

F. No. 6/26/2025-DGTR  
Government of India, Department of Commerce  
Ministry of Commerce & Industry  
(Directorate (General of Trade Remedies))  
4<sup>th</sup> Floor, Jeevan Tara Building,  
5, Parliament Street, New Delhi- 110001

Dated: June 30, 2025

**INITIATION NOTIFICATION**

**Case No. AD (OI) 23/2025**

**Subject: Initiation of Anti-dumping Investigation Concerning Imports of “Linear Low-Density Polyethylene” (LLDPE) originating in or exported from the State of Kuwait, Malaysia, the Sultanate of Oman, the State of Qatar, the Kingdom of Saudi Arabia and the United Arab Emirates**

**F.No. 6/26/2025-DGTR-** Having regards to the Customs Tariff Act, 1975, as amended from time to time (hereinafter also referred to as the "Act") and the Customs Tariff (Identification, Assessment and Collection of Anti-dumping Duty on Dumped Articles and for Determination of Injury) Rules, 1995, as amended from time to time (hereinafter also referred to as the "AD Rules, 1995"), the Chemicals and Petrochemicals Association of India (hereinafter referred to as “CPMA” (hereinafter referred to as the “Applicant Association”), has filed an application before the Designated Authority (hereinafter referred to as the “Authority”) seeking initiation of anti-dumping investigation concerning imports of “Linear Low-Density Polyethylene” (hereinafter also referred to as “LLDPE”), from the State of Kuwait, Malaysia, the Sultanate of Oman, the State of Qatar, the Kingdom of Saudi Arabia and the United Arab Emirates.

2. The Applicant Association has alleged that LLDPE originating in or exported from the aforementioned countries has caused material injury to the domestic industry. Accordingly, the Applicant Association has requested for the imposition of anti-dumping duties on the imports of LLDPE from the aforementioned countries.

**A. PRODUCT UNDER CONSIDERATION**

3. The product under consideration (hereinafter referred to as “PUC”) in the present investigation is Linear Low-Density Polyethylene (hereinafter also referred to as “subject goods”). LLDPE is a copolymer of ethylene and other alkenes such as butene, hexene or octene. This results in an essentially linear chain arrangement, with the comonomer (i.e. the butene, hexene or octene) forming short, regular chains on the main carbon backbone. It is a colourless, non-flammable, non-reactive solid with no odour. It is primarily used in raw material for plastic processing industry to make a variety of products such as packaging films, profiles, wire & cable, extrusion coating, rotational moulded, product, hi-flow grades for injection moulding, master batches etc.

4. The subject goods are classified under Chapter 39 titled "Plastics and articles thereof" under HS Codes 3901 10 10 and 3901 40 10. The customs heading is indicative only and is not binding upon the scope of the PUC.
5. The parties to the present investigation may provide their comments on the scope of the PUC and propose PCNs, if any, within 15 days of the initiation of this investigation.

#### **B. LIKE ARTICLE**

6. The applicant association has claimed that there are no known differences in the subject goods manufactured by applicant producers and the subject goods imported from the subject countries. The subject goods from the two sources are comparable in terms of physical and chemical characteristics, functions and uses, and distribution and marketing. The two goods are technically and commercially substitutable. Consumers have used and are using the goods interchangeably. Thus, for the purpose of the present investigation, the subject goods produced by the applicant producers and the subject goods imported from the subject countries are being treated as 'like article' to each other.

#### **C. DOMESTIC INDUSTRY AND STANDING**

7. The present application has been filed by CPMA, on behalf of Haldia Petrochemicals Limited (hereinafter referred to as "HPL") and HPCL-Mittal Energy Limited ((hereinafter referred to as "HMEL"), hereinafter collectively referred to as the "applicant producers". The application has also been supported by Reliance Industries Limited. The applicant producers have not imported the subject goods from the subject countries during the POI.
8. On the basis of the information available on record, the Authority has satisfied itself that the applicant producers constitute domestic industry in terms of Rule 2(b) of AD Rules, 1995. Further, the application also satisfies the requirements of standing in terms of Rule 5(3) of AD Rules, 1995.

#### **D. SUBJECT COUNTRIES**

9. The subject countries in the present investigation are the State of Kuwait (hereinafter referred to as "Kuwait"), Malaysia, the Sultanate of Oman (hereinafter referred to as "Oman"), the State of Qatar (hereinafter referred to as "Qatar"), the Kingdom of Saudi Arabia (hereinafter referred to as "Saudi Arabia") and the United Arab Emirates (hereinafter referred to as "UAE").

#### **E. PERIOD OF INVESTIGATION ("POI")**

10. The period of investigation (POI) for the present investigation is 1<sup>st</sup> January 2024 to 31<sup>st</sup> December 2024 (12 months). The injury period for the investigation will cover the periods FY 2021-22, FY 2022-23, FY 2023-2024 and the period of investigation.

#### **F. BASIS OF DUMPING**

#### **i. Normal value**

11. The Applicant Association has stated in its application that it made attempts to obtain the prevailing price of subject goods in the subject countries as well as details of price of exports of subject goods from the subject countries. However, the Applicant association was not able to find any credible source of information to establish such prices. Further, the applicant association has also claimed that export prices from the subject countries to third countries are likely to be dumped prices on account of aggressive export market targeting by producers based in the subject countries.
12. The Applicant Association has stated that as normal value cannot be determined on the basis of methods mentioned above, the applicant has proposed to construct the normal value in terms of Explanation (ii) (b) of Section 9.A of the Customs Tariff Act, 1975, that is, on the basis of cost of production of the subject goods considering the international price of major raw material (ethylene) and remaining cost estimates based on the domestic industry's data. However, evidence pertaining to the international prices of major raw material could not be verified at this stage. Accordingly, normal value has been constructed based on the best estimates of the cost of production of domestic industry duly adjusted with selling, general and administrative expenses, along with a reasonable profit margin.

#### **ii. Export Price**

13. The applicant association has claimed CIF export price based on market intelligence. The Authority has considered import price based on DG Systems data. Adjustments on account of freight, insurance, commission, port expenses and bank charges were made to arrive at ex-factory export price.

#### **iii. Dumping margin**

14. Upon comparison of normal value and the export price at ex-factory level it is *prima facie* noted that the weighted average dumping margin is above *de minimis* level and is also significant. There is *prima facie* evidence that the product under consideration is being dumped into the Indian market by the exporters from the subject countries.

#### **G. Injury and Causal link**

15. The volume of imports from the subject countries have increased in absolute as well as relative terms in the POI. Although the market share of the domestic industry has increased in the POI compared to the base year, the Applicant Association has explained that the same was on account of commencement of production by HMEL in August 2023, because of which volumetric parameters show improvement.. Further, subject goods from the subject countries have suppressed the prices of the domestic industry. The decline in profitability parameters have intensified during the POI. Thus, there is sufficient *prima facie* evidence regarding injury to the domestic industry due to dumped imports of subject goods from the subject countries.

## **H. INITIATION OF ANTI-DUMPING INVESTIGATION**

16. The subject countries were intimated prior to the initiation of the investigation in terms of Rule 5(5) of AD Rules, 1995. Pursuant to the request for pre- initiation consultation received from the Government of UAE under para 3 of Article 7.2 of India-UAE Comprehensive Economic Partnership Agreement, a consultation was conducted with UAE on 29.06.2025 at 12 noon. Subsequent to the consultation, they furnished their written comments and requested not to make UAE a subject country in this investigation. But prima-facie evidence shows dumping, and material injury to the domestic industry in POI, and therefore, UAE is being considered as one of the subject countries in this investigation. However, the issues raised by them shall be examined during the course of investigation.
17. On the basis of the duly substantiated written application submitted by the applicant, and having reached satisfaction based on prima facie evidence submitted by the applicant concerning dumping of the product under consideration originating in or exported from the subject countries, the consequential injury to the domestic industry and causal link between such injury and the dumped imports, and in accordance with Section 9A of the Act read with Rule 5 of the AD Rules, 1995 the Authority, hereby, initiates an anti-dumping investigation to determine the existence, degree and effect of the dumping with respect to the product under consideration originating in or exported from the subject countries and to recommend the appropriate amount of the anti-dumping duty, which if levied, would be adequate to remove the injury to the domestic industry.

## **I. PROCEDURE**

18. The provisions of Rules 6 of the AD Rules, 1995 shall be followed in this investigation.

## **J. SUBMISSION OF INFORMATION**

19. All communication should be sent to the Designated Authority via email at email addresses [jd15-dgtr@gov.in](mailto:jd15-dgtr@gov.in) and [dd16-dgtr@gov.in](mailto:dd16-dgtr@gov.in) with a copy to [adv13-dgtr@gov.in](mailto:adv13-dgtr@gov.in) and [consultant-dgtr@nic.in](mailto:consultant-dgtr@nic.in) . It must be ensured that the narrative part of the submission is in searchable PDF/MS-Word format and data files are in MS-Excel format.
20. The known producers/exporters in the subject countries, the Governments of the subject countries through their Embassies in India, the importers and users in India who are known to be associated with the subject goods are being informed separately to enable them to file all the relevant information within the time limits mentioned in this initiation notification. All such information must be filed in the form and manner as prescribed in this initiation notification, the AD Rules, 1995 and the applicable trade notices issued by the Authority.
21. Any other interested party may also make submission relevant to the present investigation in the form and manner as prescribed in this initiation notification, the AD Rules, 1995 and the applicable trade notices issued by the Authority within the time limits in this initiation notification.

22. Any party making any confidential submission before the Authority is required to make a non-confidential version of the same available to the other interested parties.
23. Interested parties are further directed to regularly visit the official website of the Directorate General of Trade Remedies (<https://www.dgtr.gov.in/>) to stay updated and apprised with the information as well as the further process related to the investigation.

#### **K. TIME LIMIT**

24. Any information relating to the present investigation should be sent to the Authority via email at email address [jd15-dgtr@gov.in](mailto:jd15-dgtr@gov.in) and [dd16-dgtr@gov.in](mailto:dd16-dgtr@gov.in) with a copy to [adv13-dgtr@gov.in](mailto:adv13-dgtr@gov.in) and [consultant-dgtr@nic.in](mailto:consultant-dgtr@nic.in) within 30 days from the date on which the non-confidential version of the application filed by the domestic industry would be circulated by the Authority or transmitted to the appropriate diplomatic representative of the exporting countries as per Rule 6(4) of the AD Rules, 1995. If no information is received within the stipulated time limit or the information received is incomplete, the Authority may record its findings based on the facts available on record and in accordance with the AD Rules, 1995.
25. All the interested parties are hereby advised to communicate their interest (including the nature of interest) in the instant matter and file their questionnaire responses within the time limit as stipulated in this notification.
26. Where an interested party seeks additional time for filing of submissions, it must mention sufficient cause for such extension in terms of Rule 6 (4) of the AD Rules, 1995 and such request must come within the time stipulated in this initiation notification.

#### **L. SUBMISSION OF INFORMATION ON CONFIDENTIAL BASIS**

27. Where any party to the present investigation makes confidential submissions or provides information on a confidential basis before the Authority, it is required to simultaneously submit a non-confidential version of such information in terms of Rule 7(2) of the AD Rules, 1995 and in accordance with the relevant trade notices issued by the Authority in this regard.
28. Such submissions must be clearly marked as “confidential” or “non-confidential” at the top of each page. Any submission which has been made to the Authority without such markings shall be treated as “non-confidential” information by the Authority, and the Authority shall be at liberty to allow other interested parties to inspect such submissions.
29. The non-confidential version of the information filed by the interested parties should essentially be a replica of the confidential version with the confidential information preferably indexed or blanked out (where indexation is not possible) and such information must be appropriately and adequately summarized depending upon the information on which confidentiality is claimed.
30. The confidential version shall contain all information which is by nature confidential and/ or other information which the supplier of such information claims as confidential. For information which is claimed to be confidential by the nature or the information on which confidentiality is claimed because of other reasons, the supplier of the information is required to provide a good cause statement along with the supplied information as to why such information cannot be disclosed.

31. The Authority may accept or reject the request for confidentiality on examination of the nature of the information submitted. If the Authority is satisfied that the request for confidentiality is not warranted or if the supplier of the information is either unwilling to make the information public or to authorize its disclosure in generalized or summary form, it may disregard such information.
32. The non-confidential summary must be in sufficient detail to permit a reasonable understanding of the substance of the information furnished on confidential basis. However, in exceptional circumstances, the party submitting the confidential information may indicate that such information is not susceptible to summary, and a statement of reasons containing a sufficient and adequate explanation in terms of Rule 7 of the AD Rules, 1995 and appropriate trade notices issued by the Authority, as to why such summarization is not possible, must be provided to the satisfaction of the Authority.
33. The interested parties can offer their comments on the issues of confidentiality claimed by the domestic industry within 7 days of the receipt of the non-confidential version of the application.
34. Any submission made without a meaningful non-confidential version thereof or without a sufficient and adequate cause statement in terms of Rule 7 of the AD Rules, 1995 and appropriate trade notices issued by the Authority, on the confidentiality claim shall not be taken on record by the Authority.

#### **M. INSPECTION OF PUBLIC FILE**

35. A list of registered interested parties will be uploaded on the DGTR's website along with the request therein to all of them to email the non-confidential version of their submissions to all other interested parties. Failure to circulate non-confidential version of submissions/response/ information might lead to consideration of an interested party as non-cooperative.

#### **N. NON-COOPERATION**

36. In case any interested party refuses access to and otherwise does not provide necessary information within a reasonable period or within the time stipulated by the Authority in this initiation notification, or significantly impedes the investigation, the Authority may declare such interested party as non-cooperative and record its findings based on the facts available and make such recommendations to the Central Government as deemed fit.



**(Siddharth Mahajan)**  
**Designated Authority**