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Committee on Safeguards

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**NOTIFICATION UNDER ARTICLE 12.1(B) OF THE AGREEMENT ON  
SAFEGUARDS ON FINDING A SERIOUS INJURY OR THREAT  
THEREOF CAUSED BY INCREASED IMPORTS**

**NOTIFICATION OF A PROPOSAL TO IMPOSE A MEASURE**

INDONESIA

*Articles of Apparel and Clothing Accessories*

The following communication, dated and received on 22 February 2021, is being circulated at the request of the delegation of Indonesia.

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Pursuant to Articles 12.1(b) of the Agreement on Safeguards, the Government of the Republic of Indonesia submits a notification on finding serious injury or threat thereof, to the domestic industries producing "Articles of Apparel and Clothing Accessories" and a notification of proposed safeguard measures. This notification contains all pertinent information relating to the proposed safeguard measures in accordance with Article 12.2 of the Agreement on Safeguards and an offer of consultations pursuant to Article 12.3 of the Agreement on Safeguards.

**A. GENERAL BACKGROUND**

**1. INITIATION OF INVESTIGATION**

On 9 September 2020, an application for a safeguard measures was received by the Investigating Authority from the Indonesian Textile Association/*Asosiasi Pertekstilan Indonesia* (API) hereinafter referred as "the Applicant", against the importation of the product under investigation. After examining the properly documented application, the Investigating Authority concluded that there was a sufficient evidence to justify the initiation of a safeguard investigation.

Subsequently, on 1 October 2020, the Investigating Authority initiated a safeguard investigation on the import of "Articles of Apparel and Clothing Accessories". The commencement of the investigation was announced in the *Bisnis Indonesia* newspaper on 1 October 2020 and the Ministry of Trade's website on 1 October 2020. The said initiation was also notified in the WTO document G/SG/N/6/IDN/36, circulated on 2 October 2020.

**2. PERIOD OF INVESTIGATION**

The period of investigation covers 2017 to 2019.

**3. MAJOR PROPORTION**

The total production of the Applicant is 54.86% of the total domestic production of the Subject Goods. Therefore, it represents a major proportion as required by Article 4.1(c) of the WTO Agreement on Safeguards.

#### 4. VIEWS AND COMMENTS OF THE INTERESTED PARTIES

In accordance with Article 3.1 of the WTO Agreement on Safeguards, during the process of investigation, the Investigating Authority has provided opportunities to all interested parties, to submit their views, evidences, comments, and responses concerning the investigation. In light of the aforementioned, the Investigating Authority has held public hearings on 20 November 2020. (The said public hearing was also notified in the WTO document G/SG/N/6/IDN/36/Suppl.1, circulated on 3 November 2020).

#### B. INFORMATION ON WHETHER THERE IS AN ABSOLUTE INCREASE IN IMPORTS OR AN INCREASE IN IMPORTS RELATIVE TO DOMESTIC PRODUCTION

In the light to provide evidence whether there is an absolute increase in imports or an increase in imports relative to domestic production, the Investigating Authority has analysed import data of the Subject Goods during the period of investigation.

##### 1. ABSOLUTE INCREASE IN IMPORTS

**Table 1. Volume of Imports**

Description	Unit	Year		
		2017	2018	2019
Volume of Imports	Ton	44,095	48,522	52,546
Growth	%		10.04	8.29
Trend	%		9.16	

Source: Statistics Indonesia/*Badan Pusat Statistik* (BPS).

The volume of imports increased each year from 44,095 ton in 2017 to 48,522 ton in 2018 or by 10.04% and increased again to 52,546 ton or by 8.29% in 2019. During the period of 2017-2019 imports increased in absolute terms with a trend of 9.16%.

The absolute increased imports of each product categories are listed in Annex I.

##### 2. RELATIVE INCREASE IN IMPORTS TO TOTAL DOMESTIC PRODUCTION

**Table 2. Volume of Imports, Total Domestic Production, and Relative to Total Domestic Production**

Description	Unit	Year		
		2017	2018	2019
Volume of Imports	Ton	44,095	48,522	52,546
Total Domestic Production	Index	100	92.41	87.46
Imports Relative to the Domestic Production	Index	100	119.07	136.25
Growth	%		19.07	14.43
Trend	%		16.73	

Source: Statistics Indonesia and as verified by Investigating Authority.

As seen in Table above, there was a surge increased in imports relative to the national production during the investigation period, from 100 indexed points in 2017 to 119.07 indexed points in 2018, and continued to increase to 136.25 indexed points in 2019. During 2017-2019, imports relative to the national production was increased with trend of 16.73%.

The relative increases in imports to domestic production of each product categories are listed in Annex I.

### 3. IMPORTS FROM MAIN COUNTRIES

**Table 3. Import Shares**

Country	2019	
	Volume (Ton)	Share of imports (%)
People's Republic of China (PRC)	39,203	74.61
Bangladesh	3,122	5.94
Viet Nam	1,802	3.43
Singapore	1,636	3.11
Developing Countries under 3%	6,123	11.65
Other Countries	661	1.26
<b>World</b>	<b>52,546</b>	<b>100</b>

Source: Statistics Indonesia/Badan Pusat Statistik (BPS).

From the table above, the biggest shares of import in 2019 was PRC, which its shares of import in 2019 accounted for 74.61%. Other countries with share of imports above 3% during 2019 are Bangladesh (5.94%), Viet Nam (3.43%), and Singapore (3.11%). Developing countries members with less than 3% imports share collectively above 9% of total imports of the product concerned for 11.65%.

Imports shares of each product categories are listed in Annex II.

### 4. UNFORESEEN DEVELOPMENT

The increased imports of the Subject Goods from the exporting countries were unforeseeable. This is caused the trade war between PRC and the United States (US), which made a significant impact on the rapid supply of imported goods from PRC for textile and apparel and clothing accessories. US imposed an additional 15% tariff for Textile and Apparel. The additional tariffs imposed by the US for apparel products from PRC have created a gap. PRC is diverting exports of its clothing products to other countries, including Indonesia, which has a large market potential. This situation poses a big threat to domestic apparel and clothing accessories manufacturers in domestic market.

In the other hand, increased production and investment of the apparel and clothing accessories in Viet Nam from 2017 to 2018 had a significant impact on the increase imports volume of the apparel and clothing accessories in Indonesia from Viet Nam.

Moreover, the export incentives of the Government of Bangladesh and India for the apparel and clothing accessories also had significant impact on the increase imports volume of the apparel and clothing accessories in Indonesia from Bangladesh and India.

### C. EVIDENCE OF SERIOUS INJURY OR THREAT THEREOF CAUSED BY INCREASED IMPORTS

In a view to determine the existence of serious injury or threat of serious injury that is caused by increased imports, the Investigating Authority has analyzed and made an evaluation of all relevant factors in an objective and quantifiable natures. The following analyses are based on data provided by the Applicant, which has been verified by the Investigating Authority.

#### 1. EVIDENCE OF SERIOUS INJURY OR THREAT OF SERIOUS INJURY

The general economic indicators related to Subject Goods in the safeguard investigation are presented at the table below, whereas the indicators related to the products for each category are given in the Annex III.

**Table 4. National Consumption, Volume of Imports, and Market Shares**

No.	Description	Unit	Year			Trend (17-19)
			2017	2018	2019	
1.	National Consumption	Index	100	99.75	99.21	(0.39)
2.	Volume of Imports	Ton	44,095	48,522	52,546	9.16
3.	Applicant's Domestic Sales	Index	100	92.64	86.45	(7.02)
4.	Non-Applicant's Domestic Sales	Index	100	96.83	92.32	(3.91)
5.	Import's market share	Index	100	110.32	120.11	9.60
6.	Applicant's market share	Index	100	92.88	87.14	(6.65)
7.	Non-Applicant's market share	Index	100	97.07	93.06	(3.53)

Source: Statistics Indonesia and as verified by the Investigating Authority.

Based on the table above, it can be concluded that during the investigation period the surge in market share of imports has taken the domestic market share of both the Applicant and the Non-Applicant.

From 2017 to 2019 national consumption has decreased with a trend of 0.39%. On the contrary, volume of imports increased with a trend of 9.16% in the same period. The increase in the imports of the Subject Goods resulted in a decline in the market share of the Applicant and Non-Applicant with a trend of 6.65% and 3.53%, respectively. Meanwhile, in the same period the market share of imports increased with a trend of 9.60%.

**Table 5. The Applicant's Indicators of Injury**

No.	Description	Unit	Year			Trend (17-19)
			2017	2018	2019	
1.	Production	Index	100	92.10	87.85	(6.27)
2.	Domestic Sales	Index	100	92.64	86.45	(7.02)
3.	Productivity	Index	100	97.23	97.08	(1.47)
4.	Utilization Capacity	Index	100	94.38	85.82	(7.36)
5.	Profit	Index	100	84.23	57.55	(24.14)
6.	Employment	Index	100	94.72	90.50	(4.87)
7.	Inventory	Index	100	149.51	204.90	43.14

Source: As verified by the Investigating Authority.

As shown in Table 5, the performance of the applicant can be seen as follows:

- a) Production experienced a decrease with a trend of 6.27% during 2017-2019, from 100 indexed points in 2017 to 92.10 indexed points in 2018 and decreased again to 87.85 indexed points in 2019.
- b) Domestic Sales decreased with a trend of 7.02% during 2017-2019, from 100 indexed points in 2017 to 92.64 indexed points in 2018 and then decreased again to 86.45 indexed points in 2019.
- c) The applicant's productivity has decreased with a trend of 1.47% during 2017-2019. Productivity in 2017 was 100 indexed points, declined to 97.23 indexed points in 2018 and 97.08 indexed points in 2019.
- d) Utilization Capacity experienced a decrease during 2017-2019 with a trend of 7.36% from 100 indexed points in 2017 to 94.38 indexed points in 2018 and 85.82 indexed points in 2019.
- e) Applicant's profit experienced a significant decrease during 2017-2019 with a trend of 24.14% from 100 indexed points in 2017 to 84.23 indexed points in 2018 and 57.55 indexed points in 2019.
- f) The Applicant's Employment decreased during 2017-2019 with trend of 4.87% from 100 indexed points in 2017 to 94.72 indexed points in 2018 and 90.50 indexed points in 2019.

- g) The Applicant's Inventory increased during 2017-2019 with a trend of 43.14% from 100 indexed points in 2017 to 149.51 indexed points in 2018 and 204.90 indexed points in 2019.
- h) Based on the explanation above, it can be concluded that during the investigation period, the Applicant experienced threat of serious injury based on the Applicant's performance that indicated a downward trend in production, domestic sales, productivity, utilization capacity, profit, employment and increased of inventories.

The Applicant's performance indicators related to all products concerned in the safeguard investigation are presented at the table above, whereas the indicators related to each category are given in the Annex III.

## 2. OTHER FACTORS THAT MAY CONTRIBUTE TO INJURY

In order to ensure that the serious injury or threat of serious injury is only caused by increased imports, the Investigating Authority has examined the following other known factors:

a. Technology

Based on the results of the investigation, the Applicant already has the latest technology in producing the Subject Goods. This argument is supported by the fact that the Applicant's machinery is able to produce sophisticated goods for the consumers. This shows that the threat of a serious injury suffered by the Applicant is not caused by technology.

b. Quality

The quality of goods produced by the Applicant has met the international standards such as LRQA ISO 9001:2015 and OEKO-TEX certificate. Thus, in terms of quality, goods produced by the Applicant are able to compete with imported goods because they already met the internationally recognized standards.

c. Competition between domestic producers

**Table 6. Competition between Domestic Producers**

Description	Unit	Year			Trend 2017-2019
		2017	2018	2019	
Imports' Market Share	Index	100	110.32	120.11	9.60
Applicant's Market Share	Index	100	92.88	87.14	(6.65)
Non-Applicant's Market Share	Index	100	97.07	93.06	(3.53)

Source: Statistics Indonesia and as verified by the Investigating Authority.

As shown in Table above, during period of 2017 to 2019 the Applicant's market share decreased from 100 indexed points in 2017 to 92.88 indexed points in 2018 and 87.14 indexed points in 2019. In line with the Applicant's market share, the Non-Applicant's market share also decreased from 100 indexed points in 2017 to 97.07 indexed points in 2018 and 93.06 indexed points in 2019. As oppose, during the same period the import market share increased significantly from 100 indexed points in 2017 to 110.32 indexed points in 2018 and 120.11 indexed points in 2019. This proves that the competition between the Applicant and Non-Applicant is not a factor that causes a threat of serious injury to the Applicant.

Based on the facts of 2.a. to c. above, it can be concluded that during the period of investigation there were no other factors that caused a threat of serious injury to the Applicant other than increased volume of imports of the Subject Goods.

## 3. CAUSAL LINK

The Investigating Authority has examined all relevant factors having a bearing in the Applicant situation, and came into a conclusion that threat of serious injury suffered by the Applicant mainly caused by significant increased volume of imports and not due to the other factors, as follows:

- a) There was a surge increase of Subject Goods in absolute terms in 2017-2019 with a trend of 9.16%.
- b) There was a surge increase of Subject Goods in relative to domestic production in 2017-2019 with a trend of 16.73%.
- c) Import's market share has increased with a trend of 9.60% in 2017-2019.
- d) The Applicant's market share has decreased with a trend of 6.65% and the Non-Applicant's market share has also decreased with a trend of 3.53% during 2017-2019.
- e) Downward trend in production, domestic sales, productivity, utilization capacity, employment, profit, and increased of inventories.
- f) There were no other factors that caused a threat of serious injury to the Applicant other than increased volume of imports of the Subject Goods.

#### D. DESCRIPTION OF THE PROPOSED SUBJECT GOODS

Articles of Apparel and Clothing Accessories, Excluding apparels made from Celliant Fabric Technology, under Harmonized System (HS.) codes ex.6101.20.00, ex.6101.30.00, ex.6101.90.00, ex.6102.20.00, ex.6102.30.00, ex.6102.90.00, 6103.10.00, 6103.22.00, 6103.23.00, 6103.29.00, 6103.32.00, 6103.33.00, 6103.39.90, ex.6103.42.00, ex.6103.43.00, ex.6103.49.00, 6104.13.00, 6104.19.20, 6104.19.90, 6104.22.00, 6104.23.00, 6104.29.00, 6104.32.00, 6104.33.00, 6104.39.00, 6104.43.00, 6104.44.00, 6104.49.00, 6104.52.00, 6104.53.00, 6104.59.00, ex.6104.62.00, ex.6104.63.00, ex.6104.69.00, 6105.10.00, 6105.20.10, 6105.20.20, 6105.90.00, 6106.10.00, 6106.20.00, 6106.90.00, ex.6109.10.10, ex.6109.10.20, ex.6109.90.20, ex.6109.90.30, ex.6110.20.00, ex.6110.30.00, 6110.90.00, 6111.20.00, 6111.30.00, 6111.90.90, 6117.10.10, 6117.10.90, 6201.12.00, 6201.13.00, 6201.19.20, 6201.19.90, ex.6201.92.00, ex.6201.93.00, 6201.99.20, 6201.99.90, 6202.12.00, 6202.13.00, 6202.19.20, 6202.19.90, ex.6202.92.00, ex.6202.93.00, 6202.99.20, ex.6202.99.90, 6203.12.00, 6203.19.11, 6203.19.19, 6203.19.90, 6203.22.10, 6203.22.90, 6203.23.00, 6203.29.90, 6203.32.10, 6203.32.90, 6203.33.00, 6203.39.00, ex.6203.42.10, ex.6203.42.90, ex.6203.43.00, ex.6203.49.90, 6204.12.10, 6204.12.90, 6204.13.00, 6204.19.90, 6204.22.10, 6204.22.90, 6204.23.00, 6204.29.90, 6204.32.10, 6204.32.90, 6204.33.00, 6204.39.90, 6204.42.10, 6204.42.90, 6204.43.00, 6204.44.00, 6204.49.10, 6204.49.90, 6204.52.10, 6204.52.90, 6204.53.00, 6204.59.10, 6204.59.90, ex.6204.62.00, ex.6204.63.00, ex.6204.69.00, 6205.20.10, 6205.20.90, 6205.30.90, 6205.90.91, 6205.90.99, 6206.30.10, 6206.30.90, 6206.40.00, 6206.90.00, 6209.20.30, 6209.20.40, 6209.20.90, 6209.30.10, 6209.30.30, 6209.30.40, 6209.30.90, 6209.90.00, 6214.30.10, 6214.30.90, 6214.40.10, 6214.40.90, 6214.90.10, 6214.90.90.

The product categories and 134 8-digit HS that are subject to the proposed safeguard measures are listed in Annex IV.

#### E. DESCRIPTION OF THE PROPOSED MEASURE

In a view of the aforementioned findings, a safeguard measures has been proposed in form of specific duty with HS codes, proposed date of introduction, and expected duration of the measure as follow:

**Table 7. The Proposed on Safeguard Measures**

No	Products Categories	Specific Duty (Rupiah/Piece)		
		Period I	Period II	Period III
1.	Top Garments-Casual	45,499	42,305	39,335
2.	Top Garments-Formal	156,979	145,959	135,713
3.	Bottom Garments	90,346	84,004	78,107
4.	Suits, Ensembles and Dresses	159,143	147,971	137,584
5.	Outerwear	138,930	129,177	120,109
6.	Babies' garments and clothing accessories	32,034	29,785	27,694
7.	Headwear and Neckwear	6,231	5,794	5,387

In a view of the aforementioned conclusion of the causal link, the Investigating Authority has proposed to the Government of the Republic of Indonesia to impose a safeguard measures on the importation of the Subject Goods for three periods.

The imposition of the safeguard measures will be carried out in accordance with the Article 2.2 and Article 9 of the WTO Agreement on Safeguards.

According to article 9.1 of the WTO Agreement on Safeguards, developing country Members with less than 3% import share collectively account for not more than 9% of total imports in the Headwear and neckwear category of subject goods are excluded from the safeguard measures (Annex II).

The non-confidential version of the Final Report of this investigation, can be found in the website of the Indonesian Safeguard Committee: <http://kppi.kemendag.go.id>.

#### **PROVIDE PROPOSED DATE OF THE APPLICATION OF THE MEASURE**

The safeguard measures is proposed to enter into force after the publication of the decree of the Minister of Finance of the Republic of Indonesia, which will be promulgated at the Official Gazette.

#### **CONSULTATIONS**

Members who have a substantial interest of the Subject Goods, shall submit a written request of consultation within a period of 7 days from the date of circulation of this notification. All written requests must be sent both in written letter and in electronic format, and must indicate the name, address, email address, phone and fax number of the Members.

In Accordance with Article 12.3 WTO Agreement on Safeguard, the Government of the Republic of Indonesia is open for consultation in order to provide opportunities for those Members, consultation is scheduled to be held no later than 19 March 2021.

The contact information for correspondence is:

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## ANNEX-I

## INCREASED IMPORTS OF THE PRODUCT CATEGORIES

Products Categories	Imports	Unit	Year			Trend (%)
			2017	2018	2019	17-19
Top Garments-Casual	Absolute	Ton	4,621	5,985	6,323	16.98
	Relative to Domestic Production	Index	100	139.15	156.28	25.01
Top Garments-Formal	Absolute	Ton	9,203	7,824	9,730	2.83
	Relative to Domestic Production	Index	100	91.56	117.79	8.53
Bottom Garments	Absolute	Ton	11,094	9,879	11,979	3.91
	Relative to Domestic Production	Index	100	95.53	119.61	9.37
Suit, ensemble, dresses	Absolute	Ton	4,521	4,108	5,289	8.15
	Relative to Domestic Production	Index	100	102.29	146.40	21.00
Outerwear	Absolute	Ton	4,522	6,168	6,941	23.90
	Relative to Domestic Production	Index	100	144.01	174.25	32.00
Babies's garments and clothing accessories	Absolute	Ton	544	765	801	21.44
	Relative to Domestic Production	Index	100	160.89	194.84	39.58
Headwear and neckwear	Absolute	Ton	9,591	13,794	11,483	9.42
	Relative to Domestic Production	Index	100	158.64	144.23	20.09
<b>Total</b>	<b>Absolute</b>	<b>Ton</b>	<b>44,095</b>	<b>48,522</b>	<b>52,546</b>	<b>9.16</b>
	<b>Relative to Domestic Production</b>	<b>Index</b>	<b>100</b>	<b>119.07</b>	<b>136.25</b>	<b>16.73</b>

Source: Statistics Indonesia and as verified by the Investigating Authority.



**ANNEX-II****IMPORT SHARES OF THE PRODUCT CATEGORIES****1. Top Garments-Casual**

Country	2019	
	Volume (Ton)	Share of Imports (%)
People's Republic of China (PRC)	3,461	54.74
Bangladesh	1,235	19.53
Viet Nam	435	6.88
Turkey	224	3.54
India	205	3.25
Developing Countries under 3%	597	9.44
Other Countries	166	2.62
<b>World</b>	<b>6,323</b>	<b>100</b>

Source: Statistics Indonesia/Badan Pusat Statistik (BPS).

**2. Top Garments-Formal**

Country	2019	
	Volume (Ton)	Share of Imports (%)
People's Republic of China (PRC)	7,267	74.69
Singapore	517	5.31
Bangladesh	366	3.76
Malaysia	321	3.30
Developing Countries under 3%	1,127	11.59
Other Countries	132	1.36
<b>World</b>	<b>9,730</b>	<b>100</b>

Source: Statistics Indonesia/Badan Pusat Statistik (BPS).

**3. Bottom Garments**

Country	2019	
	Volume (Ton)	Share of imports (%)
People's Republic of China (PRC)	8,337	69.60
Bangladesh	853	7.12
Viet Nam	656	5.48
Cambodia	396	3.31
Turkey	370	3.09
Developing Countries under 3%	1,179	9.84
Other Countries	188	1.57
<b>World</b>	<b>11,979</b>	<b>100</b>

Source: Statistics Indonesia/Badan Pusat Statistik (BPS).

**4. Suits, Ensembles and Dresses**

Country	2019	
	Volume (Ton)	Share of Imports (%)
People's Republic of China (PRC)	4,622	87.39
Developing Countries under 3%	623	11.78
Other Countries	44	0.83
<b>World</b>	<b>5,289</b>	<b>100</b>

Source: Statistics Indonesia/Badan Pusat Statistik (BPS).

## 5. Outerwear

Country	2019	
	Volume (Ton)	Share of imports (%)
People's Republic of China (PRC)	4,302	61.98
Singapore	636	9.17
Bangladesh	440	6.35
Viet Nam	433	6.24
Turkey	213	3.06
Developing Countries under 3%	798	11.49
Other Countries	119	1.71
<b>World</b>	<b>6,941</b>	<b>100</b>

Source: Statistics Indonesia/Badan Pusat Statistik (BPS).

## 6. Babies' garments and clothing accessories

Country	2019	
	Volume (Ton)	Share of imports (%)
People's Republic of China (PRC)	349	43.52
Bangladesh	182	22.73
India	126	15.70
Turkey	33	4.09
Cambodia	24	3.00
Developing Countries under 3%	80	10.00
Other Countries	8	0.96
<b>World</b>	<b>801</b>	<b>100</b>

Source: Statistics Indonesia/Badan Pusat Statistik (BPS).

## 7. Headwear and Neckwear

Country	2019	
	Volume (Ton)	Share of Imports (%)
People's Republic of China (PRC)	10,865	94.62
Developing Countries under 3%	613	5.34
Other Countries	4	0.04
<b>World</b>	<b>11,483</b>	<b>100</b>

**ANNEX-III****GENERAL ECONOMIC INDICATORS AND APPLICANT'S INDICATORS  
OF INJURY OF THE PRODUCT CATEGORIES****1. Top Garments-Casual**

Indicators	Unit	Year			Trend (%) 17-19
		2017	2018	2019	
Market share of Imports	Index	100	125.78	136.44	16.81
Market Share of Applicant	Index	100	90.31	85.67	(7.44)
Market Share of Non-Applicant	Index	100	94.54	93.03	(3.55)
Production	Index	100	92.81	87.10	(6.67)
Domestic Sales	Index	100	92.99	85.91	(7.31)
Productivity	Index	100	99.09	96.19	(1.92)
Capacity Utilization	Index	100	94.57	91.38	(4.41)
Profit	Index	100	88.06	61.73	(21.43)
Employment	Index	100	93.67	90.55	(4.84)
Inventory	Index	100	150.73	202.60	42.34

Source: As verified by the Investigating Authority.

**2. Top Garments-Formal**

Indicators	Unit	Year			Trend (%) 17-19
		2017	2018	2019	
Market share of Imports	Index	100	91.90	108.76	4.29
Market Share of Applicant	Index	100	100.64	91.31	(4.44)
Market Share of Non-Applicant	Index	100	107.92	101.67	0.83
Production	Index	100	93.11	90.64	(4.79)
Domestic Sales	Index	100	93.11	88.76	(5.79)
Productivity	Index	100	99.93	101.87	0.93
Capacity Utilization	Index	100	93.43	91.66	(4.26)
Profit	Index	100	84.28	59.49	(22.87)
Employment	Index	100	93.17	88.98	(5.67)
Inventory	Index	100	152.22	210.15	44.96

**3. Bottom Garments**

Indicators	Unit	Year			Trend (%) 17-19
		2017	2018	2019	
Market share of Imports	Index	100	94.48	110.12	4.94
Market Share of Applicant	Index	100	100.02	93.09	(3.52)
Market Share of Non-Applicant	Index	100	105.13	99.20	(0.40)
Production	Index	100	92.69	91.76	(4.21)
Domestic Sales	Index	100	94.27	91.28	(4.46)
Productivity	Index	100	96.62	98.50	(0.75)
Capacity Utilization	Index	100	92.87	92.56	(3.79)
Profit	Index	100	83.57	57.80	(23.98)
Employment	Index	100	95.93	93.15	(3.48)
Inventory	Index	100	146.45	202.03	42.14

**4. Suits, Ensembles and Dresses**

Indicators	Unit	Year			Trend (%) 17-19
		2017	2018	2019	
Market share of Imports	Index	100	100.73	126.05	12.27
Market Share of Applicant	Index	100	98.73	84.26	(8.21)
Market Share of Non-Applicant	Index	100	100.67	88.92	(5.70)
Production	Index	100	87.60	78.92	(11.16)
Domestic Sales	Index	100	89.07	78.20	(11.57)
Productivity	Index	100	90.53	89.54	(5.37)
Capacity Utilization	Index	100	87.84	79.32	(10.94)
Profit	Index	100	84.89	55.54	(25.48)
Employment	Index	100	96.76	88.14	(6.12)
Inventory	Index	100	143.64	191.09	38.23

**5. Outerwear**

Indicators	Unit	Year			Trend (%) 17-19
		2017	2018	2019	
Market share of Imports	Index	100	123.48	136.62	16.88
Market Share of Applicant	Index	100	85.15	76.13	(12.75)
Market Share of Non-Applicant	Index	100	82.55	73.61	(14.20)
Production	Index	100	92.50	87.06	(6.69)
Domestic Sales	Index	100	94.05	85.52	(7.52)
Productivity	Index	100	95.69	93.35	(3.38)
Capacity Utilization	Index	100	92.85	87.92	(6.24)
Profit	Index	100	77.00	41.55	(35.54)
Employment	Index	100	96.67	93.26	(3.43)
Inventory	Index	100	140.75	196.58	40.21

**6. Babies' garments and clothing accessories**

Indicators	Unit	Year			Trend (%) 17-19
		2017	2018	2019	
Market share of Imports	Index	100	142.52	157.25	25.40
Market Share of Applicant	Index	100	83.34	77.44	(12.00)
Market Share of Non-Applicant	Index	100	97.36	96.64	(1.69)
Production	Index	100	84.83	73.96	(14.00)
Domestic Sales	Index	100	82.20	72.51	(14.85)
Productivity	Index	100	94.28	91.95	(4.11)
Capacity Utilization	Index	100	84.75	76.54	(12.52)
Profit	Index	100	83.04	23.52	(51.50)
Employment	Index	100	89.97	80.44	(10.31)
Inventory	Index	100	154.90	199.54	41.26

**7. Headwear and Neckwear**

Indicators	Unit	Year			Trend (%) 17-19
		2017	2018	2019	
Market share of Imports	Index	100	119.56	118.42	8.82
Market Share of Applicant	Index	100	75.49	77.57	(11.92)
Market Share of Non-Applicant	Index	100	77.29	77.89	(11.74)
Production	Index	100	92.82	82.77	(9.02)
Domestic Sales	Index	100	90.80	78.43	(11.44)
Productivity	Index	100	97.88	97.60	(1.21)
Capacity Utilization	Index	100	92.85	82.98	(8.91)
Profit	Index	100	81.96	66.71	(18.32)
Employment	Index	100	94.84	84.81	(7.91)
Inventory	Index	100	170.61	257.65	60.51

**ANNEX-IV****THE PROPOSED SUBJECT GOODS**

<b>No</b>	<b>Product Categories</b>	<b>HS Codes*</b>
1.	Top Garments-Casual	ex.6109.10.10, ex.6109.10.20, ex.6109.90.20, ex.6109.90.30
2.	Top Garments-Formal	6105.10.00, 6105.20.10, 6105.20.20, 6105.90.00, 6106.10.00, 6106.20.00, 6106.90.00, 6205.20.10, 6205.20.90, 6205.30.90, 6205.90.91, 6205.90.99, 6206.30.10, 6206.30.90, 6206.40.00, 6206.90.00
3.	Bottom Garments	ex.6103.42.00, ex.6103.43.00, ex.6103.49.00, 6104.52.00, 6104.53.00, 6104.59.00, ex.6104.62.00, ex.6104.63.00, ex.6104.69.00, ex.6203.42.10, ex.6203.42.90, ex.6203.43.00, ex.6203.49.90, 6204.52.10, 6204.52.90, 6204.53.00, 6204.59.10, 6204.59.90, ex.6204.62.00, ex.6204.63.00, ex.6204.69.00.
4.	Suits, Ensembles and Dresses	6103.10.00, 6103.22.00, 6103.23.00, 6103.29.00, 6104.13.00, 6104.19.20, 6104.19.90, 6104.22.00, 6104.23.00, 6104.29.00, 6104.43.00, 6104.44.00, 6104.49.00, 6203.12.00, 6203.19.11, 6203.19.19, 6203.19.90, 6203.22.10, 6203.22.90, 6203.23.00, 6203.29.90, 6204.12.10, 6204.12.90, 6204.13.00, 6204.19.90, 6204.22.10, 6204.22.90, 6204.23.00, 6204.29.90, 6204.42.10, 6204.42.90, 6204.43.00, 6204.44.00, 6204.49.10, 6204.49.90.
5.	Outerwear	ex.6101.20.00, ex.6101.30.00, ex.6101.90.00, ex.6102.20.00, ex.6102.30.00, ex.6102.90.00, 6103.32.00, 6103.33.00, 6103.39.90, 6104.32.00, 6104.33.00, 6104.39.00, ex.6110.20.00, ex.6110.30.00, 6110.90.00, 6201.12.00, 6201.13.00, 6201.19.20, 6201.19.90, ex.6201.92.00, ex.6201.93.00, 6201.99.20, 6201.99.90, 6202.12.00, 6202.13.00, 6202.19.20, 6202.19.90, ex.6202.92.00, ex.6202.93.00, 6202.99.20, ex.6202.99.90, 6203.32.10, 6203.32.90, 6203.33.00, 6203.39.00, 6204.32.10, 6204.32.90, 6204.33.00, 6204.39.90
6.	Babies' garments and clothing accessories	6111.20.00, 6111.30.00, 6111.90.90, 6209.20.30, 6209.20.40, 6209.20.90, 6209.30.10, 6209.30.30, 6209.30.40, 6209.30.90, 6209.90.00.
7.	Headwear and neckwear	6117.10.10, 6117.10.90, 6214.30.10, 6214.30.90, 6214.40.10, 6214.40.90, 6214.90.10, 6214.90.90.

\*HS Codes are based on Indonesian Customs Tariff Book (Buku Tarif Kepabeanan Indonesia/BTKI) 2017.