

TO BE PUBLISHED IN THE GAZETTE OF INDIA, Extraordinary, Part-1, Section 1

F. No. 7/01/2026-DGTR
Government of India
Ministry of Commerce & Industry
(Directorate General of Trade Remedies)
4th Floor, Jeevan Tara Building,
5 Parliament Street, New Delhi- 110001

Dated: 10 March 2026

INITIATION NOTIFICATION

(Case No. CVD(AC)- 01/2026)

Subject: Initiation of anti-circumvention investigation regarding countervailing duties imposed on imports of “Saccharin” originating in China PR and exported from Thailand.

F. No. 7/01/2026-DGTR M/s. Swati Petro Products Ltd. (hereinafter referred to as “Swati”) and M/s. Blue Jet Healthcare Ltd. (hereinafter referred to as “Blue Jet”) (hereinafter collectively referred to as the “Applicants”) have filed an application before the Designated Authority (hereinafter referred to as the “Authority”) under the provisions of 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 Countervailing Duty on Subsidised Articles and for Determination of Injury) Rules, 1995, as amended from time to time (hereinafter referred to as the ‘Rules’), contending that these countervailing duties imposed on imports of “Saccharin” (hereinafter also referred to as “product under consideration” or “PUC” or “subject goods”), originating in or exported from China PR, are being circumvented by way of exports of “Saccharin” (hereinafter referred to as “product under investigation” or “PUI”) from Thailand (hereinafter referred to as the “subject country”).

A. Background

1. The Designated Authority on 26th March 2024, vide Notification No. 7/34/2023-DGTR, initiated the sunset review investigation of countervailing duties imposed on imports of Saccharin from China PR. Final findings recommending continuation of definitive countervailing duty on imports of Saccharin originating in or exported from China PR was issued on 27th November 2024. The Ministry of Finance vide Customs Notification No. 01 of 2025-Customs (CVD), dated 25th February 2025 imposed the definitive countervailing duties recommended. These duties are still in force on imports of the subject goods from China.

B. Product under Consideration

2. The product under consideration is “Saccharin” (hereinafter also referred to as "subject goods" or "product under consideration" or "PUC"). The product under consideration defined in the last concluded investigation, the sunset review investigation of countervailing duty was as

under:

“11. The product under consideration in the present investigation is “Saccharin in all its forms”. “Saccharin is a non-nutritive sweetener and considered to be low calorie substitute for cane sugar. Primarily there are two types of Saccharin i.e. soluble and insoluble. In market parlance soluble saccharin is called sodium saccharin whereas insoluble saccharin is called saccharin or saccharin acid. Saccharin is produced in two physical forms, viz. granular and powder. Sodium saccharin in granular form is used in situations where saccharin will be dissolved, the powder form which has been grounded and spray dried is used in dry mixes and pharmaceuticals. It is slightly soluble in water. Insoluble form of saccharin is used in many pharmaceutical and medical applications. Saccharin is used in a variety of industry such as food and beverage, personal care products, table top sweeteners, electroplating brighteners, pharmaceuticals, etc. All forms of Saccharin are within the scope of the present investigation.

12. The present investigation being a sunset review investigation, the scope of the product under consideration remains the same as defined in the original investigation. The Authority considers that the customs classification is only indicative and is not binding on the scope of the PUC in the present investigation.

13. With regard to the claim on price and cost of the product varying based on mesh size, the Authority notes that no evidence has been provided by the interested parties substantiating such argument. Further, the Applicants have placed on record in this regard, the cost of production and descriptions of the process of selecting mesh size, clearly establishing that the mesh size does not affect the cost or price of the final product.

14. As regards the Applicants submission that the product under consideration includes all forms of saccharin, and in particular- soluble saccharin, sodium saccharin, and the salt of saccharin, as well as insoluble saccharin, the Authority first refers to its statements in the final findings of the original investigation, where it was held that soluble saccharin is called sodium saccharin in market parlance. Further, from analysis of the literature placed on record by the Applicants, it is evident that salt of saccharin is merely a different term for sodium saccharin and soluble saccharin. It is thus evident that salt of saccharin is also a form of saccharin. Therefore, it is held that salt of saccharin is also a form of saccharin, and is included within the scope of the product under consideration in the present investigation.

15. The product under consideration is classified under Chapter 29 of the First Schedule to the Customs Tariff Act, 1975. Saccharin is classified under HS Code 29251100. The customs classification is indicative only and not binding on the scope of the investigation.

16. After considering the information on record, the Authority considers that there is no known difference in product under consideration exported from the subject country and the subject goods produced by the domestic industry. The subject goods produced by the domestic industry are comparable to the subject goods exported from the subject country in terms of characteristics such as physical and chemical characteristics, functions and uses⁹ product specifications, distribution and marketing and tariff classification of the goods. The two are technically and commercially substitutable. The consumers are using the two interchangeably.

17. The Authority holds that the subject goods produced by the Applicants are like article to the product under consideration exported from the subject country, in accordance with the Rules."

3. The product under consideration is classified under Chapter 29 of the Customs Tariff Act, 1975 under customs subheading 29251100. The customs classifications are indicative only and in no way binding on the scope of this investigation.

C. Product under Investigation

4. The product under investigation which is allegedly circumventing the countervailing duty in force on imports of the product under consideration from China PR, is Saccharin exported from Thailand, also referred to as "product under investigation" or "PUI". The PUI is classified under Chapter 29 of the Customs Tariff Act, 1975 under customs subheading 29251100. However, customs classifications are indicative only and in no way binding on the scope of this investigation.

D. Domestic Industry and Standing

5. Rule 2(b) defines domestic industry as follows:
"domestic industry means the domestic producers as a whole engaged in the manufacture of the like article or those whose collective output of the said article constitutes a major proportion of the total domestic production of that article, except when such producers are related to the exporters or importers of the alleged subsidised article, or like article from other countries or are themselves importers thereof, the term "domestic industry" may be interpreted as referring to the rest of the producers."
6. The application has been filed by Swati Petro Products Ltd. and Blue Jet Healthcare Ltd. There are two other producers producing subject goods, namely, A. S. Chemopharma Pvt. Ltd. and Shree Vardayini Chemical Industries Pvt Ltd., who have supported the application filed.
7. The Applicants have claimed that they have not imported the subject goods from the subject country, nor are they related to any producer/exporter in China or Thailand or any importer in India. On the basis of the information available, the Authority is satisfied that the application

has been made 'by or on behalf of the domestic industry' in terms of Rule 2(b) and Rule 5(3) of the Rules.

E. Grounds for Alleged Circumvention and Undermining Remedial Effect:

8. The application for anti-circumvention investigation has been filed seeking extension of existing countervailing duty levied on the PUC vide Notification No. 01/2025- Customs (CVD) dated 25th February 2025 to the PUI from Thailand, allegedly circumventing the existing countervailing duty. The Applicants have furnished reasons/evidence for seeking anti-circumvention investigation which includes:
 - a. The Applicants have alleged that the countervailing duty imposed on imports of Saccharin originating in or exported from China PR is being circumvented through imports consigned from Thailand.
 - b. It is claimed that there has been a significant change in the pattern of trade following the imposition of countervailing duty on China PR and the cessation of anti-circumvention duties on Thailand in February 2025. It is alleged that there is no sufficient due cause or economic justification for the change in pattern of trade other than avoidance of countervailing duty.
 - c. Imports of Saccharin from Thailand reportedly commenced only after imposition of countervailing duty on China PR in August 2019, increased thereafter, declined following imposition of anti-circumvention duties on Thailand in October 2022, and have intensified again after cessation of duties on Thailand.
 - d. The Applicants have alleged that Saccharin exported from Thailand is not produced in Thailand but is of Chinese origin and merely routed through Thailand to avoid payment of countervailing duty.
 - e. It is contended that there are no genuine manufacturing facilities for Saccharin in Thailand and that the identified exporter operates as a trader/export house rather than a producer.
 - f. The Applicants have relied on findings of the previous anti-circumvention investigation, wherein exports from Thailand were concluded to be of Chinese origin incorporating subsidised inputs.
 - g. The Applicants have further contended that import prices from Thailand are lower than import prices from China PR. It is alleged that the landed price of imports from Thailand undercuts the selling price of the domestic industry and that such price undercutting has increased in the proposed POI
 - h. The Applicants have claimed that imports from Thailand have increased in volume and market share, reaching a significant share of the domestic demand during the proposed POI.
9. The Applicants have requested retrospective imposition of countervailing duty on the PUI circumvented through Thailand.
10. The Authority, on the basis of the prima facie evidence provided by the Applicants notes that (i) there is a change in the pattern of trade wherein imports of Saccharin from Thailand have

increased to a significant level in 2024-25 and the POI without any sufficient cause or economic justification and (ii) such imports of Saccharin from Thailand are undermining the remedial effects of the existing countervailing duty measure imposed on the PUC from China PR.

F. Initiation

11. On the basis of the application filed by the Applicants in the form and manner prescribed, contending circumvention of existing countervailing duty measures imposed on imports of the PUC from China PR by imports of the PUI from Thailand and having satisfied itself on the change in pattern of trade undermining the remedial effect of the existing countervailing duty measures, the Authority hereby initiates an anti-circumvention investigation in accordance with Section 9(1)(i) of the Act and Rules 25 and 26 of the CVD Rules to consider extension of the existing countervailing duty on the imports of PUC imported from China to the PUI imported from Thailand from the date of initiation of this investigation in accordance with the Rule 27 of the Rules.

G. Retrospective Imposition of Duty and Need for Provisional Assessment

12. The Applicants have requested the Authority to recommend retrospective imposition of countervailing duty in accordance with Rule 27(1) and recommend provisional assessment in accordance with Rule 26(4) of the Rules. The interested parties may offer their comments in this regard as per the time limit given in this notification.
13. In view of the above, the Authority recommends provisional assessment of all imports of the product under consideration till completion of this review, in accordance with Rule 26(4) of the Rules

H. Subject Countries

14. The subject country involved in the circumvention is Thailand.

I. Period of Investigation

15. The Authority has considered the period of investigation from April 2025 – September 2025 (6 months) as proposed by the applicant. The injury investigation period has been considered as 2022-23, 2023-24, 2024-25, and the POI.

J. Submission of Information

16. All the interested parties are required to register themselves on SETU Portal (<https://setu.dgtr.gov.in/>). All communications and submissions from the interested parties shall be uploaded on the SETU portal under their registered name and corresponding case ID-CVD/AC/19122025/01. It should be ensured that the narrative part of the submission is in

searchable PDF/MS-Word format and data files are in MS-Excel format.

17. The known producers/exporters in the subject country, the government of the subject country through its embassy in India, and 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 in the form and manner prescribed within the time limit set out below. 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.
18. Any other interested party may also make submissions relevant to the investigation in the form and manner prescribed within the time-limit set out below. Any party making any confidential submission before the Authority is required to make a non-confidential version of the same available to the other parties.
19. The interested parties are further advised to keep a regular watch on the official website of the Directorate General of Trade Remedies at www.dgtr.gov.in and SETU portal (<https://setu.dgtr.gov.in/>) for any updated information with respect to this investigation. Interested parties are directed to regularly visit the website of DGTR www.dgtr.gov.in to stay apprised with the further developments in the subject investigation and remain informed regarding notices that may be issued from time to time regarding questionnaire formats, PCN methodology, PCN discussion /meeting schedule, notice of oral hearing, disclosure, corrigendum, amendment notifications, and other such information.

K. Time Limit

20. Any information relating to the present investigation should be uploaded on the SETU portal (<https://setu.dgtr.gov.in>) under their registered name and corresponding case ID-CVD/AC/19122025/01. Both versions of each submission, the confidential version (CV) and the non-confidential version (NCV) must be uploaded in the respective designated columns within 37 days from the date on which the nonconfidential 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 country 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.
21. 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 through SETU portal only.
22. The 15-day period to file comments on the scope of the PUC/ PCN Methodology shall run concurrently with the time limit mentioned above in this Initiation Notification

23. Extension due to Modification of PUC/PCN: An extension of time by 15 days shall be granted if the Authority, through a subsequent notice, modifies the PUC, and PCN that was not previously proposed or is different from the initiation notification. This extension of 15 days shall be granted from date of such notification of modified PUC and PCN. Extension of time by 15 days stated in this paragraph is not applicable in instances where there is no change in the PUC, and PCN methodology after initiation of investigation. Requests for a further extension of time, beyond the 15-day extension (if granted), will ordinarily not be considered except in case of exceptional circumstances, in line with the Rule 6(4) of the AD Rules.
24. Any request for an extension must be submitted by the concerned parties through the SETU portal at least one day before the original deadline. Requests submitted after this time will not be considered

L. Submission of information on confidential basis

25. Any party making any confidential submission or providing information on confidential basis before the Authority, is required to simultaneously submit a non-confidential version of the same in terms of Rule 8(2) of the Rules and the Trade Notices issued in this regard. Failure to adhere to the above may lead to rejection of the response/ submissions.
26. The parties making any submission (including Appendices/ Annexures attached thereto), before the Authority including questionnaire responses, are required to file confidential and non-confidential versions separately.
27. 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.
28. 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.
29. 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.
30. 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 as to why such summarization is not possible, must be provided to the satisfaction of the Authority.

31. 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.
32. 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.
33. 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.

M. Inspection of Public File

34. All non-confidential versions of submissions made by any interested parties will be accessible to other interested parties through their respective login on the SETU portal.

N. Non- Cooperation

35. 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



(Amitabh Kumar)

Designated Authority