

No. 6/34/2025-DGTR
Government of India
Department of Commerce
Ministry of Commerce & Industry
(Directorate General of Trade Remedies)
4th Floor, Jeevan Tara Building, 5, Parliament Street, New Delhi – 110001

Date: 24th September. 2025

INITIATION NOTIFICATION

Case No- AD(OI)- 31/2025

Subject: Initiation of anti-dumping investigation concerning imports of Hydrofluorocarbon (HFC) Component R-125 from China PR.

1. 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 AD Rules”), SRF Limited and Gujarat Fluorochemicals Limited (hereinafter referred to as the “applicants” or the “domestic industry”) have filed an application before the Designated Authority (hereinafter referred to as the “Authority”) for initiation of an anti-dumping investigation concerning imports of ‘Hydrofluorocarbon (HFC) Component R-125’ (hereinafter referred to as the “subject goods” or “product under consideration”) from China PR (“subject country”).
 2. The applicants have alleged that material injury is being caused due to the dumped imports of the subject goods from the subject country and have requested for the imposition of anti-dumping duties on the imports of the subject goods, originating in or exported from the subject country.
- A. Product under consideration**
3. The product under consideration (PUC) in the present application is “Hydrofluorocarbon (HFC) Component R-125”, also known as “HFC-125”, “R-125” and “Pentafluoroethane” (hereafter referred to as “product under consideration” or “R-125”). Its molecular formula is C₂HF₅ and structural formula is CF₃CF₂H. The product is found in gaseous form.
 4. The product under consideration is primarily used to manufacture HFC blends, notable R-410 and R-407. Once blended, the HFC blend containing R-125 is used in residential

and commercial refrigerant and cooling applications. The product under consideration has standalone applications also as a clean agent in extinguishing fires.

5. The product under consideration was earlier imported under Chapter 29 of the Customs Tariff Act, 1975, under subheadings 2903 39 19, 2903 42 00 and 2903 44 00. The applicants have claimed that the tariff classification has undergone a change from March 2022 to subheading 3827 63 00.
6. The applicants have proposed the following PCN for the product under consideration.

SN	Particulars
1	HFC-125 Packed
2	HFC-125 Unpacked

7. The interested parties in the subject investigation may provide their comments on the PUC/PCN methodology, if any, within 15 days from the date of initiation of this investigation.

B. Like article

8. The applicants have submitted that there are no significant differences in the product produced by the applicants and those exported from the subject country, and both are like articles. The product produced by the applicants and those imported from the subject country are comparable in terms of essential product characteristics such as physical and chemical characteristics, manufacturing process & technology, functions & usage, product specifications, pricing, distribution & marketing and tariff classification of the goods. Consumers can use and have been using the two interchangeably. The two are technically and commercially substitutable, and hence, should be treated as 'like article' under the Rules. Thus, for the purposes of initiation of the present investigation, the product produced by the applicants has been *prima facie* considered as like article to the product being imported from the subject country.

C. Domestic industry and standing

9. The application has been filed by SRF Limited and Gujarat Fluorochemicals Limited.
10. The applicants have certified that they are not related to any producer or exporter of the subject goods in the subject country or an importer in India either directly or indirectly within the meaning of Rule 2(b) the Rules. The applicants have not imported the product under consideration.
11. The production of the applicants account for a major proportion in the domestic production of the like article in India.

12. Based on the information provided, it is seen that the applicants constitute 'domestic industry' within the meaning of Rule 2(b) of the Rules, and the application satisfies the criteria of standing in terms of Rule 5(3) of the Rules.

D. Subject country

13. The subject country for the present anti-dumping investigation is China PR.

E. Period of investigation

14. The period of investigation for the present investigation is 1st April 2024 – 31st March 2025 (a period of 12 months). The injury investigation period will cover the period of 2021-22, 2022-23 and 2023-24 and the period of investigation.

F. Basis of alleged dumping

i. Normal value

15. The applicants have cited and relied upon Article 15(a)(i) of China's Accession Protocol and has claimed that China PR should be treated as a non-market economy and that 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 product under consideration. Unless the producers from China PR show that such market economy conditions prevail, their normal value should be determined in accordance with Para 7 and 8 of Annexure-I to the Anti-Dumping Rules, 1995.
16. The applicants have submitted that data relating to cost and price in market economy third country is not available. With regards to the price at which the product under consideration has been sold from the market economy third country to any other country, including India, the applicants submitted that the import volume from other countries is not sufficient in volume to be considered as a basis for normal value. Therefore, the applicants have determined normal value for product under consideration based on cost of production in India, adjusted to include a reasonable profit margin.
17. For the purpose of initiation, the normal value for the product under consideration has been determined based on cost of production in India, duly adjusted for addition of selling, general and administrative expenses and reasonable profits.

ii. Export price

18. The export price of the product under consideration has been determined by considering the CIF price of the product under consideration as reported in DG Systems data. Adjustments have been claimed for ocean freight, marine insurance, commission, bank charges, port expenses, inland freight expenses, credit cost and inventory carrying cost.

iii. 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 with respect to the product under consideration imported from the subject country is not only above the *de minimis* level but is also significant. Thus, there is sufficient *prima facie* evidence that the product under consideration is being dumped in the domestic market of India by the exporters from the subject country.

G. Evidence of injury and causal link

20. Information furnished by the applicants has been considered for assessment of injury to the domestic industry. The applicants have furnished *prima facie* evidence with respect to the injury suffered because of the alleged dumped imports. The information concerning imports and economic parameters of the domestic industry over the injury period show that the imports have increased. There is positive price undercutting and price depression effect on the prices of the applicants. The applicants have incurred decline in its profitability and return on capital employed. There is sufficient *prima facie* evidence of injury being caused to the domestic industry by dumped imports of subject goods from the subject country.

H. Initiation of anti-dumping investigation

21. On the basis of the duly substantiated written application submitted by the applicants and having reached satisfaction based on the *prima facie* evidence submitted by the applicants concerning the dumping of the product under consideration originating in or exported from the subject country, the consequential injury to the domestic industry as a result of the alleged dumping of the product under consideration 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 product under consideration 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

22. The provisions stipulated in Rule 6 of the Anti-Dumping Rules shall be followed in this 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 subject country, the government of subject country through its Embassy in India, and the importers and users in India who are known to be associated with the product under consideration 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.
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 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 further processes related to the investigation.

K. Time limit

28. Any information relating to the present investigation should be sent to the Designated Authority via email at the following email addresses jd12-dgtr@gov.in and ad12-dgtr@gov.in with a copy to dir15-dgtr@gov.in and consultant-dgtr@nic.in. within 30 days from the date on which the non-confidential version of the documents filed by the applicants 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 instant matter and file their questionnaire responses within the above time limit as stipulated in this notification.
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, 1995 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 provide a good cause statement 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 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.
36. The interested parties can offer their comments on the issues of confidentiality within 7 days from the date of circulation of the non-confidential version of the documents.
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 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.

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 authorisation of the party providing such information.

M. Inspection of public file

40. A list of registered interested parties will be uploaded on the DGTR website with a request to all interested parties to send the non-confidential version of their submissions to all other interested parties by email. Failure to circulate the non-confidential version of the submissions/replies/information may result in an interested party being considered non-cooperative.

N. Non-cooperation

41. 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**