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F. No. 6/21/2026-DGTR
Government of India
Ministry of Commerce & Industry
Department of Commerce
Directorate General of Trade Remedies

IV Floor, Jeevan Tara Building,
Parliament Street, New Delhi
Dated: 13th June, 2026

INITIATION NOTIFICATION

SETU Case ID: AD/OI/022/2026

Subject: Initiation of Anti-Dumping Investigation concerning imports of Resorcinol originating in or exported from China PR and Japan

1. **F. No. 6/21/2026-DGTR:** Atul Limited (hereinafter referred to as the “applicant”) has filed an application before the Designated Authority (hereinafter referred to as the “Authority”), in accordance with the Customs Tariff Act, 1975, as amended from time to time (hereinafter referred to as the “Act”) and the Customs Tariff (Identification, Assessment and Collection of Anti-Dumping Duty on Dumped Articles and for Determination of Injury) Rules, 1995, as amended from time to time (hereinafter referred to as the “Rules”), seeking initiation of an anti-dumping investigation concerning imports of Resorcinol (hereinafter referred to as the “product under consideration” or “subject goods”) originating in or exported from China PR and Japan (hereinafter referred to as the “subject countries”).

2. The applicant has alleged that material injury is being caused to the domestic industry due to the alleged dumped imports of the subject goods originating in or exported from the subject countries and has requested for imposition of anti-dumping duty on imports of the subject goods from the subject countries.

A. PRODUCT UNDER CONSIDERATION

3. The product under consideration is Resorcinol.

4. The product under consideration is also known as 1,3-Benzenediol, 1,3-Dihydroxybenzene and Meta-Dihydroxybenzene. The chemical formula of the product is C₆H₆O₂ and its CAS Number is 108-46-3. The product is generally supplied in the form of white to off-white flakes and is water soluble.

5. The product under consideration is primarily used as an intermediate in the manufacture of tyre and rubber products and in resin bonding applications. It is also used in the manufacture

of specialised wood adhesive resins, UV stabilizers, dyes, pharmaceuticals, cosmetic preparations and flame-retardant applications.

6. The product under consideration can be manufactured through the following processes:

- i. Sulphonation-fusion process;
- ii. Hydroperoxidation process; and
- iii. MPDA hydrolysis process.

7. The applicant has submitted that the subject goods produced through the various manufacturing processes possess comparable characteristics, meet the same technical specifications and are interchangeable in commercial applications. The applicant manufactures the subject goods through the sulphonation-fusion process.

8. The unit of measurement considered for the present investigation for the product under consideration is Metric Tons (MT).

9. The product under consideration is classified under tariff item 2907 21 00 of the First Schedule to the Customs Tariff Act, 1975. The customs classification is indicative only and is not binding on the scope of the present investigation.

10. Interested parties may provide comments on the scope of the product under consideration and propose Product Control Numbers (PCNs), if any, along with justification therefor, within fifteen (15) days from the date of initiation of the present investigation.

B. LIKE ARTICLE

11. The applicant has stated that there are no significant differences in the subject goods produced by the applicant and those exported from the subject countries. The product produced by the applicant and that imported from the subject countries are comparable in terms of essential product characteristics such as physical and chemical characteristics, functions and uses, product specifications, pricing, distribution and marketing, and tariff classification of the subject goods. The subject goods imported from the subject countries and the goods manufactured by the applicant are technically and commercially substitutable. Thus, for the purpose of initiation of the present investigation, the goods produced by the applicant has been *prima facie* considered as like article to the product being imported from the subject countries.

C. DOMESTIC INDUSTRY AND STANDING

12. The application has been filed by Atul Limited. The applicant has submitted that it is the sole producer of the like article in India. The applicant has further submitted that it has not imported the subject goods from the subject countries during the period of investigation. The applicant has a related entity in China PR, namely Atul China. However, the applicant has submitted that the related entity did not export the subject goods to India during the period of

investigation. The applicant has also submitted that it is not related to any importer of the subject goods in India.

13. Based on the information available on record, the Authority *prima facie* considers that the applicant constitutes domestic industry within the meaning of Rule 2(b) of the Rules and that the application satisfies the requirements of standing under Rule 5(3) of the Rules.

D. SUBJECT COUNTRIES

14. The subject countries for the present anti-dumping investigation are China PR and Japan.

E. PERIOD OF INVESTIGATION (POI)

15. The period of investigation ("POI") for the present investigation is from 1st January 2025 to 31st December 2025 (12 months). The injury investigation period covers the periods 2022-23, 2023-24, 2024-25 and the POI.

F. BASIS OF ALLEGED DUMPING

i. Normal value for China

16. The applicant has submitted that China PR should be treated as a non-market economy country and that producers from China PR should be directed to demonstrate that market economy conditions prevail in the industry with regard to the production and sale of the subject goods. Unless such producers demonstrate that market economy conditions prevail, normal value for China PR is required to be determined in accordance with Annexure-I of the Rules.

17. For the purpose of the present initiation, the Authority has considered China PR to be a non-market economy and determined normal value for China PR based on price payable in India, in the absence of information on record for determining normal value on any other basis. The normal value has been constructed based on the cost of production in India, duly adjusted for selling, general and administrative expenses, with reasonable profit.

ii. Normal value for Japan

18. The applicant has submitted that reliable information regarding domestic selling prices and actual cost of production of the subject goods in Japan was not available. Accordingly, the applicant could not determine normal value on the basis of domestic selling prices prevailing in Japan or on the basis of exports from Japan to an appropriate third country.

19. For the purpose of the present initiation, in the absence of reliable information regarding domestic selling prices or cost of production of the subject goods in Japan, the Authority has determined normal value for Japan on the basis of best available information. The normal value

has been constructed based on the cost of production in India, duly adjusted for selling, general and administrative expenses, with reasonable profit.

iii. Export price

20. The applicant has determined the export price based on import information available on record. For the purpose of initiation, DG Systems import data has been considered for determination of the export price. Appropriate adjustments have been made, wherever claimed and considered necessary, on account of ocean freight, marine insurance, commission, bank charges, credit cost, port expenses and inland freight to arrive at the ex-factory export price.

21. The net export price so determined is considered appropriate for the purpose of initiation of the present investigation.

iv. Dumping Margin

22. The normal value and the export price have been compared at the ex-factory level, which *prima facie* indicates that the dumping margin in respect of the subject goods from the subject countries is above the *de minimis* level and is significant. Accordingly, there is sufficient *prima facie* evidence that the subject goods originating in or exported from the subject countries are being dumped in the Indian market.

G. INJURY AND CAUSAL LINK

23. The applicant has submitted *prima facie* evidence regarding significant volume of imports from the subject countries, price undercutting, price suppression and price depression caused by the subject imports. The applicant has further submitted that profitability, cash profits and return on capital employed have deteriorated during the injury period. The information available on record *prima facie* indicates that the domestic industry has suffered material injury due to the allegedly dumped imports from the subject countries. The applicant has also claimed the existence of a causal link between the alleged dumped imports and the injury suffered by the domestic industry.

H. INITIATION OF THE INVESTIGATION

24. On the basis of the duly substantiated application filed by the applicant and having satisfied itself, on the basis of the *prima facie* evidence submitted by the applicant, regarding dumping of the subject goods originating in or exported from the subject countries, injury to the domestic industry and causal link between the alleged dumped imports and the injury suffered by the domestic industry, and in accordance with Section 9A of the Act read with Rule 5 of the Rules, the Authority hereby initiates an anti-dumping investigation to determine the existence, degree and effect of the alleged dumping of the subject goods originating in or exported from the subject countries and to recommend the appropriate amount of anti-dumping duty which, if levied, would be adequate to remove the injury to the domestic industry.

I. PROCEDURE

25. The provisions contained in Rule 6 of the Rules shall be followed in the present investigation.

J. SUBMISSION OF INFORMATION

26. All information, questionnaires, and submissions for this investigation must be filed through the **SETU Portal only** within the deadlines specified in this notification. The Authority may not consider submissions sent via email or any other method.

27. In order to participate in the investigation, all interested parties are required to register themselves on the SETU Portal (<https://setudgtr.gov.in>). In case of any difficulty in registering as an interested party, the DGTR's SETU Helpdesk may be contacted through the details provided at <https://setu.dgtr.gov.in/help-desk>. All communications and submissions from the interested parties must be filed through the SETU Portal under their registered name and the corresponding Case ID mentioned above. Interested parties are required to ensure that the narrative part of the submissions is filed in searchable PDF/MS Word format, while the data files must be submitted in MS Excel format with properly linked calculations.

28. The known producers/ exporters in the subject countries, the governments of the subject countries through their embassies in India, the importers and users in India known to be concerned with the subject goods are being informed separately to enable them to file all the relevant information in the form and manner prescribed within the time limits set out below. All such information must be filed in the form and manner prescribed by this initiation notification, the Rules, and the applicable trade notices issued by the Authority.

29. Parties interested in the investigation are hereby advised to intimate their interest (including the nature of interest) in the instant investigation and file their questionnaire response/submissions within the time limits mentioned in this initiation notification.

30. Any interested party may make submissions relevant to the present investigation in the form and manner prescribed within the time limits specified in this notification. Any party making any confidential submission before the Authority is required to simultaneously file a non-confidential version of the same. The non-confidential version should be a replica of the confidential version.

31. Interested parties are further directed to regularly visit the official website of the Directorate General of Trade Remedies (<https://www.dgtr.gov.in/>) and SETU portal (<https://setu.dgtr.gov.in>) for any updated information with respect to this investigation. Interested parties are directed to regularly visit the website of DGTR to stay apprised with the further developments in the subject investigation and remain informed regarding notices that may be issued from time to time regarding questionnaire formats, PCN methodology, PCN

discussions/meeting schedule, notice for oral hearing, disclosure, corrigendum, amendment notifications, final finding and other such information.

K. TIME LIMIT

32. The confidential version (CV) and the non-confidential version (NCV) must be uploaded in the respective designated sections of SETU portal within 37 days from the date on which the non-confidential version of the application filed by the domestic industry would be circulated by the Authority or transmitted to the appropriate diplomatic representative of the exporting countries as per Rule 6(4) of the Rules, 1995. If no information is received within the prescribed time limit or the information received is incomplete, the Authority may record its findings on the basis of the facts available on record in accordance with the Rules.

33. Any party wishing to register as an interested party in the present investigation must register through the SETU Portal and file their questionnaire responses and submissions strictly within the time limits mentioned above in this Initiation Notification.

34. The 15-day period to file comments on the scope of the PUC / PCN methodology shall run concurrently with the time limited mentioned above in this Initiation Notification.

35. Extension due to modification of PUC / PCN: An extension of time by 15 days shall be granted if the Authority, through subsequent notice, modifies the PUC, and PCN that was not previously proposed or is different from the initiation notification. This extension of 15 days shall be granted from date of such notification of modified PUC and prescription of PCN. Extension of time by 15 days stated in this paragraph is not applicable in instances where there is no change in the PUC, and PCN methodology after initiation of investigation. Requests for a further extension of time, beyond 15 days extension (if granted), will ordinarily not be considered except in case of exceptional circumstances, in line with Rule 6(4) of the Anti-Dumping Rules.

36. Any request for an extension must be submitted by the concerned parties through the SETU portal at least 3 days before the original deadline. Requests submitted after this time will not be considered.

L. SUBMISSION OF INFORMATION ON CONFIDENTIAL BASIS

37. Any party making confidential submission or providing information on a confidential basis before the Authority is required to simultaneously submit a non-confidential version of the same information in terms of Rule 7(2) of the Anti-Dumping Rules and in accordance with the relevant trade notices issued by the Authority in this regard. Failure to adhere to the above may lead to rejection of the response/submissions.

38. Whenever you give documents to the Authority (like submissions, questionnaires, or annexures), you must do the following:

1. Upload two versions in the designated section of the SETU portal.: one marked confidential and another marked non-confidential,
2. If your submission has many parts, add an index table that lists all parts and annexures.
3. Ensure page numbering is on every page of your submission.

39. Where the original document is in a language other than English or Hindi, the interested party shall provide a true translation in English or Hindi along with the original document.

40. The “confidential” or “non-confidential” submissions must be clearly marked as “confidential” or “non-confidential” at the top of each page. Any submission made without such marking shall be treated as non-confidential by the Authority, and the Authority shall be at liberty to allow the other interested parties to inspect such submissions.

41. The confidential version must include all information that is inherently confidential, or any information the supplier chooses to mark as confidential. For any information where confidentiality is claimed — whether by its nature or for other reasons — the supplier must also provide a good cause statement. This statement should explain why the information cannot be disclosed.

42. The non-confidential version must be an exact copy of the confidential version, but with all confidential information removed.

- Confidential details should be indexed wherever possible.
- If indexing is not feasible, the confidential parts should be blanked out.
- In cases where confidentiality is claimed, the information should be summarised so that the non-confidential version still conveys the essence without revealing sensitive details.

43. A non-confidential summary must provide sufficient detail to permit a reasonable understanding of the substance of the confidential information submitted in an anti-dumping investigation. The summary cannot be vague and should provide other interested parties with sufficient clarity to understand the essence of the information while protecting sensitive details. In exceptional circumstances where the information cannot be summarized without compromising confidentiality, the submitting party may indicate that the information is not susceptible to summary. In such cases, the party must provide a statement of reasons containing a clear and adequate explanation, consistent with Rule 7 of the Anti-Dumping Rules and the relevant trade notices issued by the Authority, as to why summarization is not possible, to the satisfaction of the Authority.

44. Interested parties are allowed to submit their comments on the confidentiality claims made by other parties within 7 days from the date on which the non-confidential version of the documents is circulated.

45. The Authority has the discretion to either accept or reject a request for confidentiality after examining the nature of the information submitted in an anti-dumping investigation. If the Authority determines that the confidentiality claim is not justified, or if the party providing the information refuses to make it public or to allow its disclosure in a generalized or summarized form, the Authority may disregard such information altogether.

46. Any submission made in an anti-dumping investigation must be accompanied by a meaningful non-confidential version of the information provided. If such a version is not furnished, or if the party fails to provide a valid statement of reasons in accordance with Rule 7 of the Anti-Dumping Rules and the relevant trade notices issued by the Authority to justify the confidentiality claim, the Authority will not take the submission on record.

47. Where the Authority is satisfied that the request for confidentiality is warranted, it shall not disclose such information to any party without the specific authorisation of the party providing the information.

M. INSPECTION OF PUBLIC FILE

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

N. NON-COOPERATION

49. In case any interested party refuses access to, or otherwise does not provide, necessary information within a reasonable period or within the time stipulated by the Authority in this initiation notification, or significantly impedes the investigation, the Authority may declare such party as non-cooperative and record its findings on the basis of the facts available on record and make such recommendations to the Central Government as it deems fit.

Amitabh
Kumar

Digitally signed
by Amitabh
Kumar
Date: 2026.06.18
18:03:07 +05'30'

Amitabh Kumar
Designated Authority