EUROPE LTD. does not have any comments on the PCN structure for now.

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

Response: BILLIONS EUROPE LTD. does not have any comments on the PCN structure for now. BILLIONS EUROPE LTD. however notes that while its related manufacturing entities use the sulphate production process and the chloride production process, all producers in the UK only use the chloride production process.



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?

Response: BILLIONS EUROPE LTD. submits that, for the reasons set out in the reply to question 27 above, ink-grade TiO₂ is not "like" other TiO₂ types covered by the investigation. Moreover, there is no production in the UK of such ink-grade TiO₂ meaning that ink-grade TiO₂ imported by BILLIONS EUROPE LTD. cannot be compared with domestically produced products.

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.

Response: BILLIONS EUROPE LTD. considers that the price of ink-grade TiO₂ imported by BILLIONS EUROPE LTD. – and produced through the sulphate production process – cannot be (directly) compared with regular TiO₂ produced by UK producers (which only use the chloride production process).

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.



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Company name	Company location (city, country)	Contact details (email/tel.)	Relationship	Contact permission (Y/N)
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Customer	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Customer	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Customer	
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Customer	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Customer	
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Customer	
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Customer	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Customer	
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Customer	
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Customer	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Customer	Y



sensitive information]	sensitive information]			
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Customer	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Customer	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Customer	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Customer	Y
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Customer	
[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	[redacted – commercially sensitive information]	Customer	Y

[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.

Response:

BILLIONS EUROPE LTD. does not object to the use of India as a representative third country.

As concerns the proposed selection of Brazil, BILLIONS EUROPE LTD. requests the TRA to also consider Mexico and Malaysia as representative third countries. Both countries are producers of TiO₂, and as shown below, have a level of economic development that is similar to China.

Mexico in particular is a more appropriate representative country than Brazil with regard to the relevant metrics.

First, publicly available information indicates that Mexico has a significantly larger production capacity of TiO₂ than Brazil. For example, Chemours' Mexico plant has a larger nameplate capacity (200,000 MT)⁹ than the principal producer of TiO₂ in Brazil (60,000 MT).¹⁰ Thus, given that China is also a major producer of TiO₂, Mexico is a more appropriate third country than Brazil.

Second, as shown in the table below, Mexico and Malaysia are more similar to China in respect of the economic indicators that have been considered by the TRA in previous investigations¹¹ than Brazil. Moreover, Mexico and Malaysia are superior comparators than Brazil with regard to indicators which are specifically informative to the cost of production, such as GDP per capita, level of employment in industry, and manufacturing value added.

Indicator	China	Mexico	Malaysia	Brazil
GDP per capita ¹²	13,303.1	14,185.8	11,874.43	10,310.5

⁹ <<https://www.chemours.com/en/news-media-center/all-news/press-releases/2016/chemours-begins-commercial-operations-of-new-altamira-tio2-line-in-mexico>>.

¹⁰ Application, page 41.

¹¹ See e.g., Case AD0058, Biodiesel from China, Note to public file - proposed appropriate representative third country, page 2.

¹² World Bank, GDP per capita (current US\$), available for download at: <<https://data.worldbank.org/indicator/NY.GDP.PCAP.CD>>.



Level of employment in industry as a % of total employed ¹³	32	25	26	20
Manufacturing value added ¹⁴	25	20	23	12
Life expectancy ¹⁵	78	75	77	76
Literacy rate ¹⁶	97	96	96	95

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.

Response: As noted in response to question 33, BILLIONS EUROPE LTD. requests the TRA to consider Mexico and Malaysia as alternative third countries. BILLIONS EUROPE LTD. reserves its right to submit further comments on representative third countries.

¹³ World Bank, Employment in industry (% of total employment) (modelled ILO estimate), available at: <https://data.worldbank.org/indicator/SL.IND.EMPL.ZS>.

¹⁴ World Bank, Manufacturing, value added (% of GDP), available for download at: <https://data.worldbank.org/indicator/NV.IND.MANF.ZS>.

¹⁵ World Bank, Life expectancy at birth, total (years), available for download at: <https://data.worldbank.org/indicator/SP.DYN.LE00.IN>.

¹⁶ World Bank, Literacy rate, adult total (% of people ages 15 and above), available at: <https://data.worldbank.org/indicator/SE.ADT.LITR.ZS>.



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).

Response: At this time, BILLIONS EUROPE LTD. is not aware whether the producers in the proposed representative countries would be willing to participate in the investigation. In this respect, BILLIONS EUROPE LTD. notes that price data relating to feedstocks can be obtained from international market platforms, as noted below. Additionally, the cost of energy and labour can be obtained from publicly available sources such as government databases and the International Labour Organization (ILO) website.¹⁷ In BILLIONS EUROPE LTD.'s view, even if producers in third countries do not participate in the investigation, the TRA has access to sufficient information on which to establish a benchmark. Thus, the fact that producers in one country participate should not be a decisive factor in the selection of a representative third country.

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 situation¹⁸ in the People's Republic of China, please do so, including reasons and relevant information.

Response: BILLIONS EUROPE LTD. submits that the prices for TiO₂ in China are not artificially low and do not represent non-commercial factors. Thus, there is no PMS within the China TiO₂ market. Moreover, assuming for arguments sake that a PMS exists, such PMS does not impair a proper comparison between domestically sold goods and exports.

BILLIONS EUROPE LTD. also disagrees that there is a PMS with regard to the market for feedstocks in China. In this regard, BILLIONS EUROPE LTD. notes that LB Group imports a significant proportion of its feedstocks, and that the prices for those raw

¹⁷ <https://ilostat.ilo.org/>.

¹⁸ [Trade Remedies Authority \(TRA\) dumping, subsidisation and safeguarding investigations guidance - Particular market situation and costs adjustments - Guidance - GOV.UK](#)



materials are in line with international market prices. Therefore, prices of feedstocks in China are neither artificially low nor do they reflect non-commercial factors. Thus, there is no PMS in the market for feedstocks in China within the meaning of Regulation 7(4).

In this regard, BILLIONS EUROPE LTD. notes that, as the European Commission ("EC") stated in its Determination, "*either no reliable statistics or no statistics allowing for differentiation based on TiO₂ concentration in the ores are available*" with regard to any third country.¹⁹ This is particularly important since TiO₂ producers use ores and grades with varying concentrations of TiO₂, which, in turn, has a significant impact on price.

Thus, BILLIONS EUROPE LTD. requests the TRA to consider prices from the TZMI²⁰, a widely recognised ore market platform, to establish benchmarks for feedstocks. BILLIONS EUROPE LTD. considers that this approach will allow the TRA to arrive at a representative normal value.

Finally, [CONFIDENTIAL – information concerning costs of production that is confidential by nature and whose disclosure (even in summarised form) would have an adverse impact on the organization providing the information and/or would provide an unfair advantage to competitors. Hence, confidentiality is hereby requested].

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

¹⁹ 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, recital (206).

²⁰ <https://www.tzmi.com/>.