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**F. No. 6/32/2026-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 – 110001**

Dated 30th September, 2026

INITIATION NOTIFICATION

Case No. CVD/OI/004/2026

Subject: Initiation of anti-subsidy investigation concerning imports of Uncoated Writing and Printing Paper originating in or exported from Indonesia.

F. No. 6/32/2026-DGTR: Indian Paper Manufacturers Association (hereinafter also referred to as the “applicant” or “IPMA”), has filed an application on behalf of the domestic industry before the Designated Authority, in accordance with the Customs Tariff Act, 1975, as amended from time to time (hereinafter also referred to as the “Act”) and the Customs Tariff (Identification, Assessment and Collection of Countervailing Duty on Subsidised Articles and determination of injury) Rules, 1995, as amended from time to time, (hereinafter also referred to as the “Rules” or “Anti-Subsidy Rules”), alleging subsidisation of Uncoated paper made of virgin wood pulp of a kind used for writing, printing, graphic purposes, non-perforated punch card and punch tape paper in sheets, rolls, reels or any other forms having GSM of upto and including 150 (hereinafter also referred to as the “subject goods” or the “product under consideration”), originating in or exported from Indonesia (hereinafter also referred to as the “subject country”).

1. The applicant has alleged that the producers/exporters of the subject goods in the subject country have benefited from the actionable subsidies provided at various levels by the Government of the subject country, including the Governments of different provinces and municipalities in which producers/exporters are located, and other ‘Public Bodies’. The applicant has relied upon the relevant Laws, Rules and Regulations, and other Notifications of the relevant Government Agencies and Public Bodies, as available in the public domain, and on the determinations of various investigating authorities which have conducted investigations of such schemes and concluded the existence of countervailable subsidy programs. The applicant has further alleged that material injury is being caused to the domestic industry due to the imports of alleged subsidized product under consideration originating in or exported from the subject country. Accordingly, the applicant has requested for the imposition of anti-subsidy duty on imports of the subject goods originating in or exported from the subject country.

A. PRODUCT UNDER CONSIDERATION

2. The product under consideration in the present investigation is Uncoated paper made of virgin wood pulp of a kind used for writing, printing, graphic purposes, non-perforated punch card and punch tape paper in sheets, rolls, reels or any other forms having GSM of upto and including 150. Such papers (or paperboards) are suitable for communicating information, creating documents, and high quality-image reproduction due to its rougher, more porous, and absorbent texture compared to coated paper. The scope of product under consideration in the present investigation is limited to uncoated writing and printing paper made purely from virgin wood pulp.
3. The scope of product under consideration includes, inter alia, any product imported as maplitho, wood-free paper, printing paper, writing paper, drawing paper, lithographic paper, offset paper, duplicating paper, account book paper, envelope paper, notebook paper, calendar paper, etc.
4. The scope of product under consideration specifically excludes the following:
 - a. Uncoated Paper or Paperboard with GSM above 150
 - b. Cut-size copier paper
 - c. Currency note paper
 - d. Airmail paper
 - e. Photographic base paper, uncoated
 - f. Bank and cheque paper
 - g. Stamp paper
 - h. Automatic data processing machine paper
 - i. Tissue paper
 - j. Wrapping paper
 - k. Decor paper
 - l. Filter paper
 - m. Fluting paper
 - n. Wallpaper (for application on walls)
 - o. Poster Paper
 - p. Kraft Paper
 - q. Uncoated writing and printing paper made from recycled pulp or agro-waste
 - r. Fine paper of a kind used for other than writing and printing application
 - s. Newsprint
5. The paper or paperboard may be suitable for different applications, depending on the GSM of the product. However, the most common applications of product under consideration include writing paper, printing paper, stationery and office, publications and for marketing or packaging.

6. The subject goods are classified under Chapter 48, heading 4802 Schedule I to the Customs Tariff Act. The subject goods are majorly imported under HS codes 4802 20 90, 4802 54 20, 4802 55 10, 4802 55 90, 4802 56 90, 4802 57 10, 4802 57 90, 4802 61 10, and 4802 61 90. The Customs classification is only indicative and is not binding on the scope of the product under consideration.
7. The domestic industry has not proposed any PCN at the present stage. The interested parties in the present investigation may provide their comments on the product under consideration and the proposed PCNs, if any, within 15 days from the date of transmission of the intimation letters, containing, inter alia, the non-confidential version of the application and the respective questionnaire(s), to the known interested parties and the diplomatic representative(s) of the subject country/countries.

B. LIKE ARTICLE

8. There is no known difference between the subject goods produced by the domestic industry and the product under consideration imported from the subject country. The subject goods produced by the domestic industry are comparable to the product under consideration imported from the subject country in all terms including characteristics such as physical & chemical characteristics, manufacturing process & technology, functions & uses, pricing, distribution & marketing and tariff classification. The two are technically and commercially substitutable. Therefore, for the purpose of the present investigation, the subject goods produced by the domestic industry are being treated as “like article” to the subject goods imported from the subject country.

C. DOMESTIC INDUSTRY AND STANDING

9. The application has been filed by IPMA. The following members of the applicant association (hereinafter also referred to as the “applicant domestic producers”) have provided their data for the purpose of the present investigation.
 - a. Bilt Graphic Paper Products Limited
 - b. West Coast Paper Mills Limited
10. Further, following domestic producers have supported the present application:
 - a. Andhra Paper Limited
 - b. Century Pulp and Paper
 - c. JK Paper Limited
 - d. Orient Paper & Industries Limited
 - e. Star Paper Mills Limited
11. Apart from the applicant domestic producers and supporters there are three other domestic producers of the subject goods in India, namely, ITC Limited, Pudumjee Paper Products Limited and Satia Industries Limited.

12. The applicant domestic producers are not related to exporters of the subject goods in the subject country or importers of the product under consideration in India. Further, none of the applicant domestic producers has imported the product under consideration into India during the period of investigation.
13. In view of the above and after examination of the application, the Authority considers that the applicant domestic producers account for a major proportion of the Indian production during the period of investigation and constitute domestic industry within the meaning of Rule 2(b) of the rules and the application satisfies the requirements of the Rule 6(3) of the Anti-Subsidy Rules.

D. SUBJECT COUNTRY

14. The present application has been filed with respect to subsidized imports of subject goods originating in or exported from the Republic of Indonesia.

E. PERIOD OF INVESTIGATION

15. The period of investigation in the present investigation is 1st April 2025 to 31st March 2026. The injury investigation period shall cover period 1st April 2022 to 31st March 2023, 1st April 2023 to 31st March 2024, 1st April 2024 to 31st March 2025 and the period of investigation.

F. BASIS OF ALLEGED SUBSIDISATION

16. The applicant has alleged that the Government of Indonesia maintains various countervailable subsidy programs. The domestic industry has submitted that there is sufficient evidence showing that the exporters of the subject goods have received subsidies in the form of provision of goods and services at less than adequate remuneration, tax and VAT incentives, incentives in Special Economic Zones, export incentives and preferential loans, which confer a benefit and are not generally available to all companies in Indonesia. The information provided by the applicant show sufficient *prima facie* evidence that the below mentioned programs constitute actionable subsidies as per the Agreement on Subsidies and Countervailing Measures and the Anti-Subsidy Rules, 1995.
17. The applicant has alleged that the following subsidy programs are maintained by the Government of Indonesia and that the producers and exporters of the subject goods in the subject country may have benefitted from them:

I. Programs in the Form of Provision of Goods and Services at less than Adequate Remuneration

1. Program No. 1 – Provision of standing timber for less than adequate remuneration

2. Program No. 2 – Government prohibition on exports of logs
3. Program No. 3 – Provision of Land at less than Adequate Remuneration
4. Program No. 4 – Provision of Electricity at less than Adequate Remuneration

II. Programs in the Form of Tax and VAT Incentives

5. Program No. 5 – Reduction of Income Tax
6. Program No. 6 – Exemption of Import Duty
7. Program No. 7 – Exemption of Import Duty on raw materials
8. Program No. 8 – Exemption of VAT
9. Program No. 9 – Accelerated depreciation or amortization
10. Program No. 10 – Relief from Land and Building Tax
11. Program No. 11 – Tax Holiday
12. Program No. 12 – Deduction in corporate income tax
13. Program No. 13 – Reduction on Income Tax on Dividend

III. Provision of Incentives in Special Economic Zones

14. Program No. 14 – Reduced tax for entities in Special Economic Zones
15. Program No. 15 – Postponement of import duty on capital goods and equipment
16. Program No. 16 – Reduction of Net Taxable Income
17. Program No. 17 – Acceleration of fiscal depreciation and amortisation deductions
18. Program No. 18 – Carry forward of losses
19. Program No. 19 – Deduction in Land Tax

IV. Programs in the form of Export Incentives

20. Program No. 20 – Benefits for export facilitation by Indonesia EXIM Bank
21. Program No. 21 – Export credit Guarantees
22. Program No. 22 – Import Duty Drawback

V. Program in the form of Preferential Loans

23. Program No. 23 – Preferential loans provided by Bank Mandiri

18. In addition to the above programs, the Designated Authority will investigate any other subsidies, which may be found to exist or were availed by the producers and exporters of the subject goods, during the injury period.

G. CONSULTATION

19. In terms of Article 13 of the Agreement on Subsidies and Countervailing Measures (ASCM), pre-initiation consultations were held on 22nd September 2026 with the representatives of the Government of Indonesia. The Government of Indonesia has also

furnished its written comments. The comments received have been taken on record and have been considered by the Authority, and the same will be duly taken into consideration during the course of the investigation.

H. INJURY AND CAUSAL LINK

20. Information furnished by the applicant has been considered for assessment of injury to the domestic industry. The domestic industry has furnished prima facie evidence regarding material injury caused by the alleged subsidised imports from the subject country. On the basis of the transaction-wise import data obtained from the Directorate General of Systems and Data Management, subject imports have increased in the period of investigation in absolute terms as well as in relation to production and consumption in India, and account for about two-thirds of the total imports of the subject goods into India. The landed price of subject imports has declined over the injury period, has remained below the selling price of the domestic industry in each year of the injury period and has fallen below the cost of sales of the domestic industry in the period of investigation. The decline in the landed price of subject imports has suppressed and depressed the prices of the domestic industry, which has been unable to recover the increase in its cost of sales. As a result, the domestic industry has incurred financial losses in the period of investigation, its return on capital employed has declined steeply and its inventories have increased. Thus, the evidence provided by the applicant, prima facie shows injury to the domestic industry caused by alleged subsidised imports from the subject country.

I. INITIATION OF THE INVESTIGATION

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

J. PROCEDURE

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

K. SUBMISSION OF INFORMATION

23. All the interested parties are required to register themselves on SETU Portal (<https://setu.dgtr.gov.in>). All communications and submissions from the interested parties

shall be uploaded on the SETU portal under their registered name and corresponding case ID CVD/OI/004/2026. 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.

24. The known producers/ exporters in the subject country, the Government of the subject country through its Embassy in India, the importers and users in India which are known to be associated with the subject goods are being informed separately to enable them to file all the relevant information in the form and manner prescribed within the time limits set out below. All such information must be filed in the form and manner prescribed by this initiation notification, the Anti-Subsidy Rules, and the applicable trade notices issued by the Authority.
25. Any other interested party may also make submissions relevant to the present investigation in the form and manner prescribed within the time limits set out in this initiation notification, the Rules and the applicable trade notices issued by the Authority. Any party making any confidential submission before the Authority is required to make a non- confidential version of the same available to the other parties.
26. Interested parties are further directed to regularly visit the official website of the Directorate General of Trade Remedies (<https://www.dgtr.gov.in/>) and SETU portal (<https://setu.dgtr.gov.in>) for any updated information with respect to this investigation. Interested parties are directed to regularly visit the website of DGTR (<https://www.dgtr.gov.in/>) to stay apprised with the further developments in the subject investigation and remain informed regarding notices that may be issued from time to time regarding questionnaire formats, PCN methodology, PCN discussion/meeting schedule, notice of oral hearing, corrigendum, amendment notifications, and other such information.

L. TIME LIMIT

27. Any information relating to the present investigation should be uploaded on the SETU portal (<https://setu.dgtr.gov.in>) under their registered name and corresponding case ID. Both versions of each submission, the confidential version (CV) and the non-confidential version (NCV) must be uploaded in the respective designated columns within 37 days from the date of transmission of the intimation letters, containing, inter alia, the non-confidential version of the application and the respective questionnaire(s), to the known interested parties and the diplomatic representative(s) of the subject country/countries 7(4) of the Rules. If no information is received within the stipulated time limit or the information received is incomplete, the Authority may record its findings based on the facts available on record and in accordance with the Rules.
28. All the interested parties are hereby advised to intimate their interest (including the nature of interest) in the instant matter and file their questionnaire responses within the time limit as stipulated in this notification through SETU portal only.

29. The 15-day period to file comments on the scope of the PUC/ PCN Methodology shall run concurrently with the time limit mentioned in paragraph 27 above of this Initiation Notification.
30. Extension due to Modification of PUC/PCN: An extension of time by 15 days shall be granted if the Authority, through a subsequent notice, modifies the PUC and PCN that was not previously proposed or is different from the initiation notification. This extension of 15 days shall be granted from date of such notification of modified PUC and PCN. Extension of time by 15 days stated in this paragraph is not applicable in instances where there is no change in the PUC and PCN methodology after initiation of investigation. Requests for a further extension of time, beyond the 15-day extension (if granted), will ordinarily not be considered except in case of exceptional circumstances, in line with the Rule 7(4) of the Rules.
31. Any request for an extension must be submitted by the concerned parties through the SETU portal at least one day before the original deadline specified in this notification. Requests submitted after this time will not be considered.

M. SUBMISSION OF INFORMATION ON NON-CONFIDENTIAL BASIS

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

36. The confidential version shall contain all information which is by nature confidential and/or other information which the supplier of such information claims as confidential. For information which is claimed to be confidential by nature or the information on which confidentiality is claimed because of other reasons, the supplier of the information is required to provide a good cause statement along with the supplied information as to why such information cannot be disclosed.
37. The non-confidential version of the information filed by the interested parties is required to be a replica of the confidential version with the confidential information, preferably indexed or blanked out (in case indexation is not feasible) and summarised depending upon the information on which confidentiality is claimed.
38. The non-confidential summary must be in sufficient detail to permit a reasonable understanding of the substance of the information furnished on confidential basis. However, in exceptional circumstances, the party submitting the confidential information may indicate that such information is not susceptible to summary, and a statement of reasons containing a sufficient and adequate explanation in terms of Rule 8 of the Anti-Subsidy Rules and appropriate trade notices issued by the Authority, as to why such summarization is not possible, must be provided to the satisfaction of the Authority.
39. The interested parties can offer their comments on the issue of confidentiality claimed by the other interested parties within 7 days from the date of circulation of the non-confidential version of the documents.
40. 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.
41. Any submission made without a meaningful non-confidential version thereof or without good cause statement in terms of Rule 8 of the Anti-Subsidy Rules and appropriate trade notices issued by the Authority on the confidentiality claim shall not be taken on record by the Authority.
42. The Authority on being satisfied and accepting the need for confidentiality of the information provided, shall not disclose it to any party without specific authorisation of the party providing such information.

N. INSPECTION OF PUBLIC FILE

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

O. NON-COOPERATION

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

**Digitally signed by
Amitabh Kumar**

Date: 30-09-2026

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(Amitabh Kumar)

Designated Authority