

F. No. 06/20/2025-DGTR
Government of India
Ministry of Commerce & Industry
Department of Commerce
(Directorate General of Trade Remedies)
4th Floor, Jeevan Tara Building,
5, Parliament Street, New Delhi -110001

Date: 30th June, 2025

INITIATION NOTIFICATION

Case No. AD (OI) - 17/2025

Subject: Initiation of anti-dumping investigation into imports of Virgin Multi-layer Paperboard from Indonesia.

F. No. 06/20/2025-DGTR. The Indian Paper Manufacturer Association (hereinafter also referred to as the “applicant” or “IPMA”) has filed an application on behalf of the domestic industry before the Designated Authority (hereinafter referred to as the “Authority”), in accordance with the Custom Tariff Act 1975, as amended, (hereinafter referred to as the “Act”) and Custom Tariff (Identification, Assessment and Collection of Anti-dumping Duty on Dumped Articles and for Determination of Injury) Rules, 1995 as amended, (hereinafter also referred to as the “AD Rules”), for the initiation of an anti-dumping investigation concerning imports of Virgin Multi-layer Paperboard (hereinafter referred to as “subject goods” or “product under consideration”) originating in or exported from Indonesia (hereinafter referred to as “subject country”).

The applicant has alleged that material injury is being caused to the domestic industry due to dumped imports of the product under consideration originating in or exported from the subject country and has requested for imposition of anti-dumping duty on the imports of the product under consideration from the subject country.

A. PRODUCT UNDER CONSIDERATION

1. The product under consideration is multi-layer board made of white / virgin wood pulp, whether coated or uncoated, and is also known as Virgin Multi-Layer Paperboard. The product under consideration is made up of multiple layers of paper bonded together. The product under consideration is made of pulp from fibre of trees. The product under consideration comes in various grades. The product under consideration includes Folding Box Board (FBB), Solid Bleached Sulfate Board (SBS), Cup Stock Paper or Board and Liquid Packaging Board, all in the range of 140 to 450 GSM. These are classified into two main categories, virgin grade which is manufactured from fibre of the trees and recycled grade manufactured from fibres obtained from recovered paper and paperboard.

Coated/uncoated cigarette boards and paperboards made out of recycled/brown pulp or fibre are excluded from the scope of the product under consideration.

2. The product under consideration is used in packaging of pharmaceuticals, FMCG products, food & beverages, electronics, high end cosmetics, and liquor, and in book covers, publishing, etc.
3. Solid Bleached Sulfate Board (SBS) paperboard is a high-quality paperboard made from bleached virgin pulp, which is coated with clay and thereafter treated to ensure resistance to moisture. Folding Box Board (FBB) is made up of an inner layer of mechanical pulp in between outer layers of chemical pulp. Folding Box Board includes a bleached top layer for providing an effective printing surface, for use as brochures, flyers and display boxes. Cup stock grade is used to manufacture disposable cups and cup shaped containers for food items. The usage of the subject goods often requires compliance to relevant safety regulations.
4. The product under consideration is classified under Chapter 48 of the Customs Tariff Act, 1975, under the heading 4805 and 4810, under the ITC HS Codes 4805 91 00, 4805 92 00, 4805 93 00, 4810 92 00 and 4810 99 00. The applicant has claimed that the subject goods are being imported under multiple HS Codes including 4802 20 90, 4802 57 90, 4804 19 00, 4804 39 00, 4804 42 00, 4804 52 00, 4804 59 00, 4805 19 00, 4810 13 20, 4810 13 30, 4810 13 90, 4810 14 30, 4810 14 90, 4810 19 10, 4810 19 90, 4810 22 00, 4810 29 00, 4810 31 00, 4810 32 00, 4810 39 90, 4811 51 10, 4811 51 90, 4811 59 10, 4811 59 90, 4811 90 99, 4819 10 10, 4819 20 90. The Customs classification is only indicative and is not binding on the scope of the present investigation.
5. The domestic industry has proposed the following PCN.

SN	Product Type	Code
1.	Solid Bleached Sulfate Board	SBS
2.	Two-side coated boards / Artboard	ATB
3.	Folding Box Board	FBB
4.	Cup Stock	CUS
5.	Liquid Packaging Board	LPB
6.	Others	OTH

6. The parties to the present investigation may provide their comments on the PUC and proposed PCNs, if any, within 15 days from the date of initiation of this investigation.

B. LIKE ARTICLE

7. The subject goods exported from the subject country are identical to the goods produced by the domestic industry. The subject goods produced by the domestic industry have

comparable characteristics to the subject goods imported from the subject country in terms of technical specifications, physical & chemical characteristics, manufacturing process & technology, functions & uses, pricing, distribution & marketing and tariff classification. The two are technically and commercially substitutable. Therefore, for the purpose of initiation of the present investigation, the subject goods produced by the applicant domestic producers are being treated as 'like article' to the subject goods originating in or exported from the subject country.

C. DOMESTIC INDUSTRY AND STANDING

8. The application has been filed by the Indian Paper Manufacturing Association on behalf of the domestic industry. The following domestic producers of the subject goods in India have provided information as part of the application requesting initiation of the present investigation.
 - a. Emami Papers Mills Limited
 - b. ITC Limited
 - c. JK Paper Limited
9. Subsequently, the following domestic produces submitted complete injury and costing information for the present investigation. The said domestic producers requested for being considered as part of the domestic industry.
 - a. Aditya Birla Real Estate Limited
 - b. Tamil Nadu Newsprint and Papers Limited
10. Apart from the applicant domestic producers, West Coast Paper Mills Limited is another domestic producer which has filed a letter supporting the application.
11. Based on the information provided by the domestic producers, the following have been considered to form the domestic industry (hereinafter referred to as "applicant domestic producers").
 - a. Emami Papers Mills Limited
 - b. ITC Limited
 - c. JK Paper Limited
 - d. Aditya Birla Real Estate Limited
 - e. Tamil Nadu Newsprint and Papers Limited
12. It has been submitted that the applicant domestic producers are not related to exporters of subject goods in subject country or importers of product under consideration in India. Further, it is submitted that they have not imported the product under consideration from the subject country during the period of investigation.
13. In view of the above and after examination of the application filed by the applicant, the Authority prima facie notes that the applicant domestic producers account for major proportion of total Indian production. The applicant domestic producers constitute

'domestic industry' within the meaning of Rule 2(b) and the application satisfies the criteria of standing in terms of Rule 5(3) of the Anti-Dumping Rules.

D. SUBJECT COUNTRY

14. The application has been filed in respect of dumped imports of the product under consideration from the Republic of Indonesia ("Indonesia").

E. PERIOD OF INVESTIGATION

15. The applicant has proposed 1st April 2024 to 31st December 2024 as the period of investigation. However, the Authority has considered the period of investigation (POI) for the present investigation from 1st April 2024 to 31st March 2025 (a period of 12 months). The injury investigation period shall cover the period 2021-22, 2022-23, 2023-24 and the period of investigation.

F. BASIS OF ALLEGED DUMPING

Normal value

16. The applicant has claimed that it did not have access to information regarding the domestic selling price prevailing in Indonesia. Since there is no dedicated tariff classification for the product, the applicant could not rely upon price of imports into the subject country or exports from the subject country. Further, information with regard to cost of production in the subject country was not available to the domestic industry.
17. For the purpose of initiation, the Authority has considered normal value for Indonesia, estimated based on cost of production of the applicant domestic producers, duly adjusted for selling, general and administrative expenses along with a reasonable profit margin. The normal value methodology claimed by the applicant has been considered for the purpose of initiation.

Export Price

18. The export price of the subject goods from the subject country has been determined by considering transaction wise import data, as reflected in the DG Systems Data. Price adjustments have been made on account of ocean freight, marine insurance, commission, bank charges, port and handling expenses, and inland freight.

Dumping margin

19. The normal value and the export price have been compared at the ex-factory level, which *prima facie* establishes that the dumping margin is above the *de-minimis* level with respect to the subject goods imported from Indonesia. Thus, there is sufficient *prima*

facie evidence that the product under consideration from Indonesia is being dumped in the domestic market of India by the exporters from the subject country.

G. INJURY AND CAUSAL LINK

20. Information furnished by the applicant, with regard to various parameters, has been considered for assessment of injury to the domestic industry. The applicant has provided *prima facie* information with respect to the injury suffered by the domestic industry because of dumped imports. There has been a significant increase in imports from the subject country in absolute and relative terms. The applicant has claimed that the imports have suppressed and depressed the prices of the domestic industry. The subject imports have entered at prices below the cost of sales and selling price of the domestic industry. This has adversely impacted the performance of the domestic industry in respect of profitability. The profits and cash profits of the domestic industry have declined significantly over the injury period and it has earned a low return on capital employed. The market share of the subject imports has increased and that of the domestic industry has declined... There is sufficient *prima facie* evidence of material injury being caused to the domestic industry by the dumped imports from the subject country, justifying initiation of an anti-dumping investigation.

H. INITIATION OF ANTI-DUMPING INVESTIGATION

21. On the basis of the duly substantiated application filed by the applicant and on being satisfied based on the *prima facie* evidence submitted therein, concerning the dumping of the subject goods originating in or exported from the subject country, the consequential injury to the domestic industry as a result of the alleged dumping of the subject goods and the causal link between such injury and the dumped imports, and in accordance with Section 9A of the Act read with Rule 5 of the Anti-Dumping Rules, 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 country and to recommend the appropriate amount of anti-dumping duty, which if levied, would be adequate to remove the injury to the domestic industry.

I. PROCEDURE

22. Principles as given in Rule 6 of the Rules shall be followed for the present investigation.

J. SUBMISSION OF INFORMATION

23. All communication should be sent to the Designated Authority via email at email addresses jd12-dgtr@gov.in and ad12-dgtr@gov.in with a copy to dir15-dgtr@gov.in and 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.

24. The known producers/exporters in the subject country, the Government of the subject country through its embassies in India, and 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 relevant information within the time limits mentioned in this initiation notification. All such information must be filed in the form and manner as prescribed by this initiation notification, the Rules, and the applicable trade notices issued by the Authority.
25. Any other interested party may also make a submission relevant to the present investigation in the form and manner as prescribed by this initiation notification, the Rules, and the applicable trade notices issued by the Authority within the time limits mentioned in this initiation notification.
26. 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.
27. Interested parties are further advised to keep a regular watch on the official website of the Authority <http://www.dgtr.gov.in/> for any updated information with respect to this investigation.

K. TIME LIMIT

28. Any information relating to the present investigation should be sent to the Designated Authority via email at email address jd12-dgtr@gov.in and ad12-dgtr@gov.in with a copy to dir15-dgtr@gov.in and consultant-dgtr@nic.in within thirty days (30 days) from the date on which the non-confidential version of the documents filed by the domestic industry would be circulated by the Designated Authority or transmitted to the appropriate diplomatic representative of the exporting country as per Rule 6(4) of the Rules. 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 Rules.
29. All the interested parties are hereby advised to intimate their interest (including the nature of interest) in the present investigation and file their questionnaire response/submissions within the above time limit.
30. Where an interested party seeks additional time for filing of submissions, it must demonstrate sufficient cause for such extension in terms of Rule 6(4) of the AD Rules and such request must come within the time stipulated in this notification.

L. SUBMISSION OF INFORMATION ON CONFIDENTIAL BASIS

31. Where any party to the present investigation makes confidential submissions or provides information on a confidential basis before the Authority, such party is required to

simultaneously submit a non-confidential version of such information in terms of Rule 7(2) of the Rules and in accordance with the relevant trade notices issued by the Authority in this regard.

32. Such submissions must be clearly marked as “confidential” or “non-confidential” at the top of each page. Any submission that 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.
33. 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 the information which is claimed to be confidential by nature, or the information on which confidentiality is claimed because of other reasons, the supplier of the information is required to show a good cause along with the supplied information as to why such information cannot be disclosed.
34. The non-confidential version of the information filed by the interested parties should 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.
35. The non-confidential summary must be in sufficient detail to permit a reasonable understanding of the substance of the information furnished on a 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 Anti-Dumping Rules, 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.
36. The interested parties can offer their comments on the issues of confidentiality claimed in the submissions, within seven days (7 days) from the date of circulation of the non-confidential version of the documents in terms of relevant paragraph of this initiation notification.
37. Any submission made without a meaningful non-confidential version thereof or a sufficient and adequate cause statement in terms of Rule 7 of the Rules, and appropriate trade notices issued by the Authority, on the confidentiality claim shall not be taken on record by the Authority.
38. The Authority may accept or reject the request for confidentiality on examination of the nature of the information submitted. If the Authority is not satisfied that the request for confidentiality is 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.

39. The Authority on being satisfied and accepting the need for confidentiality of the information provided, shall not disclose it to any party without specific authorization of the party providing such information.

M. INSPECTION OF PUBLIC FILE

40. 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/response/information 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

41. In case where an interested party refuses access to, or 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 on the basis of the facts available and make such recommendations to the Central Government as deemed fit.



(Siddharth Mahajan)
Designated Authority