

MINISTRY OF COMMERCE & INDUSTRY
(Department of Commerce)
Directorate General of Anti Dumping & Allied Duties

Notification
No.64/1/2000-DGAD

New Delhi, the 22 February, 2001

PRELIMINARY FINDINGS

Subject: Anti-dumping investigation concerning imports of White Cement originating in or exported from the UAE and Iran- preliminary findings

No. 64/1/2000-DGAD - The Government of India having regard to the Customs Tariff Act, 1975 as amended in 1995 and the Customs Tariff (Identification, Assessment and Collection of Anti Dumping Duty on Dumped Articles and for Determination of Injury) Rules, 1995, thereof;

A. PROCEDURE

2. The procedure described below has been followed:-

- i. The Designated Authority (hereinafter referred to as Authority), under the above Rules, received a written petition from M/s. Grasim Industries Limited and M/s. JK Synthetics Ltd., on behalf of the domestic industry, alleging dumping of White Cement (hereinafter referred to as subject goods) originating in and exported from the UAE and Iran (hereinafter referred to as subject countries) ;
- ii. The Authority notified the Embassies of subject countries in India about the receipt of dumping application made by the petitioner before proceeding to initiate the investigation in accordance with sub-rule (5) of Rule 5 *supra*;
- iii. The Authority issued a Public Notice dated 6th December, 2000 published in the Gazette of India, Extraordinary, initiating anti dumping proceedings concerning imports of White Cement originating from UAE and Iran classified under heading 2523.21 of Schedule I of the Customs Tariff Act, 1975;
- iv. The Authority forwarded copy of the said public notice to the known exporters, importers, industry associations and to the complainant and gave them an opportunity to make their views known in writing.
- v. According to sub-rule (3) of Rule 6 *supra*, the Authority provided a copy of the petition to all the known exporters and Embassies of subject countries in India.

- vi. The Authority sent questionnaires, to elicit relevant information, to the following exporters:
1. M/s. Saveh White Demant C.(SWCC), Tehran, Iran.
 2. M/s. Ras Al Khaimah Co., UAE
- vii. The Embassies of UAE and Iran in New Delhi were also informed about the initiation of investigation and requested to advise the exporters/producers from their countries to respond to the questionnaire within the prescribed time;
- viii. The questionnaire was sent to the following users/importers of White Cement:
1. M/s. Rajhans, Rajkot
 2. M/s. Nirav Sales, Morvi
 3. M/s. Safa Establishment P Ltd., Kochi
 4. M/s. Sahajanand Corporation, Morvi
 5. M/s.Himathbhai, Rajkot
 6. M/s. Pravinbhai, Rajkot
 7. M/s. Hasubhai, Rajkot
 8. M/s. Girishbhai, Morbi
 9. Maheshbhai, Rajkot
 10. Bhapabhai, Rajkot
 11. BM Patel, Rajkor
 12. Prabhudas Bhai, Morbi
 13. Harish Bhai, Rajkot
 14. Jagdishbhai, Rajkot
 15. Shivlalbhai, Rajkot
 16. Bipinbhai, Valsad
 17. Dinesh Chadha, Silvassa
 18. M/s. Lavanya Paints, Allapuzha
 19. Rajeshbhai, Valsad
 20. M/s. Jaya Paints, Ernakulam
 21. M/s. Shellcam, Kotayyam
 22. M/s. Cochin paints, Cochin
 23. M/s. Umiya Mosiac Tiles, Valsad
 24. Dayabhai, Valsad
 25. M/s. Classic Paints, Ernakulam
 26. Pravin C Patel, Gandhinagar
 27. Gummoabbat Sheikh, Ahmedabad
 28. Hemant bhai, Rajkot
 29. M/s. Western Paints, Ernakulam
 30. M/s. Krishna Industries, Allapuzha
 31. M/s. Mangalam Paints, Cochin

32. Farooqbhai/Satar bhia, Ahmedabad
33. M/s. TCL Ltd., Kottayam
34. M/s. Hero Coatings, Kottayam
35. Bharat bhai, Valsad
36. Bharat bhai, Rajkot
37. AR Shah, Ahmedabad
38. Hasmukh Patel, Dadra
39. Kantibhai, Gondal
40. M/s. Super Paints, Ernakulam
41. M/s. Malabar Paints, Ernakulam
42. M/s. Continental Coatings, Ernakulam
43. M/s. Five Star Industries, Ernakulam
44. M/s. Premier Paints, Trivandrum
45. M/s. Choice Paints, Ernakulam
46. Bachubhai, Rajkot

- ix. Among the users/importers, response to the questionnaire was filed by M/s. Rajhans Distributors Pvt. Ltd., M/s. Akshayalakshmi Trading Pvt Ltd., and M/s. Sree Lakshmi Traders, Chennai. Among the exporters, M/s. Ras Al Khaimah Co., For White Cement & Construction Materials, UAE, have filed response to the questionnaire.
- x. Additional information regarding injury was sought from the petitioners, which was also furnished;
- xi. The Authority kept available non-confidential version of the evidence presented by various interested parties in the form of a public file maintained by the Authority and kept open for inspection by the interested parties;
- xii. ***** in this notification represents information furnished by the interested party on confidential basis and so considered by the Authority under the Rules;
- xiii. The Authority sought and verified information given by the domestic industry and to this end investigations were carried out at the premises of the petitioners' at Jodhpur and Kharia in Rajasthan;
- xiv. The Authority also conducted cost investigation and worked out optimum cost of production and cost to make and sell subject goods in India on the basis of Generally Accepted Accounting Principles;
- xv. The investigation covered the period from 1st January 1999 to 30th June 2000.
- xvi. Copies of initiation notice was also sent to FICCI, CII, ASSOCHAM etc., for wider circulation.

B. PETITIONER'S VIEWS

3. The petitioners have made the following major points in their submissions:

- i. The petitioners' represent the domestic industry and white cement being produced by the petitioners' is a like product to the white cement being imported from subject countries
- ii. Iran and UAE are dumping subject goods in India and the petitioner has, therefore, approached the Designated Authority for considering levy of anti dumping duty.
- iii. Regarding the normal value, petitioners made efforts to get information on the domestic prices of subject goods in subject countries. However, they could not get a reasonable and authentic evidence of the local prices charged by the manufacturers in the UAE and Iran or for their exports to other countries. Therefore they constructed the normal value in UAE and Iran on the basis of the details of cost of production for basic raw material and prices of utilities etc., on the basis of the industry norms;
- iv. The export price has been claimed on the basis of the data compiled by the Director General Commercial Intelligence & Statistics, Calcutta. Price adjustments have been claimed on account of landing charges, ocean freight, marine insurance, commission, port handling etc., to arrive at net export price.
- v. There has been significant increase in the imports specifically since January 1999 of subject goods which has increased approximately at the rate of 8 per cent per quarter;
- vi. The increase of dumped imports is particularly in the coastal regions of Gujarat, Maharashtra, Kerala and Tamil Nadu, particularly because of the close proximity of these places with the sea ports and some of the major consumers in these States;
- vii. The dumped imports have at this stage affected the sales of the domestic industry and undercutting their prices. The Indian manufacturers have been forced to lower their selling prices in these regions as compared to other regions. The existence of significant price under-cutting has caused injury and threatening further injury to the Indian producers which is likely to spread to other regions as well;
- viii. The dumped imports are causing severe threat to the domestic industry as there has been a significant rate of increase in imports of subject goods in the last two years and there is a very strong likelihood of these imports increasing substantially should the anti dumping duties not be clamped quickly.
- ix. The threat of injury is also manifest in the form of price under-cutting which is the result of the selling price of imported product being significantly below the selling price of domestic industry;
- x. The exporters in subject countries are holding substantial surplus capacities. The demand of white cement in these countries is far lower than the capacities created by the manufacturers and they have to look for off-shore destinations to increase their sales to ensure reasonable utilisation of their excess capacities;

- xi. The manufacturers in the subject countries are holding substantial surpluses in view of creation of new capacities without much increase in their domestic market. These inventories are going to cause substantial injury to the domestic industry in near future when the exporters from these countries dump subject goods to clear these stocks;

C. IMPORTERS AND EXPORTERS' VIEWS

4. The importers and exporters have expressed following views in support of their petition:

- i. We submit that the complaint lodged by M/s. Grasim Industries Ltd., and M/s. JK Synthetics Ltd., is wholly untenable in law and fact and the same is bereft of bonafides. The complaint is the product of trade rivalry. It is not based on any genuine grievances;
- ii. We also dispute that the cement imported by us are 'like article' to the goods produced by the complainants. There is a world of difference in quality between the imported cement and the white cement produced by the complainants;
- iii. We do not admit that the normal value of the subject goods is significantly higher than the net export price and that the subject goods are being dumped by the exporters from the subject countries;
- iv. The price of the imported cement per 50 kgs bag is more than the domestic cement produced by the complainants at least by Rs.5 to Rs.10 per kg. While so, anti dumping duty is not attracted in the case of the imported product being higher than value obtained in domestic market. There is absolutely no case made out by the complainants for initiation of proceedings under anti dumping laws;
- v. With regard to the allegation made by the complainants that the injury is being caused especially in the coastal areas on account of price suppressing resulting from dumped imports landing in these areas, there is absolutely no warrant for such an allegation. There has been no price undercutting and erosion in the profitability for the domestic industry in the coastal areas. The Statement given above belies the charge of under cutting;
- vi. We submit that the domestic industry has not suffered any injury consequent to the import of foreign white cement. Not even plausible explanation offered justifying the allegation of material injury;
- vii. The very initiation of anti dumping investigation is based upon the one sided version of the complainants, who appear to have given distorted facts and figures in order to drive us from the trade;

- viii. The petitioners have enjoyed a monopoly situation in the market, until our product was made available with competence in the market. Our presence in the market, has been only to the advantage of the end consumer, to whom the white cement was made available in the market without compromise to quality and value for money;
- ix. We request the Designated Authority to refer to order Nos.37-40/2000-AD of the Hon'ble CEGAT, (2000 (122) ELT 412 (Tribunal) , wherein the Hon'ble CEGAT have given certain directions on methodology for calculation of normal value and dumping margins;

D. Examination and Findings by Authority

5. The submission made by the exporters, importers, domestic industry and other interested parties have been examined and considered while arriving at these findings and wherever appropriate have been dealt hereinafter.

6. The Authority confirms, the absence of any direct response from the exporters from Iran in the form and manner prescribed and having made the findings with regard to exports from Iran on the basis of the fact available to it as per rule 6(8) *supra*.

7. The cases of new exporters or those stated to be willing to give price undertaking shall be considered, on request, by the Authority in accordance with the Rules *supra*.

E. PRODUCT UNDER CONSIDERATION AND LIKE ARTICLE

8. The product under consideration is "white portland cement" which is normally referred to as "white cement". It is a construction material and used for non structural purposes such as flooring of tiles, cement based exteriors, paints and cement varnish etc. This falls within Chapter 25 of the Custom Tariff Act under the sub-heading 2523.21. The Custom classification is indicative only and not binding on the scope of investigation.

9. The goods produced by the domestic industry are like articles to the goods being exported from UAE and Iran to India. Though the exporters from UAE and the importers in India have claimed that the white cement being manufactured and sold by them is of superior quality but there is no argument that it is not substituting the product being manufactured by the domestic industry. Therefore, for the purpose of investigation, the goods produced by the petitioners are being treated as 'like articles' of white cement imported from the subject countries within the meaning of the Rules.

F. DOMESTIC INDUSTRY

10. There are three producers of the subject goods in India namely, M/s. Grasim Industries Limited, M/s. JK Synthetics Limited and M/s. TCL Limited, Kerala. The petition has been filed by M/s. Grasim Industries Limited and M/s. JK Synthetics Ltd., on behalf of the domestic industry. These two producers account for more than 90 per cent of the total domestic production and thus have the standing to file the petition. None of the respondents have challenged this claim. Therefore, as far as the issue of standing of the petitioners to file the petition is concerned, there is no dispute and the Authority has determined that petitioners represent the domestic industry for the purpose of present investigation.

G. Dumping & examination of claims made on Normal Value & Export Prices

Normal Value

11. Under Section 9A(1)©, normal value in relation to an article means:

- i. The comparable price, in the ordinary course of trade, for the like article when meant for consumption in the exporting country or territory as determined in accordance with the rules made under sub-section(6); or
- ii. when there are no sales of the like article in the ordinary course of trade in the domestic market of the exporting country or territory, or when because of the particular market situation or low volume of the sales in the domestic market of the exporting country or territory, such sales do not permit a proper comparison, the normal value shall be either -
 - a. comparable representative price of the like article when exported from the exporting country or territory or an appropriate third country as determined in accordance with the rules made under sub-section (6); or
 - b. the cost of production of the said article in the country of origin along with reasonable addition for administrative, selling and general costs, and for profits, as determined in accordance with the rules made under sub-section (6);

12. The Authority sent questionnaires to all the known exporters for the purpose of determination of normal value in accordance with Section 9A(1)©. However, none of the exporters from Iran responded to the Authority and have not furnished any information. The Authority, therefore, holds that none of the exporters from Iran have cooperated with the Authority as envisaged under the Rules. The domestic industry has furnished information with regard to the normal value in Iran based on the

constructed cost of production. In view of non cooperation from the exporters from Iran, the Authority has determined normal value in Iran on the basis of the constructed cost of production.

13. M/s. Ras Al Khaimah Co. for White Cement and Construction Materials, UAE, has furnished information regarding the domestic sales price and the export price in their response submitted to the Designated Authority. However, information regarding the cost of production, profit on the domestic sale and the exports to India and to countries other than India, sale price structure for domestic sales, for exports to India and for exports to countries other than India, have not been provided in the prescribed format. No documentary evidence regarding ocean freight, invoices of domestic sales etc., have been furnished. Also non confidential summary of the confidential information submitted have not been furnished. Because of the non availability of information, as mentioned above, it is difficult to determine as to whether the domestic sales are in the ordinary course of trade and also as to what kind of adjustment such as commission, domestic freight, insurance, handling charges etc., are admissible. However, for the purpose of preliminary findings the Designated Authority has decided to work out the normal value and dumping margin on the basis of the information provided for domestic sales by the exporter. The Authority reserves the right to ignore the information furnished by the exporter in case complete information is not furnished along with the non confidential summary within 40 days of issue of these findings.

Export price

14. M/s. Ras Al Khaimah Co., UAE has furnished information regarding their exports to India and elsewhere during the period of investigation. The FoB export price to India works out to US\$ *** per MT. No information has been furnished regarding adjustment that can be claimed in export price as per the Rules. In the case of Iran, the DGCIS data regarding the volume and price of export has been used. After making the adjustments on the basis of information furnished by the domestic industry the net export price has been worked out as US\$*** per MT for the period of investigation.

Dumping margin

15. The principles governing the determination of normal value, export price and the dumping margin as laid down in the Custom Tariff Act and the Anti Dumping Rules are elaborated in Annexure I to the Rules. For the purpose of the fair comparison between the normal value and export price, the Authority has made calculations and comparisons at the same level of trade.

16. The normal value for Iran based on the constructed cost of production works out to US\$ *** per MT. The net export price worked out on the basis of similar parameters and allowing similar adjustments works out to US\$ *** per MT. The dumping margin for exports of the subject goods from Iran comes to % of the export price.

17. In the case of M/s. Ras Al Khaimah Co., UAE, the domestic sales have been made during the period of investigation @ *** UAE Dirhams per MT on the average (equal to US\$ *** per MT) as per the submissions made by them which is being taken as the normal value. The FoB export price to India, as stated above, has been worked out as US\$ *** per MT. No adjustments have been claimed both in the domestic sales price as well as the FoB export price to India making them comparable at similar level of trade. The dumping margin on the basis of the information submitted by the exporter comes to % of the export price for M/s. Ras Al Khaimah Co., UAE and the Authority intends to use the same margin for all the exporters from UAE because as per the information available there is only one manufacturer of white cement in UAE.

H. Injury

18. Rule 11 of Anti Dumping Rules reads as follows:

"Determination of Injury:

1. In the case of imports from specified countries, the designated authority shall record a further finding that import of such article into India causes or threatens material injury to any established industry or materially retards the establishment of any industry in India;
2. The designated authority shall determine the injury to domestic industry, threat of injury to domestic industry, material retardation to establishment of domestic industry and a causal link between dumped imports and injury, taking into account all relevant facts, including the volume of dumped imports, their effect on price in the domestic market for like articles and the consequent effect of such imports on domestic producers of such articles and in accordance with the principles set out in Annexure II to these rules."

Cumulative Assessment of Injury

19. Annexure II (iii) under Rule 11 *supra* further provides that "in cases where imports of a product from more than one country are being simultaneously subjected to Anti dumping investigation, the Designated Authority will cumulatively assess the effect of such imports, only when it determines that the margin of dumping established in relation to the imports from each country is more than two percent

expressed as percentage of export price and the volume of the imports from each country is three percent of the imports of the like article or where the export of the individual countries less than three percent, the imports cumulatively accounts for more than seven percent of the imports of like article, and cumulative assessment of the effect of imports is appropriate in light of the conditions of competition between the imported article and the like domestic articles.

The Authority notes that the margin of dumping and quantum of imports from subject countries are more than the limits prescribed above. Cumulative assessment of the effects of imports are appropriate since the export prices from the subject countries were directly competing with the prices offered by the domestic industry in the Indian market.

Threat of Injury

20. Under Rule 11 *supra*, Annexure II, when a finding of injury is arrived at, such finding shall involve determination of the injury to the domestic industry, "*.....taking into account all relevant facts, including the volume of dumped imports, their effect on prices in the domestic market for like articles and the consequent effect of such imports on domestic producers of such articles.....*". Further to above, regarding threat of injury, para (vii) of Annexure II of Rules *supra*, reads as under:-

" (vii) A determination of a threat of material injury shall be based on facts and not merely on allegation, conjecture or remote possibility. The change in circumstances which would create a situation in which the dumping would cause injury must be clearly foreseen and imminent. In making a determination regarding the existence of a threat of material injury, the designated authority shall consider, *inter alia*, such factors as:

- a. a significant rate of increase of dumped imports into India indicating the likelihood of substantially increased importation;
- b. sufficient freely disposable, or an imminent, substantial increase in, capacity of the exporter indicating the likelihood of substantially increased dumped exports to Indian market, taking into account the availability of other export markets to absorb any additional exports;
- c. whether imports are entering at prices that will have a significant depressing or suppressing effect on domestic prices, and would likely increase demand for further imports; and
- d. inventories of the article being investigated."

21. In considering the effect of the dumped imports on prices, it is considered necessary to examine whether there has been a significant price undercutting by the

dumped imports as compared with the price of the like product in India, or whether the effect of such imports is otherwise to depress prices to a significant degree. For the examination of the impact on the domestic industry in India, the Authority considered such further indices having a bearing on the state of industry as production, sales, stock, profitability, net sales realisation etc.

22. All the economic parameters affecting the domestic industry mentioned above, such as production, capacity utilisation, sales volume etc., have been examined. The capacity utilisation in case of M/s. JK White Cement during the period of investigation has been approximately ***% and that in case of M/s. Grasim Industries was***% during the period of investigation. However, the most clear effect of dumped imports has been on the prices specially in the coastal areas such as Gujarat, Maharashtra, Kerala and Tamil Nadu which has caused injury to domestic industry. There has been a tremendous erosion of the sales in the coastal areas for the domestic industry and the domestic industry has further stated that they are finding it difficult to convince the consumers to continue to buy the domestic product because of the enormous price difference. Even though there may not be an immediate adverse effect on the production and capacity utilisation because of the expanding domestic market, the dumped imports are causing threat of further injury to the domestic industry in coastal areas which is spreading to interior areas as well.

23. Significant rate of increase of import - Over the years the imports of white cement from the subject countries have increased significantly from approximately 1700 MTS in 1996-97 to approximately 9400 MTS during 1999-2000. This rate of increase has intensified during the period of investigation. The quarter wise volume of import has increased as follows:-

Imports-increase trend	Quarterly proportionate import volumes	Rate of increase over 1996-97
1996-97	430	-
1997-98	986	2.29
1998-99	1295	3.01
April-Sept'99	1475	3.43
Oct-Dec'99	2376	5.52
Jan-Mar'00	4099	9.53
April-June'00	3156	7.34
July-Sept'00	3869	8.99

It has been argued by the importers in India and exporters from UAE that the volume of imports from UAE accounts for a very small per cent of the domestic production in India and therefore cannot cause injury. Here it has been stated by the domestic industry that the imports are concentrated at present in the coastal areas of Gujarat, Maharashtra, Kerala and Tamil Nadu . If only the sales made in these areas are taken

into account, imports will work out to be a very significant proportion sufficient enough to adversely affect the sales of the domestic industry.

24. Significant Price Under cutting - The landed price of the imports is significantly below the selling price of the domestic industry in the coastal areas where the transportation cost for the domestic industry is very high. In specific markets, such as Salem, Chennai, Trivandrum, Cochin, Rajkot, Bhavnagar, Morvi etc., there is a significant price under-cutting by imports from UAE and Iran which varies from 14% to 40% of the landed price of the domestic industry taking into account non injurious price and transportation cost.

25. Surplus disposable Capacity - As per the submissions made by the importers and exporters, there was unutilized capacity in UAE of approximately ***** MTs in 1999-2000. As per the information submitted by the domestic industry, there is a total capacity of 1.16 million tones available in Iran and additional capacity of 1, 65,000 MT is being created which will become operational in early 2003. It is further stated that the domestic demand is not sufficient to ensure reasonable capacity utilisation in subject countries and hence the manufacturers have to look for markets abroad. As no response has been received from exporters from Iran, the claim of the domestic industry of their being large spare capacities could not be verified.

26. Inventories - The domestic industry has alleged that producers in Iran and UAE are holding substantial surplus stocks in view of doubling of capacities without much increase in demand. In the case of Iran, this allegation could not be verified in the absence of non cooperation from the exporters. However, as per the information given by the exporter from UAE there is increase in stock during the investigation period from *** MT to ***** MT between 1st January 1999 to 31st June 2000 which is not very significant.

27. Volume and Price Effect – It is the argument of importers and exporter from UAE that a very small quantity of import as compared to the total domestic production is unlikely to have any effect on the domestic industry and cause injury. However, it is seen that even a very small quantity of import at low prices forces the domestic industry to reduce the prices as the buyers start demanding the benchmark set by the landed value of import to be offered to them by the domestic industry as well causing severe price undercutting. This factor along with the factors mentioned in the paragraphs above, justify the claim of the domestic industry of dumped imports causing severe threat of injury to them. It is their contention that if the unfair dumping practice of exporters continues and if not timely checked at this stage, the injury would spread over to other parts of the country other than the coastal areas and would have a long term adverse impact on the Indian white cement industry. On the basis of the evidence available before it, the Authority therefore concludes that there is a

serious threat of injury being caused to the domestic industry on account of dumped imports of subject goods from subject countries.

I. Causal Link

28. In determining whether injury to the domestic industry was caused by the dumped import, the Authority has taken into account the factor that it is the increased dumped import at dumped prices in localized markets which has forced the domestic industry to reduce its prices to the levels not sufficient to recover the non injurious price and the transportation cost to these areas. Therefore, the causal link between the dumped imports of subject goods from subject countries and threat of injury being faced by the domestic industry is clear. The Authority therefore concludes that there is a causal link between the dumping of subject goods from the subject countries and threat of injury being caused to the domestic industry during the period of investigation.

J. INDIAN INDUSTRY'S INTEREST

29. The purpose of anti dumping duties in general is to eliminate dumping which is causing injury to the domestic industry and to re-establish a situation of open and fair competition in the Indian market which is in the general interest of the country.

30. The Authority recognises that the imposition of anti dumping duties might affect the price levels of the products manufactured using White Cement and consequently might have some influence on relative competitiveness of these products. However, fair competition on the Indian market will not be reduced by the anti dumping measures. On the contrary, imposition of anti dumping measures would remove the unfair advantages gained by dumping practices, would prevent the decline of the domestic industry and help maintain availability of wider choice to the consumers of subject goods. The Authority notes that the imposition of anti dumping measures would not restrict imports from UAE and Iran in any way, and therefore, would not affect the availability of the product to the consumers. The consumers could still maintain two or even more sources of supply.

K. CONCLUSIONS

31. The Authority has, after considering the foregoing, come to the conclusion that:

- i. White Cement has been exported to India from UAE and Iran below its normal value;

- ii. the Indian industry has suffered injury and is being threatened with further injury;

32. The Authority considers it necessary to impose an anti dumping duty provisionally, pending final determination, on all imports of White Cement from UAE and Iran in order to remove the injury to the domestic industry. The margin of dumping for known exporter determined by the Authority are indicated in the paragraphs above.

33. Accordingly, the Authority recommends that provisional anti dumping duties as set out below be imposed from the date of notification to be issued in this regard by the Central Government on all imports of white cement falling under customs code 2523.21 originating from UAE and Iran pending final determination. The anti dumping shall be as follows:-

Country -	Anti dumping duty (US\$ per MT)
1. UAE (all exporters including M/s. Al Ras Khaimah Co.)	30
2. Iran (all exporters)	46

L. FURTHER PROCEDURE

34. **The following procedure would be followed subsequent to notifying the preliminary findings:-**

- a. The Authority invites comments on these findings from all interested parties and the same would be considered in the final findings;
- b. Exporters, importers, petitioner and other interested parties known to be concerned are being addressed separately by the Authority, who may make known their views, within forty days from the date of despatch of the letter. Any other interested party may also make known its views within forty days from the date of publication of these findings;
- c. The authority would provide opportunity to all the interested parties for making oral submissions which have to be rendered thereafter in writing;
- d. The Authority would conduct further verification to the extent deemed necessary;
- e. The Authority would disclose essential facts before announcing final findings.

L.V. Saptharish
Designated Authority