

To be published in Part-1 Section-1 of the Gazette of India Extraordinary

F. No. 06/46/2025-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

Dated: 26th September 2025

INITIATION NOTIFICATION

Case No. AD (OI): 41/2025

Subject: Initiation of anti-dumping investigation concerning imports of “Printed Circuit Board Tools” originating in or exported from China PR.

1. **F. No. 06/46/2025-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 thereof, as amended from time to time (hereinafter also referred to as the “**Rules**” or the “**AD Rules**”), Ind-Sphinx Precision Limited (hereinafter also referred to as the “**applicant**” or “**domestic industry**”) has filed an application before the Designated Authority (hereinafter also referred to as the “**Authority**”), for initiation of an antidumping investigation on imports of “Printed Circuit Board Tools” (hereinafter also referred to as the “**product under consideration**” or “**PUC**” or “**subject goods**”) originating in or exported from China PR (hereinafter also referred to as the “**subject country**”).
2. The applicant has alleged that the subject goods are being imported into India from the subject country at dumped prices and causing material injury. Accordingly, the applicant has requested for imposition of anti-dumping duty on the import of the subject goods originating in or exported from the subject country.

A. PRODUCT UNDER CONSIDERATION

3. The product under consideration in the present application is “**Printed Circuit Board (“PCB”) tools**” namely PCB drill and PCB router. PCB drill and PCB router are also known as PCB drill bits and PCB router bits respectively.

4. The PUC is limited to PCB drill and PCB router with a shank diameter of standardized size of 3.175 mm. The term shank diameter refers to the thickness of the cylindrical portion of the tool. The shank portion of the tool is clamped to the machining apparatus, ensuring compatibility with standard collets and spindles used in PCB manufacturing equipment.
5. PCB drills and PCB routers are precision tools integral to PCB fabrication, serving distinct but complementary purposes. PCB drills are specifically engineered to create holes that enable both mechanical and electrical interconnections across multiple PCB layers, thereby supporting through-hole component installation for robust fixation and establishing conductive pathways between copper layers via plated vias. Drill sizes generally range from 0.20 mm to 7.50 mm in diameter, with flute profile defined by the configuration and number of grooves or flutes playing a vital role in chip evacuation and heat dissipation. Depending on requirements, drills may feature single-flute, double-flute, or hybrid flute geometries, with or without under-cut, to optimize hole accuracy, minimize breakage, and improve wall quality, with selection based on board stack-up thickness, material properties, and tolerance requirements for plated through holes (“**PTH**”) and non-plated through holes (“**NPTH**”).
6. PCB routers are used to shape the PCB substrate by cutting slots or defining the board outline without creating through-holes, their functions including defining the PCB’s external profile with clean edges and creating internal cut-outs, slots, and pathways for assembly. Router bits typically range from 0.50 mm to 3.175 mm in diameter, with the choice of bit size depending on board thickness, outline complexity, and navigational tolerances. The number and geometry of flutes on router bits, typically varying between 1 and 8, are tailored to the material type and routing application, while flute geometry such as helix angle, pitch, and profile directly affects heat buildup, swarf management, and edge finish quality, with design variations like up cut, down cut, chip breaker, diamond cut, single flute, and two flute selected to meet specific routing goals.
7. The PUC is classifiable under Chapter 82 titled “*Tools, implements, cutlery, spoons and forks, of base metal; parts thereof of base metal*”, under tariff items 82075000, 82077090 and 82079090 of the first schedule to the Customs Tariff Act, 1975. The custom classification is only indicative and is not binding on the scope of the present investigation.

PRODUCT CONTROL NUMBER (“PCN”)

8. The applicant in the application have proposed PCNs for making a fair comparison of the imported product with the like article produced by the domestic industry. The PCNs as suggested by the applicant in the application are given below:

Parameter	Type	PCN Code
Type of PCB Tool	PCB Drill	PCB D
	PCB Router	PCB R

9. The parties to the present investigation may provide their comments on the scope of the product under consideration and propose PCNs (with justification), if any, within 15 days of initiation of the investigation.

B. LIKE ARTICLE

10. The applicant has submitted that there are no known differences in the subject goods produced by it and those exported from the subject country, and both are like articles. The product produced by the applicant and those imported from the subject country are comparable in terms of essential product characteristics such as physical characteristics, manufacturing process and technology, functions and uses, product specifications, pricing, distribution and marketing and tariff classification of the goods. The consumers have used and are using the two interchangeably. The Authority notes that the two are technically and commercially substitutable and hence, for the purpose of the present investigation, the subject goods produced by the applicant has been *prima facie* considered as like article to the product being imported from the subject country.

C. DOMESTIC INDUSTRY AND STANDING

11. The present application has been filed by Ind-Sphinx Precision Limited. The applicant has claimed that there is one more producer of the PUC in India, namely CTC India Pvt. Ltd. (“CTC”). The applicant has claimed that CTC is primarily export oriented and its domestic sales are limited. The applicant has also stated in the application that it has neither imported the subject goods from subject country nor related to any producer/exporter of subject goods in the subject country or importers of the subject goods in India.
12. On the basis of the information available on record, it is noted that the applicant alone constitutes a major share in the total Indian production of PUC and therefore, constitutes 'domestic industry' within the meaning of Rule 2(b) of the AD Rules. Further, the application also satisfies the requirements of standing in terms of Rule 5(3) of the AD Rules.

D. SUBJECT COUNTRY

13. The subject country in the present investigation is China PR.

E. PERIOD OF INVESTIGATION

14. The period of investigation (hereinafter also referred to as the “**POI**”) for the present investigation is 1st April 2024 to 31st March 2025 (period of 12 months). The injury investigation period will cover the periods 1st April 2021 to 31st March 2022, 1st April 2022 to 31st March 2023, 1st April 2023 to 31st March 2024 and the POI.

F. BASIS OF ALLEGED DUMPING

i. Normal Value

15. The applicant has claimed that that China PR should be treated as a non-market economy and the producers from China PR should be directed to demonstrate that market economy conditions prevail in the industry with regard to the production and sales of the PUC. Unless the producers from China PR show that such market economy conditions prevail, their normal value should be determined in accordance with Para 7 of Annexure I to AD Rules.

16. The applicant has submitted that data relating to cost and price in market economy third country is not available in the public domain and therefore, it has claimed normal value based on best estimates of the cost of production in India duly adjusted with 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.

ii. Export Price

17. The applicant has claimed CIF export price based on market intelligence. However, the Authority has considered import price based on DG Systems data and the price adjustments have been made on account of ocean freight, marine insurance, commission, bank charges, port expenses, inland freight, loading & unloading charges, to determine the ex-factory export price.

iii. Dumping Margin

18. 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 product under consideration imported from the subject country. Thus, there is sufficient *prima facie* evidence that the product under consideration from the subject country is being dumped in India by the exporters from the subject country.

G. INJURY AND CAUSAL LINK

19. Information furnished by the applicant has been considered for assessment of injury to the applicant on account of dumped imports of the subject goods from the subject country. The imports from subject country have been significant in the entire injury period and have increased in the POI as compared to base year. The imports relative to total Indian demand declined marginally in the POI, whereas the relative share of imports in total Indian production has increased in the POI compared to base year. Despite the domestic industry possessing capacity to meet majority of Indian demand, its market share remained persistently low throughout the injury period. The domestic industry has been unable to utilize the plant at optimum levels due to dumped imports from China PR. The domestic industry has been incurring losses in the injury period except for the base year. The imports from China PR were priced significantly below the domestic industry's prices, resulting in substantial price undercutting and price underselling. There is sufficient *prima facie* evidence that the domestic industry has suffered material injury due to dumped imports from the subject country to justify the initiation of the anti-dumping investigation.

H. INITIATION OF ANTI-DUMPING INVESTIGATION

20. On the basis of the duly substantiated written application filed by the applicant, and having satisfied itself, on the basis on the *prima facie* evidence submitted by the applicant, concerning the dumping of the PUC originating in or exported from the subject country, the consequential injury to the domestic industry as a result of the alleged dumping of the PUC 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 AD Rules, the Authority, hereby, initiates an anti-dumping investigation to determine the existence, degree, and effect of the dumping with respect to the PUC originating in or exported from 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

21. The provisions stipulated in Rule 6 of AD Rules shall be followed in this investigation.

J. SUBMISSION OF INFORMATION

22. All communication should be sent to the Authority via email at the email addresses jd15-dgtr@gov.in, dd16-dgtr@gov.in, adv13-dgtr@gov.in and consultant-dgtr@govcontractor.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.

23. The known producers/exporters in the subject country, the government of the subject country through their embassy in India, the importers and users in India known to be concerned 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 by this initiation notification, the Rules, and the applicable trade notices issued by the Authority.
24. Any other interested party may also make its submissions relevant to the investigation in the form and manner prescribed within the time limit set out below on the email addresses mentioned hereinabove.
25. 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.
26. Interested parties are further advised to regularly visit the official website of the Directorate General of Trade Remedies (<https://www.dgtr.gov.in/>) for any updated information as well as further processes related to the investigation.

K. TIME LIMIT

27. Any information relating to the present investigation should be sent to the Authority via email at the email addresses jd15-dgtr@gov.in, dd16-dgtr@gov.in, adv13-dgtr@gov.in and consultant-dgtr@govcontractor.in within 30 days from the date on which the non-confidential version of the application filed by or on behalf of the domestic industry would be circulated by the Authority or transmitted to the appropriate diplomatic representative of the exporting country as per Rule 6(4) of AD 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 AD Rules.
28. All the interested parties are hereby advised to intimate their interest (including the nature of interest) in the instant matter and file their questionnaire responses within the above time limit as stipulated in this notification.
29. 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 AD Rules and such request must come within the time stipulated in this notification.

L. SUBMISSION OF INFORMATION ON CONFIDENTIAL BASIS

30. Where any party makes any 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. Failure to adhere to the same may lead to rejection of the response / submissions.
31. 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.
32. 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 provide a good cause statement along with the supplied information as to why such information cannot be disclosed.
33. 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 summarized depending upon the information on which confidentiality is claimed.
34. 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 as to why such summarization is not possible, must be provided to the satisfaction of the Authority.
35. The interested parties can offer their comments on the issues of confidentiality claimed by the interested parties within 7 days from the date of circulation of the non-confidential version of the submission.
36. 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.

37. 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 authorise its disclosure in generalised or summary form, it may disregard such information.

M. INSPECTION OF PUBLIC FILE

38. 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 might lead to consideration of an interested part as non-cooperative.

N. NON-COOPERATION

39. 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 it deems fit.



(Siddharth Mahajan)
Designated Authority