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**F. No. 07/15/2025-DGTR**  
**Government of India**  
**Ministry of Commerce & Industry**  
**Department of Commerce,**  
**Directorate General of Trade Remedies**  
**4<sup>th</sup> Floor, Jeevan Tara Building, 5, Parliament Street, New Delhi – 110001**

**Date:20<sup>th</sup> March 2026**

**FINAL FINDINGS**  
**Case No. AD (SSR)-08/2025**

**Subject: Sunset review of anti-dumping duty concerning imports of Polyethylene Terephthalate (PET) Resin from China PR**

**F. No. 07/15/2025-DGTR:** - Having regard 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 thereof, as amended from time to time (hereinafter referred as the “Anti-Dumping Rules” or the “Rules”) thereof;

**A. BACKGROUND OF THE CASE**

1. Whereas, Indorama Yarns Private Limited, IVL Dhunseri Petrochem Industries Private Limited and Reliance Industries Limited (hereinafter referred to as the “applicants” or the “domestic industry”) filed an application, before the Designated Authority (hereinafter also referred to as the “Authority”) in accordance with the Customs Tariff Act, 1975 and the Anti-Dumping Rules for initiation of sunset review of anti-dumping duty imposed on imports of Polyethylene Terephthalate (PET) Resin (hereinafter also referred to as the “product under consideration” or the “subject goods”) from China PR (hereinafter also referred to as the “subject country”).
2. The original investigation concerning imports of subject goods from China PR was initiated by the Authority vide notification 6/24/2019-DGTR dated 1<sup>st</sup> October 2019. The Authority, vide its final findings No. 6/24/2019-DGTR dated 28<sup>th</sup> December 2020, recommended imposition of definitive anti-dumping duty for a period of five years, which was given effect vide Customs Notification No. 18/2021-Customs (ADD) dated 27<sup>th</sup> March 2021.
3. Pursuant to the imposition of duty, an anti-absorption investigation concerning the anti-dumping duty imposed on the imports of the subject goods originating from the subject country when exported by Wankai New Materials Co. Ltd. was initiated on 4<sup>th</sup> March 2024. The Authority issued final findings F. No. 7/27/2023 DGTR dated 28<sup>th</sup> August

2024, recommending the modification of the quantum of the anti-dumping duty imposed. The Ministry of Finance issued Notification 25/2024-Customs (ADD) dated 22<sup>nd</sup> November 2024 modifying the quantum of anti-dumping duty in force.

4. And whereas, in view of the duly substantiated application filed by the applicants, the Authority issued a public notice vide Notification No. 07/15/2025-DGTR dated 23<sup>rd</sup> September 2025, published in the Gazette of India, initiating anti-dumping investigation into imports of the product under consideration from China PR in accordance with Section 9A(5) of the Act, read with Rule 23(1B) of the Anti-Dumping Rules to determine the whether the expiry of existing anti-dumping duties against imports of the subject goods from China PR is likely to lead to continuation or recurrence of dumping and consequent injury to the domestic industry. After the initiation of the subject investigation, the Central Government issued its Notification No. 39/2025-Customs (ADD) dated 26<sup>th</sup> December 2025 extending the duties in force on the import of the subject goods originating in or exported from the subject country up to and inclusive of 26<sup>th</sup> June 2026.

**B. PROCEDURE**

5. The scope of the present review covers all aspects of the final findings No. 6/24/2019-DGTR dated 28<sup>th</sup> December 2020, modified by finding F. No. 7/27/2023 DGTR dated 28<sup>th</sup> August 2024, by which the Authority had recommended imposition of anti-dumping duty on imports of subject goods from the subject country, and enhanced the quantum of duty respectively.
6. The procedure described below has been followed with regard to the investigation:
  - i. The Authority issued a public notice dated 23<sup>rd</sup> September 2025, published in the Gazette of India, Extraordinary, initiating sunset review of the anti-dumping duty imposed on subject goods from the subject country.
  - ii. The Authority sent a copy of the initiation notification to the Government of the subject country, through its Embassy in India, known producers and exporters from the subject country, known importers / users and the domestic industry as well as other interested parties, as per the addresses made available by the applicant and requested them to make their views known within the prescribed time limits.
  - iii. The Authority provided a copy of the non-confidential version of the application to the known producers/exporters and to the Government of the subject country, through its Embassy in India, in accordance with Rule 6(3) of the Anti-Dumping Rules. A copy of the non-confidential version of the application was made available to other interested parties, wherever requested.
  - iv. The Authority sent exporter's questionnaire to the following known producers/exporters from the subject country to elicit relevant information in accordance with Rule 6(4) of the Rules:
    1. Abclabatory Scientific Co Ltd
    2. AL Shsaze International Trade Link

3. AN Thanh Bicol Joint Stock Co.
4. Anten Industries Joint Stock Company
5. Anthanh Bicol Joint Stock Company
6. Apelo Hongkong Limited
7. Areva Industries Pte Ltd
8. Auspro International Limited
9. Avanti Exim Pte Ltd
10. Bridge Polymers the Netherlands BV
11. CGR Trading Company Limited
12. Jinshan Associated Trading Corporation
13. China Resources Chemical Innovative Materials Co. Ltd.
14. Commerce Harbor FZE
15. Cosmoss VU Limited
16. Fujian Billion Polymerization Fiber Technology Industrial Co Ltd.
17. Grand Dignity Industrial Co. Ltd.
18. Guangdong IVL Pet Polymer Co Ltd
19. Hangzhoi Zhenrui Chemicals Co Ltd
20. Henan Lihao Chem Plant Limited
21. Hosco Pharmachem Limited
22. Hubei Decon Polyester Co Ltd
23. Indus Business Ventures Pte Ltd
24. Jiangsu Company Sinopec Chemical Commercial Holding Co. Ltd.
25. Jiangsu GTIG Huatai Co Ltd
26. Jiangsu Kingfa Sci Tech Advanced
27. Jiangsu Shuangxing Color Plastic New Materials Co Ltd
28. Jiangyin Xingyu New Material Co Ltd
29. Kates Enterprises Ltd
30. Kemo International Trade Co Limited
31. Kingfa Sci Tech Co Ltd
32. M G Polymers FZE
33. M S AN Thanh Bicol JSC
34. M S Mimosa Asia S Pte Ltd
35. Matheson Energy Pte Ltd
36. Mimosa Asia S Pte Ltd
37. Nakshatra Trading DMCC
38. Nanjing Leading Chemical Co Ltd
39. Northeast Pharm Trading Company Ltd
40. OG Trading Hong Kong Company Limited
41. Petrochem Middle East FZE
42. SBR Group Ltd
43. Shanghai Chemspace Co Ltd
44. Sino Crown International Pte Ltd
45. Sino Hover Industry Co Limited
46. Sinochem Pharmaceutical Co Ltd

47. Skyline Exports Pte Ltd
  48. SPK Consulting LLC
  49. SPRL Trading FZE
  50. Suzhou Cellpro Biotechnology Co Ltd
  51. Suzhou Hengli Chemical Fibre New Materials Co Ltd
  52. Taizhou Sanqulai Import Export Co Ltd
  53. Tas Commodities Pte Ltd
  54. Texpo International Ltd
  55. TLD Vietnam Joint Stock Co Ltd
  56. Tongkun Group Co Ltd
  57. Toyoshima And Co Ltd
  58. Tricon Dry Chemicals LLC
  59. Uniglobus Trading FZE
  60. United Raw Material Pte Limited
  61. Vasun Enterprises Trading FZE
  62. Velar International Development Ltd
  63. Wankai International Pte Ltd
  64. Wankai New Materials Co Ltd
  65. Xiamen Technology Co Ltd
  66. Wuxi Ubest New Materials Technology Co Ltd
  67. Xiamen CD Chemical Co Ltd
  68. Xiamen ITG Baodarun Industrial Co. Ltd.
  69. Xiamen Zhonghongfa Trading Co Ltd
  70. Yangzhou Reliance Chemicals Co Ltd
  71. Yangzhou Tiamat Import Export Co.
  72. Yue Xiu Textiles Co Ltd
  73. Zhejiang Hailide New Material Co Ltd
  74. Zhejiang Hengyi Petrochemicals Co Ltd
  75. Zhejiang Yousheng Industry Trade Co Ltd
  76. Zhejiang Zhongtuo Supply Chain Management Co., Ltd
- v. The Embassy of the subject country in India were requested to advise the exporters/producers from its country to respond to the questionnaire within the prescribed time limit.
- vi. In response to the initiation of the subject investigation, only Wankai New Materials Co., Ltd. responded by filing exporter questionnaire response. Post the oral hearing, a related trader of Wankai New Materials Co., Ltd., namely Wankai International Pte Ltd. submitted its exporter questionnaire response claiming that it has exported the product under consideration to India. It has submitted that such delay is due to an oversight and since the exports of Wankai through related trader are negligible, it will have no impact on the determination of margins.
- vii. The Authority sent Importer's and User's Questionnaire to the following known importers / users of the subject goods in India calling for necessary information in accordance with Rule 6(4) of the Rules.
1. A C A Polymers

2. A K Traders
3. A N I Enterprises
4. A V Polymer
5. Aaiji Polypack Private Limited
6. Abhilasha Impex Private Limited
7. Active International
8. Aglo Exports Private Limited
9. Aglo Packagings Limited
10. Aglo Packagings Limited
11. Aglo Polymers Private Limited
12. Ahimsa Industries Limited
13. Airing Industries
14. Akansha Ship Breaking Private Limited
15. Ambica Corporation Limited
16. AMD Petro And Food Private Limited
17. Amrit Polychem Private Limited
18. Amulyam Poly Exim
19. Annapurna Pet Private Limited
20. Aqua Polymers
21. Aquafresh Polyplast
22. Aradhya Overseas
23. Aroma Organics Limited
24. Ascend International
25. Ashu Enterprises
26. Aspire Polytrade Private Limited
27. Ausean Global LLP
28. Avanti Exim India Private Limited
29. Avi Global Plast Private Limited
30. Aym Syntex Limited
31. Ayush Texlene Limited
32. Bafna Polymers India
33. Bafna Polymers India Private Limited
34. Bandaru Polymers
35. Bharat Monofilament Textiles Private Limited
36. Bhavya Polyfilms Private Limited
37. Bhilosa Industries Private Limited
38. Blue Star Pack Kraft
39. Bohra Associates
40. Bolton Petforms Private Limited
41. Cabisco Plast Private Limited
42. Cabisco Plastic LLP
43. Chem International
44. Cosmoplast
45. Creative Propack Limited

46. Creative Proplast Limited
47. D P Enterprises
48. Dhananjay Plast
49. Dhaulagiree Polyolefins Private Limited
50. Diamond Polycoats
51. Dosch Pharmaceuticals Private Limited
52. Durjaya Estates Private Limited
53. Divya Polytech Private Limited
54. Engineered Polymers India Private Limited
55. Epitome Petropack Limited
56. Flexilis Private Limited
57. Fortune Containers
58. G Plast Private Limited
59. G R Pet Preforms
60. Ganapati Fishing Lines Private Limited
61. GBC Packaging
62. Glory Industries
63. Goodway Chemicals Private Limited
64. Grace Trading
65. Green Pet Strap Private Limited
66. Greenstrap LLP
67. HP Pet
68. Happy Poly Koats
69. HB Polymers Private Limited
70. Hindustan Coca-Cola Beverages Private Limited
71. Impark
72. Interplex India Private Limited
73. Isha Plast Impex Private Limited
74. Ishaan Plastics Private Limited
75. Iyra Polymers Private Limited
76. J J Plastalloy Private Limited
77. J K Polymers Industries
78. Jagdamba Polymers Private Limited
79. Jai Gopal International Impex Private Limited
80. Jaimaruti Polychem LLP
81. Jainson Cables India Private Limited
82. Jairam Strap Private Limited
83. Jay Ambey Filament Private Limited
84. Jay Multti Tech
85. Jaycee Engineering Private Limited
86. JB Polypack Private Limited
87. Jebruna International Private Limited
88. Jebruna International Private Limited
89. Jell Pharmaceuticals Private Limited

90. John Polymers
91. K C Preforms
92. K S Plastics India Private Limited
93. Kanti Beverages Private Limited
94. KDS International Private Limited
95. Kingfa Science Technology Private Limited
96. Kiran Polyfab Private Limited
97. Komal Polymers
98. Kosmos Petrochem
99. Krupa Polymers India Private Limited
100. Kruti Chemplast LLP
101. Krystals Impex
102. Lakshay Propack LLP
103. Laxmi Trading Company
104. Light Walk Private Limited
105. Lila Polymers Private Limited
106. LPB Plastic Private Limited
107. MS Impex
108. MS Plast
109. Madhav International
110. Madhu Plastics Private Limited
111. Madhu Plastics Private Limited
112. Mahavir Engineering And Plastics Works
113. Marudhar Petrochem
114. Maruti Overseas
115. Marvel Polyexim LLP
116. Maskara Impex LLP
117. Mayur Straps Packaging Industries
118. Megha Fruit Processing Private Limited
119. Merit Straps And Packaging Industries
120. Mittal Lamination
121. Mix Media Signages LLP
122. MM9 Polytrade Private Limited
123. Murlidhar Overseas Private Limited
124. N R Industries
125. National Plasto Containers Private Limited
126. National Polyplast India Private Limited
127. Neelgiri Poly Plast Private Limited
128. Nescopet Private Limited
129. Nexus Petrochem Private Limited
130. Nirmal Poly Plast Private Limited
131. Nishant Mouldings Private Limited
132. Nitin Plastic
133. Noble Exim

134. Noble Packaging
135. Nova Polymers
136. NSV India Overseas LLP
137. Ocean Packaging Private Limited
138. Om Impex
139. Omkar Industries Limited
140. Oracle Polyplast
141. Organic Industries Private Limited
142. Oriilon India Private Limited
143. Oswal International
144. Pan Synthetic Private Limited
145. Parmeshwar Impex Private Limited
146. Parmeshwar Overseas Trade
147. Pawan Chemicals
148. Penta Pack Polymers Private Limited
149. Perfect Filaments Limited
150. Perlon Goa Private Limited
151. PET Equipment Resales Private Limited
152. PET India Industries
153. Petrotech Chemica Private Limited
154. Petrotech Products India Private Limited
155. Plastiblends India Limited
156. Plastscapes Overseas Private Limited
157. Poddar Pigments Limited
158. Polstar
159. Polyset Plastics Private Limited
160. Polyset Plastics Private Limited
161. Prakrit Impex Private Limited
162. Praveen Polymers Private Limited
163. Puri Polymers
164. PVC Colouring Compounding Processing
165. Qber Petrochem
166. Raga Pet
167. Raj Polymers
168. Rajshree Polypack Limited
169. Ramcham Packaging Private Limited
170. Rapid Pet Industries
171. RCK Impex Private Limited
172. Ready Package
173. RGP Impex Private Limited
174. RGS Pet Strap LLP
175. Ridam Impex Private Limited
176. Rishabh Triexim LLP
177. Rivaansh Polymers

178. RKG Polyplast Private Limited
179. Rudra International
180. Rungta Mouldings Private Limited
181. Ruptex Mineral Water Private Limited
182. S G Polymers
183. S L V Pet Industries
184. S S Polymers Impex Private Limited
185. Saavi Trading Company
186. Sajo Polytek Private Limited
187. Sanjay Chemicals Private Limited
188. Sara Enterprises
189. Satish Agrawal
190. SE Textiles Private Limited
191. SG Exim
192. Sheth Pet And Polymers Private Limited
193. Shiv Enterprises
194. Shiv Pet
195. Shlok Chemicals
196. Shree Ganesh Enterprises
197. Shree Nakoda Polymers
198. Shrinath Rotopack MP Private Limited
199. Shrinath Rotopack Private Limited
200. Sibi Polymers
201. Siddhan Traders
202. Siddharth Plast
203. Sim Polymers LLP
204. Sim Trade Links
205. SJR Plast
206. Skydom Industries
207. Skyone International
208. SNJ Synthetics Limited
209. Spatlus Enterprise LLP
210. Sri Govind Polymers
211. Sri Venkateshwara Polymers
212. Starchem Polytrade Private Limited
213. Starlon Exim Private Limited
214. Steel Containers LLP
215. Sun Polytrade LLP
216. Sunlarge Filaments Private Limited
217. Sunlarge Industries Private Limited
218. Superfil Products Private Limited
219. Surya Impex
220. Svastyayana Chemistry
221. Swaashpet Polymers Private Limited

- 222. Tarajyot Enterprise Private Limited
- 223. Topsack Exports Private Limited
- 224. Tricon Energy India Private Limited
- 225. Tricon Energy India Private Limited
- 226. Triliance Global Trade LLP
- 227. Trust Polymer
- 228. Turakhia Polymers Private Limited
- 229. U D Caps Private Limited
- 230. Uflex Limited
- 231. Unify Texturisers Private Limited
- 232. Universal Corporation
- 233. Vacmet India Limited
- 234. Varun Beverages Limited
- 235. Varun Beverages Limited
- 236. Verpack Plastics Private Limited
- 237. Vigilant Specialities Private Limited
- 238. Vinay Plastics
- 239. Vinayak Beverages
- 240. Viney Aggarwal Industries Private Limited
- 241. Virat Impex
- 242. Vishal Beverages Private Limited
- 243. Voltson India
- 244. Vriddhi Petrochemicals
- 245. Vrion Global Private Limited
- 246. Vton Plastic Industries Private Limited
- 247. Waterproof Corporation Private Limited
- 248. Wisechoice Enterprises
- 249. Yashpet Container
- viii. No importer/user has responded by filing an importer or user questionnaire response.
- ix. The Authority sent a copy of the non-confidential version of the application to the following users' associations. No user association has filed responses or submissions.
  - 1. All India Federation of Plastics Industries
  - 2. All India Plastic Industries Association
  - 3. All India Plastic Manufacturers' Association
  - 4. Federation of Indian Chamber of Commerce and Industry (FICCI)
  - 5. Associated Chambers of Commerce and Industry of India (ASSOCHAM)
  - 6. Confederation of Indian Industry (CII)
- x. The Authority made available non-confidential version of the evidence presented by various interested parties. A list of all interested parties was uploaded on the DGTR website, along with the request to all of them to email the non-confidential version of their submissions to all the other interested parties.

- xi. The period of investigation (POI) for the purpose of present investigation is 1<sup>st</sup> April 2024 to 31<sup>st</sup> March 2025. The examination of trends in the context of injury analysis covered the periods 2021-22, 2022-23, 2023-24 and the period of investigation.
- xii. Request was made to DG Systems to provide the transaction-wise details of imports of subject goods for the injury period and also the period of investigation. The Authority has relied upon the DG Systems data for computation of the volume of imports and required analysis after due examination of the transactions.
- xiii. After the initiation of the subject investigation, the Central Government issued its Notification No. 39/2025-Customs (ADD) dated 26<sup>th</sup> December 2025 extending the duties in force on the import of the subject goods originating in or exported from the subject country up to and inclusive of 26<sup>th</sup> June 2026.
- xiv. In accordance with Rule 6(6) of the Rules, the Authority provided opportunity to the interested parties to present their views orally in a public hearing held on 7<sup>th</sup> January 2026. The parties, which presented their views in the oral hearing, were requested to file written submissions of the views expressed orally, followed by rejoinder submissions.
- xv. The submissions made by the interested parties during the course of this investigation, to the extent supported with evidence and considered relevant to the present investigation, have been appropriately considered by the Authority, in the present final findings.
- xvi. The Authority, during the course of the investigation, satisfied itself as to the accuracy of the information supplied by the interested parties, which forms the basis of the present disclosure statement, to the extent possible and verified the data/documents submitted by all the interested parties to the extent considered relevant, practicable and necessary.
- xvii. Information provided by the interested parties on confidential basis was examined with regard to sufficiency of the confidentiality claim. On being satisfied, the Authority has accepted the confidentiality claims wherever warranted and such information has been considered as confidential and not disclosed to other interested parties. Wherever possible, parties providing information on confidential basis were directed to provide sufficient non-confidential version of the information filed on confidential basis.
- xviii. The non-injurious price (NIP) based on the optimum cost of production and cost to make & sell the subject goods in India as per the information furnished by the domestic industry on the basis of Generally Accepted Accounting Principles (GAAP) and Annexure III to the Rules has been worked out so as to ascertain whether anti-dumping duty lower than the dumping margin would be sufficient to remove injury to the domestic industry.
- xix. Wherever an interested party has refused access to or has otherwise not provided necessary information during the course of the present investigation, or has significantly impeded the investigation, the Authority has considered such parties as non-cooperative and recorded the views/observations on the basis of the facts available.

- xx. The Authority, during the course of the investigation, satisfied itself as to the accuracy of the information supplied by the interested parties, which forms the basis of the present final findings to the extent possible and verified the data/documents submitted by all the interested parties to the extent considered relevant, practicable and necessary.
- xxi. The Authority circulated the disclosure statement containing all essential facts under consideration for making the final recommendations to the Central Government to all interested parties on 24<sup>th</sup> February 2026. The Authority has examined all the post-disclosure comments made by the interested parties in these final findings to the extent deemed relevant. Any submission which was merely a reproduction of the previous submissions, and which had been adequately examined by the Authority has not been repeated for the sake of brevity.
- xxii. ‘\*\*\*’ in these final findings represents information furnished by an interested party on confidential basis and so considered by the Authority under the Rules.
- xxiii. The exchange rate adopted by the Authority for the subject investigation is 1 US\$ = ₹ 85.43

## **C. PRODUCT UNDER CONSIDERATION AND LIKE ARTICLE**

### **C.1. Views of other interested parties**

- 7. No submissions have been made by the other interested parties regarding the scope of the product under consideration and like article.

### **C.2. Views of the domestic industry**

- 8. The following submissions have been made by the domestic industry with regard to the product under consideration and like article:
  - i. The product scope considered by the Authority in the original investigation may be considered for the scope of the present investigation.
  - ii. The domestic industry has sold different grades of the product having varied viscosities, colours and melting points. However, such change in grades do not cause any significant change in the cost of production and do not warrant a PCN methodology.
  - iii. No PCN methodology was adopted in the original investigation.

### **C.3. Examination by the Authority**

- 9. At the time of initiation of the present investigation, the Authority considered the following as the scope of product under consideration.

*“The product under consideration is virgin bottle-grade polyethylene terephthalate (PET) Resin, defined as “polyethylene terephthalate resin having intrinsic viscosity of 0.72 deciliters per gram or higher”. The scope of product*

*under consideration excludes recycled PET resin. PET Resin is used for the manufacturing of preforms, which are then converted into PET bottles and jars for the storage of mineral water, carbonated soft drinks, edible oils, pharmaceutical products etc”*

10. It is also noted that the present investigation being a sunset review investigation, the scope of the product under consideration remains the same as defined in the previously conducted investigations. In view of no submissions regarding scope of product under consideration, the Authority has considered the product under consideration for the purpose of the review, same as the original investigation.
11. With regard to the submissions on PCN methodology, the Authority notes that no PCNs were adopted in the original investigation. The domestic industry has submitted that it has sold different grades of like article bearing different viscosities, colours and melting points. However, the difference in grades does not result in significant change in costs. The same has not been disputed by any interested party. Thus, the Authority has not adopted any PCN methodology in the present investigation.
12. The Authority notes that the product produced by the domestic industry is like article to the goods exported from the subject countries. The product produced by the domestic industry and imported from the subject countries are comparable in terms of physical & chemical properties, functions & uses, product specifications, pricing, distribution & marketing and tariff classification of the goods. The subject goods imported from the subject countries and produced by the domestic industry are technically and commercially substitutable and used by the consumers interchangeably. In view of the same, it is concluded that the product manufactured by the domestic industry is considered as like article to the product imported into India.
13. The product under consideration is classified under Chapter 39 of the Customs Tariff Act, 1975 under the subheading 3907. The subject goods are being imported under HS Codes 3907 61 10, 3907 61 90, 3907 69 30, and 3907 69 90. The Customs classification is only indicative and not binding on the scope of the product under consideration in the present investigation.

#### **D. SCOPE OF THE DOMESTIC INDUSTRY & STANDING**

##### **D.1. Views of other interested parties**

14. The following submissions have been made by the other interested parties with regard to the scope of domestic industry and standing.
  - i. The applicants have failed to provide details of imports of subject goods from all countries over the injury period, as required by the application proforma and the Manual of Operating Practices.

- ii. IVL Dhunseri and Indorama have imported the subject goods from other countries and the same may be examined.
- iii. The signed declaration regarding imports made by IVL Dhunseri from subject country has not been provided.
- iv. The inclusion of Indorama and IVL Dhunseri as part of domestic industry is unjustified considering they are related to a producer in China.
- v. While Minocha Enterprises Private Limited has been identified as a domestic producer, its production has not been considered for calculation of total Indian production.
- vi. Ester Industries Limited, a domestic producer which has participated in the investigation concerning subject goods in the US, has not been considered as a domestic producer by the applicants.

## **D.2. Views of the domestic industry**

15. The following submissions have been made by the domestic industry with regard to the scope of domestic industry and standing:
  - i. The applicants have not imported the subject goods from subject country during the period of investigation.
  - ii. The applicants have given details of imports from all sources in Proforma IV A, which shows that there are no imports from any country. There is no requirement for a specific declaration in this regard.
  - iii. Rule 2(b) only calls into question the eligibility of an importer of alleged dumped article. Thus, imports from other countries are irrelevant to the investigation.
  - iv. IVL Dhunseri Petrochem Industries Limited and Indorama Yarns Private Limited are related to, Guandong IVL PET Polymer Co. Ltd, a producer/exporter of subject goods in the subject country. However, it has not exported the subject goods to India in the period of investigation.
  - v. Due to no exports from Guandong IVL PET Polymer Co. Ltd, it does not qualify as an exporter under Rules 2(b) of Anti-dumping Rules and IVL Dhunseri and Indorama cannot be considered ineligible.
  - vi. Rule 5 of the Anti-Dumping Rules does not apply to sunset review under Rule 23 and there is no requirement of establishing standing in the present case. Without prejudice to this, the Indian production has been calculated appropriately.
  - vii. Ester Industries is not a producer of subject goods in India. A declaration in this regard has been provided by the company.
  - viii. Due to a typographical error, MEPL was incorrectly mentioned as Minocha Enterprises Private Limited in the application. It is clarified that MEPL is Madelin Enterprises Private Limited, which has supported the investigation, and its production has been considered in the total Indian production.

## **D.3. Examination by the Authority**

16. Rule 2(b) of the Anti-Dumping Rules defines domestic industry as under:

*“(b) “domestic industry” means the domestic producers as a whole engaged in the manufacture of the like article and any activity connected therewith 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 dumped article or are themselves importers thereof in such case the term ‘domestic industry’ may be construed as referring to the rest of the producers”.*

17. The Authority notes that the application for initiation of the present sunset review investigation was filed by IVL Petrochem Industries Private Limited (“IVL Petrochem”), Indorama Yarns Private Limited (“Indorama”) and Reliance Industries Limited (“RIL”). The applicants have submitted, that, there are other domestic producers of the subject goods in India, namely, Chiripal Polyfilms Limited, Jindal Polyfilms Limited, Madelin Enterprises Private Limited (“MEPL”), Sumilon Industries Limited and Uflex Limited. The Authority notes that out of the above, MEPL has supported the present investigation. Further, the production information of MEPL and Chiripal Polyfilms Limited was provided in the application as per market estimates. However, MEPL provided its support letter after the initiation of the investigation. The Authority has considered the production of MEPL as per its actual production for determination of total Indian production.
18. The Authority notes that the applicants have not imported the subject goods from the subject country during the period of investigation. In this regard, it is noted that the interested parties have contended that IVL Petrochem and Indorama have imported the subject goods. However, no information regarding such imports have been provided by the interested parties. The applicants have disputed the contention of the interested parties. The Authority has examined the DG Systems data in this regard. It is noted that IVL Petrochem and Indorama have not imported the product under consideration from the subject country. Further, the applicants are not related to an importer or exporter of the alleged dumped article.
19. In this regard, the Authority notes that IVL Petrochem and Indorama are related to a producer of the product under consideration in China, namely Guandong IVL PET Polymer Co. Ltd. The applicants have claimed that the related exporter has not exported the product under consideration to India during the period of investigation. Such fact has not been disputed by the interested parties, though they claim that IVL Petrochem and Indorama be treated as ineligible to constitute domestic industry. The Authority has also examined the DG Systems data and notes that there are no exports of the product under consideration by Guandong IVL PET Polymer Co. Ltd. Therefore, IVL Petrochem and Indorama cannot be considered related to an exporter of the dumped article. It is further noted that in the original investigation, the Authority considered IVL Petrochem as eligible to constitute domestic industry, even though the related exporter had exported insignificant quantities. In view of the foregoing, it is concluded that the applicants are eligible to constitute domestic industry.

20. The interested parties have claimed that the applicants have not considered the production of Ester Industries and Minocha Enterprises Private Limited. In this regard, the interested parties claimed that the applicants themselves identified Minocha Enterprises Private Limited as a domestic producer of the subject goods but did not consider its production in the total production. The applicants have clarified that due to an error, Madelin Enterprises Private Limited (MEPL) was written as Minocha Enterprises Private Limited (MEPL) in the list of domestic producers at Annexure 1.7. However, the production of MEPL was considered in the determination of Indian production. Further, MEPL, that is, Madelin Enterprises Private Limited has also filed letter supporting the request for review.
21. As regards Ester Industries Limited, the interested parties have relied upon the investigation by US investigating authority, wherein the producer was given an individual rate of duty. However, the domestic industry has provided a certificate from Ester Industries Limited, confirming that they do not produce the subject goods falling within the present product scope, that is, bottle-grade PET Resin having intrinsic viscosity above 0.72 deciliters. The Authority further notes that the scope of investigation by the US authorities was much wider, as defined below.

*“The merchandise covered by these orders is PET resin having an intrinsic viscosity of at least 0.70, but not more than 0.88, deciliters per gram. The scope includes blends of virgin PET resin and recycled PET resin containing 50 percent or more virgin PET resin content by weight, provided such blends meet the intrinsic viscosity requirements above. The scope includes all PET resin meeting the above specifications regardless of additives introduced in the manufacturing process.”*

22. Thus, the scope of investigation by US authorities was not limited to bottle-grade PET Resin. Further, it included blends of virgin and recycled PET Resin as well, whereas the present review relates to only virgin PET Resin. Therefore, given the explicit clarification by Ester Industries Limited themselves, no inference can be drawn by the participation in the US investigation.
23. In view of the above, the Authority notes that, in addition to the applicants, the subject goods are being produced by Chiripal Polyfilms Limited, Madelin Enterprises Private Limited, Sumilon Industries, and Uflex Limited. The share of applicants in total production is noted as below.

Particulars	Unit	Production (POI)	Share in Total Production
<b>Applicants</b>	<b>MT</b>	<b>***</b>	<b>80-90%</b>
<b>Other Producers</b>	MT	***	<b>10-20%</b>
Chiripal Polyfilms Limited	MT	***	**%

Madelin Enterprises Private Limited	MT	***	**%
Sumilon Industries	MT	***	**%
Uflex Limited	MT	***	**%
<b>Total Indian Production</b>	MT	<b>19,33,103</b>	

24. The Authority notes that the production of the applicants constitute a major proportion, that is, 80-90% of the total Indian production. In view of the foregoing, the Authority concludes that the applicants constitute domestic industry under Rule 2(b) of the Anti-Dumping Rules.

**E. CONFIDENTIALITY**

**E.1. Views of other interested parties**

25. No submissions have been made by the other interested parties with regard to confidentiality.
- i. The domestic industry has claimed excessive confidentiality with regards to source of import information used.
  - ii. The details and production of other domestic producers have not been provided. Further, the source of its information for production has not been disclosed.
  - iii. The evidence for adjustments claimed for export price have not been disclosed by the domestic industry.
  - iv. The details of normal value and dumping margin have been claimed confidential.
  - v. The number of employees; profit / loss, return on capital employed and range of net selling price, costing information such as elements of cost and names of raw materials and annual reports have not been disclosed by the domestic industry.
  - vi. The non-confidential version is not a replica of the confidential version, as required under Trade Notice 1/2013, particularly with regard to having the same number of pages.
  - vii. The correctness certificate and declaration by legal representative have not been provided as part of application.
  - viii. The investigation is ongoing and parties are entitled to make submissions on all aspects, including confidentiality, during the course of the investigation. The domestic industry cannot absolve itself of its obligation to provide meaningful disclosure on the pretext of exhaustion of time.
  - ix. The domestic industry has not provided complete non-confidential versions of several documents and has withheld material information, thereby preventing Wankai from making effective comments.
  - x. No adverse inference may be drawn against Wankai on the basis of information that has not been disclosed in a meaningful manner.

**E.2. Views of the domestic industry**

26. The following submissions have been made by the domestic industry with regard to confidentiality.
- i. Wankai has not provided indexed figures for details of capacity, production, and domestic sales, exports and inventories from 2018 to 2024 in Part II of the exporter questionnaire response.
  - ii. The claims of excessive confidentiality have been made only at the time of oral hearing. Such claims are extremely belated, considering the 7 days deadline provided in the Initiation Notification.
  - iii. The source of market intelligence information considered is not required to be disclosed under Trade Notice 10/2018. The domestic industry has disclosed the summary of imports.
  - iv. The details of other domestic producers have been provided in Annexure 1.7.
  - v. The production details of other producers and evidence of ocean freight considered are third party information, which the domestic industry is not authorized to disclose. However, the domestic industry has disclosed the actual aggregate Indian production and share of domestic industry in range.
  - vi. The ocean freight considered has been disclosed. There is no allegation that the ocean freight claimed is excessive.
  - vii. Other adjustments to export price have been claimed as per consistent practice of the Authority.
  - viii. The normal value and dumping margin have been disclosed in range, as per the requirements of the Trade Notice. Since the normal value is based on the cost of production of the domestic industry, actual figures cannot be disclosed. The claim of confidentiality has been duly justified in the application.
  - ix. The number of employees were disclosed in trend, and the reasons for confidentiality were duly justified. There is no prejudice to the interested parties as none of their arguments rest on the number of employees.
  - x. The profit and loss, return on capital employed and selling price have been provided in indexed form, as required as per the Trade Notice 10/2018. The same are not required to be provided as trends.
  - xi. The claims of confidentiality over costing information have been justified and is consistent with the practice of the Authority. Wankai itself has claimed its appendices confidential.
  - xii. The names of raw materials have been provided in the application.
  - xiii. The annual reports for Indorama Yarns Private Limited and Reliance Industries Limited have been provided as links. The annual report of IVL Dhunseri Petrochem Industries Private Limited contain business sensitive information of the producers which is not available in public. The confidentiality claimed in this regard has been justified in the application.
  - xiv. Wankai has failed to make timely submissions that the non-confidential version does not have the same number of pages as the confidential version. In case the submissions were made timely, the domestic industry would have appropriately modified the non-confidential version. The comments raised at this stage are to

- delay the investigation only and Wankai has failed to show prejudice caused by different page numbers of the confidential and non-confidential version.
- xv. The domestic industry has inadvertently missed enclosed the Format-X and Format-Y in the non-confidential version of the application. Wankai has not shown prejudice caused to it by such omission and has raised such a claim at a belated stage. Had the argument been raised timely, the domestic industry would have resolved the same.
  - xvi. It is confirmed that the non-confidential version is a replica of the confidential version, except for the certifications and page numbering.

### **E.3. Examination by the Authority**

27. With regard to the confidentiality of the information, Rule 7 of the Anti-dumping Rules provides as follows:

*“Rule 7. Confidential Information - (1) Notwithstanding anything contained in sub-rules (2), (3) and (7) of rule 6, sub-rule (2) of rule 12, sub-rule (4) of rule 15 and sub-rule (4) of rule 17, the copies of applications received under sub rule (1) of rule 5, or any other information provided to the designated authority on a confidential basis by any party in the course of investigation, shall, upon the designated authority being satisfied as to its confidentiality, be treated as such by it and no such information shall be disclosed to any other party without specific authorisation of the party providing such information.*

*(2) The designated authority may require the parties providing information on confidential basis to furnish non confidential summary thereof and if, in the opinion of a party providing such information, such information is not susceptible of summary, such party may submit to the designated authority a statement of reasons why summarisation is not possible.*

*(3) Notwithstanding anything contained in sub-rule (2), if the designated authority is satisfied that the request for confidentiality is not warranted or the supplier of the information is either unwilling to make the information public or to authorise its disclosure in a generalised or summary form, it may disregard such information.”*

28. In view of the submissions made by the interested parties, vide communicated dated 27<sup>th</sup> January 2026, parties were directed to make appropriate disclosures or justify their confidentiality claims. Both the interested parties in the investigation have made further disclosure in response to the directions. Wankai has provided indexed figures for details of capacity, production, and domestic sales, exports and inventories from 2018 to 2024 in Part II of the exporter questionnaire response. The domestic industry has, in response to the directions, disclosed the evidence relied upon for adjustment to ocean freight. Further, the discrepancy with regard to the non-confidential version of the application

not being a replica of the confidential version, with regard to the number of pages, the certificate of accuracy and the certificate from legal representative was resolved. The domestic industry has also confirmed that the names of Indian producers and the names of raw materials have already been disclosed. The domestic industry has provided further justification with regard to the confidentiality claimed, with regard to the remaining allegations of the opposing parties.

29. The interested parties have claimed that the source of import data used must be disclosed. The Authority notes that the applicants have identified the source as market intelligence. However, the Authority has not relied upon the information provided by the interested parties, at the stage of initiation, or in its determination. The Authority has relied upon DG Systems data for its determinations in the present review.
30. The interested parties have claimed that the production of individual producers considered for total Indian production have not been disclosed. In this regard, it is noted that the applicants have shown good cause justifying confidentiality. The applicants have explained that the disclosure of production of other domestic producers would result in disclosure of the production of the domestic industry. Instead, the production of the Indian industry as a whole has been disclosed. Further, the range of share in production by applicants and other domestic producers has been provided. The Authority notes that for part of the period, the domestic industry constituted only two producers. Further, even for the latter two years, two out of three producers constituting the domestic industry are related producers. Thus, if the actual figures are disclosed, it would essentially lead to inter-se disclosure of confidential information within the constituents of the domestic industry. The interested parties have not shown why the information provided is insufficient to allow them to defend their interests, or would not result in disclosure of business sensitive information. In view of the same, the confidentiality claimed in this regard is accepted.
31. The Authority allows confidentiality claims of domestic industry on information such as selling price, number of employees, profit/losses, cash profit, return on investment, costing information with elements of costs, details of shut down and financial statements of one of the applicants, IVL Dhunseri Petrochemicals Industries Private Limited, which are not publicly available. Similarly, the normal value based on elements of cost of production of the domestic industry, and the dumping margin derived thereupon cannot be disclosed on actual basis. However, the Authority notes that the domestic industry has disclosed the information with regard to selling price, number of employees, profit/losses, cash profit, return on investment on indexed basis; and the normal value and dumping margin has been disclosed in range. The Authority considers that this information is confidential by nature and disclosure of such information and document on actual basis can have significant adverse effect on the party concerned and can give undue competitive advantage to competitors and parties with opposing interests. Further, the domestic industry and the other interested parties have not shown any prejudice caused to their interests, due to non-disclosure by the other parties.

32. The information provided by the interested parties on a confidential basis was examined with regards to sufficiency of such claims. On being satisfied, the Authority accepts the confidentiality claims wherever warranted, and such information has been considered confidential and not disclosed to the other interested parties. Wherever possible, the parties providing information on confidential basis were directed to provide sufficient non-confidential version of the information filed on a confidential basis. The Authority also notes that all interested parties have claimed their business-related sensitive information as confidential and the same is considered appropriate.

**F. MISCELLANEOUS**

**F.1. Views of other interested parties**

33. The other interested party has submitted that the petition is deficient and lacks evidence required in the non-confidential version.

**F.2. Views of the domestic industry**

34. The domestic industry has responded that Wankai has failed to highlight any deficiency in the application. In any case, the review was initiated by the Authority after satisfying itself of the adequacy and accuracy of the information submitted.

**F.3. Examination of the Authority**

35. With regard to the contention that the present investigation has been initiated without sufficient evidence on record, the Authority notes that the applicant has provided a duly substantiated application claiming likelihood of continuation or recurrence of dumping and injury in the absence of duties. At the time of initiation of investigation, the Authority prima facie satisfied itself of the need for initiation of sunset review investigation concerning present anti-dumping duties based on the evidence furnished by the domestic industry establishing likelihood of continuation or recurrence of dumping and injury if the present duties are allowed to expire. Further, no evidence has been placed on record by the interested parties to displace the prima facie observations arrived at by the Authority at the stage of initiation.

**G. NORMAL VALUE, EXPORT PRICE AND DUMPING MARGIN**

**G.1. Views of other interested parties**

36. The following submissions have been made by the other interested parties, with reference to determination of normal value, export price and dumping margin.

- i. China must not be considered as a non-market economy as the provisions of Article 15(a)(ii) of the Accession Protocol for China have expired. Normal value must be considered based on domestic prices and costs prevailing in China.
- ii. Even if China is treated as a non-market economy, no efforts have been made by the domestic industry to determine normal value based on alternative methods provided for under Para 7 of Annexure I of the Rules.
- iii. The domestic industry is required to give identify an appropriate market economy third country, and the other interested parties should be put to notice regarding the same.
- iv. Normal value cannot be determined based on price payable in India, in view of the decision in Shenyang Matsushita 2005 (181) ELT 320 (SC)
- v. Wankai has filed the response timely, as per deadline allowed by the Authority.
- vi. Wankai has made almost all its export sales to India directly and only a negligible quantity has been exported through the related trader/exporter, namely Wankai International. Wankai has not exported the subject goods through any unrelated trader/exporter as alleged.
- vii. Certain negligible quantities exported by Wankai International to India were earlier considered as exports to other countries, instead of export to India, due to an oversight at the end of Wankai personnel. This was on account of the recent incorporation of Wankai International in March 2023 and since the trader is located in Singapore.
- viii. The response of the related trader/exporter, Wankai International, was not filed in a manner warranting rejection.
- ix. The findings relied upon by the domestic industry of Pentaerythritol and Axle for Trailers are on different facts, and pertain to a situation where the primary exporter did not participate in time.
- x. Since Authority accepted the anti-absorption investigation after a delay of 7 months, the present delay of only 2 months in filing the response should be condoned.
- xi. The delay in filing response was neither intentional nor deliberate and that inclusion or exclusion of such negligible quantity has no material effect on the export prices.
- xii. Since the investigation is in progress and relevant facts emerge, no inference can be drawn from the response by Wankai International having been filed after hearing.
- xiii. The exports to India are negligible as compared to total exports by Wankai and non-disclosure is not intentional or deliberate. The unreported export transactions are negligible and do not vitiate determination, as held in past findings of Authority, such as in case of Caprolactam, Black Toner, Phenol, Polypropylene, and Vitrified Tiles.
- xiv. The duty applicable to Wankai shall be determined as per its dumping margin, and not whether the duty is low.
- xv. Determination of dumping margin is an exercise of reasonable approximation and not based on mathematical precision.

- xvi. The submissions of domestic industry show an attempt to block exports by Wankai by all means. By contrast, the object of anti-dumping investigation is to restore fair competition.
- xvii. Similar allegations regarding exports through unrelated traders were raised in the earlier anti-absorption investigation, and examined and rejected by the Authority. There is no justification for raising the same issues again in the present review.
- xviii. The Authority may conduct on-site verification of the data submitted by Wankai.
- xix. The domestic industry has not disclosed the source or complete details of the indirect imports. Thus, Wankai is prevented from making meaningful comments, and no adverse inference be drawn should be drawn unless the information is disclosed in accordance with principles of natural justice.
- xx. The domestic industry has provided only selective information regarding alleged exports through unrelated traders, without disclosing the source of such data or the corresponding prices. Since dumping determination is based on prices and not merely on volumes. In absence of disclosure of price information, the allegations of the domestic industry are unsubstantiated.
- xxi. The fact that the domestic industry has not disclosed prices implies that the prices of the alleged indirect exports are at par with or higher than the export price of Wankai.
- xxii. Wankai submits that it would not be in its interest to conceal exports through traders, as such conduct may result in denial of individual treatment and imposition of a higher or residual duty.
- xxiii. Since the issue was already identified in the anti-absorption investigation, it is illogical to suggest that Wankai would again engage in the alleged exports through traders, during the pendency of the current sunset review.
- xxiv. An investigation has already been initiated by the Directorate of Revenue Intelligence into the alleged imports through unrelated traders, which would reveal the factual position in due course.
- xxv. Wankai denies the allegation that an analysis of import volumes and duty applied would reveal that the predominant share of imports has been cleared based on the duty applicable to Wankai.
- xxvi. With regard to the reliance placed by the domestic industry on grade descriptions and sample data, Wankai submits that grade information is in the public domain and mere description of grades does not conclusively establish the identity of the manufacturer.
- xxvii. Wankai has no control over the information provided by third-party importers to Indian Customs, including in respect of certificates of origin or packaging details.
- xxviii. The photographic and videographic evidence, and the Certificates of Origin provided has not been shared with Wankai.
- xxix. Since the Certificate of Origin is not issued by Wankai, it cannot be held accountable for the information provided in it.
- xxx. Since responses covering 100% of exports to India have been provided, the requirement of Manual of Operating Practices has been complied with, and the cases relied upon by the domestic industry are not applicable.

## **G.2. Views of the domestic industry**

37. The domestic industry has submitted as follows with reference to determination of normal value, export price and dumping margin.
- i. China PR should be considered a non-market economy. On 11<sup>th</sup> December 2016, only the provisions of Article 15(a)(ii) expired, and the provisions of Article 15(a)(i) continue to remain in force, which permit China PR to be considered a non-market economy.
  - ii. The Authority has consistently considered China to be a non-market economy in all recent findings, post 2016.
  - iii. In view of the failure of foreign producers to demonstrate that they are operating under market economy conditions, the normal value should be determined as per Para 7.
  - iv. The interested parties have failed to show that domestic industry is required to propose an appropriate market economy third country. The other interested parties are equally free to propose.
  - v. The domestic industry has determined normal value based on information reasonably available to it. Information with regard to prices and costs in third countries was not available to it. Further, the product does not have a dedicated tariff code.
  - vi. The interested parties have failed to show that there was alternative information available, which the domestic industry could have provided.
  - vii. Reliance on the decision of *Shenyang Matsushita S. Battery Co. Ltd. V. Exide Industries* is not appropriate, since it relates to determination of market economy status under Para 8 of the Anti-Dumping Rules.
  - viii. The individual duty quantum given to Wankai must be withdrawn. It has deliberately misrepresented facts leading to incomplete value chain not being available.
  - ix. Response filed by Wankai is belated considering the 30-day deadline prescribed under the initiation notification.
  - x. The response filed by Wankai International PTE Ltd. has been filed 68 days after the deadline. The information is delayed and must be disregarded, as done in the investigations into Pentaerythritol and Axle for Trailers.
  - xi. The response filed by Wankai International PTE Ltd was not filed voluntarily and was filed only after the submissions made by the domestic industry during the oral hearing. Even after the response filed by Wankai International, the traders accounting for majority of exports have not filed a response. Thus, the information required for determination of dumping margin and injury margin is not available before the Authority.
  - xii. Merely because Wankai International is a new entity, it does not imply that the exports by the entity can go unnoticed.
  - xiii. Contrary to claim of the interested parties, determination of dumping margin is not an exercise of reasonable approximation. Such a statement is an attempt by the

party to understate the gravity of its own omission. Further, such a statement implies that any producer can claim an individual duty rate by abiding to an extremely low standard of accuracy unsupported by verifiable evidence. This undermines the efforts made by the domestic producers and other interested parties to provide accurate and verifiable information to the Authority.

- xiv. Even though the domestic industry highlighted the fact of exports by Wankai International vide submissions dated 4<sup>th</sup> December 2025, the exporter did not furnish a response. Instead, Wankai continued to claim that it had only exported directly.
- xv. Since a related exporter did not file response timely, an individual duty rate cannot be conferred on Wankai. This is in line with position stated in the Manual of Operating Practices and the view taken in the recent preliminary findings in the case of Met Coke.
- xvi. Contrary to claims of Wankai, the response cannot be accepted even if a small volume is exported through the related exporter. As regards the findings relied upon by Wankai, the same relate to a situation of non-cooperation by unrelated exporters, and not related exporters.
- xvii. Only 36% of exports of Wankai products are direct exports. Remaining 66% of exports have been made by unrelated traders, which have not participated. Thus, response by Wankai must be rejected.
- xviii. The product descriptions of the imports not only mention the grade name of Wankai, but clearly identify Wankai as the manufacturer of the products.
- xix. The Customs authorities have recognised such imported products as having produced by Wankai and thereafter, accepted a lower anti-dumping duty.
- xx. The Customs Manual require the details of the manufacturer to be mandatorily provided on importation of goods, if the product attracts anti-dumping duty.
- xxi. The subject goods bear the name of the manufacturer on the packaging material.
- xxii. Such products have been imported at lower ant-dumping duty, after verification by Customs authorities that they have been produced by Wankai.
- xxiii. The Certificate of Origin for exports identifies the manufacturer, as seen from the sample Certificate of Origin provided as evidence on record. Thus, the Authority must call for Certificates of Origin for transactions exported by non-cooperative exporters, which have been cleared at lower duties applicable to Wankai.
- xxiv. The process of issuance of Certificate of Origin in China includes verification by Chinese Authorities, of records of manufacturer, including their capacity, production process, origin of raw material, finished products, etc. for place of origin. Further, the recent Measures for Certificate of Origin in China also mandate exporters and manufacturers to retain supporting materials proving the origin of export goods for three years from issuance of certificate.
- xxv. The established procedures and regulations in both countries mandate the details of manufacturers to be verified, demonstrating that the goods were produced by Wankai.
- xxvi. Wankai was well aware that the goods produced by it were being exported to India.

- xxvii. Even in the normal course of business, products are stuffed into containers on factory premises and moved to the port from the plant of the producer. Thus, it is not possible for Wankai to not know its exports to India.
- xxviii. Since Wankai is required to report all its exports to India, and it was aware that subject goods produced by it have been exported under certificate of origin, it should have made efforts to identify the country of import and adequately report the information to the Authority.
- xxix. Wankai had exported the subject goods through a related exporter as well, but failed to provide information in this regard till 2 months after the deadline.
- xxx. Since exports through unrelated exporters which have not been reported, form a significant share of total exports from Wankai, Wankai must not be considered as cooperative. This is consistent with settled practice of the Authority, as per the Manual of Operating Practices, and as seen in various findings, including Uncoated Copier Paper from Indonesia and Singapore, and New pneumatic radial tyres of rubber for buses and lorries, with or without tubes and/or flaps.

### **G.3. Examination by the Authority**

38. Under section 9A(1)(c), the normal value in relation to an article means:

*“i) The comparable price, in the ordinary course of trade, for the like article, when meant for consumption in the exporting country or territory as determined in accordance with the rules made under sub-section (6), or*

*ii) when there are no sales of the like article in the ordinary course of trade in the domestic market of the exporting country or territory, or when because of the particular market situation or low volume of the sales in the domestic market of the exporting country or territory, such sales do not permit a proper comparison, the normal value shall be either:*

*(a) comparable representative price of the like article when exported from the exporting country or territory or an appropriate third country as determined in accordance with the rules made under sub-section (6); or*

*the cost of production of the said article in the country of origin along with reasonable addition for administrative, selling and general costs, and for profits, as determined in accordance with the rules made under sub-section (6);*

*(b) Provided that in the case of import of the article from a country other than the country of origin and where the article has been merely transshipped through the country of export or such article is not produced in the country of export or there is no comparable price in the country of export, the normal value shall be determined with reference to its price in the country of origin.”*

39. The Authority notes that only Wankai New Materials Co. Ltd. (Wankai) has filed exporter’s questionnaire response. The domestic industry contended that the response was filed after the deadline. However, the Authority notes that the response has been filed, within the extended time allowed, on 10<sup>th</sup> November 2025. Further, on 13<sup>th</sup> January

2026, which is beyond the deadline for filing responses, Wankai has furnished a response for its related trader, Wankai International Pte Ltd.

#### **G.4. Determination of Normal value and Export Price**

##### **G.4.1. Normal value**

40. Article 15 of the China's Accession Protocol to the WTO provides as follows:

*“Article VI of the GATT 1994, the Agreement on Implementation of Article VI of the General Agreement on Tariffs and Trade 1994 (“Anti-Dumping Agreement”) and the SCM Agreement shall apply in proceedings involving imports of Chinese origin into a WTO Member consistent with the following:*

*In determining price comparability under Article VI of the GATT 1994 and the Anti-Dumping Agreement, the importing WTO Member shall use either Chinese prices or costs for the industry under investigation or a methodology that is not based on a strict comparison with domestic prices or costs in China based on the following rules:*

*(i) If the producers under investigation can clearly show that market economy conditions prevail in the industry producing the like product with regard to the manufacture, production and sale of that product, the importing WTO Member shall use Chinese prices or costs for the industry under investigation in determining price comparability;*

*(ii) The importing WTO Member may use a methodology that is not based on a strict comparison with domestic prices or costs in China if the producers under investigation cannot clearly show that market economy conditions prevail in the industry producing the like product with regard to manufacture, production and sale of that product.*

*In proceedings under Parts II, III and V of the SCM Agreement, when addressing subsidies described in Articles 14(a), 14(b), 14(c) and 14(d), relevant provisions of the SCM Agreement shall apply; however, if there are special difficulties in that application, the importing WTO Member may then use methodologies for identifying and measuring the subsidy benefit which take into account the possibility that prevailing terms and conditions in China may not always be available as appropriate benchmarks. In applying such methodologies, where practicable, the importing WTO Member should adjust such prevailing terms and conditions before considering the use of terms and conditions prevailing outside China.*

*The importing WTO Member shall notify methodologies used in accordance with subparagraph (a) to the Committee on Anti-Dumping Practices and shall notify*

*methodologies used in accordance with subparagraph (b) to the Committee on Subsidies and Countervailing Measures.*

*Once China has established, under the national law of the importing WTO Member, that it is a market economy, the provisions of subparagraph (a) shall be terminated provided that the importing Member's national law contains market economy criteria as of the date of accession. In any event, the provisions of subparagraph (a)(ii) shall expire 15 years after the date of accession. In addition, should China establish, pursuant to the national law of the importing WTO Member, that market economy conditions prevail in a particular industry or sector, the non-market economy provisions of subparagraph (a) shall no longer apply to that industry or sector.”*

41. The domestic industry has cited and relied upon Article 15(a)(i) of China's Accession Protocol. The domestic industry has claimed that producers in China PR must be asked to demonstrate that market economy conditions prevail in their industry producing the like product with regard to the manufacturing, the production and the sale of the product under consideration. It has been stated by the domestic industry that in case the responding Chinese producers are not able to demonstrate that their costs and price information are market-driven, the normal value should be calculated in terms of provisions of Para 7 and 8 of Annexure- I to the Rules. The applicants have claimed that the normal value should be determined on the basis of price payable in India.
42. The interested parties have claimed that normal value cannot be determined as per Para 7 for China, as the provisions contained in Article 15(a)(ii) have expired. It is noted that while such provisions have expired, the provision under Article 2.2.1.1 of WTO, read with obligation under 15 (a) (i) of the Accession Protocol require the criterion stipulated in Para 8 of the Annexure I of the Rules to be satisfied through the information/data to be provided in the supplementary questionnaire on claiming the market economy status. Further, Wankai, the only participating producer, has not claimed market economy treatment. Based on the criterion stipulated in Para 8 of Annexure I, its unfulfillment and the failure of the exporter to furnish a market economy questionnaire response, the Authority concludes that market economy treatment cannot not be granted in the present case.
43. Accordingly, the normal value has been determined in accordance with paragraph 7 of Annexure I of the Rules which state as follows.

*“In case of imports from non-market economy countries, normal value shall be determined on the basis of the price or constructed value in the market economy third country, or the price from such a third country to other countries, including India or where it is not possible, or on any other reasonable basis, including the price actually paid or payable in India for the like product, duly adjusted if necessary, to include a reasonable profit margin. An appropriate market economy*

*third country shall be selected by the designated authority in a reasonable manner, keeping in view the level of development of the country concerned and the product in question, and due account shall be taken of any reliable information made available at the time of selection. Accounts shall be taken within time limits, where appropriate, of the investigation made in any similar matter in respect of any other market economy third country. The parties to the investigation shall be informed without any unreasonable delay the aforesaid selection of the market economy third country and shall be given a reasonable period of time to offer their comments.”*

44. The other interested parties have stated that the normal value must be determined in accordance with the alternatives provided under Para 7. In this regard it has been claimed that the domestic industry has not made efforts to calculate normal value using alternative methods and that it is required to identify and notify other parties of an appropriate market economy third country for calculation of normal value.
45. It is noted that Para 7 lays down hierarchy for determination of normal value and provides that normal value shall be determined on the basis of price or constructed value in a market economy third country, or the price from such a third country to any other country, including India, or where it is not possible, on any reasonable basis, including the price actually paid or payable in India for the like article, duly adjusted, if necessary, to include a reasonable profit margin. The domestic industry has claimed that it did not have access to alternative basis for determination of normal value, since information regarding prices and costs in other countries is confidential. It is noted that while the interested parties have claimed that the domestic industry should have provided alternative information, they have themselves not suggested any alternative means for determination of normal value. Further, the interested parties have not shown that alternative information was available that the domestic industry could have provided. Since all interested parties, including domestic industry, have not provided any information on record which would allow determination of normal value based on price or constructed value in a market economy third country, or price of exports from a third country to other countries, including India. Accordingly, the Authority has determined normal value based on the price payable in India, having regard to the cost of production of the applicant, duly adjusted for selling, general and administrative expenses and reasonable profits.

#### **G.4.2. Export price**

##### **Export price for Wankai New Materials Co. Ltd.**

46. In the response filed, Wankai New Materials Co. Ltd. (Wankai) claimed that it had only exported the product under consideration to India directly. The Authority issued it a supplemental questionnaire, asking for, inter alia, information regarding its channel of distribution. In response to the supplemental questionnaire dated 29<sup>th</sup> December 2025, Wankai maintained that it had only exported the product under consideration to India directly. However, thereafter, after oral hearing, and the was pointed out by the domestic

industry, vide letter dated 13<sup>th</sup> January 2026, Wankai has furnished a response in respect of Wankai International Pte Ltd (Wankai International). Wankai has claimed that the personnel of Wankai, due to some confusion and by oversight, did not notice the negligible volume of export sales to Wankai International, especially since the trader is located in Singapore and was incorporated in March 2023 only.

47. The domestic industry vide letter dated 4<sup>th</sup> December 2025 highlighted that Wankai had failed to furnish a response in respect of its subsidiary, Wankai International Pte Ltd., which is engaged in exporting the subject goods produced by Wankai to India. Therefore, the domestic industry sought rejection of response filed by Wankai. Thereafter, in its written submissions, the domestic industry emphasized that the response filed by Wankai cannot be accepted, since traders accounting for almost 66% of the exports to India have not cooperated with the Authority. In support of their contention, the domestic industry has, inter alia, provided the following evidence, which has been considered by the Authority.
- a. Import data showing descriptions of transactions specifically identifying Wankai as the manufacturer of the product under consideration. As emphasized by the domestic industry, the import descriptions do not merely bear the grade name, as claimed by Wankai, but specifically identify that Wankai was the manufacturer.
  - b. Sample Certificates of Origin issued by China Council for the Promotion of International Trade (CCPIT), which falls under the Ministry of Commerce of China. The Authority notes that these Certificates show that Wankai was the manufacturer of the goods exported to India. However, the goods have been exported by exporters, not cooperating in the present investigation.
  - c. Indian Customs Manual, which shows that the Indian Customs verifies the manufacturer of the imported goods, where anti-dumping duty is applicable on such imports.
  - d. The Regulations (Measures) applicable in China governing the procedure for issuance of Certificates of Origin. These Measures provide that authorities may verify origin by “*conducting on-site inspections of production equipment, processes, materials, packaging, marks, and other origin-related information*”.
48. The Authority has also examined the anti-dumping duty paid on the imports into India from various exporting parties. It is noted that the subject goods imported into India are being cleared at the individual duty rate applicable to Wankai. The Authority has sought appropriate confirmation in this regard from the Indian Customs authorities. The Authority has also examined the DG Systems data. It has been noted that there are multiple transactions bearing the name of Wankai or grade name of Wankai during the period of investigation. In fact, out of 1,447 transactions during the period of investigation, 1,229 transactions bear the grade name of Wankai or specifically refer to Wankai or identify Wankai as the manufacture. It is noted that the volume of imports bearing the name or grade name of Wankai, but having been exported through non-cooperating exporters, constitute 65-75% of exports by Wankai.

49. Wankai has denied these allegations and insisted that it has only exported the subject goods directly, and through Wankai International. Further, Wankai claimed since the domestic industry did not disclose the source of import data used, and the Certificates of Origin, it was precluded from commenting on it. Wankai continues to insist that it does not have control over the use of its grade names by traders, or by parties seeking issuance of Certificates of Origin in its name. Wankai has heavily relied upon the previous anti-absorption investigation and the fact that a DRI investigation has been initiated into the imports. However, Wankai has not submitted any evidence to support its claim that it was unaware of these transactions. For instance, Wankai has not refuted the procedural requirements under the Indian Customs law, and under the Chinese Measures, both of which require that the manufacturer of the import transactions be identified. Wankai has also not shown that it made efforts to ascertain facts regarding the said transactions, in order to bring the correct facts before the Authority.
50. The Authority notes that Wankai has claimed that the transactions through unrelated parties did not pertain to its manufactured products in the present review. However, before the Customs authorities, the transactions have been presented as having been manufactured by Wankai. The Authority finds that Wankai and the traders cannot be allowed to take diametrically opposite position before two different authorities in India. Since at the stage of import, the goods were claimed to have been produced by Wankai, and the Indian Customs have cleared the goods after due verification, relying on Certificate of Origin or other documents, no reason has been shown for a different view to be taken in the present matter. If Wankai was allowed to take an opposite view in the present case, it would result in a situation where parties are able to take different views before different Indian authorities, based on the maximum benefit to itself.
51. The Authority particularly notes that issuance of Certificate of Origin requires identification of the source of the product, or manufacturer. Further, the records of the manufacturer may be verified to ensure that the goods being certified as originating in the exporting country have indeed been manufactured, and are not merely traded or transshipped. The regulations placed on record by the domestic industry shows that the issuing authorities in China may conduct on-site verification of the premises of the manufacturer. In any case, the Certificates of Origin have been issued by China Council for the Promotion of International Trade (CCPIT), which is under the Ministry of Commerce of China. Since the issuing Authority CCPIT has issued Certificate confirming that Wankai was the manufacturer of the exported product, the Authority does not find the contention of Wankai that it did not manufacture the goods persuasive. The Authority notes that it shall rely on the Certificates issued by the regulatory authorities in China in this regard, to confirm that Wankai manufactured goods have indeed been exported to India by other parties.
52. The Authority further traced the Certificates of Origin supplied by the domestic industry to the DG Systems. It is noted that Certificate No. \*\*\* was issued in respect of Invoice No. \*\*\* dated \*\*\*. The Authority notes that such invoice has been cleared under HS

Code 39076190, vide Bill of Entry No. \*\*\* dated \*\*\*. The description for the imported product reads as “\*\*\*\*”. The Authority also examined the anti-dumping duty paid on such imported transaction and found that the anti-dumping duty applicable on Wankai has been paid at the stage of import. Likewise, the Certificate No. \*\*\* was issued in respect of Invoice No. \*\*\* dated \*\*\*. Such invoice was cleared under HS Code 39076990, vide Bill of Entry \*\*\* dated \*\*\* at the anti-dumping duty applicable on Wankai. The description of the imported product reads “\*\*\*\*”. This demonstrates that the goods imported under the Certificates of Origin issued in the name of Wankai have actually been imported into India, and have been cleared under the lower duty rate applicable to Wankai.

53. The Authority also notes that Wankai had initially denied exporting through any trader at all. However, once the fact of exports was highlighted in oral hearing, it furnished a response for the related trader, Wankai International. Wankai dismisses the delay claiming that it is an ongoing investigation, and relevant facts emerge as the investigation proceeds. However, the domestic industry had already highlighted the fact of exports through Wankai International vide letter dated 4<sup>th</sup> December 2025. The submissions filed by Wankai do not explain the reason it did not seek permission from Authority to furnish a response for Wankai International on perusing the submissions of the domestic industry. On the contrary, even in its reply to supplemental dated 29<sup>th</sup> December 2025, Wankai maintained that it had not exported to any third party. The additional delay of more than 2 months has not been justified by Wankai at any place. Further, even now, Wankai has not requested to be allowed to furnish a response at such belated stage, but has simply filed the response.
54. Wankai also claims that it does not have any incentive to conceal the exports through traders. It also claims that had it engaged in such exports through traders, it would have refrained from engaging in such exports subsequent to the issue being highlighted in the anti-absorption investigation. However, the Authority notes that the non-disclosure of the exports through traders allows Wankai to claim an individual duty rate, without ensuring that all exporters forming part of the channel of distribution cooperate to furnish the required information. Further, in the anti-absorption investigation, the Authority accepted the contention of Wankai that products imported under its grade name were not produced by Wankai. However, Wankai has not shown that it took any steps to ensure that the goods were no longer being exported to India through traders, under its name. Further, no inference can be drawn from the fact that exports through traders continue, since Wankai may have assumed that the Authority shall continue to take the same position as taken in the anti-absorption investigation.
55. The arguments of Wankai also heavily emphasize the fact that the domestic industry has not disclosed the prices of the alleged indirect exports, implying that the prices must be higher. However, the argument cannot be accepted, since the issue is not whether the margin should be higher or lower, but whether the value chain is complete.

56. As regards the DRI investigation, the Authority believes that the same is only at an investigation stage, and there is no reason to conclude that the DRI shall find that the goods imported were not produced by Wankai.
57. Therefore, in view of the foregoing, the Authority notes that Wankai has failed to provide adequate and accurate information before the Authority. The information furnished is incomplete in material respects, since specific directions were given in the questionnaire advising that where exports are made through an exporter, the exporter must furnish response to Part-I and Part-II, as well as Appendix 5. The consistent practice of the Authority requires that unrelated traders must cooperate in the investigation, failing which an individual duty shall not be allowed. In the present case, traders accounting for a significant share of the exports to India have not cooperated with the Authority. In view of the same, the Authority concludes that Wankai shall be treated as non-cooperative in the present investigation.

**Export price for all producers/exporters in China PR**

58. The export price for all other non-cooperating producers and exporters of China has been determined based on facts available and the same is mentioned in the dumping margin table below.

**Dumping margin**

59. Considering the normal value constructed as provided above, and export price as determined, the dumping margin determined for the subject country is as follows:

**Dumping Margin Table**

SN	Name of Producer	Normal Value	Export Price	Dumping Margin	Dumping Margin	Dumping Margin
		(USD/MT)	(USD/MT)	(USD/MT)	(%)	(Range)
1	Any	***	809	***	***	20-30%

**H. ASSESSMENT OF INJURY AND CAUSAL LINK**

**H.1. Views of other interested parties**

60. The following submissions have been made by the other interested parties with regard to injury and causal link:
- a. The imports from Wankai have increased due to the demand for its products.
  - b. The domestic industry has not faced any injury due to the subject imports as the prices of the subject goods have remained unchanged, even though the prices of PTA and MEG have declined.

- c. The price undercutting is same as price underselling, implying selling price is equal or more than non-injurious price, showing no injury.
- d. The production, capacity and sales of the domestic industry have increased. The capacity utilization has declined, due to increase in capacity.
- e. The profitability of the domestic industry has declined due to increase in depreciation and interest.
- f. The detailed reasons for plant shut down have not been provided. It is understood that shutdowns by the domestic industry are unplanned and abnormal, thereby causing losses.

## **H.2. Views of the domestic industry**

61. The following submissions have been made by the domestic industry with regard to the injury and causal link:
- a. The low duty applicable on Wankai has allowed it to continue to export significant volumes in India, equivalent to the volumes imposed in the period of investigation of the original investigation.
  - b. Imposition of anti-dumping duty has been successful in preventing dumped imports from the subject country from causing injury to the domestic industry. However, there is a need to examine the likelihood of continuation of dumping and consequent injury to the domestic industry.
  - c. Contrary to the submissions filed by the other interested parties, the domestic industry has not claimed injury in the present investigation. The domestic industry has provided information with regard to shut down faced and the same may be examined.
  - d. As opposed to the submissions by the other interested parties, the prices of PTA and MEG have increased over the injury period, however, the selling price of the domestic industry has declined.
  - e. Price underselling is much higher than the price undercutting in the present case. Thus, despite anti-dumping duty in force, the domestic industry has not been able to sell its product at the level of non-injurious price.
  - f. The profitability of the domestic industry has not declined due to increase in depreciation and interest cost as the EBIDTA of the domestic industry has also declined.

## **H.3. Examination by the Authority**

62. The Authority has examined the arguments and counter-arguments of the interested parties with regard to injury, causal link and likelihood of continuation of dumping and injury to the domestic industry in case of expiry of anti-dumping duty. The analysis made by the Authority hereunder addresses the various submissions made by the interested parties.

63. The other interested parties have submitted that the losses to the domestic industry is due to unplanned shutdowns. The Authority notes that the domestic industry has not suffered losses in the period of investigation. In any case, the Authority has examined the information regarding shut downs faced by the domestic industry, and does not find that there have been any abnormal shutdowns requiring adjustment to cost of production.
64. The Authority notes that in the present investigation the domestic industry has not claimed injury during the period of investigation due to imports of subject goods from the subject country. The domestic industry has submitted that there is a need for continuation of anti-dumping duty as there is a likelihood of continuation or recurrence of dumping and consequent injury to the domestic industry in case of expiry of the present anti-dumping duty in force.

### **H.3.1. Volume effect of the dumped imports**

#### **a) Assessment of demand / apparent consumption**

65. The Authority, for the purpose of the present investigation, has defined demand or apparent consumption of the product in India as the sum of domestic sales of the Indian producers and imports from all sources. The demand so assessed is given in the table below.

Particulars	Unit	2021-22	2022-23	2023-24	2024-25
Sales of domestic industry	MT	***	***	***	***
Trend	Indexed	100	123	133	141
Captive consumption	MT	***	***	***	***
Trend	Indexed	100	72	57	55
Sales of other producers	MT	***	***	***	***
Trend	Indexed	100	107	103	158
Imports from subject country	MT	23,142	50,213	2,13,784	1,99,704
Imports from other countries	MT	69,309	59,958	80,692	95,701
Demand including captive	MT	12,23,681	14,75,878	17,47,192	19,21,748
Demand excluding captive	MT	12,23,372	14,75,654	17,47,017	19,21,578

66. The Authority notes that the demand for the subject goods in India has increased year on year over the injury period. There has been an increase by 57% in the demand for the subject goods across the injury period.

#### **b) Import Volumes from the subject country**

67. With regard to the volume of the imports, the Authority is required to consider whether there has been a significant increase in imports, either in absolute terms or relative to

production or consumption in India. The import volumes from subject country during the injury period was as follows:

Particulars	Unit	2020-21	2021-22	2022-23	POI
Imports from subject country	MT	23,142	50,213	2,13,784	1,99,704
Imports from other countries	MT	69,309	59,958	80,692	95,701
Total Imports	MT	92,451	1,10,171	2,94,476	2,95,405
Indian production	MT	17,97,465	18,25,971	17,50,498	19,32,656
Indian consumption	MT	12,23,681	14,75,878	17,47,192	19,21,748
Subject imports in relation to					
Indian Production	%	1.29%	2.75%	12.21%	10.33%
Consumption/Demand	%	1.89%	3.40%	12.24%	10.39%
Total imports	%	25.03%	45.58%	72.60%	67.60%

68. The Authority notes that:

- i. The volume of imports from the subject country has increased substantially over the injury period.
- ii. While the volume of imports has declined in the period of investigation as compared to the previous year, it is still 9 times the volume in 2020-21. It is also noted that the present period of investigation saw an increase in the quantum of duty applicable to the producer, Wankai, which may have resulted in the slight decline in imports. However, imports volumes continue to remain significant.
- iii. The domestic industry has also highlighted that the present import volumes are not materially lower than the import volumes in the original investigation period, which were at 2,42,638 MT.
- iv. Imports in relation to production and consumption in India have also increased significantly over the injury period, registering a slight decline in the period of investigation compared to the previous year.
- v. In a situation where the Indian industry already has sufficient capacity to cater to the Indian demand, the subject imports continue to account for more than 10% of the consumption.
- vi. While the subject imports accounted for 24% of the total imports into India in 2020-21, the share of subject imports has increased, and they account for majority of the share in total imports.

### **H.3.2. Price effect of the dumped imports**

69. With regard to the price effect of the imports from the subject country, it is required to be analysed whether there has been a significant price undercutting by the alleged imports as compared to price of the like article in India, or whether the effect of such imports is otherwise to depress prices or prevent price increases, which otherwise would have occurred in the normal course. The impact on the prices of the domestic industry on

account of the imports from the subject country has been examined with reference to price undercutting, price suppression and price depression, if any.

**a) Price undercutting**

70. For the purpose of price undercutting analysis, the selling price of the domestic industry has been compared with the landed price of imports from subject country. In this regard, a comparison has been made between the landed value of the product and the average selling price of the domestic industry, net of all rebates and taxes, at the same level of trade.

Particulars	Unit	POI
Net sales realization	₹/MT	***
Landed price	₹/MT	84,473
Price undercutting	₹/MT	***
Price undercutting	%	***
Price undercutting	Range	0-10%

71. The Authority notes that the subject imports are priced below the selling price of the domestic industry. Since the anti-dumping duty is in force at present, it is unlikely that such price difference created a strain on the prices of the domestic industry, since the duty-inclusive price was higher than the price of the domestic industry. However, the imports are likely to undercut the prices of the domestic industry in the market in the event of cessation of anti-dumping duty.

**b) Price suppression/depression**

72. In order to determine whether the dumped imports are depressing the domestic prices to a significant degree or whether the effect of such imports is to suppress price to a significant degree or prevent price increase which otherwise would have occurred in normal course, the Authority has examined the changes in the costs and prices of the domestic industry over the injury period.

Particulars	Unit	2020-21	2021-22	2022-23	POI
Cost of sales	₹/MT	***	***	***	***
Trend	Indexed	100	112	107	105
Selling price	₹/MT	***	***	***	***
Trend	Indexed	100	105	93	93
Landed price	₹/MT	84,830	88,189	85,247	84,473
Trend	Indexed	100	104	100	100

73. The Authority notes that while the cost of sales of the domestic industry has increased, the selling price has declined over the injury period. The domestic industry has not been able to price its product based on its cost. This is a result of the increase in imports at lower prices over the injury period. Therefore, the imports have depressed the prices of the domestic industry, and prevented price increases, which otherwise would have occurred.

**H.3.3. Economic parameters of the domestic industry**

74. Annexure II to the Anti-Dumping Rules require that the determination of the injury shall involve an objective examination of the consequent impact of dumped imports on the domestic producers of the subject goods. With regards to the consequent impact of these imports on the domestic producers of subject goods, the Rules further provide that the examination of the impact of the dumped imports on the domestic industry would include an objective unbiased evaluation of all relevant economic factors and indices having a bearing on the state of the industry, including actual and potential decline in sales, profits, output, market share, productivity, return on investments or utilization of capacity; factors affecting domestic prices, actual and potential negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital investments. Accordingly, performance of the domestic industry has been examined over the injury period.

**a) Production, capacity, capacity utilization and sales volumes**

75. The performance of the domestic industry with regard to capacity, production, sales and capacity utilization over the injury period was as below:

Particulars	Unit	2021-22	2022-23	2023-24	2024-25
Installed Capacity	MT	***	***	***	***
Trend	Indexed	100	100	115	118
Total Production	MT	***	***	***	***
Trend	Indexed	100	100	96	102
Capacity utilization	%	***	***	***	***
Trend	Indexed	100	100	84	86
Domestic Sales	MT	***	***	***	***
Trend	Indexed	100	123	133	141
Export sales	MT	***	***	***	***
Trend	Indexed	100	69	45	45
Captive consumption	MT	***	***	***	***
Trend	Indexed	100	72	57	55

76. The Authority notes that the installed capacity, production and domestic sales of the domestic industry have increased over the injury period. Further, while the capacity utilization has declined over the injury period, the domestic industry is operating at a relatively high capacity utilization.

**b) Market share**

77. Market share of the imports and domestic industry is given in the table below:

Particulars	Unit	2020-21	2021-22	2022-23	POI
Domestic industry	%	***	***	***	***
Trend	Indexed	100	102	93	90
Other Indian producers	%	***	***	***	***
Trend	Indexed	100	88	72	100
Subject imports	%	2%	3%	12%	10%
Other imports	%	6%	4%	5%	5%

78. The Authority notes that the market share of the domestic industry has declined over the injury period. By contrast, the subject imports have gained market share over the injury period. During the period of investigation, the market share of subject imports has declined, while that of Indian industry has increased. However, on an overall basis, the Indian industry has lost market share to the subject imports over the injury period.

**c) Inventories**

79. Inventory position of the domestic industry over the injury period is given in the table below:

Particulars	Unit	2020-21	2021-22	2022-23	POI
Opening Inventory	MT	***	***	***	***
Closing Inventory	MT	***	***	***	***
Average Inventory	MT	***	***	***	***
Trend	Indexed	100	96	97	105

80. The Authority notes that the inventories of the domestic industry have increased slightly over the injury period, but they have remained more or less stable throughout the injury period.

**d) Profitability, cash profits and return on capital employed**

81. Profits, cash profits and return on capital employed of the domestic industry over the injury period is given in the table below:

Particulars	Unit	2020-21	2021-22	2022-23	POI
Cost of sales	₹/MT	***	***	***	***
Trend	Indexed	100	112	107	105
Selling price	₹/MT	***	***	***	***
Trend	Indexed	100	105	93	93
Profit / (loss)	₹/MT	***	***	***	***
Trend	Indexed	100	56	-0	9
Profit / (loss)	₹ Lacs	***	***	***	***
Trend	Indexed	100	70	-1	13
Cash profits	₹ Lacs	***	***	***	***
Trend	Indexed	100	72	7	19
Return on capital employed	%	***	***	***	***
Trend	Indexed	100	58	9	17

82. The Authority notes that:

- i. The profitability of the domestic industry declined till 2022-23 and improved thereafter in the period of investigation. The domestic industry incurred losses in 2022-23. The decline in profitability was due to absorption of anti-dumping duty by Wankai. The profitability of the domestic industry has improved post imposition of higher quantum of anti-dumping duty on imports from Wankai as a result of anti-absorption investigation.
- ii. On an overall basis, the profitability of the domestic industry has declined over the injury period.
- iii. The cash profits and return on capital employed of the domestic industry has followed the same trend. The cash profit and return on capital employed declined till 2022-23 and increased thereafter. However, both cash profit and return on capital employed have remained lower than that in 2020-21.
- iv. While the profitability of the domestic industry has increased as compared to the previous year, the situation of the domestic industry is fragile.

83. The other interested parties have submitted that the profitability of the domestic industry has declined due to increase in interest and depreciation cost. The Authority notes that the decline in profitability is not on account of interest and depreciation cost as the EBIDTA, which does not include the impact of interest and depreciation, of the domestic industry has declined.

Particulars	Unit	2021-22	2022-23	2023-24	2024-25
EBIDTA	₹/MT	***	***	***	***
Trend	Indexed	100	63	14	21
EBIDTA	₹ lakhs	***	***	***	***
Trend	Indexed	100	78	19	30

**e) Employment, productivity and wages**

84. The Authority has examined the information relating to employment, wages and productivity, as given below:

Particulars	Unit	2020-21	2021-22	2022-23	POI
Employees	Nos.	***	***	***	***
Trend	Indexed	100	104	102	95
Productivity per day	MT/Day	***	***	***	***
Trend	Indexed	100	102	98	102
Productivity per employee	MT/Nos	***	***	***	***
Trend	Indexed	100	98	96	108
Wages	₹ Lakhs	***	***	***	***
Trend	Indexed	100	106	115	99

85. The Authority notes that the number of employees as well as wages of the domestic industry have declined over the injury period. The productivity of the domestic industry has, however, increased with the increase in production.

**f) Growth**

Particulars	Unit	2020-21	2021-22	2022-23	POI
Installed Capacity	%	-	-	15%	3%
Production	%	-	0%	-4%	6%
Domestic sales	%	-	23%	8%	6%
Profit / (loss) per unit	%	-	-44%	-101%	2,021%
Cash profits	%	-	-28%	-91%	185%
Return on capital employed	%	-	-24%	-28%	5%

86. The Authority notes the domestic industry has increased its installed capacity in 2022-23 and the period of investigation. While the production of the domestic industry decline in 2022-23, it has increased in the period of investigation. The sales of the domestic industry have increased year on year in the injury period. The profitability parameters of the domestic industry witnessed a decline in 2021-22 and 2022-23 due to absorption of anti-dumping duty on Wankai. However, the same have recovered slightly in the period of investigation.

**g) Factors affecting prices**

87. During the present period of investigation, the Authority notes that while the landed price is below the selling price of the domestic industry; the duty-inclusive price is above the price of the domestic industry. Further, the domestic industry has witnessed an improvement in its profitability. The sales volumes of the domestic industry have also improved. Therefore, the imports have not impacted the prices of the domestic industry during the period of investigation.

**h) The magnitude of dumping**

88. The Authority notes that the subject goods are being dumped in India from the subject country even after imposition of anti-dumping duty. The dumping margin is positive and significant.

**i) Ability to raise capital investments**

89. The Authority notes that the profitability of the domestic industry declined significantly in 2022-23 and has recovered slightly in the period of investigation. Since the domestic industry remains in a fragile position, the ability of the domestic industry to raise capital investment may be impacted in absence of duty.

**I. LIKELIHOOD OF CONTINUATION OR RECURRENCE OF DUMPING AND INJURY**

**I.1. Views of other interested parties**

90. The following submissions have been made by the other interested parties with regard to likelihood of continuation or recurrence of dumping and injury:

- a. There is no likelihood of dumping and injury and that of increased imports by Wankai.
- b. Wankai has not engaged in dumping that caused injury to the domestic industry.
- c. Trade remedial measures used by other countries, will not close those countries for China PR as exports to such countries are regular.
- d. There is no basis to assume that any excess capacity will be exported to India in case of cessation of duties.
- e. India is not a price attractive market, as Wankai is getting higher prices in other countries, which may be verified by the information provided on record.
- f. If no duty is applicable to Wankai, it would export the subject goods, as per demand thereof.

**I.2. Views of the domestic industry**

91. The following submissions have been made by the domestic industry with regard to likelihood of continuation or recurrence of dumping and injury:

- a. In the absence of injury to the domestic industry, the Authority is required to examine the likely effect of expiry of duty, as held by CESTAT in P.T. Asahimas Chemicals Vs. Designated Authority.
- b. Despite the duties in force, the situation of the domestic industry remains fragile.
- c. The producers and exporters from China PR have continued dumping in the Indian market even after imposition of anti-dumping duty. The dumping margin is positive and significant.
- d. The Chinese producers are habitual of unfair trade practices and are not just dumping in India but also other markets.
- e. The imports into India increased, even after imposition of anti-dumping duty, due to low quantum of anti-dumping duty imposed on Wankai. The imports are likely to increase multi-fold in event of cessation of anti-dumping duty.
- f. The imports from China have continued to increase even subsequent to the period of investigation, in April-December 2025.
- g. As opposed to the submissions of the interested parties, as per the response filed by Wankai, the export sales to India have increased by 800%, while the export price to India has declined. This shows that in the absence of anti-dumping duty, the imports are likely to increase.
- h. Considering that Wankai engaged in absorption of duties, the claim of absence of likelihood of dumping cannot be accepted.
- i. The market share of subject imports has increased while that of the Indian industry has declined over the injury period.
- j. The Chinese producers have set up capacities in excess of domestic demands. The excess capacities in India are 6 times the demand in India. Such overcapacities have the potential to wipe out the Indian industry.
- k. Since the imposition of duties in 2020, the capacities in the subject country have increased.
- l. Contrary to the submissions of the other interested parties, the Indian Authority as well as investigating authorities globally have held that presence of excess capacities in the subject country indicates likelihood of increased imports from the subject country. Further, the Manual of Operating Practices requires examination of excess capacities for determination of likelihood.
- m. In case of excess capacities, the producers will be willing to sell the product in case, it is able to recover marginal costs as the same will offset the fixed costs.
- n. Wankai has failed to explain why the idle capacities would not be used to increase exports to India.
- o. Despite overcapacities in the subject country, the Chinese producers are expanding further capacities. Cessation of anti-dumping duty is likely to lead to imports of huge volume of subject goods.
- p. Chinese producers have idle capacities which are more than the demand in India.
- q. The producers from the subject country trade remedial measures in a number of jurisdictions due to unfair trade practices.

- r. The experience of jurisdictions such as European Union and USA, where in anti-dumping duty has been imposed has shown that the imposition of measures has been critical to curb the flow of imports.
- s. The imports from China PR have increased substantially in the other jurisdictions, such as Argentina and European Union, wherein the duties have been allowed to lapse. The European Union re-imposed anti-dumping duty after the anti-dumping duty were originally expired due to significant increase in imports from China PR.
- t. India was the largest market for the Chinese producers prior to imposition of anti-dumping duty.
- u. European Union was the largest market for the Chinese producers in the recent period. However, due to initiation of anti-dumping investigation, the exports from China PR to European Union have declined and such exports have been diverted to the Indian market. Expiry of anti-dumping duty will open floodgates for imports from China PR.
- v. There is no alternate market that can absorb excess capacities set up in China PR. The largest consumers of the product include USA, EU and Vietnam. While US and EU have imposed trade remedial measures and tariffs on imports from China PR, Vietnam has surplus domestic capacities.
- w. Contrary to claim of the interested parties, the exports from China to other jurisdictions that imposed measures, such as Argentina, Brazil, Canada, European Union, Japan, Malaysia, SACU and USA have declined.
- x. The Authority has concluded in multiple investigations that imports declined due to imposition of duty. Considering the same, it cannot be considered that exports to third countries cannot decline, pursuant to imposition of duties in such countries.
- y. 91% of exports from China PR to third countries are at dumped and injurious prices.
- z. India is a price attractive market as 61% of exports from China PR to third countries are priced lower than the price of exports to India. Such exports are much more than the demand in India. The Chinese exporters are likely to divert these exports to the Indian market in case of cessation of anti-dumping duty.
- aa. The import price from China PR has declined over the period of investigation. The imports are undercutting the prices of the domestic industry and are priced below the cost of sales of the domestic industry. The domestic industry has remained profitable only due to anti-dumping duty in force.
- bb. The domestic industry has not been able to increase its price commensurate with its costs as the subject imports have entered India at prices below the cost of sales of the domestic industry. The increase in duties pursuant to anti-absorption investigation has allowed slight respite to the domestic industry, however, it remains in a fragile state.
- cc. In case of expiry of anti-dumping duty, the domestic industry will be forced to reduce prices to the level of import price. In such a case, the domestic industry is likely to suffer losses.
- dd. In case, post cessation of anti-dumping duty, the domestic industry maintains its prices, the users are not likely to purchase from them which will lead to loss of complete fixed cost by the domestic industry.

- ee. The viability of new investment in India is at risk, in case of cessation of anti-dumping duty. A number of producers have made investments to set up capacities in India.
- ff. The determination of likelihood of dumping and injury is required to be made for the country as a whole, and not individual producer.

**I.3. Examination by the Authority**

- 92. The present investigation is a sunset review of anti-dumping duty imposed on the imports of the subject goods from the subject country. Under the Rules, the Authority is required to determine whether continued imposition of anti-dumping duty is warranted. This also requires an examination of whether the duty imposed has served the intended purpose.
- 93. The Authority notes that the foreign producer has made submissions with regard to likelihood based on its own data, however, the likelihood for continuation or recurrence of dumping and consequent injury is to be evaluated for the subject country as a whole and not with respect of individual producer / exporter. This is particularly since the producer in question, Wankai, has been treated as non-cooperative in the present review.
- 94. The Authority has undertaken a detailed analysis regarding the likelihood of continuation or recurrence of dumping and injury to the domestic industry as given below. The examination of the parameters of likelihood is as follows:

**a. Continued dumping despite existence of anti-dumping duty**

- 95. The Authority notes that the dumping margin quantified in the present investigation is positive and significant. Hence, the dumping has continued in the Indian market, even after imposition of anti-dumping duty. The Authority also notes that the major exporter in the present case, Wankai, had previously absorbed anti-dumping duty. In view of the same, the Authority finds that dumping is likely to continue in the event of expiry of duty.

**b. Increase in imports despite anti-dumping duty in force**

- 96. The applicant has claimed that the volume of imports from the subject country has increased even after imposition of anti-dumping duty. The Authority notes that the subject imports have increased by 763% over the injury period, while the demand has increased only by 57%. Thus, the subject imports continue to increase and capture the potential increase in demand in the Indian market.

Particulars	Unit	2021-22	2022-23	2023-24	2024-25
Subject imports	MT	23,142	50,213	2,13,784	1,99,704
Demand	MT	12,23,681	14,75,878	17,47,192	19,21,748

97. The Authority further notes that the primary increase in imports is from Wankai. The domestic industry has submitted that the imports have increased primarily because of lower duties imposed on imports from Wankai. The Authority, in a recent anti-absorption investigation, held that Wankai has absorbed the anti-dumping duty imposed on imports from the said producer and has accordingly, increased the quantum of duty on Wankai. The Authority notes that even during the period of investigation, a significant share of imports are being cleared at the individual duty rate applicable on applicable to Wankai. Thus, the Authority notes that in a situation where lower anti-dumping duty applicable to one producer led to increase in imports into India, there is likelihood of increase in imports from the subject country in case of expiry of the anti-dumping duty in force.

**c. Significant capacities held by producers in the subject country**

98. The domestic industry has provided information regarding capacities, production and demand in subject country and other countries based on Wood Mackenzie Report. The other interested parties have not placed any contrary evidence on record, regarding the production and capacities in China.

99. It is noted that while the demand in China PR is to the tune of 8,166 KT, the capacity in China PR is 19,069 KT. Thus, the Chinese producers hold an excess capacity of 10,903 KT per annum. Out of the global excess capacity of 12,568 KT, China accounts for 87%. As compared to the excess capacities in China, the demand in India is only 1,922 KT. Thus, the excess capacity in China PR is almost 6 times the demand in India

Particulars	Unit	Global	China PR
Capacity	KT	41,243	19,069
Demand	KT	28,675	8,166
Capacity in excess of demand	KT	12,568	10,903

*Source: Wood Mackenzie Report*

100. The Authority further notes that while there are excess capacities in the subject country, the producers in the subject country are operating at underutilized capacities. Such idle capacities are much more than the complete demand in India. Such idle capacities are likely to be used for exports to India, in the absence of duty.

Particulars	Unit	China PR
Capacity	KT	19,069
Production	KT	13,748
Capacity utilization	%	72%
Idle capacity	KT	5,321
Demand in India	KT	1,922
Idle capacities in relation to demand	%	277%

*Source: Wood Mackenzie Report*

101. The interested parties questioned that merely because Chinese producers have idle capacity, it does not mean that the capacities would be utilized for exports to India. The Authority does not find merit in such argument. Data submitted by all interested parties in the present case show that the plants for the subject goods are capable of operating at almost full capacity utilization. Any business would always strive to maximize its capacity utilization. In case there is a market available to dispose of a surplus volume, every prudent business would endeavour to market the product, since the additional sales would allow it to absorb the burden of the fixed cost. There is no reasonable basis to assume that a business having idle disposable capacity would continue to hold it idle, instead of marketing the product to all available markets.

**d. Capacity expansion in China PR**

102. The domestic industry has provided evidence that the producers in China PR are undertaking further capacity expansion. The Authority notes that the Chinese producers already have excess capacities which are much more than the domestic demand in China PR. Even then, the producers are planning capacity expansion. Such increase in capacities is meant for the export markets. These are likely to be used for exports to India, in the event the present anti-dumping duty are allowed to expire.

Particulars	Unit	2024	2025	2026	2027	2028
Capacity	KT	19,069	21,839	22,960	23,411	24,161

*Source: Wood Mackenzie Report*

**e. Third country dumping**

103. The domestic industry has claimed that significant exports to third countries from China PR is at dumped and injurious prices.

Particulars	Unit	Volume
Exports at injurious prices	MT	51,60,926
Total exports from China PR	MT	69,89,698
Share of injurious exports	%	74%
Exports at dumped prices	MT	68,75,962
Share of dumped exports	%	98%
Injury margin	%	0-10%
Dumping margin	%	15-25%

*Source: Trade map data*

104. The Authority notes that as per the information on record, the Chinese exporters have exported 74% of the subject goods at prices below the non-injurious price of the domestic industry, and at dumped price. Thus, the producers in China are not only dumping in India, but are also dumping in third countries.

**f. Measures imposed by other countries and import behaviour in such countries**

105. The third country dumping is further corroborated by the fact that the Chinese producers face trade remedial measures in a number of jurisdictions including Argentina, Brazil, Canada, the European Union, Japan, Malaysia, South Korea, South African Customs Union, Türkiye and the United States of America. This shows that the producers in the subject country have engaged in dumping in multiple jurisdictions.

Country Imposing Measure	Type of Measure Imposed	Date and other remarks	Remarks
Argentina	Anti-dumping Duty	24-10-2013	Duty imposed
United States	Anti-dumping Duty	06-05-2016	Original anti-dumping duty
		13-04-2022	Continuation of anti-dumping duty
United States	Countervailing Duty	06-05-2016	Original CVD duty
		11-04-2022	Continuation of CVD duty
Brazil	Anti-dumping duty	29-11-2016	Original anti-dumping duty
		25-11-2022	Continuation of anti-dumping duty
Japan	Anti-dumping Duty	28-12-2017	Original anti-dumping duty
		31-01-2023	Continuation of anti-dumping duty
South Korea	Anti-dumping Duty	30-07-2024 30-11-2024	Provisional duty Definitive duty
South African Customs Union (SACU)	Anti-dumping duty	19-05-2020	Imposition of duties
Canada	Anti-dumping duty	17-06-2025	Original anti-dumping duty
	Countervailing duty	17-06-2025	Original CVD duty
Turkey	Safeguard measures	13-12-2020	Original measures
		13-12-2023	Continuation of measures till December 2026
Malaysia	Anti-dumping Duty	07-05-2025	Duties imposed
EU	Anti-dumping Duty	13-08-2004	Duties imposed till November 2015
EU	Anti-dumping Duty	28-11-2023	Provisional duty imposed

**g. Loss of largest markets for the Chinese producers, and absence of alternative markets**

106. The information placed on record shows that India was the biggest market for the Chinese producers prior to imposition of anti-dumping duty in March 2021. However, due to imposition of anti-dumping duty in India, the exports were diverted to European Union which became the largest market. The European Union has also imposed anti-dumping duty on imports of the subject goods from the subject country in 2022-2023. Post such imposition of duties in the European Union, the imports into European Union declined. Therefore, the foreign producers are faced with the loss of their largest markets. The domestic industry has highlighted that pursuant to imposition of measures in European Union, there has been an increase in imports into India again.
107. It is further noted that European Union, India, United States of America and Vietnam are the largest consumers of the product under consideration. The European Union and the USA have already imposed anti-dumping duty on imports of subject goods from China PR. Pursuant to such duties, and potentially the tariffs imposed in USA, the exports to these countries have significantly declined. The domestic industry claimed that while Vietnam is another large consumer of the product, Vietnam already has capacity more than the demand in the country. The Authority notes that the total demand in Vietnam is only 580 KT, compared to the demand of 1,922 KT in India. Since anti-dumping duty is imposed in USA and European Union, India shall become a more lucrative market, in the absence of duty.
108. Wankai has submitted that it has not engaged in dumping of the product under consideration in India and there is no likelihood of increase in imports from the said exporter. The Authority notes that the likelihood analysis has to be conducted for country as a whole and not separately for each producer / exporter. In any case, even as per the limited extent of volume reported as exports to India by Wankai, the export sales by Wankai have increased to India while the exports to third countries have declined.

Particulars	Unit	2021-22	2022-23	2023-24	POI
Exports to India	MT	***	***	***	***
Trend	Indexed	100	1,602	1,217	900
Exports to third countries	MT	***	***	***	***
Trend	Indexed	100	80	93	88

**h. Trend of exports to third countries, subsequent to imposition or expiry of duty.**

109. The domestic industry has highlighted that as a result of the imposition of duties, the Chinese producers have lost market in several jurisdictions such as Brazil, Canada, European Union, Japan, Malaysia, SACU and USA have declined.
110. Further, the trends highlighted by the domestic industry reveal that post expiry of anti-dumping duty on imports of the subject goods from China PR into Argentina in 2023, the imports into Argentina increased from 1,419 MT to 70,000 MT. Similarly, the anti-dumping duty imposed by European Union on imports from China PR lapsed in 2015.

The imports increased from a level of 75,000 MT to 2,00,000 MT and gradually to 5,00,000 MT. The European Union was forced to initiate anti-dumping investigation and impose anti-dumping duty on such imports once again in November 2023. Pursuant to such initiation of investigation, the imports have declined again. The European Commission has noted as follows in its preliminary findings, with regard to the impact of initiation of investigation on the imports into the European Union.

*“(68) The Commission thus found that the trend of increasing volumes had stopped following the second quarter of 2023. However, when assessing the significance and the reliability of these figures for confirming or invalidating the threat of injury analysis, the Commission also observed that the decrease in the average monthly Chinese import volumes from July to September 2023 (compared to 2022) could be attributed to the chilling effect of (i) the initiation of the current proceeding on 30 March 2023 with a distinct possibility of adoption of provisional measures within the period of at most 8 months and (ii) the request for registration by the complainant filed on 31 May 2023. In other words, the post-investigation period data up until June 2023, right after the request for registration of imports was filed by the complainant, confirms the significant rate of increase of dumped imports observed during the period considered. The significant decrease in volume of imports from June 2023 does not negate this conclusion as it is a likely effect of the request for registration of imports with the view of retroactive application of the duties. Such request, especially considering that at that point there was no indication as to the level of potential duties that may be imposed, had an inevitable chilling effect on the volume of imports. It follows that the significant rate of increase of imports from 2021 onwards, as confirmed by the post-investigation period data, indicates the likelihood of substantially increased imports within the meaning of Article 3(9)(a) of the basic Regulation.”*

111. Lastly, the domestic industry has relied on the trend of exports into USA shows that the volume of exports declined from 1,50,058 MT prior to initiation of investigation, to 480 MT post imposition of duty. The aforesaid trends reveal that the Chinese producers tend to reduce exports when duties are in force, but the exports substantially increase when the duties have lapsed.

**i. Price attractiveness of India as a market**

112. The domestic industry has submitted that the Indian market is an attractive market for exporters from the subject country as the prices in the Indian market are more lucrative than price of exports from China PR to rest of the world. It is noted that 61% of the exports from China PR are at prices lower than the price of exports to India. Such volume is much more than the demand in India. In case of expiry of anti-dumping duty, the Chinese producers will be able to fetch better prices from the Indian market and are likely to divert exports to India.

Particulars	Unit	Volume
Volumes exported at lower prices	MT	42,45,613
Total exports from China PR	MT	69,89,698
Share of lower priced exports in total exports	%	61%

Source: Trade map data

113. The Authority further notes that such lower priced exports to third countries are being made at an average FOB price of USD 846 per MT, which translates into a landed price of approximately ₹ 81,540 per MT. Considering that the foreign producers are willing to supply the subject goods at such prices to other countries, there is no reason that they are likely to be unwilling to supply the subject goods to India to dispose of their excess capacity, in the absence of duty. If imports enter the market at such lower prices, it would wreak havoc on the conditions of competition in the country.

**j. Likely price suppression or depression**

114. The Authority notes that the subject imports are undercutting the prices of the domestic industry and entering the Indian market below the cost of sales of the domestic industry even when the anti-dumping duty is in force. In the absence of anti-dumping duty, the imports are likely to enter the Indian market at prices even lower than the current prices. In the absence of anti-dumping duty, the subject imports are likely to suppress and depress the prices of the domestic industry even further.
115. In this regard, the Authority also notes that the domestic industry faced price suppression and depression during 2023-24, when the duty imposed was being absorbed by Wankai. This further demonstrates that, in the absence of duty, the imports are likely to depress the prices of the domestic industry, and prevent price increases, which otherwise would have occurred.

**k. Fragile situation of the domestic industry**

116. It is noted that the domestic industry faced a steep deterioration in profitability, into a situation of losses during 2023-24. The same was a result of cheaper imports entering the Indian market, at lower prices. The domestic industry lost market share to the subject imports during this period. The domestic industry was forced to sell the subject goods at losses, and its cash profits and return on capital employed had also declined significantly. The Authority further notes that the domestic industry has been able to recover in the period of investigation as compared to performance in the previous year due to the absorption being addressed pursuant to anti-absorption investigation. It is also noted that the prices of the domestic industry have declined, disproportionate to the while the cost of raw material has increased. However, the domestic industry remains in a fragile state. Further, the decline in performance experienced during 2023-24 shows that the domestic industry is likely to suffer injury due to dumping of the subject goods in the absence of anti-dumping duty.

**I. The domestic industry is likely to suffer injury in the absence of anti-dumping duty**

117. The Authority notes that since the landed price of the subject imports is below the cost of sales of the domestic industry. In the absence of duty, assuming the domestic industry is forced to compete with the import prices, the domestic industry is likely to suffer losses.

Particulars	Units	POI
Cost of sales	₹/MT	***
Selling price	₹/MT	***
Landed price	₹/MT	***
Profits at landed price	₹/MT	(***)
Profits at landed price	₹ Lakhs	(***)

**I.4. Conclusion on likelihood of continuation or recurrence of dumping and injury to the domestic industry**

118. Based on the foregoing, it is summarized as below.
- Dumping has continued in India despite anti-dumping duty in force, demonstrating likelihood of continuation of dumping.
  - The subject imports have increased despite the duties in force, and at a rate more than the increase in demand.
  - The increase in imports is on account of a significant imports of Wankai produced goods. The increase in imports due to low duty rate shows likelihood of increase in imports from the subject country in the absence of anti-dumping duty.
  - The producers in the subject country hold capacities more than the domestic demand in China PR, and have under utilized capacities. Such capacities are likely to be used for exports to India in the event of cessation of anti-dumping duty. Such idle capacities are more than the demand in India.
  - While there are excess capacities in China PR, the producers in the subject country are undertaking further capacity expansion.
  - The exporters from the subject country are dumping the product under consideration even in third countries.
  - As a result, several jurisdictions have imposed trade remedial measures on the exports from China.
  - While European Union became the largest market for China post imposition of duty on India, the exports to European Union have declined once it initiated anti-dumping investigation.
  - In terms of major consuming markets, the Chinese producers face trade remedial measures in USA and European Union. While Vietnam does not have measures against imports from China, it has surplus capacities itself.
  - The producers / exporters in the subject country have lost market in other export markets as well due to the imposition of duties.
  - The trend of exports from China to European Union and Argentina shows that, once duty expires, the exports from China increase again.

- l. 61% exports from China PR are at prices below the Indian prices. In case of expiry of anti-dumping duty, such exports are likely to be diverted to the Indian market.
- m. The subject imports have entered the Indian market at prices below the cost of sales of the domestic industry, even though anti-dumping duty is in force.
- n. The imports are undercutting the prices of the domestic industry, and are likely to suppress or depress its prices in the event of expiry of duty.
- o. The domestic industry suffered deterioration in performance in 2022-23, due to absorption of duty by Wankai. Though its performance improved during the period of investigation, its situation remains fragile.
- p. In the absence of anti-dumping duty, the domestic industry is likely to be forced to match import price and incur losses.

119. In view of the above, the Authority concludes that there is likelihood of continuation of dumping and consequent injury, in the event of expiry of duty.

**J. MAGNITUDE OF INJURY MARGIN**

120. The Authority has determined the non-injurious price for the domestic industry on the basis of the principles laid down in the Rules read with Annexure III, as amended. The non-injurious price of the subject goods has been determined by adopting the verified information/data relating to the cost of production for the period of investigation. The non-injurious price has been considered for comparing the landed price from the subject country for calculating the injury margin. For determining the non-injurious price, the best utilisation of the raw materials, the utilities and the production capacity by the domestic industry over the injury period have been considered. It is ensured that no extraordinary or non-recurring expenses were charged to the cost of production. A reasonable return (pre-tax @ 22%) on the average capital employed (i.e., average net fixed assets plus average working capital) for the product under consideration was allowed as pre-tax profit to arrive at the non-injurious price as prescribed in Annexure III of the Rules and is being followed.

121. Based on the landed price and non-injurious price determined as above, the injury margin for producers/exporters has been determined by the Authority and the same is provided in the table below: -

**Injury Margin Table**

SN	Name of Producer	NIP	Landed Price	Injury Margin	Injury Margin	Injury Margin
		USD/MT	USD/MT	USD/MT	%	Range (%)
1	Any	***	989	***	***	0-10%

**K. NON-ATTRIBUTION ANALYSIS AND CASUAL LINK**

122. As per the Rules, the Authority, inter alia, is required to examine any known factors other than the dumped imports which at the same time are injuring the domestic industry, so that the injury caused by these other factors may not be attributed to the dumped imports. Factors that may be relevant in this respect include, inter alia, the volume and prices of imports not sold at dumped prices, contraction in demand or changes in the patterns of consumption, trade restrictive practices of and competition between the foreign and domestic producers, developments in technology and the export performance and the productivity of the domestic industry. Though the Authority has not found injury to the domestic industry in the present period of investigation, it has been examined below whether factors other than dumped imports are likely to contribute to the injury to the domestic industry:

**a. Volume and value of imports from third countries**

123. It is noted that apart from the subject country, significant imports of the subject goods are from Bangladesh, Thailand and Vietnam. However, the price of imports from Bangladesh and Vietnam is above the price of imports from the subject country. While the price of imports from Thailand was lower than price of imports from China PR in the period of investigation, the profitability of the domestic industry has improved in this period. Therefore, the likely injury to the domestic industry cannot be attributed to imports from third countries.

**b. Contraction in demand**

124. The demand for the subject goods has steadily increased over the injury period and was the highest during the period of investigation. The domestic industry is not likely to suffer injury due to possible contraction in demand.

**c. Pattern of consumption**

125. There has been no material change in pattern of consumption of the product under consideration, which is likely to cause injury to the domestic industry.

**d. Conditions of competition and trade restrictive practices**

126. There are no trade restrictive practices or conditions of competition, which are likely to cause of injury to the domestic industry.

**e. Developments in technology**

127. There has been no change in technology for production of the subject goods, due to which the domestic industry is likely to suffer injury.

**f. Productivity**

128. The total production of the domestic industry including production has increased over the injury period. Thus, the likelihood of injury cannot be due to decline in productivity.

**g. Export performance of the domestic industry**

129. The injury information examined hereinabove relates only to the performance of the domestic industry in terms of its domestic market. Thus, export performance of the domestic industry cannot be a cause for the likely injury determined.

**h. Performance of other products**

130. The likely injury cannot be attributed to the performance of other products of the company, as the domestic industry has segregated and provided information with regard to the like article only.

**L. INDIAN INDUSTRY'S INTEREST & OTHER ISSUES**

**L.1. Submissions by other interested parties**

131. The other interested parties have not made any submissions with regard to the Indian industry's interest, barring that the cost of end user would increase, in case the duties are continued in this investigation.

**L.2. Submissions by the domestic industry**

132. The domestic industry has made the following submissions with regard to the Indian industry's interest:

- i. Public interest must be determined with regard to interests of (a) the domestic producer of like article, (b) the domestic consumers of the product, (c) the upstream and downstream industries in both the producing and consuming industry, and (d) the general public.
- ii. The fact that the users and consumers of the product have not participated in the present investigation shows that there is no adverse impact of continuation of anti-dumping duty.
- iii. There is no evidence of adverse impact of anti-dumping duty on the downstream industry as the demand for the product under consideration has increased and the price of downstream product has not increased due to imposition of anti-dumping duty.
- iv. The capacity of the Indian industry is enough to cater to the entirety of demand in India.
- v. While the capacity in India is enough to cater to the entire demand, the reliance on cheap imports has led to foreign exchange outflow from India.
- vi. The Indian industry has the capacity to export significant quantities. Continuation of anti-dumping duty will help Indian industry to remain competitive in the Indian as well as foreign markets.
- vii. The Indian industry has made significant investments for new producers to set up manufacturing facilities post imposition of anti-dumping duty. Continuation of duties is essential to maintain viability of such investments.
- viii. Continuation of anti-dumping duty will not impact the availability of the product in India as subject goods can be imported from various other sources.

- ix. The impact of continuation of anti-dumping duty is negligible on the downstream users.
- x. The cost of the subject goods is not a major price driver of the ultimate downstream product.
- xi. In case of expiry of anti-dumping duty, the viability of the upstream industry, that is industry manufacturing PTA and MEG will be substantially impacted.
- xii. India is a more lucrative market and the producers from China PR are likely to divert exports to India in case of expiry of the anti-dumping duty.
- xiii. Producers in China PR receive a number of benefits from the Governments of the subject country. Such producers have unfair advantage over the Indian industry.

### **L.3. Examination by the Authority**

133. The Authority notes that the primary objective of anti-dumping duties is to rectify the injury inflicted upon the domestic industry by the unjust trade practices of dumping, thereby fostering an environment of open and equitable competition in the Indian market. This is not merely a regulatory measure, but a matter of national interest. The imposition or continuation of anti-dumping measures is not designed to curtail imports from the subject country arbitrarily. Rather, it is a mechanism to ensure a level playing field. The Authority acknowledges that the persistence of anti-dumping duties may influence the price levels of the product in India. However, it is crucial to note that the essence of fair competition in the Indian market will remain unscathed by the imposition of these measures. Far from diminishing competition, the continuation of anti-dumping measures serves to prevent the accrual of unfair advantages through dumping practices. It safeguards the consumers' access to a broad selection of the subject goods. Thus, anti-dumping duties are not a hindrance but a facilitator of fair-trade practices.
134. The Authority issued the initiation notification, inviting views from all interested parties including importers, users and consumers. An Economic Interest Questionnaire was also prescribed to allow various stakeholders, including the domestic industry, producers/exporters and importers/users/consumers to provide relevant information concerning the present investigation, including the possible effect of anti-dumping duty on their operations.
135. The Authority notes that none of the users or importers of the product under consideration have participated in the present investigation and opposed continuation of anti-dumping duty. The non-participation of users demonstrates that the users are not adversely affected by the imposition of the duties.
136. Further, the present investigation is a sunset review of anti-dumping duty imposed on imports of subject goods from the subject country. There is no information on record which shows adverse impact of imposition of anti-dumping duty on the downstream industry.

137. On the contrary, the information brought on record shows that post imposition of anti-dumping duty, new producers including Indorama Yarns Private Limited, Sumilon Industries, Jindal Polyfilms Limited, Uflex Limited and Sparsh Industries have set up capacities in India. The Indian industry has invested more than ₹ 1,500 crores for production of the subject goods. Thus, the imposition of duty has been imperative in encouraging investment in India.
138. The applicants have submitted that there have been material investments for PTA and MEG, which are major raw material for the product under consideration, by Indian Oil Corporation Limited, MCPI Private Limited and Reliance Industries Limited. Such capacities are viable in India due to healthy demand of the downstream industry, including PET Resins.
139. The Authority notes that the Indian industry has capacity to cater to entirety of demand in India. Even if assuming that the imports from China cease, the continuation of anti-dumping duty will not lead to shortage of the product in the Indian market.

Particulars	POI
Demand in India	19,19,456
Total Capacities in India	24,05,500
Gap	(4,86,044)

140. Further, the applicants have placed information on record to show that the subject goods can be imported from various countries including Brazil, Taiwan, Vietnam, Oman, Türkiye and South Korea which have capacities more than their domestic demand.

Country	Capacity (KT)	Demand (KT)
Brazil	1,010	619
Taiwan	1,457	264
Vietnam	1,230	580
Oman	850	252
Türkiye	1110	476
South Korea	742	504

141. In addition to the aforesaid countries, the Authority notes that the subject goods have also been imported into India in significant quantities from Bangladesh, Taiwan, and Thailand during the injury period. Therefore, even though the imports from subject country may continue even after the continuation of duties, the subject goods can also be imported from such sources.

142. The applicants have also highlighted that the capacity of the domestic industry is enough to cater to the entirety of Indian demand as well as export to foreign countries. Since the subject imports are priced below the cost of sales of the domestic industry, continuation of anti-dumping duty will help remain the domestic industry viable in the Indian market and contribute to export potential of the Indian industry.
143. It is further noted that while the interested parties have claimed that the cost of end users would increase, no information in this regard has been provided. As per information and evidence placed on record, the impact of continuation of anti-dumping duty is minimal. The information on record shows that the impact of continuation of anti-dumping duty will only be ₹0.08 per 1 litre bottle. It is further noted that the price of subject goods is not the cost driver of the price of the downstream product as it entails a negligible share of the price of the final product. The major cost element is the liquid which is being packed in the downstream product.

Particulars	Unit	Rate
Price of 1 litre water bottle	₹	20-100
Weight of bottle	Gm	22.5
Consumption Norm	Gm/Gm	1.02
Consumption of PET in bottle	Gm	22.95
Anti-dumping duty	₹/gm	0.0035
Impact on price of bottle, if any	₹	0.08

**M. POST-DISCLOSURE COMMENTS**

144. The Authority circulated the disclosure statement containing all essential facts under consideration to all interested parties on 24<sup>th</sup> February 2026 before arriving at the final determination. The interested parties were given the opportunity to offer comments latest by 3<sup>rd</sup> March 2026. Wankai sought additional time for filing comments. The Authority granted time until 9<sup>th</sup> March, 2026 to Wankai to offer comments, considering the time limits for completion of investigations.
145. Subsequent to the issuance of disclosure statement, Wankai sought disclosure of additional information, vide email dated 27<sup>th</sup> February 2026. Wankai sought disclosure of (a) names of traders alleged to be exporting, (b) details of imports, (c) import transactions through traders, (d) volume and value exported through traders, (e) certificates of origin, (f) invoice and invoice numbers referred in the disclosure statement, (g) copy of DG Systems data, (h) photographic and videographic evidence submitted by domestic industry, (i) replica non-confidential version of application.
146. Since some of the submissions pertained to the domestic industry, the Authority directed the domestic industry to respond to the submissions by Wankai. The domestic industry submitted the photographic evidence, and volume and value of exports through traders

as per their information. The domestic industry emphasized that the replica of non-confidential version had already been revised and circulated, and no comments were made by Wankai thereafter. As regards certificate of origin, invoices and invoice numbers, the domestic industry submitted that the same have been procured on utmost assurances of confidentiality. The domestic industry submitted that if such information is provided, it would lead to disclosure of names of parties which provided the information to the domestic industry and expose such party before Wankai, other suppliers, importers and consumers. This could have very serious impact on such party. This will jeopardise the strategic procurement options of such importing parties. Further, inter alia, it may lead to refusal of supply by Wankai and its traders in future, if Wankai is aware that such importers provided the Certificate of Origin. The same applies to videographic evidence as well, as this would allow a party to know the source of information. Further, the domestic industry highlighted that the Authority has not relied upon the same.

147. Vide communication dated 5<sup>th</sup> March 2026, the Authority informed Wankai that the names of traders who have exported the subject goods manufactured by Wankai constitutes confidential and business sensitive information of third parties. The exporter was also informed that the Authority obtains information from DG Systems in order to cross-verify the information and evidence submitted by various interested parties. The Authority is not permitted to share this information with any interested party, as it contains significant business-sensitive information relating to exporters and importers, the confidentiality of which is protected under various laws in the country. However, the Authority provided a non-confidential summary of the import data in the form of direct exports by Wankai, exports by traders mentioning the grade name of Wankai or identifying Wankai as the producer, and exports by other producers. The Authority also informed Wankai that certificates of origin, invoices and invoice numbers shall be treated as confidential business information of third parties, which is protected under Rule 7 of the Anti-Dumping Rules. The response of the domestic industry was also provided to Wankai. The Authority thereafter provided time till 9<sup>th</sup> March 2026 to Wankai to furnish its comments.
148. The Authority has examined all the post-disclosure comments made by the interested parties in these final findings to the extent deemed relevant. Any submission which was merely a reproduction of the previous submissions and which had been adequately examined by the Authority has not been repeated for the sake of brevity.

#### **M.1. Views of other interested parties**

149. In their post-disclose comments, the interested parties have reiterated their comments regarding absence of declaration with regard to need to check imports for entire injury period by the applicants; relationship of IVL and Indorama to Guangdong IVL Polymer; request for reliance on records of Chinese producers for normal value; delay in response for Wankai International due to mistake of the personnel on account of the trader being

located in different country; and the imposition of duty is not in public interest. Further, the following arguments have been made by interested parties.

- a. The information with regard to exports by Wankai to India and third countries have been disclosed in the disclosure statement, and should be treated as confidential.
- b. There is no accurate information with regard to production of Jindal Polyfilms Limited, Sumilon Industries Limited and Uflex Limited.
- c. There is no finding given on the contention of the exporter that the applicants were required to give declaration with regard to imports for the entire injury period, and for all countries.
- d. While Indorama and RIL have provided a declaration for no imports only for subject country, IVL has not provided a signed declaration.
- e. Reliance Industries also has several related companies in other countries engaged in subject goods such as Reliance Polyester Ltd. in Thailand and Recron (Malaysia) Sdn. Bhd & RP Chemicals (Malaysia) Sdn. Bhd in Malaysia.
- f. There is serious confusion with regard to domestic producers and production, and a different yardstick cannot be adopted for different parties to the investigation.
- g. The production of Jindal Polyfilms has not been considered in total domestic production, without any reason.
- h. The total domestic production considered has not been disclosed. The confidentiality claimed in this regard is unjustified.
- i. Apart from ocean freight, the domestic industry has not disclosed evidence of any adjustments to export price.
- j. The certificates of correctness and declaration from consultants were provided by the domestic industry after a delay of 4 months from initiation. However, no adverse view has been taken, even though an adverse view has been taken of the fact that Wankai did not file a response for Wankai International, for a negligible volume.
- k. The disclosure statement does not indicate the manner in which the confidential version of the application and the non-confidential version are a replica. The non-confidential version has certain un-numbered pages. If such pages were un-numbered in the confidential version as well, it raises a question as to how the information provided was adequate and accurate.
- l. The domestic industry has not disclosed the source of market intelligence data relied upon in application.
- m. Declarations for imports/relation, details of plant shut down, evidence for adjustments to export price, number of employees, certificates by domestic industry and declaration by legal representative for correctness of information in the application etc., is not business sensitive, and should be disclosed. Wankai has only requested for disclosure of reasons for shutdown.
- n. Aggregate number of employees were required to be disclosed as per Trade Notice.
- o. The response filed for Wankai International was as a matter of clarification, and not a standalone or new response.
- p. Information relied upon to draw adverse inference against Wankai, such as details of imports, certificates of origin, etc. should be disclosed to Wankai, particularly

since the information concerns Wankai. In the absence of adequate disclosure of information, Wankai is unable to defend itself.

- q. No sufficient justification has been provided by the domestic industry for failing to disclose the information. Under Rule 6(7), the Authority was required to make the available the evidence presented by one interested party to other interested parties. In case a non-confidential summary has not been provided, the Authority was required to disregard the information provided.
- r. The burden of proof for supplying correct information for the clearance of goods rests on the Indian importers. Wankai cannot be punished by denying individual treatment to it.
- s. Rule 7 does not allow confidentiality in respect of information for third parties, which are not even before the Authority.
- t. In case the information with regard to names of exporters was not publicly available, it raises the question as to how the domestic industry was able to ascertain such information. The domestic industry has not offered any explanation as to how it was able to collect such business sensitive information of third parties.
- u. The Authority has not examined how the domestic industry has access to transaction-wise import data, which is not permissible under the law.
- v. The disclosure of DG Systems data is permitted under Section 135AA of the Customs Act, 1962.
- w. The source from which the photographic and videographic evidence, and certificates of origin were procured have not been examined, and it appears that the same were arranged by the domestic industry using questionable means.
- x. The issue of response by Chongqing Wankai has been raised belatedly. In any case, no response is required, since Chongqing Wankai has not exported the product to India. In the case of Ceramic Tiles, the exporters concerned had actually exported to India.
- y. The exporter has cooperated in the original investigation itself, and all PCN-related issues were examined by the Authority in the original investigation.
- z. Wankai requested the Authority for on-site verification of first-hand data. However, the Authority has relied on third party data, on which Wankai has no control.
- aa. The Chinese Regulations (Measures) use the word “may”, meaning that Chinese authorities may carry out verifications. It is not conclusively established that all Certificates of Origin are issued by CCPIT only. Sample Certificates of Origin cannot substitute detailed DRI investigation, and without the DRI investigation, it cannot be conclusively proven that the exports were manufactured by Wankai.
- bb. In past findings as well, the Authority has not rejected the responses, due to non-cooperation by exporter accounting for a negligible volume.
- cc. Calculation of dumping margin is an exercise of reasonable approximation and not based on arithmetical precision.
- dd. Had exports through traders been in the knowledge of Wankai, it would not have been difficult for Wankai to provide details or information to the extent of at least 70% of the volume.

- ee. The Manual itself provides that response for 100% of the value chain is not required for the producer to be treated as cooperative.
- ff. Wankai has already provided all information as is reasonably available to it and should be allowed an individual duty.
- gg. The landed price determined by Authority in the disclosure statement is comparable to the landed price of Wankai. Therefore, an individual duty should be allowed to Wankai as there is no separate advantage to Wankai in not providing details of alleged traders.
- hh. The quantum of duty should be varied in the present review, as noted in the Manual of Operating Practices.
- ii. Wankai did not absorb the anti-dumping duty, and the anti-absorption duty was incorrectly determined.
- jj. Comparison of increase in imports and demand in percentage terms is not appropriate. Further, the purpose of duty is not to block imports.
- kk. The price of a bottle should be taken as ₹ 20, and not ₹ 20-100.

## **M.2. Views of the domestic industry**

150. The domestic industry has re-emphasized that Wankai should be treated as non-cooperative, and requested for certain producers to be treated as cooperative. In particular, the domestic industry has submitted as under in its post-disclosure comments.
- a. The exporter Wankai is attempting to justify their suppression of information by requesting information and evidence from the Authority.
  - b. Considering that Wankai has exported more than 3,628 transactions from China to India, with a volume of 4,34,948 MT during the injury period, and was involved in getting Certificate of Origin issued, the exporter cannot claim to be unaware about these transactions.
  - c. The clear and deliberate suppression of facts is evident from the fact that the response for Wankai International was also filed belatedly, after the issue was highlighted by the domestic industry, and without seeking permission of Authority.
  - d. No response has been furnished for Chongqing Wankai New Materials Technology Co., Ltd., even though the Authority has denied an individual dumping margin to an exporter in Ceramic Tiles case due to non-participation of group companies.
  - e. Wankai has been suppressing facts from the Authority from the first investigation. In the original investigation, Wankai had supplied speciality grades, but did not inform the Authority regarding the need for PCN. After receiving individual duty, Wankai began exporting commodity products.
  - f. The information sought by Wankai does not relate to Wankai alone, but also relates to the trader and importer, whose business interests are likely to be affected by the non-imposition of duty. The importers and exporters can even face refusal of material from Wankai, which shall imply loss of business to the exporter and loss of source to the importers, as a result of disclosure of information.
  - g. The names of exporters are not in public domain, and thus, cannot be disclosed. The import data is third party information, which the applicant is not authorized to

disclose. However, Wankai is fully aware of the contentions raised by the domestic industry on the basis of such confidential information and therefore, has been given sufficient access to the substance of information provided on confidential basis.

- h. Disclosure of Certificates of Origin would lead to disclosure of names of parties which have provided information to the domestic industry and expose such parties to blacklisting and loss of suppliers.
- i. No prejudice has been caused to Wankai due to non-disclosure of Certificates of Origin, as – (a) the nature of document enclosed, i.e., Certificate of Origin was disclosed to Wankai, (b) the nature of information that the document shows, i.e., it identifies Wankai as manufacturer, was disclosed to Wankai, (c) the administrative procedures governing the issuance of Certificate of Origin were disclosed, and (d) the role of Certificate of Origin in demonstrating the manufacturer at Customs in India was disclosed. This allows Wankai to defend its interests in the matter.
- j. The Certificate of Origin is issued by CCPIT demonstrate that the goods in question were produced in China. The authorities verify the entity which produced the goods in China.
- k. The legal provisions applicable in China allow the issuing authority to verify the records of manufacturer, including their capacity, production process, origin of raw material, finished products, etc. for place of origin. Thus, Wankai was involved in getting the certificates issued.
- l. The invoices and details therein are based on the certificates of origin provided by the domestic industry, which are third party information, which the domestic industry is not authorised to disclose.
- m. The videographic evidence submitted by the domestic industry includes such information which can lead to disclosure of the name of the party from whom this evidence has been procured. The party providing the information provided the information with clear understanding that their name shall not be placed publicly.
- n. The request for disclosure of photographic and videographic is not tenable, since the Authority has not relied upon the evidence in arriving on its determination.
- o. The domestic industry has already replied to the issue concerning replica non-confidential version, and no further issues were raised by the exporter in response.
- p. In accordance with the past practice of Authority, non-cooperative duties should be recommended for all producers and exporters, and the individual duties imposed pursuant to the original investigation should not be continued.
- q. Since no party, including the domestic industry, has sought modification of anti-dumping duty, the same duty should be extended. This is also consistent with the approach adopted in previous investigations.
- r. Since the duty is not required to be modified, the domestic industry is not filing any submissions on non-injurious price.
- s. Considering the mis-utilization of duties, the Authority is requested to consider reverting to combination duties, prescribing both the producer and exporter, as a matter of policy.

### **M.3. Examination by the Authority**

151. The Authority has examined the post-disclosure submissions made by the domestic industry and the other interested parties and notes that some of the comments are reiterations of submissions which have already been examined suitably and addressed adequately in the relevant paras of the final findings. The issues raised for the first time in the post-disclosure comments/submissions by the interested parties and the domestic industry and considered relevant by the Authority are examined below.
152. With regard to arguments regarding imports by applicants from all countries and across the injury period, the Authority notes that the applicants have not imported the product under consideration from any country during the injury period. The information in this regard was provided by the applicants in Proforma IV A, including in the non-confidential version. The interested parties have not provided any basis for alleging that the applicants should have provided a signed declaration and the applicants have imported the product from other countries. The application requires information with regard to imports, which have been provided in the present case. The Authority notes that the provisions of Rule 2(b) of Anti-Dumping Rules bring the eligibility of applicants into question only in case of imports of the subject goods from the subject country during the period of investigation. Therefore, imports from other countries and other periods are not relevant to the issue of determination of scope of domestic industry in the present case. In any case, the Authority has examined the DG Systems data and found that the applicants have correctly disclosed that they do not have any imports from any country throughout the injury period.
153. The interested party has alleged that there is confusion with regard to number of domestic producers. However, the Authority does not find any such confusion in the facts of the present case. At the stage of application, the domestic industry identified the domestic producers of the subject goods, and provided details of domestic production. The applicants made a typographical error in mentioning the name of the producer and inadvertently wrote “Madelin Enterprises Private Limited” as “Minocha Enterprises Private Limited” in one annexure. However, the Authority has noted the list of other domestic producers in the initiation notification itself and correctly identified Madelin Enterprises Private Limited (“MEPL”) as the domestic producer. On the issue having been raised by the interested parties, the domestic industry also clarified the same. Accordingly, there is no such confusion with regard to scope or number of domestic producers.
154. With regard to details of domestic production, the applicants have provided the information reasonably available to them. The information subsequently provided by MEPL closely corresponds with the information provided by the applicants. The interested parties have not provided any evidence to demonstrate that the information provided by the applicants is incorrect, or there was alternatively available information which the applicants could have provided. The Authority, therefore, finds that the applicants discharged their obligations under the Agreement and the Rules. Further, since

MEPL has furnished information with regard to its production and sales, the Authority has relied on the same. However, in the absence of any alternative information placed on record by any party regarding the other domestic producers, the Authority has proceeded based on facts available.

155. Regarding the alleged relationship between IVL Dhunseri and Indorama to Guangdong IVL Polymer, the same has already been examined in the relevant portion of the present findings. The interested parties have also contended that Reliance Industries Limited is related to certain producers / exporters in Thailand and Malaysia. However, since such producers are not exporting goods from China, the relationship to such producers does not qualify under the exception provided under Rule 2(b). Therefore, the said relationship is irrelevant to the present review investigation.
156. The Authority notes that production of Jindal Polyfilms has correctly not been considered in gross domestic production. Jindal Polyfilms has not yet commenced production of the subject goods.
157. Wankai has alleged that the Authority has adopted a different yardstick for the domestic industry and for the exporter. The Authority views such an allegation with utmost seriousness. The Authority notes that the domestic industry had not provided a non-confidential version of the certificates of accuracy and declaration from consultant. The same were, however, provided to the Authority on a timely basis, in the application. After the interested parties pointed out the deficiencies in the non-confidential version, the Authority directed the domestic industry to resolve the deficiencies in the non-confidential version as well. This is in accordance with the provisions of Rule 7(2), wherein the Authority may require parties providing information on confidential basis, to furnish an appropriate non-confidential version. Further, there is no material error that the Authority has condoned in case of domestic production. The applicants made a typographical error in the name of a domestic producer, which was also clarified prior to initiation of the investigation. However, Wankai has failed to furnish a response for the related exporter to the Authority, within the prescribed timelines. Wankai failed to even bring the correct facts on record before the Authority. The same cannot be equated or compared with a non-furnishing of a document in non-confidential version of the application. Therefore, having regard to the provisions of Rule 6(8) of the Anti-Dumping Rules, the Authority is justified in treating Wankai as non-cooperative.
158. Wankai also contends that the response of Wankai International was filed later as a matter of clarification. However, a clarification can only relate to a fact already on record. An interested party cannot furnish an entirely new response, under the garb of clarification.
159. The Authority holds that documents such as Certificates of Origin, invoice numbers, invoices, etc. cannot be disclosed to Wankai or opposing interested parties. As highlighted by the domestic industry as well, such documents do not pertain to Wankai. The documents pertain to a trader and importer which are parties to the transaction. The

disclosure of such documents can be severely prejudicial to the competitive interests of the parties to the transaction. The domestic industry has highlighted that the information has been provided on utmost assurance of secrecy, including with regard to names of parties. If the names of parties providing such information were to be disclosed, it may create significant procurement challenges for the party concerned, and the party may even face refusal of supply by Wankai, its traders and other suppliers. The Authority notes that good cause has been shown for such information to be treated as confidential. The Authority further notes that the exporters themselves (including Wankai in the present case) do not provide such documents in the non-confidential version of their responses. Therefore, the Authority finds that the confidentiality of information sought is protected expressly under Rule 7 of the Anti-Dumping Rules.

160. Wankai has claimed that the non-disclosure of information is in violation of principles of natural justice, and it has been precluded from defending its interests. In this regard, the Authority notes that anti-dumping investigations are different from adjudication proceedings, in that, confidentiality of certain evidence is expressly protected by Rule 7, in order to safeguard the business interests of parties. In the case of *Union of India vs. Meghmani Organics Limited*, [2016 (340) E.L.T. 449 (S.C.)], relied upon by the exporter itself, the Supreme Court observed that Rule 7 “*permits an exception to the principles of natural justice*”.
161. The provisions of Rule 6(7) emphasized by Wankai are also subject to confidentiality requirements under Rule 7 of the Anti-Dumping Rules. This is evident from the provisions of Rule 7(1) which provides as follows.

*“RULE 7. Confidential information. - (1) **Notwithstanding anything contained in sub-rules (2), (3) and (7) of rule 6**, sub-rule (2) of rule 12, sub-rule (4) of rule 15 and sub-rule (4) of rule 17, the copies of applications received under subrule (1) of rule 5, or any other information provided to the designated authority on a confidential basis by any party in the course of investigation, shall, upon the designated authority being satisfied as to its confidentiality, be treated as such by it and no such information shall be disclosed to any other party without specific authorisation of the party providing such information.”*

162. However, under Rule 7, the interested parties are required to provide an appropriate non-confidential summary of the confidential information. In the present case, Wankai has been provided an appropriate non-confidential summary of the confidential information. The nature of documents or information claimed confidential has been disclosed expressly, that is, import data, Certificates of origin, etc. Further, it has been disclosed that the import data shows that goods identifying Wankai as the manufacturer or bearing grade name of Wankai have been exported by other traders. It has also been disclosed that such imports have been cleared at the duties applicable to Wankai. The volume and value of exports through traders have been provided in the non-confidential version. It has further been disclosed that the Certificates of Origin highlight Wankai as the

manufacturer, and that such Certificates have been issued by CCPIT. The procedure for issuance of Certificates of Origin and the role played by Wankai in such issuance has been explained. It has further been disclosed that the Authority has traced the Certificates of Origin to the DG Systems data and found that the products have actually been imported into India, at the individual duty rate applicable to Wankai. Therefore, Wankai had access to an appropriate non-confidential summary required for defending its interests. However, it has failed to make any arguments on merits.

163. The Authority further notes that the Indian Courts have noted that the principles of natural justice cannot be used as a saving clause, where the complainant itself fails to bring the correct facts on record. The Tribunal, in the case of Kuitun Jinjiang Chemical Industry Co. Ltd. v. Union of India, Final Order No. 50740-50743/2020 dated 5<sup>th</sup> August 2020, noted as follows in this regard.

*“43. It is in the light of the aforesaid facts that the contentions of the producer / exporter regarding violation of the principles of natural justice has to be examined. It is by now well established that the principles of natural justice are not contained in a straight jacket and a litigant cannot complain of the violation of the principles of natural justice if the litigant himself fails to avail opportunity to bring the correct facts to the notice of the authority.”*

164. Further, contrary to the contention of Wankai, the provisions of confidentiality do not exclude confidentiality in relation to information concerning parties, which are not parties to the investigation. Rule 7 provides for confidentiality of any information provided to Authority on confidential basis by any party. The position of the Authority in this regard also finds support in the findings of the WTO Appellate Body in EC – Fasteners (WT/DS397/AB/R). The Appellate Body has noted as follows in this regard.

*“540. In examining the scope of Article 6.5, we note that it extends the need to request confidential treatment to information submitted by "parties to an investigation" rather than those in the specifically defined group of "interested parties". As such, Article 6.5 does not limit the protection afforded to sensitive information to the "interested parties" expressly listed under Article 6.11 of the Anti-Dumping Agreement. In our view, the term "parties to an investigation" refers to any person who takes part or is implicated in the investigation. Moreover, Article 6.11 does not contain an exhaustive list of "interested parties", but states that "'interested parties' shall include" the persons or groups listed in that Article. In our view, the persons expressly listed in Article 6.11 are those who are in every case considered to be "interested parties", but are not the only persons who may be considered "interested parties" in a particular investigation. We do not believe that an investigating authority is relieved of its obligations under Article 6.5 merely because a participant in the investigation does not appear on the list of "interested parties" in Article 6.11. Rather, once "good cause" is shown, confidential treatment of sensitive information must be afforded to any party who takes part or is*

*implicated in the investigation or in the provision of information to an authority. Pursuant to Article 6.5 such parties include persons supplying information, persons from whom confidential information is acquired, and parties to an investigation.*”

Since in the present case, since the confidential information has been acquired from certain parties, the provisions of Article 6.5 and Rule 7 shall apply to such information as well.

165. Wankai also claims that adverse inference cannot be drawn against it, since burden of proof for supplying correct information rests on importers. However, the findings of the Authority rely on several factors and evidences, including evidences such as Certificate of Origin, which identify Wankai as the manufacturer. Therefore, the documentation provided does not relate to importers alone, but is a document issued by Chinese authorities that the goods were manufactured by Wankai.
166. As regards reliance on the use of the word “may” in the Regulations governing issuance of Certificate of Origin, the Authority finds that merely because the Authority “may” verify does not imply that the manufacturer is not required to be identified or is not involved in getting a Certificate of Origin issued. The argument of the domestic industry is not that the premises of the manufacturer were actually verified. The domestic industry has explained that considering that the manufacturer may be verified, it follows that the intervention of the manufacturer is necessary for getting the Certificates issued. Further, the Authority does not find merit in the contention that sample Certificates of Origin does not demonstrate that the goods were manufactured by Wankai. The sample Certificates conclusively demonstrate that goods manufactured by Wankai have been exported by third parties to India, and the imported product was cleared at anti-dumping duty rate applicable to Wankai. However, these transactions have not been reported in the response filed by Wankai. Further, such third party has not been identified by Wankai and the party has not cooperated with the investigation. Thus, the sample Certificates highlight the suppression and misrepresentation of facts by the exporter.
167. The Authority notes that Wankai has failed to provide accurate and adequate information for the purpose of present investigation. Wankai also failed to provide information with regard to Wankai International within a reasonable and stipulated prescribed period. Moreover, by failing to provide information with regard to exports through traders accounting for a significant share of its total exports, it has significantly impeded the investigation. In view of the same, the exporter cannot be found cooperative. The finding of the Authority is also consistent with the past practice in this regard. The fact of whether the landed price determined is comparable or lower than the landed price for Wankai is irrelevant in arriving at this conclusion.
168. With regard to the import data relied upon by the domestic industry and the other evidences, such as Certificates of Origin, or photographic and videographic evidences,

Wankai questions the fact that the domestic industry should not have had access to the information itself. The Authority notes that the very fact that the documents pertain to some other party and domestic industry would not have had access to the information itself shows the sensitivities of the documents. Further, the manner in which the domestic industry got access to such documents is immaterial to the Authority. It might simply be out of relationship between the domestic industry and such party. In any case, the Authority has not relied upon the import information submitted by the domestic industry. As regards the certificate of origin submitted, the domestic industry has submitted the evidence, and the Authority has relied upon the evidence after necessary examination and corroboration. The question of whether the domestic industry should have had access to the documentation or the import data, and the manner in which they procured the same, is not within the scope of the present review.

169. The DGTR calls information from DG Systems in order to cross verify the information, claims and evidence provided by various interested parties, including the domestic industry, the exporters and the importers. The Authority calls information from DG Systems in order to cross verify these claims. The information is provided by DG Systems with the understanding that the same is being provided to the Authority only for the purpose of cross verifying the information in possession of the Authority. The Authority cannot share such information with any interested party, as it contains significant business sensitive information about the exporters and importers, confidentiality of which is protected under various laws in the country.
170. Wankai has also claimed that it did not absorb the anti-dumping duty and the findings of the anti-absorption investigation were incorrect. It is noted that no appeal was filed by Wankai before the appellate authority. In case Wankai was aggrieved with the determination of the Authority, it could have raised the matter before the appropriate appellate authority.
171. The domestic industry has contended that Wankai has misrepresented information from the original investigation itself, including with regard to export of specialized PCN. Wankai has disputed the same. The Authority notes that in case Wankai had exported specialized products, the domestic industry should have raised the issue in the original investigation. The Authority does not find cause to examine possible misrepresentation in an earlier investigation during the present review investigation.
172. Regarding the claim that the determination of dumping margin is an exercise of reasonable approximation, the Authority notes that it is incumbent upon the exporters, domestic industry and interested parties to furnish reliable information before the Authority. In the absence of such reliable information, the Authority cannot accept the information provided.
173. Having found that the producer Wankai is non-cooperative due to failure to furnish accurate and complete information regarding exports of its own manufactured products,

the Authority does not find it necessary to examine whether the response can be accepted, notwithstanding absence of response by related producer of the subject goods, Chongqing Wankai.

174. With regard to the issue that the non-confidential version of the application should be a replica of the confidential version, the Authority notes that the domestic industry has provided a replica of the confidential version vide letter dated 30<sup>th</sup> January 2026.
175. Wankai has also contended that other evidence forming basis of export price have not been disclosed. However, the domestic industry has already provided clarification in this regard. It has clarified that the adjustments, other than export price, have been made as per consistent practice. The quantum of adjustment was disclosed in the non-confidential version of the application. In the same vein, the certificates of accuracy and certificates from consultants have been provided in the non-confidential version provided vide letter dated 30<sup>th</sup> January 2026. The Authority further notes that the non-confidential version also makes it clear that the applicants have not imported the subject goods throughout the injury period. Therefore, the Authority does not find merit regarding the allegation of excessive confidentiality in this regard. As regards factors such as number of employees, details of shutdowns, etc., the Authority has accepted the confidentiality, on good cause having been shown.
176. With regard to the contention that the total Indian production has been claimed confidential, the Authority notes that the domestic industry had provided information with regard to Indian production in its application. Such information has been adjusted to account for actual production of MEPL, which was comparable to the production claimed. Therefore, no prejudice has been caused to any interested party by non-disclosure of the actual information. Further, Wankai has highlighted that certain confidential information was inadvertently disclosed in the disclosure statement issued. The confidential information has been withdrawn vide email dated 19<sup>th</sup> March 2026 sent to all interested parties. The parties have been directed to refrain from making any use of the actual information contained in the disclosure statement and revised disclosure has been issued to all the parties after inserting (\*\*\*) in place of actual number for their possible future use. Since interested parties have already offered comments on the disclosure statement, it was not considered necessary to provide any further opportunity to interested parties to offer comments on the revised disclosure statement, as only certain information has been redacted. Necessary correction has been made in the relevant portion of the present findings.
177. As regards comparison of trend of imports and demand, the Authority notes that the market share of subject imports has increased over the injury period. Therefore, despite the anti-dumping duty, the imports have gained share in the market.
178. With regard to the argument of the domestic industry that the duty should be based on combination of producer and exporter; since the Authority has not treated any producer

as cooperative in the present investigation, the same is not relevant to the present investigation.

**N. CONCLUSIONS**

179. Having examined the submissions made by all interested parties and issues raised therein, and considering the facts available on record, the Authority concludes the following:
- a. The scope of product under consideration is the same as that defined in the original investigation, that is, virgin bottle-grade polyethylene terephthalate resin having intrinsic viscosity of 0.72 deciliters per gram or higher.
  - b. No PCN methodology was adopted for the purpose of the present investigation.
  - c. The domestic industry has produced like article to the imported product under consideration.
  - d. The applicants have not imported the subject goods into India and are not related to exporter or importer thereof.
  - e. The production of all producers has been considered in total Indian production, and Minocha Enterprises Private Limited and Ester Industries Limited are not domestic producers of the like article.
  - f. The applicants constitute a major proportion of the domestic production of the subject goods, and thereby constitute domestic industry under Rule 2(b).
  - g. The interested parties were directed to provide appropriate non-confidential version of the information provided by them. The interested parties complied with the directions, and disclosed additional information. The interested parties explained that certain information could not be disclosed, and provided good cause for the same. Having satisfied itself with the justification provided, the Authority has accepted the confidentiality claimed by various interested parties.
  - h. The response filed by Wankai New Materials Co. Ltd. cannot be accepted since the producer has exported significant volumes through traders, which have not been disclosed to the Authority. Therefore, material information was suppressed and misrepresented in the response filed, as observed in the relevant portion of the findings. The exports through traders have been cleared in the Indian Customs after payment of duty at the individual duty rate applicable to Wankai. The Certificates of Origin provided by the domestic industry and corroborated with the DG Systems data also show that the products were identified as having been produced by Wankai, but were exported by traders. The goods were cleared at the duty applicable to Wankai. Moreover, the response of Wankai International Pte Ltd. was filed belatedly, without due justification or seeking permission from the Authority.
  - i. The dumping margin and injury margin for all producers from the subject country is positive and significant.
  - j. The domestic industry has not suffered injury during the present period of investigation. However, there is likelihood of recurrence of injury, as evident from the following.

- i. The continued dumping of the subject goods, and the absorption of duties previously by Wankai shows that the dumping is likely to continue in the absence of duties.
- ii. The imports have increased at a significantly high rate, notwithstanding the duties in force. Therefore, in the absence of duty, the imports are likely to increase further.
- iii. There are significant capacities in the subject country, and the foreign producers are continuing to add capacities. The idle capacities in the subject country are more than 2.5 times the demand in India.
- iv. The foreign producers have exported to third countries at dumped and injurious prices.
- v. The exports from the subject country are also subject to trade remedial measures in other jurisdictions such as Argentina, Brazil, Canada, the European Union, Japan, Malaysia, South Korea, South African Customs Union, Türkiye and the United States of America.
- vi. There are limited alternative markets available to absorb the additional volume from China PR. Thus, the Indian market shall serve as a lucrative export market, in the absence of duties. The information provided by Wankai also shows that while exports to third countries have declined, the exports to India have increased.
- vii. The trends of exports to other jurisdictions reveal that the foreign producers lose markets when duties are imposed. Once duties lapse, the exports to these jurisdictions show a significant increase. However, in case of India, the exports have increased, notwithstanding the duties.
- viii. India is a price attractive market, as 61% of exports to third countries have been made at lower prices.
- ix. The imports are undercutting the prices of the domestic industry. In the absence of duties, the imports are likely to suppress or depress the prices of the domestic industry.
- x. The domestic industry is in a fragile situation and faced deterioration in performance during 2023-24 due to absorption of duties by Wankai. Considering the same, in absence of duties, the situation of the domestic industry is likely to decline.
- xi. The domestic industry is likely to suffer losses, decline in cash profits and return on investments in the absence of duties.
- k. The domestic industry has not suffered injury due to any other factor.
- l. Imposition of anti-dumping duty are in the larger public interest as can be seen from the following
  - i. None of the users or importers have participated in the investigation, which demonstrates that the users are not adversely affected by the imposition of the duties.
  - ii. The present investigation is a sunset review, and there is no information on record showing adverse impact of past imposition of duty.

- iii. Post imposition of duty, Indorama Yarns Private Limited, Sumilon Industries, Jindal Polyfilms Limited, Uflex Limited and Sparsh Industries have set up capacities in India with a total investment of ₹ 1,500 crores. There have been significant investments in upstream products of PTA and MEG as well, the viability of which depend on downstream products.
- iv. There is no demand-supply gap in the country, for the subject goods. Further, the product can be imported from other countries such as Bangladesh, Brazil, Oman, South Korea, Taiwan, Thailand, Türkiye, and Vietnam.
- v. The impact of duty on the downstream product is negligible.

**O. RECOMMENDATIONS**

180. The Authority notes that the investigation was initiated and notified to all interested parties and adequate opportunity was given to the domestic industry, exporters, importers, users and other interested parties to provide information on the aspects of dumping, injury and the causal link and likelihood of continuation or recurrence of dumping and injury.

181. Having concluded that there is positive evidence of likelihood of continuation of dumping and consequent injury if the existing anti-dumping duty are allowed to cease, the Authority is of the view that the anti-dumping duty in force on imports of the product under consideration from the subject country is required to be continued further. Considering the facts and circumstances of the case, as established hereinabove, the Designated Authority considers it appropriate to recommend continuation of the existing quantum of antidumping duty on imports of subject goods from China PR, except in respect of the foreign producers which have not participated in the current sunset review investigation, or have been found to be non-cooperative, due to failure to provide adequate and accurate information. The non-cooperating producers in this sunset review investigation have been accorded residual duty as applicable at present. The Authority, thus, considers it necessary to recommend continuation of definitive anti-dumping duty, as modified, on all imports of the subject goods, mentioned in column 3, originating in or exported from China PR, equivalent to the amount mentioned as per column 7 in the duty table below, for a further period of five years.

Duty Table

S. no.	Heading	Description	Country of Origin	Country of Export	Producer	Amount	Unit	Currency
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
1	39076110, 39076190, 39076930, and 3907 6990	Polyethylene Terephthalate resin having an intrinsic viscosity of 0.72	China PR	Any country including China PR	Any	200.66	MT	USD

S. no.	Heading	Description	Country of Origin	Country of Export	Producer	Amount	Unit	Currency
		decilitres per gram or higher*						
2	-do-	-do-	Any country other than China PR	China PR	Any	200.66	MT	USD

*\* Bottle-grade PET resin, excluding recycled PET resin*

**P. FURTHER PROCEDURE**

182. An appeal against the determination of the Designated Authority in these final findings shall lie before the Customs, Excise and Service Tax Appellate Tribunal in accordance with the relevant provisions of the Act/Rules.



Amitabh Kumar  
Designated Authority