

## 駐印度代表處經濟組 函

受文者：經濟部國際貿易署

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密等及解密條件或保密期限：

附件：如文（竺經1120001207\_Attach1.pdf、竺經1120001207\_Attach2.pdf、竺經1120001207\_Attach3.pdf、竺經1120001207\_Attach4.pdf）

主旨：有關印度商工部貿易救濟局(DGTR)針對自中國大陸及我國進口之「數位平板印刷板」(Digital Offset Printing Plates)展開平衡稅調查事，報請鈞查。

說明：

- 一、依據印度商工部貿易救濟局(DGTR)本(2023)年11月9日電郵辦理(如附件1)。
- 二、前述電郵通知相關利益團體DGTR已針對旨案展開平衡稅調查，並檢附致我代表處、出口商/製造商信函及經濟利益問卷(如附件2、3、4)。
- 三、根據DGTR信函，相關利益團體須於收到本信函日起30日內提交問卷。

正本：經濟部國際貿易署

副本：電文  
交換章  
2023/11/09  
21:09:28

**File No. 6/25/2023-DGTR**  
**Government of India**  
**Ministry of Commerce & Industry**  
**Department of Commerce**  
**Directorate General of Trade Remedies**  
**Jeevan Tara Building, 4th Floor, 5, Parliament Street, New Delhi**

**Dated:** 9<sup>th</sup> November 2023

To,

**Exporters/Producers of the subject goods of subject countries**

**Subject: Initiation of countervailing duty investigation concerning imports of ‘Digital Offset Printing Plates’ originating in or exported from China PR and Taiwan.**

Sir,

I am directed to inform you that a countervailing duty investigation concerning imports of ‘**Digital Offset Printing Plates**’ originating in or exported from **China PR and Taiwan** has been initiated by the Designated Authority constituted under the Customs Tariff Act, 1975 in respect of the aforementioned subject matter to investigate into the existence, degree and effect of alleged subsidies. A copy of the Initiation Notification No. 6/25/2023-DGTR dated 29.09.2023 issued by the Authority is available at

[https://www.dgtr.gov.in/sites/default/files/Initiation%20Notification\\_DOPP\\_CVD\\_English.pdf](https://www.dgtr.gov.in/sites/default/files/Initiation%20Notification_DOPP_CVD_English.pdf)

2. The period of investigation (POI) adopted by the Authority for the present investigation is 1<sup>st</sup> April – 2022 to 31<sup>st</sup> March 2023 (12 months). The injury investigation period covers the periods 1<sup>st</sup> April 2019 – 31<sup>st</sup> March 2020, 1<sup>st</sup> April 2020 – 31<sup>st</sup> March 2021, 1<sup>st</sup> April 2021 – 31<sup>st</sup> March 2022 and the POI.
3. As per the available records, you are an exporter/producer of the subject goods. You may, therefore, be interested in participating in the investigation. The Authority, therefore, provides you an opportunity to defend your interests and assist the Authority to arrive at a fair decision and thus requests you to file your response to the Exporter’s Questionnaire available at: <https://www.dgtr.gov.in/sites/default/files/Subsidy-Exporter%27s%20Questionnaire.pdf>
4. The purpose of the questionnaire is to gather information required for the completion of the instant investigation. It is important for your company to give the answers clearly and precisely, indicating the sources of information used, and wherever required, attaching supporting documents. Any worksheets or documents used to answer this questionnaire, which by any reason cannot be attached, shall be kept in the hands of the company and be made available for the purposes of further examination/verification.
5. Although the questionnaire is prescribed as mentioned in Para 3 of this letter, the Designated Authority reserves the right to call for any information in this regard at any time during the investigation and the course of anti-subsidy proceedings. You may also submit any additional information relevant in this regard.

6. The response must be in English and all supplementary information or other material provided with it must also be in English or accompanied by an English translation and must be certified by the Chief Executive of your company as accurate, complete and presenting a true and fair view of the accounts and other data to the best of his knowledge and belief.
7. We request you to give careful consideration to the questionnaire, particularly to the question concerning merchandise characteristics. Specifically, we need to know the difference, if any, between the merchandise sold in your home market or in a third country and that sold in India.
8. The exporter must also provide information regarding its related corporate entities in India along with information regarding its sales in the home market or third countries, wherever applicable.
9. All financial information is to be indicated in the local currency. Applicable conversion rate of local currency to US Dollar for the relevant period is to be provided in each statement.
10. If your business does not perform all of the following functions in relation to the product under consideration, please provide names and address of the companies, which perform each of the following functions: -
  - a. Producers or manufactures the goods under consideration
  - b. Sells in the domestic market
  - c. Exports to India
  - d. Exports to countries other than India
11. Simultaneously the interested party concerned may be advised to furnish information to the extent they are relevant as per Para (3) of introduction to the enclosed questionnaire.
12. The information furnished is subject to verification. You are, therefore, requested to convey your willingness to offer yourself for any verification by the Authority as per the attached proforma. You are also advised to preserve all the working papers for such verification.
13. Any information relating to the present investigation should be e-mailed to the investigation team members at [adg14-dgtr@gov.in](mailto:adg14-dgtr@gov.in), [dd11-dgtr@gov.in](mailto:dd11-dgtr@gov.in), [adv13-dgtr@gov.in](mailto:adv13-dgtr@gov.in), [dd16-dgtr@gov.in](mailto:dd16-dgtr@gov.in).
14. In case you wish to appoint a person/firm to represent your interests, you may please issue a proper authorization in favour of such person/firm.
15. If no response is received within the time stipulated in this letter, it would be presumed that you have no comments to offer. Your attention is specifically drawn to the Anti-Subsidy Rules, which authorize the Designated Authority to record its findings on the basis of facts available to it in case of non-cooperation from the interested parties.
16. **Confidential Information:** The answer to the questionnaire must be submitted in two versions: one confidential version and another non-confidential version. It must be ensured that all the information supplied is clearly marked either “confidential” or “non-confidential” at the top of each page. Information supplied without any mark shall be treated as non-confidential and the Authority shall be at liberty to allow the other interested parties to inspect any such non-confidential information. Confidential information must be accompanied by a non-confidential summary. The non-confidential summary must be in sufficient detail to permit a reasonable understanding of the substance of the information furnished on confidential basis. However, in exceptional circumstances, the party submitting the confidential information may indicate that such information is not susceptible to summary, and a statement of reasons containing a sufficient and adequate explanation

in terms of Rule 8 of the CVD Rules, 1995 and appropriate trade notices issued by the Authority, as to why such summarization is not possible, must be provided to the satisfaction of the Authority. However, if the Authority is satisfied that the request for confidentiality is not warranted, or the supplier of the information is either unwilling to make the information public or to authorize its disclosure in a generalized or summary form, the Authority may disregard such information. A list of interested parties will be uploaded on DGTR's website. Copies of all non-confidential submissions by an interested party should be shared by e-mail with all other interested parties participating in the investigation.

17. With respect to the non-confidential version of the application being shared along with this letter, the exporter/producer may file comments on the claims of confidentiality **within 7 days** and on the scope of the product under consideration, if any, and propose product control numbers (PCNs), if any, within **15 days from the date of this letter.**
18. The exporter/ producer must file the questionnaire response within **30 days from the date of this letter**. It is also requested that the exporter/ producers may visit the website of DGTR regularly for any updates.
19. As per Rule 7(6) of the Customs Tariff (Identification, Assessment and Collection of Countervailing Duty on Subsidized Articles and for Determination of Injury Rules, 1995) the Designated Authority may allow an interested party or its representative to present the information relevant to the investigation orally but such oral information shall be taken into consideration by the Designated Authority only when it is subsequently reproduced in writing.” Please send an e-mail request in advance if you desire a hearing at the email addresses mentioned in Para 13 above within 30 days from the date of issue of this communication.
20. All of your submissions including the data and annexure to the questionnaire response and the worksheets included in this Questionnaire must be submitted in *searchable computerized medium/soft copy format (MS Word, MS Excel, and PDF as per the data type)*. All submissions should be in accordance with the requirements laid down in the relevant trade notices in this respect.
21. You may contact this office should you need any clarification and/or assistance in furnishing the information in the prescribed manner.
22. We would appreciate your cooperation in providing the requisite information within the required time and in assisting us in conducting the present investigation in a time bound manner.
23. The unit of measurement in the present investigation is in Sq. Meters (SQM) Therefore, the information needs to be supplied in Sq. Meters (SQM) as unit of measurement. In case the information is supplied in any other unit of measurement, it should be converted into an equivalent unit of measurement clearly showing the appropriate calculation methodology.



(Vivek Singh)  
Joint Director

Tel No.: 011-23408708

Email: [dd11-dgtr@gov.in](mailto:dd11-dgtr@gov.in)

**REFERENCE:**

1. Initiation Notification  
[https://www.dgtr.gov.in/sites/default/files/Initiation%20Notification\\_DOPP\\_CVD\\_English.pdf](https://www.dgtr.gov.in/sites/default/files/Initiation%20Notification_DOPP_CVD_English.pdf)
2. Exporter Questionnaire  
<https://www.dgtr.gov.in/sites/default/files/Subsidy-Exporter%27s%20Questionnaire.pdf>
3. Economic Interest Questionnaire (attached with this letter)
4. Non-confidential version of the application (attached with this letter)

# **ECONOMIC INTEREST QUESTIONNAIRE**

**for [AD/CVD] INVESTIGATION  
against (Name of the subject  
countries)**

**in respect of [*NAME OF Product  
Under Consideration or PUC*]**

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### **PART-I. GENERAL SECTION <sup>1</sup>(FOR ALL STAKEHOLDERS INCLUDING ADMINISTRATIVE/LINE MINISTRY)**

1. Name and details of the company/association/consumer group/others:

- a. Name
- b. Address
- c. Name and designation of contact person
- d. Contact No.
- e. Email address
- f. Website
- g. Contact Details of legal representative, if any.

2. Status of the interested party (tick the relevant cell among the following).

Government body		Importer	
Domestic producer		Distributor or dealer	
Trader		Consumer	
Downstream user		Association of PUC	
Upstream producer		Association of Downstream Products	
Consumer groups		Association of Upstream Products	
Exporter/Producers		Others (specify)	

Note-1: Provide the relevant details as deemed fit.

3. If you are any association as mentioned above, provide the following details:

- (a) Is the Association a registered body? If so a copy of the Registration Certificate;
- (b) A copy of the By-laws & Memorandum of Association (MOA);
- (c) A list of the members;
- (d) Details of the Executive body / Managing structure of the Association;
- (e) A copy of the minutes of the meeting in which it was resolved by the Association to file this questionnaire response on behalf of some/all its members;
- (f) A list of the members, who either supported, opposed or remained neutral with regard to the said response; and
- (g) Any other information which may be relevant in this regard.

4. Whether your industry consists majorly of Micro, Small and Medium Enterprises (MSMEs).<sup>2</sup> If yes, in case of Indian producer (whether domestic industry/ importer/ user), provide your relevant MSME certificate or in case of association, declare how many members of the association have MSME certificate.

5. Explain how the alleged dumping, subsidization, increased imports or imposition of duty has affected your company's operations. Please quantify such impact.

<sup>1</sup> Please fill N.A. (not applicable), wherever applicable.

<sup>2</sup> For the meaning and definition of "MSME", the relevant notifications/circulars issued by the Central Government in this regard shall apply.

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6. Indicate any non-tariff barriers for the PUC or its immediate downstream product in India.
  7. Substantiate how the duty on PUC, if levied, is likely to impact the downstream users and final consumers of the PUC. Please substantiate such impact in terms of increase in the cost and price of the immediate downstream product and eventual end product. Please provide relevant calculation and supporting evidence.
  8. Provide the number of employees involved in the production of the PUC/ downstream/ upstream product, as applicable.
  9. Provide details of whether any trade remedial measures exist or are proposed on any upstream, downstream, joint, substitute or otherwise related products in India or outside, which might impact your operations or the operations of the downstream user industry.
  10. Provide any other information that may be relevant for the present investigation.
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### **PART-II. ADMINISTRATIVE / LINE MINISTRY**

1. Name of the Administrative Ministry
  2. Provide the name of the product, to which the administrative ministry belongs, and also provide the following details relating to such product:
    - (a) Category (PUC/Downstream/upstream)
    - (b) Total estimated production and
    - (c) No. of estimated producers of the product.
    - (d) The impact on such product (please quantify) in case the duty is levied on the PUC
  3. Whether the Ministry support or oppose the duty on PUC and reasons for the same.
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### PART-III. DOMESTIC PRODUCERS

1. Provide evidence regarding the prevailing prices of the PUC in the market. Also provide details of how the prices of the PUC have evolved in the last 5 years, including but not limited to the comparison to cost of production.
2. Indicate whether the industry for the PUC is majorly located in a particular geographical region. Please explain the impact thereof on the user industry. Provide information for the following zones of India:

S. No.	Parameters	North	South	East	West	Central	North-East	Total
1	Installed Capacity							
2	Production							
3	Consumption							
4	Imports							

3. Provide the % utilisation of the PUC in the immediately downstream product.
  4. Re-sale price of the imported PUC at retail level in India.
  5. Provide any other information that may be relevant for the present investigation.
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### PART-IV. IMPORTERS AND / OR DOWNSTREAM USERS

1. (a) Indicate whether you have entered into any long-term contracts with the suppliers of the PUC in India as well as internationally.  
  
(b) Also specify whether you can switch suppliers in case of imposition of duty on PUC. If not, specify the reasons for your inability to switch suppliers.  
  
(c) Clarify as to whether the finished products produced by your company has a substitute. Also indicate whether it is likely that consumers would switch to another product in case the cost of your product increases due to the imposition of the duty on PUC, if levied.
2. Substantiate with calculations whether the downstream industry would bear or pass on the increase in the costs due to the duty on PUC, if levied.
3. Substantiate as to how the duties on the PUC (previous duties in place or duties, if levied on the PUC pursuant to the present investigation) imported from subject country or other countries have impacted the costs and prices of the Downstream Product during IIP:

S. No.	Parameter	Unit	Year 1	Year 2	Year 3	POI
1	Consumption of the PUC in the finished product					
a	Volume					
b	Value					
2	Production of the Finished product					
a	Volume					
b	Value					
3	% Share of PUC in finished product					
4	Quantum of ADD paid					
5	Impact of ADD paid on finished product in absolute terms					
6	Impact of ADD paid on finished product as % of price of the finished product					
7	Return on Investment (%)					

Note: "ADD paid" here means ADD currently in place (in case of SSR) or ADD in the present investigation (if suppose 10% is proposed, for example)

4. Provide evidence regarding the prevailing prices of the PUC in the market. Also provide details (with its contributing factors) of how the prices of the PUC have evolved during the IIP. Evidence may include invoices, price lists, discounts given, actual prices paid over the IIP, contracts signed with domestic or foreign suppliers.
5. Substantiate whether the demand of the PUC is highly price-sensitive. If you consider that there are factors other than price [e.g. Costs & expenses, supply-side (low demand due to higher degree of buyer's market), seller's market, consumer perceptions, competition and/or the like] that have impacted your purchase decisions, list the same and substantiate with relevant evidence.

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6. Provide details whether the production technology used by the PUC-producers in India is inefficient/ obsolete. Whether difference in the technology has led to PUC being unviable? Please provide evidence.
7. Provide details of any future investments or expansions or forecasted changes that your company and the Indian industry consuming the PUC in India is planning in the next five years with regards to PUC.

<b>Name of such Producer</b>	<b>Expected capacity (MT)</b>	<b>Expected timeline (months)</b>	<b>Expected Investment (Rs. Cr.)</b>	<b>Desired return on investment (Rs. Cr. or %)</b>

*Note: For the above table, specify the basis of indicating the desired return on investment.*

8. Specify whether the downstream user industry for the PUC is majorly located in a particular geographical region. Please explain the impact thereof on the user industry. Provide information for the following zones of India:

<b>S. No.</b>	<b>Parameters</b>	<b>North</b>	<b>South</b>	<b>East</b>	<b>West</b>	<b>Central</b>	<b>North-East</b>	<b>Total</b>
1	Installed Capacity							
2	Production							
3	Consumption							
4	Imports							

9. Provide details of alternate sources of supply of the PUC
10. Provide information along with evidence whether you are aware of any anti-competitive or customer discriminatory behaviour adopted by the producers in India.
11. Provide details of whether you anticipate any supply shortages of the PUC in the near future due to prioritization of certain market segments (captive consumption, related sales, domestic market, export obligations, etc.) by the domestic producers of PUC.
12. Provide details of country-wise exports made by your company (volume and value) during the IIP. Also specify whether such exports can be made using duty exemption or remission schemes. If the PUC was imported for production of your product, specify whether the import was made using duty exemption or remission schemes. If duty exemption or remission schemes was not used, elaborate reason for the same. Please quantify the amount of duty benefit in case of purchase under advance license. If the Govt. of India has specified Duty DrawBack rate (DDB) for your product, please specify the current rate of DDB.
13. Provide details of any interruptions in the domestic production of the PUC in the last four years. Please substantiate whether such interruptions impacted the cost and price of the PUC along with relevant evidence or calculations. Also indicate forecasted

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factors (currency fluctuation, raw material shortages, government policy, shutdown, closure, etc.) that may affect production in the future.

14. Provide details of whether any related industry is likely to be impacted due to the imposition of duty on PUC, if levied.
  15. Provide any other information that may be relevant for the present investigation.
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### PART-V. UPSTREAM INDUSTRY

1. Provide details of the major users of your product and their market share of the PUC.

Name and contact details of the upstream producer	Share of upstream producer in market for PUC

2. Provide the volume of sales made by your company with an estimation of the Indian industry producing the immediate upstream product of the PUC in the last four years.

Volume of Sales (MT)	Year 1	Year 2	Year 3	Year 4
Name of upstream producer				
Indian Industry producing the immediate upstream product of the PUC				

3. Indicate the % share of your product used in the PUC in total sales of your company.
4. Explain the level of your company's dependency on the domestic production of the PUC. Provide volume of sales of your product made to the Indian industry producing PUC.
5. Provide details of any future investments or expansions or forecasted changes that your company or Indian industry producing upstream product is planning in the next five years with regards to product used in PUC.

Name of such Producer	Expected capacity (MT)	Expected timeline (months)	Expected investment (Rs. Cr.)	Desired return on investment (Rs. Cr. or %)

*Note: For the above table, specify the basis of indicating the desired return on investment.*

6. Substantiate along with relevant calculations the impact of dumping of the PUC on the performance of your company and the Indian industry producing the upstream product, if any. Provide details of volume and value of sales of your product to the producers of PUC over the IIP. In case your product prices were impacted due to dumping of the PUC, substantiate the same and please quantify the impact in absolute terms and as % of the price of your product during the POI.
7. In case of Sunset Review (SSR) investigation, explain how the imposition of duties has affected operations of the upstream industry of the PUC. Please quantify such impact.

S. No.	Particulars	UOM	Year 1	Year 2	Year 3	POI
1	Production	MT				
2	Total Sales volume	MT				
a	Domestic sales	MT				

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b	Export sales	MT				
c	Captive consumption	MT				
<b>3</b>	<b>Total Sales value</b>	Rs. In Lacs				
a	Domestic sales	Rs. In Lacs				
b	Export sales	Rs. In Lacs				
c	Captive consumption	Rs. In Lacs				
<b>4</b>	<b>Profits / loss</b>	Rs. Per MT				
<b>5</b>	<b>Return on investment</b>	%				
<b>6</b>	<b>Employment</b>	Numbers				
<b>7</b>	<b>Any other parameters</b>	Please specify				

Note: Change the unit (e.g. MT) as applicable for the product

8. Provide any other information that may be relevant for the present investigation.
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### Glossary of Terms used:

- **POI:** Period of Investigation in the present investigation
- **IIP:** Injury Investigation Period (which includes POI) in the present investigation
- **PUC:** Product Under Consideration in the present investigation
- **ADD:** Anti-Dumping Duty
- **SSR:** Sunset Review Investigation
- **MT:** Metric Tonne, if applicable (alternatively the unit as applicable for the product should be used)
- **UOM:** Unit of Measurement