

To be published in Part-I Section I of the Gazette of India - Extraordinary
F. No. 6/09/2026-DGTR
Government of India
Ministry of Commerce & Industry
Department of Commerce
Director General of Trade Remedies
4th Floor, Jeevan Tara Building, 5, Parliament Street, New Delhi – 11001

Dated: 20th March, 2026

INITIATION NOTIFICATION
Case No. CVD(OI) 01/2026
SETU ID - CVD/OI/001/2026

Subject: Countervailing duty/Anti-Subsidy investigation concerning imports of Multi-layer Paperboard originating in or exported from China PR and Indonesia.

F. No. 6/09/2026-DGTR: Indian Paper Manufacturers Association (hereinafter also referred to as the “applicant” or “IPMA”), has filed an application on behalf of the domestic industry before the Designated Authority, in accordance with 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 determination of injury) Rules, 1995, as amended from time to time, (hereinafter also referred to as the “Rules” or “Anti-Subsidy Rules”), alleging subsidisation of Multi-layer Paperboard (hereinafter also referred to as the “subject goods” or the “product under consideration”), originating in or exported from China PR and Indonesia (hereinafter also referred to as the “subject countries”) and requested for initiation of an anti-subsidy investigation on imports of the subject goods originating in or exported from the subject countries.

A. ALLEGATION OF SUBSIDIZATION

1. The applicant has alleged that the producers/exporters of the subject goods in the subject countries have benefited from the actionable subsidies provided at various levels by the Governments of the subject countries, including the Governments of different provinces and municipalities in which producers/exporters are located, and other ‘Public Bodies’. The applicant has relied upon the relevant Laws, Rules and Regulations, and other Notifications of the relevant Government Agencies and Public Bodies, as available in the public domain, and on the determinations of various investigating authorities which have conducted investigations of such schemes and concluded the existence of countervailable subsidy programs.

B. CONSULTATION

2. In terms of Article 13 of the Agreement on Subsidies and Countervailing Measures (ASCM), pre-initiation consultations were held with the representatives of Governments of China PR and Indonesia. The comments received have been taken on record.

C. PRODUCT UNDER CONSIDERATION

3. The product under consideration in the present investigation is “Multi-Layer Paperboard made of at least 51% white / virgin wood pulp, whether coated or uncoated”. The product under consideration includes Folding Box Board (FBB), Solid Bleached Sulphate Board (SBS), Cup Stock Paper or Board and Liquid Packaging Board, all in the range of 140 to

450 GSM. For the purpose of the present investigation, the scope of the product under consideration excludes the following:

- i. Paperboards made out of more than 49% recycled/brown pulp or fibre per-se.
- ii. Coated/uncoated cigarette boards
- iii. Two side coated artboard when imported for printing purposes.
- iv. Four and more layered paperboard, either coated, uncoated or laminated with plastic material, aluminium, or other metal for liquid packaging material.

4. Multi-layer paperboard is majorly used in the packaging sector for pharmaceuticals, FMCG products, food & beverages, electronics and high end cosmetics. The subject goods are also used for printing of brochures, as book covers and in publishing industry. Multi-layer Paperboard (cup stock) is also used to manufacture disposable cups.
5. The subject goods are classified under Chapter 48, Schedule I to the Customs Tariff Act, 1975 under the headings 4805 and 4810. The product under consideration is classified under HS codes 4805 91 00, 4805 92 00, 4805 93 00, 4810 92 00, 4810 99 00. However, it is also imported under multiple HS codes including 4802 2090, 4802 5790, 4804 1900, 4804 3900, 4804 4200, 4804 5200, 4804 5900, 4805 1900, 4810 1320, 4810 1330, 4810 1390, 4810 1430, 4810 1490, 4810 1910, 4810 1920, 4810 1990, 4810 2200, 4810 2900, 4810 3100, 4810 3200, 4810 3990, 4811 5110, 4811 5190, 4811 5910, 4811 5990, 4811 9099, 4819 1010, 4819 1090 and 4819 2090. The Customs classification is only indicative and not binding on the scope of the product under consideration.
6. 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

7. The interested parties may provide their comments, if any, on the scope of the product under consideration and the proposed PCNs within 15 days of the intimation of initiation of the investigation.

D. LIKE ARTICLE

8. The subject goods produced by the domestic industry have comparable characteristics to the subject goods imported from the subject countries 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 the present investigation, the subject goods produced by the domestic industry are being treated as "like article" to the subject goods imported from the subject countries.

E. DOMESTIC INDUSTRY AND STANDING

9. The application has been filed by the Indian Paper Manufacturers Association on behalf of the domestic industry. The following domestic producers (hereinafter referred to as “applicant domestic producers”) of the subject goods in India have provided information as part of the application requesting initiation of the present investigation.
- a. Aditya Birla Real Estate Limited (Formerly known as Century Textiles and Industries)
 - b. Emami Papers Mills Limited
 - c. ITC Limited
 - d. JK Paper Limited
 - e. Tamil Nadu Newsprint and Papers Limited
10. Apart from the applicant domestic producers, NR Agarwal Industries Limited and West Coast Paper Mills Limited are other domestic producers in India. Both the producers have supported the application.
11. The applicant domestic producers are not related to exporters of the subject goods in the subject countries or importers of the product under consideration in India. Further, none of the applicant domestic producers, barring ITC Limited, has imported the product under consideration into India during the period of investigation. ITC Limited has imported the product under consideration from non-subject countries during the period of investigation. The imports by ITC Limited are negligible in relation to production by ITC Limited, total imports into India and total demand in India.
12. In view of the above and after examination of the application, the Authority considers that the applicant domestic producers account for a major proportion of the Indian production during the period of investigation and constitute domestic industry within the meaning of Rule 2(b) of the Rules and the application satisfies the requirements of Rule 6(2) of the Anti-Subsidy Rules.

F. SUBJECT COUNTRIES

13. The application has been filed in respect of subsidized imports of product under consideration from China PR and Indonesia.

G. PERIOD OF INVESTIGATION

14. The period of investigation (“POI”) in the present investigation is 1st October 2024 to 30th September 2025 (12 months). The injury investigation period shall cover the periods 2022-23, 2023-24, 2024-25 and the POI.

H. BASIS OF ALLEGED SUBSIDISATION

15. The applicant has alleged that the Government of China PR and the Government of Indonesia maintains various countervailable subsidy programs. The domestic industry has submitted that there is sufficient evidence showing that the exporters of the subject goods have received subsidies in the form of grants, loans, guarantees, taxes, export credits, goods and services, or equity infusions, which provide countervailable benefit. The information provided by the applicant shows sufficient prima facie evidence that the below mentioned programs constitute actionable subsidies as per the Agreement on Subsidies and Countervailing Measures and the Anti-Subsidy Rules, 1995.

16. The following subsidies/programs were provided by the Government of China PR and Government of Indonesia and that the exporters and producers of the subject goods in the subject countries may have benefitted from these subsidies:

I. SUBSIDY SCHEMES IN CHINA PR

a. Programs in the Form of Provision of Goods and Services at less than adequate remuneration

1. Program No. 1 – Land use rights provided at less than adequate remuneration
2. Program No. 2 – Land Use Rights for SOEs
3. Program No. 3 – Provision of Electricity at less than adequate remuneration
4. Program No. 4 – Provision of Water for less than adequate remuneration
5. Program No. 5 – Provision of Coal for less than adequate remuneration
6. Program No. 6 – Provision of Land-Use Rights for less than adequate remuneration – Land Use Rights in Certain Industrial and SEZs
7. Program No. 7 – Provision of Caustic Soda for less than adequate remuneration

b. Programs in the Form of Tax and VAT Incentives

8. Program No. 8 – Tax Policies for the deduction of research and development (R&D) expenses
9. Program No. 9 – Income Tax Refund for Re-investment of FIE Profits by Foreign Investors
10. Program No. 10 – Income Tax Reduction for Advanced Technology FIEs
11. Program No. 11 – Preferential Tax Policies for FIEs and Foreign Enterprises and Certain Domestically- Owned Companies Which Have Establishments or Places in China and are Engaged in Production or Business Operations Purchasing Domestically Produced Equipment's
12. Program No. 12 – Preferential Tax Policies for the Research and Development of FIEs
13. Program No. 13 – VAT Refunds for FIEs Purchasing Domestically – Produced Equipment
14. Program No. 14 – Tax Reductions for Technology or Knowledge-Intensive FIEs
15. Program No. 15 – Shanghai Municipal Tax Refund for High-tech Achievement Commercialization Projects
16. Program No. 16 – Local income tax and reduction program for the productive FIEs
17. Program No. 17 – Local Income Tax Exemption and/or Reduction in SEZs in Guangdong and Hainan Island
18. Program No. 18 – Preferential Tax policies for FIEs Established in Pudong Area of Shanghai
19. Program No. 19 – Tariff and VAT Exemptions for Imported Equipment
20. Program No. 20 – Preferential tax policies for companies that are recognized as high and new technology companies
21. Program No. 21 – Tax concessions for Western Regions
22. Program No. 22 – Tax Preference Available to Companies that Operate at a Small Profit
23. Program No. 23 – Enterprise Income Tax Rate Reduction in the Tianjin Port Free Trade Zone
24. Program No. 24 – Tax credit concerning the purchase of special equipment
25. Program No. 25 – Income tax concessions for the enterprises engaged in comprehensive resource utilisation (special raw materials)

26. Program No. 26 – Income Tax Reduction for Enterprises with Foreign Investment and Foreign Enterprises established in Special Economic Zone and other designated zones
 27. Program No. 27 – Preferential Tax Policies for Foreign Invested Export Enterprises
 28. Program No. 28 – Preferential income tax policy for the enterprises in the Northeast region
 29. Program No. 29 – Dividend exemption between qualified resident enterprises
 30. Program No. 30 – Subsidies Provided in Tianjin Binhai New Area and the Tianjin Economic and Technological Development Area
- c. Programs in the Form of Preferential Loans and Lending
31. Program No.31 – Preferential Lending (including Policy Loans)
 32. Program No. 32 – Preferential export financing from the Export-Import Bank of China
 33. Program No. 33 – Preferential Loans for SOEs
 34. Program No. 34 – Allowance to Pay Loan Interest
 35. Program No.35 – Preferential Financing under One Belt One Road Initiative for Companies making Outward Investments
- d. Programs in the Form of Grants
36. Program No. 36 – Famous Brands Program/ Incentive fund for famous brand Products
 37. Program No. 37 – Grants for Antidumping Investigations
 38. Program No. 38 – Research & Development (R&D) Assistance Grant
 39. Program No. 39 – Export Assistance Grant
 40. Program No. 40 – Grants for Listing Shares
 41. Program No. 41 – Grants provided through the Provincial Fund for Fiscal and Technological Innovation
 42. Program No. 42 – International Market Fund for Export Companies
 43. Program No. 43 – State Special Fund for Promoting Key Industries and Innovation Technologies
 44. Program No. 44 – Superstar Enterprise Grant
 45. Program No. 45 – Funds for Outward Expansion of industries in Guangdong Province
 46. Program No. 46 – Grant – Special Funds for Fostering Stable Growth of Foreign Trade
 47. Program No. 47 - Interim Measures of Fund Management of Allowance for Zhongsham Enterprises to Attend Domestic and Overseas Fair
 48. Program No. 48 – Treasury Bonds Loans or Grants
 49. Program No. 49 – Various grants provided to Fuyang City and Hangzhou City
 - a. Grant for Enterprises Paying Over RMB 10 million in Taxes
 - b. Grants under the Export of Sub-Contract Services Program
 - c. Grants under Excellent New Products/Technology Award
 - d. Investment grants from Fuyang City Government for key industries
 - e. Grants for Enterprises Operating Technology and Research and Development Centers
 - f. Local and Provincial Government Reimbursement Grants on export Credit Insurance Fees
 - g. Initial Public Offering (IPO) Grants from the Hangzhou Prefecture and the City of Fuyang (Zhejiang Province) & (Anhui Province)

- 50. Program No. 50 – Grants provided by Hebei Province
 - a. Grants under the Science and Technology program of Hebei Province
 - b. Government of Shijiazhuang City Export Award
 - 51. Program No. 51 – Various grants provided to Shandong Province
 - a. Shandong Province's Special Fund for the Establishment of Key Enterprise Technology Centres
 - b. Shandong Province's Award Fund for Industrialization of Key Energy Saving Technology
 - c. Shandong Province's Environmental Protection Industry Research and Development Funds
 - d. Shandong Province's Construction Fund for Promotion of Key Industries
 - 52. Program No. 52 – Subsidy of High-Tech Industrial Development Fund
- e. Programs in the form of Equity Infusion
- 53. Program No.53 – Debt for equity swaps
 - 54. Program No. 54 – Equity infusions
 - 55. Program No.55 – Unpaid dividends
 - 56. Program No.56 – Debt Forgiveness
 - 57. Program No.57 – Deed Tax Exemption for SOEs Undergoing Mergers or Restructuring
- f. Programs in the form of Export Financing and Export Credit
- 58. Program No. 58 – Export Seller's Credit
 - 59. Program No. 59 – Export Buyer's Credit
 - 60. Program No. 60 – Export Credit Insurance Subsidies
 - 61. Program No. 61 – Other export financing from State Owned Banks
 - 62. Program No. 62 – Credit Guarantee by GOC

II. SUBSIDY SCHEMES IN INDONESIA

- a. Programs in the Form of Provision of Goods and Services at less than adequate remuneration
 - 1. Program No. 1 – Provision of standing timber for less than adequate remuneration
 - 2. Program No. 2 – Government prohibition on exports of logs
 - 3. Program No. 3 – Provision of Land at less than Adequate Remuneration
 - 4. Program No. 4 – Provision of Electricity at less than Adequate Remuneration
- b. Programs in the Form of Tax and VAT Incentives
 - 5. Program No. 5 – Reduction of Income Tax
 - 6. Program No. 6 – Exemption of Import Duty
 - 7. Program No. 7 – Exemption of Import Duty on raw materials
 - 8. Program No. 8 – Exemption of VAT
 - 9. Program No. 9 – Accelerated depreciation or amortization
 - 10. Program No. 10 – Relief from Land and Building Tax
 - 11. Program No. 11 – Tax Holiday
 - 12. Program No. 12 – Deduction in corporate income tax
 - 13. Program No. 13 – Reduction on Income Tax on Dividend
- c. Provision of Incentives in Special Economic Zones
 - 14. Program No. 14 – Reduced tax for entities in Special Economic Zones

15. Program No. 15 – Postponement of import duty on capital goods and equipment
 16. Program No. 16 – Reduction of Net Taxable Income
 17. Program No. 17 – Acceleration of fiscal depreciation and amortisation deductions
 18. Program No. 18 – Carry forward of losses
 19. Program 19 – Deduction in Land Tax
- d. Programs in the form of Export Incentives
20. Program No. 20 – Benefits for export facilitation by Indonesia EXIM Bank
 21. Program No. 21 – Export credit Guarantees
 22. Program No. 22 – Import Duty Drawback
- e. Program in the form of Preferential Loans
23. Program No. 23 – Preferential loans provided by Mandiri Bank
17. In addition to the above programs, the Designated Authority will investigate any other subsidies, which may be found to exist or were availed by the producers and exporters of the subject goods, during the injury period.

I. INJURY AND CAUSAL LINK

18. Information furnished by the applicant has been considered for assessment of injury to the domestic industry. The domestic industry has furnished prima facie evidence regarding material injury to the domestic industry caused by the alleged subsidised imports from the subject countries. The domestic industry has claimed that the volume of subject imports has increased in absolute terms and in relation to production and consumption in India at prices below the selling price and cost of sales of the domestic industry. The rate of increase in volume of imports has significantly exceeded the rate of increase in demand in the country. The domestic industry has further claimed that, due to imports of subsidised product under consideration into India, the market share of the Indian industry has declined while that of the subject imports has increased. The profitability of the domestic industry has declined and it has suffered losses, cash losses and has recorded a negative return on capital employed. Thus, the evidence provided by the applicant, prima facie shows injury to the domestic industry caused by alleged subsidised imports from the subject countries.

J. INITIATION OF THE INVESTIGATION

19. On the basis of the duly substantiated written application filed by or on behalf of the domestic industry, and having satisfied itself, on the basis of prima facie evidence submitted by the domestic industry, substantiating existence of countervailable subsidies on production and export of the subject goods from the subject countries, injury to the domestic industry and causal link between such alleged subsidisation and injury, in accordance with Section 9 of the Act read with Rule 6 of the Rules, the Authority hereby initiates an investigation to determine the existence, degree and effect of alleged subsidisation and to recommend the amount of anti-subsidy duty, which if levied, would be adequate to remove the injury to the domestic industry.

K. PROCEDURE

20. Principles, as stated under Rule 7 of the Rules, shall be followed in the present investigation.

L. SUBMISSION OF INFORMATION

21. 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/OI/001/2026. 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.
22. The known producers/ exporters in the subject countries, the Governments of the subject countries through their Embassies in India, the importers and users in India which are known to be associated 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 limits set out below. All such information must be filed in the form and manner prescribed by this initiation notification, the Anti-Subsidy Rules, and the applicable trade notices issued by the Authority.
23. Any other interested party may also make submissions relevant to the present investigation in the form and manner prescribed within the time limits set out in this initiation notification, the Rules and the applicable trade notices issued by the Authority. 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.
24. Interested parties are further directed to regularly visit the official website of the Directorate General of Trade Remedies (<https://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 (<https://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, corrigendum, amendment notifications, and other such information.

M. TIME LIMIT

25. 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/OI/001/2026. 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 non-confidential 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 countries 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.
26. 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 time limit as stipulated in this notification through SETU portal only.

27. The 15-day period to file comments on the scope of the PUC/ PCN Methodology shall run concurrently with the time limit mentioned in paragraph 25 above of this Initiation Notification.
28. 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 7(4) of the Rules.
29. Any request for an extension must be submitted by the concerned parties through the SETU portal at least one day before the original deadline specified in this notification. Requests submitted after this time will not be considered.

N. SUBMISSION OF INFORMATION ON NON-CONFIDENTIAL BASIS

30. Any party making confidential submission or providing information on a confidential basis before the Authority is required to simultaneously submit a non-confidential version of the same information in terms of Rule 8(2) of the Anti-Subsidy Rules and in accordance with the relevant trade notices issued by the Authority in this regard. Failure to adhere to the above may lead to rejection of the response/submissions.
31. The parties making any submissions (including appendices/annexures attached thereto), before the Authority including questionnaire responses, are required to file confidential and non- confidential versions separately. In case the submission is made in multiple parts, it is instructed to provide an index table in each part outlining the contents of all parts/emails and documents enclosed. Please ensure page numbering on all submissions.
32. Where the original documents are in a language other than English or Hindi, the interested parties are requested to ensure that the true translated version is provided along with the original documents.
33. The “confidential” or “non-confidential” submissions must be clearly marked as “confidential” or “non-confidential” at the top of each page. Any submission made without such marking shall be treated as non-confidential by the Authority, and the Authority shall be at liberty to allow the other interested parties to inspect such submissions.
34. 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 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.

35. The non-confidential version of the information filed by the interested parties is required to be a replica of the confidential version with the confidential information, preferably indexed or blanked out (in case indexation is not feasible) and summarised depending upon the information on which confidentiality is claimed.
36. The non-confidential summary must be in sufficient detail to permit a reasonable understanding of the substance of the information furnished on 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 8 of the Anti-Subsidy 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.
37. The interested parties can offer their comments on the issue of confidentiality claimed by the other interested parties within 7 days from the date of circulation of the non-confidential version of the documents.
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 authorise its disclosure in generalised or summary form, it may disregard such information.
39. Any submission made without a meaningful non-confidential version thereof or without good cause statement in terms of Rule 8 of the Anti-Subsidy Rules and appropriate trade notices issued by the Authority on the confidentiality claim shall not be taken on record by the Authority.
40. 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.

O. INSPECTION OF PUBLIC FILE

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

P. NON-COOPERATION

42. 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