

**F. No. No. 6/40/2025-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: 29.09.2025**

**INITIATION NOTIFICATION**  
**CASE No. AD (OI) – 35/2025**

**Subject: Initiation of anti-dumping investigation concerning imports of Melamine from China PR.**

1. **F. No. No. 6/40/2025-DGTR:** Having regards to the Customs Tariff Act, 1975 as amended from time to time (hereinafter referred 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 referred to as the 'Rules'), Gujrat State Fertilisers and Chemicals Limited (hereinafter referred to as the 'applicant') has filed an application before the Designated Authority (hereinafter referred to as the 'Authority'), for initiation of an anti-dumping investigation on imports of "Melamine" (hereinafter referred to as the 'product under consideration' or 'subject goods' or 'PUC') originating in or exported from China PR.
  2. The applicant has alleged that material injury is being caused due to the dumped imports of the subject goods from the subject country and has requested for the imposition of the 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 in the present investigation is "Melamine".
  4. Melamine formaldehyde resins produced using melamine and used for laminates offer good hardness, resistance to scratch, stain, water and heat. Laminates used in some industrial electrical applications possess high mechanical strength, good heat resistance and good electrical insulating properties.
  5. The unit of measurement considered in the present investigation for the product under consideration is Metric Tons (MT).

6. Melamine is classified under Chapter 29 of the Customs Tariff Act, 1975 under sub-heading 2933 61 00. The customs classification is indicative only and is not binding on the scope of the product under consideration.
7. The applicant has not proposed any PCN methodology. The interested parties are advised to furnish their comments/suggestions on the scope of product under consideration and PCN methodology within 15 days from the date of initiation of this investigation.

**B. Like article.**

8. The applicant has claimed that there is no known difference between the subject goods exported from the subject country and that produced by the applicant. Subject goods produced by the applicant and imported from the subject country are comparable in terms of essential product characteristics such as physical & chemical characteristics, manufacturing process & technology, functions & uses, product specifications, pricing, distribution & marketing and tariff classification of the goods. Consumers use the two interchangeably. The applicant has further claimed that the two are technically and commercially substitutable and, hence, should be treated as like article under the Rules. Therefore, for the purpose of the present investigation, the product produced by the applicant is being treated as like article to the product under consideration imported from the subject country.

**C. Domestic industry & standing.**

9. The application has been filed by Gujrat State Fertilisers and Chemicals Limited. The applicant has claimed that they are the sole producer of the subject goods in India. The applicant has further certified that they have not imported the subject goods nor related to any exporters from the subject country or importers in India.
10. In view of the same, and after examination, the Authority is satisfied that the application has been made by the domestic industry and satisfy the requirements of standing in terms of Rule 5(3) of the Rules and the applicant constitutes domestic industry within the meaning of Rule 2(b).

**D. Subject country.**

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

**E. Period of investigation.**

12. The period of investigation (POI) for the investigation is from 1st April 2024 – 31<sup>st</sup> March 2025 (12 months). The injury examination period is April 2021– March 2022, April 2022 – March 2023, April 2023 – March 2024 and the period of investigation.

**F. Basis of alleged dumping.**

**i. Normal value**

13. The applicant has 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.
14. The applicant has submitted that data relating to cost and price in market economy third country is not available. The applicant has determined normal value for product under consideration based on cost of production in India, adjusted to include a reasonable profit margin.
15. 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.**

16. 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 System Transaction wise import data. Adjustments have been claimed for ocean freight, marine insurance, commission, bank charges, port expenses and credit costs.

**iii. Dumping margin.**

17. 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.**

18. The applicant has provided *prima facie* evidence with respect to the injury suffered by the applicant because of dumped imports. The volume of the subject imports from the subject country has increased in absolute terms as well as relative term. The imports from subject country have increased over and above the increase in demand. The price undercutting from the subject country is positive. The price depression caused by the dumped imports have prevented the applicant from increasing its prices to recover the full cost and achieve a reasonable rate of return. The applicant is suffering from financial

losses, negative cash profit and negative PBIT. There is sufficient *prima facie* evidence of material injury being caused to the applicant due to dumped imports from the subject country to justify the initiation of the anti-dumping investigation.

**H. Initiation of anti-dumping investigation.**

19. On the basis of the duly substantiated written application submitted by the applicant and having reached satisfaction based on the *prima facie* evidence submitted by the applicant 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.**

20. The provisions stipulated in Rule 6 of the Anti-Dumping Rules shall be followed in this investigation.

**J. Submission of information.**

21. All communication should be sent to the Designated Authority via email at email addresses [dir16-dgtr@gov.in](mailto:dir16-dgtr@gov.in) and [ad13-dgtr@gov.in](mailto:ad13-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.
22. 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.
23. 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.

24. 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.
25. 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.**

26. Any information relating to the present investigation should be sent to the Designated Authority via email at the following email addresses [dir16-dgtr@gov.in](mailto:dir16-dgtr@gov.in) and [ad13-dgtr@gov.in](mailto:ad13-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 documents filed by the applicant 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.
27. 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.
28. 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.**

29. 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.
30. 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.
31. 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.

32. 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.
33. 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.
34. 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.
35. 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.
36. 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.
37. 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.**

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.

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**