

**F. No. 6/55/2025 -DGTR
Government of India
Department of Commerce
Ministry of Commerce & Industry
(Directorate General of Trade Remedies)
4th Floor, Jeevan Tara Building 5,
Parliament Street, New Delhi – 110001**

INITIATION NOTIFICATION

Case No. AD (OI)-48/2025

Dated: 30th September, 2025

Subject: Anti-dumping investigation concerning imports of Polyethylene Terephthalate Film (PET Films) originating in or exported from Bangladesh, China PR, Thailand and United States of America.

F. No. 6/55/2025-DGTR. Chiripal Poly Films Limited, Ester Industries Limited and Vacmet India Limited (hereinafter referred to as 'applicants') have filed an application before the Designated Authority (hereinafter referred to as the 'Authority'), in accordance with the Customs Tariff Act, 1975 as amended from time to time (hereinafter referred as the 'Act') and the Customs Tariff (Identification, Assessment, and Collection of Anti-Dumping Duty on Dumped Articles and for Determination of Injury) Rules, 1995, as amended from time to time (hereinafter referred to as the 'Rules'), for initiation of an anti-dumping investigation concerning imports of Polyethylene Terephthalate Film (hereinafter referred to as 'PET Film' or 'product under consideration' or 'subject goods'), originating in or exported from Bangladesh, China PR, Taiwan, Thailand and United States of America.

The applicants have alleged that material injury is being caused to the domestic industry due to the dumped imports, originating or exported from Bangladesh, China PR, Taiwan, Thailand and United States of America and have requested for the imposition of anti-dumping duties on the imports of the subject goods from Bangladesh, China PR, Taiwan, Thailand and United States of America. However, as per the prima facie examination, the Authority finds that the volume of injurious imports from Taiwan is negligible and does not justify initiation of investigation against Taiwan. Accordingly, the present investigation has been initiated concerning imports of subject goods originating in or exported from Bangladesh, China PR, Thailand and United States of America (hereinafter also referred to as "subject countries").

A. PRODUCT UNDER CONSIDERATION

1. The product under consideration is "Polyethylene Terephthalate Film" or Biaxially Oriented Polyethylene Terephthalate Film of 8-100 microns. It is commonly known as PET Film or Polyester Film. It is a clear, flexible, transparent or translucent film and is available in a wide range of variants depending on its use. PET Film may be plain, chemical coated, acrylic coated, metalized films on one side or both sides. All such PET Films are biaxially oriented and are produced from the same raw material and using the same technology and therefore, such variants have similar physical and technical characteristics.
2. PET Film for use in solar panels is excluded from the scope of the product under consideration.
3. The product under consideration is widely used as a packaging material in fast moving consumer goods as food packaging, cosmetic packaging and other flexible packaging. It is also used for industrial application as electrical insulation, electrical material packaging and magnetic tapes and other applications where durability is required. It can be used for printing and is used in labels, posters, other printed materials and as adhesive tapes and silicon films. It is also used to provide a base and shine for manufacturing gold and silver yarns.
4. The subject goods are classified under Chapter 39 of the Customs Tariff Act, 1975 under headings 3920 and 3921. The subject goods are imported under tariff codes 3920 6210, 3920 6220, 39206290, 3920 6919 and 3921 9094. The customs classification is only indicative and is not binding on the scope of the product under consideration.
5. The applicants have not proposed the adoption of any PCN methodology at the present stage. The parties to the present investigation may provide their comments on the scope of the product under consideration and propose PCNs (with justification), if any, within fifteen (15) days from the date of initiation of this investigation.

B. LIKE ARTICLE

6. The applicants have claimed that the subject goods exported from the subject countries are identical to the goods produced by the domestic industry. The subject goods produced by the domestic industry have comparable characteristics to the subject goods imported from the subject countries in terms of technical specifications, physical and chemical characteristics, manufacturing process and technology, functions and uses, pricing, distribution & marketing and tariff classification. The two are technically and commercially substitutable. Therefore, for the purpose of initiation of the present investigation, the subject goods produced by the applicants are being treated as 'like article' to the subject goods originating in or exported from the subject countries.

C. DOMESTIC INDUSTRY AND STANDING

7. The application has been filed by Chiripal Poly Films Limited, Ester Industries Limited and Vacmet India Limited. Apart from the applicants there are other domestic producers engaged in the production of like article. Twelve (12) domestic producers, namely, Aakash Polyfilms Limited, Aegios Polyfilms Private Limited, Cosmo First Limited, Dhunseri Poly Films Private Limited, General Polyfilms Private Limited, GLS Polyfilms Private Limited, Jindal Poly Films Limited, Saj Industries Private Limited, SML Films Limited, Sparsh Industries Private Limited, Surya Global Flexifilms Private Limited and Uflex Limited, have filed letters supporting the application filed by the applicants. Other than the applicants and supporters, there are 4 other producers that have neither supported nor opposed the present investigation.
8. It is noted that Uflex Limited and Sparsh Industries Private Ltd., supporters in the present investigation, have separately submitted complete costing and injury information and have requested for inclusion as part of domestic industry. The Authority would examine such request of the producers during the course of the investigation.
9. Further, the applicants have submitted that two domestic producers namely SRF Limited and Polyplex Corporation Limited are related to the exporters of subject goods from the subject countries who have exported the product under consideration into India during the period of investigation. Therefore, the applicants claims that SRF Limited and Polyplex Corporation Limited cannot be considered as eligible to constitute the domestic industry within the meaning of Rule 2(b).
10. The applicants have submitted that they are not related to any exporters in the subject countries or importers of the subject goods in India. Further, they have submitted that they have not imported the subject goods from the subject countries during the period of investigation.
11. In view of the above and after examination of the application filed by the applicants, the Authority notes that the applicants account for more than 25% of the total domestic production in India and along with the supporters, account for more than 90% of the total domestic production in India. Thus, the Authority notes that the applicants account for a major proportion of the total domestic production and constitute domestic industry in terms of Rule 2(b) and the application satisfies the criteria of standing in terms of Rule 5(3) of the Rules.

D. SUBJECT COUNTRIES

12. The subject countries for the present investigation are Bangladesh, China PR, Thailand and the United States of America.

E. PERIOD OF INVESTIGATION

13. The period of investigation considered for the purpose of the present investigation is 1st April 2024 to 31st March 2025 (12 months). The injury analysis period covers the period of investigation and the three preceding financial years, that is, 1st April 2021 – 31st March 2022, 1st April 2022 – 31st March 2023 and 1st April 2023 – 31st March 2024 and the period of investigation.

F. BASIS FOR ALLEGED DUMPING

Normal value for China PR

14. The applicants have claimed that China PR should be treated as a non-market economy and the producers from China PR should be directed to demonstrate that market economy conditions prevail in the industry with regard to production and sales of the subject goods. Unless the Chinese producers show that market economy conditions prevail, their normal value should be determined in terms of Paragraph 7 of Annexure-I to the Rules.
15. Therefore, for the purpose of the present initiation, the Authority has considered China PR to be a non-market economy and determined normal value for China PR based on price payable in India. The normal value has been constructed based on cost of production of the applicants, duly adjusted for selling, general and administrative expenses, with reasonable profit.

Normal value for other countries

16. The applicants have claimed that they did not have access to any evidence of domestic selling prices or actual cost of production in Bangladesh, Thailand and the United States of America. Thus, the applicants have proposed to construct normal value on the basis of best available information, having regard to cost of production, duly adjusted for selling, general and administrative expenses, with reasonable profit.
17. The Authority has accepted the claim of the applicants in respect of the determination of normal value for the subject countries for the purpose of initiation of this investigation.

Export price

18. The export price of the subject goods has been determined by considering CIF price of the subject goods, as reported in the DG Systems data. Price adjustments have been made on account of ocean freight, marine insurance, commission, port expenses, handling charges, inland freight and bank charges to arrive at ex-factory export price.

Dumping margin

19. The normal value and export price of the subject goods have been compared at the ex-factory level, which *prima facie* shows that the dumping margin is above de-minimis level and is significant in respect of product under consideration from the subject countries. Thus, there is sufficient *prima facie* evidence that the product under consideration from subject countries is being dumped in the Indian market by the exporters from the subject countries.

G. INJURY AND CAUSAL LINK

20. Information furnished by the applicants have been considered for assessment of injury to the domestic industry. The applicants have furnished *prima facie* evidence establishing that the subject imports have caused injury to the domestic industry. The applicants have claimed that the volume of imports increased in both absolute terms and in relation to domestic production and demand in India over the injury period. The subject goods were significantly undercutting prices of the domestic industry and the subject imports suppressed and depressed the prices of domestic industry. Despite increased sales, the average inventories of the domestic industry increased. It has been claimed that since the domestic industry reduced its prices below costs to compete with the subject imports, it suffered significant losses, cash losses and negative return on investments.
21. The applicants have also claimed that the subject imports are threatening to cause further injury to the domestic industry in view of the sharp increase in the volume of imports, declining import prices, significant idle capacities available with exporters, capacities in excess of demands, imminent capacity additions in the subject countries, global over supply situation, trade remedial measures and tariff measures imposed by other countries.
22. There is sufficient *prima facie* evidence that injury is being caused to the domestic industry by the dumped imports from the subject countries and that such imports are threatening to cause further injury to the domestic industry.

H. RETROSPECTIVE IMPOSITION OF DUTY

23. The applicants have requested for retrospective imposition of the anti-dumping duty on imports of product under consideration from the subject countries. The applicants have claimed that retrospective imposition is necessary due to the following:
- The subject goods are being significantly dumped into the country.
 - The exporters in the subject countries are dumping the goods in other countries as can be seen from the fact that other countries have imposed trade remedial actions on such countries.
 - Therefore, the importers are likely to have been aware that the exporters from the subject countries practice dumping and that such dumping would cause injury.
 - The volume of imports has increased massively in a very short span of period, that is only one year which has adversely impacted the performance of the applicants.

24. The interested parties may offer their comments in this regard as per time limit given in this notification.

I. INITIATION OF ANTI-DUMPING INVESTIGATION

25. On the basis of the duly substantiated application filed by the applicants, and having satisfied itself, on the basis of the prima facie evidence submitted by the applicants, substantiating dumping of the product under consideration originating or exported from the subject countries, the consequential injury to the domestic industry and a causal link between such alleged dumping and injury, and in accordance with Section 9A of the Act read with Rule 5 of the Rules, the Authority, hereby, initiates an anti-dumping investigation to determine the existence, degree, and effect of the dumping with respect of the product under consideration originating in or exported from the subject countries and to recommend the appropriate amount of anti-dumping duty, which if levied, would be adequate to remove the injury to the domestic industry.

J. PROCEDURE

26. The principles as given in Rule 6 of the Rules will be followed in the present investigation.

K. SUBMISSION OF INFORMATION

27. All communication should be sent to the Authority via email at email addresses jd11-dgtr@gov.in and dir14-dgtr@gov.in with a copy to adv11-dgtr@gov.in and consultant-dgtr@govcontractor.in. It should be ensured that the narrative part of the submission is in searchable PDF/MS-Word format and data files are in MS-Excel format.
28. The known producers/exporters in the subject countries, the Governments of the subject countries through its embassies in India, and the importers and users in India who are known to be associated with the subject goods are being informed separately to enable them to file all the relevant information within the time limits mentioned in this initiation notification. All such information must be filed in the form and manner as prescribed by this initiation notification, the Rules, and the applicable trade notices issued by the Authority.
29. Any other interested party may also make a submission relevant to the present investigation in the form and manner as prescribed by this initiation notification, the Rules, and the applicable trade notices issued by the Authority within the time limits mentioned in this initiation notification.

30. Any party making any confidential submission before the Authority is required to make a non-confidential version of the same available to the other interested parties.
31. Interested parties are further advised to keep a regularly watch on the official website of the Directorate General of Trade Remedies (<https://www.dgtr.gov.in>) for any updated information with respect to this investigation as well as further processes related to the investigation.

L. TIME LIMIT

32. Any information/submission relating to the present investigation should be sent to the Authority via email at email addresses jd11-dgtr@gov.in and dir14-dgtr@gov.in with a copy to adv11-dgtr@gov.in and consultant-dgtr@govcontractor.in, within thirty (30) days from the date of receipt of this notice as per Rule 6(4) of the Rules. It may, however, be noted that in terms of explanation of the said Rule, the notice calling for information and other documents shall be deemed to have been received within one week from the date on which it was sent by the Designated Authority or transmitted to the appropriate diplomatic representative of the subject country. If no information is received within the prescribed time limit or the information received is incomplete, the Authority may record its findings based on the facts available on record and in accordance with the Rules.
33. All the interested parties are hereby advised to intimate their interest (including the nature of interest) in the instant matter and file their questionnaire responses within the above time limit.
34. Where an interested party seeks additional time for filing of submissions, it must demonstrate sufficient cause for such extension in terms of Rule 6(4) of the AD Rules and such request must come within the time stipulated in this notification.

M. SUBMISSION OF INFORMATION ON CONFIDENTIAL BASIS

35. Where any party to the present investigation makes any confidential submissions or provides information on a confidential basis before the Authority, such party is required to simultaneously submit a non-confidential version of such information in terms of Rule 7(2) of the Rules and in accordance with the relevant trade notices issued by the Authority in this regard. Failure to adhere to the same may lead to rejection of the response / submissions.
36. Such submissions must be clearly marked as “confidential” or “non-confidential” at the top of each page. Any submission that has been made to the Authority without such markings shall be treated as “non-confidential” information by the Authority, and the Authority shall be at liberty to allow other interested parties to inspect such submissions.

37. The confidential version shall contain all information which is, by nature, confidential, and/or other information, which the supplier of such information claims as confidential. For the information which is claimed to be confidential by nature, or the information on which confidentiality is claimed because of other reasons, the supplier of the information is required to provide a good cause statement along with the supplied information as to why such information cannot be disclosed.
38. The non-confidential version of the information filed by the interested parties should be a replica of the confidential version with the confidential information preferably indexed or blanked out (where indexation is not possible) and such information must be appropriately and adequately summarized depending upon the information on which confidentiality is claimed.
39. The non-confidential summary must be in sufficient detail to permit a reasonable understanding of the substance of the information furnished on a 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 7 of the anti-dumping Rules, 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.
40. The interested parties can offer their comments on the issues of confidentiality claimed in the submissions by the interested parties within seven (7) days from the date of circulation of the non-confidential version of the documents in terms of relevant paragraph of this initiation notification.
41. Any submission made without a meaningful non-confidential version thereof or a sufficient and adequate cause statement in terms of Rule 7 of the Rules, and appropriate trade notices issued by the Authority, on the confidentiality claim shall not be taken on record by the Authority.
42. The Authority may accept or reject the request for confidentiality on examination of the nature of the information submitted. If the Authority is not satisfied that the request for confidentiality is warranted or if the supplier of the information is either unwilling to make the information public or to authorize its disclosure in generalized or summary form, it may disregard such information.
43. The Authority on being satisfied and accepting the need for confidentiality of the information provided, shall not disclose it to any party without specific authorisation of the party providing such information.

N. INSPECTION OF PUBLIC FILE

44. A list of registered interested parties will be uploaded on the DGTRs website along with the request therein to all of them to email the non-confidential version of their

submissions/ responses/ information to all other interested parties. Failure to circulate non-confidential version of submissions/ response/ information might lead to consideration of an interested part as non-cooperative.

O. NON-COOPERATION

45. In case any interested party refuses access to, or otherwise does not provide necessary information within a reasonable period or within the time stipulated by the Authority in this initiation notification, or significantly impedes the investigation, the Authority may declare such interested party as non-cooperative, record its findings based on the facts available and make such recommendations to the Central Government as it deems fit.



(Siddharth Mahajan)
Designated Authority