

## 駐印尼代表處經濟組 函

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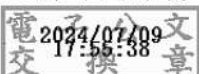
主旨：有關印尼針對自我國、中國及泰國進口之尼龍薄膜

(Nylon Film)反傾銷落日複查事，檢送印尼反傾銷委員會(KADI)提供該調查「基礎事實揭露報告」如說明，敬請查照並惠轉知我相關業者及公協會。

說明：

- 一、依據印尼反傾銷委員會(KADI)本(113)年7月8日第AD.02/346/KADI/07/2024號函(如附件)辦理，本組本年3月28日印尼經字第1130000135號函諒察。
- 二、KADI來函述及，倘利害關係人對於報告有意見，可於本年7月15日前提提交書面意見；若擬要求參加聽證會者，應於7月22日前向KADI提出申請。
- 三、檢陳KADI「基礎事實揭露報告」印尼文及英譯版如附件，倘內容有差異，請以印尼文版本為主，併請鑒參。

正本：經濟部國際貿易署

副本：

Jakarta, July 8, 2024

Our Ref. AD.02/346 /KADI/07/2024

Head Of Taipei Economic and Trade Office (TETO)  
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*Subject : Indonesia Antidumping Investigation on Nylon Film Originating from The People's Republic of China, Thailand, and Taiwan*

Dear Sir/Madam,


We wish to refer to the proceeding of Anti Dumping investigation on Nylon Film originating or exported from the People's Republic of China, Thailand, and Taiwan. Please find attached the non-confidential version of the Essential Facts ("Laporan Data Utama Penyelidikan Anti-Dumping atas Impor Produk Nylon Film yang berasal dari Republik Rakyat Tiongkok (RRT), Thailand dan Taiwan") on the mentioned investigation.

In the absence of interested parties from the Taiwan, your authorities are welcome to convey concerns to this Essential Facts. Please be noted that all written submissions should be labeled properly (confidential and non-confidential version) and submitted to KADI no later than July 15<sup>th</sup>, 2024, in hard and soft copy version.

In compliance with the Indonesian Government Regulation No.34/2011, KADI provides opportunity for a hearing. Requests for hearings must be submitted to KADI no later than July 22<sup>nd</sup>, 2024. If there is no request until the mentioned date, KADI will not arrange any public hearings.

Sincerely yours,



  
Danang Prasta Danial  
Chairman

**LAPORAN DATA UTAMA PENYELIDIKAN ANTIDUMPING  
ATAS PRODUK NYLON FILM YANG BERASAL DARI  
REPUBLIK RAKYAT TIONGKOK (RRT), THAILAND, DAN TAIWAN**

VERSI TIDAK RAHASIA

TIDAK RAHASIA

**KOMITE ANTI DUMPING INDONESIA  
KEMENTERIAN PERDAGANGAN RI**

**2024**

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## A. PENDAHULUAN

### A.1. LATAR BELAKANG

1. Komite Anti Dumping Indonesia (KADI) melakukan inisiasi penyelidikan anti dumping atas impor Nylon Film yang berasal dari Republik Rakyat Tiongkok (RRT), Thailand, dan Taiwan pada tanggal 28 Maret 2023 berdasarkan permohonan yang diajukan oleh PT Emblem Asia dan PT Kolon Ina yang selanjutnya disebut sebagai Pemohon. Pemohon merupakan Industri Dalam Negeri (IDN) yang memproduksi Nylon Film yang berdasarkan Buku Tarif Kepabeanan Indonesia (BTKI) 2022 masuk dalam pos tarif ex.3920.92.10 dan ex.3920.92.99.
2. Sesuai dengan ketentuan Peraturan Pemerintah Nomor 34 Tahun 2011 (PP 34/2011) tentang Tindakan Antidumping, Tindakan Imbalan dan Tindakan Pengamanan Perdagangan pada Pasal 13 ayat (2) huruf b dan *Article 6.9 Agreement on Implementation of Article VI of GATT 1994 (Anti Dumping Agreement/ADA)*, KADI menerbitkan Laporan Data Utama (*Essential Facts*) hasil penyelidikan yang akan menjadi dasar keputusan akhir hasil penyelidikan anti dumping atas impor Nylon Film.

### A.2. PROSEDUR

3. Sesuai Pasal 7 PP 34/2011 dan *Article 5.5 ADA*, pada tanggal 14 Februari 2023 KADI melakukan pre-notifikasi kepada perwakilan pemerintah RRT, Thailand, dan Taiwan di Indonesia tentang diterimanya permohonan penyelidikan antidumping atas impor Nylon Film yang berasal dari RRT, Thailand, dan Taiwan.
4. Setelah melakukan analisa bukti awal pada permohonan, KADI menetapkan bahwa permohonan telah memenuhi persyaratan penyampaian bukti-bukti awal mengenai dumping, kerugian yang dialami Pemohon, dan hubungan kausal antara keduanya sehingga dapat dilakukan inisiasi penyelidikan.
5. Pada tanggal 28 Maret 2023 KADI mengumumkan dimulainya penyelidikan antidumping atas produk Nylon Film yang berasal dari RRT, Thailand, dan Taiwan melalui Harian Bisnis Indonesia. Pengumuman tersebut disampaikan secara resmi kepada seluruh pihak yang berkepentingan dengan disertai

pengiriman kuesioner kepada industri dalam negeri, eksportir/eksportir produsen, dan importir yang diketahui. KADI juga memberikan kesempatan 40 (empat puluh) hari untuk menjawab kuesioner terhitung mulai dari tanggal pengiriman serta memberikan kesempatan untuk menyampaikan tanggapan tertulis dan mengajukan dengar pendapat (*hearing*) kepada pihak yang berkepentingan.

6. Pihak yang berkepentingan yang diketahui dalam permohonan adalah:

a. Eksportir/Eksportir Produsen RRT

- 1) Kunshan Yuncheng Plastic Industry Co., Ltd.
- 2) Xiamen Changsu Industrial Co., Ltd
- 3) Cangzhou Donghong Packing Material Co., Ltd
- 4) Foshan Plastics Group Co., Ltd (FSPG)
- 5) Huan Yuang Plastic Film
- 6) Qingdao Kingchuan Yuanrong International Trading Co., Ltd.
- 7) Olunro Corporation
- 8) Anhui Eastern Communication Group
- 9) Xiamen Best Resource Foreign Trade Co., Ltd
- 10) Wenzhou Ruiyann Industry Co., Ltd
- 11) Shanghai Plastech International Trading Co., Ltd
- 12) Zhejiang Haibin Film Technology Co., Ltd
- 13) Hebei Nieshang Trade Co., Ltd.
- 14) Hyosung Chemical (Jiaxing) Co., Ltd.

b. Eksportir/Eksportir Produsen Thailand

- 1) A.J. Plast Public Company Limited
- 2) Thaipolyamide Co., Ltd.
- 3) Thailon Techno Fiber Limited
- 4) One Stop Pack Company Limited
- 5) Thai Toray Synthetics Company Limited
- 6) Thai Polymer Supply Co., Ltd.
- 7) Asia Fiber Public Company Limited (AFC)

c. Eksportir/Eksportir Produsen Taiwan

- 1) Torai International Taipei Inc.

- 2) Li Ling Film Co., Ltd.
- 3) Pai Huey Plastic Industry
- 4) Zig Sheng Industrial Co., Ltd
- 5) Chia Chyi Matrix Tech Inc.
- 6) Nan Ya Plastics Corporation

d. Importir

- 1) PT Surya Sukses Mandiri
- 2) PT Karunia Indah Perdana
- 3) PT Panverta Cakrakencana
- 4) CV. Indopack Sejahtera
- 5) PT International Packaging Manufacturing
- 6) PT Aneka Jasuma Sejahtera
- 7) PT Plastindo Lestari
- 8) PT Cipta Rama Kamasindo
- 9) PT Supernova Flexible Packaging
- 10) PT Lumina Packaging
- 11) PT Toray International Indonesia
- 12) PT Surabaya Perdana Rotopack
- 13) PT Buana Chandra Mandiri
- 14) PT Utomo Print Sukses
- 15) PT Megasetia Agung Kimia
- 16) PT Colorpack Flexible Indonesia
- 17) PT International Packaging Manufacturing
- 18) PT Bonavista Polypack
- 19) PT Suryakemasindo Sejati
- 20) PT Surya Sukses Mandiri
- 21) PT Nagamas Packaging
- 22) PT Interflex Sejahtera Perdana
- 23) Fa. Indomas

7. Periode penyelidikan dalam penyelidikan ini adalah untuk kerugian meliputi 1 Juli 2018 s.d 30 Juni 2019 (P1), 1 Juli 2019 s.d 30 Juni 2020 (P2), 1 Juli 2020



s.d 30 Juni 2021 (P3), 1 Juli 2021 s.d 30 Juni 2022 (PP), sedangkan untuk periode penyelidikan (PP) dumping adalah 1 Juli 2021 s.d 30 Juni 2022 (PP).

8. Sesuai resital 5, KADI memberikan batas waktu penyampaian jawaban kuesioner kepada masing-masing pihak yang berkepentingan. Sampai dengan batas waktu yang ditentukan, para pihak yang menyampaikan jawaban kuesioner adalah:

a. Industri Dalam Negeri:

- 1) PT Emblem Asia
- 2) PT Kolon Ina

b. Eksportir Produsen RRT:

- 1) Kunshan Yuncheng Plastic Industry Co. Ltd
- 2) Yuncheng Qilong New-Material Co. Ltd
- 3) Yuncheng Heshan New Material Co. Ltd
- 4) Hyosung Chemical Fiber (Jiaxing) Co. Ltd.
- 5) Hyosung Chemical Corp.
- 6) Xiamen Changsu Industrial Co., Ltd

c. Eksportir Produsen Thailand:

- 1) A.J. Plast Public Company Limited

d. Importir:

- 1) PT Plasindo Lestari
- 2) PT Aneka Jasuma Sejahtera
- 3) PT Surya Sukses Mandiri
- 4) PT Supernova Flexible Packing
- 5) PT Surabaya Perdana Rotopack
- 6) PT Panverta Cakrakencana

9. KADI telah melakukan verifikasi lapangan ke lokasi:

a. Industri Dalam Negeri:

- 1) PT Emblem Asia, pada tanggal 13 s.d 15 November 2023
- 2) PT Kolon Ina, pada tanggal 8 s.d 10 November 2023

b. Eksportir Produsen RRT:

- 1) Kunshan Yuncheng Plastic Industry Co. Ltd.: 2 s.d 4 Desember 2023
- 2) Yuncheng Qilong New-Material Co. Ltd.: 27 s.d 28 November 2023

- 3) Yuncheng Heshan New Material Co. Ltd.: 29 November s.d 1 Desember 2023
  - 4) Hyosung Chemical Fiber (Jiaxing) Co. Ltd.: 30 November s.d 3 Desember 2023
  - 5) Hyosung Chemical Corp: 30 November s.d 3 Desember 2023
  - 6) Xiamen Changsu Industrial Co., Ltd.: 27 s.d 29 November 2023
- c. Eksportir Produsen Thailand yaitu A.J. Plast Public Company Limited, pada tanggal 12 s.d 14 Desember 2023

10. Berdasarkan Pasal 9 ayat (2) PP 34/2011 dan *Article 5.10 ADA*, pada tanggal 27 Maret 2024 KADI memperpanjang masa penyelidikan.

## B. PENYELIDIKAN

### B.1. BARANG YANG DISELIDIKI DAN BARANG SEJENIS

11. Barang yang diselidiki adalah Nylon Film (tidak termasuk pelat dan lembaran) yang berasal dari RRT, Thailand, dan Taiwan yang termasuk dalam pos tarif ex.3920.92.10 dan ex.3920.92.99 berdasarkan PMK No 26/PMK.010/2022 tentang Penetapan Sistem Klasifikasi Barang dan Pembebanan Tarif Bea Masuk Atas Barang Impor. Uraian barang dari 2 (dua) pos tarif diatas adalah:

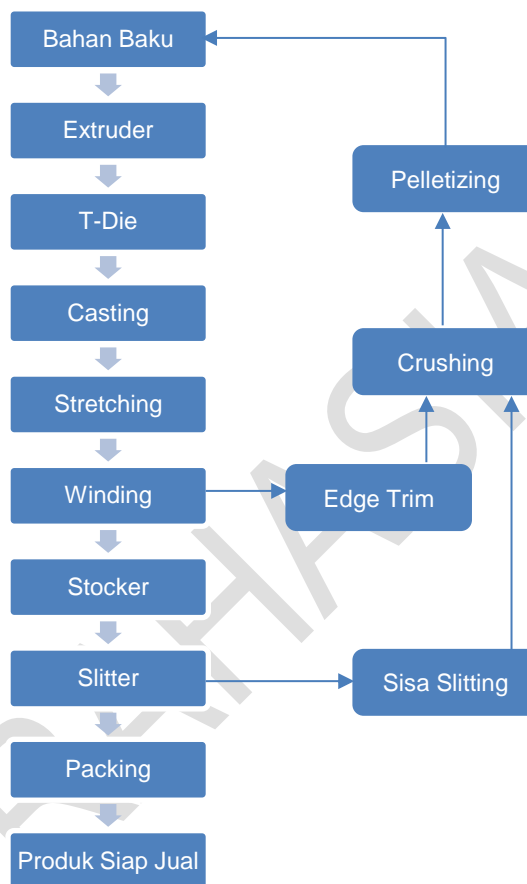
**Tabel 1. Uraian Barang Nylon Film**

Nomor HS	Uraian Barang
3920	Pelat, lembaran, film, foil dan strip lainnya, dari plastic, non seluler dan tidak diperkuat, tidak dilaminasi, tidak didukung atau tidak dikombinasi dengan cara semacam itu dengan bahan lain.
3920.92	- Dari plastik lainnya:
3920.92	-- Dari poliamida:
ex.3920.92.10	--- Dari poliamida-6
	--- Lain-lain:
ex.3920.92.99	---- Lain-lain

Sumber: BTKI 2022

## Proses Produksi

12. Berikut ini adalah proses produksi Nylon Film:



Gambar 1. Proses Produksi Nylon Film

- Extruder (Pelelehan):** bahan baku berbentuk chip dicampur dan dilelehkan menjadi polimer.
- T-Die (Penyebaran Polimer):** lelehan polimer tersebut disebarkan menjadi bentuk lembaran plastik.
- Proses Casting:** Lelehan polimer yang sudah berbentuk plastik didinginkan secara mendadak agar menjadi kaku.
- Proses Stretching:** Lembaran plastik yang sudah kaku ditarik kedua arah hingga plastik menjadi lebih tipis dan menjadi lebih stabil dan berbentuk film.
- Winding dan Edge Trim:** film yang sudah terbentuk kemudian di potong pinggirannya dan digulung pada gulungan besar. Sisa potongan akan diproses untuk dijadikan bahan *recycle*.

- f. **Proses Stocking:** Gulungan besar film disimpan di dalam *stocker* sebelum diproses *slitting*.
  - g. **Proses Slitting:** Gulungan besar film kemudian di potong (*slit*) untuk menjadi ukuran roll yang lebih kecil sesuai dengan pesanan pelanggan, sedangkan sisa potongan yang tidak terpakai diproses untuk bahan *recycle*.
  - h. **Proses Packaging:** roll ukuran sesuai dengan pesanan kemudian dikemas dan produk siap untuk dijual dan dikirim kepada pelanggan.
  - i. **Crushing:** bahan *recycle* dari proses *edge trim* dan *slitting* dihancurkan (dicacah) dan dibuat pellet agar membentuk chip dan dikembalikan sebagai bahan baku *recycle*.
13. Teknologi yang digunakan oleh industri dalam negeri untuk memproduksi Nylon Film tidak berbeda dengan teknologi yang digunakan oleh eksportir produsen dari negara yang dituduh dalam memproduksi Nylon Film.

## B.2. INDUSTRI DALAM NEGERI DAN *STANDING PETITIONER*

Tabel 2. Produksi Nylon Film

No.	Indikator	%
1.	PT Emblem Asia	58
2.	PT Kolon Ina	42
<b>3.</b>	<b>Total Produksi IDN</b>	<b>100</b>
4.	Total Produksi industri dalam lainnya	0
<b>5.</b>	<b>Total Produksi Nasional</b>	<b>100</b>

Sumber: IDN, diolah

14. Berdasarkan Tabel 2 di atas, total produksi Pemohon sebesar 100% dari total produksi nasional, dengan demikian Pemohon sudah memenuhi persyaratan mewakili IDN yang tertuang dalam Pasal 4 ayat (3) dan Pasal 6 ayat (1) (a) PP 34/2011 serta *Article 5.4 ADA*.

### B.3. PASAR DOMESTIK BARANG YANG DISELIDIKI

15. Sesuai dengan PMK No.43/PMK.010/2022 tentang Penetapan Tarif Bea Masuk dalam rangka Persetujuan Perdagangan Barang Antar Negara-Negara Anggota Perhimpunan Bangsa-Bangsa Asia Tenggara (*ASEAN Trade in Goods Agreement*) dan PMK No. 46/PMK.10/2022 tentang Penetapan Tarif Bea Masuk Dalam Rangka Persetujuan Perdagangan Barang Dalam Persetujuan Kerangka Kerja Mengenai Kerja Sama Ekonomi Menyeluruh Antar Perhimpunan Bangsa-Bangsa Asia Tenggara dan Republik Rakyat Tiongkok (*ASEAN-China Free Trade Area*) besaran tarif bea masuk impor untuk Nylon Film adalah sebagai berikut:

**Tabel 3. Uraian Barang dan Tarif Bea Masuk**

Nomor HS	Uraian Barang	ACFTA	ATIGA	MFN
3920	Pelat, lembaran, film, foil dan strip lainnya, dari plastic, non seluler dan tidak diperkuat, tidak dilaminasi, tidak didukung atau tidak dikombinasi dengan cara semacam itu dengan bahan lain.			
3920.92	- Dari plastik lainnya:			
3920.92	-- Dari poliamida:			
3920.92.10	--- Dari poliamida-6	25%	0%	10%
	--- Lain-lain:			
3920.92.99	---- Lain-lain	30%	0%	25%

16. Tabel 4 di bawah ini menunjukkan perkembangan konsumsi nasional Nylon Film di Indonesia yang diperoleh dari total impor dan volume penjualan Industri Dalam Negeri. Selama periode penyelidikan, konsumsi nasional Nylon Film mengalami peningkatan dengan tren sebesar 6,79%. Pada periode yang sama pangsa pasar IDN justru mengalami penurunan dengan tren sebesar 5,61%, namun impor Nylon Film dari negara yang dituduh dumping mengalami kenaikan dengan tren sebesar 11,89%. Jika dilihat per masing-masing negara dumping, pangsa impor RRT, Thailand, dan Taiwan mengalami peningkatan dengan tren masing-masing sebesar 4,51%, 9,94%, dan 356,90%.

**Tabel 4. Perkembangan Konsumsi Nasional Nylon Film**

Indikator	Pangsa (%)				
	P1	P2	P3	PP	Tren
<b>Negara Dumping</b>	<b>33,45</b>	<b>41,38</b>	<b>46,54</b>	<b>46,78</b>	<b>11,89</b>
RRT	23,34	28,10	32,43	25,77	4,51
Thailand	10,03	12,88	11,60	14,24	9,94
Taiwan	0,08	0,40	2,50	6,76	356,90
<b>Negara Lain</b>	<b>9,31</b>	<b>6,94</b>	<b>7,00</b>	<b>4,30</b>	<b>(20,65)</b>
<b>Total Impor</b>	<b>42,77</b>	<b>48,33</b>	<b>53,53</b>	<b>51,08</b>	<b>6,56</b>
Penjualan IDN	57,23	51,67	46,47	48,92	(5,61)
Penjualan idn Lainnya	-	-	-	-	-
<b>Konsumsi Nasional*</b>	<b>100,00</b>	<b>100,00</b>	<b>100,00</b>	<b>100,00</b>	-
<b>Konsumsi Nasional**</b>	<b>100,00</b>	<b>116,17</b>	<b>117,15</b>	<b>124,15</b>	<b>6,79</b>

Sumber: Badan Pusat Statistik; Jawaban Kuesioner IDN. Diolah.

Keterangan:

\*) merupakan share pangsa pasar dengan data konsumsi nasional sebagai data acuan

\*\*\*) merupakan perkembangan konsumsi nasional yang menggunakan data P1 sebagai acuan data perbandingan

#### B.4. TINGKAT KERJA SAMA

17. Berdasarkan jawaban kuesioner yang diterima oleh KADI, ditemukan bahwa tingkat kerja sama dari eksportir dan/atau produsen Nylon Film yang berasal dari RRT yang menjawab kuesioner sebesar 90,82% bila dibandingkan dengan volume impor Nylon Film yang berasal dari RRT yang masuk ke Indonesia. Dengan demikian, untuk perusahaan lainnya yang tidak kooperatif atau yang tidak diketahui di dalam penyelidikan (*residual duty*), dikenakan margin dumping tertinggi dari perusahaan yang kooperatif.
18. Berdasarkan jawaban kuesioner yang diterima oleh KADI, ditemukan bahwa tingkat kerja sama dari eksportir dan/atau produsen Nylon Film yang berasal dari Thailand yang menjawab kuesioner sebesar 66,77% bila dibandingkan dengan volume impor Nylon Film yang berasal dari Thailand yang masuk ke Indonesia. Dengan demikian, untuk perusahaan lainnya yang tidak kooperatif atau yang tidak diketahui di dalam penyelidikan (*residual duty*), dikenakan margin dumping berdasarkan nilai normal tertinggi dan harga ekspor terendah dari perusahaan yang kooperatif di Thailand.

19. Berdasarkan jawaban kuesioner yang diterima oleh KADI, ditemukan bahwa tidak ada satupun eksportir dan/atau produsen Nylon Film yang berasal dari Taiwan yang menjawab kuesioner. Dengan demikian, besaran margin dumping untuk Taiwan didasarkan pada nilai normal tertinggi dan harga ekspor terendah dari data yang dimiliki oleh KADI.

## **B.5. PENENTUAN MARGIN DUMPING**

20. Dalam melakukan perhitungan margin dumping, KADI menggunakan data yang diperoleh dari jawaban produsen atau eksportir produsen yang dikenakan BMAD sebagaimana disampaikan dalam kuesioner. Margin dumping secara umum ditetapkan berdasarkan selisih antara harga normal (harga penjualan di dalam negeri) dengan harga ekspor pada saat penyerahan dan tingkat perdagangan yang sama (harga eks pabrik).
21. Uji Profitabilitas dan Harga Pokok Penjualan (HPP)

Pada umumnya, KADI menerima pengalokasian biaya yang dilakukan oleh produsen atau eksportir produsen yang dikenakan BMAD dalam rangka pembebanan biaya dalam produk yang diselidiki, sepanjang pengalokasian tersebut mencerminkan biaya produksi, biaya penjualan dan administrasi umum yang didukung oleh data dalam laporan keuangan. Namun, apabila pengalokasian biaya tersebut dinilai tidak mencerminkan biaya yang sebenarnya, maka dilakukan penyesuaian yang dianggap wajar. Penyesuaian tersebut akan disampaikan kepada produsen atau eksportir produsen yang bersangkutan.

22. Perhitungan margin dumping yang dilakukan oleh KADI terhadap produsen atau eksportir produsen disampaikan secara terpisah kepada masing-masing produsen atau eksportir produsen sebagai lampiran dari laporan data utama ini.

### **B.5.1. Nilai Normal**

23. Nilai normal masing-masing produsen atau eksportir produsen, secara umum ditentukan berdasarkan rata-rata tertimbang dari transaksi penjualan domestik selama periode penyelidikan.

24. Nilai normal dihitung berdasarkan data yang disampaikan oleh perusahaan yang diselidiki, yaitu data penjualan dan data *allowances* yang diusulkan sebagaimana disampaikan dalam jawaban kuesioner. Penjualan dalam negeri produsen atau eksportir produsen dapat dipergunakan dalam perhitungan nilai normal apabila memenuhi persyaratan perdagangan yang wajar (*ordinary course of trade*). Nilai normal ditentukan pada saat penyerahan barang di pabrik (*ex-factory*).
25. *Allowances* yang diajukan oleh produsen atau eksportir produsen yang dapat diterima adalah yang terkait dengan biaya penjualan langsung (*direct selling expense*), dan dapat ditelusuri dalam data perusahaan terkait dengan penjualan barang yang diselidiki. Secara umum *allowances* dapat diterima jika merupakan bagian dari biaya penjualan dari barang yang diselidiki, yang umumnya diklasifikasikan dalam biaya penjualan, umum dan administrasi (*selling, general and administrative expenses*).
26. Dalam perhitungan nilai normal, data penjualan produsen atau eksportir produsen dapat digunakan apabila total volume penjualan domestik lebih dari 5% dari total volume penjualan ekspor ke Indonesia, dan apabila volume penjualan yang menguntungkan kurang dari 20% maka transaksi tersebut diabaikan dan digunakan metode konstruksi. Apabila volume penjualan yang menguntungkan lebih dari 20% sampai dengan 80%, maka hanya transaksi yang menguntungkan yang digunakan dalam perhitungan nilai normal, dan apabila lebih dari 80%, seluruh transaksi penjualan digunakan dalam perhitungan nilai normal.
27. Jika ada penjualan ekspor untuk kode kontrol barang (KKB) tertentu, namun tidak dijual di domestik, maka nilai normal dikonstruksi (*constructed normal value*) berdasarkan biaya produksi untuk KKB tertentu, biaya penjualan, biaya umum dan biaya administrasi domestik, serta keuntungan yang wajar.

#### **B.5.2. Harga Ekspor**

28. Harga ekspor bagi produsen atau eksportir produsen, ditentukan berdasarkan rata-rata tertimbang dari seluruh transaksi penjualan ekspor ke Indonesia selama Periode Penyelidikan yang telah dikurangi dengan *allowances* yang



dapat diterima dan biaya yang terkait dengan penjualan langsung yang diajukan dan diyakini kebenarannya. Harga ekspor dilakukan pada tingkat eks-pabrik.

### **B.5.3. Margin Dumping**

Analisa perhitungan margin dumping masing-masing perusahaan di negara yang dituduh adalah bersifat sementara dan hanya berdasarkan jawaban kuesioner, jawaban *deficiency letter*, hasil verifikasi dan data yang dimiliki KADI.

#### **Republik Rakyat Tiongkok (RRT)**

#### **29. Kunshan Yuncheng Plastic Industry Co., Ltd (Kunshan), Yuncheng Heshan New Material Co. Ltd (Heshan), Yuncheng Qilong New-Material Co. Ltd (Qilong)**

Kushan dan Heshan merupakan produsen terafiliasi Nylon Film di RRT yang menjual produknya dipasar domestik dan ekspor, sedangkan Qilong merupakan Perusahaan afiliasi dari Kushan dan Heshan akan tetapi hanya menjual produknya dipasar domestik.

##### **1) Nilai Normal**

Dalam perhitungan nilai normal, KADI mempertimbangkan kecukupan volume penjualan domestik dan volume penjualan yang menguntungkan. Dalam hal menghitung kecukupan volume penjualan domestik, KADI menggunakan data penjualan domestik Kushan dan Heshan.

Heshan menjual 21 KKB produk dan Kushan menjual 68 KKB produk Nylon Film yang identik yang dijual di pasar domestik dan ekspor, berdasarkan perhitungan profitability test dari masing-masing Perusahaan dihitung berdasarkan rata-rata tertimbang.

Karena syarat pengiriman (*term of delivery*) yang disampaikan adalah delivered, sehingga Perusahaan melakukan klaim biaya pengiriman sebagai allowance dan dapat diterima.

2) Harga Ekspor

Harga ekspor menggunakan data penjualan ekspor Kushan dan Heshan ke Indonesia dan telah dikurangi dengan *allowance* (penyesuaian) yang diklaim perusahaan yang dapat diterima. Setelah mengurangi harga atas seluruh transaksi penjualan dengan *allowance* diperoleh harga ekspor eks-pabrik.

3) Margin Dumping

Dengan mengurangi Nilai normal dan Harga ekspor pada level eks pabrik dan dibandingkan dengan harga CIF perolehan margin dumping untuk Kushan, Heshan, dan Qilong sebesar 8,58%.

30. **Hyosung Chemical Fiber (HCF) Co. Ltd. dan Hyosung Chemical Corp (HCC)**

HCF (RRT) merupakan produsen Nylon Film yang terafiliasi dengan HCC (Korea) yang merupakan trader pada penyelidikan ini. HCF melakukan penjualan domestik dan HCC menjual produk HCF di pasar ekspor termasuk ekspor ke Indonesia.

1) Nilai Normal

Dalam perhitungan nilai normal, KADI mempertimbangkan kecukupan volume penjualan domestik dan volume penjualan yang menguntungkan. Dalam hal menghitung kecukupan volume penjualan domestik KADI menggunakan data penjualan domestik HCF.

HCC menjual 61 tipe produk (KKB) Nylon Film ke pasar Indonesia, akan tetapi hanya 14 KKB identik dengan yang dijual oleh HCF di pasar domestik. KADI melakukan perhitungan *profitability test* atas 14 KKB identik tersebut dan diperoleh profitabilitas sebesar 87% s.d 100%. Atas 47 KKB yang tidak dijual di pasar domestik, dilakukan perhitungan nilai normal dengan metode konstruksi.

Nilai normal dari 14 KKB identik diperoleh dengan mengurangi *allowance* yang disampaikan oleh HCF yang hanya dapat diterima.

2) Harga Ekspor

Harga ekspor menggunakan data penjualan ekspor HCC ke Indonesia dan telah dikurangi dengan *allowance* (penyesuaian) yang diklaim perusahaan yang dapat diterima. Setelah mengurangi harga atas seluruh transaksi penjualan dengan *allowance* termasuk profit produsen ke trader.

3) Margin Dumping

Perhitungan margin dumping dengan mengurangi Nilai normal dan Harga ekspor pada level eks pabrik dan dibandingkan dengan harga CIF perolehan untuk HCF dan HCC, didapat margin dumping sebesar 21,93%

**31. Xiamen Changsu Industrial Co., Ltd (Xiamen)**

Xiamen merupakan eksportir produsen Nylon Film di RRT yang menjual produknya dipasar domestik dan penjualan ekspor ke Indonesia

1) Nilai Normal

Dalam perhitungan nilai normal, KADI mempertimbangkan kecukupan volume penjualan domestik dan volume penjualan yang menguntungkan. Xiamen menjual 101 tipe produk Nylon Film yang identik yang dijual di pasar domestik dan ekspor, dan berdasarkan perhitungan *profitability test* terhadap 101 tipe produk tersebut dihitung berdasarkan rata-rata tertimbang.

Nilai normal dari 101 KKB identik diperoleh dengan mengurangi *allowance* yang disampaikan oleh Xiamen yang hanya dapat diterima.

2) Harga Ekspor

Harga ekspor menggunakan data penjualan ekspor ke Indonesia dan telah dikurangi dengan *allowance* (penyesuaian) yang diklaim perusahaan yang dapat diterima. Setelah mengurangi harga atas seluruh transaksi penjualan dengan *allowance* diperoleh harga ekspor eks-pabrik.

3) Margin Dumping

Dengan mengurangi Nilai normal dan Harga ekspor pada level eks-pabrik dan dibandingkan dengan harga CIF peroleh margin dumping untuk Xiamen sebesar 40,87%.

**32. Eksportir dan/atau Eksportir Produsen Lainnya**

Untuk seluruh perusahaan lainnya selain dari perusahaan yang telah disebutkan di atas akan dikenakan besaran margin dumping yang tertinggi dari Perusahaan yang kooperatif di atas yaitu sebesar 40,87%.

**Thailand**

**33. A.J. Plast Public Company Limited (AJ Plast)**

1) Nilai Normal

Perhitungan nilai normal dilakukan dengan menggunakan data yang diperoleh dari jawaban kuesioner. Dalam melakukan penjualan domestik, dilakukan secara langsung kepada pelanggan tanpa melalui perusahaan terafiliasi. Data yang digunakan adalah data penjualan domestik AJ Plast dikurangi *allowances* yang diajukan dan dapat diterima sehingga didapatkan harga domestik eks-pabrik. Terdapat 83 KKB yang dijual di pasar domestik yang identik dengan pasar ekspor ke Indonesia.

Nilai normal dari 83 KKB identik diperoleh dengan mengurangi *allowance* yang disampaikan oleh AJ Plast yang hanya dapat diterima.

2) Harga Ekspor

Dalam melakukan penjualan ekspor ke Indonesia, dilakukan secara langsung kepada pelanggan tanpa melalui perusahaan terafiliasi maupun *trader*, sehingga perhitungan harga ekspor dilakukan dengan menggunakan data penjualan ekspor AJ Plast ke Indonesia. Harga ekspor eks-pabrik diperoleh dari harga CIF dikurangi *allowances* yang diajukan dan dapat diterima.

3) Margin Dumping

Berdasarkan hasil perhitungan serta dengan membandingkan rata-rata tertimbang nilai normal dengan harga ekspor pada tingkat perdagangan yang sama (eks-pabrik), ditemukan marjin dumping sebesar 12,23%

34. **Eksportir dan/atau Eksportir Produsen Lainnya**

Untuk seluruh perusahaan lainnya selain dari perusahaan yang telah disebutkan di atas akan dikenakan besaran margin dumping berdasarkan nilai normal tertinggi dan harga ekspor terendah dari perusahaan yang kooperatif di Thailand yaitu sebesar 37,34%.

**Taiwan**

35. Tidak ada perusahaan yang kooperatif di dalam penyelidikan, sehingga seluruh perusahaan asal Taiwan akan dikenakan besaran margin dumping berdasarkan pada nilai normal tertinggi dan harga ekspor terendah data yang dimiliki oleh KADI yaitu sebesar 77,63%.

**B.6. KINERJA INDUSTRI DALAM NEGERI**

36. Pada Tabel 5 di bawah merupakan indikator kinerja ekonomi IDN yang digunakan KADI sebagai dasar dalam menganalisa kerugian yang akan disampaikan pada resital 38-41.

37. Mengingat data kerugian IDN dan angka-angka di bawah ini bersifat sensitif secara komersial, maka disajikan dalam bentuk indeks pada Laporan Data Utama versi tidak rahasia.

**Tabel 5. Indikator Kinerja IDN**

(Indeks)

No.	Indikator	Unit	P1	P2	P3	PP	Tren (%)
1	Penjualan Dalam Negeri	MT	100	103	94	106	0,84
		USD	100	87	79	108	1,36
2	Labarugi)	USD	100	295	497	28	(28,37)
3	Harga Dalam Negeri	USD/MT	100	84	84	102	0,51
4	Harga Pokok Penjualan (HPP)	USD/MT	100	84	77	105	0,57
5	Pangsa Pasar	%	100	89	80	85	(5,57)

LAPORAN DATA UTAMA PENYELIDIKAN ANTI DUMPING ATAS PRODUK NYLON FILM YANG BERASAL DARI REPUBLIK RAKYAT TIONGKOK (RRT), THAILAND, DAN TAIWAN

(Indeks)

No.	Indikator	Unit	P1	P2	P3	PP	Tren (%)
6	Kapasitas Terpasang	MT	100	100	100	100	-
7	Utilisasi Kapasitas	%	100	97	95	91	(2,80)
8	Produksi	MT	100	97	95	91	(2,80)
9	Persediaan	MT	100	57	63	82	(4,75)
10	Tenaga Kerja	Org	100	95	97	121	5,95
11	Upah	USD	100	106	112	114	4,65
12	Produktivitas	MT/Org	100	102	98	76	(8,26)
13	Arus Kas Operasi	USD	100	96	993	186	52,29
14	<i>Return on Investment</i>	%	100	308	261	123	4,63
15	Pertumbuhan Laba	%	(100)	223	78	(108)	-
16	Kemampuan meningkatkan modal ( <i>Debt Equity Ratio</i> )	%	100	119	98	93	(4,09)

Sumber: IDN, diolah.

**Tabel 6. Penjualan Dalam Negeri, Laba Domestik, Harga Dalam Negeri dan Harga Pokok Penjualan (HPP)**

(Indeks)

No.	Indikator	Unit	P1	P2	P3	PP	Tren (%)
1	Penjualan Dalam Negeri	MT	100	103	94	106	0,84
		USD	100	87	79	108	1,36
2	Laba (rugi)	USD	100	295	497	28	(28,37)
3	Harga Dalam Negeri	USD/MT	100	84	84	102	0,51
4	HPP	USD/MT	100	84	77	105	0,57

Sumber: IDN, diolah.

38. Pada Tabel 6 terlihat bahwa selama periode penyelidikan, penjualan dalam negeri baik secara volume maupun nilai mengalami peningkatan dengan tren sebesar 0,84% dan 1,36%. Harga dalam negeri dan HPP juga mengalami peningkatan dengan tren sebesar 0,51% dan 0,54%, namun disaat yang bersamaan Laba (rugi) mengalami penurunan dengan tren sebesar 28,37%.

**Tabel 7. Pangsa Pasar, Kapasitas Terpasang, Utilisasi Kapasitas, Produksi dan Persediaan**

(Indeks)

No.	Indikator	Unit	P1	P2	P3	PP	Tren (%)
1	Pangsa Pasar	%	100	89	80	85	(5,57)
2	Kapasitas Terpasang	MT	100	100	100	100	-
3	Utilisasi Kapasitas	%	100	97	95	91	(2,80)
4	Produksi	MT	100	97	95	91	(2,80)
5	Persediaan	MT	100	57	63	82	(4,75)

Sumber: IDN, diolah.

39. Pada Tabel 7 di atas terlihat bahwa selama periode penyelidikan, kapasitas terpasang IDN tetap, namun utilisasi kapasitas, produksi, persediaan serta pangsa pasar mengalami penurunan dengan tren sebesar 2,80%, 2,80%, 4,75% dan 5,57%.

**Tabel 8. Produksi, Persediaan, Tenaga Kerja, Upah, dan Produktivitas**

(Indeks)

No.	Indikator	Unit	P1	P2	P3	PP	Tren (%)
1	Produksi	MT	100	97	95	91	(2,80)
2	Tenaga Kerja	Org	100	95	97	121	5,95
3	Upah	USD	100	106	112	114	4,65
4	Produktivitas	MT/Org	100	102	98	76	(8,26)

Sumber: IDN, diolah.

40. Pada Tabel 8 di atas terlihat bahwa selama periode penyelidikan, tenaga kerja dan upah mengalami peningkatan dengan tren sebesar 5,95% dan 4,65%, namun sebaliknya produksi dan produktivitas mengalami penurunan dengan tren sebesar 2,80% dan 8,26%.

**Tabel 9. Arus Kas Operasi, Return on Investment, Pertumbuhan Laba, dan Kemampuan Meningkatkan Modal**

(Indeks)

No.	Indikator	Unit	P1	P2	P3	PP	Tren (%)
1	Arus Kas Operasi	USD	100	96	993	186	52,29
2	<i>Return on Investment</i>	%	100	308	261	123	4,63
3	Pertumbuhan Laba	%	(100)	223	78	(108)	-
4	Kemampuan meningkatkan modal ( <i>Debt Equity Ratio</i> )	%	100	119	98	93	(4,09)

Sumber: IDN, diolah.

41. Pada Tabel 9 di atas terlihat kinerja IDN secara keseluruhan mengalami peningkatan yang ditunjukkan dengan meningkatnya arus kas operasi dan ROI yang meningkat dengan tren sebesar 52,29% dan 4,63% dan *Debt Equity Ratio* mengalami penurunan dengan tren sebesar 4,09%.

## B.7. HUBUNGAN SEBAB AKIBAT

### B.7.1. Dampak Volume

#### a. Dampak Volume Secara Absolut

Tabel 10. Perkembangan Volume Impor Nylon Film

Negara Asal	Satuan	P1	P2	P3	PP	Tren (%)
<b>Total Impor Dumping</b>	<b>MT</b>	<b>4.557,36</b>	<b>6.549,54</b>	<b>7.427,25</b>	<b>7.911,90</b>	19,49
RRT	MT	3.180,28	4.447,16	5.176,53	4.359,52	11,61
Thailand	MT	1.366,37	2.039,09	1.851,42	2.409,28	17,41
Taiwan	MT	10,72	63,29	399,31	1.143,11	387,98
<b>Negara Lainnya</b>	<b>MT</b>	<b>1.269,03</b>	<b>1.099,11</b>	<b>1.116,56</b>	<b>727,07</b>	(15,25)
<b>Total</b>	<b>MT</b>	<b>5.826,39</b>	<b>7.648,66</b>	<b>8.543,81</b>	<b>8.638,97</b>	13,80

Sumber: Badan Pusat Statistik, diolah.

42. Berdasarkan Tabel 10 di atas terlihat bahwa total impor mengalami peningkatan dengan tren sebesar 13,8%. Impor dari negara dumping mengalami peningkatan dengan tren sebesar 19,49%. Sementara itu impor dari negara lain mengalami penurunan dengan tren sebesar 15,25%.

43. Pada Tabel 11 menunjukkan perkembangan konsumsi nasional Nylon Film di Indonesia yang diperoleh dari total impor dan volume penjualan Industri Dalam Negeri. Selama periode penyelidikan, konsumsi nasional Nylon Film mengalami peningkatan dengan tren sebesar 6,79%. Pada periode yang sama pangsa pasar IDN justru mengalami penurunan dengan tren sebesar 5,61%, namun impor Nylon Film dari negara yang dituduh dumping mengalami kenaikan dengan tren sebesar 11,89%. Jika dilihat per masing-masing negara dumping, pangsa impor RRT, Thailand, dan Taiwan mengalami peningkatan dengan tren masing-masing sebesar 4,51%, 9,94%, dan 356,90%.



**b. Dampak Volume Secara Relatif Terhadap Konsumsi Nasional**

**Tabel 11. Perkembangan Pangsa Pasar**

Indikator	Pangsa (%)				
	P1	P2	P3	PP	Tren
<b>Negara Dumping</b>	<b>33,45</b>	<b>41,38</b>	<b>46,54</b>	<b>46,78</b>	<b>11,89</b>
RRT	23,34	28,10	32,43	25,77	4,51
Thailand	10,03	12,88	11,60	14,24	9,94
Taiwan	0,08	0,40	2,50	6,76	356,90
<b>Negara Lain</b>	<b>9,31</b>	<b>6,94</b>	<b>7,00</b>	<b>4,30</b>	<b>(20,65)</b>
<b>Total Impor</b>	<b>42,77</b>	<b>48,33</b>	<b>53,53</b>	<b>51,08</b>	<b>6,56</b>
Penjualan IDN	57,23	51,67	46,47	48,92	(5,61)
Penjualan idn Lainnya	-	-	-	-	-
<b>Konsumsi Nasional*</b>	<b>100,00</b>	<b>100,00</b>	<b>100,00</b>	<b>100,00</b>	-
<b>Konsumsi Nasional**</b>	<b>100,00</b>	<b>116,17</b>	<b>117,15</b>	<b>124,15</b>	<b>6,79</b>

Sumber: BPS dan IDN, diolah.

Keterangan:

\*) merupakan share pangsa pasar dimana data konsumsi nasional sebagai data acuan

\*\*\*) merupakan perkembangan konsumsi nasional yang menggunakan data P1 sebagai data acuan perbandingan

**B.7.2. Dampak Harga**

**a. Price Undercutting**

**Tabel 12. Harga Nylon Film (USD/MT)**

No.	Harga	(Indeks)			
		P1	P2	P2	PP
1.	IDN	100	100	100	100
2.	RRT	100	91	104	105
3.	Thailand	89	81	83	88
4.	Taiwan	99	86	102	97
5.	Total Negara Dumping	97	88	99	99
<b>Price Undercutting</b>					
6.	RRT	(0,4)	9	(4)	(5)
7.	Thailand	11	19	17	12
8.	Taiwan	1	14	(2)	3
9.	Total Negara Dumping	3	12	1	1

Sumber: BPS dan IDN, diolah.

\*) Harga impor + MFN + THC + Profit

44. Sesuai dengan *Article 3.3 ADA* dimana margin dumping tidak *de minimis* dan volume impor tidak *negligible* dan kondisi persaingan barang impor yang saling bersaing di pasar yang sama dan juga bersaing dengan barang produksi IDN

maka otoritas melakukan *assesment* secara kumulatif. Pada Tabel 12 menunjukkan bahwa sepanjang periode penyelidikan, harga produk impor dari negara dumping secara konsisten selalu lebih rendah daripada harga IDN.

**b. Price Depression dan Price Suppression**

**Tabel 13. Harga Jual Nylon Film IDN dan Harga Pokok Penjualan (HPP)**

							<i>(Indeks)</i>
No.	Indikator	Satuan	P1	P2	P3	PP	Tren (%)
1.	Harga Jual IDN	USD/MT	100	84	81	102	0,19
2.	HPP	USD/MT	101	84	77	105	0,57
<b>Selisih</b>		%	(1)	0	4	(3)	-

Sumber: IDN dan BPS, diolah.

45. Tabel di atas menunjukkan bahwa HPP mengalami peningkatan dengan tren sebesar 0,57% sementara harga jual IDN hanya mengalami peningkatan dengan tren sebesar 0,19%.

**B.8. FAKTOR LAIN**

**B.8.1. Impor Negara Lain**

**Tabel 14. Volume Impor Nylon Film**

Negara Asal	Satuan	P1	P2	P3	PP	Tren (%)
<b>Total Impor Dumping</b>	<b>MT</b>	<b>4.557,36</b>	<b>6.549,54</b>	<b>7.427,25</b>	<b>7.911,90</b>	19,49
RRT	MT	3.180,28	4.447,16	5.176,53	4.359,52	11,61
Thailand	MT	1.366,37	2.039,09	1.851,42	2.409,28	17,41
Taiwan	MT	10,72	63,29	399,31	1.143,11	387,98
<b>Negara Lainnya</b>	<b>MT</b>	<b>1.269,03</b>	<b>1.099,11</b>	<b>1.116,56</b>	<b>727,07</b>	(15,25)
<b>Total</b>	<b>MT</b>	<b>5.826,39</b>	<b>7.648,66</b>	<b>8.543,81</b>	<b>8.638,97</b>	13,80

Sumber: BPS, diolah.

46. Pada Tabel 14 di atas terlihat bahwa total impor Nylon Film mengalami peningkatan selama periode penyelidikan dengan tren sebesar 13,80%, disaat yang bersamaan impor Nylon Film yang berasal dari negara lainnya mengalami penurunan dengan tren sebesar 15,25%, sementara impor yang berasal dari negara dumping mengalami peningkatan dengan tren sebesar 19,49%.

## B.8.2. Perkembangan Ekspor Pemohon

**Tabel 15. Penjualan IDN**

(Indeks)

No	Penjualan	Satuan	P1	P2	P3	PP	Tren (%)
1.	Domestik	MT	34	36	33	41	0,85
2.	Ekspor	MT	66	64	67	59	(6,88)
3.	Total	MT	100	100	100	100	(4,01)

Sumber: IDN diolah.

47. Pada Tabel 15 di atas terlihat bahwa volume penjualan domestik mengalami peningkatan dengan tren sebesar 0,85% sementara penjualan ekspor mengalami penurunan dengan tren sebesar 6,88%.

## B.8.3. Konsumsi Nasional

**Tabel 16. Konsumsi Nasional Nylon Film**

Indikator	Pangsa (%)				Tren Pangsa (%)
	P1	P2	P3	P4	
<b>Negara Dumping</b>	<b>33,45</b>	<b>41,38</b>	<b>46,54</b>	<b>46,78</b>	<b>11,89</b>
RRT	23,34	28,10	32,43	25,77	4,51
Thailand	10,03	12,88	11,60	14,24	9,94
Taiwan	0,08	0,40	2,50	6,76	356,90
<b>Negara Lain</b>	<b>9,31</b>	<b>6,94</b>	<b>7,00</b>	<b>4,30</b>	<b>(20,65)</b>
<b>Total Impor</b>	<b>42,77</b>	<b>48,33</b>	<b>53,53</b>	<b>51,08</b>	<b>6,56</b>
Penjualan IDN	57,23	51,67	46,47	48,92	(5,61)
Penjualan idn Lainnya	-	-	-	-	-
<b>Konsumsi Nasional*</b>	<b>100,00</b>	<b>100,00</b>	<b>100,00</b>	<b>100,00</b>	<b>-</b>
<b>Konsumsi Nasional**</b>	<b>100,00</b>	<b>116,17</b>	<b>117,15</b>	<b>124,15</b>	<b>6,79</b>

Sumber: BPS dan IDN, diolah.

Keterangan:

\*) merupakan share pangsa pasar dimana data konsumsi nasional sebagai data acuan

\*\*) merupakan perkembangan konsumsi nasional yang menggunakan data P1 sebagai data acuan perbandingan

48. Tabel 16 di atas menunjukkan perkembangan konsumsi nasional Nylon Film di Indonesia yang diperoleh dari total impor dan volume penjualan Industri Dalam Negeri. Selama periode penyelidikan, konsumsi nasional Nylon Film mengalami peningkatan dengan tren sebesar 6,79%. Pada periode yang sama pangsa pasar IDN justru mengalami penurunan dengan tren sebesar 5,61%, namun impor Nylon Film dari negara yang dituduh dumping mengalami

kenaikan dengan tren sebesar 11,89%. Jika dilihat per masing-masing negara dumping, pangsa impor RRT, Thailand, dan Taiwan mengalami peningkatan dengan tren masing-masing sebesar 4,51%, 9,94%, dan 356,90%.

#### **B.8.4. Teknologi**

49. Teknologi yang digunakan oleh IDN dalam memproduksi Nylon Film sama dengan teknologi yang digunakan oleh produsen Nylon Film baik di RRT, Thailand, maupun di Taiwan pada umumnya.

Jakarta, Juli 2023

Komite Anti Dumping Indonesia

**MAIN DATA REPORT OF ANTIDUMPING INVESTIGATION  
THE PRODUCTS ARE FROM NYLON FILM  
PEOPLE'S REPUBLIC OF CHINA (PRC), THAILAND AND TAIWAN**

UNCONFIDENTIAL VERSION

TIDAK RAHASIA

**INDONESIAN ANTI DUMPING COMMITTEE  
MINISTRY OF TRADE OF THE Republic of Indonesia**

**2024**

**MAIN DATA REPORT ON ANTI-DUMPING INVESTIGATION ON NYLON FILM PRODUCTS  
WHICH COME FROM THE PEOPLE'S REPUBLIC OF CHINA (PRC), THAILAND AND TAIWAN**

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## A. INTRODUCTION

### A.1. BACKGROUND

1. The Indonesian Anti-Dumping Committee (KADI) initiated an anti-dumping investigation dumping on imports of Nylon Film originating from the People's Republic of China (PRC), Thailand, and Taiwan on March 28, 2023 based on application submitted by PT Emblem Asia and PT Kolon Ina which hereinafter referred to as the Applicant. The applicant is an internal industry Negeri (IDN) which produces Nylon Film which is based on the Tariff Book Indonesian Customs (BTKI) 2022 is included in tariff headings ex.3920.92.10 and ex.3920.92.99.
2. In accordance with the provisions of Government Regulation Number 34 of 2011 (PP 34/2011) concerning Antidumping Measures, Compensatory Measures and Measures Trade Security in Article 13 paragraph (2) letter b and *Article 6.9 Agreement on Implementation of Article VI of GATT 1994 (Anti Dumping Agreement/ADA)*, KADI publishes a Main Data Report (*Essential Facts*) The results of the investigation will be the basis for the final decision on the results of the investigation anti-dumping on imports of Nylon Film.

### A.2. PROCEDURE

3. In accordance with Article 7 PP 34/2011 and *Article 5.5 ADA*, on February 14 2023 KADI pre-notified representatives of the PRC, Thailand, and Taiwan in Indonesia regarding receipt of the investigation request antidumping on imports of Nylon Film originating from China, Thailand, and Taiwan.
4. After analyzing the initial evidence on the application, KADI determines that the application has fulfilled the requirements for submitting evidence preliminary regarding dumping, losses experienced by the Petitioner, and relationships causality between the two so that an investigation can be initiated.
5. On March 28, 2023 KADI announced the start of an investigation antidumping on Nylon Film products originating from China, Thailand, and Taiwan via Indonesian Business Daily. The announcement was made officially to all interested parties accompanied by



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sending questionnaires to domestic industry, exporters/exporters known producers and importers. KADI also provides 40 opportunities (forty) days to answer the questionnaire starting from the date delivery and provide an opportunity to provide feedback written and submit a hearing to the party concerned interested.

6. Interested parties identified in the application are:

a. PRC Exporter/Manufacturer Exporter

- 1) Kunshan Yuncheng Plastic Industry Co., Ltd.
- 2) Xiamen Changsu Industrial Co., Ltd
- 3) Cangzhou Donghong Packing Material Co., Ltd
- 4) Foshan Plastics Group Co., Ltd (FSPG)
- 5) Huan Yuang Plastic Film
- 6) Qingdao Kingchuan Yuanrong International Trading Co., Ltd.
- 7) Olunro Corporation
- 8) Anhui Eastern Communication Group
- 9) Xiamen Best Resource Foreign Trade Co., Ltd
- 10) Wenzhou Ruiyann Industry Co., Ltd
- 11) Shanghai Plastech International Trading Co., Ltd
- 12) Zhejiang Haibin Film Technology Co., Ltd
- 13) Hebei Nieshang Trade Co., Ltd.
- 14) Hyosung Chemical (Jiaxing) Co., Ltd.

b. Exporter/Producer Exporter Thailand

- 1) AJ Plast Public Company Limited
- 2) Thaipolyamide Co., Ltd.
- 3) Thailon Techno Fiber Limited
- 4) One Stop Pack Company Limited
- 5) Thai Toray Synthetics Company Limited
- 6) Thai Polymer Supply Co., Ltd.
- 7) Asia Fiber Public Company Limited (AFC)

c. Taiwan Manufacturer Exporter/Exporter

- 1) Torai International Taipei Inc.

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- 2) Li Ling Film Co., Ltd.
- 3) Pai Huey Plastic Industry
- 4) Zig Sheng Industrial Co., Ltd
- 5) Chia Chyi Matrix Tech Inc.
- 6) Nan Ya Plastics Corporation

d. Importer

- 1) PT Surya Sukses Mandiri
- 2) PT Karunia Indah Perdana
- 3) PT Panverta Cakrakencana
- 4) CV. Indopack Sejahtera
- 5) PT International Packaging Manufacturing
- 6) PT Aneka Jasuma Sejahtera
- 7) PT Plastindo Lestari
- 8) PT Cipta Rama Kamasindo
- 9) PT Supernova Flexible Packaging
- 10) PT Lumina Packaging
- 11) PT Toray International Indonesia
- 12) PT Surabaya Perdana Rotopack
- 13) PT Buana Chandra Mandiri
- 14) PT Utomo Print Success
- 15) PT Megasetia Agung Kimia
- 16) PT Colorpack Flexible Indonesia
- 17) PT International Packaging Manufacturing
- 18) PT Bonavista Polypack
- 19) PT Suryakemasindo Sejati
- 20) PT Surya Sukses Mandiri
- 21) PT Nagamas Packaging
- 22) PT Interflex Sejahtera Perdana
- 23) Fa. Indomas

7. The investigation period in this investigation is for losses covering 1  
July 2018 to 30 June 2019 (P1), 1 July 2019 to 30 June 2020 (P2), 1 July 2020

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until 30 June 2021 (P3), 1 July 2021 until 30 June 2022 (PP), while for the dumping investigation period (PP) is 1 July 2021 to 30 June 2022 (PP).

8. In accordance with recital 5, KADI provides a time limit for submitting answers questionnaire to each interested party. Up to you the specified time limit, the parties submit their answers questionnaires are:

a. Domestic Industry:

- 1) PT Emblem Asia
- 2) PT Kolon Ina

b. PRC Manufacturer Exporter:

- 1) Kunshan Yuncheng Plastic Industry Co. Ltd
- 2) Yuncheng Qilong New-Material Co. Ltd
- 3) Yuncheng Heshan New Material Co. Ltd
- 4) Hyosung Chemical Fiber (Jiaxing) Co. Ltd.
- 5) Hyosung Chemical Corp.
- 6) Xiamen Changsu Industrial Co., Ltd

c. Thailand Producer Exporter:

- 1) AJ Plast Public Company Limited

d. Importer:

- 1) PT Plasindo Lestari
- 2) PT Aneka Jasuma Sejahtera
- 3) PT Surya Sukses Mandiri
- 4) PT Supernova Flexible Packing
- 5) PT Surabaya Perdana Rotopack
- 6) PT Panverta Cakrakencana

9. KADI has carried out field verification at the location:

a. Domestic Industry:

- 1) PT Emblem Asia, from 13 to 15 November 2023
- 2) PT Kolon Ina, from 8 to 10 November 2023

b. PRC Manufacturer Exporter:

- 1) Kunshan Yuncheng Plastic Industry Co. Ltd.: 2 to 4 December 2023
- 2) Yuncheng Qilong New-Material Co. Ltd.: 27 to 28 November 2023

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- 3) Yuncheng Heshan New Material Co. Ltd.: November 29 to 1 December 2023
- 4) Hyosung Chemical Fiber (Jiaxing) Co. Ltd.: November 30 to 3 December 2023
- 5) Hyosung Chemical Corp: November 30 to December 3 2023
- 6) Xiamen Changsu Industrial Co., Ltd.: 27 to 29 November 2023
- c. Thai Manufacturer Exporter namely AJ Plast Public Company Limited, on 12 to 14 December 2023

10. Based on Article 9 paragraph (2) PP 34/2011 and *Article 5.10 ADA*, on the date March 27 2024 KADI extends the investigation period.

## **B. INVESTIGATION**

### **B.1. ITEMS UNDER INVESTIGATION AND SIMILAR ITEMS**

11. The goods investigated are Nylon Film (excluding plates and sheets) originating from China, Thailand and Taiwan which are included in the tariff post ex.3920.92.10 and ex.3920.92.99 based on PMK No 26/PMK.010/2022 concerning Determination of the Goods Classification System and Imposition of Customs Tariffs Entry on Imported Goods. Description of goods from the 2 (two) tariff posts above are:

**Table 1. Description of Nylon Film Products**

<b>HS Number</b>	<b>Description of goods</b>
3920	Plates, sheets, films, foils and other strips, of plastic, non-cellular and not reinforced, not laminated, not supported or otherwise combined in any such way it's with other ingredients.
3920.92	- From other plastics:
3920.92	-- From polyamide:
ex.3920.92.10 ---	From polyamide-6
	--- Etc:
ex.3920.92.99 ----	Others

Source: BTKI 2022

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**Production process**

12. The following is the Nylon Film production process:

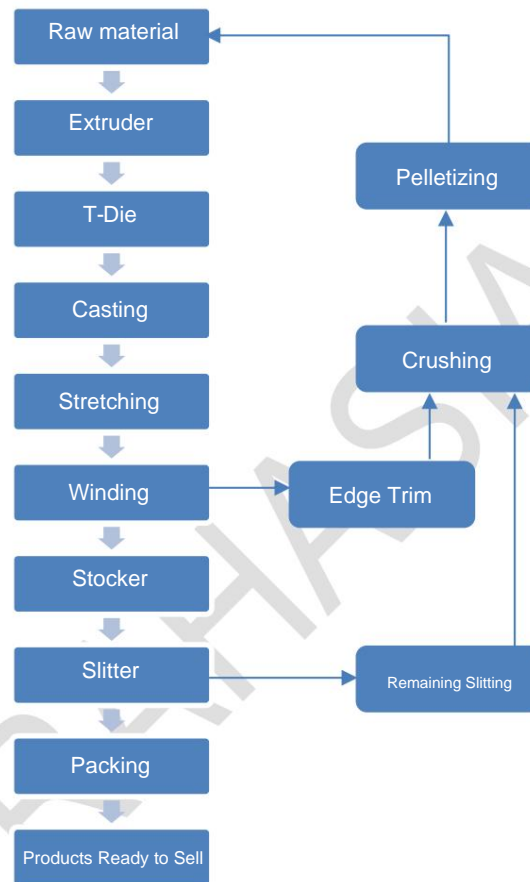


Figure 1. Nylon Film Production Process

- a. **Extruder (Melt):** raw materials in the form of chips are mixed and melted into polymer.
- b. **T-Die (Polymer Spread):** the polymer melt is spread into plastic sheet form.
- c. **Casting Process :** Melted polymer that is already in plastic form Cool suddenly to make it stiff.
- d. **Stretching Process :** The stiffened plastic sheet is pulled secondly direction until the plastic becomes thinner and becomes more stable and in film form.
- e. **Winding and Edge Trim:** the film that has been formed is then trimmed trim the edges and roll on a large roll. The remaining pieces will be processed to be used as *recyclable material*.

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- f. Stocking **Process** : Large rolls of film are stored in *stockers* before *slitting processing*.
- g. Slitting **Process** : Large rolls of film are then cut (*slit*) to into smaller roll sizes according to customer orders, while the remaining unused pieces are processed for materials *recycle*.
- h. Packaging **Process** : roll the size according to the order then packaged and the product is ready to be sold and sent to customers.
- i. **Crushing**: *recycled* material from *the edge trim* and *slitting* process is crushed (chopped) and made into pellets to form chips and returned as recycled raw materials .

13. Technology used by domestic industry to produce Nylon Film is no different from the technology used by exporters producers from the country accused of producing Nylon Film.

## B.2. DOMESTIC INDUSTRY AND STANDING PETITIONERS

Table 2. Nylon Film Production

No.	Indicator	%
1. PT	Emblem Asia	58
2. PT	Kolon Ina	42
<b>3.</b>	<b>Total IDN Production</b>	<b>100</b>
4.	Total industrial production in other areas	0
<b>5.</b>	<b>Total National Production</b>	<b>100</b>

Source: IDN, processed

14. Based on Table 2 above, the Applicant's total production is 100% of the total national production, thus the Applicant has fulfilled the requirements representing IDN as stated in Article 4 paragraph (3) and Article 6 paragraph (1) (a) PP 34/2011 and *Article 5.4 ADA*.

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### **B.3. DOMESTIC MARKET OF GOODS INVESTIGATED**

15. In accordance with PMK No.43/PMK.010/2022 concerning Determination of Customs Tariffs Entering into the framework of the Agreement on Trade in Goods Between Countries Member of the Association of Southeast Asian Nations (*ASEAN Trade in Goods Agreement*) and PMK No. 46/PMK.10/2022 concerning Tariff Determination Import Duties in the Context of Internal Goods Trade Agreement Framework Agreement Concerning Comprehensive Economic Cooperation Between Association of Southeast Asian Nations and People's Republic of China (*ASEAN-China Free Trade Area*) the amount of import duties for Nylon Movies are as follows:

**Table 3. Description of goods and import duty rates**

<b>HS Number</b>	<b>Description of</b>	<b>ACFTA</b>	<b>ATIGA</b>	<b>MFN</b>
3920	<b>Goods</b> Plates, sheets, films, foils and other strips, of plastic, non-cellular and not reinforced, not laminated, not supported or combined in such a way with other materials.			
3920.92	- From other plastics:			
3920.92	-- From polyamide:			
3920.92.10 --- Of polyamide-6 --- Others:		25%	0%	10%
3920.92.99 ---- Others		30%	0%	25%

16. Table 4 below shows the development of national Nylon consumption Films in Indonesia are obtained from the total import and sales volume of the industry Domestic. During the period of investigation, national consumption of Nylon Film experienced an increase with a trend of 6.79%. In the same period IDN's market share actually decreased with a trend of 5.61%, However, imports of Nylon Film from countries accused of dumping are experiencing problems an increase with a trend of 11.89%. If you look at each country dumping, the share of imports from China, Thailand and Taiwan has increased with trends of 4.51%, 9.94% and 356.90% respectively.

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**Table 4. Development of National Nylon Film Consumption**

Indicator	Share (%)				
	P1	P2	P3	PP	Trends
<b>Dumping Country</b>	<b>33.45</b>	<b>41.38</b>	<b>46.54</b>	<b>46.78</b>	<b>11.89</b>
PRC	23.34	28.10	32.43	25.77	4.51
Thailand	10.03	12.88	11.60	14.24	9.94
Taiwan	0.08	0.40	2.50	6.76	356.90
<b>Other countries</b>	<b>9.31</b>	<b>6.94</b>	<b>7.00</b>	<b>4.30</b>	<b>(20.65)</b>
<b>Total Imports</b>	<b>42.77</b>	<b>48.33</b>	<b>53.53</b>	<b>51.08</b>	<b>6.56</b>
IDN Sales	57.23	51.67	46.47	48.92	(5.61)
IDN Sales Others	-	-	-	-	-
<b>National Consumption*</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	-
<b>National Consumption**</b>	<b>100.00</b>	<b>116.17</b>	<b>117.15</b>	<b>124.15</b>	<b>6.79</b>

Central Statistics Agency; IDN Questionnaire Answers. Processed.

Information:

\*) is market share with national consumption data as reference data

\*\*) is the development of national consumption using P1 data as a reference for comparison data

#### **B.4. LEVEL OF COOPERATION**

17. Based on the questionnaire answers received by KADI, it was found that level of cooperation from the originating Nylon Film exporter and/or producer of the RRT who answered the questionnaire was 90.82% when compared with the volume of Nylon Film imports originating from China entering Indonesia. Thus, for other companies that are not cooperative or that unknown in the investigation (*residual duty*), subject to margin highest dumping from cooperative companies.
18. Based on the questionnaire answers received by KADI, it was found that level of cooperation from the originating Nylon Film exporter and/or producer from Thailand who answered the questionnaire was 66.77% when compared with the volume of Nylon Film imports originating from Thailand entering Indonesia. Thus, for other companies that are not cooperative or which is not known during the investigation (*residual duty*), is imposed dumping margin based on the highest normal value and the lowest export price from a cooperative company in Thailand.



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19. Based on the questionnaire answers received by KADI, it was found that there is not a single exporter and/or manufacturer of Nylon Film originating from Taiwan who answered the questionnaire. Thus, the amount of margin dumping for Taiwan is based on the highest normal value and export price lowest from the data held by KADI.

**B.5. DETERMINATION OF THE DUMPING MARGIN**

20. In calculating dumping margin, KADI uses data obtained from the answers of the producers or exporters of the producers who are charged BMAD as stated in the questionnaire. Margin dumping generally determined based on the difference between the normal price (sales price at domestic) at the export price at the time of delivery and level the same trade (ex factory price).

21. Test Profitability and Cost of Goods Sold (COGS)

In general, KADI accepts the allocation of costs made by producers or exporters of producers who are subject to BMAD in order assignment of costs in the product under investigation, throughout the allocation It reflects production costs, sales and administration costs general information supported by data in financial reports. However, if the allocation of these costs is considered not to reflect the costs In fact, adjustments are made that are deemed reasonable. Adjustment This will be conveyed to the producer or exporter concerned.

22. Calculation of dumping margins carried out by KADI for producers or producer exporter is submitted separately to each producer or producer exporter as an attachment to the main data report

This.

**B.5.1. Normal Value**

23. Normal value of each producer or producer exporter, in general determined based on the weighted average of domestic sales transactions during the investigation period.

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24. Normal values are calculated based on data submitted by the company that is investigated, namely sales data and proposed *allowances* data as stated in the questionnaire answers. Domestic sales producers or exporters can be used in calculating the value normal if it meets normal trading *requirements* (*course of trade*). The normal value is determined at the time of delivery of the goods at factory (*ex-factory*).
25. *Allowances* submitted by producers or exporters received are those related to direct selling costs (*expense*), and can be traced in company data related to sale of the goods under investigation. In general, *allowances* can be accepted if is part of the cost of sales of the goods under investigation, which generally classified into selling, general and administrative expenses (*selling, general and administrative expenses*).
26. In calculating normal values, sales data of producers or exporters producers can be used if the total domestic sales volume is more than 5% of the total export sales volume to Indonesia, and if the volume profitable sales are less than 20% then the transaction ignored and used construction methods. If the sales volume is profitable more than 20% up to 80%, then only transactions profitable ones used in normal value calculations, and if more than 80%, all sales transactions are used in calculation of normal values.
27. If there are export sales for certain goods control codes (KKB), however not sold domestically, then the normal value is constructed (*constructed normal value*) based on production costs for certain KKB, sales costs, costs general and domestic administration costs, as well as reasonable profits.

### **B.5.2. Export Price**

28. Export prices for producers or producer exporters are determined based on weighted average of all export sales transactions to Indonesia during the Investigation Period which has been reduced by the *allowances*

acceptable and costs associated with direct sales are put forward and believed to be true. Export prices are carried out at ex-factory.

### **B.5.3. Dumping Margins**

Analysis of dumping margin calculations for each company in that country accused is temporary and only based on questionnaire answers, *deficiency letter* answers, verification results and data held by KADI.

#### **People's Republic of China (PRC)**

#### **29. Kunshan Yuncheng Plastic Industry Co., Ltd (Kunshan), Yuncheng Heshan New Material Co. Ltd (Heshan), Yuncheng Qilong New-Material Co. Ltd (Qilong)**

Kushan and Heshan are affiliated producers of Nylon Film in the PRC sells its products in the domestic and export markets, while Qilong is an affiliate company of Kushan and Heshan but only selling its products in the domestic market.

##### **1) Normal Value**

In calculating normal values, KADI considers adequacy domestic sales volume and profitable sales volume.

In terms of calculating the adequacy of domestic sales volume, KADI using domestic sales data of Kushan and Heshan.

Heshan sells 21 KKB products and Kushan sells 68 KKB Nylon products. Identical films are sold in domestic and export markets, based on

The profitability test calculation for each company is calculated based on a weighted average.

Because the delivery terms (*terms of delivery*) conveyed are delivered, so that the Company claims shipping costs as an allowance and is acceptable.

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2) Export Prices

Export prices use Kushan and Heshan export sales data to Indonesia and has been reduced by *the allowance* (adjustment) claimed acceptable company. After subtracting the price For all sales transactions with an allowance, the export price is obtained ex-factory.

3) Dumping Margin

By subtracting the normal value and export price from the ex level factory and compared with the CIF price of dumping margin for Kushan, Heshan, and Qilong it is 8.58%.

30. **Hyosung Chemical Fiber (HCF) Co. Ltd. and Hyosung Chemical Corp (HCC)**

HCF (RRT) is a Nylon Film producer affiliated with HCC (Korea) who is a trader in this investigation. HCF does domestic sales and HCC sells HCF products in export markets incl export to Indonesia.

1) Normal Value

In calculating normal values, KADI considers adequacy domestic sales volume and profitable sales volume.

In terms of calculating the adequacy of KADI's domestic sales volume using HCF domestic sales data.

HCC sells 61 types of Nylon Film (KKB) products to the Indonesian market, will but only 14 KKBs were identical to those sold by HCF on the market domestic. KADI carried out *profitability test* calculations for 14 KKB identical and obtained profitability of 87% to 100%. Upper 47

For KKB that is not sold in the domestic market, the normal value is calculated with construction methods.

The normal value of 14 identical KKB is obtained by subtracting *allowance* submitted by HCF that can only be accepted.

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2) Export Prices

Export prices use HCC export sales data to Indonesia and has been reduced by *the allowance* (adjustment) claimed by the company which is acceptable. After subtracting the price of all transactions Sales with allowances include producer profits to traders.

3) Dumping Margin

Dumping margin calculation by subtracting the normal value and Export prices are at ex-factory level and compared with CIF prices acquisition for HCF and HCC, obtained a dumping margin of 21.93%

31. Xiamen Changsu Industrial Co., Ltd (Xiamen)

Xiamen is an exporter that sells Nylon Film producers in China products in the domestic market and export sales to Indonesia

1) Normal Value

In calculating normal values, KADI considers adequacy domestic sales volume and profitable sales volume.

Xiamen sells 101 types of identical Nylon Film products sold in domestic and export markets, and based on *profitability test* calculations The 101 product types are calculated based on the average weighted.

The normal value of 101 identical KKB is obtained by subtracting *allowance* submitted by Xiamen which can only be accepted.

2) Export Prices

Export prices use export sales data to Indonesia and have been minus *the allowance* (adjustment) claimed by the company acceptable. After subtracting the price of all transactions sales with *an allowance* are obtained at the ex-factory export price.

### 3) Dumping Margin

By subtracting the normal value and export price at the ex-factory and compared with the CIF price obtain the dumping margin for Xiamen at 40.87%.

## 32. Exporters and/or Other Producer Exporters

For all other companies apart from companies that have mentioned above will be subject to the highest amount of dumping margin  
The cooperative companies above are 40.87%.

## Thailand

### 33. AJ Plast Public Company Limited (AJ Plast)

#### 1) Normal Value

Calculation of normal values is carried out using data obtained from questionnaire answers. When conducting domestic sales, carried out directly to customers without going through the company affiliated. The data used is AJ Plast domestic sales data minus *the allowances* applied for and accepted so that Ex-factory domestic prices are obtained. There are 83 KKBs for sale in the domestic market is identical to the export market to Indonesia.

The normal value of 83 identical KKB is obtained by subtracting *The allowance* submitted by AJ Plast is only acceptable.

#### 2) Export Prices

In carrying out export sales to Indonesia, it is carried out by: directly to customers without going through affiliated companies or *traders*, so that export price calculations are carried out using using AJ Plast export sales data to Indonesia. Export price ex-factory is obtained from the CIF price minus the proposed *allowances* and acceptable.

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### 3) Dumping Margin

Based on the calculation results and by comparing the averages normal value weighted by export prices at the trade level the same (ex-factory), a dumping margin of 12.23% was found

### 34. Exporters and/or Other Producer Exporters

For all other companies apart from companies that have mentioned above will be subject to a dumping margin amount based on value the highest normal and lowest export prices from cooperative companies in Thailand is 37.34%.

### Taiwan

35. No company was cooperative in the investigation, so all Taiwanese companies will be subject to dumping margin amounts based on the highest normal value and lowest export price data owned by KADI, namely 77.63%.

### B.6. DOMESTIC INDUSTRY PERFORMANCE

36. In Table 5 below are indicators of IDN's economic performance KADI uses it as a basis for analyzing future losses delivered at recitals 38-41.

37. Considering that IDN loss data and the figures below are sensitive commercially, it is presented in index form in the Data Report Main version is not secret.

**Table 5. IDN Performance Indicators**

							(Index)
No.	Indicator	Units	P1	P2	P3	PP	Trend (%)
1	Domestic Sales	MT	100	103	94	106	0.84
		USD	100	87	79	108	1.36
2	Profit (loss)	USD	100	295	497	28	(28.37)
3	Domestic Prices	USD/MT	100	84	84	102	0.51
4	Cost of goods sold (HPP)	USD/MT	100	84	77	105	0.57
5	Market Shares	%	100	89	80	85	(5.57)

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							(Index)
No.	Indicator	Units	P1	P2	P3	PP	Trend (%)
6	Installed Capacity	MT	100	100	100	100	-
7	Capacity Utilization	%	100	97	95	91	(2.80)
8	Production	MT	100	97	95	91	(2.80)
9	Supplies	MT	100	57	63	82	(4.75)
10	Workers	Org	100	95	97	121	5.95
11	Wages	USD	100	106	112	114	4.65
12	Productivity	MT/Org	100	102	98	76	(8.26)
13	Operating Cash Flow	USD	100	96	993	186	52.29
14	Return on Investment	%	100	308	261	123	4.63
15	Profit Growth	%	(100)	223	78	(108)	-
16	Ability to raise capital (Debt Equity Ratio)	%	100	119	98	93	(4.09)

Source: IDN, processed.

**Table 6. Domestic Sales, Domestic Profit, Domestic Prices and Cost of Goods Sold (COGS)**

							(Index)
No.	Indicator	Units	P1	P2	P3	PP	Trend (%)
1	Domestic Sales	MT	100	103	94	106	0.84
		USD	100	87	79	108	1.36
2	Profit (loss)	USD	100	295	497		28 (28.37)
3	Domestic Prices	USD/MT	100	84	84	102	0.51
4	HPP	USD/MT	100	84	77	105	0.57

Source: IDN, processed.

38. In Table 6 it can be seen that during the period under investigation, sales in The country both in volume and value has increased with the trend of 0.84% and 1.36%. Domestic prices and COGS also experienced increasing with a trend of 0.51% and 0.54%, but at the same time At the same time, profit (loss) decreased with a trend of 28.37%.



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**Table 7. Market Share, Installed Capacity, Capacity Utilization, Production and Inventory**

No.	Indicator	Units	(Index)				PP Trend (%)
			P1	P2	P3	PP	
1	Market Share	%	100	89	80	85	(5.57)
2	Installed Capacity	MT	100	100	100	100	-
3	Capacity Utilization	%	100	97	95	91	(2.80)
4	Production	MT	100	97	95	91	(2.80)
5	Supplies	MT	100	57	63	82	(4.75)

Source: IDN, processed.

39. In Table 7 above it can be seen that during the investigation period, capacity IDN is still installed, but capacity utilization, production, inventory as well market share decreased with a trend of 2.80%, 2.80%, 4.75% and 5.57%.

**Table 8. Production, Supplies, Labor, Wages, and Productivity**

No.	Indicator	Units	(Index)				PP Trend (%)
			P1	P2	P3	PP	
1	Production	MT	100	97	95	91	(2.80)
2	Labor	Org	100	95	97	121	5.95
3	Wages	USD	100	106	112	114	4.65
4	Productivity	MT/Org	100	102	98	76	(8.26)

Source: IDN, processed.

40. In Table 8 above it can be seen that during the period under investigation, the workforce and wages have increased with a trend of 5.95% and 4.65%, but on the contrary, production and productivity have decreased with trend of 2.80% and 8.26%.

**Table 9. Operating Cash Flow, Return on Investment, Profit Growth, and Ability to Increase Capital**

No.	Indicator	Unit	(Index)				Trend (%)
			P1	P2	P3	PP	
1	Operating Cash Flow	USD	100	96	93	186	52.29
2	Return on Investment	%	100	308	261	123	4.63
3	Profit Growth	%	(100)	223	78	(108)	-
4	Ability to raise capital (Debt Equity Ratio)	%	100	119	98	93	(4.09)

Source: IDN, processed.

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41. In Table 9 above, IDN's overall performance can be seen an increase shown by increasing operating cash flow and ROI which increased with a trend of 52.29% and 4.63% and *Debt Equity Ratio* decreased with a trend of 4.09%.

## B.7. CAUSALITY

### B.7.1. Volume Impact

#### a. Absolute Volume Impact

**Table 10. Development of Nylon Film Import Volume**

Country of origin	Unit	P1	P2	P3	PP	Trend (%)
<b>Total Dumping Imports</b>	<b>MT 4,557.36</b>	MT 3,180.28	<b>6,549.54</b>	<b>7,427.25</b>	<b>7,911.90</b>	19.49
PRC	MT 1,366.37	10.72	4,447.16	5,176.53	4,359.52	11.61
Thailand	<b>MT 1,269.03</b>	<b>MT</b>	2,039.09	1,851.42	2,409.28	17.41
Taiwan	MT		63.29	399.31	1,143.11	387.98
<b>Other Countries</b>	<b>5,826.39</b>	Source:	<b>1,099.11</b>	<b>116.56</b>	<b>727.07</b>	(15.25)
<b>Total</b>	Central Statistics		<b>7,648.66</b>	<b>8,543.81</b>	<b>8,638.97</b>	13.80

Agency, processed.

42. Based on Table 10 above, it can be seen that total imports experienced an increase with a trend of 13.8%. Imports from dumping countries experienced an increase with a trend of 19.49%. Meanwhile imports from other countries experienced a decline with a trend of 15.25%.
43. Table 11 shows the development of national consumption of Nylon Film in Indonesia obtained from total imports and sales volume of domestic industry Country. During the period of investigation, national consumption of Nylon Film experienced an increase with a trend of 6.79%. In the same period IDN's market share actually decreased with a trend of 5.61%, However, imports of Nylon Film from countries accused of dumping are experiencing problems an increase with a trend of 11.89%. If you look at each country dumping, the share of imports from China, Thailand and Taiwan has increased with trends of 4.51%, 9.94% and 356.90% respectively.

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**b. Relative Volume Impact on National Consumption**

**Table 11. Market Share Development**

Indicator	Share (%)				
	P1	P2	P3	PP	Trends
<b>Dumping Country</b>	<b>33.45</b>	<b>41.38</b>	<b>46.54</b>	<b>46.78</b>	<b>11.89</b>
PRC	23.34	28.10	32.43	25.77	4.51
Thailand	10.03	12.88	11.60	14.24	9.94
Taiwan	0.08	0.40	2.50	6.76	356.90
<b>Other countries</b>	<b>9.31</b>	<b>6.94</b>	<b>7.00</b>	<b>4.30</b>	<b>(20.65)</b>
<b>Total Imports</b>	<b>42.77</b>	<b>48.33</b>	<b>53.53</b>	<b>51.08</b>	<b>6.56</b>
IDN Sales	57.23	51.67	46.47	48.92	(5.61)
IDN Sales Others	-	-	-	-	-
<b>National Consumption*</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	-
<b>National Consumption**</b>	<b>100.00</b>	<b>116.17</b>	<b>117.15</b>	<b>124.15</b>	<b>6.79</b>

Source: BPS and IDN, processed.

Note: \*) is

market share where national consumption data is the reference data

\*\*) is the development of national consumption using P1 data as comparative reference data

**B.7.2. Price Impact**

**a. Price Undercutting**

**Table 12. Price of Nylon Film (USD/MT)**

No.	Price	(Index)			
		P1	P2	P2	PP
1.	IDN	100	100	100	100
2.	PRC	100	91	104	105
3.	Thailand	89	81	83	88
4.	Taiwan	99	86	102	97
5.	Total Country Dumping	97	88	99	99
<b>Price Undercutting</b>					
6.	PRC	(0.4)	9	(4)	(5)
7.	Thailand	11	19	17	12
8.	Taiwan	1	14	(2)	3
9.	Total Dumping Countries	3	12	1	1

Source: BPS and IDN, processed.

\*) Import price + MFN + THC + Profit

44. In accordance with *Article 3.3 of the ADA* where the dumping margin is not *de minimis* and the volume of imports is not *negligible* and conditions of mutual competition for imported goods compete in the same market and also compete with goods produced by IDN

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then the authority carries out a cumulative *assessment*. In Table 12

shows that throughout the period under investigation, the price of imported products from dumping countries are consistently lower than IDN prices.

**b. Price Depression and Price Suppression**

**Table 13. Selling Price of IDN Nylon Film and Cost of Goods Sold (HPP)**

No.	Indicator	Unit	P1	P2	P3	PP	(Index)
							Trend (%)
1.	IDN Selling Price	USD/MT	100	84	81	102	0.19
2.	HPP	USD/MT	101	84	77	105	0.57
	<b>Difference</b>	%	(1)	0	4	(3)	-

Source: IDN and BPS, processed.

45. The table above shows that COGS has increased with the trend amounted to 0.57% while IDN selling prices only increased with a trend of 0.19%.

**B.8. OTHER FACTORS**

**B.8.1. Import from Other Countries**

**Table 14. Nylon Film Import Volume**

Country of origin	Unit	P1	P2	P3	PP	Trend (%)
<b>Total Dumping Imports</b>	<b>MT 4,557.36</b>	<b>6,549.54</b>	<b>7,427.25</b>	<b>7,911.90</b>	<b>MT 3,180.28</b>	19.49
PRC	4,447.16	5,176.53	4,359.52			11.61
Thailand	MT 1,366.37	2,039.09	1,851.42	2,409.28		17.41
Taiwan	MT	10.72	63.29	399.31	1,143.11	387.98
<b>Other Countries</b>	<b>MT 1,269.03</b>	<b>1,099.11</b>	<b>1,116.56</b>	<b>727.07</b>	<b>(15.25)</b>	
<b>Total</b>	<b>MT 5,826.39</b>	<b>7,648.66</b>	<b>8,543.81</b>	<b>8,638.97</b>	<b>13.80</b>	

Source: BPS, processed.

46. In Table 14 above, it can be seen that total Nylon Film imports experienced increased during the investigation period with a trend of 13.80%, when At the same time, imports of Nylon Film originating from other countries were experienced decreased with a trend of 15.25%, while imports came from dumping countries experienced an increase with a trend of 19.49%.

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### B.8.2. Applicant's Export Development

**Table 15. IDN Sales**

*(Index)*

No	Sale	Unit P1		P2	P3	PP	Trend (%)
1.	Domestic	MT	34	36	33	41	0.85
2.	Export	MT	66	64	67	59	(6.88)
3.	Total	MT	100	100	100	100	(4.01)

Source: IDN processed.

47. In Table 15 above, it can be seen that domestic sales volume experienced increasing with a trend of 0.85% while export sales decreased with a trend of 6.88%.

### B.8.3. National Consumption

**Table 16. National Nylon Film Consumption**

Indicator	Share (%)				Trends Share (%)
	P1	P2	P3	P4	
<b>Dumping Country</b>	<b>33.45</b>	<b>41.38</b>	<b>46.54</b>	<b>46.78</b>	<b>11.89</b>
PRC	23.34	28.10	32.43	25.77	4.51
Thailand	10.03	12.88	11.60	14.24	9.94
Taiwan	0.08	0.40	2.50	6.76	356.90
<b>Other countries</b>	<b>9.31</b>	<b>6.94</b>	<b>7.00</b>	<b>4.30</b>	<b>(20.65)</b>
<b>Total Imports</b>	<b>42.77</b>	<b>48.33</b>	<b>53.53</b>	<b>51.08</b>	<b>6.56</b>
IDN Sales	57.23	51.67	46.47	48.92	(5.61)
IDN Sales Others	-	-	-	-	-
<b>National Consumption*</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>100.00</b>	<b>-</b>
<b>National Consumption**</b>	<b>100.00</b>	<b>116.17</b>	<b>117.15</b>	<b>124.15</b>	<b>6.79</b>

Source: BPS and IDN, processed.

Note: \*) is

*market share where national consumption data is the reference data*

*\*\* is the development of national consumption using P1 data as comparative reference data*

48. Table 16 above shows the development of national consumption of Nylon Film in Indonesia obtained from total imports and sales volume of domestic industry Country. During the period of investigation, national consumption of Nylon Film experienced an increase with a trend of 6.79%. In the same period IDN's market share actually decreased with a trend of 5.61%,  
However, imports of Nylon Film from countries accused of dumping are experiencing problems

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an increase with a trend of 11.89%. If you look at each country dumping, the share of imports from China, Thailand and Taiwan has increased with trends of 4.51%, 9.94% and 356.90% respectively.

**B.8.4. Technology**

49. The technology used by IDN in producing Nylon Film is the same with the technology used by Nylon Film manufacturers both in China, Thailand, as well as in Taiwan in general.

Jakarta, July 2023

Indonesian Anti-Dumping Committee