

駐印尼代表處經濟組 函

受文者：經濟部國際貿易署

發文日期：中華民國112年10月31日

發文字號：印尼經字第1120000563號

速別：最速件

密等及解密條件或保密期限：

附件：如文（印尼經1120000563_Attach1.pdf、印尼經1120000563_Attach2.pdf、印尼經1120000563_Attach3.pdf、印尼經1120000563_Attach4.pdf）

主旨：有關印尼頃對進口棉紗(Cotton Yarn)防衛措施案展開調查事，敬請轉知我相關業者及公協會。

說明：

- 一、依據印尼貿易部本(112)年10月27日新聞稿(如附件1)辦理。
- 二、前述新聞稿略以，印尼貿易部防衛措施委員會(KPPI)已收到業者要求對本案展開防衛措施調查，經檢視相關初步資訊，認為進口涉案產品對印尼本地產業存在嚴重損害或有嚴重損害之虞，爰決定於本年10月27日對本案展開調查，隨函檢送展開防衛措施調查公告依據之調查申請書(如附件2)，擬登記為利害關係人者，應於公告展開調查後15日內(即11月10日下班前)提出。
- 三、經初步檢視調查申請書，本案係由印尼紡織公會(API)代表15家廠商提出申請，涉案品項共27項。出口廠商名單未列入我國業者(均為中國業者)，2019至2022年我國未列主要



進口來源。

四、檢陳新聞稿及調查申請書英譯版如附件3、4，倘內容有差異，請以印尼文版本為主。

正本：經濟部國際貿易署

副本： 電子文件
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交換章

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SIARAN PERS

Biro Hubungan Masyarakat
Gd. I Lt. 2, Jl. M.I. Ridwan Rais No. 5, Jakarta 10110
Telp: 021-3860371/Fax: 021-3508711
www.kemendag.go.id



KPPI Mulai Penyelidikan Safeguards Tindakan Pengamanan Perdagangan Atas Lonjakan Impor Benang Kapas

Jakarta, 27 Oktober 2023 – Komite Pengamanan Perdagangan Indonesia (KPPI) memulai Penyelidikan Tindakan Pengamanan Perdagangan (*Safeguards Measures*) terhadap lonjakan jumlah impor barang berupa benang kapas pada hari ini, Jumat, (27/10). Komoditas yang dimaksud mencakup 27 nomor *Harmonized System* (HS) 8 digit yaitu 5204.11.10, 5204.19.00, 5204.20.00, 5205.11.00, 5205.12.00, 5205.21.00, 5205.22.00, 5205.24.00, 5205.26.00, 5205.32.00, 5205.41.00, 5205.42.00, 5205.43.00, 5205.47.00, 5205.48.00, 5206.11.00, 5206.12.00, 5206.14.00, 5206.21.00, 5206.23.00, 5206.24.00, 5206.25.00, 5206.31.00, 5206.32.00, 5206.33.00, 5206.42.00, dan 5206.45.00 berdasarkan Buku Tarif Kepabeanan Indonesia (BTK) tahun 2022.

Plt. Ketua KPPI Nugraheni Prasetya Hastuti mengungkapkan, penyelidikan tersebut didasarkan pada permohonan Asosiasi Pertekstilan Indonesia (API) yang mewakili industri penghasil benang di dalam negeri. KPPI menerima permohonan dari API tersebut pada 18 September 2023.

“Dari bukti awal permohonan yang diajukan oleh API, KPPI menemukan adanya lonjakan jumlah impor barang benang kapas. Selain itu, terdapat indikasi awal mengenai adanya kerugian serius atau ancaman kerugian serius yang dialami oleh industri dalam negeri. Indikator tersebut antara lain menurunnya volume produksi, penjualan domestik, kapasitas terpakai, keuntungan,; berkurangnya jumlah tenaga kerja; serta menurunnya pangsa pasar industri dalam negeri di pasar domestik,” jelas Nugraheni.

Berdasarkan data dari Badan Pusat Statistik (BPS) dalam empat tahun terakhir (2019—2022), terjadi peningkatan jumlah impor barang benang kapas dengan tren sebesar 29,79 persen. Pada 2019 jumlah impornya sebesar 14.843 ton. Pada 2020 sebesar 12.588 ton. Kemudian pada 2021 naik 65,82 persen menjadi 20.873 ton. Selanjutnya, pada 2022 naik 43,28 persen menjadi 29.908 ton.

Negara asal impor barang benang kapas yaitu dari Vietnam sebesar 45,65 persen, Republik Rakyat Tiongkok (27,80 persen), India (8,20 persen), Turki (7,36 persen), Pakistan (3,89 persen), Thailand (3,53 persen), dan negara lainnya sebesar (3,57 persen).

KPPI mengundang semua pihak yang berkepentingan untuk mendaftar sebagai Pihak Yang Berkepentingan selambat-lambatnya 15 hari sejak tanggal pengumuman ini dan disampaikan secara tertulis kepada:

Komite Pengamanan Perdagangan Indonesia

Kementerian Perdagangan Republik Indonesia

Jl. M.I Ridwan Rais No. 5, Gedung I, Lantai 5, Jakarta 10110

Telp/Fax: (021) 3857758

E-mail: kppi@kemendag.go.id

--selesai--

Informasi lebih lanjut hubungi:

M. Rivai Abbas

Plt. Kepala Biro Hubungan Masyarakat

Kementerian Perdagangan

Email: pusathumas@kemendag.go.id

Komite Pengamanan Perdagangan Indonesia

Email: kppi@kemendag.go.id

**BUKTI AWAL PERMOHONAN PENYELIDIKAN
DALAM RANGKA PENGENAAN TINDAKAN
PENGAMANAN PERDAGANGAN TERHADAP
LONJAKAN JUMLAH IMPOR BARANG BENANG
KAPAS YANG MASUK KE DALAM NOMOR HS:**

**5204.11.10, 5204.19.00, 5204.20.00, 5205.11.00,
5205.12.00, 5205.21.00, 5205.22.00, 5205.24.00,
5205.26.00, 5205.32.00, 5205.41.00, 5205.42.00,
5205.43.00, 5205.47.00, 5205.48.00, 5206.11.00,
5206.12.00, 5206.14.00, 5206.21.00, 5206.23.00,
5206.24.00, 5206.25.00, 5206.31.00, 5206.32.00,
5206.33.00, 5206.42.00, dan 5206.45.00**

TIDAK RAHASIA

**DISAMPAIKAN OLEH
ASOSIASI PERTEKSTILAN INDONESIA (API)
TAHUN 2023**

A. UMUM

Asosiasi Pertekstilan Indonesia (API) yang selanjutnya disebut Pemohon mewakili sebanyak 15 (lima belas) perusahaan Industri Benang Kapas, dengan ini mengajukan permohonan kepada Komite Pengamanan Perdagangan Indonesia (KPPI) untuk melakukan penyelidikan dalam rangka Tindakan Pengamanan Perdagangan (*Safeguards*) terhadap impor barang Benang Kapas yang mengakibatkan kerugian serius atau ancaman kerugian serius.

Permohonan kami didasari oleh terjadinya lonjakan volume impor barang Benang kapas dengan nomor pos tarif (*Harmonized System*): HS. 5204.11.10, 5204.19.00, 5204.20.00, 5205.11.00, 5205.12.00, 5205.21.00, 5205.22.00, 5205.24.00, 5205.26.00, 5205.32.00, 5205.41.00, 5205.42.00, 5205.43.00, 5205.47.00, 5205.48.00, 5206.11.00, 5206.12.00, 5206.14.00, 5206.21.00, 5206.23.00, 5206.24.00, 5206.25.00, 5206.31.00, 5206.32.00, 5206.33.00, 5206.42.00, dan 5206.45.00, sesuai dengan Buku Tarif kepabeanan Indonesia (BTKI) tahun 2022. Lonjakan volume barang impor tersebut telah memberikan dampak terhadap penurunan kinerja Pemohon selaku Industri Dalam Negeri (IDN) yang memproduksi barang sejenis atau yang secara langsung bersaing dengan barang impor.

Untuk mendukung permohonan yang diajukan, bersama ini kami sampaikan kelengkapan bukti awal permohonan dan didukung dengan dokumen-dokumen yang dipersyaratkan sesuai ketentuan Peraturan Pemerintah Nomor 34 Tahun 2011 (PP 34/2011) tentang Tindakan Anti-Dumping, Tindakan Imbalan dan Tindakan Pengamanan Perdagangan dan Keputusan Menteri Perindustrian dan Perdagangan Republik Indonesia Nomor 85 Tahun 2003 (Kepmenperindag 85/2003) tentang Tata Cara dan Persyaratan Permohonan Penyelidikan atas Pengamanan Industri Dalam Negeri dari Akibat Lonjakan Impor.

B. PEMOHON

Nama : Asosiasi Pertekstilan Indonesia (API)
Alamat : Graha Surveyor Indonesia Lt.16
Jl. Jend. Gatot Subroto Kav. 56, Jakarta Selatan
Telp/Faks : 021-5272171 / 021-5272166
E-mail : sekretariat@bpnapi.org

Ketua Umum : Jemmy Kartiwa Sastraatmadja

Contact Person : Andrew Purnama

Jabatan : Sekretaris Jenderal API

Daftar nama perusahaan yang diwakili Pemohon dalam penyelidikan ini adalah sebagai berikut:

Tabel 1. Daftar Produsen yang Diwakili Pemohon

| Nama Perusahaan | Alamat | Telepon & Email |
|---|---|--|
| 1. PT. Bitratex Industries | Jl. Taman Curie No.3, Pasir Kaliki, Kec. Cicendo, Kota Bandung, Jawa Barat 40171 | (022) 4266592 bitrasmg@bitratex.com |
| 2. PT. Delta Merlin Sandang Tekstil | Jl. Raya Timur, Kenatan, Bumiaji, Kec. Sragen, Kabupaten Sragen, Jawa Tengah 57254 (KM 10) | (0271) 887008 duniatex@gmail.com |
| 3. PT. Delta Dunia Sandang Tekstil | Jl. Raya Semarang-Demak Km.14,Tambakroto,Sayung, Batu Lor, Batu, Kec. Demak, Kabupaten Demak, Jawa Tengah 59563 | (024) 6514232 deltaduniasandang@gmail.com |
| 4. PT. Delta Dunia Tekstil | Jl. Maospati - Solo, Gerdu, Jetis, Kec. Jaten, Kabupaten Karanganyar, Jawa Tengah 57731 | (0271) 622878 personaliaddtpondok@gmail.com |
| 5. PT. Dunia Setia Sandang Asli Tekstil | Jl. H. Fachrudin No.36, RT.9/RW.5, Petamburan, Kecamatan Tanah Abang, Kota Jakarta Pusat, Daerah Khusus Ibukota Jakarta 10250 | (0271) 827623 penjualan@duniatex.com |
| 6. PT. Delta Merlin Dunia Tekstil | Pd. III, Pondok, Kec. Grogol, Kabupaten Sukoharjo, Jawa Tengah 57552, Indonesia | (0271) 653113 personaliadmdt5@gmail.com |
| 7. PT. DamaiteX | Jl. Simongan No.100, Ngemplak Simongan, Kec. Semarang Barat, Kota Semarang, Jawa Tengah 50148 | (024) 7605804 ptdamirex_smg@yahoo.co.id |
| 8. PT. Embee Plumbon | Jl. KH. Mas Mansyur Kav. 126, Jakarta Pusat 10220 | (021) 29529456 embee@embee.co.id |

| Nama Perusahaan | Alamat | Telepon & Email |
|---------------------------------------|---|---|
| 9. PT. Lotus Indah Textile Industries | Jl. Prof. Dr. Sutami No.111 B, Sukarasa, Kec. Sukasari, Kota Bandung, Jawa Barat 40153 | (022) 2004450 litingn@lotusindah.co.id |
| 10. PT. Gokak Indonesia | Jalan Ateng Ilyas No 1 RT 02/08, Kampung Muhara, Citeurep, Bogor 16810, West Java | (081)5107-44377 factory@gokakindonesia.com |
| 11. PT. Kewalram Indonesia | Jalan Raya Rancaekek KM 25, Kab. Sumedang | (+62-22) 7798346 info@kewalram.co.id |
| 12. PT. Primayudha Mandirijaya | Dusun 3, Ngadirojo, Kec. Ampel, Kabupaten Boyolali, Jawa Tengah 57352 | (021) 57903640 marketing@primayudha.com |
| 13. PT. Sariwarna Asli | Jl. Hos Cokroaminoto no. 28 Pucang Sawit, Surakarta, Jawa Tengah. Indonesia 57125 | +62 271 648747 publikasi.swag@gmail.com |
| 14. PT. Sinar Pantja Djaja | Jl. Condrokusumo Raya No.1, Bongsari, Kec. Semarang Barat, Kota Semarang, Jawa Tengah 50148 | (024) 7603888 spd_smg@sritex.co.id |
| 15. PT. Sri Rejeki Isman, Tbk. | Jl. KH. Samanhudi 88, Jetis, Sukoharjo, Solo – Central Java, Indonesia | (62-71) 593188 hrd@sritex.co.id |

Sumber: Pemohon, diolah

C. PROPORSI PRODUKSI PEMOHON

Tabel 2. Jumlah Produksi dan Proporsi Produksi Tahun 2022

| Uraian | Proporsi (%) |
|----------------------|---------------------|
| Produksi Pemohon | 67,60 |
| Produksi Non Pemohon | 32,40 |
| Produksi Nasional | 100 |

Sumber: IDN dan Pemohon, diolah

Total produksi Pemohon pada Tahun 2022 adalah 67,60% terhadap total produksi nasional. Berdasarkan data dalam tabel 2 di atas, hal ini telah sesuai dengan ketentuan Peraturan Pemerintah (PP) 34 tahun 2011 tentang tindakan Anti-Dumping, Tindakan Subsidi, dan Tindakan Pengamanan Perdagangan Bab I Pasal I ayat 18, dimana produksi Pemohon merupakan proporsi yang besar dari keseluruhan produksi benang kapas di Indonesia sehingga memenuhi syarat sebagai IDN dalam hal Tindakan Pengamanan.

D. BARANG YANG DIMINTAKAN PERLINDUNGAN

1. Uraian Barang Impor Terselidik

Berdasarkan BTKI tahun 2022, adapun nomor *Harmonized System* (HS) dan uraian Barang Yang Diselidiki adalah sebagai berikut:

Tabel 3. Uraian Lengkap Barang Impor Terselidik

| No | Nomor HS | Uraian Barang | Description of Goods |
|----|--------------|---|---|
| | 52.04 | Benang jahit dari kapas, disiapkan untuk penjualan eceran maupun tidak. | <i>Cotton sewing thread, whether or not put up for retail sale</i> |
| | | - Tidak disiapkan untuk penjualan eceran : | - <i>Not put up for retail sale</i> : |
| 1 | 5204.11 | -- Mengandung kapas 85 % atau lebih menurut beratnya : | <i>Containing 85 % or more by weight of cotton :</i> |
| 2 | 5204.11.10 | --- Tidak dikelantang | <i>Cotton sewing thread; not put up for retail sale; containing 85 % or more by weight of cotton; unbleached</i> |
| 3 | 5204.19.00 | -- Lain-lain | <i>cotton sewing thread; not put up for retail sale; containing less than 85 % by weight of cotton</i> |
| 4 | 5204.20.00 | - Disiapkan untuk penjualan eceran | <i>cotton sewing thread; put up for retail sale</i> |
| | 52.05 | Benang kapas (selain benang jahit), mengandung kapas 85 % atau lebih menurut beratnya, tidak disiapkan untuk penjualan eceran. | <i>Cotton yarn (other than sewing thread), containing 85 % or more by weight of cotton, not put up for retail sale.</i> |
| | | - Benang tunggal, dari serat tidak disisir: | <i>Single yarn, of uncombed fibres</i> |
| 5 | 5205.11.00 | -- Ukuran 714,29 desiteks atau lebih (tidak melebihi nomor metrik 14) | <i>single yarn, of uncombed fibres; measuring 714.29 decitex or more (not exceeding 14 metric number)</i> |
| 6 | 5205.12.00 | -- Ukuran kurang dari 714,29 desiteks tetapi tidak kurang dari 232,56 desiteks (melebihi nomor metrik 14 tetapi tidak melebihi nomor metrik 43) | <i>single yarn, of uncombed fibres; measuring less than 714.29 decitex but not less than 232.56 decitex (exceeding 14 metric number but not exceeding 43 metric number)</i> |

| No | Nomor HS | Uraian Barang | Description of Goods |
|----|------------|---|---|
| | | - Benang tunggal, dari serat disisir : | Single yarn, of combed fibres |
| 7 | 5205.21.00 | -- Ukuran 714,29 desiteks atau lebih (tidak melebihi nomor metrik 14) | <i>single yarn, of combed fibres; measuring 714.29 decitex or more (not exceeding 14 metric number)</i> |
| 8 | 5205.22.00 | -- Ukuran kurang dari 714,29 desiteks tetapi tidak kurang dari 232,56 desiteks (melebihi nomor metrik 14 tetapi tidak melebihi nomor metrik 43) | <i>single yarn, of combed fibres; measuring less than 714.29 decitex but not less than 232.56 decitex (exceeding 14 metric number but not exceeding 43 metric number)</i> |
| 9 | 5205.24.00 | -- Ukuran kurang dari 192,31 desiteks tetapi tidak kurang dari 125 desiteks (melebihi nomor metrik 52 tetapi tidak melebihi nomor metrik 80) | <i>single yarn, of combed fibres; measuring less than 192.31 decitex but not less than 125 decitex (exceeding 52 metric number but not exceeding 80 metric number)</i> |
| 10 | 5205.26.00 | -- Ukuran kurang dari 125 desiteks tetapi tidak kurang dari 106,38 desiteks (melebihi nomor metrik 80 tetapi tidak melebihi nomor metrik 94) | <i>single yarn, of combed fibres; measuring less than 125 decitex (exceeding 80 metric number)</i> |
| | | - Benang rangkap (dilipat) atau benang kabel, dari serat tidak disisir : | Multiple (folded) or cabled yarn, of uncombed fibres |
| 11 | 5205.32.00 | -- Ukuran tiap benang tunggal kurang dari 714,29 desiteks tetapi tidak kurang dari 232,56 desiteks (melebihi nomor metrik 14 tetapi tidak melebihi nomor metrik 43 tiap benang tunggal) | <i>multiple (folded)/ cabled yarn, of uncombed fibres; measuring per single yarn < 714.29 decitex but \geq 232.56 decitex (exceeding 14 metric number but not exceeding 43 metric number per single yarn)</i> |
| | | - Benang rangkap (dilipat) atau benang kabel, dari serat disisir : | Multiple (folded) or cabled yarn, of combed fibres |
| | 5205.41.00 | -- Ukuran tiap benang tunggal 714,29 desiteks atau lebih (tidak melebihi nomor metrik 14 tiap benang tunggal) | <i>multiple (folded) or cabled yarn, of combed fibres; measuring per single yarn 714.29 decitex or more (not</i> |

| No | Nomor HS | Uraian Barang | Description of Goods |
|----|--------------|---|---|
| | | | <i>exceeding 14 metric number per single yarn)</i> |
| 12 | 5205.42.00 | -- Ukuran tiap benang tunggal kurang dari 714,29 desiteks tetapi tidak kurang dari 232,56 desiteks (melebihi nomor metrik 14 tetapi tidak melebihi nomor metrik 43 tiap benang tunggal) | <i>multiple (folded) or cabled yarn, of combed fibres; measuring per single yarn < 714.29 decitex but ≥ 232.56 decitex (exceeding 14 metric number but not exceeding 43 metric number per single yarn)</i> |
| 13 | 5205.43.00 | -- Ukuran tiap benang tunggal kurang dari 232,56 desiteks tetapi tidak kurang dari 192,31 desiteks (melebihi nomor metrik 43 tetapi tidak melebihi nomor metrik 52 tiap benang tunggal) | <i>multiple (folded) or cabled yarn, of combed fibres; measuring per single yarn < 232.56 decitex but ≥ 192.31 decitex (exceeding 43 metric number but not exceeding 52 metric number per single yarn)</i> |
| 14 | 5205.47.00 | -- Ukuran tiap benang tunggal kurang dari 106,38 desiteks tetapi tidak kurang dari 83,33 desiteks (melebihi nomor metrik 94 tetapi tidak melebihi nomor metrik 120 tiap benang tunggal) | <i>multiple (folded) or cabled yarn, of combed fibres; measuring per single yarn < 106.38 decitex but ≥ 83.33 decitex (> 94 metric number but ≤ 120 metric number per single yarn)</i> |
| 15 | 5205.48.00 | -- Ukuran tiap benang tunggal kurang dari 83,33 desiteks (melebihi nomor metrik 120 tiap benang tunggal) | <i>multiple (folded) or cabled yarn, of combed fibres; measuring per single yarn less than 83.33 decitex (exceeding 120 metric number per single yarn)</i> |
| | 52.06 | Benang kapas (selain benang jahit), mengandung kapas kurang dari 85 % menurut beratnya, tidak disiapkan untuk penjualan eceran. | <i>Cotton yarn (other than sewing thread), containing less than 85% by weight of cotton, not put up for retail sale.</i> |
| | | - Benang tunggal, dari serat tidak disisir : | <i>Single yarn, of uncombed fibres</i> |
| 16 | 5206.11.00 | -- Ukuran 714,29 desiteks atau lebih (tidak melebihi nomor metrik 14) | <i>single yarn, of uncombed fibres; measuring 714.29 decitex or more (not exceeding 14 metric number)</i> |

| No | Nomor HS | Uraian Barang | Description of Goods |
|----|------------|---|---|
| 17 | 5206.12.00 | -- Ukuran kurang dari 714,29 desiteks tetapi tidak kurang dari 232,56 desiteks (melebihi nomor metrik 14 tetapi tidak melebihi nomor metrik 43) | <i>single yarn, of uncombed fibres; measuring less than 714.29 decitex but not less than 232.56 decitex (exceeding 14 metric number but not exceeding 43 metric number)</i> |
| 18 | 5206.14.00 | -- Ukuran kurang dari 192,31 desiteks tetapi tidak kurang dari 125 desiteks (melebihi nomor metrik 52 tetapi tidak melebihi nomor metrik 80) | <i>single yarn, of uncombed fibres; measuring less than 192.31 decitex but not less than 125 decitex (exceeding 52 metric number but not exceeding 80 metric number)</i> |
| | | - Benang tunggal, dari serat disisir : | Single yarn, of combed fibres |
| 19 | 5206.21.00 | -- Ukuran 714,29 desiteks atau lebih (tidak melebihi nomor metrik 14) | <i>single yarn, of combed fibres; measuring 714.29 decitex or more (not exceeding 14 metric number)</i> |
| 20 | 5206.23.00 | -- Ukuran kurang dari 232,56 desiteks tetapi tidak kurang dari 192,31 desiteks (melebihi nomor metrik 43 tetapi tidak melebihi nomor metrik 52) | <i>single yarn, of combed fibres; measuring less than 232.56 decitex but not less than 192.31 decitex (exceeding 43 metric number but not exceeding 52 metric number)</i> |
| 21 | 5206.24.00 | -- Ukuran kurang dari 192,31 desiteks tetapi tidak kurang dari 125 desiteks (melebihi nomor metrik 52 tetapi tidak melebihi nomor metrik 80) | <i>single yarn, of combed fibres; measuring less than 192.31 decitex but not less than 125 decitex (exceeding 52 metric number but not exceeding 80 metric number)</i> |
| 22 | 5206.25.00 | -- Ukuran kurang dari 125 desiteks (melebihi nomor metrik 80) | <i>single yarn, of combed fibres; measuring less than 125 decitex (exceeding 80 metric number)</i> |
| | | - Benang rangkap (dilipat) atau benang kabel, dari serat tidak disisir : | Multiple (folded) or cabled yarn, of uncombed fibres |

| No | Nomor HS | Uraian Barang | Description of Goods |
|----|------------|---|---|
| 23 | 5206.31.00 | -- Ukuran tiap benang tunggal 714,29 desiteks atau lebih (tidak melebihi nomor metrik 14 tiap benang tunggal) | <i>multiple (folded) or cabled yarn, of uncombed fibres; measuring per single yarn 714.29 decitex or more (not exceeding 14 metric number per single yarn)</i> |
| 24 | 5206.32.00 | -- Ukuran tiap benang tunggal kurang dari 714,29 desiteks tetapi tidak kurang dari 232,56 desiteks (melebihi nomor metrik 14 tetapi tidak melebihi nomor metrik 43 tiap benang tunggal) | <i>multiple (folded) or cabled yarn, of uncombed fibres; measuring per single yarn < 714.29 decitex but ≥ 232.56 decitex (exceeding 14 metric number but not exceeding 43 metric number per single yarn)</i> |
| 25 | 5206.33.00 | -- Ukuran tiap benang tunggal kurang dari 232,56 desiteks tetapi tidak kurang dari 192,31 desiteks (melebihi nomor metrik 43 tetapi tidak melebihi nomor metrik 52 tiap benang tunggal) | <i>multiple (folded) or cabled yarn, of uncombed fibres; measuring per single yarn < 232.56 decitex but ≥ 192.31 decitex (exceeding 43 metric number but not exceeding 52 metric number per single yarn)</i> |
| | | - Benang rangkap (dilipat) atau benang kabel, dari serat disisir : | <i>Multiple (folded) or cabled yarn, of combed fibres</i> |
| 26 | 5206.42.00 | -- Ukuran tiap benang tunggal kurang dari 714,29 desiteks tetapi tidak kurang dari 232,56 desiteks (melebihi nomor metrik 14 tetapi tidak melebihi nomor metrik 43 tiap benang tunggal) | <i>multiple (folded) or cabled yarn, of combed fibres; measuring per single yarn < 714.29 decitex but ≥ 232.56 decitex (exceeding 14 metric number but not exceeding 43 metric number per single yarn)</i> |
| 27 | 5206.45.00 | -- Ukuran tiap benang tunggal kurang dari 125 desiteks (melebihi nomor metrik 80 tiap benang tunggal) | <i>multiple (folded) or cabled yarn, of combed fibres; measuring per single yarn less than 125 decitex (exceeding 80 metric number per single yarn)</i> |

Sumber: BTKI 2022

2. Uraian Lengkap Barang Sejenis atau Barang Yang Secara Langsung Bersaing dengan Barang Terselidik

a. Karakteristik Fisik

Barang Impor:

Barang impor memiliki karakteristik fisik sebagai berikut:

- 1) Benang jahit dari kapas adalah benang rangkap (dilipat) atau benang kabel dari serat kapas yang digulung pada *reels* atau *tubes* dengan berat tidak melebihi 1.000 gram, diberi *finishing treatment* untuk tujuan menjahit dan dengan antihan “Z”, terdiri dari:
 - a) Benang jahit dari kapas, tidak disiapkan untuk penjualan eceran.
 - b) Benang jahit dari kapas, disiapkan untuk penjualan eceran (benang tunggal, rangkap (dilipat) atau kabel yang digulung pada alat gulungan benang).
- 2) Benang kapas (selain benang jahit), tidak disiapkan untuk penjualan eceran, terdiri dari:
 - a) Benang tunggal adalah benang yang tersusun dari satu filamen (monofilamen), atau dua/lebih benang filamen (multifilamen), digabung menjadi satu dengan antihan (*twisted*) atau tanpa antihan (*untwisted*).



- b) Benang rangkap (dilipat) adalah benang yang dibentuk dari dua atau lebih benang tunggal, termasuk yang diperoleh dari monofilamen (benang *twofold*, *threefold*, *fourfold*, dst) dipilin bersama-sama (*twisted together*) dalam satu proses pilinan. Meskipun demikian, benang monofilamen yang digabung tersendiri dengan antihan (*twisted*) tidak termasuk sebagai benang rangkap (dilipat).



- c) Benang kabel adalah benang yang dibentuk dari dua benang atau lebih, yang salah satunya adalah benang rangkap (dilipat), dipilin (*twisted*) bersama-sama dalam satu lipatan atau lebih.



Barang Produksi Pemohon:

Barang produksi Pemohon memiliki karakteristik fisik sebagai berikut:

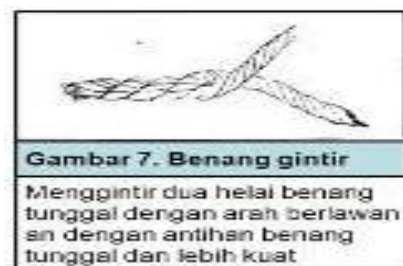
- 1) Benang jahit dari kapas adalah benang rangkap (dilipat) atau benang kabel dari serat kapas yang digulung pada *reels* atau *tubes* dengan berat tidak melebihi 1.000 gram, diberi finishing treatment untuk tujuan menjahit dan dengan antihan “Z”, terdiri dari:
 - a) Benang jahit dari kapas, tidak disiapkan untuk penjualan eceran.
 - b) Benang jahit dari kapas, disiapkan untuk penjualan eceran (benang tunggal, rangkap (dilipat) atau kabel yang digulung pada alat gulungan benang).
- 2) Benang kapas (selain benang jahit), tidak disiapkan untuk penjualan eceran, terdiri dari:
 - a) Benang tunggal adalah benang yang tersusun dari satu filamen (monofilamen), atau dua/lebih benang filamen (multifilamen), digabung menjadi satu dengan antihan (*twisted*) atau tanpa antihan (*untwisted*).



- b) Benang rangkap (dilipat) adalah benang yang dibentuk dari dua atau lebih benang tunggal, termasuk yang diperoleh dari monofilamen (benang *twofold*, *threefold*, *fourfold*, dst) dipilin bersama-sama (*twisted together*) dalam satu proses pilinan. Meskipun demikian, benang monofilamen yang digabung tersendiri dengan antihan (*twisted*) tidak termasuk sebagai benang rangkap (dilipat).



- c) Benang kabel adalah benang yang dibentuk dari dua benang atau lebih, yang salah satunya adalah benang rangkap (dilipat), dipilin (*twisted*) bersama-sama dalam satu lipatan atau lebih.



b. Spesifikasi Teknis

Barang Impor:

Spesifikasi teknis dari barang impor adalah sebagai berikut:

- 1) Benang jahit dari kapas:
 - a) Dilihat dari kandungan kapas:
 - Mengandung kapas 85% atau lebih menurut beratnya

- Mengandung kapas kurang dari 85% menurut beratnya
 - b) Dilihat dari prosesnya, benang jahit tidak dikelantang adalah benang jahit yang memiliki warna alami dari serat pembentuknya, belum dikelantang, dicelup atau dicetak.
- 2) Benang kapas (selain benang jahit) dilihat dari kandungan kapas:
- a) Mengandung kapas 85% atau lebih menurut beratnya
 - b) Mengandung kapas kurang dari 85% menurut beratnya

Barang Produksi Pemohon:

Spesifikasi teknis dari barang produksi Pemohon adalah:

- 1) Benang jahit dari kapas:
- a) Dilihat dari kandungan kapas:
 - Mengandung kapas 85% atau lebih menurut beratnya
 - Mengandung kapas kurang dari 85% menurut beratnya
 - b) Dilihat dari prosesnya, benang jahit tidak dikelantang adalah benang jahit yang memiliki warna alami dari serat pembentuknya, belum dikelantang, dicelup atau dicetak.
- 2) Benang kapas (selain benang jahit) dilihat dari kandungan kapas:
- a) Mengandung kapas 85% atau lebih menurut beratnya
 - b) Mengandung kapas kurang dari 85% menurut beratnya

c. Bahan Baku

Barang Impor:

Bahan baku dari barang impor adalah sebagai berikut:

- 1) Bahan baku benang jahit dari kapas adalah benang tunggal dari kapas, termasuk yang diperoleh dari monofilamen (benang *twofold*, *threefold*, *fourfold*, dst) dan diberi *finishing treatment*.
- 2) Bahan baku benang kapas (selain benang jahit) adalah:
- a) Serat tidak disisir (*carded*): tujuan utama dari *carding* adalah memisahkan serat kapas, meletakkan serat kurang lebih sejajar, dan membersihkan serat dari kandungan selain serat kapas untuk sebagian besar atau keseluruhan serat.
 - b) Serat disisir (*combed*) adalah proses membersihkan serat tidak disisir dari sisa-sisa kandungan di luar serat dan menghilangkan serat pendek, sehingga hanya tersisa serat panjang dari serat

kapas yang diletakkan sejajar.

Barang Produksi Pemohon:

Barang Produksi Pemohon memiliki bahan baku yang sama dengan barang impor, yaitu:

- 1) Bahan baku benang jahit dari kapas adalah benang tunggal dari kapas, termasuk yang diperoleh dari monofilamen (benang *twofold*, *threefold*, *fourfold*, dst) dan diberi *finishing treatment*.
- 2) Bahan baku benang kapas (selain benang jahit) adalah:
 - a) Serat tidak disisir (*carded*): tujuan utama dari *carding* adalah memisahkan serat kapas, meletakkan serat kurang lebih sejajar, dan membersihkan serat dari kandungan selain serat kapas untuk sebagian besar atau keseluruhan serat.
 - b) Serat disisir (*combed*) adalah proses membersihkan serat tidak disisir dari sisa-sisa kandungan di luar serat dan menghilangkan serat pendek, sehingga hanya tersisa serat panjang dari serat kapas yang diletakkan sejajar.

d. Kegunaan

Barang Impor:

Kegunaan dari barang impor adalah sebagai berikut:

- 1) benang jahit dari kapas adalah untuk menjahit.
- 2) benang kapas (selain benang jahit) adalah benang dari kapas yang tidak ditujukan untuk menjahit, melainkan untuk ditenun atau dirajut menjadi kain.

Barang Produksi Pemohon:

Barang Produksi Pemohon memiliki kegunaan yang sama dengan barang impor, yaitu:

- 1) kegunaan benang jahit dari kapas adalah untuk menjahit.
- 2) kegunaan benang kapas (selain benang jahit) adalah untuk ditenun atau dirajut menjadi kain.

3. Pernyataan Barang Sejenis atau Barang yang Secara Langsung Bersaing

Berdasarkan penjelasan yang disampaikan pada huruf a-d di atas, Pemohon meyakini bahwa barang yang diproduksi Pemohon adalah **barang sejenis**

dengan barang impor, dilihat dari **karakteristik fisik, spesifikasi teknis, bahan baku, dan kegunaan.**

E. INFORMASI LONJAKAN JUMLAH BARANG IMPOR

1. Jumlah Impor

Tabel 4. Jumlah Impor Absolut dan Relatif

| Uraian | Satuan | Tahun | | | | Perubahan (%) | | | Tren 2019-2022 (%) |
|--|--------|--------|--------|--------|--------|---------------|-----------|-----------|--------------------|
| | | 2019 | 2020 | 2021 | 2022 | 2019-2020 | 2020-2021 | 2021-2022 | |
| Jumlah Impor | Ton | 14.843 | 12.588 | 20.873 | 29.908 | (15,19) | 65,82 | 43,28 | 29,79 |
| Produksi Nasional | Indeks | 100 | 66,40 | 82,65 | 72,55 | (33,60) | 24,46 | (12,22) | (7,17) |
| Impor Relatif Terhadap Produksi Nasional | Indeks | 100 | 127,71 | 170,15 | 277,73 | 27,71 | 33,23 | 63,23 | 39,81 |

Sumber: Badan Pusat Statistik (BPS), Pemohon, diolah

Sebagaimana terlihat pada Tabel 4 diatas, jumlah impor secara absolut mengalami lonjakan dengan tren sebesar 29,79% selama periode 2019-2022. Pada Tahun 2020 jumlah impor mengalami penurunan menjadi sebesar 12.588 ton dari sebelumnya sebesar 14.843 ton pada Tahun 2019 atau turun sebesar 15,19%. Pada Tahun 2021 jumlah impor mengalami peningkatan menjadi sebesar 20.873 ton dari sebelumnya sebesar 12.588 ton pada Tahun 2020, atau naik 65,82%. Pada Tahun 2022 jumlah impor mengalami peningkatan menjadi sebesar 29.908 ton dari sebelumnya sebesar 20.873 ton pada Tahun 2021, atau naik 43,28%.

Jumlah impor secara relatif mengalami lonjakan dengan tren sebesar 39,81% selama periode 2019-2022. Pada Tahun 2020 jumlah impor mengalami peningkatan menjadi sebesar 127,71 poin indeks dari sebelumnya sebesar 100 poin indeks pada Tahun 2019 atau naik sebesar 27,71%. Pada Tahun 2021 jumlah impor mengalami peningkatan menjadi sebesar 170,15 poin indeks dari sebelumnya sebesar 127,71 poin indeks pada Tahun 2020, atau naik 33,23%. Pada Tahun 2022 jumlah impor mengalami peningkatan menjadi sebesar 277,73 poin indeks dari sebelumnya sebesar 170,15 poin indeks pada Tahun 2021, atau naik 63,23%.

2. Pangsa Impor

Tabel 5. Pangsa Negara Asal Impor

| Negara | Tahun | | | | | | | |
|----------------|---------------|------------|---------------|------------|---------------|------------|---------------|------------|
| | 2019 | | 2020 | | 2021 | | 2022 | |
| | Volume (Ton) | Pangsa (%) | Volume (Ton) | Pangsa (%) | Volume (Ton) | Pangsa (%) | Volume (Ton) | Pangsa (%) |
| Vietnam | 5.307 | 35,75 | 3.670 | 29,15 | 9.574 | 45,87 | 13.652 | 45,65 |
| RRT | 5.633 | 37,95 | 4.554 | 36,18 | 5.569 | 26,68 | 8.314 | 27,80 |
| India | 1.628 | 10,97 | 1.736 | 13,79 | 1.887 | 9,04 | 2.452 | 8,20 |
| Turki | 0,04 | 0,00 | 623 | 4,95 | 414 | 1,99 | 2.201 | 7,36 |
| Pakistan | 628 | 4,23 | 334 | 2,65 | 1.167 | 5,58 | 1.165 | 3,89 |
| Thailand | 521 | 3,51 | 577 | 4,58 | 627 | 3,00 | 1.056 | 3,53 |
| Negara Lainnya | 1.126 | 7,58 | 1.095 | 8,7 | 1.636 | 7,84 | 1.069 | 3,57 |
| Total | 14.843 | 100 | 12.588 | 100 | 20.873 | 100 | 29.908 | 100 |

Sumber : BPS, diolah

Berdasarkan pada tabel 5 di atas, pada Tahun 2022 pangsa pasar impor produk benang kapas di pasar domestik di dominasi oleh Vietnam dengan pangsa pasar impor sebesar 45,65%, diikuti oleh RRT dengan pangsa pasar impor sebesar 27,80%, India dengan pangsa pasar impor sebesar 8,20%, Turki dengan pangsa pasar impor sebesar 7,36%, Pakistan dengan pangsa pasar impor sebesar 3,89%, Thailand dengan pangsa pasar impor sebesar 3,53%, dan Negara Lainnya < 3% yaitu sebesar 3,57%.

F. INFORMASI KERUGIAN PEMOHON

Tabel 6. Indikator Kinerja Pemohon

| No | Uraian | Satuan | Tahun | | | | Pertumbuhan (%) | | | Tren 2019-2022 (%) |
|----|-----------------------|--------|-------|--------|--------|--------|-----------------|--------|---------|--------------------|
| | | | 2019 | 2020 | 2021 | 2022 | 19-20 | 20-21 | 21-22 | |
| 1 | Produksi | Indeks | 100 | 85,98 | 90,78 | 78,41 | (14,02) | 5,59 | (13,63) | (6,53) |
| 2 | Penjualan Domestik | Indeks | 100 | 85,44 | 99,23 | 79,19 | (14,56) | 16,13 | (20,19) | (5,36) |
| 3 | Produktivitas | Indeks | 100 | 107,85 | 110,95 | 109,02 | 7,85 | 2,87 | (1,74) | 2,91 |
| 4 | Kapasitas Terpakai | Indeks | 100 | 86,23 | 91,05 | 78,64 | (13,77) | 5,59 | (13,63) | (6,45) |
| 5 | Keuntungan / Kerugian | Indeks | 100 | 7,83 | 38,45 | 8,01 | (92,17) | 391,11 | (79,17) | (45,02) |
| 6 | Tenaga Kerja | Indeks | 100 | 79,72 | 81,83 | 71,92 | (20,28) | 2,65 | (12,11) | (9,18) |

Sumber: Pemohon, diolah

a. Produksi

Selama periode 2019-2022, produksi Pemohon mengalami penurunan dengan tren sebesar 6,53%. Pada tahun 2019 produksi Pemohon sebesar 100 poin indeks, mengalami penurunan menjadi sebesar 85,98 poin indeks atau sebesar 14,02% pada tahun 2020. Selanjutnya pada tahun 2021, produksi Pemohon mengalami peningkatan sebesar 5,59%, kemudian pada tahun 2022 produksi Pemohon kembali mengalami penurunan sebesar 78,41 poin indeks atau sebesar 13,63% bila dibandingkan dengan tahun sebelumnya. Penurunan produksi terjadi dikarenakan adanya penurunan permintaan atas produk yang dihasilkan karena barang impor membanjiri pasar dalam negeri.

b. Penjualan domestik

Penjualan domestik selama periode 2019-2022 mengalami penurunan dengan tren sebesar 5,36%. Pada tahun 2019 penjualan domestik sebesar 100 poin indeks, mengalami penurunan menjadi 85,44 poin indeks atau sebesar 14,56% pada tahun 2020. Pada tahun 2021 penjualan domestik mengalami peningkatan sebesar 16,13%, kemudian pada tahun 2022 penjualan domestik kembali mengalami penurunan sebesar 79,19 poin indeks atau sebesar 20,19% bila dibandingkan dengan tahun sebelumnya. Hal tersebut disebabkan oleh membanjirnya barang impor yang mendominasi pasar dalam negeri.

c. Produktivitas

Pada tahun 2019, produktivitas sebesar 100 poin indeks, mengalami peningkatan menjadi sebesar 107,85 poin indeks atau sebesar 7,85% pada tahun 2020. Selanjutnya pada tahun 2021, produktivitas mengalami peningkatan menjadi sebesar 110,95 poin indeks atau sebesar 2,87% sedangkan di tahun 2022 produktivitas mengalami sedikit penurunan menjadi sebesar 109,02 poin indeks. Selama periode 2019-2022, produktivitas mengalami peningkatan dengan tren sebesar 2,91% dikarenakan pengurangan jumlah tenaga kerja yang besar.

d. Kapasitas Terpakai

Selama periode 2019-2022, kapasitas terpakai Pemohon mengalami penurunan dengan tren sebesar 6,45% yang diakibatkan oleh lonjakan jumlah impor selama periode tersebut. Penurunan kapasitas terpakai terbesar terjadi pada tahun 2020 sebesar 13,77% bila dibandingkan dengan tahun 2019. Selanjutnya pada tahun 2021, kapasitas terpakai mengalami peningkatan sebesar 5,59% sedangkan pada tahun 2022 kapasitas terpakai mengalami penurunan sebesar 13,63%.

e. Keuntungan/Kerugian

Pemohon mengalami penurunan keuntungan dengan tren sebesar 45,02% selama periode 2019-2022. Pada tahun 2019, keuntungan Pemohon sebesar 100 poin indeks dan selanjutnya pada tahun 2020 Pemohon mengalami penurunan keuntungan sebesar 92,17% dimana pada tahun yang sama berkurangnya penjualan domestik dan meningkatnya jumlah impor pada produk tersebut. Pada tahun 2021 Pemohon mengalami peningkatan keuntungan sebesar 38,45 poin indeks dan masih dibawah pada tahun sebelumnya. Sedangkan pada tahun 2022, Pemohon kembali mengalami penurunan keuntungan sebesar 79,17%.

f. Tenaga Kerja

Telah terjadi pengurangan jumlah tenaga kerja dengan tren sebesar 9,18% selama periode 2019-2022. Pada tahun 2019 jumlah tenaga kerja sebanyak 100 poin indeks, mengalami penurunan menjadi sebanyak 79,72 poin indeks atau sebesar 20,28% pada tahun 2020. Kemudian pada tahun 2021 jumlah tenaga kerja mengalami peningkatan menjadi sebanyak 81,83 poin indeks dan pada tahun 2022 jumlah tenaga kerja kembali mengalami penurunan menjadi sebanyak 71,92 poin indeks.

G. Pangsa Pasar

Tabel 7. Kapasitas Terpasang Nasional, Konsumsi Nasional dan Pangsa Pasar

| No. | Indikator | Satuan | 2019 | 2020 | 2021 | 2022 | Perubahan (%) | | | Tren 2019-2022 (%) |
|-----|--------------------------------|--------|--------|--------|--------|--------|---------------|-----------|-----------|--------------------|
| | | | | | | | 2019-2020 | 2020-2021 | 2021-2022 | |
| 1 | Konsumsi Nasional | Indeks | 100 | 85,80 | 99,36 | 85,14 | (14,20) | 15,80 | (14,31) | (3,30) |
| 2 | Penjualan Domestik Pemohon | Indeks | 100 | 85,44 | 99,23 | 79,19 | (14,56) | 16,13 | (20,19) | (5,36) |
| 3 | Penjualan Domestik Non Pemohon | Indeks | 100 | 86,69 | 89,31 | 66,59 | (13,31) | 3,03 | (25,45) | (11,22) |
| 4 | Jumlah Impor | Ton | 14.843 | 12.588 | 20.873 | 29.908 | (15,19) | 65,82 | 43,28 | 29,79 |
| 5 | Pangsa Pasar Pemohon | Indeks | 100 | 99,58 | 99,86 | 93,01 | (0,42) | 0,29 | (6,87) | (2,12) |
| 6 | Pangsa Pasar Non Pemohon | Indeks | 100 | 101,03 | 89,89 | 78,21 | 1,03 | (11,03) | (12,99) | (8,19) |
| 7 | Pangsa Pasar Impor | Indeks | 100 | 98,84 | 141,53 | 236,65 | (1,16) | 43,19 | 67,21 | 34,22 |

Sumber: Pemohon, IDN dan BPS, diolah

Pangsa pasar pemohon dan Non pemohon selama Tahun 2019-2022 terus mengalami penurunan dengan tren sebesar 2,12% dan 8,19%. Sebaliknya pangsa pasar impor selama Tahun 2019-2022 terjadi peningkatan dengan tren sebesar 34,22%. Dengan demikian selama Tahun 2019-2022 pangsa pasar impor telah mengambil alih pangsa pasar Pemohon dan Non pemohon.

H. PERKEMBANGAN TIDAK TERDUGA (*Unforeseen Development*)

1. Vietnam

Terjadinya lonjakan jumlah impor benang kapas dari negara Vietnam tidak dapat diprediksi sebelumnya (*unforeseeable/unexpected*), hal ini dikarenakan telah terjadinya peningkatan investasi dan ekspansi secara signifikan pada industri benang di Vietnam sejak tahun 2019. Penambahan investasi tersebut yaitu meningkatnya pemasangan spindle yang bertambah 250.000 mata spindle pada tahun 2021 dibanding tahun 2020 dengan kapasitas 2.600.000 Ton dan terus bertambah pada tahun 2022 sebesar 100.000 mata spindle dibandingkan tahun 2021 dengan kapasitas 2.700.000 Ton, sebagaimana dapat dilihat pada Tabel berikut:

Tabel 8. Investasi dan Penambahan Aset Tetap pada Industri Benang Kapas di Vietnam

| Uraian | Satuan | 2019 | 2020 | 2021 | 2022 |
|---------------------------------|--------|-----------|-----------|-----------|-----------|
| Jumlah spindle | (000) | 8.250 | 8,250 | 8,500 | 8,600 |
| Jumlah Rotors | (000) | 138 | 138 | 138 | 138 |
| Kapasitas produksi benang kapas | Ton | 2.500.000 | 2.500.000 | 2.600.000 | 2.700.000 |
| Produksi benang kapas | Ton | 2.500.000 | 2.500.000 | 2.600.000 | 2.700.000 |

Sumber: *Vietnam Customs, Trade Association and Post's estimate*

Berdasarkan Tabel 8 di atas dapat dilihat bahwa investasi di sektor industri tekstil Vietnam meningkat setiap tahunnya selama periode 2019-2022 yang menyebabkan meningkatnya penambahan aset tetap baru dan kapasitas produksi pada periode yang sama. Selain meningkatkan kapasitas produksi, Negara Vietnam juga memproduksi *full capacity* pada seluruh industri spinning sebagai akibat dari meningkatnya Investasi dan Aset tetap pada sektor industri spinning di Vietnam. Hal ini merupakan kondisi yang tidak terduga (*unforeseen*) yang secara tidak langsung menyebabkan meningkatnya ekspor produk benang kapas asal Vietnam ke negara-negara lain, termasuk Indonesia.

2. China

1. Pengalihan tujuan Ekspor dari China menjadi ke Indonesia karena kebijakan pelarangan impor di Amerika Serikat

Pada tanggal 21 Juni 2022 Amerika Serikat mengeluarkan kebijakan untuk melarang impor dari China khususnya dari negara Xinjiang (wilayah bagian China penghasil terbesar kapas dan produk turunannya) apabila produk tersebut dibuat

oleh tenaga kerja Uyghur di Xinjiang, China. Peraturan tersebut diatur dalam *section 2 of public law No. 117-78, An Act to ensure that goods made with forced labor in the Xinjiang Uyghur Autonomous Region of the People's Republic of China do not enter the United States America, and for other purpose (the Uyghur Forced Labor Prevention Act)*. Dengan diberlakukannya peraturan tersebut menyebabkan impor produk benang kapas dari China di Negara Amerika Serikat mengalami penurunan drastis sehingga Negara China mengalihkan tujuan ekspor benang kapas ke Negara lain, salah satunya ke Negara Indonesia dan menyebabkan lonjakan impor Sebagaimana terlihat pada tabel di bawah.

Tabel 1. Data ekspor benang kapas dari China

| Uraian | Satuan | Tahun | | | | Perubahan (%) | Tren 19-22 (%) |
|----------------------------------|--------|-------|-------|-------|-------|---------------|----------------|
| | | 2019 | 2020 | 2021 | 2022 | 21-22 | |
| Impor Amerika Serikat dari China | Ton | 391 | 386 | 381 | 267 | (29,92) | (10,93) |
| Impor Indonesia dari China | Ton | 5.633 | 4,554 | 5,569 | 8,313 | 49.29 | 14,67 |

Sumber: Trade map

Berdasarkan tabel 10 diatas dengan adanya peraturan pelarangan impor produk kapas dan turunannya di Amerika Serikat dari Negara China menyebabkan penurunan impor secara drastis pada tahun 2022 menjadi hanya sebesar 267 Ton sedangkan secara tren terjadi penurunan sebesar 10,93% selama tahun 2019-2022. Selanjutnya, dengan terjadinya pengalihan ekspor yang sebelumnya ke Amerika Serikat menjadi ke Negara Indonesia mengakibatkan lonjakan impor di Indonesia yang signifikan pada tahun 2022 dibanding tahun 2021 yaitu sebesar 49,29% dan secara tren meningkat sebesar 14,67%.

Dengan adanya pemberian subsidi terhadap ekspor produk benang kapas China dan pengalihan tujuan ekspor yang sebelumnya dari China ke Amerika Serikat menjadi ke Negara Indonesia merupakan kondisi hal yang tidak terduga (*unforeseen development*) yang menyebabkan lonjakan impor produk benang kapas di Indonesia.

I. KESEDIAAN UNTUK BEKERJA SAMA

Pemohon bersedia untuk bekerja sama sepenuhnya sepanjang proses penyelidikan dalam rangka penerapan Tindakan Pengamanan Perdagangan (*Safeguards*) terhadap lonjakan jumlah impor barang Benang Kapas.

Jakarta, 16 September 2023



ASOSIASI PERTEKSTILAN INDONESIA
INDONESIAN TEXTILE ASSOCIATION

Jemmy Kartiwa
Ketua Umum

LAMPIRAN 1:

NAMA DAN ALAMAT IMPORTIR

| NO | NAMA PERUSAHAAN | ALAMAT |
|-----------|---|---|
| 1 | PT. Primarindo Asia Infrastructure | Jl. Tanjung Karang 3-4A Jakarta |
| 2 | PT. Benang Amefird Indonesia | Jl. Cisirung No.105 Cangkuang Wetan, Bandung |
| 3 | PT. Surya Berkas Indonesia | Jl. Delanggu Polanharjo Km. 2.6 Klaten Jateng |
| 4 | PT. Greentex Indonesia Utama II | Jl. Raya Banjaran Barat Km. 16,5 Batukarut, Bandung |
| 5 | PT. Mega Foamworks Indonesia | Kawasan GIIC Blok. CF Cikarang Pusat, Bekasi |
| 6 | PT. Ihchi Textile Mills & Machinery | Jl. Cibaligo No. 149A Cimahi, Bandung |
| 7 | PT. Winnersumbiri Knitting Factory | Jl. KH. Agus Salim No.18 Cipondoh, Tangerang |
| 8 | PT. Kurabo Manunggal Textile Industries | Menara Cakrawala Lt. 7 Jl. MH Thamrin 9 Jakarta |
| 9 | PT. Triputra Textile Industry | Jl. Raya Laswi No.8 Majalaya Bandung |
| 10 | PT. Textile One Indonesia | Dusun Gintungtengah Klari, Karawang, Jabar |
| 11 | PT. Wintai Garment | Jl. Tanah Abang IV No. 31 Petojo Selatan |
| 12 | PT. Ocean Asia Industry | Jl. Raya Serang Km. 62 No. 178 Cikande, Serang Banten |
| 13 | PT. Jiale Indonesia Textile | Jl. Pecangaan Bate No. 288 Ds. Gemulung, Jepara |
| 14 | PT. Sejahtera Bintang Abadi Textile Tbk | Jl. Raya Cicalengka Majalaya Km.5 Bandung |
| 15 | PT. Soljer Abadi | Jl. Raya Rancaekek Majalaya Bandung |
| 16 | PT. Indo Taichen Textile Industry | Jl. Gatot Subroto Km. 3 Jatiuwung Tangerang |
| 17 | PT. Perdana Firsta Garment | Jl. Raya Batujajar Km.1,2 Padalarang Bandung |
| 18 | PT. PAN Pasific Jakarta | Jl. Kalimantan Blok D-27 Cilincing Jakarta |
| 19 | PT. Micro Garment | Jl. Raya Rancaekek Majalaya Bandung |
| 20 | PT. Multindo Velvet Industries | Kawasan Indsutri Wahyu Sejahtera Blok E Bogor |

NAMA DAN ALAMAT ASOSIASI IMPORTIR

| NO | ASOSIASI | ALAMAT |
|-----------|--|--|
| 1 | GINSI (Gabungan Importir Nasional Seluruh Indonesia) | Jl. Raya Kelapa Nias No.27, RT.1/RW.12, Pegangsaan Dua, Kec. Klp. Gading, Kota Jkt Utara, Daerah Khusus Ibukota Jakarta 14240, Indonesia |

LAMPIRAN 2

NAMA DAN ALAMAT EKSPORTIR/PEMASOK DARI NEGARA PENGEKSPOR

| NO | NAMA PERUSAHAAN | ALAMAT |
|-----------|--|--|
| 1 | Huafang Group of China | VG CX+V74, Chengbei Rd, Zhangjiagang, Suzhou, Jiangsu, China, 215638 |
| 2 | Weiqiao Textile Company Limited | No. 1, Wei Fang Road, Economic Development Zone, Zouping County, Shandong Province |
| 3 | Shijiazhuang Changshan Textile Co., Ltd. | 183 Heping E Rd, Chang'An, Shijiazhuang, Hebei, China, 050010 |
| 4 | Lu Thai Textile Co. Ltd. | no 81 Songling East Rd, Zibo, Shandong, 255100, China |



1 November 2023

(23-7382)

Page: 1/2

Committee on Safeguards

Original: English

**NOTIFICATION UNDER ARTICLE 12.1(A) OF THE AGREEMENT
ON SAFEGUARDS ON INITIATION OF AN INVESTIGATION
AND THE REASONS FOR IT**

INDONESIA

Cotton Yarn

The following communication, dated and received on 31 October 2023, is being circulated at the request of the delegation of Indonesia.

1 THE DATE OF INITIATION OF SAFEGUARD INVESTIGATION

The investigation was initiated on 27 October 2023.

2 PRODUCT UNDER INVESTIGATION

Cotton Yarn under Harmonized System (HS.) Code 5204.11.10, 5204.19.00, 5204.20.00, 5205.11.00, 5205.12.00, 5205.21.00, 5205.22.00, 5205.24.00, 5205.26.00, 5205.32.00, 5205.41.00, 5205.42.00, 5205.43.00, 5205.47.00, 5205.48.00, 5206.11.00, 5206.12.00, 5206.14.00, 5206.21.00, 5206.23.00, 5206.24.00, 5206.25.00, 5206.31.00, 5206.32.00, 5206.33.00, 5206.42.00, and 5206.45.00 according to Indonesia Customs Tariff Book 2022.

3 REASONS FOR INITIATION OF INVESTIGATION PROCEDURE

- (i) The Investigating Authority initiated a safeguard investigation following an evaluation of the application documents filed by the Applicant, which constitutes a major proportion of the total domestic production of the subject goods in Indonesia.
- (ii) The non-confidential summary of the application can be found at the internet address below, following the link: <https://bit.ly/DokumenPenyelidikanProdukBenangKapas>

4 POINT OF CONTACT FOR THE INVESTIGATION

The contact information of the Investigating Authority for correspondence is:

THE INDONESIAN SAFEGUARDS COMMITTEE

Komite Pengamanan Perdagangan Indonesia (KPPI)
Jl. M.I. Ridwan Rais No.5, Building I, 5th floor, Jakarta 10110
Telephone / Facsimile: (62-21) 385 7758
E-mail: kppi@kemendag.go.id

5 DEADLINES AND PROCEDURES TO PRESENT EVIDENCE AND VIEWS BY INTERESTED PARTIES

- (i) Those having substantial interest and wishing to be considered as interested parties in this investigation should submit a written request within a period of 15 days in Indonesia from the date of initiation to the Investigating Authority. All submissions and requests made by interested parties must be sent both in a written letter and in electronic format, and must

indicate the name, address, e-mail address, telephone, and fax number of the interested parties.

- (ii) In accordance with article 3.1 WTO Agreement on Safeguard, the Investigating Authority will conduct a hearing in order to provide opportunities for those Members who have a substantial interest to present their evidence and views. The hearing is scheduled to be held on Tuesday, 28 November 2023 from 10.00 - 12.00 am (GMT+7). All interested parties, who wish to participate in the hearing and all written evidence and views, submitted to the Investigating Authority not later than 21 November 2023. Registration on the day of the hearing (28 November 2023) will start at 9.00 am (GMT+7) and only authorized representatives will have access to the hearing.
-



PRESS CONFERENCE

Public Relations Bureau

G-d. I Lt. 2, Jl. MI Ridwan Rais No. 5, Jakarta 10110

Tel: 021-3860371/Fax: 021-3508711

www.kemendag.go.id



KPPI Starts Investigation of Safeguards Security Measures Trade Over Surge in Imports of Cotton Yarn

Jakarta, 27 October 2023 – The Indonesian Trade Safeguards Committee (KPPI) has initiated an investigation into Trade *Safeguards Measures* regarding the surge in the number of imports of goods in the form of cotton yarn today, Friday, (27/10). The commodity in question includes 27 8-digit *Harmonized System* (HS) numbers, namely 5204.11.10, 5204.19.00, 5204.20.00, 5205.11.00, 5205.12.00, 5205.21.00, 5205.22.00, 5205.24.00, 5205.26.00, 5205.32.00, 5205.41.00, 5205.42.00, 5205.43.00, 5205.47.00, 5205.48.00, 5206.11.00, 5206.12.00, 5206.14.00, 5206.21.00, 5206.23.00, 5206.24.00, 5206.25.00, 5206.31.00, 5206.32.00, 5206.33.00, 5206.42.00, and 5206.45.00 based on the 2022 Indonesian Customs Tariff Book (BTK).

Plt. KPPI Chairman Nugraheni Prasetya Hastuti revealed that the investigation was based on a request from the Indonesian Textile Association (API), which represents the domestic yarn producing industry. KPPI received the application from API on September 18 2023.

"From the initial evidence of the application submitted by API, KPPI found that there was a surge in the number of imports of cotton yarn. In addition, there are initial indications of serious losses or the threat of serious losses experienced by domestic industry. These indicators include a decline in production volume, domestic sales, used capacity, profits; reduced workforce; as well as the decline in the domestic industry's market share in the domestic market," explained Nugraheni.

Based on data from the Central Statistics Agency (BPS) in the last four years (2019-2022), there has been an increase in the number of imports of cotton yarn with a trend of 29.79 percent. In 2019 the amount of imports was 14,843 tons. In 2020 it will be 12,588 tons. Then in 2021 it will increase by 65.82 percent to 20,873 tons. Furthermore, in 2022 it will increase by 43.28 percent to 29,908 tons.

Countries of origin for imports of cotton thread goods are Vietnam at 45.65 percent, People's Republic of China (27.80 percent), India (8.20 percent), Turkey (7.36 percent), Pakistan (3.89 percent), Thailand (3.53 percent), and other countries amounted to (3.57 percent).

KPPI invites all interested parties to register as Yang Parties
Interested parties no later than 15 days from the date of this announcement and submitted in writing
to:

Indonesian Trade Security Committee

Ministry of Trade of the Republic of Indonesia

Jl. MI Ridwan Rais No. 5, Building I, Floor 5, Jakarta 10110

Tel/Fax: (021) 3857758

E-mail: kppi@kemendag.go.id

--finished--

More information contact:

M. Rivai Abbas

**Plt. Head of Public Relations Bureau
of the Ministry of Trade**

Email: Pusathumas@kemendag.go.id

Indonesian Trade Security Committee Email:

kppi@kemendag.go.id

**INITIAL EVIDENCE FOR INVESTIGATION REQUESTS
IN THE FRAMEWORK OF IMPOSITION OF MEASURES
TRADE SAFEGUARDS
SURGE IN THE NUMBER OF IMPORTS OF YARN GOODS
COTTON THAT COMES INTO HS NUMBERS:**

**5204.11.10, 5204.19.00, 5204.20.00, 5205.11.00,
5205.12.00, 5205.21.00, 5205.22.00, 5205.24.00,
5205.26.00, 5205.32.00, 5 205.41.00, 5205.42.00,
5205.43. 00, 5205.47.00, 5205.48.00, 5206.11.00,
5206.12.00, 5206.14.00, 5206.21.00, 5206.23.00,
5206.24.00, 5206.25.00, 5206.31.0 0, 5206.32.00,
5206.33.00, 5206.42.00, and 5206.45.00**

NOT SECRET

**DELIVERED BY
INDONESIAN TEXTILE ASSOCIATION (API)
YEAR 2023**

A. GENERAL

The Indonesian Textile Association (API), hereinafter referred to as the Petitioner, represents as many as 15 (fifteen) Cotton Yarn Industry companies, with this submit an application to the Indonesian Trade Security Committee (KPPI) to carry out investigations in the context of Security Measures Trade (*Safeguards*) against imports of Cotton Yarn goods which result in serious losses or threats of serious losses.

Our request is based on a surge in the volume of imports of yarn cotton with tariff post number (*Harmonized System*): HS. 5204.11.10, 5204.19.00, 5204.20.00, 5205.11.00, 5205.12.00, 5205.21.00, 5205.22.00, 5205.24.00, 5205.26.00, 5205.32.00, 5205.41.00, 5205.42.00, 5205.43.00, 5205.47.00, 5205.48.00, 5206.11.00, 5206.12.00, 5206.14.00, 5206.21.00, 5206.23.00, 5206.24.00, 5206.25.00, 5206.31.00, 5206.32.00, 5206.33.00, 5206.42.00, and 5206.45.00, in accordance with the Indonesian customs Tariff Book (BTKI) in 2022. The increase in the volume of imported goods has provided impact on the decline in the Applicant's performance as a Domestic Industry (IDN) which produces similar goods or which directly competes with imported goods.

To support the application submitted, we hereby submit completeness of the initial evidence of the application and supported by documents which are required in accordance with the provisions of Government Regulation Number 34 of the Year 2011 (PP 34/2011) concerning Anti-Dumping Measures, Compensation Measures and Trade Security Measures and Decrees of the Minister of Industry and Republic of Indonesia Trade Number 85 of 2003 (Kepmenperindag 85/2003) concerning Procedures and Requirements for Requests for Investigation of Securing Domestic Industry from the Consequences of a Surge in Imports.

B. APPLICANT

Name : Indonesian Textile Association (API)
Address : Graha Surveyor Indonesia 16th floor
Jl. Gen. Gatot Subroto Kav. 56, South Jakarta
Tel/Fax : 021-5272171 / 021-5272166
E-mail : secretariat@bpnapi.org

Chairman : Jemmy Kartiwa Sastraatmadja
 Contact Person : Andrew Purnama
 Position : Secretary General of API

The list of names of companies represented by the Applicant in this investigation is as follows:

Table 1. List of Manufacturers Represented by the Applicant

| Company Name 1. PT. | Address | Phone & Email |
|--|---|--|
| Bitratex Industries | Jl. Taman Curie No.3, Pasir Kaliki, Kec. Cicendo, Bandung City, West Java 40171 | (022) 4266592 bitrasmg@bitratex.com |
| 2. PT. Delta Merlin Clothing Textiles | Jl. Raya Timur, Kenatan, Bumiaji, District. Sragen, Sragen Regency, Central Java 57254 (KM 10) | (0271) 887008 duniatex@gmail.com |
| 3. PT. Textile Clothing World Delta | Jl. Raya Semarang-Demak Km. 14, Tambakroto, Sayung, Batu Lor, Batu, Kec. Demak, Demak Regency, Central Java 59563 | (024) 6514232 deltaduniasandang@gmail.com |
| 4. PT. Textile World Delta | Jl. Maospati - Solo, Gerdu, Jetis, Kec. Jaten, Karanganyar Regency, Central Java 57731 | (0271) 622878 personaliaddtpondok@gmail.com |
| 5. PT. Faithful World of Original Textile Clothing | Jl. H. Fachrudin No.36, RT.9/ RW.5, Petamburan, Tanah Abang District, Central Jakarta City, Special Capital Region of Jakarta 10250 | (0271) 827623 sales@duniatex.com |
| 6. PT. Delta Merlin Textile World | Pd. III, Pondok, Kec. Grogol, Sukoharjo Regency, Central Java 57552, Indonesia | (0271) 653113 personneladmdt5@gmail.com |
| 7. PT. Damaitex | Jl. Simongan No. 100, Ngemplak Simongan, Kec. West Semarang, Semarang City, Central Java 50148 | (024) 7605804 ptdamirex_smg@yahoo.co.id |
| 8. PT. Embee Plumbon Jl. KH. | Mas Mansyur Kav. 126, Central Jakarta 10220 | (021) 29529456 embee@embee.co.id |

| Company name | Address | Phone & Email |
|---------------------------------------|---|---|
| 9. PT. Lotus Indah Textile Industries | Jl. Prof. Dr. Sutami No. 111 B, Sukarasa, Kec. Sukasari, Bandung City, West Java 40153 | (022) 2004450 litingn@lotusindah.co.id |
| 10. PT. Gokak Indonesia Jalan Ateng | Ilyas No 1 RT 02/08, Kampung Muhara, Citeurep, Bogor 16810, West Java | (081) 5107-44377 factory@gokakindonesia.c uncle |
| 11. PT. Kewalram Indonesia | Jalan Raya Rancaekek KM 25, Kab. Sumedang | (+62-22) 7798346 info@kewalram.co.id |
| 12. PT. Primayudha Mandirijaya | Hamlet 3, Ngadirojo, District. Ampel, Boyolali Regency, Central Java 57352 | (021) 57903640 marketing@primayudha.c uncle |
| 13. PT. Original Sariwarna | Jl. Hos Cokroaminoto no. 28 Pucang Sawit, Surakarta, Central Java. Indonesia 57125 | +62 271 648747 publications.swag@gmail.co m |
| 14. PT. Sinar Pantja Djaja | Jl. Condrokusumo Raya No.1, Bongsari, Kec. West Semarang, Semarang City, Central Java 50148 | (024) 7603888 spd_smg@sritex.co.id |
| 15. PT. Sri Rejeki Isman, Tbk. | Jl. KH. Samanhudi 88, Jetis, Sukoharjo, Solo – Central Java, Indonesia | (62-71) 593188 hrd@sritex.co.id |

Source: Applicant, processed

C. APPLICANT'S PROPORTION OF PRODUCTION

Table 2. Total Production and Production Proportion in 2022

| Description | Proportion (%) |
|--------------------------|----------------|
| Applicant Production | 67.60 |
| Non Applicant Production | 32.40 |
| National Production | 100 |

Source: IDN and Applicant, processed

The Applicant's total production in 2022 is 67.60% of the total national production. Based on the data in table 2 above, this is in accordance with the provisions of Government Regulation (PP) 34 of 2011 concerning Anti-Dumping Measures, Subsidy Measures, and Trade Security Measures Chapter I Article I paragraph 18, where the Applicant's production constitutes a large proportion of overall cotton yarn production in Indonesia so that it qualifies as an IDN in terms of Security Measures.

D. GOODS FOR WHICH PROTECTION IS REQUESTED

1. Description of Imported Goods Investigated

Based on BTKI 2022, *the Harmonized System* (HS) numbers and the description of the Items Investigated is as follows:

Table 3. Complete description of imported goods investigated

| No | HS Number | Description of goods | Description of Goods |
|----|------------------|---|---|
| | 52.04 | Cotton sewing thread, whether or not put up for retail sale. | Cotton sewing thread, whether or not put up for retail sale |
| | | - Not prepared for retail sale: | - <i>Not put up for retail sale</i> |
| 1 | 5204.11 | -- Contains 85% or more cotton by weight | <i>Containing 85% or more by weight of cotton:</i> |
| 2 | 5204.11.10 - - - | Unbleached | <i>Cotton sewing thread; not put up for retail sale; containing 85 % or more by weight of cotton; unbleached</i> |
| 3 | 5204.19.00 - - | Etc | <i>cotton sewing thread; not put up for retail sale; containing less than 85 % by weight of cotton</i> |
| 4 | 5204.20.00 - | Prepared for sale retail | <i>cotton sewing thread; put up for retail sale</i> |
| | 52.05 | Cotton thread (other than sewing thread), containing 85% or more cotton by weight, is not put up for retail sale. | Cotton yarn (other than sewing thread), containing 85 % or more by weight of cotton, not put up for retail sale. |
| | | - Single yarn, from uncombed fiber: | Single yarn, of uncombed fibers |
| 5 | 5205.11.00 - - | Measurement 714.29 decitex or more (not exceeding metric number 14) | <i>single yarn, of uncombed fibers; measuring 714.29 decitex or more (not exceeding 14 metric number)</i> |
| 6 | 5205.12.00 - - | Measurement less than 714.29 decitex but not less than 232.56 decitex (exceeding metric number 14 but not exceeding metric number 43) | <i>single yarn, of uncombed fibers; measuring less than 714.29 decitex but not less than 232.56 decitex (exceeding 14 metric number but not exceeding 43 metric number)</i> |

| No | HS Number | Description of goods | Description of Goods |
|----|----------------|---|---|
| | | - Single yarn, from combed fibers: | Single yarn, of combed fibers |
| 7 | 5205.21.00 - - | Measurement 714.29 decitex or more (not exceeding metric number 14) | single yarn, of combed fibers; measuring 714.29 decitex or more (not exceeding 14 metric number) |
| 8 | 5205.22.00 - - | Measurement less than 714.29 decitex but not less than 232.56 decitex (exceeding metric number 14 but not exceeding metric number 43) | single yarn, of combed fibers; measuring less than 714.29 decitex but not less than 232.56 decitex (exceeding 14 metric number but not exceeding 43 metric number) |
| 9 | 5205.24.00 - - | Measurement less than 192.31 decitex but not less than 125 decitex (exceeding metric number 52 but not exceeding metric number 80) | single yarn, of combed fibers; measuring less than 192.31 decitex but not less than 125 decitex (exceeding 52 metric number but not exceeding 80 metric number) |
| 10 | 5205.26.00 - - | Measurement less than 125 decitex but not less than 106.38 decitex (exceeding metric number 80 but not exceeding metric number 94) | single yarn, of combed fibers; measuring less than 125 decitex (exceeding 80 metric number) |
| | | - Double (folded) yarn or cable yarn, of uncombed fibers: | Multiple (folded) or cabled yarn, of uncombed fibers |
| 11 | 5205.32.00 - - | The size of each single thread is less than 714.29 decitex but not less than 232.56 decitex (exceeding metric number 14 but not exceeding metric number 43 per single thread) | multiple (folded)/ cabled yarn, of uncombed fibers; measuring per single yarn < 714.29 decitex but 232.56 decitex ÿ (exceeding 14 metric number but not exceeding 43 metric number per single yarn) |
| | | - Double (folded) yarn or cable yarn, from combed fibers: | Multiple (folded) or cabled yarn, of combed fibers |
| | 5205.41.00 - - | The size of each single thread is 714.29 decitex or more (not to exceed metric number 14 per single thread) | multiple (folded) or cabled yarn, of combed fibers; measuring per single 714.29 yarn decitex more (not |

| No | HS Number | Description of goods | Description of Goods |
|----|----------------|--|--|
| | | | <i>exceeding 14 metric numbers per single yarn)</i> |
| 12 | 5205.42.00 - - | The size of each single thread is less than 714.29 decitex but not less than 232.56 decitex (exceeding metric number 14 but not exceeding metric number 43 per single thread) | <i>multiple (folded) or cabled yarn, of combed fibers; measuring per single yarn < 714.29 decitex but > 232.56 decitex (exceeding 14 metric number but not exceeding 43 metric number per single yarn)</i> |
| 13 | 5205.43.00 - - | The size of each single thread is less than 232.56 decitex but not less than 192.31 decitex (exceeding metric number 43 but not exceeding metric number 52 each single thread) | <i>multiple (folded) or cabled yarn, of combed fibers; measuring per single yarn < 232.56 decitex but > 192.31 decitex (exceeding 43 metric number but not exceeding 52 metric number per single yarn)</i> |
| 14 | 5205.47.00 - - | The size of each single thread is less than 106.38 decitex but not less than 83.33 decitex (exceeding metric number 94 but not exceeding metric number 120 per single thread) | <i>multiple (folded) or cabled yarn, of combed fibers; measuring per single yarn < 106.38 decitex but > 83.33 decitex (> 94 metric number but > 120 metric number per single yarn)</i> |
| 15 | 5205.48.00 - - | The size of each single thread is less than 83.33 decitex (exceeds metric number 120 per single thread) | <i>multiple (folded) or cabled yarn, of combed fibers; measuring per single yarn less than 83.33 decitex (exceeding 120 metric number per single yarn)</i> |
| | 52.06 | Cotton thread (other than sewing thread), containing less than 85 % cotton by weight, is not put up for retail sale. | Cotton yarn (other than sewing thread), containing less than 85% by weight of cotton, not put up for retail sale. |
| | | Single yarn, of uncombed fiber: | Single yarn, of uncombed fibers |
| 16 | 5206.11.00 - - | Measurement 714.29 decitex or more (not exceeding metric number 14) | <i>single yarn, of uncombed fibers; measuring 714.29 decitex or more (not exceeding 14 metric number)</i> |

| No | HS Number | Description of goods | Description of Goods |
|----|----------------|---|---|
| 17 | 5206.12.00 - - | Measurement less than 714.29 decitex but not less than 232.56 decitex (exceeding metric number 14 but not exceeding metric number 43) | <i>single yarn, of uncombed fibers; measuring less than 714.29 decitex but not less than 232.56 decitex (exceeding 14 metric number but not exceeding 43 metric number)</i> |
| 18 | 5206.14.00 - - | Measurement less than 192.31 decitex but not less than 125 decitex (exceeding metric number 52 but not exceeding metric number 80) | <i>single yarn, of uncombed fibers; measuring less than 192.31 decitex but not less than 125 decitex (exceeding 52 metric number but not exceeding 80 metric number)</i> |
| | | - Single yarn, from combed fibers: | Single yarn, of combed fibers |
| 19 | 5206.21.00 - - | Measurement 714.29 decitex or more (not exceeding metric number 14) | <i>single yarn, of combed fibers; measuring 714.29 decitex or more (not exceeding 14 metric number)</i> |
| 20 | 5206.23.00 - - | Measurement less than 232.56 decitex but not less than 192.31 decitex (exceeding metric number 43 but not exceeding metric number 52) | <i>single yarn, of combed fibers; measuring less than 232.56 decitex but not less than 192.31 decitex (exceeding 43 metric number but not exceeding 52 metric number)</i> |
| 21 | 5206.24.00 - - | Measurement less than 192.31 decitex but not less than 125 decitex (exceeding metric number 52 but not exceeding metric number 80) | <i>single yarn, of combed fibers; measuring less than 192.31 decitex but not less than 125 decitex (exceeding 52 metric number but not exceeding 80 metric number)</i> |
| 22 | 5206.25.00 - - | Size less than 125 decitex (exceeds metric number 80) | <i>single yarn, of combed fibers; measuring less than 125 decitex (exceeding 80 metric numbers)</i> |
| | | - Double (folded) yarn or cable yarn, of uncombed fibers: | Multiple (folded) or cabled of yarns combed |

| No | HS Number | Description of goods | Description of Goods |
|------|---------------|--|--|
| 23 5 | 206.31.00 - - | The size of each single thread is 714.29 decitex or more (not to exceed metric number 14 per single thread) | <i>multiple or cabled (folded) or uncombed fibers; measuring per single yarn 714.29 decitex or more (not exceeding 14 metric number per single yarn)</i> |
| 24 5 | 206.32.00 - - | The size of each single thread is less than 714.29 decitex but not less than 232.56 decitex (exceeding metric number 14 but not exceeding metric number 43 per single thread) | <i>multiple (folded) or fibers; of cabled, uncombed measuring per single yarn < 714.29 decitex but > 232.56 decitex (exceeding 14 metric number but not exceeding 43 metric number per single yarn)</i> |
| 25 5 | 206.33.00 - - | The size of each single thread is less than 232.56 decitex but not less than 192.31 decitex (exceeding metric number 43 but not exceeding metric number 52 per single thread) | <i>multiple (folded) or cabled of yarn, uncombed fibers; measuring per single yarn < 232.56 decitex but 192.31 decitex (exceeding 43 > metric number but not exceeding 52 metric number per single yarn)</i> |
| | | Double (folded) yarn or cable yarn, from combed fibers: | Multiple (folded) or cabled yarn, of combed fibers |
| 26 5 | 206.42.00 - - | The size of each single thread is less than 714.29 decitex but not less than 232.56 decitex (exceeding metric number 14 but not exceeding metric number 43 each single thread) | <i>multiple (folded) or cabled yarn, of combed fibers; measuring per single yarn < 714.29 decitex but > 232.56 decitex (exceeding 14 metric number but not exceeding 43 metric number per single yarn)</i> |
| 27 5 | 206.45.00 - - | The size of each single thread is less than 125 decitex (exceeds metric number 80 per single thread) | <i>multiple (folded) or cabled yarn, of combed fibers; measuring per single yarn less than 125 decitex (exceeding 80 metric number per single yarn)</i> |

Source: BTKI 2022

2. Complete description of similar goods or direct goods

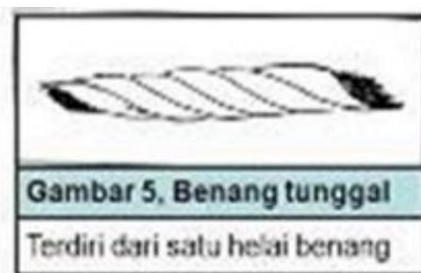
Compete with Researched Items

a. Physical Characteristics

Imported Goods:

Imported goods have the following physical characteristics:

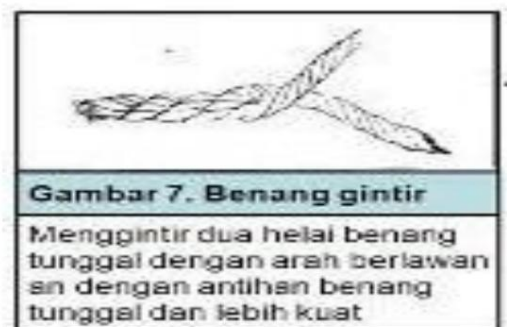
- 1) Cotton sewing thread is a double (folded) thread or thread cables of cotton fiber rolled on *reels* or *tubes* with weight not exceeding 1,000 grams, given *finishing treatment* for the purpose sewing and with a "Z" twist, consisting of:
 - a) Cotton sewing thread, not put up for retail sale.
 - b) Cotton sewing thread, prepared for retail sale (single, double (folded) thread or coiled cable thread winding tool).
- 2) Cotton thread (other than sewing thread), not prepared for sale retail, consisting of:
 - a) Single thread is a thread composed of one filament (monofilament), or two/more filament threads (multifilament), combined into one with a twist (*twisted*) or without twist (*untwisted*).



- b) Double (folded) thread is a thread formed from two or more single threads, including those obtained from monofilament (*twofold*, *threefold*, *fourfold*, etc.) twisted together (*twisted together*) in one twisting process. Nevertheless, monofilament threads are combined separately with twists (*twisted*) not included as thread double (folded).



- c) Cable thread is a thread formed from two threads or more, one of which is a double (folded) thread, twisted (*twisted*) together in one or more folds.



Applicant's Production Goods:

The Applicant's manufactured goods have the following physical characteristics:

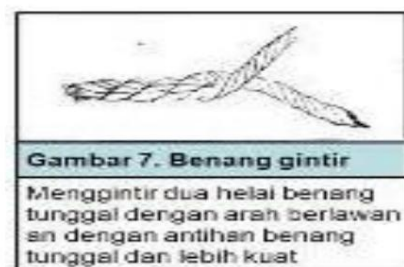
- 1) Cotton sewing thread is a double (folded) thread or thread cables of cotton fiber rolled on *reels* or *tubes* with weight not exceeding 1,000 grams, given finishing treatment for the purpose sewing and with a "Z" twist, consisting of:
 - a) Cotton sewing thread, not put up for retail sale.
 - b) Cotton sewing thread, prepared for retail sale (single, double (folded) thread or coiled cable thread winding tool).
- 2) Cotton thread (other than sewing thread), not prepared for sale retail, consisting of:
 - a) Single thread is a thread composed of one filament (monofilament), or two/more filament threads (multifilament), combined into one with a twist (*twisted*) or without twist (*untwisted*).



- b) Double (folded) thread is a thread formed from two or more single threads, including those obtained from monofilament (*twofold*, *threefold*, *fourfold*, etc.) twisted together (*twisted together*) in one twisting process. Nevertheless, monofilament threads are combined separately with twists (*twisted*) not included as thread double (folded).



- c) Cable thread is a thread formed from two threads or more, one of which is a double (folded) thread, twisted (*twisted*) together in one or more folds.



b. Technical specifications

Imported Goods:

The technical specifications of imported goods are as follows:

1) Cotton sewing thread:

a) Judging from the cotton content:

- Contains 85% or more cotton by weight

- Contains less than 85% cotton by weight
 - b) Judging from the process, unbleached sewing thread is sewing thread that has the natural color of the fibers that form it, has not been bleached, dyed or printed.
- 2) Cotton thread (other than sewing thread) in terms of cotton content:
- a) Contains 85% or more cotton by weight
 - b) Contains less than 85% cotton by weight

Applicant's Production Goods:

The technical specifications of the Applicant's production goods are:

- 1) Cotton sewing thread:
- a) Judging from the cotton content:
 - Contains 85% or more cotton by weight
 - Contains less than 85% cotton by weight
 - b) Judging from the process, unbleached sewing thread is sewing thread that has the natural color of the fibers that form it, has not been bleached, dyed or printed.
- 2) Cotton thread (other than sewing thread) in terms of cotton content:
- a) Contains 85% or more cotton by weight
 - b) Contains less than 85% cotton by weight

c. Raw material

Imported Goods:

The raw materials for imported goods are as follows:

- 1) The raw material for cotton sewing thread is single thread cotton, including those obtained from monofilament (*twofold yarn, threefold, fourfold, etc.*) and given *finishing treatment*.
- 2) Raw materials for cotton thread (other than sewing thread) are:
- a) Uncombed fiber (*carded*): the main purpose of *carding* is separate the cotton fibers, laying the fibers more or less parallel, and clean the fiber from ingredients other than cotton fiber for most or all of the fiber.
 - b) Combed fiber *is* the process of cleaning unfinished fibers combed from the remaining content outside the fibers and removed short fibers, so that only the long fibers remain of the fiber

cotton wool placed parallel.

Applicant's Production Goods:

The Applicant's Production Goods have the same raw materials as imported goods, namely:

- 1) The raw material for cotton sewing thread is single thread cotton, including those obtained from monofilament (twofold *yarn*, *threefold*, *fourfold*, etc.) and given *finishing treatment*.
- 2) Raw materials for cotton thread (other than sewing thread) are:
 - a) Uncombed fiber (*carded*): the main purpose of *carding* is separate the cotton fibers, laying the fibers more or less parallel, and clean the fiber from ingredients other than cotton fiber for most or all of the fiber.
 - b) Combed fiber *is* the process of cleaning unfinished fibers combed from the remaining content outside the fibers and removed short fibers, so that only the long fibers remain of the fiber cotton wool placed parallel.

d. Utility

Imported Goods:

The uses of imported goods are as follows:

- 1) Cotton sewing thread is for sewing.
- 2) cotton thread (other than sewing thread) is thread made from cotton not intended for sewing, but rather for weaving or knitting into cloth.

Applicant's Production Goods:

The Applicant's Production Goods have the same use as goods import, namely:

- 1) The use of cotton sewing thread is for sewing.
- 2) the use of cotton thread (other than sewing thread) is for weaving or knitted into cloth.

3. Statement of Similar Goods or Goods that Directly Compete

Based on the explanation provided in letter ad above, the Petitioner believes that the goods produced by the Applicant are **similar goods**

with imported goods, seen from **physical characteristics, technical specifications, raw materials, and uses.**

E. INFORMATION ON THE SURGE IN THE NUMBER OF IMPORTED GOODS

1. Number of Imports

Table 4. Absolute and Relative Import Amounts

| Description | Unit | Year | | | | Change (%) | | | Trends 2019-2022 (%) |
|---|-------|--------|--------|--------|--------|------------|-----------|-----------|----------------------|
| | | 2019 | 2020 | 2021 | 2022 | 2019-2020 | 2020-2021 | 2021-2022 | |
| Import Amount | Tons | 14,843 | 12,588 | 20,873 | 29,908 | (15.19) | 65.82 | 43.28 | 29.79 |
| National Production | Index | 100 | 66.40 | 82.65 | 72.55 | (33.60) | 24.46 | (12.22) | (7.17) |
| Relative Import Against Production National | Index | 100 | 127.71 | 170.15 | 277.73 | 27.71 | 33.23 | 63.23 | 39.81 |

Source: Central Statistics Agency (BPS), Applicant, processed

As can be seen in Table 4 above, the absolute amount of imports experienced a spike with a trend of 29.79% during the 2019-2022 period.

In 2020 the number of imports decreased to

12,588 tons from the previous 14,843 tons in 2019 or down

amounting to 15.19%. In 2021 the number of imports will increase

to 20,873 tons from the previous 12,588 tons in 2018

2020, or up 65.82%. In 2022 the number of imports will increase

an increase to 29,908 tons from the previous 20,873 tons

in 2021, or an increase of 43.28%.

The relative amount of imports experienced a surge with a trend of 39.81%

during the 2019-2022 period. In 2020 the number of imports experienced

an increase of 127.71 index points from the previous amount

100 index points in 2019 or an increase of 27.71%. In the year of

In 2021, the number of imports will increase to 170.15 points

index from the previous 127.71 index points in 2020, or

up 33.23%. In 2022 the number of imports will increase to

amounting to 277.73 index points from the previous 170.15 index points in

In 2021, or an increase of 63.23%.

2. Import Share

Table 5. Share of Import Origin Countries

| Country | Year | | | | | | | | | | | | |
|-----------------|---------------------|----------------|---------------------|---------------|---------------------|---------------|---------------------|---------------|------------|--------|-------|-------|------------|
| | 2019 | | 2020 | | 2021 | | 2022 | | | | | | |
| | Volume Share (Tons) | (%) | Volume Share (Tons) | (%) | Volume Share (Tons) | (%) | Volume Share (Tons) | (%) | | | | | |
| Vietnam | 5,307 | 35.75 | 5,633 | 3,670 | 29.15 | 4,554 | 9,574 | 45.87 | 5,569 | 13,652 | 45.65 | | |
| PRC | 37.95 | 1,628 | 10.97 | 36.18 | 1,736 | 13.79 | 26.68 | 1,887 | 9.04 | 8,314 | 27.80 | | |
| India | 0.04 | 0.00 | 628 | 4.23 | 623 | 4.95 | 334 | 2.65 | 414 | 1.99 | 1,167 | 5.58 | |
| | 521 | 3.51 | 1,126 | 7.58 | 577 | 4.58 | 1,095 | 8.7 | 627 | 3.00 | 1,636 | 2,201 | 7.36 |
| Türkiye | | | | | | | 7.84 | | | | | 1,165 | 3.89 |
| Pakistan | | | | | | | | | | | | 1,056 | 3.53 |
| Thailand | | | | | | | | | | | | 1,069 | 3.57 |
| Other Countries | | | | | | | | | | | | | |
| Total | 14,843 | Source: | 100 | 12,588 | 100 | 20,873 | 100 | 29,908 | 100 | | | | 100 |

BPS, processed

Based on table 5 above, in 2022 the market share of product imports

Cotton yarn in the domestic market is dominated by Vietnam with market share

imports amounted to 45.65%, followed by China with an import market share of

27.80%, India with an import market share of 8.20%, Turkey with a share

import market of 7.36%, Pakistan with an import market share of 3.89%,

Thailand with an import market share of 3.53%, and other countries < 3%

namely 3.57%.

F. INFORMATION ON THE APPLICANT'S LOSSES

Table 6. Applicant Performance Indicators

| No | Description | Unit | Year | | | | Growth (%) | | | Trends 2019- 2022 (%) |
|----|---------------|-------|------|--------|--------|--------|------------|--------|---------|--------------------------------|
| | | | 2019 | 2020 | 2021 | 2022 | 19-20 | 20-21 | 21-22 | |
| 1 | Production | Index | 100 | 85.98 | 90.78 | 78.41 | (14.02) | 5.59 | (13.63) | (6.53) |
| 2 | Sale Domestic | Index | 100 | 85.44 | 99.23 | 79.19 | (14.56) | 16.13 | (20.19) | (5.36) |
| 3 | Productivity | Index | 100 | 107.85 | 110.95 | 109.02 | 7.85 | 2.87 | (1.74) | 2.91 |
| 4 | Used Capacity | Index | 100 | 86.23 | 91.05 | 78.64 | (13.77) | 5.59 | (13.63) | (6.45) |
| 5 | Profit / Loss | Index | 100 | 7.83 | 38.45 | 8.01 | (92.17) | 391.11 | (79.17) | (45.02) |
| 6 | Labor | Index | 100 | 79.72 | 81.83 | 71.92 | (20.28) | 2.65 | (12.11) | (9.18) |

Source: Applicant, processed

a. Production

During the 2019-2022 period, the Applicant's production decreased with a trend of 6.53%. In 2019, the Applicant's production was 100 index points, decreasing to 85.98 index points or 14.02% in 2020. Furthermore, in 2021, the Applicant's production increased by 5.59%, then in 2022 the Applicant's production again decreased by 78.41 index points or 13.63% when compared to the year previously. The decline in production occurred due to a decrease in demand for the products produced because imported goods flooded the domestic market.

b. Domestic sales

Domestic sales during the 2019-2022 period experienced a decline with a trend of 5.36%. In 2019 domestic sales were 100 index points, decreasing to 85.44 index points or 14.56% in 2020. In 2021 domestic sales increased by 16.13%, then in 2022 domestic sales decreased again amounted to 79.19 index points or 20.19% compared to the previous year.

This is caused by the flood of imported goods which dominate the domestic market.

c. Productivity

In 2019, productivity was 100 index points, increasing to 107.85 index points or 7.85% in 2020. Furthermore, in 2021, productivity increased to 110.95 index points or 2.87% Meanwhile, in 2022 productivity will experience a slight decline to 109.02 index points. During the 2019-2022 period, productivity increased with a trend of 2.91% due to a large reduction in the number of workers.

d. Used Capacity

During the 2019-2022 period, the Applicant's used capacity decreased with a trend of 6.45% due to a surge in imports during that period. The largest decrease in used capacity occurred in 2020 amounting to 13.77% when compared to 2019.

Furthermore, in 2021, used capacity increased by 5.59%, while in 2022 used capacity decreased by 13.63%.

e. Advantages/Disadvantages

The applicant experienced a decline in profits with a trend of 45.02% during the 2019-2022 period. In 2019, the Applicant's profit was 100 index points and then in 2020 the Applicant experienced a decrease in profits of 92.17%, where in the same year domestic sales decreased and the number of imports of these products increased. In 2021 the Applicant experienced an increase in profits of 38.45 index points and was still below the previous year. Meanwhile, in 2022, the Petitioner will again experience a decrease in profits of 79.17%.

f. Labor

There has been a reduction in the number of workers with a trend of 9.18% during the 2019-2022 period. In 2019 the number of workers was 100 index points, decreasing to 79.72 index points or 20.28% in 2020. Then in 2021 the number of workers increased to 81.83 index points and in 2022 the number of workers decreased again to 71.92 index points.

G. Market Share**Table 7. National Installed Capacity, National Consumption and Market Share**

| No. | Indicator | Unit | 2019 | 2020 | 2021 | 2022 | Change (%) | | | Trends 2019-2022 (%) |
|-----|------------------------------|-------|--------|--------|--------|--------|------------|-----------|-----------|----------------------|
| | | | | | | | 2019-2020 | 2020-2021 | 2021-2022 | |
| 1 | National Consumption | Index | 100 | 85.80 | 99.36 | 85.14 | (14.20) | 15.80 | (14.31) | (3.30) |
| 2 | Domestic Sales Applicant | Index | 100 | 85.44 | 99.23 | 79.19 | (14.56) | 16.13 | (20.19) | (5.36) |
| 3 | Domestic Sales Non Applicant | Index | 100 | 86.69 | 89.31 | 66.59 | (13.31) | 3.03 | (25.45) | (11.22) |
| 4 | Number of Imports | Tons | 14,843 | 12,588 | 20,873 | 29,908 | (15.19) | 65.82 | 43.28 | 29.79 |
| 5 | Market share Applicant | Index | 100 | 99.58 | 99.86 | 93.01 | (0.42) | 0.29 | (6.87) | (2.12) |
| 6 | Non Market Share Applicant | Index | 100 | 101.03 | 89.89 | 78.21 | 1.03 | (11.03) | (12.99) | (8.19) |
| 7 | Import Market Share Index | 100 | | 98.84 | 141.53 | 236.65 | (1.16) | 43.19 | 67.21 | 34.22 |

Source: Applicant, IDN and BPS, processed

The market share of applicants and non-applicants during 2019-2022 continues decreased with a trend of 2.12% and 8.19%. On the contrary
The import market share during 2019-2022 increased with the trend amounting to 34.22%. Thus, during 2019-2022 market share
Imports have taken over the market share of applicants and non-applicants.

H. UNEXPECTED DEVELOPMENT (*Unforeseen Development*)

1. Vietnam

There has been no increase in the number of cotton yarn imports from Vietnam can be predicted beforehand (*unforeseeable/unexpected*), this is because there has been a significant increase in investment and expansion in yarn industry in Vietnam since 2019. Additional investment namely the increase in spindle installation which increased by 250,000 points spindles in 2021 compared to 2020 with a capacity of 2,600,000 Tons and will continue to increase in 2022 by 100,000 spindles compared to 2021 with a capacity of 2,700,000 tons, as can be seen in the following table:

Table 8. Investment and Additional Fixed Assets in the Cotton Yarn Industry in Vietnam

| Description | Unit | 2019 | 2020 | 2021 | 2022 |
|---------------------------------|-------|-----------|-----------|-----------|-----------|
| Number of spindles | (000) | 8,250 | 8,250 | 8,500 | 8,600 |
| Number of Rotors | (000) | 138 | 138 | 138 | 138 |
| Cotton yarn production capacity | Tons | 2,500,000 | 2,500,000 | 2,600,000 | 2,700,000 |
| Cotton thread production | Tons | 2,500,000 | 2,500,000 | 2,600,000 | 2,700,000 |

Source: *Vietnam Customs, Trade Association and Post's estimate*

Based on Table 8 above, it can be seen that investment in the Vietnamese textile industry sector increases every year during the 2019-2022 period, which causes an increase in the addition of new fixed assets and production capacity in the same period. Apart from increasing production capacity, Vietnam also produces *full capacity* in the entire spinning industry as a result of increasing investment and fixed assets in the spinning industry sector in Vietnam. This was an unexpected condition *which* indirectly caused an increase in exports of cotton yarn products from Vietnam to other countries, including Indonesia.

2. China

1. Diversion of export destinations from China to Indonesia due to the import ban policy in the United States

On June 21 2022, the United States issued a policy to prohibit imports from China, especially from the country of Xinjiang (the region in China that produces the largest cotton and its derivative products) if these products are made

by Uyghur workers in Xinjiang, China. These regulations are regulated in *section 2 of public law no. 117-78, An Act to ensure that goods made with forced labor in the Xinjiang Uyghur Autonomous Region of the People's Republic of China do not enter the United States America, and for other purposes (the Uyghur Forced Labor Prevention Act)*. With the enactment of this regulation, imports of cotton yarn products from China in the United States experienced a drastic decline, so that China shifted the destination of cotton yarn exports to other countries, one of which was Indonesia, causing a surge in imports, as can be seen in the table below.

Table 1. Cotton yarn export data from China

| Description | Unit | Year | | | | Change (%) | Trends 19-22 (%) |
|---------------------------------|------|-------|-------|-------|-------|------------|------------------|
| | | 2019 | 2020 | 2021 | 2022 | 21-22 | |
| American import States of China | Tons | 391 | 386 | 381 | 267 | (29.92) | (10.93) |
| Indonesian imports from China | Tons | 5,633 | 4,554 | 5,569 | 8,313 | 49.29 | 14.67 |

Source: Trade map

Based on table 10 above, the existence of regulations prohibiting imports of cotton products and their derivatives in the United States from China has resulted in a drastic decline in imports in 2022 to only 267 tonnes, whereas in trend there has been a decline of 10.93% during 2019-2022. Furthermore, the transfer of exports from previously to the United States to Indonesia resulted in a significant surge in imports in Indonesia in 2022 compared to 2021, namely 49.29% and an increasing trend of 14.67%.

The provision of subsidies for exports of Chinese cotton yarn products and the transfer of export destinations from China to the United States to Indonesia are unexpected conditions (*unforeseen development*) which have caused a surge in imports of cotton yarn products in Indonesia.

I. WILLINGNESS TO COOPERATE

The applicant is willing to cooperate fully throughout the investigation process in the context of the imposition of Trade Security Measures (*Safeguards*) against the surge in the number of imports of Cotton Yarn goods.

Jakarta, 16 September 2023



ASOSIASI PERTEKSTILAN INDONESIA
INDONESIAN TEXTILE ASSOCIATION

Jemmy Kartiwa
Chairman

ANNEX 1:

IMPORTER'S NAME AND ADDRESS

| NO | COMPANY NAME | ADDRESS |
|-----------|---|---|
| 1 | PT. Primarindo Asia Infrastructure | Jl. Tanjung Karang 3-4A Jakarta |
| 2 | PT. Amefird Indonesia Yarn 3 PT. | Jl. Cisirung No. 105 Canguang Wetan, Bandung |
| | SuryaThanks to Indonesia | Jl. Delanggu Polanharjo Km. 2.6 Klaten, Central Java |
| 4 | PT. Greentex Indonesia Utama II | Jl. Raya Banjaran Barat Km. 16.5 Batukarut, Bandung |
| 5 | PT. Mega Foamworks Indonesia 6 PT. | GIIC Block area. CF Cikarang Pusat, Bekasi |
| | Ihchi Textile Mills & Machinery 7 PT. | Jl. Cibaligo No. 149A Cimahi, Bandung |
| | Winnersumbiri Knitting Factory 8 PT. Kurabo | Jl. KH. Agus Salim No. 18 Cipondoh, Tangerang |
| | Manunggal Textile Industries | Cakrawala Tower Fl. 7 Jl. MH Thamrin 9 Jakarta |
| 9 | PT. Triputra Textile Industry | Jl. Raya Laswi No. 8 Majalaya Bandung |
| 10 | PT. Textile One Indonesia | Gintungtengah Klari Hamlet, Karawang, West Java |
| 11 | PT. Wintai Garment | Jl. Tanah Abang IV No. 31 South Petojo |
| 12 | PT. Ocean Asia Industry | Jl. Raya Serang Km. 62 No. 178 Cikande, Serang Banten |
| 13 | PT. Jiale Indonesia Textile | Jl. Pecangaan Bate No. 288 Etc. Gemulung, Jepara |
| 14 | PT. Sejahtera Bintang Abadi Textile Tbk | Jl. Raya Cicalengka Majalaya Km.5 Bandung |
| 15 | PT. Soljer Abadi 16 | Jl. Raya Rancaekek Majalaya Bandung |
| | PT. Indo Taichen Textile Industry | Jl. Gatot Subroto Km. 3 Jatiuwung Tangerang |
| 17 | PT. Perdana Firsta Garment | Jl. Raya Batujajar Km. 1,2 Padalarang Bandung |
| 18 | PT. PAN Pacific Jakarta | Jl. Kalimantan Block D-27 Cilincing Jakarta |
| 19 | PT. Micro Garments | Jl. Raya Rancaekek Majalaya Bandung |
| 20 | PT. Multindo Velvet Industries | Wahyu Sejahtera Industrial Area Block E Bogor |

NAME AND ADDRESS OF IMPORTER ASSOCIATION

| NO | ASSOCIATION | ADDRESS |
|-----------|---|--|
| 1 | GENSI (National Importers Association Throughout Indonesia) | Jl. Raya Kelapa Nias No.27, RT.1/RW.12, Pegangsaan Dua, Kec. Cpl. Gading, North Jkt City, Special Capital Region of Jakarta 14240, Indonesia |

APPENDIX 2

NAME AND ADDRESS OF THE EXPORTER/SUPPLIER FROM THE EXPORTING COUNTRY

| NO | COMPANY NAME | ADDRESS |
|-----------|--|--|
| 1 | Huafang Group of China | VGCX+V74, Chengbei Rd, Zhangjiagang, Suzhou, Jiangsu, China, 215638 |
| 2 | Weiqiao Textile Company Limited | No. 1, Wei Fang Road, Economic Development Zone, Zouping County, Shandong Province |
| 3 | Shijiazhuang Changshan Textile Co., Ltd. | 183 Heping E Rd, Chang'An, Shijiazhuang, Hebei, China, 050010 |
| 4 | Lu Thai Textile Co. Ltd. | no 81 Songling East Rd, Zibo, Shandong, 255100, China |