

## 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1120000557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1120000557\_Attach1.pdf、印尼經1120000557\_Attach2.pdf、印尼經1120000557\_Attach3.pdf、印尼經1120000557\_Attach4.pdf）

主旨：有關印尼頃對進口平織棉布(Woven Fabrics from Cotton)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5家廠商提出申請，涉案品項共33項。出口廠商名單未列入

電文  
文  
騎縫

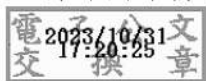
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我國業者(主為中國及韓國業者)，2020至2022年我國未列  
主要進口來源。

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：



裝

訂

線





### KPPI Mulai Penyelidikan Safeguard Measures Lonjakan Impor Kain Tenunan dari Kapas

**Jakarta, 27 Oktober 2023** – Komite Pengamanan Perdagangan Indonesia (KPPI) memulai Penyelidikan Tindakan Pengamanan Perdagangan (*Safeguard Measures*) atas lonjakan jumlah impor barang kain tenunan dari kapas mulai Jumat, (27/10). Impor kain tenunan dari kapas tersebut mencakup 33 nomor *Harmonized System* (HS) 8 digit yaitu HS. 5208.21.00, 5208.22.00, 5208.31.90, 5208.33.00, 5208.41.90, 5208.42.10, 5208.42.90, 5208.43.00, 5208.52.10, 5208.59.20, 5208.59.90, 5209.11.10, 5209.11.90, 5209.19.00, 5209.21.00, 5209.31.00, 5209.49.00, 5209.51.10, 5210.21.00, 5210.32.00, 5210.41.10, 5210.49.00, 5210.51.10, 5210.59.10, 5210.59.90, 5211.31.00, 5211.32.00, 5211.39.00, 5211.59.10, 5211.59.90, 5212.15.90, 5212.21.00, dan 5212.23.00 berdasarkan Buku Tarif Kepabeanan Indonesia (BTKI) tahun 2022.

Penyelidikan tersebut didasarkan pada permohonan Asosiasi Pertekstilan Indonesia (API) pada 18 September 2023 lalu yang mewakili industri dalam negeri penghasil kain tenunan dari kapas.

*“Dari bukti awal permohonan yang diajukan oleh API, KPPI menemukan adanya lonjakan jumlah impor barang kain tenunan dari kapas. KPPI juga menemukan indikasi awal mengenai kerugian serius atau ancaman kerugian serius yang dialami industri dalam negeri sebagai akibat dari lonjakan jumlah impor barang kain tenunan dari kapas,”* ungkap Plt. Ketua KPPI Nugraheni Prasetya Hastuti.

Menurut Nugraheni, kerugian serius atau ancaman kerugian serius tersebut terlihat dari sejumlah indikator kinerja industri dalam negeri pada periode 2019—2022. *“Indikator-indikator tersebut yaitu menurunnya volume produksi, penjualan domestik, kapasitas terpakai, keuntungan; menurunnya jumlah tenaga kerja; meningkatnya persediaan; serta menurunnya pangsa pasar API di pasar domestik,”* jelas Nugraheni.

Berdasarkan data dari Badan Pusat Statistik (BPS), dalam tiga tahun terakhir (2020—2022), terjadi peningkatan jumlah impor barang kain tenunan dari kapas dengan tren sebesar 38,21 persen. Pada 2020, jumlah impor produk tersebut sebesar 21.976 ton. Pada 2021 impornya meningkat 80,55 persen menjadi sebesar 39.678 ton. Selanjutnya, pada 2022 impornya naik 5,80 persen menjadi 41.978 ton.

Asal impor barang kain tenunan dari kapas yaitu dari Republik Rakyat Tiongkok (RRT) sebesar 80,08 persen, Hong Kong (4,91 persen), Vietnam (4,35 persen), dan negara lainnya (10,66 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 1 Lantai 5  
Jakarta 10110  
Telp/Fax (021) 3857758  
E-mail: [kppi@kemendag.go.id](mailto:kppi@kemendag.go.id)

--selesai--

**Informasi lebih lanjut hubungi:**

**M. Rivai Abbas**  
**Plt. Kepala Biro Hubungan Masyarakat**  
**Kementerian Perdagangan**  
Email: [pusathumas@kemendag.go.id](mailto:pusathumas@kemendag.go.id)

**Komite Pengamanan Perdagangan Indonesia**  
Email: [kppi@kemendag.go.id](mailto:kppi@kemendag.go.id)

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

**5208.21.00, 5208.22.00, 5208.31.90, 5208.33.00,  
5208.41.90, 5208.42.10, 5208.42.90, 5208.43.00,  
5208.52.10, 5208.59.20, 5208.59.90, 5209.11.10,  
5209.11.90, 5209.19.00, 5209.21.00, 5209.31.00,  
5209.49.00, 5209.51.10, 5210.21.00, 5210.32.00,  
5210.41.10, 5210.49.00, 5210.51.10, 5210.59.10,  
5210.59.90, 5211.31.00, 5211.32.00, 5211.39.00,  
5211.59.10, 5211.59.90, 5212.15.90, 5212.21.00,  
dan 5212.23.00**

**TIDAK RAHASIA**

**DISAMPAIKAN OLEH  
ASOSIASI PERTEKSTILAN INDONESIA  
TAHUN 2023**

## A. UMUM

Asosiasi Pertekstilan Indonesia (API) yang selanjutnya disebut Pemohon mewakili sebanyak 5 (lima) perusahaan Industri Kain Tenunan dari Kapas, dengan ini mengajukan permohonan kepada Komite Pengamanan Perdagangan Indonesia (KPPI) untuk melakukan penyelidikan dalam rangka Tindakan Pengamanan Perdagangan (*Safeguards*) terhadap impor barang Kain Tenunan dari Kapas yang mengakibatkan kerugian serius atau ancaman kerugian serius.

Permohonan kami didasari oleh terjadinya lonjakan volume impor barang Kain Tenunan dari Kapas dengan nomor pos tarif (*Harmonized System*): HS. 5208.21.00, 5208.22.00, 5208.31.90, 5208.33.00, 5208.41.90, 5208.42.10, 5208.42.90, 5208.43.00, 5208.52.10, 5208.59.20, 5208.59.90, 5209.11.10, 5209.11.90, 5209.19.00, 5209.21.00, 5209.31.00, 5209.49.00, 5209.51.10, 5210.21.00, 5210.32.00, 5210.41.10, 5210.49.00, 5210.51.10, 5210.59.10, 5210.59.90, 5211.31.00, 5211.32.00, 5211.39.00, 5211.59.10, 5211.59.90, 5212.15.90, 5212.21.00, dan 5212.23.00, 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**

<b>Nama Perusahaan</b>	<b>Alamat</b>	<b>Telepon &amp; Email</b>
1. PT. Delta Merlin Sandang Tekstil	Jl. Raya Timur, Kenatan, Bumiaji, Kec. Sragen, Kabupaten Sragen, Jawa Tengah 57254 (KM 10)	(0271) 887008 duniatex@gmail.com
2. 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
3. PT. Delta Dunia Tekstil	Jl. Maospati - Solo, Gerdu, Jetis, Kec. Jaten, Kabupaten Karanganyar, Jawa Tengah 57731	(0271) 622878 personaliaddtpondok@gmail.com
4. 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
5. PT. Delta Merlin Dunia Tekstil	Pd. III, Pondok, Kec. Grogol, Kabupaten Sukoharjo, Jawa Tengah 57552, Indonesia	(0271) 653113 personaliadmdt5@gmail.com
6. PT. DamaiteX	Jl. Simongan No.100, Ngemplak Simongan, Kec. Semarang Barat, Kota Semarang, Jawa Tengah 50148	(024) 7605804 ptdamirex_smg@yahoo.co.id
7. PT. Djohartex	Jl. Raya Magelang - Purworejo, Km 9, Kabupaten Magelang	(0293)-362729 djohartex@gmail.com
8. PT. Kosoema Nanda Putra	Jl. Karangdowo KM. 3, Jatimulyo, Pedan, Klaten 57468	(0272) 897318 info@kosoemanandaputra.co.id
9. PT. Sari Warna Asli	Jl. Hos Cokroaminoto no. 28 Pucang Sawit, Surakarta, Jawa Tengah. Indonesia 57125	+62 271 648747 publikasi.swag@gmail.com
10. PT. Sri Rejeki Isman	Jl. KH. Samanhudi 88, Jetis, Sukoharjo, Solo – Central Java, Indonesia	(62-71) 593188 hrd@sritex.co.id

Sumber: Pemohon, diolah

## C. ROPORSI PRODUKSI PEMOHON

**Tabel 2. Jumlah Produksi dan Proporsi Produksi Tahun 2022**

Uraian	Proporsi (%)
Produksi Pemohon	56,13
Produksi Non Pemohon	43,87
<b>Produksi Nasional</b>	<b>100</b>

Sumber: IDN dan Pemohon, diolah

Total produksi Pemohon pada Tahun 2022 adalah 56,13% 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 Kain Tenunan dari Kapas di Indonesia, sehingga memenuhi syarat sebagai IDN dalam hal Tindakan Pengamanan.

## D. BARANG YANG DIMINTAKAN PERLINDUNGAN

### 1. Uraian Barang

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

**Tabel 3. Uraian Barang yang Dimintakan Perlindungan**

No	Nomor HS	Uraian Barang	Description of Goods
		Kain tenunan dari kapas, mengandung kapas 85 % atau lebih menurut beratnya, beratnya tidak lebih dari 200 g/m <sup>2</sup> .	Woven fabrics of cotton, containing 85 % or more by weight of cotton, weighing not more than 200 g/m <sup>2</sup> .
		- <b>Dikelantang :</b>	<b>bleached</b>
1.	5208.21.00	-- Tenunan polos, beratnya tidak lebih dari 100 g/m <sup>2</sup>	<i>plain weave, weighing not more than 100 g/m<sup>2</sup>; bleached; containing 85 % or more by weight of cotton</i>
2.	5208.22.00	-- Tenunan polos, beratnya lebih dari 100 g/m <sup>2</sup>	<i>plain weave, weighing more than 100 g/m<sup>2</sup>; bleached; containing 85 % or more by weight of cotton</i>
		- <b>Dicelup :</b>	<b>Dyed</b>
		-- Tenunan polos, beratnya tidak lebih dari 100 g/m <sup>2</sup> :	<i>Plain weave, weighing not more than 100 g/m<sup>2</sup></i>
3.	5208.31.90	--- Lain-lain	<i>other than voile; plain weave, weighing not more than 100 g/m<sup>2</sup>; dyed; containing 85 % or more by weight of cotton</i>
4.	5208.33.00	-- Kepar 3-benang atau 4-benang, termasuk kepar silang	<i>3-thread or 4-thread twill, including cross twill; dyed; containing 85 % or more by weight of cotton</i>
		- <b>Dari benang aneka warna :</b>	<b>Of yarns of different colours</b>



No	Nomor HS	Uraian Barang	Description of Goods
		-- Tenunan polos, beratnya <b>tidak</b> lebih dari 100 g/m <sup>2</sup> :	<i>Plain weave, weighing more than 100 g/m<sup>2</sup></i>
5.	5208.41.90	--- Lain-lain	<i>other than ikat fabric; plain weave, weighing not more than 100 g/m<sup>2</sup>; of yarn of different colour; containing 85 % or more by weight of cotton</i>
	5208.42	-- Tenunan polos, beratnya lebih dari 100 g/m <sup>2</sup> :	<i>Plain weave, weighing not more than 100 g/m<sup>2</sup></i>
6.	5208.42.10	--- Tenun ikat	<i>ikat fabric; plain weave, weighing more than 100 g/m<sup>2</sup>; of yarn of different colour; containing 85 % or more by weight of cotton</i>
7.	5208.42.90	--- Lain-lain	<i>other than ikat fabric; plain weave, weighing more than 100 g/m<sup>2</sup>; of yarn of different colour; containing 85 % or more by weight of cotton</i>
8.	5208.43.00	-- Kepar 3-benang atau 4-benang, termasuk kepar silang	<i>3-thread or 4-thread twill, including cross twill; plain weave, weighing more than 100 g/m<sup>2</sup>; of yarn of different colour; containing 85 % or more by weight of cotton</i>
		- <b>Dicetak :</b>	<b>Printed</b>
		-- Tenunan polos, beratnya lebih dari 100 g/m <sup>2</sup> :	<i>Plain weave, weighing not more than 100 g/m<sup>2</sup></i>
9.	5208.52.10	--- Dicetak dengan proses batik tradisional	<i>plain weave, weighing more than 100g/m<sup>2</sup>; printed by the traditional batik process; containing 85 % or more by weight of cotton</i>
	5208.59	-- Kain lainnya :	<i>Other</i>
10.	5208.59.20	--- Lain-lain, kepar 3-benang atau 4-benang, termasuk kepar silang	<i>woven fabrics; other than plain weave; printed; 3-thread or 4-thread twill, including cross twill; containing 85 % or more by weight of cotton, weighing not more than 200 g/m<sup>2</sup></i>
11.	5208.59.90	--- Lain-lain	<i>woven fabrics; oth than plain weave; printed by oth than traditional batik process; oth than 3-thread or 4-thread twill, including cross twill; containing ≥85% by weight of cotton, weighing &lt; 200 g/m<sup>2</sup></i>
		<b>Kain tenunan dari kapas, mengandung kapas 85 % atau lebih menurut beratnya, beratnya lebih dari 200 g/m<sup>2</sup>.</b>	<b>Woven fabrics of cotton, containing 85 % or more by weight of cotton, weighing more than 200 g/m<sup>2</sup></b>
		- <b>Tidak dikelantang :</b>	<b>Unbleached</b>
		-- Tenunan polos :	<i>Plain weave</i>
12.	5209.11.10	--- Duck dan kanvas	<i>duck and canvas; plain weave; unbleached; woven fabrics of cotton, containing ≥ 85 % by weight of cotton, weighing &gt; 200 g/m<sup>2</sup></i>
13.	5209.11.90	--- Lain-lain	<i>other than duck and canvas; plain weave; unbleached; woven fabrics of cotton, containing ≥ 85 % by weight of cotton, weighing &gt; 200 g/m<sup>2</sup></i>
14.	5209.19.00	-- Kain lainnya	<i>woven fabrics of cotton, containing</i>

No	Nomor HS	Uraian Barang	Description of Goods
			≥ 85 % by weight of cotton, weighing > 200 g/m <sup>2</sup> ; unbleached; other than plain weave; other than 3-thread or 4-thread twill, including cross twill
		- <b>Dikelantang :</b>	<b>Bleached</b>
15.	5209.21.00	-- Tenunan polos	woven fabrics of cotton, containing ≥ 85 % by weight of cotton, weighing > 200 g/m <sup>2</sup> ; unbleached; other than plain weave; other than 3-thread or 4-thread twill, including cross twill
		- <b>Dicelup :</b>	<b>Dyed</b>
16.	5209.31.00	-- Tenunan polos	plain weave; dyed; woven fabrics of cotton, containing ≥ 85 % by weight of cotton, weighing > 200 g/m <sup>2</sup>
		- <b>Dari benang aneka warna :</b>	<b>Of yarns of different colours</b>
17.	5209.49.00	-- Kain lainnya	woven fabrics of cotton, containing ≥ 85 % by weight of cotton, weighing > 200 g/m <sup>2</sup> ; of yarns of different colours; other than those of subheading 520941-520943
		- <b>Dicetak :</b>	<b>Printed</b>
		-- Tenunan polos :	Plain weave
18.	5209.51.10	--- Dicetak dengan proses batik tradisional	plain weave; printed by the traditional batik process; woven fabrics of cotton, containing ≥ 85 % by weight of cotton, weighing > 200 g/m <sup>2</sup>
		Kain tenunan dari kapas, mengandung kapas kurang dari 85 % menurut beratnya, dicampur terutama atau semata-mata dengan serat buatan, beratnya tidak lebih dari 200 g/m <sup>2</sup> .	<b>Woven fabrics of cotton, containing less than 85 % by weight of cotton, mixed mainly or solely with man-made fibres, weighing not more than 200 g/m<sup>2</sup>.</b>
		- <b>Dikelantang :</b>	<b>Bleached</b>
19.	5210.21.00	-- Tenunan polos	plain weave; bleached; woven fabrics of cotton, containing < 85 % by weight of cotton, mixed mainly or solely with man-made fibres, weighing not more than 200 g/m <sup>2</sup>
		- <b>Dicelup :</b>	<b>Dyed</b>
20.	5210.32.00	-- Kepar 3-benang atau 4-benang, termasuk kepar silang	3-thread or 4-thread twill, including cross twill; dyed; woven fabrics of cotton, containing < 85 % by weight of cotton, mixed mainly or solely with man-made fibres, weighing not more than 200 g/m <sup>2</sup>
		- <b>Dari benang aneka warna :</b>	<b>Of yarns of different colours</b>
		-- Tenunan polos :	Plain weave
21.	5210.41.10	--- Tenun ikat	ikat fabric; plain weave; of yarns of different colours; woven fabrics of cotton, containing < 85 % by weight of cotton, mixed mainly or solely with man-made fibres, weighing not more than 200 g/m <sup>2</sup>
22.	5210.49.00	-- Kain lainnya	other than plain weave; of yarns of different colours; woven fabrics of

No	Nomor HS	Uraian Barang	Description of Goods
			<i>cotton, containing &lt; 85 % by weight of cotton, mixed mainly or solely with man-made fibres, weighing not more than 200 g/m2</i>
		- <b>Dicetak :</b>	<b>Printed</b>
		- - Tenunan polos :	<i>Plain weave</i>
23.	5210.51.10	- - - Dicetak dengan proses batik tradisional	<i>plain weave; printed by the traditional batik process; woven fabrics of cotton, containing &lt; 85 % by weight of cotton, mixed mainly or solely with man-made fibres, weighing not more than 200 g/m2</i>
	5210.59	- - Kain lainnya :	<i>Other fabrics</i>
24.	5210.59.10	- - - Dicetak dengan proses batik tradisional	<i>other than plain weave; printed by the traditional batik process; woven fabrics of cotton, containing &lt; 85% by weight of cotton, mixed mainly or solely with man-made fibres, weighing ≤ 200 g/m2</i>
25.	5210.59.90	- - - Lain-lain	<i>other than plain weave; printed by other than the traditional batik process; woven fabrics of cotton, containing &lt; 85% by weight of cotton, mixed mainly/solely with man-made fibres, weighing ≤200g/m2</i>
		Kain tenunan dari kapas, mengandung kapas kurang dari 85 % menurut beratnya, dicampur terutama atau semata-mata dengan serat buatan, beratnya lebih dari 200 g/m2.	<b>Woven fabrics of cotton, containing less than 85 % by weight of cotton, mixed mainly or solely with man-made fibres, weighing more than 200 g/m2</b>
		- <b>Dicelup :</b>	<b>Dyed</b>
26	5211.31.00	- - Tenunan polos	<i>plain weave; dyed; woven fabrics of cotton, containing &lt; 85 % by weight of cotton, mixed mainly or solely with man-made fibres, weighing more than 200 g/m2</i>
27	5211.32.00	- - Kepar 3-benang atau 4-benang, termasuk kepar silang	<i>3-thread or 4-thread twill, including cross twill; dyed; woven fabrics of cotton, containing &lt; 85 % by weight of cotton, mixed mainly or solely with man-made fibres, weighing more than 200 g/m2</i>
28	5211.39.00	- - Kain lainnya	<i>woven fabrics of cotton, contain&lt;85%by weight of cotton,mixed mainly/solely with man-made fibres,weight&gt;200 g/m2;dyed;oth than plain weave;oth than 3-thread or 4-thread twill,including cross twill</i>
		- <b>Dicetak :</b>	<b>Printed</b>
	5211.59	- - Kain lainnya :	<i>Other fabrics</i>
29	5211.59.10	- - - Dicetak dengan proses batik tradisional	<i>woven fabrics of cotton,containing&lt; 85% by weight of cotton,weighing&gt; 200g/m2; printed by the traditional batik process; oth than plain weave;oth than 3-thread or 4-thread twill,</i>

No	Nomor HS	Uraian Barang	Description of Goods
			<i>including cross twill</i>
30	5211.59.90	- - - Lain-lain	<i>woven fabrics of cotton, contain &lt; 85% by weight of cotton, weight &gt; 200g/m<sup>2</sup>; printed by other than the traditional batik process; other than plain weave; other than 3-thread or 4-thread twill, including cross twill</i>
		Kain tenunan lainnya dari kapas.	<b>Other woven fabrics of cotton</b>
		- <b>Beratnya tidak lebih dari 200 g/m<sup>2</sup> :</b>	<b>Weighing not more than 200 g/m<sup>2</sup></b>
	5212.15	- - Dicetak :	<i>Printed</i>
31	5212.15.90	- - - Lain-lain	<i>woven fabrics of cotton; weighing not more than 200 g/m<sup>2</sup>; printed by other than the traditional batik process</i>
		- <b>Beratnya lebih dari 200 g/m<sup>2</sup> :</b>	<b>Weighing more than 200 g/m<sup>2</sup></b>
32	5212.21.00	- - Tidak dikelantang	<i>woven fabrics of cotton; weighing more than 200 g/m<sup>2</sup>; unbleached</i>
33	5212.23.00	- - Dichelup	<i>woven fabrics of cotton; weighing more than 200 g/m<sup>2</sup>; dyed</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 kain tenunan dari kapas memiliki karakteristik fisik:

- 1) tidak dikelantang, yaitu kain yang memiliki warna alami dari serat pembentuknya, belum dikelantang, dicelup atau dicetak.
- 2) dikelantang, yaitu:
  - telah melalui proses pengelantangan (*bleached*).
  - mengandung benang yang telah dikelantang.
  - mengandung campuran benang yang dikelantang dan tidak dikelantang.
- 3) dicelup, yaitu:
  - dicelup dengan satu macam warna yang seragam, selain warna putih.
  - mengandung benang yang berwarna seragam.
- 4) dari benang aneka warna, yaitu kain tenunan (selain kain yang dicetak) yang:
  - mengandung benang dengan warna yang berbeda, atau benang berwarna sama namun memiliki nuansa yang berbeda.
  - mengandung benang dikelantang atau tidak dikelantang dan benang berwarna.
- 5) Dicetak, yaitu kain tenunan yang telah melalui proses pencetakan, apakah itu mengandung benang aneka warna maupun tidak, termasuk kain tenun yang dicetak dengan pola, seperti dengan alat semprot (*spray gun*) atau kuas (*brush gun*), dengan sablon, atau proses batik.

### **Barang Produksi Pemohon:**

Kain tenunan dari kapas yang diproduksi Pemohon memiliki karakteristik fisik:

- 1) tidak dikelantang, yaitu kain yang memiliki warna alami dari serat pembentuknya, belum dikelantang, dicelup atau dicetak.
- 2) dikelantang, yaitu:
  - telah melalui proses pengelantangan (*bleached*).
  - mengandung benang yang telah dikelantang.
  - mengandung campuran benang yang dikelantang dan tidak dikelantang.
- 3) dicelup, yaitu:
  - dicelup dengan satu macam warna yang seragam, selain warna putih.
  - mengandung benang yang berwarna seragam.
- 4) dari benang aneka warna, yaitu kain tenunan (selain kain yang dicetak) yang:
  - mengandung benang dengan warna yang berbeda, atau benang berwarna sama namun memiliki nuansa yang berbeda.
  - mengandung benang dikelantang atau tidak dikelantang dan benang berwarna.
- 5) Dicetak, yaitu kain tenunan yang telah melalui proses pencetakan, apakah itu mengandung benang aneka warna maupun tidak, termasuk kain tenun yang dicetak dengan pola, seperti dengan alat semprot (*spray gun*) atau kuas (*brush gun*), dengan sablon, atau proses batik.

### **b. Bahan Baku**

#### **Barang Impor:**

Bahan baku dari barang impor kain tenunan dari kapas adalah benang kapas (selain benang jahit).

#### **Barang Produksi Pemohon:**

Bahan baku kain tenunan dari kapas yang diproduksi oleh Pemohon adalah benang kapas (selain benang jahit).

### **c. Spesifikasi teknis**

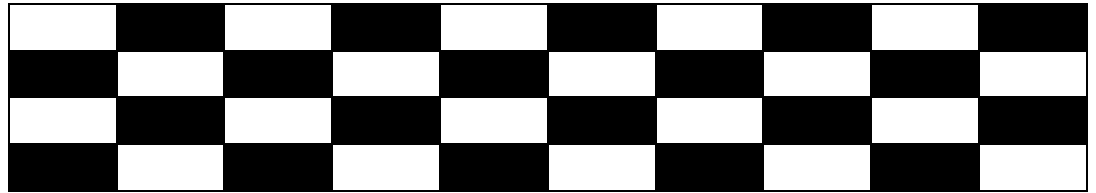
#### **Barang Impor:**

Spesifikasi teknis dari barang impor kain tenunan dari kapas adalah:

- 1) Kandungan kapas pada kain tenunan:
  - mengandung kapas 85% atau lebih menurut beratnya
  - mengandung kapas kurang dari 85 % menurut beratnya, dicampur terutama atau semata-mata dengan serat buatan.
  - lainnya dari kapas.
- 2) Berat kain tenunan:
  - berat kain tidak lebih dari 200 g/m<sup>2</sup> dan
  - berat kain lebih dari 200 g/m<sup>2</sup>.
- 3) Konstruksi kain tenunan:

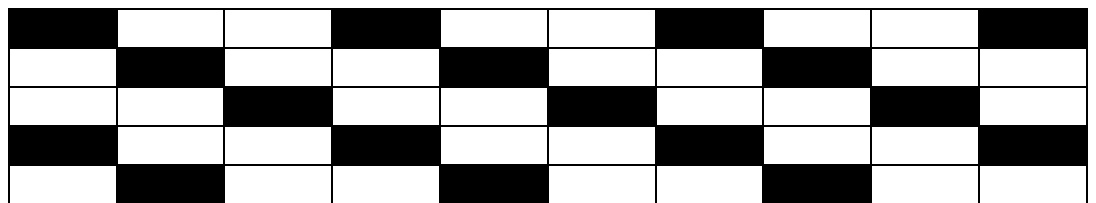
- Kain tenunan polos adalah konstruksi kain yang dibuat dengan menyilangkan benang pakan di atas benang lungsin/lusi dan berikutnya di bawah benang lusi secara bergantian dan terus berulang seperti itu.

Contoh gambar kain tenunan polos:



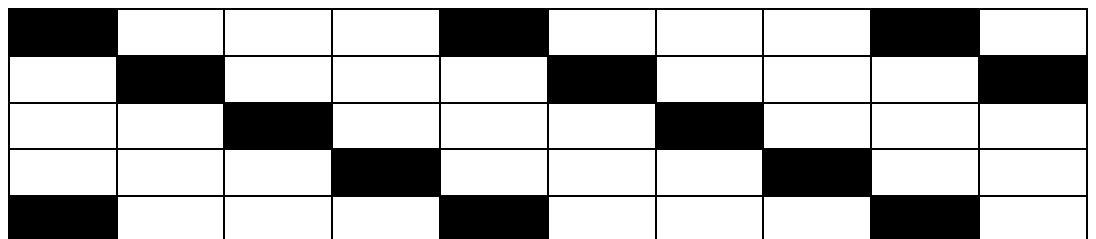
- Kain tenunan kepar-3 benang adalah konstruksi kain yang dibuat dengan menyilangkan benang pakan di atas benang lungsin/lusi yang pertama dan berikutnya melewati 2 (dua) helai benang lusi dan terus berulang seperti itu.

Contoh gambar kain tenunan kepar-3 benang:



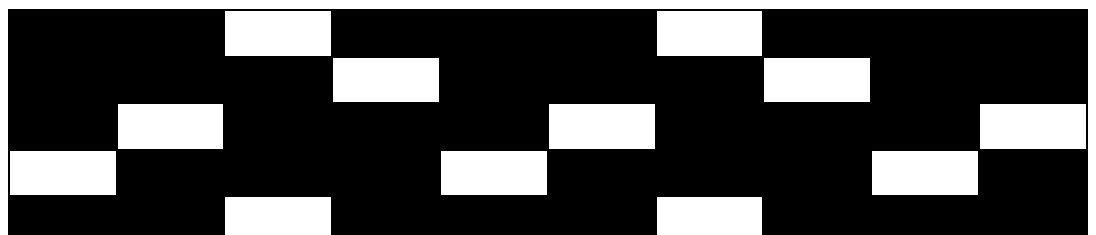
- Kain tenunan kepar-4 benang adalah konstruksi kain yang dibuat dengan menyilangkan benang pakan di atas benang lungsin/lusi yang pertama dan berikutnya melewati 3 (tiga) helai benang lusi dan terus berulang seperti itu.

Contoh gambar kain tenunan kepar-4 benang:



- Kain denim adalah konstruksi kain yang dibuat untuk membuat bahan jeans.

Contoh gambar kain denim:

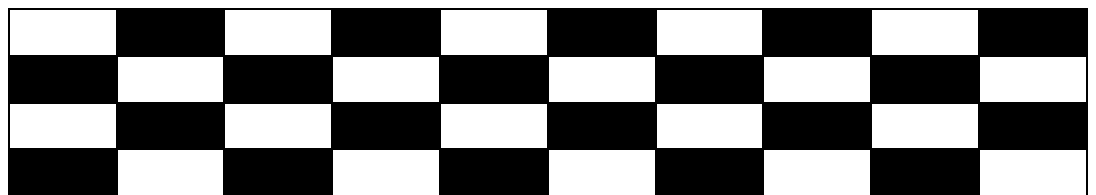


**Barang Produksi Pemohon:**

Spesifikasi teknis dari barang impor kain tenunan dari kapas adalah:

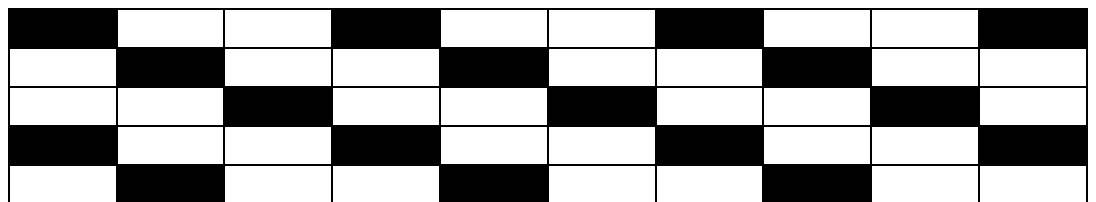
- 4) Kandungan kapas pada kain tenunan:
  - mengandung kapas 85% atau lebih menurut beratnya
  - mengandung kapas kurang dari 85 % menurut beratnya, dicampur terutama atau semata-mata dengan serat buatan.
  - lainnya dari kapas.
- 5) Berat kain tenunan:
  - berat kain tidak lebih dari 200 g/m<sup>2</sup> dan
  - berat kain lebih dari 200 g/m<sup>2</sup>.
- 6) Konstruksi kain tenunan:
  - Kain tenunan polos adalah konstruksi kain yang dibuat dengan menyilangkan benang pakan di atas benang lungsin/lusi dan berikutnya di bawah benang lusi secara bergantian dan terus berulang seperti itu.

Contoh gambar kain tenunan polos:



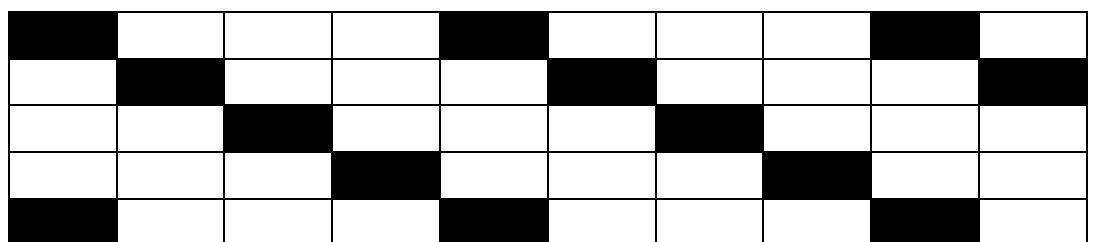
- Kain tenunan kepar-3 benang adalah konstruksi kain yang dibuat dengan menyilangkan benang pakan di atas benang lungsin/lusi yang pertama dan berikutnya melewati 2 (dua) helai benang lusi dan terus berulang seperti itu.

Contoh gambar kain tenunan kepar-3 benang:



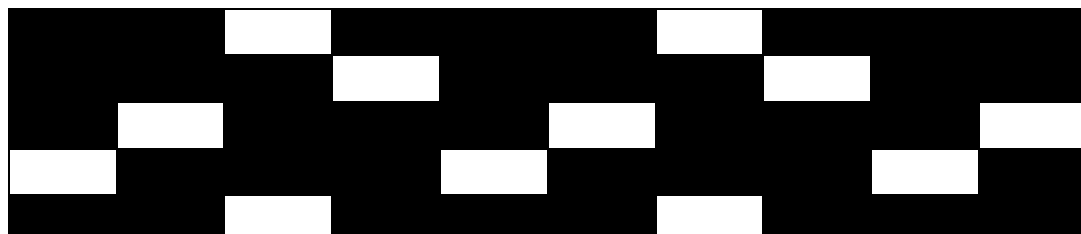
- Kain tenunan kepar-4 benang adalah konstruksi kain yang dibuat dengan menyilangkan benang pakan di atas benang lungsin/lusi yang pertama dan berikutnya melewati 3 (tiga) helai benang lusi dan terus berulang seperti itu.

Contoh gambar kain tenunan kepar-4 benang:



- Kain denim adalah konstruksi kain yang dibuat untuk membuat bahan jeans.

Contoh gambar kain denim:



**d. Kegunaan**

**Barang Impor:**

Kegunaan dari barang impor kain tenunan dari kapas adalah sebagai bahan baku dari pakaian dan aksesoris pakaian.

**Barang Produksi Pemohon:**

Kegunaan dari kain tenunan dari kapas yang diproduksi Pemohon adalah sebagai bahan baku dari pakaian dan aksesoris pakaian.

**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 Relatif Terhadap Produksi Nasional**

Uraian	Satuan	Tahun			Perubahan (%)		Tren 2020-2022 (%)
		2020	2021	2022	2020-2021	2021-2022	
Jumlah Impor	Ton	21.976	39.678	41.978	80,55	5,80	38,21
Produksi Nasional	Indeks	100	124,46	109,25	24,46	(12,22)	4,52
Impor Relatif Terhadap Produksi Nasional	Indeks	100	145,07	174,84	45,07	20,52	32,23

Sumber: Badan Pusat Statistik, Pemohon, diolah

Sebagaimana terlihat pada Tabel 4 di atas, jumlah impor secara absolut mengalami lonjakan dengan tren sebesar 38,21% selama periode 2020-2022. Pada tahun 2021 jumlah impor mengalami peningkatan menjadi sebesar 39.678 ton dari sebelumnya sebesar 21.976 ton pada tahun 2020 atau naik sebesar 80,55%. Pada tahun 2022 jumlah impor mengalami peningkatan menjadi sebesar 41.978 ton dari sebelumnya sebesar 39.678 ton pada tahun



2021 atau naik 5,80%.

Sebagaimana terlihat pada Tabel 4 diatas, jumlah impor secara relatif mengalami lonjakan dengan tren sebesar 32,23% selama periode 2020-2022. Pada tahun 2021 jumlah impor mengalami peningkatan menjadi sebesar 145,07 poin indeks dari sebelumnya sebesar 100 poin indeks pada tahun 2020 atau naik sebesar 45,07%. Pada tahun 2022 jumlah impor mengalami peningkatan menjadi sebesar 174,84 poin indeks dari sebelumnya sebesar 145,07 poin indeks pada tahun 2021 atau naik 20,52%.

## 2. Pangsa Impor

**Tabel 5. Pangsa Negara Asal Impor**

Negara	Tahun					
	2020		2021		2022	
	Volume (Ton)	Pangsa (%)	Volume (Ton)	Pangsa (%)	Volume (Ton)	Pangsa (%)
RRT	15.162	68,99	29.584	74,56	33.618	80,08
Hongkong	3.285	14,95	6.000	15,12	2.062	4,91
Vietnam	340	1,55	1.001	2,52	1.824	4,35
Negara Lainnya	3.185	14,51	3.093	7,88	4.474	10,66
<b>Total</b>	<b>21.976</b>	<b>100</b>	<b>39.678</b>	<b>100</b>	<b>41.978</b>	<b>100</b>

Sumber : BPS, diolah

Berdasarkan pada tabel 5 di atas, pada Tahun 2022 pangsa pasar impor produk kain tenunan dari kapas di pasar domestik di dominasi oleh RRT dengan pangsa pasar impor sebesar 80,08%, diikuti oleh Hongkong dengan pangsa pasar impor sebesar 4,91%, Vietnam sebesar 4,35%, dan Negara Lainnya < 3% yaitu sebesar 10,66%.

## F. INFORMASI KERUGIAN PEMOHON

**Tabel 6. Indikator Kinerja Pemohon**

No	Uraian	Satuan	Tahun			Pertumbuhan (%)		Tren 2020-2022 (%)
			2020	2021	2022	2020-2021	2021-2022	
1	Produksi	Indeks	100	103,14	96,42	3,14	(6,51)	(1,80)
2	Penjualan Domestik	Indeks	100	92,26	86,27	(7,74)	(6,49)	(7,12)
3	Produktivitas	Indeks	100	113,75	109,66	13,75	(3,60)	4,72
4	Kapasitas Terpakai	Indeks	100	103,14	96,42	3,14	(6,51)	(1,80)
5	Keuntungan / Kerugian	Indeks	100	32,15	23,94	(67,85)	(25,53)	(51,07)
6	Tenaga Kerja	Indeks	100	90,67	87,93	(9,33)	(3,02)	(6,23)
7	Persediaan Akhir	Indeks	100	79,35	104,42	(20,65)	31,60	2,19

Sumber: Pemohon, diolah

## **1. Produksi**

Selama periode 2020-2022, produksi Pemohon mengalami penurunan dengan tren sebesar 1,80%. Pada tahun 2020 produksi Pemohon sebesar 100 poin indeks, mengalami peningkatan menjadi sebesar 103,14 poin indeks atau sebesar 3,14% pada tahun 2021. Selanjutnya pada tahun 2022, produksi Pemohon mengalami penurunan sebesar 6,51% dikarenakan penurunan produksi terjadi adanya penurunan permintaan atas produk yang dihasilkan karena barang impor membanjiri pasar dalam negeri.

## **2. Penjualan domestik**

Penjualan domestik selama periode 2020-2022 mengalami penurunan dengan tren sebesar 7,12%. Pada tahun 2020 penjualan domestik sebesar 100 poin indeks, mengalami penurunan menjadi 92,26 poin indeks atau sebesar 7,74% pada tahun 2021. Pada tahun 2022 penjualan domestik kembali mengalami penurunan menjadi sebesar 86,27 poin indeks atau sebesar 6,49%. Hal tersebut disebabkan oleh membanjirnya barang impor yang mendominasi pasar dalam negeri.

## **3. Produktivitas**

Pada tahun 2020, produktivitas sebesar 100 poin indeks, mengalami peningkatan menjadi sebesar 113,75 poin indeks atau sebesar 13,75% pada tahun 2021. Selanjutnya pada tahun 2022, produktivitas mengalami penurunan menjadi sebesar 109,66 poin indeks atau sebesar 3,60%. Selama periode 2020-2022, produktivitas mengalami peningkatan dengan tren sebesar 4,72%. Peningkatan tersebut dikarenakan banyaknya pengurangan jumlah tenaga kerja.

## **4. Kapasitas Terpakai**

Selama periode 2020-2022, kapasitas terpakai Pemohon mengalami penurunan dengan tren sebesar 1,80% yang diakibatkan oleh lonjakan jumlah impor selama periode tersebut. Pada tahun 2020, kapasitas terpakai sebesar 100 poin indeks, mengalami peningkatan menjadi sebesar 103,14 poin indeks pada tahun 2021. Selanjutnya pada tahun 2022, kapasitas terpakai mengalami penurunan menjadi sebesar 96,42 poin indeks.

## **5. Keuntungan/Kerugian**

Pemohon mengalami penurunan keuntungan dengan tren sebesar 51,07%

selama periode 2020-2022. Pada tahun 2020, keuntungan Pemohon sebesar 100 poin indeks dan selanjutnya pada tahun 2021 Pemohon mengalami penurunan keuntungan sebesar 67,85% dibandingkan dengan tahun sebelumnya. Pada tahun 2022, Pemohon kembali mengalami penurunan keuntungan sebesar 23,94 poin indeks. Penurunan keuntungan tersebut dikarenakan pada tahun yang sama berkurangnya penjualan domestik dan meningkatnya jumlah impor pada produk tersebut.

## 6. Tenaga Kerja

Telah terjadi pengurangan jumlah tenaga kerja dengan tren sebesar 6,23% selama periode 2020-2022. Pada tahun 2020 jumlah tenaga kerja sebanyak 100 poin indeks, mengalami penurunan menjadi sebanyak 90,67 poin indeks atau sebesar 9,33% pada tahun 2021. Kemudian pada tahun 2022, jumlah tenaga kerja mengalami penurunan menjadi sebanyak 87,93 poin indeks.

## 7. Persediaan Akhir

Selama periode 2020-2022, persediaan akhir mengalami peningkatan dengan tren sebesar 2,19%. Pada tahun 2020, persediaan akhir sebesar 100 poin indeks, mengalami penurunan menjadi sebesar 79,35 poin indeks atau sebesar 20,65% pada tahun 2021. Selanjutnya pada tahun 2022, persediaan akhir mengalami peningkatan menjadi sebesar 104,42 poin indeks atau sebesar 31,60%.

## G. Pangsa Pasar

**Tabel 7. Konsumsi Nasional, Penjualan Domestik Jumlah Impor, Pangsa Pasar**

No	Indikator	Satuan	2020	2021	2022	Perubahan (%)		Tren 2020-2022 (%)
						2020-2021	2021-2022	
1	Konsumsi Nasional	Indeks	100	101,50	97,15	1,50	(4,29)	(1,43)
2	Penjualan Domestik Pemohon	Indeks	100	92,26	86,27	(7,74)	(6,49)	(7,12)
3	Penjualan Domestik Non Pemohon	Indeks	100	101,26	96,73	1,26	(4,47)	(1,65)
4	Jumlah Impor	Ton	21.976	39.678	41.978	80,55	5,80	38,21
5	Pangsa Pasar Pemohon	Indeks	100	90,89	88,80	(9,11)	(2,31)	(5,77)
6	Pangsa Pasar Non Pemohon	Indeks	100	99,76	99,57	(0,24)	(0,19)	(0,22)
7	Pangsa Pasar Impor	Indeks	100	177,88	196,61	77,88	10,53	40,22

Sumber: Pemohon, IDN, dan BPS, diolah

Pangsa pasar pemohon dan pangsa pasar non pemohon selama tahun 2020-2022 terus mengalami penurunan dengan tren sebesar 5,77% dan 0,22%. Sebaliknya pangsa pasar impor selama tahun 2020-2022 terjadi peningkatan dengan tren sebesar 40,22%. Dengan demikian selama tahun 2020-2022 pangsa pasar impor telah mengambil alih pangsa pasar Pemohon.

## H. PERKEMBANGAN TIDAK TERDUGA (*UNFORESEEN DEVELOPMENT*)

### Pengalihan tujuan Ekspor China karena kebijakan pelarangan impor di Amerika Serikat

Pada tanggal 21 Juni 2022 Amerika Serikat mengeluarkan kebijakan untuk melarang impor 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 kain tenunan dari kapas dari China di Negara Amerika Serikat mengalami penurunan drastis sehingga Negara China mengalihkan tujuan ekspor kain tenunan dari kapas ke Negara lain, salah satunya ke Negara Indonesia dan menyebabkan lonjakan impor Sebagaimana terlihat pada tabel di bawah.

**Tabel 8. Data impor kain tenunan dari kapas dari China**

Uraian	Satuan	Tahun			Perubahan (%)	Tren (%)
		2020	2021	2022		
Impor Amerika Serikat dari China	Ton	25.112	12.767	9.663	(24,31)	(37,97)
Impor Indonesia dari China	Ton	15.162	29.584	33.618	13,63	48,90

Sumber: Trade map

Berdasarkan tabel 8 diatas dengan adanya peraturan pelarangan impor di Amerika Serikat dari Negara China menyebabkan penurunan impor secara drastis pada tahun 2022 menjadi hanya sebesar 9.663 Ton sedangkan secara tren terjadi penurunan sebesar 37,97% selama tahun 2020-2022. 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 13,63% dan secara tren meningkat sebesar 48,90%.

**I. KESEDIAAN UNTUK BEKERJA SAMA**

Pemohon bersedia untuk bekerja sama sepenuhnya sepanjang proses penyelidikan dalam rangka peneraan Tindakan Pengamanan Perdagangan (*Safeguards*) terhadap lonjakan jumlah impor barang kain tenunan dari kapas.

Jakarta, 16 September 2023

  
  
**ASOSIASI PERTEKSTILAN INDONESIA**  
**INDONESIAN TEXTILE ASSOCIATION**  
**Jemmy Kartiwa**  
*Ketua Umum*

## LAMPIRAN 1:

### NAMA DAN ALAMAT IMPORTIR

<b>NO</b>	<b>NAMA PERUSAHAAN</b>	<b>ALAMAT</b>
1	PT. Ungaran Sari Garment III	Jl. Raya Karangjati Pringapus Semarang Jateng
2	PT. Starlight Garment Semarang	Jl. Kyai Ponco Sentiko Tegalpanas Semarang
3	PT. Gistex Garmen Indonesia	Jl. Braga No. 106 Bandung
4	PT. Tun Hong Garment Indonesia	Jl. Raya Pengging Banyudono Boyolali Jateng
5	PT. Winnersumbiri Knitting Factory	Jl. KH. Agus Salim No.18 Cipondoh, Tangerang
6	PT. Inti Sukses Garmindo	Jl. Soekarno Hatta Km. 31 Semarang Jateng
7	PT. Delami Garment Industries	Jl. Soekarno Hatta No. 571 Bandung
8	PT. Indonesia Victory Garment	Jl. Cisantri Cibatu Purwakarta Jabar
9	PT. PAN Pasific Jakarta	Jl. Kalimantan Blok D-27 Cilincing Jakarta
10	PT. Multi Garmen Jaya	Jl. Soekarno Hatta No. 578 Buah batu Bandung
11	PT. Pan Brothers Tbk	Mojosongo Boyolali
12	PT. Indo Taichen Textile Industry	Jl. Gatot Subroto Km. 3 Jatiuwung Tangerang
13	PT. Eco Smart Garment Indonesia	Ds. Blumbang Klego Boyolali Jateng
14	PT. Dan Liris	Jl. Merapi 23 Ds. Banaran Sukoharjo Jateng
15	PT. Ziben Indonesia	Jl. Raya Pendidikan Cibadung Bogor Jabar
16	PT. Masterindo Jaya Abadi	Jl. Soekarno Hatta No. 24 Cibuntu Bandung
17	PT. Mega Putra Garment	Jl. Karet Pedurenan No. 240 Karet Kuningan Jakarta
18	PT. Mataram Tunggal Garment	Ds. Donoharjo Sleman Yogyakarta
19	PT. Lucky Textile Semarang	Jl. Coaster No. 8 Blok A07-10 Tanjung Emas Semarang
20	Argo Manunggal Triasta	Jl. MH Thamrin Km. 4 Cikokol Tangerang

### NAMA DAN ALAMAT ASOSIASI IMPORTIR

<b>NO</b>	<b>ASOSIASI</b>	<b>ALAMAT</b>
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

<b>NO</b>	<b>NAMA PERUSAHAAN</b>	<b>ALAMAT</b>
1	Gungzhou Gutex Holdings Limited	11-14th Floor, No 2 Fuqian Road, Yuexiu District Guangzhou, Guangdong 510030, China
2	Changzhou Laojinjuan Textile Co Ltd	Room 707, Phoenix Building, No 555 Tongjiang Mid Road Xinbei District, Changzhou, Jiangsu 213022, China
3	Hebei Xindadong Textile Co Ltd	No 21 Gongye Road, Jinzhou City Hebei 050026, China
4	Elaf (Fujian) Textile Technology Co Ltd	No 1-2, Building B, Fufeng Commercial Town, Nanyang Road Shishi, Fujian 362700, China
5	Jiangyin City Chamber Knitting Co Ltd	No 1 Zhoujiawan, Songqiao Yunting Street, Jiangyin Jiangsu 214400, China
6	Argus Textile Technology Co Ltd	Room C, 3rd Floor, Building 3, No 889 Yishan Road Shanghai 200233, China
7	Shaoxing Henglan Textile Co Ltd	No 117, 3/F, Distric B, Dongsheng Road Market Keqiao District, Shaoxing, Zhejiang 312000 China
8	Wujiang Hengjia Textile Co Ltd	No 3 North Hong An Road, North Economic Development Zone Shengze Wujiang, Jiangsu 2152228, China
9	Jiangyin First Textile Co Ltd	No 55 Yabao Road, Shengang Town Lingang Economic Development Zone, Jiangyin Jiangsu 214443, China
10	Kayjune Company	B&K Building 4F, 25, Eonju-to 85-Gil, Gangnam- Gu, Seoul, Republic of Korea



1 November 2023

(23-7385)

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 Fabric*

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 Fabric under Harmonized System (HS.) Code 5208.21.00, 5208.22.00, 5208.31.90, 5208.33.00, 5208.41.90, 5208.42.10, 5208.42.90, 5208.43.00, 5208.52.10, 5208.59.20, 5208.59.90, 5209.11.10, 5209.11.90, 5209.19.00, 5209.21.00, 5209.31.00, 5209.49.00, 5209.51.10, 5210.21.00, 5210.32.00, 5210.41.10, 5210.49.00, 5210.51.10, 5210.59.10, 5210.59.90, 5211.31.00, 5211.32.00, 5211.39.00, 5211.59.10, 5211.59.90, 5212.15.90, 5212.21.00, and 5212.23.00 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/DokumenPenyelidikanProdukKainTenunandariKapas>

**4 POINT OF CONTACT FOR THE INVESTIGATION**

The contact information of the Investigating Authority for correspondence is:

**THE INDOONESIAN SAFEGUARDS COMMITTEE**

Komite Pengamanan Perdagangan Indonesia (KPPI)  
Jl. M.I. Ridwan Rais No.5, Building I, 5<sup>th</sup> floor, Jakarta 10110  
Telephone / Facsimile: (62-21) 385 7758  
E-mail: [kppi@kemendag.go.id](mailto: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 Wednesday, 29 November 2023 from 2.00 - 4.00 pm (GMT+7). All interested parties, who wish to participate in the hearing and all written evidence and views, submitted to the Investigating Authority no later than 22 November 2023. Registration on the day of the hearing (29 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](http://www.kemendag.go.id)



### **KPPI Starts Investigation of Safeguard Measures Surge in Imports of Woven Fabrics from Cotton**

**Jakarta, 27 October 2023** – The Indonesian Trade Safeguard Committee (KPPI) has initiated an investigation into Trade Security Measures (*Safeguard Measures*) regarding the surge in the number of imports of woven cotton fabric goods starting Friday (27/10). Imports of woven cotton fabric include 33 8-digit *Harmonized System* (HS) numbers, namely HS. 5208.21.00, 5208.22.00, 5208.31.90, 5208.33.00, 5208.41.90, 5208.42.10, 5208.42.90, 5208.43.00, 5208.52.10, 5208.59.20, 5208.59.90, 5209.11.10, 5209.11.90, 5209.19.00, 5209.21.00, 5209.31.00, 5209.49.00, 5209.51.10, 5210.21.00, 5210.32.00, 5210.41.10, 5210.49.00, 5210.51.10, 5210.59.10, 5210.59.90, 5211.31.00, 5211.32.00, 5211.39.00, 5211.59.10, 5211.59.90, 5212.15.90, 5212.21.00, and 5212.23.00 based on the 2022 Indonesian Customs Tariff Book (BTKI).

The investigation was based on a request from the Indonesian Textile Association (API) on September 18 2023, which represents the domestic industry producing woven cotton fabrics.

*"From the initial evidence of applications submitted by API, KPPI found that there was a spike in numbers import of woven cloth goods from cotton. KPPI also found initial indications of serious losses or threats of serious losses experienced by the domestic industry as a result of the surge in the number of imports of woven cotton fabric goods,"* said Plt. Chairman of KPPI Nugraheni Prasetya Hastuti.

According to Nugraheni, serious losses or threats of serious losses can be seen from a number of domestic industry performance indicators in the 2019-2022 period. *"These indicators are the decline in production volume, domestic sales, used capacity, profits; decreasing number of workers; increased inventory; as well as the decline in API market share in the domestic market,"* explained Nugraheni.

Based on data from the Central Statistics Agency (BPS), in the last three years (2020-2022), there has been an increase in the number of imports of woven cotton fabrics with a trend of 38.21 percent. In 2020, the amount of imports of these products was 21,976 tons. In 2021 imports will increase 80.55 percent to 39,678 tons. Furthermore, in 2022 imports will increase 5.80 percent to 41,978 tons.

The origin of imports of woven cotton fabric goods is from the People's Republic of China (PRC) amounting to 80.08 percent, Hong Kong (4.91 percent), Vietnam (4.35 percent), and other countries (10.66 percent).

KPPI invites all interested parties to register as 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 1 Floor 5

Jakarta 10110

Tel/Fax (021) 3857758

Email: [kppi@kemendag.go.id](mailto:kppi@kemendag.go.id)

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**More information contact:**

**M. Rivai Abbas**

**Plt. Head of Public Relations Bureau**

**Ministry of Trade** Email:

[Pusathumas@kemendag.go.id](mailto:Pusathumas@kemendag.go.id)

**Indonesian Trade Security Committee**

Email: [kppi@kemendag.go.id](mailto:kppi@kemendag.go.id)

**INITIAL EVIDENCE FOR INVESTIGATION REQUESTS  
IN THE FRAMEWORK OF IMPLEMENTATION  
TRADE SECURITY MEASURES  
AGAINST THE SURGE IN THE AMOUNT OF IMPORTED GOODS  
FABRIC WOVEN FROM COTTON IN  
INTO HS NUMBER:**

**5208.21.00, 5208.22.00, 5208.31.90, 5208.33.00,  
5208.41.90, 5208.42.10, 5208.42.90, 5208.43.00,  
5208.52.10, 5208.59.20, 5 208.59.90, 5209.11.10,  
5209.11. 90, 5209.19.00, 5209.21.00, 5209.31.00,  
5209.49.00, 5209.51.10, 5210.21.00, 5210.32.00,  
5210.41.10, 5210.49.00, 5210.51.1 0, 5210.59.10,  
5210.59.90, 5211.31.00, 5211.32.00, 5211.39.00,  
5211.59.10, 5211.59.90, 5212.15.90, 5212.21.00,  
and 5212.23.00**

**NOT SECRET**

**DELIVERED BY  
INDONESIAN TEXTILE ASSOCIATION  
YEAR 2023**



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

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

**Table 1. List of Manufacturers Represented by the Applicant**

Company name	Address	Phone & Email
1. PT. Delta Merlin Clothing Textiles	Jl. Raya Timur, Kenatan, Bumiaji, District. Sragen, Sragen Regency, Central Java 57254 (KM 10)	(0271) 887008 duniatex@gmail.com
2. 2. PT. Delta Clothing World Textiles	Jl. Raya Semarang-Demak Km. 14, Tambakroto, Sayung, Batu Lor, Batu, Kec. Demak, Demak Regency, Central Java 59563	(024) 6514232 deltaduniasandang@gmail .com
3. PT. Textile World Delta	Jl. Maospati - Solo, Gerdu, Jetis, Kec. Jaten, Karanganyar Regency, Central Java 57731	(0271) 622878 personaliaddtpondok@gm ail.com
4. 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
5. PT. Delta Merlin Textile World	Pd. III, Pondok, Kec. Grogol, Sukoharjo Regency, Central Java 57552, Indonesia	(0271) 653113 personneladmdt5@gmail.co m
6. PT. Damaitex	Jl. Simongan No. 100, Ngemplak Simongan, Kec. West Semarang, Semarang City, Central Java 50148	(024) 7605804 ptdamirex_smg@yahoo.co .id
7. PT. Djohartex	Jl. Raya Magelang - Purworejo, Km 9, Magelang Regency	(0293)-362729 djohartex@gmail.com
8. PT. Kosoema Nanda Putra	Jl. Karangdowo KM. 3, Jatimulyo, Pedan, Klaten 57468	(0272) 897318 info@kosoemanandaputra. co.id
9. PT. Original Color Sari	Jl. Hos Cokroaminoto no. 28 Pucang Sawit, Surakarta, Central Java. Indonesia 57125	+62 271 648747 publications.swag@gmail.com
10.PT. Sri Rejeki Isman	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	56.13
Non Applicant Production	43.87
<b>National Production</b>	<b>100</b>

Source: IDN and Applicant, processed

The Applicant's total production in 2022 is 56.13% of total production national. Based on the data in table 2 above, this is in accordance with provisions of Government Regulation (PP) 34 of 2011 concerning Anti-Dumping, Subsidies and Trade Security Measures Chapter I Article I paragraph 18, where the Petitioner's production constitutes a large proportion of the overall production of Woven Cloth from Cotton in Indonesia, so that it meets requirements as an IDN in terms of Security Measures.

### D. GOODS FOR WHICH PROTECTION IS REQUESTED

#### 1. Item Description

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

**Table 3. Description of Goods for which Protection is Requested**

No	HS Number	Description of	Description of Goods
		<b>Goods</b> Fabric woven from cotton, containing 85% cotton or more by weight, weighing not more than 200 g/m <sup>2</sup> .	Woven fabrics of cotton, containing 85 % or more by weight of cotton, weighing not more than 200 g/m <sup>2</sup> .
		<b>- Bleached:</b> - -	<b>bleached</b>
1.	5208.21.00	Plain weave, weighing not more than 100 g/m <sup>2</sup>	<i>plain weave, weighing not more than 100 g/m<sup>2</sup>; bleached; containing 85 % or more by weight of cotton</i>
2.	5208.22.00	- - Plain weave, weighing more than 100 g/m <sup>2</sup>	<i>plain weave, weighing more than 100 g/m<sup>2</sup>; bleached; containing 85 % or more by weight of cotton</i>
		<b>- Dyed:</b>	<b>Dyed</b>
		- - Plain weave, weighing not more than 100 g/m <sup>2</sup> :	<i>Plain weave, weighing not more than 100 g/m<sup>2</sup></i>
3.	5208.31.90	- - - Etc	<i>other than voile; plain weave, weighing not more than 100 g/m<sup>2</sup>; dyed; containing 85 % or more by weight of cotton</i>
4.	5208.33.00	- - 3-thread or 4-thread twill threads, including cross twill	<i>3-thread or 4-thread twill, including cross twill; dyed; containing 85 % or more by weight of cotton</i>
		<b>- From yarns of different colors:</b> <b>Of</b>	<b>yarns of different colors</b>

No HS Number	Description of goods	Description of Goods
	-- Plain weave, <b>not</b> heavy more than 100 g/m2 :	<i>Plain weave, weighing more than 100 g/m2</i>
5. 5208.41.90	--- Etc	<i>other than ikat fabric; plain weave, weighing not more than 100 g/m2; of yarn of different colors; containing 85 % or more by weight of cotton</i>
	5208.42	-- Plain weave, weighing more than 100 g/m2 :
6. 5208.42.10	--- Ikat weaving	<i>tie fabric; plain weave, weighing more than 100 g/m2; of yarn of different colors; containing 85 % or more by weight of cotton</i>
7. 5208.42.90	--- Etc	<i>other than ikat fabric; plain weave, weighing more than 100 g/m2; of yarn of different colors; containing 85 % or more by weight of cotton</i>
8. 5208.43.00	-- 3-thread or 4-thread twill threads, including cross twill	<i>3-thread or 4-thread twill, including cross twill; plain weave, weighing more than 100 g/m2; of yarn of different colors; containing 85 % or more by weight of cotton</i>
	<b>- Printed:</b>	<b>Printed</b>
	-- Plain weave, weighing more than 100 g/m2 :	<i>Plain weave, weighing not more than 100 g/m2</i>
9. 5208.52.10	--- Printed using the traditional batik process	<i>plain weave, weighing more than 100g/m2; printed by the traditional batik process; containing 85 % or more by weight of cotton</i>
	5208.59	-- Other fabrics:
10. 5208.59.20	--- Others, 3-thread or 4-thread twill, including cross twill	<i>woven fabrics; other than plain weave; printed; 3-thread or 4-thread twill, including cross twill; containing 85 % or more by weight of cotton, weighing not more than 200 g/m2</i>
11. 5208.59.90	--- Etc	<i>woven fabrics; oth than plain weave; printed by oth than traditional batik process; oth than 3-thread or 4-thread twill, including cross twill; containing ý85% by weight of cotton, weighing &lt; 200 g/m2</i>
	<b>Fabric woven from cotton, containing 85% or more cotton by weight, weighing more than 200 g/m2.</b>	<b>Woven fabrics of cotton, containing 85 % or more by weight of cotton, weighing more than 200 g/m2</b>
	<b>- Unbleached : -- Plain</b>	<b>Unbleached</b>
	weave : --- Duck and	<i>Plain weave</i>
12. 5209.11.10	canvas	<i>duck and canvas; plain weave; unbleached; woven fabrics of cotton, containing ý 85 % by weight of cotton, weighing &gt; 200 g/m2</i>
13. 5209.11.90	--- Etc	<i>other than duck and canvas; plain weave; unbleached; woven fabrics of cotton, containing ý 85 % by weight of cotton, weighing &gt; 200 g/m2</i>
14. 5209.19.00	-- Other fabrics	<i>woven fabrics of cotton, containing</i>



No	HS Number	Description of goods	Description of Goods
			ý 85 % by weight of cotton, weighing > 200 g/m2; unbleached; other than plain weave; other than 3-thread or 4-thread twill, including cross twill
		- <b>Bleached:</b>	<b>Bleached</b>
15.	5209.21.00	-- Plain weave	woven fabrics of cotton, containing ý 85 % by weight of cotton, weighing > 200 g/m2; unbleached; other than plain weave; other than 3-thread or 4-thread twill, including cross twill
		- <b>Dyed:</b>	<b>Dyed</b>
16.	5209.31.00	-- Plain weave	plain weave; dyed; woven fabrics of cotton, containing ý 85 % by weight of cotton, weighing > 200 g/m2
		- <b>From yarns of different colors: Of</b>	<b>yarns of different colors</b>
17.	5209.49.00	-- Other fabrics	woven fabrics of cotton, containing ý 85 % by weight of cotton, weighing > 200 g/m2; of yarns of different colors; other than those of subheadings 520941-520943
		- <b>Printed:</b>	<b>Printed</b>
		-- Plain weave:	Plain weave
18.	5209.51.10	--- Printed using the traditional batik process	plain weave; printed by the traditional batik process; woven fabrics of cotton, containing ý 85 % by weight of cotton, weighing > 200 g/m2
		Woven fabrics of cotton , containing less than 85 % cotton , containing less than 85 % by weight, mixed with <b>weight of cotton, mixed mainly</b> or solely <b>with man-made fibers</b> , with artificial fibers, by weight <b>weighing not more than 200</b> not more than 200 g/m2.	<b>g/m2.</b>
		- <b>Bleached: Bleached</b>	
19.	5210.21.00	-- Plain weave <i>plain weave; bleached;</i>	woven fabrics of cotton, containing < 85 % by weight of cotton, mixed mainly or solely with man-made fibers, weighing not more than 200 g/m2
		- <b>Dyed:</b>	<b>Dyed</b>
20.	5210.32.00	-- 3-thread or 4-thread twill threads, including cross twill	3-thread or 4-thread twill, including cross twill; dyed; woven fabrics of cotton, containing < 85 % by weight of cotton, mixed mainly or solely with man-made fibers, weighing not more than 200 g/m2
		- <b>From yarns of different colors: Of</b>	<b>yarns of different colors</b>
		-- Plain weave:	Plain weave
21.	5210.41.10	--- Ikat weaving	tie fabric; plain weave; of yarns of different colors; woven fabrics of cotton, containing < 85 % by weight of cotton, mixed mainly or solely with man-made fibers, weighing not more than 200 g/m2
22.	5210.49.00	-- Other fabrics	other than plain weave; of yarns of different colors; woven fabrics of

No HS Number	Description of goods	Description of Goods
		<i>cotton, containing &lt; 85 % by weight of cotton, mixed mainly or solely with man-made fibers, weighing not more than 200 g/m2</i>
	<b>- Printed:</b>	<b>Printed</b>
	- - Plain weave:	<i>Plain weave</i>
23. 5210.51.10	- - - Printed using the traditional batik process	<i>plain weave; printed by the traditional batik process; woven fabrics of cotton, containing &lt; 85 % by weight of cotton, mixed mainly or solely with man-made fibers, weighing not more than 200 g/m2</i>
	5210.59	- - Other fabrics:
24. 5210.59.10	- - - Printed using the traditional batik process	<i>other than plain weave; printed by the traditional batik process; woven fabrics of cotton, containing &lt; 85% by weight of cotton, mixed mainly or solely with man-made fibers, weighing &gt; 200 g/m2</i>
25. 5210.59.90	- - - Etc	<i>other than plain weave; printed by other than the traditional batik process; woven fabrics of cotton, containing &lt; 85% by weight of cotton, mixed mainly/solely with man-made fibers, weighing &gt; 200g/m2</i>
	Fabrics woven from cotton, containing less than 85% cotton by weight, mixed mainly or solely with artificial fibers, weighing more than 200 g/m2.	<b>Woven fabrics of cotton, containing less than 85 % by weight of cotton, mixed mainly or solely with man-made fibers, weighing more than 200 g/m2</b>
	<b>- Dyed: - -</b>	<b>Dyed</b>
26 5211.31.00	Plain weave	<i>plain weave; dyed; woven fabrics of cotton, containing &lt; 85 % by weight of cotton, mixed mainly or solely with man-made fibers, weighing more than 200 g/m2</i>
27 5211.32.00	- - 3-thread or 4-thread twill threads, including cross twill	<i>3-thread or 4-thread twill, including cross twill; dyed; woven fabrics of cotton, containing &lt; 85 % by weight of cotton, mixed mainly or solely with man-made fibers, weighing more than 200 g/m2</i>
28 5211.39.00	- - Other fabrics	<i>woven fabrics of cotton, containing &lt; 85% by weight of cotton, mixed mainly/solely with man-made fibers, weight &gt; 200 g/m2; dyed; other than plain weave; other than 3-thread or 4-thread twill, including cross twill</i>
	<b>- Printed:</b>	<b>Printed</b>
	5211.59	- - Other fabrics:
29 5211.59.10	- - - Printed using the traditional batik process	<i>woven fabrics of cotton, containing &lt; 85% by weight of cotton, weighing &gt; 200g/m2; printed by the traditional batik process; other than plain weave; other than 3-thread or 4-thread twill,</i>

No HS Number	Description of goods	Description of Goods
		<i>including cross twill</i>
30 5211.59.90	- - - Etc	woven fabrics of cotton, contain < 85% by weight of cotton, weight > 200g/m <sup>2</sup> ; printed by other than the traditional batik process; other than plain weave; other than 3-thread or 4-thread twill, including cross twill
	Other woven fabrics from cotton.	<b>Other woven fabrics of cotton</b>
	- Weighing no more than 200 g/m <sup>2</sup> :	<b>Weighing not more than 200 g/m<sup>2</sup></b>
5212.15	- - Printed: - -	<i>Printed</i>
31 5212.15.90	- Others	woven fabrics of cotton; weighing not more than 200 g/m <sup>2</sup> ; printed by other than the traditional batik process
	- Weighs more than 200 g/m <sup>2</sup> :	<b>Weighing more than 200 g/m<sup>2</sup></b>
32 5212.21.00	- - Unbleached	woven fabrics of cotton; weighing more than 200 g/m <sup>2</sup> ; unbleached
33 5212.23.00	- - Dyed	woven fabrics of cotton; weighing more than 200 g/m <sup>2</sup> ; dyed

Source: BTKI 2022

## 2. Complete description of similar goods or direct goods

### Compete with Researched Items

#### a. Physical Characteristics

##### Imported Goods:

Imported cotton woven fabrics have the following physical characteristics:

- 1) unbleached, namely fabric that has the natural color of the fibers that form it, has not been bleached, dyed or printed.
- 2) bleached, namely:
  - has gone through a bleaching process .
  - contains bleached threads.
  - contains a mixture of bleached and unbleached yarns bleached.
- 3) dyed, namely:
  - dyed with one kind of uniform color, other than color white.
  - contains uniformly colored threads.
- 4) of threads of various colors, namely woven fabric (other than printed fabric) that:
  - contain threads of different colors, or threads of the same color but have different shades.
  - contains bleached or unbleached threads and colored threads.
- 5) Printed, namely woven fabric that has gone through a printing process, whether it contains threads of various colors or not, including woven fabric printed with patterns, such as with a spray gun or brush , with screen printing, or other processes. batik.

**Applicant's Production Goods:**

The cotton woven fabric produced by the Applicant has characteristics

physique:

- 1) unbleached, namely fabric that has the natural color of the fibers that form it, has not been bleached, dyed or printed.
- 2) bleached, namely:
  - has gone through a bleaching process .
  - contains bleached threads.
  - contains a mixture of bleached and unbleached yarns bleached.
- 3) dyed, namely:
  - dyed with one kind of uniform color, other than color white.
  - contains uniformly colored threads.
- 4) of threads of various colors, namely woven fabric (other than printed fabric) that:
  - contain threads of different colors, or threads of the same color but have different shades.
  - contains bleached or unbleached threads and colored threads.
- 5) Printed, namely woven fabric that has gone through a printing process, whether it contains threads of various colors or not, including woven fabric printed with patterns, such as with a spray gun or brush , with screen printing, or other processes. batik.

**b. Raw material**

**Imported Goods:**

The raw material for imported goods made from woven cotton is yarn cotton (other than sewing thread).

**Applicant's Production Goods:**

The raw material for woven fabric is cotton produced by the Applicant is cotton thread (other than sewing thread).

**c. Technical specifications**

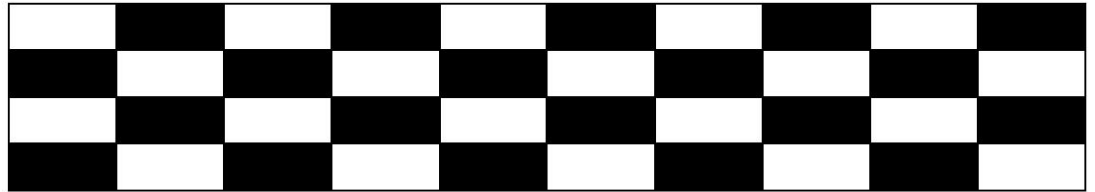
**Imported Goods:**

The technical specifications of imported cotton woven fabrics are:

- 1) Cotton content in woven fabric:
  - contains 85% or more cotton by weight
  - contains less than 85 % cotton by weight, mixed mainly or solely with artificial fibers.
  - others from cotton.
- 2) Woven fabric weight:
  - fabric weight is not more than 200 g/m<sup>2</sup> and
  - fabric weight is more than 200 g/m<sup>2</sup>.
- 3) Woven fabric construction:

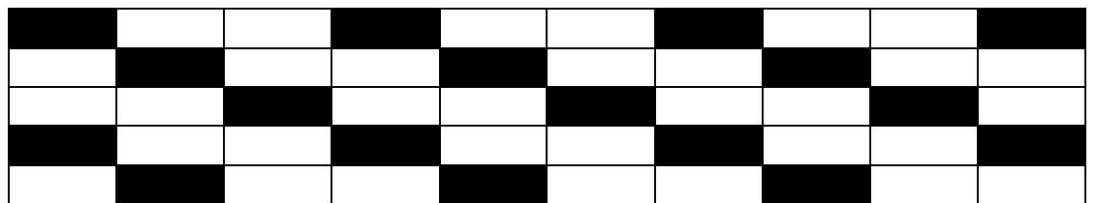
- Plain woven fabric is a fabric construction that is made by crossing the weft threads over the warp threads and then under the warp threads alternately and continuing to repeat like that.

Example of a plain weave fabric:



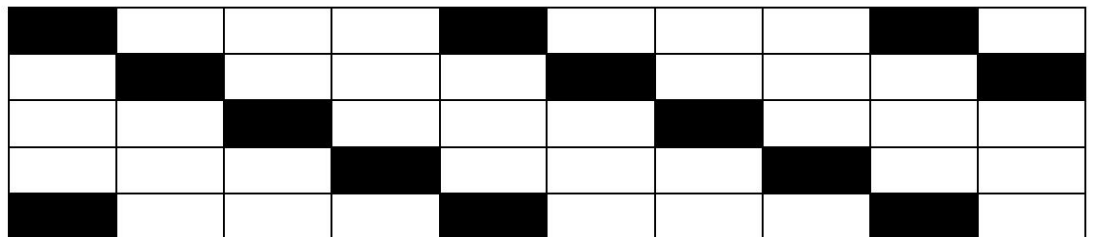
- 3 thread twill woven fabric is a fabric construction made by crossing the weft thread over the first warp/warp thread and then passing through 2 (two) strands of warp thread and continuing to repeat like that.

Example of a 3 thread twill woven fabric:



- 4-thread twill woven fabric is a fabric construction made by crossing the weft thread over the first warp/warp thread and then passing through 3 (three) strands of warp thread and continuing to repeat like that.

Example of a 4 thread twill woven fabric:



- Denim fabric is a fabric construction made for making jeans material.

Example of a denim fabric image:



**Applicant's Production Goods:**

The technical specifications of imported cotton woven fabrics are:

4) Cotton content in woven fabric:

- contains 85% or more cotton by weight
- contains less than 85 % cotton by weight, mixed mainly or solely with artificial fibers.
- others from cotton.

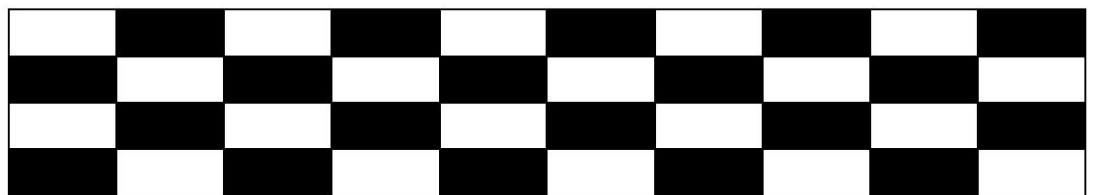
5) Woven fabric weight:

- fabric weight not more than 200 g/m<sup>2</sup> and
- fabric weight more than 200 g/m<sup>2</sup>.

6) Woven fabric construction:

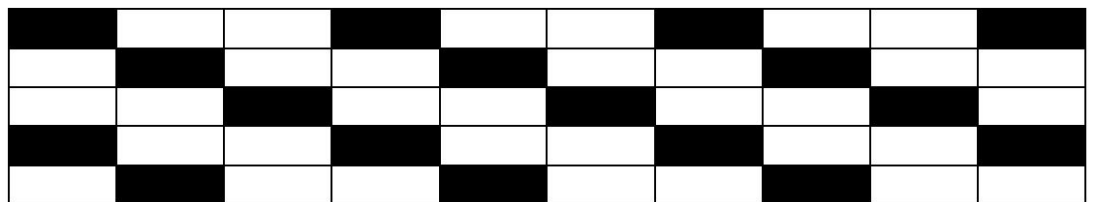
- Plain woven fabric is a fabric construction that is made by crossing the weft threads over the warp threads and then under the warp threads alternately and continuing to repeat like that.

Example of a plain weave fabric:



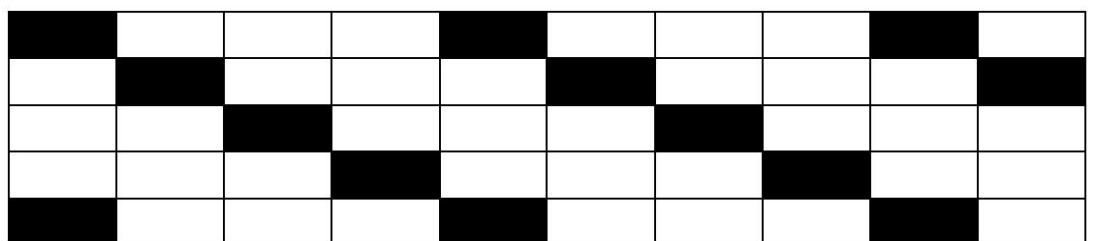
- 3-thread twill woven fabric is a fabric construction made by crossing the weft thread over the first warp/warp thread and then passing through 2 (two) strands of warp thread and continuing to repeat like that.

Example of a 3 thread twill woven fabric:



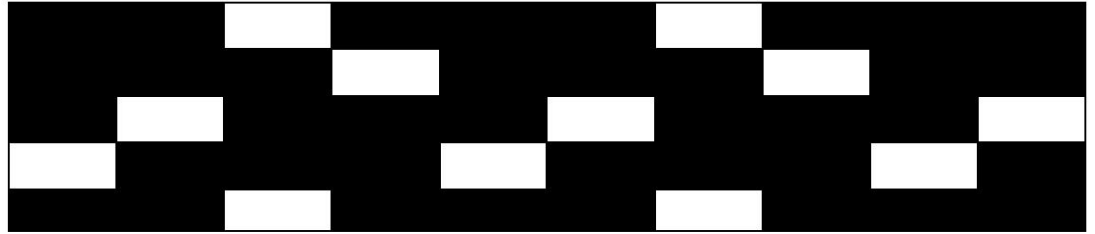
- 4-thread twill woven fabric is a fabric construction made by crossing the weft thread over the first warp/warp thread and then passing through 3 (three) strands of warp thread and continuing to repeat like that.

Example of a 4 thread twill woven fabric:



- Denim fabric is a fabric construction made for making jeans material.

Example of a denim fabric image:



#### d. Utility

##### Imported Goods:

The uses of imported woven cotton fabrics are as follows  
raw materials for clothing and clothing accessories.

##### Applicant's Production Goods:

The uses of the woven cotton fabric produced by the Petitioner are:  
as raw materials for clothing and clothing accessories.

### 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. Number of Imports Relative to National Production**

Description	Unit	Year			Change (%)		Trends 2020- 2022 (%)
		2020	2021	2022	2020- 2021	2021- 2022	
Import Amount	Tons	21,976	39,678	41,978	80.55	5.80	38.21
National Production Index		100	124.46	109.25	24.46	(12.22)	4.52
Relative Import To National Production	Index	100	145.07	174.84	45.07	20.52	32.23

Source: Central Statistics Agency, Applicant, processed

As can be seen in Table 4 above, the absolute amount of imports experienced a spike with a trend of 38.21% during the 2020-2022 period.

In 2021 the number of imports will increase to 39,678 tons from the previous 21,976 tons in 2020 or an increase amounting to 80.55%. In 2022 the number of imports will increase to 41,978 tons from the previous year of 39,678 tons

2021 or up 5.80%.

As can be seen in Table 4 above, the relative amount of imports experienced a spike with a trend of 32.23% during the 2020-2022 period.

In 2021 the number of imports will increase to

145.07 index points from the previous 100 index points in year

2020 or an increase of 45.07%. In 2022 the number of imports will increase

an increase of 174.84 index points from the previous amount

145.07 index points in 2021 or an increase of 20.52%.

## 2. Import Share

**Table 5. Share of Import Origin Countries**

Country	Year					
	2020		2021		2022	
	Volume Share (%)	Volume Share (Tons)	Volume Share (%)	Volume Share (Tons)	Volume Share (%)	Volume Share (Tons)
PRC	15,162	68.99	29,584	74.56	33,618	80.08
Hong Kong	3,285	14.95	6,000	15.12	2,062	4.91
Vietnamese	340	1.55	1,001	2.52	1,824	4.35
Other Countries	3,185	14.51	3,093	7.88	4,474	10.66
<b>Total</b>	<b>21,976</b>	<b>100</b>	<b>39,678</b>	<b>100</b>	<b>41,978</b>	<b>100</b>

Source: BPS, processed

Based on table 5 above, in 2022 the import market share

Woven cotton fabric products in the domestic market are dominated by China

with an import market share of 80.08%, followed by Hong Kong with

import market share of 4.91%, Vietnam of 4.35%, and State

Others < 3%, namely 10.66%.

## F. INFORMATION ON THE APPLICANT'S LOSSES

**Table 6. Applicant Performance Indicators**

No	Description	Unit	Year			Growth (%) 2020-		Trends 2020-2022 (%)
			2020	2021	2022	2021	2021-2022	
1	Production	Index	100	103.14	96.42	3.14	(6.51)	(1.80)
2	Domestic Sales	Index	100	92.26	86.27	(7.74)	(6.49)	(7.12)
3	Productivity	Index	100	113.75	109.66	13.75	(3.60)	4.72
4	Used Capacity	Index	100	103.14	96.42	3.14	(6.51)	(1.80)
5	Advantages / Disadvantages	Index	100	32.15	23.94	(67.85)	(25.53)	(51.07)
6	Labor	Index	100	90.67	87.93	(9.33)	(3.02)	(6.23)
7	Ending Inventory	Index	100	79.35	104.42	(20.65)	31.60	2.19

Source: Applicant, processed



## **1. Production**

During the 2020-2022 period, the Applicant's production decreased by trend of 1.80%. In 2020 the Applicant's production was 100 points index, increased to 103.14 index points or amounting to 3.14% in 2021. Next in 2022, production Applicants experienced a decrease of 6.51% due to the decline production there is a decrease in demand for the products produced because imported goods flood the domestic market.

## **2. Domestic sales**

Domestic sales during the 2020-2022 period experienced a decline with trend of 7.12%. In 2020 domestic sales amounted to 100 points index, decreased to 92.26 index points or 7.74% in 2021. In 2022 domestic sales will experience again the decline was 86.27 index points or 6.49%. Matter This was caused by the flood of imported goods which dominated domestic market.

## **3. Productivity**

In 2020, productivity was 100 index points, experienced an increase of 113.75 index points or 13.75% in 2021. Furthermore, in 2022, productivity will experience the decline was 109.66 index points or 3.60%. During for the 2020-2022 period, productivity has increased with a trend of 4.72%. This increase was due to a large reduction in numbers labor.

## **4. Used Capacity**

During the 2020-2022 period, the Applicant's used capacity decreased with a trend of 1.80% caused by a surge in the number of imports during that period. In 2020, used capacity was 100 index points, has increased to 103.14 index points in 2021. Furthermore, in 2022, the used capacity will decrease to amounting to 96.42 index points.

## **5. Advantages/Disadvantages**

The applicant experienced a decrease in profits with a trend of 51.07%

during the 2020-2022 period. In 2020, the Applicant's profit amounted to 100 index points and then in 2021 the Applicant experiences a decrease in profits of 67.85% compared to the year previously. In 2022, the applicant will experience another decline a gain of 23.94 index points. Decrease in profits due to reduced domestic sales in the same year and increasing number of imports of these products.

## 6. Labor

There has been a reduction in the number of workers with a trend of 6.23% during the 2020-2022 period. In 2020 the number of workers will be 100 index points, decreased to 90.67 index points or 9.33% in 2021. Then in 2022, the amount labor decreased to 87.93 index points.

## 7. Ending Inventory

During the 2020-2022 period, ending inventories increased by trend of 2.19%. In 2020, ending inventory was 100 points index, decreased to 79.35 index points or amounting to 20.65% in 2021. Next in 2022, inventory The final increase was 104.42 index points or amounting to 31.60%.

## G. Market Share

**Table 7. National Consumption, Domestic Sales Number of Imports, Market Share**

No	Indicator	Unit	2020	2021	2022	Change (%)		Trend 2020-2022 (%)	
						2020-2021	2021-2022		
1	National Consumption	Index	100	101.50	97.15	1.50	(4.29)	(1.43)	
2	Domestic Sales Applicant	Index	100	92.26	86.27	(7.74)	(6.49)	(7.12)	
3	Domestic Sales Non Applicant	Index	100	101.26	96.73	1.26	(4.47)	(1.65)	
4	Number of Imports	Tons	21,976	39,678	41,978	80.55	5.80	Index	38.21
5	Market share Applicant		100	90.89	88.80	(9.11)	(2.31)	(5.77)	
6	Non Market Share Applicant	Index	100	99.76	99.57	(0.24)	(0.19)	(0.22)	
7	Import Market Share Index		100	177.88	196.61	77.88	10.53	40.22	

Source: Applicant, IDN, and BPS, processed

Applicant market share and non-applicant market share during 2020-2022 continues to decline with a trend of 5.77% and 0.22%. On the contrary The import market share during 2020-2022 will increase with the trend amounting to 40.22%. Thus, during 2020-2022 the import market share has taken over the Applicant's market share.

## H. UNEXPECTED DEVELOPMENT (*UNFORESEEN DEVELOPMENT*)

### **Diversion of Chinese export destinations due to import ban policy in**

#### **United States of America**

On June 21, 2022 the United States issued a policy for prohibits Chinese imports, especially from Xinjiang (a region of China largest producer of cotton and its derivative products) when 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 are made by force 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 implementation of these regulations causing imports of woven cotton fabric products from China in the country The United States experienced a drastic decline so that China diverting the export destination of woven fabrics from cotton to another country, is wrong one to Indonesia and causing a surge in imports seen in the table below.

**Table 8. Data on imports of cotton woven fabrics from China**

Description	Unit	Year Trend Change (%)				21-22	2022
		2020	2021	2022	(%)		
Import America United States of China	Tons	25,112	12,767	9,663	(24.31)	(37.97)	
Indonesian imports from China	Tons	15,162	29,584	33,618	13.63	48.90	

Source: Trade map

Based on table 8 above, with the existence of regulations prohibiting imports in United States from China caused a decline in imports drastically in 2022 to only 9,663 tonnes, whereas the trend is a decrease of 37.97% during 2020-2022. Furthermore, with the diversion of previous exports to the United States

into Indonesia resulting in a surge in imports in Indonesia significant in 2022 compared to 2021, namely 13.63% and the trend is increasing by 48.90%.

#### **I. WILLINGNESS TO COOPERATE**

The applicant is willing to cooperate fully throughout the investigation process in the framework of the imposition of Trade Security Measures (*Safeguards*) against the surge in the number of imports of woven cotton fabric goods.

Jakarta, 16 September 2023

  
  
**ASOSIASI PERTEKSTILAN INDONESIA**  
**INDONESIAN TEXTILE ASSOCIATION**  
**Jemmy Kartiwa**  
**Chairman**

**ANNEX 1:****IMPORTER'S NAME AND ADDRESS**

<b>NO</b>	<b>COMPANY NAME</b>	<b>ADDRESS</b>
1	PT. Ungaran Sari Garment III 2 PT. Starlight Garment Semarang	Jl. Raya Karangjati Pringapus Semarang, Central Java Jl. Kyai Poncho Sentiko Tegalpanas Semarang
3	PT. Gistex Garment Indonesia	Jl. Braga No. 106 Bandung
4	PT. Tun Hong Garment Indonesia 5 PT. Winnersumbiri Knitting Factory	Jl. Raya Pengging Banyudono Boyolali, Central Java Jl. KH. Agus Salim No. 18 Cipondoh, Tangerang
6	PT. Garmino's Core Success	Jl. Soekarno Hatta Km. 31 Semarang, Central Java
7	PT. Delami Garment Industries	Jl. Soekarno Hatta No. 571 Bandung
8	PT. Indonesia Victory Garment	Jl. Cisantri Cibatu Purwakarta West Java
9	PT. PAN Pacific Jakarta	Jl. Kalimantan Block D-27 Cilincing Jakarta
10	PT. Multi Garment Jaya	Jl. Soekarno Hatta No. 578 Bandung stones
11	PT. Pan Brothers Tbk	Mojosongo Boyolali
12	PT. Indo Taichen Textile Industry	Jl. Gatot Subroto Km. 3 Jatiuwung Tangerang
13	PT. Eco Smart Garment Indonesia	Etc. Blumbang Klego Boyolali, Central Java
14	PT. And Lyrical	Jl. Merapi 23 Ds. Banaran Sukoharjo, Central Java
15	PT. Ziben Indonesia	Jl. Raya Pendidikan Cibadung Bogor West Java
16	PT. Masterindo Jaya Abadi 17 PT. Mega Putra Garment	Jl. Soekarno Hatta No. 24 Cibuntu Bandung Jl. Pedurenan Rubber No. 240 Brass Rubber Jakarta
18	PT. Mataram Tunggal Garment 19 PT. Lucky Textile Semarang	Etc. Donoharjo Sleman Yogyakarta Jl. Coaster No. 8 Block A07-10 Tanjung Emas Semarang
20	Argo Manunggal Triasta	Jl. MH Thamrin Km. 4 Cikokol Tangerang

**NAME AND ADDRESS OF IMPORTER ASSOCIATION**

<b>NO</b>	<b>ASSOCIATION</b>	<b>ADDRESS</b>
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**

<b>NO</b>	<b>COMPANY NAME</b>	<b>ADDRESS</b>
1	Guangzhou Gutex Holdings Limited	11-14th Floor, No. 2 Fuqian Road, Yuexiu District Guangzhou, Guangdong 510030, China
2	Changzhou Laojinjuan Textile Co Ltd Room 707	Phoenix Building, No 555 Tongjiang Mid Road Xinbei District, Changzhou, Jiangsu 213022, China
3	Hebei Xindadong Textile Co Ltd	No. 21 Gongye Road, Jinzhou City Hebei 050026, China
4	Elaf (Fujian) Textile Technology Co Ltd	No. 1-2, Building B, Fufeng Commercial Town, Nanyang Road Shishi, Fujian 362700, China
5	Jiangyin City Chamber Knitting Co Ltd No 1 Zhou	Jiawan, Songqiao Yunting Street, Jiangyin Jiangsu 214400, China
6	Argus Textile Technology Co Ltd	Room C, 3rd Floor, Building 3, No 889 Yishan Road Shanghai 200233, China
7	Shaoxing Henglan Textile Co Ltd	No 117, 3/F, District B, Dongsheng Road Market Keqiao District, Shaoxing, Zhejiang 312000 China
8	Wujiang Hengjia Textile Co Ltd	No 3 North Hong An Road, North Economic Development Zone Shengze Wujiang, Jiangsu 2152228, China
9	Jiangyin First Textile Co Ltd	No. 55 Yabao Road, Shengang Town Lingang Economic Development Zone, Jiangyin Jiangsu 214443, China
10	Kayjune Company	B&K Building 4F, 25, Eonju-to 85-Gil, Gangnam- Gu, Seoul, Republic of Korea