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F. No. 7/30/2026-DGTR
Government of India
Ministry of Commerce & Industry
Department of Commerce
(Directorate General of Trade Remedies)
4th Floor, Jeevan Tara Building, 5, Parliament Street, New Delhi – 110 001

Dated: 30th September 2026

INITIATION NOTIFICATION

SETU ID - AD/MTR/006/2026

Subject: Initiation of mid-term review investigation of the anti-dumping duties imposed on imports of “Sodium Cyanide” originating in or exported from China PR and the European Union.

1. **F. No. 7/30/2026-DGTR** Superform Chemistries 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 a mid-term review investigation of the anti-dumping duties imposed vide Customs Notification No. 10/2024-Customs (ADD) dated 27th June 2024 on imports of “Sodium Cyanide” (hereinafter referred to as the “subject goods” or the “product under consideration”), originating in or exported from China PR and the European Union (hereinafter referred to as the “subject countries”), for modification of the quantum of the duties on account of changed circumstances.
2. In terms of Section 9A (5) of the Act read with Rule 23 of the Rules, the Authority is required to review, from time to time, the need for the continued imposition of anti-dumping duty. Article 11.2 of the WTO Agreement on Implementation of Article VI of the GATT 1994 provides that the authorities shall review the need for the continued imposition of the duty, where warranted, on their own initiative or, provided that a reasonable period of time has elapsed since the imposition of the definitive anti-dumping duty, upon request by any interested party which submits positive information substantiating the need for a review.
- A. Background**
3. The Authority initiated an anti-dumping investigation concerning imports of the subject goods originating in or exported from China PR, the European Union, Japan and Korea RP vide Notification No. 6/03/2023-DGTR dated 31st March 2023. The period of investigation in the said investigation was 1st October 2021 to 30th September 2022. The Authority, vide final findings Notification No. 6/03/2023-DGTR dated 28th March 2024, recommended the imposition of anti-dumping duties on imports of the subject goods from the said countries.

4. The Central Government, vide Notification No. 10/2024-Customs (ADD) dated 27th June 2024, imposed anti-dumping duties on imports of the subject goods for a period of five years, as under. The duties are in force up to 26th June 2029, unless revoked, superseded or amended earlier.

B. Product under consideration

5. The product under consideration in the present review is the same as defined in the original investigation, which reads as under:

"The product under consideration in the present investigation is sodium cyanide which is a moderately strong base. It is a poisonous compound with the formula NaCN. It is white in colour and is a water-soluble solid. The product under consideration is used for extraction of gold and silver from their respective ores, in electroplating, heat treatment of metals (case hardening), manufacturing insecticides, dyes, pigments, bulk drugs and in many organic syntheses, agrochemicals, nylon intermediates, relating compounds, ore flotation and pharmaceutical intermediates."

6. The present investigation being a mid-term review, the scope of the product under consideration remains the same as that in the original investigation. No product control numbers (PCNs) were adopted in the original investigation, and the applicant has not proposed any PCN methodology.
7. The product under consideration is classified under heading 2837 of Chapter 28 of the First Schedule to the Customs Tariff Act, 1975, principally under tariff item 2837 11 00. The product has also been reported to be imported under other tariff items of heading 2837. The customs classification is indicative only and is not binding on the scope of the product under consideration.
8. Interested parties may file comments on the scope of the product under consideration, if any, within 15 days from the date of this notification.

C. Like article

9. The applicant has claimed that there is no known difference between the subject goods exported from the subject countries and the subject goods produced by the domestic industry, which are comparable in terms of physical and chemical characteristics, manufacturing process, functions and uses, product specifications, distribution and marketing, and tariff classification, and are technically and commercially substitutable. The Authority, in the original investigation, had held the goods produced by the domestic industry to be like articles to the subject goods. Therefore, for the purpose of the present review, the subject goods produced by the applicant are being treated as like articles to the subject goods imported from the subject countries.

D. Domestic industry and standing

10. The application has been filed by Superform Chemistries, a wholly owned subsidiary of UPL Limited. The applicant has submitted that, with effect from 12th May 2025, the

specialty chemicals business of UPL Limited, including the business of manufacture of sodium cyanide, has been transferred to the applicant. UPL Limited was one of the constituents of the domestic industry in the original investigation.

11. Apart from the applicant, Hindusthan Engineering & Industries Limited (Division – Hindusthan Chemical Company) is the other producer of the subject goods in India. The applicant accounts for more than 70% of the total domestic production of the like article in India in the period of investigation. The applicant has certified that it has not imported the subject goods from the subject countries and is not related to any exporter or producer of the subject goods in the subject countries or to any importer of the subject goods in India.
12. On the basis of the information on record, the Authority notes that the applicant accounts for a major proportion of the total domestic production of the like article in India. Accordingly, the applicant constitutes the domestic industry within the meaning of Rule 2(b) of the Rules, and the application satisfies the requirements of Rule 5(3) read with Rule 23 of the Rules.

E. Subject countries and scope of the review

13. The subject countries in the present review are China PR and the European Union. The anti-dumping duties imposed on imports from Japan and Korea RP are not within the scope of the present review.
14. The present review covers all producers and exporters of the subject goods from the subject countries (China and European Union), including the producers subject to individual duties in the original investigation. The anti-dumping duties presently in force shall continue to remain in force during the pendency of the present review.

F. Changed circumstances alleged by the applicant

15. The applicant has alleged that the circumstances prevailing at the time of the original investigation have changed significantly, warranting a modification of the quantum of the anti-dumping duties, on the following grounds:
 - a. The import prices of the subject goods from the subject countries have declined significantly after the imposition of the anti-dumping duties, without a corresponding decline in the cost of raw materials and utilities.
 - b. The producers in China PR have undertaken significant capacity additions, and the exports of the subject goods from China PR have increased while their export prices have declined.
 - c. The export price of the subject goods from China PR to India has declined, whereas the export price to other countries has increased, as compared with the period of investigation of the original investigation.
 - d. The domestic industry is suffering financial losses, cash losses and negative return on capital employed.
 - e. The dumping margin and injury margin have increased significantly as compared with the original investigation.

G. Basis of alleged dumping

Normal value for China PR and European Union

16. The applicant has claimed that China PR should be treated as a non-market economy country in terms of paragraph 7 of Annexure I to the Rules, as was done in the original investigation. The Chinese producers are required to demonstrate that market economy conditions prevail in the industry producing the subject goods in terms of paragraph 8 of Annexure I to the Rules, in case they claim such treatment. For the purpose of initiation, the normal value for China PR has been constructed on the basis of the cost of production of the like article in India, including selling, general and administrative expenses, and a reasonable profit margin, in terms of paragraph 7 of Annexure I to the Rules.
17. For the purpose of initiation, the normal value for the European Union has been determined on the basis of the cost of production of the applicant.

Export price

18. The export price of the subject goods from the subject countries has been determined on the basis of the transaction-wise import data of the Directorate General of Systems and Data Management (DG Systems), duly adjusted for ocean freight, marine insurance, commission, bank charges, port expenses and handling charges to arrive at the ex-factory export price.

Dumping margin

19. The normal value and the export price have been compared at the ex-factory level, which *prima facie* shows that the dumping margin is above the *de minimis* level.

H. Injury and causal link

20. The information furnished by the applicant *prima facie* shows that the imports of the subject goods from the subject countries have increased after the imposition of the anti-dumping duties-in absolute terms as well as in relation to production and consumption in India. The import prices from the subject countries have declined significantly without a corresponding decline in the cost of raw materials and utilities of the domestic industry, resulting in price undercutting. The selling price of the domestic industry has declined over the injury period and has remained below its cost of sales. The domestic industry continues to suffer financial losses and a negative return on capital employed, despite the anti-dumping duties in force.
21. The applicant has further claimed that the injury margins for the subject countries have increased significantly as compared with the original investigation, and that the existing duties are not adequate to remove the injury to the domestic industry.

I. Initiation of the mid-term review investigation

22. Having examined the duly substantiated application filed by the applicant, and having satisfied itself, on the basis of the *prima facie* evidence furnished, that there is sufficient justification for a review of the quantum of the anti-dumping duties in force on account of changed circumstances of a lasting nature, the Authority, in terms of Section 9A(5) of the Act read with Rule 23 of the Rules, hereby initiates a mid-term review investigation to

examine the dumping margin and the injury margin afresh in respect of imports of the subject goods originating in or exported from China PR and the European Union, and to recommend the modification, if any, of the anti-dumping duties presently in force.

J. Period of investigation

23. The period of investigation (POI) for the present review is from 1st April 2025 to 31st March 2026 (12 months). The injury investigation period shall cover the periods from April 2022 to March 2023, April 2023 to March 2024, April 2024 to March 2025 and the POI.

K. Submission of information

24. All interested parties are required to register themselves on the SETU portal (<https://setu.dgtr.gov.in>). All communications and submissions from the interested parties shall be uploaded on the SETU portal under their registered name and the corresponding case ID – AD/MTR/006/2026. It should be ensured that the narrative part of the submission is in searchable PDF/MS Word format, and data files are in MS Excel format.
25. The known producers/exporters in the subject countries, the Governments of the subject countries through their Embassy/Delegation in India, the importers and users in India known to be concerned with the subject goods and the domestic industry are being informed separately to enable them to file all relevant information in the form and manner prescribed within the time limit set out below. All such information must be filed in the form and manner prescribed by this initiation notification, the Rules and the applicable trade notices issued by the Authority.
26. Any other interested party may also make its submissions relevant to the investigation in the form and manner prescribed by this initiation notification, the Rules and the applicable trade notices issued by the Authority within the time limit set out below.
27. Any party making any confidential submission before the Authority is required to make a non-confidential version of the same available to the other parties.
28. The interested parties are further advised to keep a regular watch on the official website of the Directorate General of Trade Remedies at www.dgtr.gov.in and the SETU portal for any updated information with respect to this investigation.

L. Time limit

29. Any communications and submissions from the interested parties shall be uploaded on the SETU portal under their registered name and the corresponding case ID – AD/MTR/006/2026. The confidential and non-confidential versions of each submission must be uploaded in the respective designated columns within 37 days from the date on which the non-confidential version of the application filed by the applicant would be circulated by the Authority or transmitted to the appropriate diplomatic representative of the exporting countries, as per Rule 6(4) of the Rules. If no information is received within the stipulated time limit, or the information received is incomplete, the Authority may record its findings on the basis of the facts available on record and in accordance with the Rules.

30. All the interested parties are hereby advised to intimate their interest (including the nature of interest) in the instant matter and file their questionnaire responses within the above time limit through the SETU portal only.
31. The 15-day period to file comments on the scope of the product under consideration shall run concurrently with the time limit mentioned above.
32. Any request for an extension of time must be submitted by the concerned parties through the SETU portal at least one day before the original deadline specified above. Requests submitted after this time will not be considered. Requests for extension beyond the time limit will ordinarily not be considered except in exceptional circumstances, in line with Rule 7(4) of the Rules.

M. Submission of information on confidential basis

33. Where any party to the present investigation makes confidential submissions or provides information on a confidential basis before the Authority, it is required to simultaneously submit a non-confidential version of such information in terms of Rule 7(2) of the Rules and the relevant trade notices issued by the Authority.
34. The submissions must be clearly marked as “confidential” or “non-confidential” at the top of each page. Any submission made to the Authority without such marking shall be treated as non-confidential, and the Authority shall be at liberty to allow the other interested parties to inspect such submission.
35. The confidential version shall contain all information which is by nature confidential and/or other information which the supplier of such information claims as confidential. For such information, the supplier is required to provide a good cause statement along with the supplied information as to why such information cannot be disclosed.
36. The non-confidential version is required to be a replica of the confidential version, with the confidential information preferably indexed or blanked out (in case indexation is not feasible) and summarised depending upon the information on which confidentiality is claimed. The non-confidential summary must be in sufficient detail to permit a reasonable understanding of the substance of the information furnished on a confidential basis. In exceptional circumstances, the party may indicate that such information is not susceptible to summary, and a statement of reasons why summarisation is not possible must be provided to the satisfaction of the Authority.
37. The interested parties can offer their comments on the confidentiality claimed in the submissions within seven days from the date of circulation of the non-confidential version of the documents.
38. The Authority may accept or reject the request for confidentiality on examination of the nature of the information submitted. If the Authority is satisfied that the request for confidentiality is not warranted, or if the supplier of the information is either unwilling to make the information public or to authorise its disclosure in generalised or summary form,

it may disregard such information. Any submission made without a meaningful non-confidential version or without a good cause statement on the confidentiality claim shall not be taken on record by the Authority.

39. The Authority, on being satisfied and accepting the need for confidentiality of the information provided, shall not disclose it to any party without the specific authorisation of the party providing such information.

N. Inspection of public file

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

O. Non-cooperation

41. 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 any other subsequent time period provided through a separate communication, or significantly impedes the investigation, the Authority may record its findings on the basis of the facts available to it and make such recommendations to the Central Government as it deems fit.

**Digitally signed by
Amitabh Kumar
Date: 30-09-2026
13:20:47**

**(Amitabh Kumar)
Designated Authority**