CASE No. AD (SSR)-06/2026

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Government of India
Department of Commerce
Ministry of Commerce & Industry
Directorate General of Trade Remedies

FINAL FINDINGS

Sunset Review Investigation concerning imports of "Sodium Hydrosulphite" originating in or exported from China PR.

Pictographic presentation of Sodium Hydrosulphite

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F. No. 7/10/2026 -DGTR
Government of India
Ministry of Commerce & Industry
Department of Commerce
Directorate General of Trade Remedies
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FINAL FINDINGS
Case No. AD (SSR) - 06/2026
SETU ID - AD/SSR/006/2026

Subject: Sunset review of Anti-dumping Duty on imports of Sodium Hydrosulphite originating in or exported from China PR

F. No. 7/10/2026-DGTR - Having regard to 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 as the "Anti-Dumping Rules" or "the Rules") thereof.

1. The Designated Authority (hereinafter referred to as "Authority") received an application filed by Silox India Private Limited (hereinafter referred to as the "applicant" or the "domestic industry"), on behalf of the domestic industry, seeking initiation of sunset review of anti-dumping duty concerning imports of Sodium Hydrosulphite (the "subject goods" or the "product under consideration") originating in or exported from China PR (hereinafter referred to as "subject country").

2. The original investigation concerning imports of subject goods originating in or exported from the China PR and Korea RP was initiated by the Authority vide Notification No. 6/35/2020-DGTR, dated 16th September 2019. The Authority notified the Final Findings vide Notification No. 6/35/2020-DGTR, dated 14th September 2021 and recommended imposition of anti-dumping duty on imports of subject goods from China PR and Korea RP. Subsequently, the Ministry of Finance imposed anti-dumping duties vide Notification No 71/2021- Customs (ADD), dated 17th December 2021. The anti-dumping duties are set to expire on 16th December 2026.

3. In terms of Section 9A (5) of the Act, read with Rule 23(1B) of Rules, anti-dumping duty imposed shall, unless revoked earlier, cease to have effect on expiry of five years from the date of such imposition and the Authority is required to review, whether the expiry of duty in force is likely to lead to continuation or recurrence of dumping and injury. In accordance with the above, the Authority is required to review, on the basis of a duly

substantiated request made by or on behalf of the domestic industry, as to whether the expiry of duty is likely to lead to continuation or recurrence of dumping and injury.

4. The applicant filed an application dated 31st January 2026 seeking initiation of sunset review and continuation of anti-dumping duty on imports of Sodium Hydrosulphite from China PR. While the existing anti-dumping duty covered imports from China PR and Korea RP, the applicant sought continuation of duty only against China PR, as imports from Korea RP had ceased during the injury period and the information on record did not indicate likelihood of recurrence of dumping and injury from Korea RP. Accordingly, the present review has been restricted to imports from China PR.

5. In view of the duly substantiated application with prima facie evidence substantiating likelihood of continuation or recurrence of dumping and injury, in accordance with Section 9A (5) of the Act, read with Rule 23 of the Rules, the Authority issued a public notice initiating the sunset review of anti-dumping duty on imports of the product under consideration from China PR, vide Notification No. 7/10/2026-DGTR, dated 20th March 2026, published in the Gazette of India. The Authority initiated the review of anti-dumping duty imposed earlier to examine whether the expiry of anti-dumping duty on imports of subject goods from China PR is likely to lead to continuation or recurrence of dumping and injury to the domestic industry.

A. PROCEDURE

6. The procedure described below has been followed with regard to the investigation:

6.1. Initiation

i. The Authority received a written application from the domestic industry alleging that expiry of current anti-dumping duties is likely to result in continuation or recurrence of dumping of the subject goods originating in or exported from the subject country and consequent injury to the domestic industry.
ii. The Authority notified the Embassy of the subject country in India about the receipt of the present anti-dumping application before proceeding to initiate the investigation.
iii. In accordance with Rule 6 of the Rules, the Authority issued a public notice dated 20th March 2026, published in the Gazette of India, Extraordinary, initiating anti-dumping investigation concerning imports of subject goods from the subject country.
iv. In accordance with Rule 6(2) of the Rules, 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 in writing within the prescribed time limit.

6.2. Circulation of non-confidential version of the application

i. 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.

ii. A copy of the non-confidential version of the application was made available to other interested parties, wherever requested.

6.3. Participation by Exporters of Subject country

i. In accordance with Rule 6(4), the Authority sent exporters' questionnaires to the following producers and exporters of the subject country to seek relevant information.

a. CNSG Anhui Hong Sifang Co. Ltd.
b. Hubei Yihua Chemical Industrial Co. Ltd.
c. Guangdi Maoming Chemical Co. Ltd.
d. Zenith International Group Co. Ltd.
e. Zhejiang Jiacheng Chemicals Co. Ltd.

ii. The Embassy of the subject country in India was requested to advise the exporters/producers from its country to respond to the questionnaire within the prescribed time limit.

iii. None of producers / exporters of the product under consideration from the subject country responded to the exporter's questionnaire, in response to the initiation of the subject investigation.

iv. The Government of China, through its Embassy, was registered as an interested party in the investigation.

6.4. Participation by Importers/Users

i. The Authority forwarded a copy of the initiation notification along with importer's/user's questionnaire to the following known importers/users of the subject goods in India in accordance with Rule 6(4) of the Rules and advised them to make their views known within the prescribed time limit:

a. Colorbox Exim Private Limited
b. Devieegam Dyers
c. Hindprakash Industries Limited
d. KK Global
e. Lupin Limited
f. Mamta Exim Private Limited
g. Niket Impex
h. Ramanand Kidarnath International
i. Shankar Lal Rampal Dye Chem Private Limited
j. Swastik Polyprints Private Limited
k. Vinay Chemoplast Industries

ii. Only Sandeep Organics Private Limited registered itself as an interested party being an importer / user of the product under consideration from subject country.

However, the importer / user did not respond to the relevant questionnaire issued by the Authority, in response to the initiation of the subject investigation or provide any information during the course of the investigation.

6.5. Period of Investigation and Injury Period

i. As noted in the initiation notification, the period of investigation ('POI') for the purpose of the present investigation was considered as 1st October 2024 to 30th September 2025. Accordingly, the injury period covered the years 2022-23, 2023-24, 2024-25 and the period of investigation.

6.6. Further procedure

i. An economic interest questionnaire was issued to all the known producers and exporters, importers, and the domestic industry. The economic interest questionnaire was also shared with the administrative line ministry. However, only the domestic industry filed response to the Economic Interest Questionnaire.

ii. Non-confidential version of the submissions filed by the domestic industry were made available to all interested parties. A list of all the interested parties was uploaded on the DGTR website along with the request therein to all of them to email the non-confidential version of their submissions to all the other interested parties.

iii. 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.

iv. In accordance with Rule 6(6) of the Rules, the Authority provided an opportunity to the interested parties to present their views orally in a hearing held on 30th July 2026. The parties presented their views in the oral hearing were directed to make written submissions of the views expressed orally, followed by rejoinder submissions.

v. In accordance with Rule 6(8) of the Rules, wherever an interested party has refused access to or has otherwise not provided necessary information in a timely manner during the course of the present proceedings, or has significantly impeded the investigation, such parties have been considered as non-cooperative and recorded the findings on the basis of the facts available.

vi. In accordance with Rule 7 of the Rules, the information provided by the interested parties on confidential basis was examined with regard to the sufficiency of such confidentiality claims. On being satisfied, the confidentiality claims have been accepted wherever warranted and such information has been considered as confidential and not disclosed to the 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.

vii. In accordance with Rule 8, during the course of the investigation, accuracy of the information supplied by the domestic industry has been verified, which forms the basis of these final findings. The information was verified to the extent possible and verified the data submitted by the domestic industry to the extent considered relevant, practicable and necessary.

viii. The non-injurious price determined as per the optimum cost of production and cost to make & sell the subject goods in India, based on the information furnished by the domestic industry and having regard to Generally Accepted Accounting Principles 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.

ix. 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 these final findings.

x. A disclosure statement dated 09.09.2026 was issued by the Authority, in accordance with Rule 16 of the Anti-Dumping Rules disclosing the essential facts under consideration in the matter relating to the present anti-dumping investigation. The comments to disclosure statement received from the interested parties have been considered, to the extent found relevant and non-repetitive, in these final findings.

xi. '***' in these final findings statement represents information furnished by an interested party on a confidential basis and so considered under the Rules.

xii. The exchange rate adopted by the Authority for the subject investigation is **1 US$ = ₹ 86.76**, being the average of the exchange rates notified by the Central Board of Indirect Taxes and Customs under Section 14 of the Customs Act, 1962 for conversion of the value of imported goods, in force during the period of investigation. The same rate has been applied throughout this disclosure statement. Source: https://foservices.icegate.gov.in/#/services/viewExchangeRate

B. PRODUCT UNDER CONSIDERATION

B.1 Submissions by the other interested parties

7. No submissions/comments were received from any other interested party in this regard.

B.2 Submissions by the domestic industry

8. The domestic industry has made the following submissions with regards to the product under consideration and like article.

   a. The product under consideration is Sodium Hydrosulphite, whether produced using Zinc or Sodium Formate. It is also known as Hydrosulphite Concentrate, Sodium Dithionite, Sodium Hydrosulfite or SHS. Its crystalline chemical formula is $Na_2S_2O_4$.

   b. Sodium Hydrosulphite is widely used in diverse industrial sectors as a chemical or additive by the downstream users and does not constitute a feedstock/raw material for any user industry.

c. There is no requirement for adoption of PCN methodology in the present case. While the subject goods are produced and sold in different concentrations, such differences do not lead to a significant change in the cost of production.

d. The product produced by the domestic industry is like article to the imported product under consideration.

B.3 <u>Examination by the Authority</u>

9. The product under consideration in the present investigation is “Sodium Hydrosulphite”. Since the present investigation is a sunset review, the scope of the product under consideration as determined by the Authority in the final findings of the original investigation and considered at the stage of initiation of the present review is as below –

> *“7. The product under consideration in the present investigation is “Sodium Hydrosulphite”, whether produced using Zinc or Sodium Formate, is also known as “Hydrosulphite Concentrate” or “Sodium Dithionite” or “Sodium Hydrosulfite” or “SHS”. It is a white or grayish white powder, free from visible foreign particles with pungent odour. Its crystalline chemical formula is* $Na_2S_2O_4$.
>
> *8. The product under consideration is produced using either “Zinc Process” or “Sodium Format Process”. The former process involves reaction of zinc dust with sulphur dioxide and converting the resultant zinc salt to sodium hydrosulphite in the presence of caustic soda and soda ash. The latter process involves the reaction of caustic soda and sulphur dioxide with sodium format in a methanol solution to produce sodium hydrosulphite.”*

10. The product under consideration is classified under Chapter 28 of Schedule I of the Customs Tariff Act, under tariff codes 2831 1010 and 2832 1020. The Customs classification is indicative only and is not binding on the scope of the product under consideration.

11. The product under consideration is produced and sold in terms of weight, expressed in metric tons (MT), and the same has been adopted for this investigation.

12. No request for adoption of PCN methodology was made during the course of the present investigation. The domestic industry has highlighted that while Sodium Hydrosulphite is produced and sold in different concentrations, the same does not result in differences in the cost of production of the product. Further, no PCN had been framed in any of the past investigations. Therefore, no PCN methodology has been adopted for the purpose of the present investigation.

13. The Authority notes that there are no significant differences in the products produced by the domestic industry and the goods imported from the subject country. The subject goods produced by the domestic industry and that imported from the subject country are

comparable in terms of physical & chemical properties, manufacturing process & technology, functions & uses, product specifications, pricing, distribution & marketing and tariff classification of the goods. The products produced by the domestic industry and that imported from the subject country are being used interchangeably by the consumers. Accordingly, it is held that Sodium Hydrosulphite produced by the domestic industry is 'like article' to the product under consideration imported from the subject country in terms of Rule 2(d) of the Rules.

C. SCOPE OF DOMESTIC INDUSTRY AND STANDING

C.1 Submissions by the other interested parties

14. No submissions/comments were received from any other interested party in this regard.

C.2 Submissions by the domestic industry

15. The domestic industry has made the following submissions with respect to the domestic industry and standing:
    a. The applicant, Silox India Private Limited, has not imported the subject goods from subject country during the period of investigation, and are not related to any exporter or importer of the product under consideration from subject country.
    b. There are 4 other producers of the subject goods in the country.
    c. The application has been supported by Demosha Chemicals Private Limited, Gulshan Chemicals Limited and Kutch Chemicals Industries Limited.
    d. The applicant accounts for a major proportion in the total domestic production for the subject goods in the country and is eligible to constitute domestic industry.

C.3 Examination by the Authority

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

    "(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 constructed as referring to the rest of the producers."

17. The present application has been filed by Silox India Private Limited. It is noted that the applicant is not related to any exporter of the subject goods in the subject country or importer of the subject goods in India. Further, the applicant has not imported the subject goods from the subject country during the period of investigation.

18. There are four other domestic producers of the like article in India, as listed below.
    a. Demosha Chemicals Private Limited
    b. Gulshan Chemicals Limited
    c. Kutch Chemicals Industries Limited
    d. TCP Limited

19. The application has been supported by Demosha Chemicals Private Limited, Gulshan Chemicals Private Limited and Kutch Chemicals Industries Limited. Considering the production of the application and other Indian producers, it is noted that the applicant accounts for 52% of the total Indian production. Further, the production of applicant and the supporters account for 86% of the total Indian production, as can be seen from the table below.

Name of the producer	Production (MT)	Share (in %)
Applicant	***	**52%**
Supporters	***	***
a. Demosha Chemicals Private Limited	***	***
b. Gulshan Chemicals Limited	***	***
c. Kutch Chemicals Industries Limited	***	***
Applicant + Supporters	***	**86%**
Range		80%-90%
Other Indian producer	***	***
Range		10%-20%
Total Indian production	***	***

20. In view of the above, and after due examination, the Authority holds that the applicant constitutes domestic industry under Rule 2(b) of the Rules. Further, the application satisfies the criteria of standing in terms of Rule 5(3) of the Rules.

D. MISCELLANEOUS ISSUES AND CONFIDENTIALITY

D.1 Submissions by the other interested parties

21. No submissions/comments were received from any other interested party in this regard.

D.2 Submissions by the domestic industry

22. No submissions have been made by the domestic industry with regard to confidentiality, or other miscellaneous issues.

D.3 Examination by the Authority

23. The non-confidential version of the information provided by the domestic industry was available to all interested parties as per Rule 6(7) and Trade Notice 10/2018 dated 7th September 2018 read with Trade Notice 1/2013 dated 9th December 2013.

> *"Confidential information: (1) Notwithstanding anything contained in sub-rules (2), (3) and (7) of rule 6, sub-rule(2) of rule12,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 authorization of the party providing such information.*
>
> *(2) The designated authority may require the parties providing information on a confidential basis to furnish a non-confidential summary thereof and if, in the opinion of a party providing such information, such information is not susceptible to summary, such party may submit to the designated authority a statement of reasons why summarization 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 generalized or summary form, it may disregard such information."*

24. The claims made by the domestic industry, to the extent considered relevant, were examined by the Authority and addressed accordingly. It is seen that the domestic industry has claimed confidentiality on various information, such as, production, capacity, capacity utilization, sales volumes, market share, stocks, selling price, costs, profits, cash profits, return on investment, non-injurious price, cost of production related information, normal value based in cost of production, dumping margin, injury margin, etc. It is also seen that wherever information is for the injury period, the same has been provided on an indexed basis. Information such as normal value, non-injurious price and price undercutting has been disclosed in the range. Further, the domestic industry has also claimed confidentiality on various supporting documents & information, wherever such information has not been publicly disclosed by them. The domestic industry has claimed that non-confidential summary of such information cannot be provided since these documents are not susceptible to summary.

25. The information provided by the domestic industry on a confidential basis was examined with regard to sufficiency of such claims. On being satisfied, the Authority has accepted the confidentiality claims, wherever warranted, and such information has been considered confidential and not disclosed to other interested parties. Wherever possible,

the domestic industry was directed to provide sufficient non confidential versions of the information filed on a confidential basis.

E. DETERMINATION OF NORMAL VALUE, EXPORT PRICE AND DUMPING MARGIN

E.1 Submissions by the other interested parties

26. No submissions/comments were received from any other interested party in this regard.

E.2 Submissions by the domestic industry

27. The domestic industry has submitted as under with regard to the determination of normal value, export price and dumping margin.
    a. China PR should be treated as a non-market economy, and the normal value should be determined based as per Para 7 of the Annexure I.
    b. In the present case, European Union can be considered as an appropriate market economy third country, since it is one of the major producers and exporters of SHS globally, manufacturing scale in EU is comparable to China and both countries are among the largest economies in the world.

E.3 Examination by the Authority

28. Under Section 9A (1)c, 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

(b) 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);

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."*

29. The Authority sent questionnaires to the known producers/exporters from the subject country, advising them to provide information in the prescribed form and manner. However, no producer / exporter from the subject country has cooperated in the present investigation by filing a questionnaire response. The normal value and export price for all producers/exporters from the subject country, have, therefore, been determined as below.

E.3.1 Normal value for China PR

30. 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."

31. 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 under with regard to production and sale of the product under consideration. It has been stated that in case the responding Chinese producers are not able to demonstrate that their cost 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.

32. It is noted that while the provision contained in Section 15 (a)(ii) has expired on 11th December, 2016, the provision under Article 2.2.1.1 of WTO Anti-dumping Agreement read with the obligation under Section 15(a)(i) of the Accession Protocol require criterion stipulated in paragraph 8 of Annexure I of the AD Rules to be satisfied through the information/data to be provided in the supplementary questionnaire on claiming market economy treatment. In the present case, no producer from China has participated in the investigation by furnishing a response. Accordingly, the normal value has been determined in accordance with paragraph 7 of Annexures 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."

33. The domestic industry has submitted that the European Union should be considered an appropriate market economy third country. In support of this claim, it has stated that, apart from China PR, the European Union is one of the major producers and exporters of SHS; that the scale of manufacturing in the two countries is comparable, with producers in both countries having significant production capacities; and that both are among the largest economies in the world. However, the domestic industry has not provided sufficient justification or supporting evidence to establish the appropriateness of the European Union as a market economy third country for the present purpose. Accordingly, the Authority is unable to consider the European Union as an appropriate market economy third country. In the absence of any other relevant information on record, the Authority has determined the normal value on the basis of the price payable in India, derived from the cost of production of the domestic industry, duly adjusted for selling, general and administrative expenses and a reasonable amount of profit. The normal value so determined is set out in the dumping margin table below.

E.3.2 Export price for China PR

34. In absence of participation from the producers/exporters from the subject country, the export price has been determined on the basis of facts available in terms of Rule 6(8) of the Rules. For this purpose, information as per the DG Systems data has been considered. Price adjustments have been made on account of ocean freight, inland transportation, port related expenses, insurance, credit cost, bank charges and commission on the basis of facts available. The ex-factory export price so determined is mentioned in the dumping margin table below.

E.3.3 Dumping margin

35. Based on normal value and export price determined as above, the dumping margin has been determined below.

Dumping margin table

Particular	Normal Value	Export Price	Dumping Margin	Dumping Margin	Dumping Margin
	(USD/MT)	(USD/MT)	(USD/MT)	%	Range
Any producer	***	***	***	***	40-50

F. ASSESSMENT OF INJURY, LIKELIHOOD OF CONTINUATION OR RECURRENCE OF INJURY AND CAUSAL LINK

F.1. Submissions by the other interested parties

36. Since, no other interested party participated in this investigation, therefore, no comments/submissions have been received.

F.2. Submissions by the domestic industry

37. The domestic industry has made the following submissions with regards to injury, likelihood of continuation or recurrence of injury and causal link.
    a. Imposition of anti-dumping duties has had a positive impact on the Indian industry, with new domestic producer starting operations after imposition of duty.
    b. During the injury period, the domestic industry was insulated from dumping due to presence of anti-dumping duty and it did not suffer injury. However, in case the duty is allowed to expire, there is a likelihood of recurrence of injury to the domestic industry.
    c. In case where the anti-dumping duty has had the desired effect of improvement in the economic parameters of the domestic industry, the Authority is required to examine whether injury is likely to recur in the event of cessation of duty, as held by the CESTAT in the case of P.T. Asahimas Chemicals vs. DA.
    d. The volume of imports declined gradually post imposition of duties but were almost negligible in 2024-25 and in the period investigation as the exporters intentionally curtailed exports in anticipation of the present sunset review.
    e. The subject imports were almost negligible during the period of investigation but increased significantly post the period of investigation. In fact, imports during April -June 2026 on annualised basis are significantly higher than imports during 2022-23.
    f. The exporters from the subject country have, regularly in the past, reduced imports once duties are imposed. However, once duties expire, the volume of imports increases sharply.
    g. The Chinese producers have the capacity and commercial interest to supply in the Indian market and can rapidly increase exports in absence of anti-dumping duty.
    h. The subject goods are commodity products and consumer purchases depends on the cheapest option available in the market. Therefore, in absence of anti-dumping duty, domestic industry will suffer material injury.
    i. The exporters in the subject country have a tendency to dump. In the past investigations, the Authority consistently found the exporters to have engaged in dumping at significant margins.
    j. The Chinese producers have significant production capacities, and the subject goods are likely to be diverted to Indian market in case of cessation of duty.
    k. For instance, just 4 producers of subject goods in China have capacity which is 652% greater than the entire demand in India.

l. During the period of investigation, the Chinese exporters were exporting the goods to 69 countries, with 100% of the goods being exported at dumped prices. The dumping margin for exports to such third countries was as high as ***%.

m. During the period of investigation, ***% of all exports from China to third countries were at injurious prices.

n. ***% of exports from China to third countries were at prices lower than price prevailing in India, making India a very lucrative market for the Chinese producers.

o. The volume of exports to third countries at dumped and injurious prices is twice the entire demand in India and diversion of such exports to India will remove the domestic industry from the market.

p. Foreign producers are engaging in unfair trade practices in other markets as well, which is evident from the fact that Korea has recently imposed anti-dumping duty on imports of subject goods from China.

q. Imposition of anti-dumping duty by Korea has restricted access to a significant market for China, implying that subject goods are likely to be diverted to India.

r. In case of cessation of duty, the domestic producers will not be able to compete with the prices of subject imports.

s. To compete with the subject imports, the domestic producers will have to reduce their prices resulting in severe decline in profitability parameters, cash losses, negative return on investment and material injury to the domestic industry.

F.3. Examination by the Authority

38. The Authority has examined the arguments and submissions made with regards to injury, causal link and likelihood of continuation or recurrence of dumping and injury to the domestic industry in case of expiry of anti-dumping duty. The analysis of the Authority hereunder addresses the various submissions made.

39. The Authority notes that in the present investigation, the domestic industry has not claimed injury due to the dumped imports from the subject country. The domestic industry has submitted that due to the presence of the duty, its economic parameters have witnessed improvement and thus, it is not suffering injury currently. However, the domestic industry has submitted that there is a need for continuation of anti-dumping duty as there is a likelihood of continuation of dumping and recurrence of consequent injury to the domestic industry in case of expiry of the present anti-dumping duty in force.

40. The domestic industry had small volume of captive consumption of the subject goods during the entire injury period. In view of insignificant captive consumption ***MT in relation to demand ***MT for the product in the country, the Authority has ignored the captive consumption for the purpose of injury analysis.

F.3.1 Volume effect of dumped imports

a. Assessment of demand/consumption

41. The Authority has determined demand or apparent consumption of the product in India as the sum of domestic sales of the domestic industry, other producers and imports of subject goods from all sources.

Particulars	**Unit**	**2022-23**	**2023-24**	**2024-25**	**POI**
Excluding captive consumption					
Domestic Industry	MT	***	***	***	***
Range	Indexed	100	98	103	109
Other producers	MT	***	***	***	***
Range	Indexed	100	120	121	121
Imports from China	MT	2,425	1,258	18	23
Other imports	MT	216	504	180	0
Total demand	MT	***	***	***	***
Range	Indexed	100	107	106	109

42. It is seen that the demand for the subject goods has increased over the injury period.

b. Imports in absolute and relative terms

43. With regards to the volume of dumped imports, the Authority is required to consider whether there has been a significant increase in the dumped imports, either in absolute terms or relative to production or consumption in India. For the purpose of the injury analysis, the Authority has relied on the DG Systems import data. The information is as below.

Particulars	**Unit**	**2021-22**	**2022-23**	**2023-24**	**POI**
Subject imports	MT	2,425	1,258	18	23
Other imports	MT	216	504	180	0
Total imports	MT	2,641	1,762	198	23
Indian production	MT	***	***	***	***
Trend	Indexed	100	105	111	113
Indian consumption	MT	***	***	***	***
Trend	Indexed	100	107	106	109
Subject imports in relation to					
Indian production	%	***	***	***	***
Trend	Indexed	100	49	1	1
Indian consumption	%	***	***	***	***
Trend	Indexed	100	48	1	1
Total imports	%	91.82%	71.39%	9.09%	99.88%

44. It is seen that -

   i. The volume of subject imports has declined following the imposition of the anti-dumping duty.

ii. During the period of investigation, the subject imports were negligible.
iii. Similarly, the volume of subject imports, both in relation to Indian production and consumption, has declined over the injury period.

45. While volume of imports declined significantly in the period of investigation, it is seen that the same has once again increased significantly (48.9 MT in Oct'25 to Jan'26) or 147 MT on annualised basis, that is, increase of more than 500%, in the post-POI period.

F.3.2 Price effect of the dumped imports

46. In terms of Annexure II (ii) of the Rules, with regard to the effect of the dumped imports on prices, the Authority is required to consider whether there has been a significant price undercutting by the dumped imports as compared with the price of the like product in India, or whether the effect of such imports is otherwise to depress prices to a significant degree or prevent price increases, which otherwise would have occurred, to a significant degree.

a. Price undercutting

47. Price undercutting has been determined by comparing the net sales realization of the domestic industry with the landed price of the imports for the period of investigation.

Particulars	Unit	Value without ADD	Value with ADD
Import volume	MT	23	23
Landed price	₹/MT	91,044	1,29,220
Selling price	₹/MT	***	***
Price undercutting	₹/MT	***	***
Price undercutting	%	***	***
Price undercutting	Range	5-15%	(20-30)

48. It is seen that the landed price of the subject imports was below the selling prices of the domestic industry during the period of investigation. However, since the price difference was small, it is seen that the imports were no longer lucrative when compared with the price of the domestic industry because of the anti-dumping duty in place. Resultantly, the volume of imports fell sharply, reflecting the impact of anti-dumping duty.

49. It is further seen that the landed price of the subject imports was below the selling prices of the domestic industry during the period of investigation if ADD is not taken into account and thus, the price undercutting becomes positive and significant.

b. Price suppression and depression

50. In order to determine whether the dumped imports are depressing the domestic prices and whether the effect of such imports is to suppress prices to a significant degree or prevent price increases which otherwise would have occurred in normal course, the changes in the costs and prices are compared below.

Particulars	**Unit**	**2021-22**	**2022-23**	**2023-24**	**POI**
Cost of sales	₹/MT	***	***	***	***
Trend	Indexed	100	84	77	80
Net sales realization	₹/MT	***	***	***	***
Trend	Indexed	100	79	65	67
Landed price	₹/MT	1,03,602	79,577	87,876	91,044

51. It is seen that the selling price of the domestic industry declined significantly over the injury period, indicating clear price depression. The cost of sales also declined over the same period. However, between 2023-24 and the POI, the cost of sales increased by about ₹***/MT, whereas the net sales realization increased by only about ₹***/MT. Thus, while the overall injury period primarily shows price depression, there is also a price suppression during the POI, as the domestic industry was unable to increase its selling price fully in line with the increase in its cost of sales.

F.3.3 Economic parameters of the domestic industry

52. Annexure II to the Rules provide that the examination of the impact of the dumped imports on the domestic industry should include an objective and 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, the magnitude of the margin of dumping; actual and potential negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital investments. The various injury parameters relating to the domestic industry are discussed below.

a. Production, capacity, capacity utilisation and domestic sales

53. The performance of the domestic industry with regard to capacity, production, sales and capacity utilization during the period of investigation was as below.

Particulars	**Unit**	**2022-23**	**2023-24**	**2024-25**	**POI**
Installed capacity	MT	***	***	***	***
Trend	Indexed	100	105	106	106
Production	MT	***	***	***	***
Trend	Indexed	100	94	104	109
Capacity utilisation	%	***	***	***	***

Trend	Indexed	100	89	98	103
Domestic sales	MT	***	***	***	***
Trend	Indexed	100	98	103	109

54. It is noted that –
   i. The domestic industry has enhanced the installed capacity for the subject goods over the injury period, though the capacity addition is quite small.
   ii. Production and capacity utilization of the domestic industry declined in 2023-24 but has increased thereafter and over the injury period.
   iii. As the volume of subject imports has declined consequent to imposition of duties, the sales of the domestic industry increased over the period.

b. Market share

55. The Authority has examined the effect of the dumped imports on the market share of the domestic industry, and imports from subject country and other countries as under.

Particulars	**Unit**	**2022-23**	**2023-24**	**2024-25**	**POI**
Domestic industry	%	***	***	***	***
Trend	Indexed	100	91	97	101
Other domestic producers	%	***	***	***	***
Trend	Indexed	100	112	114	112
Subject imports	%	5.3%	2.58%	0.04%	0.05%
Other imports	%	0.48%	1.03%	0.38%	0.00%

56. The market share of the domestic industry remained broadly stable during the injury period, while the market share of other Indian producers increased. At the same time, the market share of subject imports declined significantly and became negligible during the POI.

c. Inventories

Particulars	**Unit**	**2022-23**	**2023-24**	**2024-25**	**POI**
Opening inventory	MT	***	***	***	***
Closing inventory	MT	***	***	***	***
Average inventory	MT	***	***	***	***
Trend	Indexed	100	168	135	89

57. The average inventories of the domestic industry increased in 2023-24, but have declined thereafter and over the injury period, as the sales of the domestic industry increased.

d. Profitability, cash profit and return on capital employed

58. The performance of the domestic industry has been examined in respect of profits, cash profits, and return on investment.

Particulars	UOM	2022-23	2023-24	2024-25	POI
Cost of sales	₹/MT	***	***	***	***
Trend	Indexed	100	84	77	80
Net sales realization	₹/MT	***	***	***	***
Trend	Indexed	100	79	65	67
Profit/ (loss)	₹ Lacs	***	***	***	***
Trend	Indexed	100	55	17	16
Profit/ (loss)	₹/MT	***	***	***	***
Trend	Indexed	100	57	17	15
Cash profits	₹Lacs	***	***	***	***
Trend	Indexed	100	65	30	29
Return on capital employed	%	***	***	***	***
Trend	Indexed	100	51	18	16

59. It is seen that –

a. The profitability of the domestic industry has declined over the injury period. The total profits earned and the profit earned per unit have declined.

b. The cash profits of the domestic industry have followed a similar trend and have declined over the injury period.

c. Similarly, the return on capital employed earned by the domestic industry has declined over the injury period.

60. The domestic industry has not claimed that deterioration in these parameters is due to Chinese imports. In any case, since the volume of imports was negligible and the duty-inclusive landed price was above the selling price of the domestic industry, the decline in these parameters cannot be attributed to the imports.

e. Employment, wages and productivity

61. Employment, wages and productivity of the domestic industry over the injury period is given in the table below:

Particulars	Unit	2022-23	2023-24	2024-25	POI
No. of employees	Nos.	***	***	***	***
Trend	Indexed	100	112	112	112
Salaries and wages	₹ Lacs	***	***	***	***
Trend	Indexed	100	115	109	110
Productivity per day	MT	***	***	***	***

Trend	Indexed	100	94	104	109
Productivity per employee	MT	***	***	***	***
Trend	Indexed	100	84	93	98

62. It is noted that the number of employees of the domestic industry increased in 2023-24, and have remained consistent thereafter. The wages paid increased in 2023-24, declined marginally thereafter, but have remained largely consistent. The productivity per day has increased over the period, while the productivity per employee has declined marginally. However, the domestic industry has not claimed injury on this account.

f. Growth

63. The growth of the domestic industry in terms of production, domestic sales volume, profits, cash profits and the return on capital employed during the period of investigation is as per given table below.

Particulars	**Unit**	**2022-23**	**2023-24**	**2024-25**	**POI**
Production	%	-	-6%	10%	5%
Domestic sales	%	-	-2%	6%	6%
Profit / loss	%	-	-45%	-69%	-5%
Cash profits	%	-	-35%	-54%	-4%
Return on capital employed	%	-	-49%	-65%	-9%

64. It is noted that the domestic industry witnessed an improvement in its volume parameters subsequent to imposition of duties. Even though growth in profitability parameters was negative, the same is not due to Chinese imports. Since the volume of imports was negligible and the duty-inclusive landed price was above the selling price of the domestic industry, the decline in price parameters suffered by the domestic industry cannot be attributed to the imports.

g. Ability to raise capital investment

65. The volume of subject imports has declined over the period due to imposition of duties. As a result, the domestic industry has been able to increasingly sell its product in the market at remunerative prices and earn profits. Thus, the ability of the domestic industry to raise capital investment has not been impacted by dumping from China.

h. Factor affecting the domestic prices

66. The domestic industry has been able to sell the product for profits, and the imports have entered the market at competitive prices, post imposition of duties. The landed price of imports, after addition of anti-dumping duty, is above the selling price of the domestic industry. Therefore, the imports have not impacted the prices of the domestic industry.

i. Magnitude of dumping

67. The Authority notes that the subject goods have been exported from China at a price below normal value. The dumping margin is positive and significant. The volume of imports was negligible and was not sufficient to cause material injury to the domestic industry.

j. Magnitude of Injury Margin

68. 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 and data relating to the cost of production for the period of investigation. 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 has been ensured that no extraordinary or non-recurring expenses were charged to the cost of production. A reasonable return (pre-tax) of 22% on the average capital employed, that is to say, the average net fixed assets plus the average working capital, for the product under consideration has been allowed as pre-tax profit to arrive at the non-injurious price, as prescribed in Annexure III to the Rules.

69. The landed price and non-injurious price determined have been compared for the product under consideration. The injury margin determined for the producers/exporters is provided in the table below:

Particular	NIP	Landed price	Injury Margin	Injury Margin	Injury Margin
	($/MT)	($/MT)	($/MT)	%	Range
Any producer	***	***	***	***	15-25

F.3.4 <u>Likelihood of continuation or recurrence of dumping and injury</u>

70. The present investigation is a sunset review of duties on the imports of the product under consideration from China PR. Under the Rules, the Authority is required to determine whether cessation of existing duty is likely to lead to continuance or recurrence of dumping and injury to the domestic industry. The Authority has examined all the relevant information brought on record by the domestic industry and has noted as below.

i. Volume of imports from the subject country

71. The volume of imports has declined over the injury period. During the period of investigation, the volume of imports from China PR was very small and insignificant.

This shows that the Chinese producers are unable to sell the subject goods at fair prices and have had to reduce exports to India to a significant extent. However, the landed price of imports is below the selling price of the domestic industry. Further, as examined elsewhere hereinbelow, the Chinese producers can ship significant volumes in short time. In case of expiry of current anti-dumping duty, the producers in China PR are therefore likely to resume exports of subject goods at dumped prices.

72. The Authority notes in this regard that the product was being exported to India in significant volumes earlier and the same led to imposition of anti-dumping duty vide Notification No. 55/2012-Customs (ADD) dated 14th December 2012. The said imposition of duty resulted in significant decline in exports by the time of 2017. Accordingly, the ADD was not extended further after 13th December 2017. Once the duty ceased, the volume of imports increased so significantly at dumped prices and caused so significant injury to domestic industry that the domestic industry was constrained to once again file application and seek imposition of anti-dumping investigation. After elaborate investigations, the Authority recommended reimposition of anti-dumping (vide final findings of the original investigation of the present sunset review) in view of significant increase in imports at dumped prices causing injury to the domestic industry. The Authority thus notes the likelihood of significant increase in imports in a short duration.

Period	**Import volume (MT)**	**Remarks**
2016-17	43	
2017-18	710	Expiry of duty
2018-19	4,080	
2019-20	6,288	
2020-21	6,070	
2021-22	1,987	Re-Imposition of duty
2022-23	2,416	
2023-24	1,348	
2024-25	66	
POI	23	

ii. Increase in the volume of imports in post-POI period

73. The Authority has examined the transaction-wise import data obtained from DG Systems for the post-POI period from 1st October 2025 to 31st January 2026 and compared the same with the imports recorded during the period of investigation, namely, October 2024 to September 2025. Since the period of investigation covered 12 months whereas the post-POI period covers 123 days, the absolute import quantities for the two periods are not directly comparable. The Authority has, therefore, compared the imports on an annualised basis.

74. During the period of investigation, the volume of subject imports was 23 MT, whereas in the post-POI period, annualised volume of imports was 147 MT. Thus, the rate of imports

increased by approximately 500% after the period of investigation on annualised basis. The post-POI data therefore shows that imports from the subject country have increased in anticipation of expiry of ADD.

Year	**Imports from China (MT)**	
	Actual	**Annualised**
2022-23	2,425	2,425
2023-24	1258	1258
2024-25	18	18
POI	23	23
Post POI (Oct'25-Jan'26)	48.9	147

iii. Chinese producers have long history of dumping

75. The imports of product under consideration from China PR have been subject to anti-dumping investigations in the past. The Authority has consistently found that exporters from China PR have engaged in significant dumping, which is evident from dumping margins determined in the past (as mentioned in the table given below). This shows that the Chinese exporters have a tendency of dumping the subject goods in India.

Investigations	**Date of final findings**	**Dumping Margin (%)**
First anti-dumping investigation	13th September 2001	72 - 86%
First sunset review	6th September 2006	91%
Second sunset review	3rd October 2012	70-80%
Second anti-dumping investigation	14th September 2021	70-80%

iv. Imposition of anti-dumping duty on Chinese exporters by Korea RP

76. Exporters in China have also been found to have dumped the subject goods in Korea RP. As a consequence, Korea RP has recently (on 17th December 2025) imposed anti-dumping duties on imports of subject goods from China at the rate of 12.87-33.97%. This shows that the foreign producers have a tendency to engage in dumping, and are likely to dump in India in the absence of duty.

v. The Indian market is price attractive

77. Based on the global export data as per Trade Map (as submitted by DI), it is seen that during the period of investigation, ***% of the Chinese exports to third countries were at prices lower than prices offered to India. This implies that India is a more price attractive market for the exporters in China, and the Chinese exporters would be willing to export to India at a price even lower than the export price prevailing in the period of

investigation. If the present duty is allowed to cease, exports are likely to be diverted to India, leading to recurrence of injury to the domestic industry.

Particular	Unit	POI
Volume of exports from China to third countries	MT	***
Volume of low-priced exports from China to third countries (as compared to India)	MT	***
Share of low-priced exports in relation to total exports	%	***
	Range	90-100%
Demand in India	MT	***
Low-priced imports in relation to demand	%	***
	Range	200-210%

vi. Chinese producers hold significant capacities

78. The domestic industry has provided evidence as per information available in public domain regarding the known capacities available with the Chinese exporters. It is seen that the producers in China have large production capacities. Further, some Chinese producers individually have capacities in excess of the demand in their country. The capacity with just four producers in China is *** MT which is equal to ***% of the Indian demand. In the event the present duties cease to exist, Chinese producers are very likely to utilize their mammoth capacity by exporting to India, and thereby adversely impacting the domestic industry.

Producer	Capacity (MT)
Yantai Jinhe Sodium Hydrosulfite Factory Co., Ltd.	***
Hubei Yihua Chemical Industry Co., Ltd.	***
Shandong Shuangqiao Chemical Industry Co., Ltd.	***
Guangdi Maoming Chemical Co., Ltd.	***
Total	***
Demand in India	***
Capacities of exporters in relation to demand	***%
Range	650-660

As against the total Indian capacity for PUC of 72,600 MT, the total Indian demand for PUC of 48,837 MT and DI's capacity of 37,000 MT, the total capacities of 4 Chinese producers is 3,20,000 MT which is 655% of total demand for PUC in India. In light of the propensity of the Chinese producers (with significant capacities) to resort to dumping, there is a clear likelihood that Chinese producers will divert those capacities to India and there will be recurrence and continuation of dumping and injury to the DI as per Rule 23(1B) of the Rules, which makes it imperative that anti-dumping duty be recommended for continuation at existing rate.

vii. Likely injury to the domestic industry in case of expiry of duty

79. The imposition of duties has stabilized the current market situation, enabling the domestic industry to remain competitive and profitable. However, if the duties expire, Chinese exporters are likely to resume dumping. Considering the prices at which Chinese exporters are exporting the subject goods to third countries as well as India, the domestic industry will be unable to match those prices and would not remain competitive. This would likely result in financial losses and sudden deterioration in the financial parameters for the domestic industry.

F.3.5 Conclusions on injury and likelihood of continuation or recurrence of dumping and injury

80. In view of the foregoing, the Authority concludes as below.

a. The volume of imports has declined over the injury period, in absolute and relative terms, due to imposition of duties. Imports have however increased in the post-POI period.

b. The landed price of subject imports is below the selling price of the domestic industry, thus showing likelihood of undercutting the prices of the domestic industry, in case the present anti-dumping duties expire.

c. The domestic industry has marginally enhanced its capacities, and its production and capacity utilization have also increased over the injury period.

d. The domestic industry has been able to increase its sales in the absence of dumped imports, and its market share has increased. In contrast, the market share of the subject imports has declined.

e. The average inventories of the domestic industry have declined over the period.

f. The profits, cash profits and return on capital employed earned by the domestic industry have declined.

g. The ability of the domestic industry to raise capital investment has not been impacted.

h. The volume of imports has declined over the injury period, and the imports were negligible during the period of investigation.

i. The volume of exports has historically declined upon imposition of duties but has increased once the duties are removed or allowed to expire.

j. The volume of imports has increased in the post-POI period by 500% when seen on an annualized basis.

k. The exporters in the subject country have a tendency to dump the subject goods, which is evident from the significant dumping margins determined in the present and past investigations.

l. India is a highly price attractive market for exporters in the subject country as the price of ***% exports from China to third counties is at prices below the prices prevailing in India and such imports can be diverted to the Indian market in absence of duties.

m. Korea RP has imposed anti-dumping duties on exports of the subject goods from the subject country, which shows that the exporters are engaging in unfair trade practices in third countries as well.

n. The exporters in China PR have significant capacities, which, if diverted to India, would be able to completely take over the market share of the Indian industry.

o. In light of the propensity of the Chinese producers (with significant capacities) to resort to dumping, there is a clear likelihood that Chinese producers will divert those capacities to India and there will be recurrence and continuation of dumping and injury to the DI as per Rule 23(1B) of the Rules.

p. While the domestic industry is currently earning profits, it would suffer significant financial losses, cash losses and negative profit before interest & return on capital employed in case it is forced to match the likely prices of exports from China in absence of duties.

81. In view of the above, it is concluded that the domestic industry has not suffered continued injury from imports. However, it is concluded, based on information on record, that there is likelihood of continuation or recurrence of dumping and consequent material injury to the domestic industry in case the present duties are allowed to expire.

F.3.6 Non-Attribution Analysis

82. 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 price of imports from third countries

83. It is noted that apart from imports from the subject country, there are no imports any other country in the POI. Therefore, the likely injury to the domestic industry cannot be attributed to imports from third countries.

b. Contraction in demand

84. It is seen that the demand for the subject goods has increased over the injury period. Thus, the domestic industry is not likely to suffer injury due to any possible contraction in demand.

c. Conditions of competition and trade restrictive practices

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

d. Pattern of consumption

86. 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.

e. Development of technology

87. There has been no material change in technology which could have caused injury to the domestic industry. Therefore, the likely injury cannot be attributed to technological developments.

f. Export performance

88. 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 of the likely injury.

g. Performance of other products of the company

89. 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.

G. INDIAN INDUSTRY'S INTEREST AND OTHER ISSUES

G.1 Submissions by the other interested parties

90. No submissions/comments were received from any other interested party in this regard.

G.2 Submissions by the domestic industry

91. The domestic industry has made the following submissions with regard to the Indian industry's interest.
    a. Continuation of anti-dumping duty is in the interests of the Indian industry, consumers and public at large.
    b. In past investigations, the Authority noted that imposition of duty would not affect availability of the products in the market and would only ensure fair competition in the market.
    c. Imposition of duties established fair market conditions and resulted in improvement in the performance parameters of the domestic industry. Moreover, due to favourable conditions in the market, a new domestic producer commenced operations.
    d. The duties did not hamper the operations or performance of the downstream users since the demand for subject goods increased despite imposition of duty.

e. The presence of anti-dumping duty did not have any adverse effect on the performance of the user industry since no user participated in the investigation despite the knowledge regarding the ongoing sunset review.
f. Sodium Hydrosulphite is not a raw material for any user, and is merely used as chemical additive. Accordingly, it does not account for major cost for such users.
g. Continuation of duties would have negligible impact on the costs of the end users, and such impact is less than 1% in most cases.
h. Even after negligible imports during the period of investigation, there was no complaint by the users regarding unavailability of subject goods in the Indian market.
i. There is no supply demand gap in the country, and the Indian capacity is sufficient to cater to Indian demand.
j. There are 5 producers of subject goods in India engaged in healthy competition. Thus, the users will have uninterrupted supply of subject goods.
k. The users can source the subject goods from 5 Indian producers or import the subject goods from the subject country at fair prices.
l. Existence of a healthy domestic industry is in the interests of the users. Absence of duty is likely to cause material injury to the domestic industry making the users completely dependent upon imports.
m. The domestic industry has participated in various CSR projects including promoting social causes including education, healthcare, environment, animal welfare, youth and women empowerment, rural community development and other initiatives, due to the sufficient profits earned post-imposition of duties.
n. The presence of anti-dumping duty is in line with the Make in India initiative of the Government of India and expiry of duties would defeat its objective.

G.3 Examination by the Authority

92. The Authority notes that the purpose of anti-dumping duty is to address injury caused to the domestic industry by dumped imports and to restore fair competition in the Indian market. Anti-dumping duty is not intended to restrict imports or protect the domestic industry from fair-priced imports. Its objective is to ensure a level playing field between imported and domestically produced goods. The Authority recognises that continuation of the anti-dumping duty may have some impact on the price of the subject goods in India. However, such continuation would not prevent imports or reduce fair competition. On the contrary, it would help ensure that imports compete on fair terms and that the domestic industry is not adversely affected by unfairly low-priced imports. In this context, the Hon’ble Supreme Court in Reliance Industries Ltd. v. Designated Authority & Ors. [(2006) 10 SCC 368] observed that while dumping may provide short-term benefits to consumers in the form of lower prices, it may, in the long run, adversely affect the domestic industry and competition in the market.

93. 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. However, none of the producers / exporters participated or submitted any information before the Authority. Further, while one importer/user registered itself as an interested party, it also did not furnish a response to the Economic Interest Questionnaire or submitted any other information.

94. The domestic industry has claimed that Sodium Hydrosulphite is not an input or raw material for any user, and is merely used as a chemical additive in various applications. As such, continuation of duties would not have any significant impact on the ultimate users. The domestic industry has submitted detailed calculations in support of its claims.

95. It is noted that Sodium Hydrosulphite is used in diverse industrial sectors. Major applications of the subject product in different segments are listed below:

a. Textiles – For dyeing of vat and indigo dyes and reduction clearing of synthetic fabric for stripping of dyes.

b. Bleaching aid – Used in ground wood pulp, soap, sugar, molasses, glue kaolin (clay).

c. Reducing agent – For reduction of metal ions to metals, disulphide linkage in wool hair and in nitrogen compounds.

d. Pharmaceuticals – For chemical reactions and de-colouring of final product.

e. Polymers – As an oxygen scavenging agent

96. It is noted that Sodium Hydrosulphite is used only as a chemical additive by the consumers. The product is not used as a raw material or major input by any user and thus, does not account of a measurable proportion in the cost for the users. Considering the utilization of the product under consideration in major applications as per the SION Norms, continuation of duties at current rates (USD 440 per MT) would have negligible impact on the downstream users as can be seen from the table below.

Particulars	Unit	Cotton fabric	Denim fabric	Sugar	Remarks
Price of product	Rs/kg or piece	442	250	50	A
SHS consumed (as per SION)	Kg/kg or piece	0.02	0.02	0.004	B
Landed price of SHS	Rs/kg	91.4	91.4	91.4	C
Cost of SHS in end-product	Rs/kg	1.8	1.8	0.4	D = B*C
ADD imposed	Rs/kg	38	38	38	E
Total cost of SHS after ADD	Rs/kg	2.6	2.6	0.5	H = (E*B)+D
Impact on end-product	Rs/kg or piece	0.76	0.76	0.15	I = H - D
Impact on end-product	%	0.17%	0.31%	0.31%	J - I/A

Particulars	Unit	Ceflacor	Cotrimoxazole	Remarks
Price of product	Rs/kg or piece	11,800	1.2	A
SHS consumed (as per SION)	Kg/kg or piece	3.43	0.0000408	B
Landed price of SHS	Rs/kg	91.4	91.4	C
Cost of SHS in end-product	Rs/kg	313.5	0.0037	D = B*C
ADD imposed	Rs/kg	38	38	E
Total cost of SHS after ADD	Rs/kg	444.4	0.005	H = (E*B)+D
Impact on end-product	Rs/kg or piece	130.94	0.0016	I = H - D
Impact on end-product	%	1.11%	0.13%	J - I/A

97. The Authority notes that the Indian industry has sufficient capacity to meet the present and foreseeable demand for the subject goods, with several domestic producers providing adequate choice to users. No user filed a questionnaire/Economic Interest Questionnaire response or placed evidence on record showing adverse impact of the existing duty. Accordingly, continuation of the duties is not expected to materially affect the availability of the subject goods or adversely impact downstream users. At the same time, the existing duties have helped maintain fair market conditions and enabled the Indian industry to improve its performance in the absence of unfairly priced imports.

H. POST-DISCLOSURE COMMENTS

98. 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 9th September 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 has already been adequately examined by the Authority has not been repeated for the sake of brevity.

H.1. Submissions by the other interested parties

99. The other interested parties have made the following new submissions post issuance of the disclosure statement:
   a. Details of raw materials used, production process involved, cost and usage regarding differences between the zinc process and sodium formate process should be provided. Additionally, differences in Sodium Hydrosulphite of different purities should also be provided.
   b. While it has been noted that the there is no demand supply gap in the country and the Indian industry has sufficient capacity to meet the demand, the factual basis for concluding the same has not been disclosed.
   c. The effect of anti-dumping duties imposed earlier must be examined.
   d. Details of exports, shutdowns and depreciation costs of the domestic industry must be called for and examined.
   e. Since the product is used in sugarcane/ sugar industry which is located only in North India and is produced seasonally, the effect of such regional and seasonal demand must be examined.
   f. The impact of imports from South Korea, Germany, Hong Kong and other countries must be examined.
   g. Cost and effect of pollution arising from manufacturing the subject goods must be examined.

H.2. Submissions by the domestic industry

100. The domestic industry has made the following new submissions post issuance of the disclosure statement:
    a. The conclusions proposed to be drawn with regards to product under consideration, domestic industry, dumping, likelihood of recurrence of dumping and injury, and causal link must be confirmed in the final findings.
    b. During the period of investigation, the Chinese exporters were exporting the goods to 69 countries, with 100% of the goods being exported at dumped prices. Further, 98% of all exports from China to third countries were at injurious prices.
    c. In case of cessation of duty, the domestic producers will not be able to compete with the prices of subject imports. In case the domestic industry is forced to reduce its prices, it would result in severe decline in profitability parameters and would cause material injury to the domestic industry.
    d. The Authority has, in previous investigations and in the present case, already noted that there are no significant differences between the product produced using zinc route or sodium formate route, as well as product having different purities.
    e. During the period of investigation, the total capacities available with the Indian industry was sufficient to meet the entire demand in the country, and there is no demand-supply gap for the product.
    f. The anti-dumping duties have addressed injury suffered by the domestic industry and has allowed it to sell its products while remaining profitable. However, in event of cessation of duties, there is likelihood of recurrence of injury.
    g. The details of exports by the domestic industry and depreciations costs have already been provided as part of Proforma IVA.
    h. The domestic industry did not face any abnormal or major shutdowns which would impact the operations of the domestic industry.
    i. The product is used in various applications and the usage is not limited to any season or region, which could have any impact on the demand for the product.
    j. Since there are no imports from any other country, the same could not have had any impact on the domestic industry.
    k. The domestic industry has not faced any abnormal costs on account of pollution caused during the manufacturing process.

H.3. Examination by the Authority

101. 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 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, which are considered relevant by the Authority, and which have not been already examined above, are examined below.

102. The submissions with regard to difference in manufacturing process, impact of imposition of anti-dumping duty on performance of domestic industry, exports by domestic industry, depreciation cost of the domestic industry, and impact of imports from other countries have already been examined in the relevant portion of the present final findings.

103. With regard to the contention that demand for the subject goods is seasonal and region-specific because of its use in the sugar industry, the Authority notes that Sodium Hydrosulphite is used in several industries and applications across the country and is not confined to the sugar industry. No evidence has been placed on record to show that seasonality or regional consumption has materially affected the demand for the subject goods. Further, the injury period covers four years and demand has increased over this period. The interested parties have also not demonstrated how any seasonal or regional factor has affected only a particular period. The contention is therefore not supported by the facts on record.

104. With regard to shutdowns of the domestic industry, the Authority has examined the information submitted by the domestic industry. It is seen that there were no abnormal or unplanned shutdowns which could have materially affected its performance during the relevant period.

105. The interested parties have sought disclosure of the basis for the finding that the Indian industry has sufficient capacity to meet domestic demand. The Authority has examined the capacity information submitted by the domestic industry and the supporting Indian producers. The position is as follows:

Name of producer	Status	Capacity (MT)
Silox India Private Limited	Domestic industry	***
Demosha Chemicals Private Limited	Supporter	***
Kutch Chemicals Private Limited	Supporter	***
Gulshan Chemicals Limited	Supporter	***
TCP Limited	Other Indian producer	***
Total Indian capacity		***
Total Indian demand		***

106. The total Indian capacity of ***MT is substantially higher than the Indian demand of ***MT. Thus, the Indian industry has sufficient capacity to meet the current domestic demand and also has capacity available to meet an increase in demand. Therefore, continuation of the anti-dumping duty is not expected to result in any shortage of the subject goods in India.

107. With regard to the contention concerning pollution-related costs, the Authority notes that the domestic industry has provided details of the expenditure incurred on effluent

treatment. No other abnormal or additional pollution-related cost has been identified. Further, the interested parties have not submitted any evidence showing that production of the subject goods involves unusually high pollution-related costs which have affected the performance of the domestic industry. The contention is therefore not supported by evidence on record. Therefore, the Authority does not find any merit in the submission.

108. The domestic industry has also placed information on record regarding exports of the subject goods from China PR to third countries. The Authority has examined the data submitted by the domestic industry with reference to the normal value and non-injurious price determined in the present investigation. The analysis shows that out of total Chinese exports of ***MT to third countries, ***MT, or about ***%, were exported at dumped prices. Further, ***MT, or about ***%, were exported at prices below the non-injurious price of the domestic industry after appropriate adjustments.

Particulars	Unit	POI
Volume of exports from China to third countries	MT	***
Volume of dumped exports from China to third countries	MT	***
Share of dumped exports in relation to total exports	%	**99%**
Volume of injurious exports from China to third countries	MT	***
Share of injurious exports in relation to total exports	%	**98%**
Demand in India	MT	***
Dumped exports to third countries in relation to Indian demand	%	***
Injurious exports to third countries in relation to Indian demand	%	***

109. The volume of Chinese exports to third countries at dumped and injurious prices is therefore significantly higher than the entire Indian demand. This shows that a substantial volume of Chinese exports is available at prices capable of causing injury. If the existing anti-dumping duty is allowed to expire, such exports could be redirected to the Indian market. The Authority therefore considers this to be an important factor supporting the likelihood of recurrence of dumped and injurious imports.

I. CONCLUSION

110. After examining the submissions made by the interested parties and issues raised therein; and considering the facts available on record, the Authority concludes that:

i. The product under consideration is Sodium Hydrosulphite, whether produced through the Zinc process or the Sodium Formate process.

ii. The product produced by the domestic industry is a like article to the imported product under consideration.

iii. The application for the sunset review was filed by Silox India Private Limited and was supported by Demosha Chemicals Private Limited, Gulshan Chemicals Limited and Kutch Chemicals Industries Limited.

iv. The applicant accounts for about ***% of the total Indian production and therefore constitutes the domestic industry. The applicant together with the supporting producers accounts for about ***% of the total Indian production.
v. The dumping margin determined for imports from the subject country is positive, above the de minimis level and significant.
vi. Demand for the subject goods increased overall over the injury period.
vii. The domestic industry has not suffered material injury during the present period. Subject imports declined to negligible levels, while domestic sales, production and capacity utilisation improved. Although profit, cash profit and return on capital employed declined, the domestic industry remained profitable.
viii. However, the available information shows that dumping and injury are likely to recur if the existing anti-dumping duty is allowed to expire, for the following reasons:
    a. Subject imports declined significantly during the injury period and were negligible during the POI.
    b. Historically, imports declined when anti-dumping duty was in force and increased when the duty was removed or allowed to expire.
    c. Imports increased during the post-POI period and, on an annualised basis, were higher than the POI and 2024-25.
    d. Significant dumping margins have been found in the present as well as earlier investigations, showing a continued tendency of Chinese exporters to dump the subject goods.
    e. Chinese exporters are exporting significant quantities to third countries at prices below the normal value and below the non-injurious price of the domestic industry. Such exports can be diverted to India if the duty expires.
    f. India is a price-attractive market. About 95% of Chinese exports to third countries are at prices below the prices prevailing in India, creating a strong possibility of diversion to India.
    g. Korea RP has also imposed anti-dumping duty on imports of the subject goods from China PR, indicating dumping of the subject goods in other markets as well.
    h. Chinese producers have significant production capacities. Even a part of these capacities, if diverted to India, can significantly affect the Indian market.
    i. Although the domestic industry is presently profitable, it is likely to suffer financial losses, cash losses and negative returns if it is required to reduce its prices to compete with likely Chinese import prices in the absence of duty.
ix. Continuation of the anti-dumping duty is in the public interest and is not expected to cause any significant adverse impact on the public at large.
x. The subject goods are used mainly as a chemical additive in downstream applications and do not constitute a major part of the cost of the downstream products.
xi. The continuation of duty is expected to have only a negligible impact on the price of downstream products and is therefore not likely to place any significant burden on end consumers.
xii. There are five producers of the subject goods in India and the available domestic capacity is sufficient to meet the present demand as well as a reasonable increase in future demand. Therefore, continuation of duty is not expected to create any demand-supply gap.

xiii. No user filed a questionnaire/Economic Interest Questionnaire response or placed evidence on record showing adverse impact of the existing duty. There is, therefore, no evidence on record showing any significant adverse impact of the existing duty on downstream users.

J. RECOMMENDATIONS

111. 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 and other interested parties to provide positive information on the aspect of continuation / recurrence of dumping and injury in the event of cessation of duties. Having concluded that there is likelihood of recurrence of dumping and injury to the domestic industry if the anti-dumping duties are allowed to cease, the Authority is of the view that continued imposition of measures is necessary on imports of the product under consideration from the subject country. The Authority considers it appropriate to recommend continuation of definitive antidumping duty imposed vide Notification No. 71/2021-Customs (ADD) dated 17 December 2021, pursuant to Final Findings dated 14 September 2021.

112. Considering the facts and circumstances of the case, as established hereinabove, anti-dumping duty equal to the amount indicated in Column (7) of the duty table given below is recommended to be imposed from the date of notification to be issued in this regard by the Central Government, on all imports of the product under consideration, from the subject country for a further period of five (5) 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.	2831 1010 and 2832 1020	Sodium Hydrosulphite	China PR	Any country including China PR	Any	440	MT	USD
2.	-do-	-do-	Any country other than China PR	China PR	Any	440	MT	USD

K. FURTHER PROCEDURE

113. 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

Digitally signed by
Amitabh Kumar
Date: 15-09-2026
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