

**FINAL REPORT ON THE RESULTS OF THE ANTI-DUMPING INVESTIGATION
TOP DUPLEX PACKAGING PAPERCARD PRODUCTS
ORIGINATING FROM THE REPUBLIC OF KOREA, MALAYSIA,
AND TAIWAN**

UNSECRET VERSION

**INDONESIAN ANTI-DUMPING COMMITTEE
MINISTRY OF TRADE OF THE REPUBLIC OF INDONESIA**

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**FINAL REPORT ON THE RESULTS OF THE ANTI-DUMPING INVESTIGATION ON DUPLEX BOARD PRODUCTS
ORIGINATING FROM THE REPUBLIC OF KOREA, MALAYSIA, AND TAIWAN**

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A. INTRODUCTION

A.1. BACKGROUND

1. The investigation was conducted based on an application letter dated March 15, 2024, submitted by PT Indah Kiat Pulp & Paper Tbk, hereinafter referred to as the Applicant. The Applicant is a Domestic Industry (IDN) that produces *duplex board*. The product is included in tariff items ex 4810.32.90 and ex 4810.92.90 (Indonesian Customs Tariff Book - BTKI 2022). The application is related to an anti-dumping investigation of *duplex board* imports originating from the Republic of Korea, Malaysia, and Taiwan. The complete and correct application was received by the Indonesian Anti-Dumping Committee (KADI) on July 31, 2024, and notification was immediately made to the representatives of the accused countries. KADI began the investigation on September 10, 2024.
2. In accordance with the provisions of Article 13 paragraph (2) letter b of Government Regulation Number 34 of 2011 (PP 34/2011) and Article 6.9 of the Agreement on Implementation of Article VI of GATT 1994, namely the *Anti-Dumping Agreement* (ADA), KADI publishes the Main Data Report (*Essential Facts*) of the results of the investigation.
This report will be the basis for the final decision on the results of the anti-corruption investigation. dumping of imported *duplex board products*.
3. In accordance with the provisions of Article 10 paragraph (1) of PP 34/2011 and Article 12.2 ADA, KADI will issue a final report on the results of the anti-dumping investigation into the import of *duplex board*. This report will be the basis for KADI's recommendations regarding Anti-Dumping Import Duty (BMAD) on the import of *duplex board products*.

A.2. PROCEDURE

4. In accordance with Article 7 paragraph (1) of PP 34/2011 and Article 5.5 ADA, on July 31, 2024, KADI will conduct a pre-notification to the government representatives of the accused countries, namely through the Embassies of the Republic of Korea, Malaysia, and Taiwan in Indonesia. This pre-notification is a notification regarding the receipt of a complete application for an anti-dumping investigation into the import of *duplex board* originating from these three countries.
5. KADI determined that the IDN application met the requirements for submitting preliminary evidence. This preliminary evidence concerns the occurrence of dumping, the losses suffered by the applicant, and the causal relationship between the two, allowing for an investigation to be initiated.
6. KADI announced the initiation of an antidumping investigation into *duplex board* products originating from the Republic of Korea, Malaysia, and Taiwan on September 10, 2024, through the *Bisnis Indonesia* daily. The announcement was also officially conveyed to all interested parties, accompanied by the sending of questionnaires to domestic industries, exporters, and/or

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Exporters, producers, and importers identified in the application. KADI also provides an opportunity to submit written responses and request a hearing *with* interested parties.

no later than 14 (fourteen) working days from the announcement date, namely September 23, 2024.

7. Interested parties who are identified in the application and who returning the questionnaire (cooperative) is:

a. Domestic Industry:

PT Indah Kiat Pulp & Paper Tbk (**cooperative**).

b. Supporting Domestic Industry:

PT Fajar Surya Wisesa Tbk. (**cooperative**).

c. Exporter/Producer Exporter

1) Republic of Korea

a) Hansol Paper (**cooperative**, company name: Hansol Paper Co., Ltd);

b) KleanNara Co., Ltd;

c) Seha Corp. (Hankuk Paper Mfg., Co., Ltd); And

d) Hanchang Paper Co., Ltd. (**cooperative**).

2) Malaysia

XSD International Paper Sdn Bhd (**cooperative**)

3) Taiwan

a) Kuan Yuan Paper Mfg., Co., Ltd;

b) Yuen Foong Yu Paper Mfg., Co., Ltd; And

c) Cheng Loong Corporation.

d. Importer

1) Bright Sun;

2) Amerta Niagatama (**cooperative**, company name: PT Amerta Niagatama);

3) Setyamisra Kemas Lestari (**cooperative**, company name: PT Setyamisra Kemas Lestari Tbk);

4) Indonesian DNP;

5) Anugerah Jaya Maju Abadi Indobox (**cooperative**, company name: PT Anugerah Jaya Maju Abadi Indobox);

6) Aneka Andalan Asia (**cooperative**, company name: PT Aneka Asia's flagship);

7) Embossindo (**cooperative**, company name: PT Embossindo Utama);

8) Solo Murni (**cooperative**, company name: PT Solo Murni);

9) Cinjoe Jaya Perkasa Muda (**cooperative**, company name: PT Cinjoe Jaya Perkasa Muda);

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- 10) Catur Sukses Makmur (**cooperative**, company name: PT Catur Prosperous Success); and
 - 11) Paper & Finishing Services.
8. There are 4 (four) additional companies that submitted questionnaire answers (**cooperatively**) outside the list of companies known in the application, namely:
- a. Companies in the Republic of Korea
Hansol PNS Co., Ltd., is an affiliated *trading company* of Hansol Paper Co., Ltd for domestic sales.
 - b. Companies in Malaysia
XSD Bentong Sdn., Bhd., is an affiliated company of XSD International Paper for export sales.
 - c. Importer
 - 1) PT Printec Perkasa; and
 - 2) PT Grafitecindo Ciptaprima.
9. From the information above, it can be seen that there is not a single exporter and/or Taiwanese exporter-producers who submitted questionnaire responses. Therefore, to determine the BMAD of Taiwanese exporters and/or producers, KADI will use the best available data in the investigation .
10. Of all cooperative exporters and/or producer exporters, in this investigation KADI can only conduct field verification on Hansol Paper Co., Ltd., and Hansol PNS Co., Ltd. This is due to resource limitations.
11. KADI has conducted field verification at:
- a. PT Indah Kiat Pulp & Paper Tbk as IDN on February 5-7, 2025; and
 - b. Hansol Paper Co., Ltd (manufacturer exporter) and Hansol PNS Co., Ltd (*domestic* traders) in the Republic of South Korea on June 17 - 19, 2025.
12. In connection with the large number of responses submitted in the investigation, in accordance with Article 9 of PP 34/2011 and *Article* 5.10 ADA, on August 12, 2025, KADI extended the investigation period to a maximum of 18 (eighteen) months.
13. On August 12, 2025, KADI issued a Master Data Report, which was submitted to all interested parties who cooperated with the investigation. Confidential dumping margin calculation documents were submitted to each exporter and producer concerned as an attachment. KADI provided the interested parties who cooperated with the investigation with the opportunity to submit their responses.

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report until August 20, 2025. KADI also provides an opportunity for the parties to submit a hearing *until* August 27, 2025.

14. In accordance with Article 13 paragraph (1) PP 34/2011 and *Article* 6.2 ADA, KADI has held a public hearing *on* September 24 2025. KADI also conducted a confidential special hearing on September 23 and 24, 2025, with the companies that submitted the request .

15. The *duplex board* investigation period is:

- a. Loss period: January - December 2021 (P1), January - December 2022 (P2), January - December 2023 (PP); and
- b. Dumping Investigation Period (PP): January - December 2023.

A.3. DETERMINING DUMPING MARGIN

16. In calculating the dumping margin, KADI uses questionnaire data from producers or exporters from countries accused of dumping. The *ad valorem* dumping margin is calculated by subtracting the normal value from the ex-factory export price, then dividing by with the CIF price to obtain a percentage. The specific dumping margin is determined based on the difference between the normal value and the export price (ex-factory). This ensures that the normal value and export price are at the same trading level (*fair comparison*).

17. Cost of Goods Sold (COGS)

If a producer or exporter produces more than one type of goods, the cost data for the Goods Under Investigation must be determined based on the cost allocation for each type of goods. If the cost allocation is deemed not to reflect the actual costs, KADI will make reasonable adjustments. These adjustments will be communicated to the producer or exporter concerned.

18. The calculation of dumping margins carried out by KADI for producers or producer exporters is submitted separately to each producer or producer exporter as an attachment to this main data report.

A.3.1. Normal Values

19. Domestic sales transaction data can be used to calculate normal value if it meets the requirements of ordinary *course of trade*.

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20. Adequacy Test

In calculating normal values, sales data from producers or exporters can be used if the total domestic sales volume is $\geq$ 5% of the total export sales volume to Indonesia.

21. Profitability Test

If the profitable sales volume is less than 20%, these transactions are ignored and the construction method is used. If the profitable sales volume is 20%-80%, only profitable transactions are used in the normal value calculation. If the profitable sales volume is greater than 80%, all sales transactions are used in the normal value calculation.

22. The normal value of each producer and/or producer exporter is generally determined based on the weighted average of domestic sales transactions during the investigation period. The normal value is the domestic selling price at the ex-factory level.

23. The calculation of the domestic ex-factory price is done by reducing the domestic selling price by *allowances*. *Allowances* that can be used in the calculation are those related to direct selling costs outside the factory, and can be traced from company data related to the sale of the goods being investigated.

24. Goods Control Code (KKB) is a goods coding system in the form of a combination of letters, numbers and/or symbols designed to provide a special identity for each item. The KKB is created for the purpose of identification and comparison between similar goods and the goods being investigated.

If exports for a particular KKB are not sold domestically, the normal value is calculated using the constructed *normal value method*. This calculation is based on domestic production costs, selling costs, general and administrative costs, and a reasonable profit for the KKB in question.

A.3.2. Export Prices

25. The export price is the selling price of the Goods Under Investigation in the Indonesian customs area. Meanwhile, the ex-factory export price is determined based on the weighted average of all export sales transactions to Indonesia during the Investigation Period, minus any acceptable *allowances*.

B. INVESTIGATION

B.1. INVESTIGATED ITEMS AND SIMILAR ITEMS

26. On July 16, 2025, October 29, 2025 and November 11, 2025, KADI coordinated with the Directorate General of Customs and Excise, the Tax Policy Agency

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Trade, Ministry of Industry, Center for Standardization and Cellulose Industry Services and the Applicant. For ease of implementation in the field related to the collection of BMAD, the description of the goods investigated is **“multilayer paperboard (ranging from 210 to 450 grams/sqm) with a predominantly white top surface and a gray back surface”** originating from the Republic of Korea, Malaysia, and Taiwan, which are included in tariff headings ex. 4810.32.90 and ex. 4810.92.90.

27. The *duplex board* products produced by the Applicant are similar goods to the investigated goods imported from the Republic of Korea, Malaysia and Taiwan, both in terms of characteristics and use.

Based on BTKI 2022, the Goods Under Investigation are included in the tariff heading as can be seen in Table 1.

Table 1. Description of the Items Investigated

HS Number	Item Description
48.10	Paper and paperboard, coated on one or both sides with kaolin (China clay) or other inorganic substances, with or without a binder, and without other coatings, whether or not surface colored, decorated or printed, in rolls or rectangular (including square) sheets of any size.
4810.32	- - Uniformly bleached throughout, and containing more than 95% by weight of the total fibre content of wood fiber obtained by chemical processing, and weighing more than 150 g/m ² :
ex.4810.32.90	- - - Etc
4810.92	- - Multi-layer:
ex.4810.92.90	- - - Etc

Source: BTKI 2022.

28. The use of *duplex board* is mainly for carton/box packaging (*folding cartons*) for various consumer needs and industrial products such as pharmaceuticals, toiletries, food, powdered drinks, electrical equipment, shoes, garments, etc.

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B.2. DOMESTIC INDUSTRY

B.2.1. Domestic Industrial Production Volume

Table 2. Percentage of Indonesian *Duplex Board* Production in PP

No.	Company name	%
1. Applicant (IDN)		36
	PT Indah Kiat Pulp & Paper Tbk	36
2. Idn Supporter		25
	of PT Fajar Surya Wisesa Tbk + PT Dayasa Aria Prima (1 Group)	25
	Applicant + Supporter of the	61
3. domestic industry (idn) of similar goods that do not support or do not reject	PT Gaya Baru Paperindo PT Mega Surya	39
	Eratama PT Pakerin	2
		9
		10
	PT Papyrus Sakti	8
	PT Suparma Tbk	10
	Total National Production	100

Source: IDN, processed

29. Based on Table 2 above, the Applicant's total production is 36% of the total national production. In this investigation, the Applicant received support from other IDNs whose production percentage is 25% of the national production. Thus, the Applicant has fulfilled the requirements to represent IDN as stated in Article 4 paragraph (3) and Article 6 paragraph (1) letter a of PP 34/2011 and *Article 5.4 ADA*. For additional information, this investigation application received support from the Indonesian Pulp and Paper Association (APKI).

B.2.2. Production Process

30. The following is the *duplex board production process*:

a. Formation (Wire Section)

Forming is a crucial step in the *duplex board* manufacturing process, involving the transformation of paper pulp into a continuous sheet of paper on a paper machine. In the forming stage, the pulp is pumped onto a moving screen or wire mesh. As the pulp moves along the screen, water is drained off. At this stage, the fibers begin to bond together to form a wet paper web.

The consistency and flow rate of the pulp are controlled to ensure that the paper sheet has the desired characteristics in terms of strength, smoothness and thickness.

b. Pressing

The pressing stage involves removing water from the wet paper web using three sets of *rollers* or presses. This process aims to squeeze out the water and flatten the paper. This process helps

The pressing process increases the density, strength, and smoothness of the paper, removes excess water (which can be up to 50% of the paper weight), and consolidates the paper fibers. The pressing process follows the forming and initial drying stages of the paper machine. As the paper web is squeezed between *rollers*, the fibers become flat and compacted, resulting in a denser and stronger paper product.

c. Drying

Drying is an important process in the manufacture of *duplex board*. After the pulp is formed into sheets of paper and pressed to remove excess water, the drying stage involves the paper web passing through a series of heated cylinders or other drying methods to remove excess water and bring the paper to its final moisture content. The drying section of a paper machine consists of six sets/groups of primary dryers. These dryers are heated and arranged in a specific sequence to gradually reduce the water content of the paper web. As the paper passes through the drying section, the temperature increases and the moisture level decreases, allowing the remaining water to evaporate.

d. Surface Measurement

On a paper machine, a sizing press is used to coat the surface of the paper with a starch solution or other material. The paper is then dried.

In addition, at this stage the dust level will be reduced, stiffness will increase, and air permeability will be reduced.

e. Coating

In this coating process, the paper surface is coated with a material to improve its properties, including brightness, opacity, smoothness, and printability. This coating can be applied to one or both sides of the paper and can be water-based or solvent-based. This coating process is carried out after the paper is finished and before it is rolled into the finished product, using a knife coating method. After the coating is applied, the paper is dried by passing it through an infrared air dryer and a drying hood.

f. Calendaring

Calendering is the next step in the papermaking process, used to improve the surface properties of the paper, including smoothness, gloss, and printability. In this *calendering* process ,

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The paper sheet passes through a series of heated *rollers* under high pressure. The *calendering* process can be divided into two types:

- 1) *Soft calendering*: This process uses a series of heated *rollers* at relatively low pressure. The process aims to improve the surface properties of the coated paper.
- 2) *Hard calendering*: This process uses a series of heated *rollers* under high pressure, which can reach 1000 pounds per linear inch (PLI). The process is used to improve surface properties, increase the paper's bulk and stiffness, and make it more resistant to tearing and wrinkling.

g. Rolling

The rolling process is the final process where the aim of this stage is to make it easier to store the paper. The process is carried out using a paper machine at high speed.

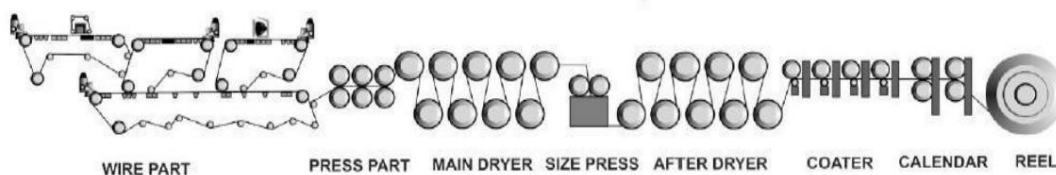


Figure 1. Duplex Board Production Process

B.3. DUMPING MARGIN CALCULATION

31. KADI calculates dumping margins for each company that cooperates in the investigation. Detailed calculations are submitted separately to each producer or exporter as an attachment to this main data report.

Republic of Korea

32. Hansol Paper Co., Ltd. (hereinafter referred to as Hansol)

Hansol is a *duplex board* exporter in the Republic of Korea, selling its products domestically and for export. Hansol is affiliated with Hansol PNS Co., Ltd. This affiliated company sells *duplex board* only domestically.

In this investigation, Hansol submitted a request for a special hearing on September 24, 2025. The meeting discussed Dumping margin calculation, where KADI does not include warehouse rent in domestic sales. This expense is claimed by the company as *an allowance* in calculating normal value.

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Export Price

The export price for this company is calculated from 4 KKB *duplex boards* exported to Indonesia.

Normal Values

Based on the results of the adequacy test, all domestic transactions can be used in calculating normal value. The normal value for this company is calculated based on four *duplex board* vehicle ownership contracts exported to Indonesia, which are identical to the four vehicle ownership contracts sold domestically. Based on the profitability test results, all transactions for these four vehicle ownership contracts can be used in calculating normal value.

In calculating this normal value, KADI has verified the evidence and information presented by the company during a special public hearing. This has been confirmed in the verification data and the company's financial statements, so KADI has adjusted the normal value calculation based on the evidence presented.

Margin Dumping

After adjusting the normal value calculations according to the evidence and information provided by the company and it is acceptable, then

The dumping margin calculation for Hansol is 4.04% (*ad valorem*) or USD 0.024 per kg (specific).

33. Hanchang Paper Co., Ltd. (hereinafter referred to as Hanchang)

Hanchang is a *duplex board* manufacturer exporter in the Republic of Korea that sells its products in the domestic and export markets.

Export Price

On September 23, 2025, Hanchang filed a special hearing regarding the calculation of dumping margins. In this case, discrepancies were found in the data used in calculating export prices for sales to Indonesia.

KADI uses the CIF *term*, while Hanchang sells products to Indonesia using the FAS (*free alongside ship*) *term*.

The export price for this company was calculated based on four *duplex board* KKBs exported to Indonesia and adjusted based on the company's reported facts. Therefore, KADI uses the FAS term in calculating the ex-factory export price.

Normal Values

Based on the results of the adequacy test, adjusted for the results of the special hearing, all domestic transactions can be used in calculating the normal value. The normal value for this company is calculated based on four identical *duplex board* KKBs exported to Indonesia.

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with four vehicle registration certificates sold domestically. Based on profitability tests, of the four identical vehicle registration certificates exported to Indonesia, three were sold at a loss, and the normal value calculation was performed using the construction method. Meanwhile, one vehicle registration certificate had a profitable transaction volume exceeding 20%.

In a special hearing on September 23, 2025, KADI inquired about the cost of *raw material* inputs to the cost structure of *duplex board manufacturing*. Hanchang provided a statement that differed from the data presented in the questionnaire. Hanchang requested additional time to answer all questions posed by KADI, so that on September 24, 2025, Hanchang was given an additional opportunity to provide answers and clarifications regarding the data presented in the questionnaire. KADI was able to accept Hanchang's response regarding the term FAS. However, KADI could not accept the allocation method used by the company because there was a discrepancy with the data submitted. In addition, there were irregularities in the allocation method and proportion of the cost structure used by Hanchang. Therefore, in calculating Hanchang's cost structure, KADI conducted allocation and construction calculations using the company's financial data.

Margin Dumping

Based on the calculation results, the dumping margin for Hanchang is 26.52% (*ad valorem*) or USD 0.14 per kg (specific).

34. Dumping margins for companies other than those mentioned above will be subject to the highest dumping margin from cooperative companies, namely 26.52% (*ad valorem*) or USD 0.14 per kg (specific).

Malaysia

35. XSD International Paper Sdn. Bhd. (hereinafter referred to as XSD)

XSD is a *duplex board* exporter in Malaysia that sells its products domestically. For export, XSD sells through its affiliated sales company (*trader*) , XSD Bentong Sdn. Bhd. The products are then sold to Hong Kong Paper Sources Co., Limited (*trader*).

(unaffiliated) and then exported to Indonesia. XSD also exports to Indonesia through Hong Kong Paper Sources Co., Limited. Hong Kong Paper Sources Co., Limited did not provide any questionnaire responses in this investigation.

Export Price

The export price for this company is calculated from 43 KKB *duplex boards* exported to Indonesia.

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Normal Values

Based on the results of the adequacy test, all domestic transactions can be used in calculating normal value. The normal value for this company was calculated based on 43 *duplex board vehicle ownership* contracts (KKB) exported to Indonesia. Of these 43 KKB, 34 are identical to those sold in the domestic market, and 9 are not sold in the domestic market. Based on the profitability test results, transactions for 28 KKB can be used in calculating normal value. One KKB is only a profitable transaction, while 14 KKB are construction-related.

Margin Dumping

Based on the calculation results, the dumping margin for XSD is 7.79% (*ad valorem*) or USD 0.036 per kg (specific).

36. Dumping margins for companies other than those mentioned above will be subject to the highest dumping margin from cooperative companies, namely 7.79% (*ad valorem*) or USD 0.036 per kg (specific).

Taiwan

37. No companies cooperated in the investigation, so all companies from Taiwan will be subject to the dumping margin amount based on data held by KADI, which is 29.06% (*ad valorem*) or USD 0.14 per kg (specific).

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B.4. ECONOMIC PERFORMANCE OF DOMESTIC INDUSTRY

38. In conducting the loss analysis, KADI uses data from the last 3 years, namely January 1, 2021 to December 31, 2023, which is the year of the investigation.

Table 3. IDN Economic Performance Indicators based on P1 Point Index

No	Indicator	Unit	P1	P2 PP	Trend	
			Point Index			%
1. Domestic sales	2. Domestic sales	MT	100	88	91	(4.45)
3. Operating profit		USD 000	100	95	64	(19.95)
Domestic selling price	Cost	USD 000	100	89	21	(54.66)
4. of goods sold (COGS)		USD/MT 100	108		70	(16.25)
5.		USD/MT 100	136	131		14.46
6. Market Share	7.	%	100	83	85	(7.99)
Installed Capacity	8.	MT	100	100	100	1.65
Capacity Utilization	9.	%	100	87	86	(7.22)
Production		MT	100	87	89	(5.69)
10. Inventory		MT	100	152	58	(23.92)
11. Labor	12. Wages	Organization	100	102	100	0
		USD	100	102	104	1.78
13. Productivity		MT/Org	100	85	90	(4.94)
14. Ability to increase capital*	15. Cash Flow*	%	100	81	78	(11.67)
		USD 000	100	60	127	12.75
16. ROI*		%	100	130	86	(7.35)
17. Asset growth*		%	100	78	(74)	n/a

Source: IDN, processed.

Note: ROI, cash flow, asset growth, and capital raising capabilities are the values of all products.

39. During the investigation period, IDN's domestic sales decreased in both volume and value by 4.45% and 19.95%, respectively. At the same time, operating profit and domestic selling price also decreased by 54.66% and 16.25%, respectively. Meanwhile, IDN's COGS increased by 14.46%.

40. IDN's declining domestic sales have caused IDN's market share to also decline with a trend of 7.99%.

41. Table 3 also shows that during the investigation period, installed capacity increased by a trend of 1.65% due to machine failure in 2023, which required the company to replace (*upgrade*) machine parts. This was necessary to increase annual production speed. However, production volume actually decreased by a trend of 5.69%. The increase in capacity and the decrease in

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This production causes capacity utilization to decrease with a trend of 7.22%.

42. The decline in production capacity utilization (7.22%), the decline in production volume (5.69%), and the decline in domestic sales volume (4.45%) also caused a decline in IDN inventory with a trend of 23.92%.
43. However, even though IDN production has decreased, the number of workers has not changed, so that productivity remains the same.
decreased by a trend of 4.94%. At the same time, IDN must continue to increase its workforce wages, in accordance with the Provincial Minimum Wage (UMP) set by the local government.
44. Based on the data and description above, it can be concluded that IDN experienced losses considering that productivity, domestic sales, production decreased and the UMP increased.
45. The table above shows that IDN's overall performance indicates that the company's ability to increase capital and *Return on Investment* (ROI) has decreased, with a trend of 11.67% and 7.35%, respectively. For the asset growth indicator, which was at P1 100 index points, even negative (74) index points at the time of PP.
46. However, the same table also shows that *cash flow* data
The company experienced a 12.75% increase in revenue. Unlike the data analyzed above, which was for goods suspected of being affected by dumping, ROI, *cash flow*, asset growth, and capital raising capacity were data for all goods produced by the Applicant/IDN.
47. Based on the analysis of economic performance indicators, it can be concluded that IDN experienced material losses as indicated by a decline in domestic sales both in terms of volume and value, operational profit, domestic selling price, market share, capacity utilization, production, productivity, ROI, and asset growth.

B.5. CAUSE-EFFECT RELATIONSHIP

B.5.1 Volume Impact

B.5.1.1 Absolute Volume Impact

48. In contrast to the continued decline in domestic sales of Indonesia (4.45%), Indonesia's *duplex board* imports have actually increased, as seen in Table 4 with a trend of 50.70%. In fact, total *duplex board* imports
The proportion of goods originating from countries accused of dumping increased significantly (54.27%). This indicates that the Indonesian domestic market is increasingly dominated by imported goods.

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Table 4. Development of Indonesian *Duplex Board* Import Volume (P1-PP)

Country	Unit	P1	P2	PP	Trend (%)
The country is accused of dumping	MT	21,784	46,744	51,844	54.27
Republic of Korea	MT	21,436	39,657	27,386	13.03
Malaysia	MT	0	1,501	16,881	n/a
Taiwan	MT	348	5,586	7,577	366.62
Other Countries	MT	33,213	54,501	73,057	48.31
Total Imports	MT	54,997	101,245	124,901	50.70

Source: Central Statistics Agency, processed.

B.5.1.2 Relative Impact of Volume on National Consumption

49. According to the Minister of Finance Regulation (PMK) Number 26/PMK.010/2022 concerning the Determination of the Goods Classification System and Exemption from Import Duty Tariffs on Imported Goods, the MFN import duty rate for *duplex board* is 5%. Meanwhile, the preferential rates for *duplex boards* can be seen in Table 5.

Table 5. *Duplex Board* Preferential Rates in Indonesia

No.	Country	Agreement International	Minister of Finance Regulation concerning	Rate (%)
1. Republic of Korea		RCEP – Korea	Tariff Determination 223/PMK.010/2022	0
		IKCEPA	227/PMK.010/2022	0
2. Malaysia		ASEAN – RCEP	221/PMK.010/2022	0
		ATIGA	43/PMK.010/2022	0

Source: INSW

50. Indonesia does not yet have an international agreement with Taiwan. Therefore, imported duplex board from Taiwan is subject to MFN tariffs in accordance with Minister of Finance Regulation No. 26/PMK.010/2022 concerning the Establishment of a Goods Classification System and Exemption from Import Duty Tariffs on Imported Goods.
51. Even though there are preferential tariffs, in this case RCEP, ATIGA, and IKCEPA, if it is proven that there is BMAD, BMAD can still be imposed.
This is because BMAD is an additional import duty from the general import duty (*Most Favored Nation*) or preferential import duty based on international agreements.
52. Table 6 shows that the development of total domestic sales of Indonesian *duplex boards* obtained from total domestic sales volume (IDN and other IDN) has decreased, although not significantly (trend 6.66%).
In fact, during the three-year investigation period, national *duplex board* consumption increased from 100 index points in P1 to 108 index points in PP (a 3.85% trend). At the same time, imports from the country accused of dumping actually experienced a very significant increase, with a trend of 48.60%.
However, on the other hand, the sales volume of domestic products (IDN and idn

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others) experienced a decline with a trend of 7.99% and 5.78% respectively.

**Table 6. Development of National *Duplex Board* Consumption Market Share
Indonesia based on P1 Point Index**

Country	P1	P2	PP	Trends
	Index			%
The country is accused of dumping	100	202	221	48.60
Republic of Korea	100	174	118	8.82
Malaysia ¹	0	100	1,100	1,000,002
Taiwan	100	1,429	1,900	335.89
Other Countries	100	155	204	42.87
Total Imports	100	173	211	45.10
IDN Sales IDN	100	83	85	(7.99)
Sales Others Total Domestic	100	97	89	(5.78)
Sales National Consumption³ 100	100	91	87	(6.66)
Source: BPS; IDN Questionnaire Answers. Processed.		106	108	3.85

Information:

- 1) Malaysia's P1 value is 0, so use the point index on P2
- 2) percentage growth of market share of imported *duplex board* from Malaysia (P2 to PP).
- 3) is the sum of total domestic sales with total import data.

B.5.2 Price Impact

**Table 7. Development of *Duplex Board* Prices in Indonesia based on
P1 Point Index**

No.	Price	P1	P2	PP	Trends
		Point Index			(%)
1.	IDN	100	108	70	(16.25)
2.	Republic of Korea*	100	110	84	(8.30)
3.	Malaysia*	-	100	75	(24.55)**
4.	Taiwan***	100	139	85	(7.78)

Source: BPS and IDN, processed.

*) Import price + Import Duty (Preferential Tariff) + THC

**) is the price growth from P2 to PP

***) Import price + Import Duty (MFN) + THC

53. Table 7 above explains that the selling price of IDN *duplex board* experienced a significant decline (a trend of 16.25%), from 100 index points in P1 to only 70 index points in PP. During the same period, the import price of *duplex board* originating from the Republic of Korea and Taiwan experienced a decline with a trend of 8.30% and 7.78%, respectively. Meanwhile, the import price of *duplex board* originating from Malaysia experienced a decline from 100 index points in P2 to 75 index points in PP.

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Table 8. Impact of *Duplex Board* Prices in Indonesia based on the IDN P1 Point Index

No.	Price	P1	P2	PP	Trends
		Point Index			%
1.	IDN	100	108	70	(16.25)
2.	Republic of Korea ¹	91	100	77	(8.30)
3.	Malaysia ¹	0	83	62	(24.55) ²
4.	Taiwan ¹	79	109	67	(7.78)
Price Undercutting³					
5.	Republic of Korea	9	8	(7)	n/a
6.	Malaysia	0	25	8	n/a
7.	Taiwan	21	(2)	3	n/a
Price Suppression					
8.	IDN HPP Difference	62	85	81	14.46
9.	4 Source:	38	23	(11)	n/a

BPS and IDN, processed.

1) Import price + MFN + THC

2) Percentage growth in the price of imported *duplex board* from Malaysia (P2 to PP)

3) The difference between the price of IDN *duplex board* and the price of imported *duplex board* from the accused country dumping

4) Difference between IDN price and IDN HPP

54. A comparison of the development of IDN selling prices with *duplex board* import prices during the investigation period can be seen in Table 7. This table illustrates the increase or decrease in *duplex board* import prices compared with IDN prices at P1.

55. *Price undercutting* is a situation where the price of imported *duplex board* from the country accused of dumping is sold below the price of *duplex board* from Indonesia. This means, if the difference between the two prices is positive, then *price undercutting has occurred*. Table 8 shows that *price undercutting* occurred in imported *duplex board* products from Malaysia and Taiwan, amounting to 8 and 3 index points, respectively. For the Republic of Korea, in P1 and P2 the import price of the Republic of Korea was always below the selling price of Indonesia, indicating price undercutting, amounting to 9 and 8 index points, respectively. In PP, the import price from the Republic of Korea was above the selling price of Indonesia and the data shows no *price undercutting* (-7 index points). However, this actually occurred because Indonesia had sold below the HPP so that it seemed as if the company in the Republic of Korea did not carry out *price undercutting*.

56. Table 8 above shows that domestic prices declined by 16.25% during the investigation period (*price depression*). At the same time, Indonesia's HPP increased by 14.46%, almost identical to the downward trend in IDN prices. This indicates Indonesia's tendency to consistently sell below its HPP (selling at a loss).

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This situation was marked in the PP period where the domestic price of IDN (70 index points) was lower than the HPP (81 index points), or a loss. by 11 index points.

57. *Price suppression* is a condition where Indonesia's domestic market (IDN) cannot increase its selling price to reflect an increase in the cost of goods sold (COGS) due to the presence of imported goods at lower prices. Based on the above information, it can be said that Indonesia is experiencing *price suppression* from all three countries. Regarding the Republic of Korea's price, which is higher than Indonesia's price at the cost of goods sold (COGS), this occurs because Indonesia is already selling below the COGS.

58. *Price depression* is a condition where IDN is forced to lower its selling prices due to pressure from import prices that contain dumping.

Based on the information above, this prolonged pressure on import prices has forced Indonesia's domestic market (IDN) to lower its selling price (P1 - PP) to compete with imported goods. IDN has even sold below the cost of goods sold (COGS). Ultimately, this situation will reduce profits and even lead to losses for IDN.

59. Based on numbers 48 to 58, there is a causal relationship between dumping and losses which is characterized by the occurrence of volume impacts both absolutely and relatively and the occurrence of price impacts (*price undercutting*, *price depression*, and *price suppression*).

B.6. OTHER FACTORS

B.6.1 Applicant's Export Development

Table 9. IDN Sales Volume based on Domestic P1 Point Index

No.	Description	P1		P2		PP		%
		Index Points	%	Index Points	%	Index Points	%	
1.	Domestic	100	69.36	88	74.35	91	69.84	(4.45)
2.	Export	44	30.64	30	25.65	39	30.16	(5.53)
3.	Total	144	100.00	118	100.00	131	100.00	(4.78)

Source: IDN processed.

60. Table 9 above shows that during the investigation period, IDN's total sales volume, both in the domestic and export markets, experienced a decline with a trend of 4.78%, although its percentage of total sales remained relatively unchanged. The same table shows that the proportion of IDN sales IDN's domestic sales were more dominant than its export sales. Therefore, IDN's losses in this investigation were primarily due to disruption to the domestic market (dumping).

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B.6.2 National Consumption

61. Using Table 6 and the explanation in point 47, it can be seen that during the investigation period, national *duplex board* consumption experienced an increase with a trend of 3.85%. This increase should have been utilized by IDN, however, the same table shows that the increase was actually utilized more by dumped imported goods (trend 48.60%). Meanwhile, the domestic sales trend actually decreased by 6.66%.

B.6.3 TECHNOLOGY

62. Based on data and information from IDN and from cooperative exporters or producers, as well as *on-site verification*, the technology used by the domestic industry to produce *duplex board* is no different from the technology used by producers in the Republic of Korea, Malaysia, and Taiwan. This technology is German technology.

B.7. RESPONSE OF INTERESTED PARTIES

All of the following responses are written responses received by KADI from companies that cooperated with the investigation following the publication of the Key Data Report and public hearing.

B.7.1 Hansol Paper Co., Ltd. (Exporter)

63. Low Margin and De Minimis

Hansol's dumping margin is low and approaches the de minimis threshold as stipulated in Article 6 paragraph (2) of PP 34/2011 and Article 5.8 of the WTO Anti-Dumping Agreement. Based on these provisions, the investigation into Hansol must be stopped because the margin is not sufficient to cause material harm.

Answer:

Based on the results of the investigation, KADI found dumping carried out by Hansol (4.04%). The investigation into Hansol cannot be stopped, because according to Article 6 paragraph (2) of PP 34/2011 and Article 5.8 ADA, the de minimis threshold for dumping margin is 2%.

64. Appropriate Cost Reductions Must Be Accepted

KADI's refusal to deduct the [HOLD] cost is contrary to the fair comparison requirement set out in Article 2.4 of the WTO Anti-Dumping Agreement. Documented selling costs that affect price comparability, including the [HOLD] cost, must be appropriately deducted from the normal value. Hansol's [HOLD] cost is fully traceable, compliant with K-GAAP, and audited.

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so it must be accepted as a legitimate reduction in the margin calculation.

Answer:

KADI can accept the response submitted by Hansol and has adjusted the calculation of dumping margins, as stated in number 32.

65. No Price Decrease in the Last Period

KADI's own Main Data Report shows that in the most recent investigation period (PP), Hansol's export prices were above domestic industry prices, indicating no price *undercutting* and no causal relationship with losses.

Answer:

In Section B.5.2 the impact of prices, even though there is no *price undercutting*, However, *price depression* and *price suppression* occurred during the investigation period. This is reinforced by Article 3.2 of the ADA, which states:

*"... With regard to the effect of the dumped imports on prices, the investigating authorities shall consider whether there has been a significant price undercutting by the dumped imports as compared with the price of a like product of the importing Member, or whether the effect of such imports is otherwise to depress prices to a significant degree or prevent price increases, which would otherwise have occurred, to a significant degree. **No one or several of these factors can necessarily give decisive guidance**"*

66. Consideration of National Interests

Based on Article 25 paragraph (1) of PP 34/2011, KADI is required to consider national interests before imposing import duties. Hansol duplex board is an important raw material for the packaging, printing, FMCG, and food & beverage sectors. Imposing import duties will harm the much larger downstream industry, reduce competitiveness, and burden Indonesian consumers.

Answer:

KADI's task is to handle problems related to efforts to prevent the import of dumped goods and goods containing subsidies.

Matters related to considerations of national interests will be discussed in meetings between ministries/institutions before the Minister of Trade accepts or rejects the recommendations submitted by KADI (Article 25 of PP 34/2011).

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67. No Cause-Effect Relationship

It is clear that there is no causal relationship as alleged and concluded by KADI. This is because the primary cause of Indonesia's declining domestic sales and price depreciation stems from domestic industry challenges and policy-driven cost factors, resulting in suboptimal efficiency, rather than imports of the goods under investigation from abroad. Therefore, KADI's inference of causality in the Main Data Report, and this accusation of dumping, are irrelevant.

Answer:

In Section B.3 Calculation of Dumping Margin, B.4 Domestic Industrial Economic Performance and Section B.5 Causal Relationship, dumping originating from the Republic of Korea, Malaysia, and Taiwan is found. In addition, KADI also found material losses and causal relationships including volume impacts (absolute and relative) and price impacts (*price undercutting*, *price depression*, and *price suppression*). Therefore, it can be concluded that dumping originating from the Republic of Korea, Malaysia, and Taiwan is the cause of losses for IDN.

68. Proportionality and Termination

Considering the low margins, the absence of a causal relationship, and the significant negative impacts on downstream users, the imposition of import duties on Hansol would be contrary to Indonesia's legal framework and international obligations. The appropriate outcome would be to terminate the investigation into Hansol in accordance with Article 6 paragraph (2) and Article 25 of PP 34/2011, as well as Article 5.8 of the WTO Anti-Dumping Agreement.

Answer:

See responses to numbers 63, 65, 66 and 67.

B.7.2 Hanchang Paper Co., Ltd. (Exporter)

69. We note that KADI has expanded the scope of the investigation requested by the Applicant from "Single-Sided Coated Duplex Paperboard (grey background) from 210 to 450 grams" to only "Duplex Packaging Paper/Paperboard". This has resulted in a wider product scope and excessive protection of the domestic industry. This discrepancy clearly implies that KADI has changed the definition of the Goods Under Investigation and consequently expanded the product scope as shown below. Therefore, this Investigation must be stopped immediately due to the error in the scope of the products under investigation, so that the data submitted by the Applicant regarding the losses are also inaccurate, due to the difference in the scope of the products under investigation.

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Answer:

In Section B.1 Investigated goods and similar goods, KADI conducted an investigation into “multi-layered cardboard (from 210 to 450 grams/sqm) with a predominantly white top surface and a gray back surface” which falls under tariff headings Ex. 4810.32.90 and Ex. 4810.92.90. Therefore, the data submitted to KADI both in the application and questionnaire responses are only related to duplex board in accordance with the scope of the investigated goods.

70. Imports from Korea should be excluded from the calculation, because it is clear that imports from Korea do not compete with domestic products nor compete with imports from Malaysia and Taiwan.

Answer:

The duplex board produced by IDN is of a quality that has been accepted by the market. This is evidenced by the acceptance of IDN products in export markets, including Vietnam, Thailand, Mexico, Nigeria, and South Africa. Furthermore, the production process and machine technology used by IDN are the same as those used by exporters in countries accused of dumping.

71. Imports from Korea do not cause material losses to domestic industry, because there is no absolute or relative impact on consumption in the Indonesian market and there is no effect on price reductions.

Answer:

See response to number 67.

72. Hanchang Paper's export volume to Indonesia was relatively small during the investigation period and is expected to continue to be the smallest due to its relatively lower production capacity compared to other Korean producers.

Answer:

In Article 6 PP 34/2011 and Article 5.8 the negligible threshold for countries that can be accused in an antidumping investigation is 3%. based on BPS data, the share was 22%, so KADI conducted an investigation into the Republic of Korea.

73. There is a potential for trade conflict to arise, as Korean exporters primarily export pulp and paper products, not the Investigated Goods, produced by Indonesian producers. Therefore, if dumping is imposed unfairly, it will negatively impact the trade surplus of the Indonesian paper and pulp industry and national interests.

Answer:

See response number 66.

B.7.3 XSD International Paper Sdn. Bhd. (Exporter)

74. *FSC-capable and well-managed producers do not support the case. Only non-FSC or quality-challenged producers support it. This proves injury stems from competitive disadvantage, not dumped imports. Notably, 39% of the industry does not support the case establishment.*

Answer:

Although the Applicant's IDN does not produce FSC-certified duplex boards, there are still other IDNs that can produce FSC-certified duplex boards, such as PT Fajar Surya Wisesa Tbk, PT Dayasa Aria Prima, PT Mega Surya Eratama, and PT Suparma Tbk. In addition, there are also imported FSC-certified duplex boards originating from China, Hong Kong, Japan, and Finland.

FSC is one of the product quality criteria but is not a dumping criterion, so it cannot be considered in calculating dumping margins.

75. *Importing Companies Face Closure Indonesian companies importing FSC duplex board employing sales, logistics, quality control, and administrative staff.*

Cannot switch to domestic supply: PT Indah Kiat lacks FSC, PT Fajar has quality issues, other FSC insufficient producers capacity (19% only). The business model becomes unviable.

Answer:

It has been submitted at number 74.

76. *ASEAN Integration Contradicted (Source: KADI Report Table 5 (page 15))*

Indonesia-Malaysia agreements: ATIGA 0% tariff, RCEP 0% tariff Duties contradict strategic regional integration, invite retaliation, damage Indonesia's trade reputation, undermine ASEAN Economic Community.

Answer:

The tariff post of the Investigated Goods has MFN tariff and preferential tariff in international trade cooperation agreements, where this can relatively affect changes in WISCO's export trade pattern to Indonesia, which includes ACFTA, ATIGA, AHKFTA, and RCEP-China cooperation. Even though there are preferential tariffs, if the Investigated Goods are proven to be dumping, the application of BMAD can still be imposed considering that BMAD is an additional import duty from the import duty.

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general (*Most Favored Nation*) or preferential import duties based on international agreements.

B.7.4 Embassy of the Republic of Korea

77. *The scope of the subject product under investigation should be clearly limited to the range of items identified by the petitioner. The petitioner defined the scope of the subject product as "one side coated duplex board (grey back) from 210 to 450 grams. The petitioner limited the subject product to "grey back" products, but HS Codes 4810.32 and 4810.92 that currently form the basis of the industry injury index also cover "white back" products and "folding box board" products, resulting in an improper expansion of the scope of the subject product. In addition, as these HS Codes include all base weights (GSM), the investigation extends to products outside the range of 210 to 450 GSM identified by the petitioner as the scope of the subject product.*

Answer:

See response to number 69.

78. *The petitioner alleges that the domestic industry has suffered injury due to the cumulative effects of imports of the subject product from Korea and other exporting countries. However, imports from Korea should not be included in such a cumulative assessment with imports from other exporting countries. Pursuant to Article 3.3 of the WTO Anti-Dumping Agreement, a cumulative assessment is appropriate only when the conditions of competition warrant such an assessment. In this case, imports from Korea do not compete with imports from other exporting countries or with Indonesian domestic products. Products imported from Korea are high-quality products sold at prices significantly higher than those imported from other exporting countries or Indonesian domestic products. In fact, the differences in conditions of competition demonstrate that imports from Korea have not caused material damage to the domestic industry in Indonesia.*

Answer:

See response number 65.

79. *Korea is a major export market for Indonesia's pulp and paper products, with Indonesia recording an annual trade surplus of over USD 300 million. Korean exporters are major customers of Indonesian pulp and paper products, using these products as raw materials in the manufacture of goods for export. This anti-dumping investigation directly concerns these Korean exporters. As a result, imposing unnecessary anti-dumping duties on imports from Korea could negatively affect trade relations between the two countries and, in turn, have an adverse impact on the interests of the Indonesian pulp and paper industry.*

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Answer:

See response number 66.

80. *If anti-dumping duties are imposed, such measures could cause harm to downstream industries and consumers in Indonesia. Restricting imports of high-quality Korean duplex board would be subject to numerous Indonesian manufacturers of packaging materials, printed materials, and other products that use as a raw material to the double burden of higher costs and reduced quality. Ultimately, this burden may be passed on to Indonesian consumers*

Answer:

See response number 66.

B.7.5 PT Amerta Niagatama (Importer)

81. Duplex prices in the Indonesian market are determined by the market leader, and according to the data in the KADI main data report, the Applicant has the largest market share. Therefore, if the price is to be raised, it actually depends on the market leader. If the leader raises the price, others will follow.

Answer:

Based on the investigation, IDN has lowered its selling prices due to pressure from dumped imports from the Republic of Korea, Malaysia, and Taiwan. This was done to ensure IDN's survival amidst the onslaught of dumped imports. If IDN hadn't lowered its prices, it would certainly have been unable to compete with dumped imports.

82. For additional information, distributor selling prices this year have been higher than the prices of duplex products from Indonesian factories. This can also be seen in the KADI main data report. Therefore, another reason customers buy imported duplex products is not because of the lower price, but because there are needs that cannot be met by some local factories, such as FSC certification. Duplex factories in Indonesia that have FSC certification cannot yet meet all customer demand requiring FSC.

Feedback from our customers, in terms of quality, imported duplex paper such as Hansol from Korea and XSD from Malaysia also has a more stable quality than some local factories in Indonesia, which for some customers, is very important to be able to meet contract targets and production efficiency.

Answer:

See response to number 74.

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83. Healthy competition is needed to encourage domestic industry to continuously improve its quality and service. If domestic industry is pampered, it will harm customers and the economy as a whole, as it will fall further behind other countries. Import quotas are maintained by the Ministry of Forestry, thus maintaining competitiveness.

Answer:

The investigation conducted by KADI is a form of government protection to safeguard the domestic market from imported goods containing dumped materials. The anti-dumping policy aims to recoup losses caused by dumped goods (*unfair trade*) and restore competition to a level playing field. This policy does not prohibit imports, so domestic industries still have the option of sourcing raw materials from countries other than the one accused of dumping.

84. Imposing tariffs on imported duplex paper will increase the flow of imported semi-finished products into Indonesia, which is already happening and has impacted the business performance of several downstream industries. It is also necessary to protect downstream industries.

Answer:

See response to number 66.

B.7.6 PT Grafitecindo Ciptaprima and PT Printec Perkasa (Importers)

85. Product Quality and Export Specifications Are Not Substitutes for Each Other

Our US customers require tight technical tolerances and repeatable quality—for example, uniform thickness (*caliper*) and stiffness, surface smoothness/printability, and specific whiteness targets, along with zero-defect expectations and reliable lead times aligned with retail launch schedules. These are not typical paper requirements; rather, they are brand-critical specifications and are included in the vendor files approved by US retailers.

We understand that some paper mills in Indonesia operate comparable machinery. However, in practice, local mills have not demonstrated the ability to consistently maintain these specifications at the volumes we require. The fact that some domestic grades are accepted in other markets does not make them a substitute for our US program. If a product fails our buyers' quality assurance, it is not a suitable substitute, regardless of the nominal similarity.

As a downstream exporter, we bear the risk of direct penalties for any deviations (*chargebacks*, order cancellations, vendor downgrades).

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Forced substitution to unapproved local grades would result in immediate commercial loss of the program and irreversible reputational damage.

Answer:

See responses to numbers 66 and 74.

86. FSC Certification Is a De Facto Market Access Requirement

Our US customers require FSC-certified fiber for their paper-based packaging. Using uncertified paper violates our buyer's policy and risks *delisting*.

Major domestic suppliers do not supply FSC-certified *duplex board* in the grades we use. While some Indonesian factories can produce FSC-certified products, the volume availability, grade compliance, and delivered cost *currently* do not meet our export needs.

Alternative sources from countries other than Korea, Malaysia, and Taiwan that have FSC certification rarely provide the exact grades, volumes, and delivery times we require. In short, switching suppliers is difficult due to limited certification, tight supply, and higher costs, not because we're unwilling to change.

Answer:

See response to number 74.

87. Impact on the Downstream Sector and National Interests

Duplex *board* is a basic raw material for packaging across various export categories. Price increases due to import duties will have a ripple effect across the export supply chain, driving up FOB prices and eroding Indonesia's competitiveness compared to neighboring countries. This impact also comes on top of reciprocal tariff pressures in key markets, further squeezing margins and making Indonesian products less competitive abroad.

If a foreign buyer moves a program to another country, regaining it is nearly impossible. The loss of market position is permanent, not temporary.

The conversion sector is labor-intensive. A decline in orders will reduce factory utilization and have a knock-on effect on the Indonesian workforce and the local economy. These downstream impacts will outweigh the short-term benefits for a single upstream supplier and weaken Indonesia's established export supply chain.

Our People & Planet Commitment: As a group, we strongly believe in People & Planet. We are committed to providing employment opportunities for the community.

**FINAL REPORT ON THE RESULTS OF THE ANTI-DUMPING INVESTIGATION ON DUPLEX BOARD PRODUCTS
ORIGINATING FROM THE REPUBLIC OF KOREA, MALAYSIA, AND TAIWAN**

Indonesia and protect the environment by using only FSC-certified paper. To maintain this commitment, we must remain profitable and competitive in export markets. The proposed BMAD would raise input costs and limit access to approved FSC grades, directly undermining our ability to maintain Indonesian jobs and our environmental standards. In short, this policy would undermine our mission to support Indonesian workers while protecting the environment.

Answer:

See responses to numbers 66, 74 and 83.

88. Clarification of Several Items in the Main Data Report

We note the Key Data Report states:

- Domestic manufacturers use similar technology to exporters under investigation; and
- Some domestic producers or uninvestigated countries may supply FSC certified paper.

Our field experience shows that technological similarity does not guarantee output within the approval range required by our US customers. Yields are highly dependent on raw materials, process controls, quality assurance systems, and long-term consistency at scale. For our program, these conditions have not been met domestically for the grade in question.

Regarding FSC supply, the constraints are practical: the combination of certification, grade conformity, volume availability, reliable lead times, and pricing is not yet available domestically or from non-investigated countries in a way that allows us to maintain competitive export prices. This is why vetted suppliers remain essential to maintaining our current export orders.

Answer:

See responses to numbers 66, 74 and 83.

B.7.7 PT Catur Sukses Makmur

89. Based on the Main Data Report of the Anti-Dumping Investigation on Duplex Board imports originating from the Republic of Korea, Malaysia, and Taiwan, on page 11 it is stated that the calculation results of the Auditor or KADI Surveyor Team on the dumping margin of Duplex Board products sold by Hansol Paper Co., Ltd are 4.59% (ad valorem) or USO 0.027 per kg (specific), where when compared with the results of the dumping margin findings from other foreign paper factories, this value is the lowest.

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so it can be concluded that there is no intention at all from Hansol Paper Co., Ltd. to deliberately damage the market/selling price of Duplex Board products in Indonesia to harm local paper factories.

Answer:

See response to number 63.

90. Duplex Board products from Hansol Paper Co., Ltd are products that have been equipped with Forest Stewardship Council (FSC) certification where the license is valid globally and is intended as a guarantee that the raw materials of the product come from forests that are managed responsibly from an environmental, social, and economic perspective, so that buyers/end consumers can also trust that the product supports forest conservation and sustainable practices. Where many local printing or packaging companies that run businesses domestically or export prioritize this certification.

Answer:

See response number 66.

91. Hansol products also have a quality that has been recognized by several developed countries abroad (for example: Japan, the United States, etc.), where if forced to replace production raw materials in local printing or packaging companies that run businesses domestically or for export, it is feared that this will cause obstacles or problems, both material and non-material.

Answer:

See responses number 74 and 83.

B.8. CONCLUSION AND RECOMMENDATIONS

B.8.1 Conclusion

92. Based on the results of the investigation, KADI concluded the following:
- a. Based on numbers 32 to 37, dumping practices have occurred by several companies from the Republic of Korea, Malaysia, and Taiwan.
 - b. Based on numbers 39 to 47, several IDN performance indicators during the period of January 1 - December 31, 2022 (P1), January 1 - December 31, 2023 (P2), January 1 - December 31, 2024 (PP) experienced a decline, including domestic sales both in volume and value, operating profit, domestic selling price, market share, capacity utilization, production, productivity, ROI, and asset growth.

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- c. Based on number 59, there is a causal relationship between dumping and the losses experienced by IDN, which is stated as follows:
- i. the impact of volume both absolutely and relatively.
 - ii. the impact of prices in the form of *price undercutting* which is caused by dumping imports originating from Malaysia and Taiwan
 - iii. There is a price impact in the form of *price depression* where IDN is forced to lower its selling price due to pressure from import prices containing dumping originating from the Republic of Korea, Malaysia, and Taiwan.
 - iv. the impact of *price suppression* where IDN cannot increase its selling price following the increase in HPP due to the presence of imported goods with lower prices.

93. Based on the above matters, KADI concluded that dumping occurred which caused IDN to experience material losses and there was an increase in imports of dumped goods both absolutely and relatively and the occurrence of *price undercutting*, *price depression* and *price suppression*.

B.8.2 Recommendations

94. Based on the conclusions of the above investigation results, and considering the responses submitted by the interested parties, KADI recommends imposing BMAD on imports of “multi-layer cardboard paper (ranging from 210 to 450 grams/sqm) with a predominantly white top surface and a gray back surface” which is included in tariff items ex.4810.32.90 and ex.4810.92.90 originating from the Republic of Korea, Malaysia, and Taiwan with the following BMAD amounts:

Table 10. Recommended BMAD Amounts

Country	Manufacturer/Company	BMAD Amount	
		<i>Ad valorem (%)</i>	<i>Specific (USD/kg)</i>
Republic of Korea	Hansol Paper Co., Ltd.	4.04	0.024
	Hanchang Paper Co., Ltd.	26.52	0.14
	Other Companies XSD	26.52	0.14
Malaysia	International Paper Sdn. Bhd.	7.79	0.036
	Other Companies All	7.79	0.036
Taiwan	Companies in Taiwan	29.06	0.14

95. Anti-Dumping Import Duty is proposed to be valid for 5 (five) years from the date of enactment.

Jakarta, December 2025
Indonesian Anti-Dumping Committee

**LAPORAN AKHIR HASIL PENYELIDIKAN ANTI DUMPING
ATAS PRODUK KERTAS KARTON KEMASAN DUPEKS
YANG BERASAL DARI REPUBLIK KOREA, MALAYSIA,
DAN TAIWAN**

VERSI TIDAK RAHASIA

**KOMITE ANTI DUMPING INDONESIA
KEMENTERIAN PERDAGANGAN REPUBLIK INDONESIA
2025**

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A. PENDAHULUAN

A.1. LATAR BELAKANG

1. Penyelidikan dilakukan berdasarkan surat permohonan tertanggal 15 Maret 2024 yang diajukan oleh PT Indah Kiat Pulp & Paper Tbk, yang selanjutnya disebut sebagai Pemohon. Pemohon tersebut merupakan Industri Dalam Negeri (IDN) yang memproduksi *duplex board*. Produk tersebut termasuk dalam pos tarif ex 4810.32.90 dan ex 4810.92.90 (Buku Tarif Kepabeanan Indonesia - BTKI 2022). Adapun perihal permohonan adalah terkait dengan penyelidikan antidumping atas impor *duplex board* yang berasal dari Republik Korea, Malaysia, dan Taiwan. Permohonan secara lengkap dan benar diterima Komite Anti Dumping Indonesia (KADI) pada 31 Juli 2024 dan langsung dilakukan pemberitahuan kepada perwakilan negara yang dituduh. KADI memulai penyelidikan tersebut pada 10 September 2024.
2. Sesuai ketentuan Pasal 13 ayat (2) huruf b Peraturan Pemerintah Nomor 34 Tahun 2011 (PP 34/2011) dan *Article 6.9 Agreement on Implementation of Article VI of GATT 1994* yaitu *Anti Dumping Agreement* (ADA), KADI menerbitkan Laporan Data Utama (*Essential Facts*) hasil penyelidikan. Laporan ini akan menjadi dasar keputusan akhir hasil penyelidikan anti dumping atas impor produk *duplex board*.
3. Sesuai dengan ketentuan Pasal 10 ayat (1) PP 34/2011 dan *Article 12.2 ADA*, KADI menerbitkan laporan akhir hasil penyelidikan antidumping atas impor *duplex board*. Laporan ini akan menjadi dasar dalam rekomendasi KADI terkait Bea Masuk Anti Dumping (BMAD) terhadap impor produk *duplex board*.

A.2. PROSEDUR

4. Sesuai Pasal 7 ayat (1) PP 34/2011 dan *Article 5.5 ADA*, pada 31 Juli 2024 KADI melakukan pra-notifikasi kepada perwakilan pemerintah negara yang dituduh, yaitu melalui Kedutaan Besar Republik Korea, Malaysia, dan Taiwan di Indonesia. Pra-notifikasi ini merupakan pemberitahuan tentang diterimanya permohonan secara lengkap penyelidikan antidumping atas impor *duplex board* yang berasal dari ketiga negara tersebut.
5. KADI menetapkan bahwa permohonan IDN telah memenuhi persyaratan penyampaian bukti-bukti awal. Bukti awal tersebut adalah mengenai terjadinya dumping, kerugian yang dialami Pemohon, dan adanya hubungan kausal antara keduanya sehingga dapat dilakukan inisiasi penyelidikan.
6. KADI mengumumkan inisiasi penyelidikan antidumping atas produk *duplex board* yang berasal dari Republik Korea, Malaysia, dan Taiwan pada 10 September 2024 melalui Harian Bisnis Indonesia. Pengumuman tersebut juga disampaikan secara resmi kepada seluruh pihak yang berkepentingan dengan disertai pengiriman kuesioner kepada industri dalam negeri, eksportir dan/atau

eksportir produsen, dan importir yang diketahui dalam permohonan. KADI juga memberikan kesempatan untuk menyampaikan tanggapan tertulis dan mengajukan dengar pendapat (*hearing*) kepada pihak yang berkepentingan selambat-lambatnya 14 (empat belas) hari kerja sejak tanggal pengumuman yaitu tanggal 23 September 2024.

7. Pihak yang berkepentingan yang diketahui dalam permohonan dan yang mengembalikan kuesioner (kooperatif) adalah:
- a. Industri Dalam Negeri:
PT Indah Kiat Pulp & Paper Tbk (**kooperatif**).
 - b. Industri Dalam Negeri Pendukung:
PT Fajar Surya Wisesa Tbk. (**kooperatif**).
 - c. Eksportir/Eksportir Produsen
 - 1) Republik Korea
 - a) Hansol Paper (**kooperatif**, nama perusahaan: Hansol Paper Co., Ltd);
 - b) KleanNara Co., Ltd;
 - c) Seha Corp. (Hankuk Paper Mfg., Co., Ltd); dan
 - d) Hanchang Paper Co., Ltd. (**kooperatif**).
 - 2) Malaysia
XSD International Paper Sdn Bhd (**kooperatif**)
 - 3) Taiwan
 - a) Kuan Yuan Paper Mfg., Co., Ltd;
 - b) Yuen Foong Yu Paper Mfg., Co., Ltd; dan
 - c) Cheng Loong Corporation.
 - d. Importir
 - 1) Surya Terang;
 - 2) Amerta Niagatama (**kooperatif**, nama perusahaan: PT Amerta Niagatama);
 - 3) Setyamitra Kemas Lestari (**kooperatif**, nama perusahaan: PT Setyamitra Kemas Lestari Tbk);
 - 4) DNP Indonesia;
 - 5) Anugerah Jaya Maju Abadi Indobox (**kooperatif**, nama perusahaan: PT Anugerah Jaya Maju Abadi Indobox);
 - 6) Aneka Andalan Asia (**kooperatif**, nama perusahaan: PT Aneka Andalan Asia);
 - 7) Embossindo (**kooperatif**, nama perusahaan: PT Embossindo Utama);
 - 8) Solo Murni (**kooperatif**, nama perusahaan: PT Solo Murni);
 - 9) Cinjoe Jaya Perkasa Muda (**kooperatif**, nama perusahaan: PT Cinjoe Jaya Perkasa Muda);

- 10) Catur Sukses Makmur (**kooperatif**, nama perusahaan: PT Catur Sukses Makmur); dan
 - 11) Paper & Finishing Services.
8. Terdapat 4 (empat) tambahan Perusahaan yang menyampaikan jawaban kuesioner (**kooperatif**) di luar daftar perusahaan yang diketahui dalam permohonan, yaitu:
- a. Perusahaan di Republik Korea
Hansol PNS Co., Ltd., merupakan perusahaan penjualan (*trading company*) afiliasi Hansol Paper Co., Ltd untuk penjualan domestik.
 - b. Perusahaan di Malaysia
XSD Bentong Sdn., Bhd., merupakan perusahaan afiliasi XSD International Paper untuk penjualan ekspor.
 - c. Importir
 - 1) PT Printec Perkasa; dan
 - 2) PT Grafitecindo Ciptaprima.
9. Dari informasi tersebut di atas, terlihat bahwa tidak ada satupun eksportir dan/atau eksportir produsen di Taiwan yang menyampaikan jawaban kuesioner. Dengan demikian, untuk menentukan BMAD eksportir dan/atau produsen Taiwan, KADI akan menggunakan data terbaik yang dimiliki dalam penyelidikan (*best information available*).
10. Dari seluruh eksportir dan/atau eksportir produsen yang kooperatif, dalam penyelidikan ini KADI hanya dapat melakukan verifikasi lapangan terhadap Hansol Paper Co., Ltd., dan Hansol PNS Co., Ltd. Hal ini disebabkan oleh adanya keterbatasan sumberdaya.
11. KADI telah melakukan verifikasi lapangan ke:
- a. PT Indah Kiat Pulp & Paper Tbk selaku IDN pada 5 - 7 Februari 2025; dan
 - b. Hansol Paper Co., Ltd (eksportir produsen) dan Hansol PNS Co., Ltd (*trader* domestik) di Republik Korea Selatan pada 17 - 19 Juni 2025.
12. Sehubungan dengan banyaknya tanggapan yang disampaikan dalam penyelidikan, sesuai dengan Pasal 9 PP 34/2011 dan *Article* 5.10 ADA, pada 12 Agustus 2025 KADI memperpanjang jangka waktu penyelidikan menjadi paling lama 18 (delapan belas) bulan.
13. Pada 12 Agustus 2025 KADI telah menerbitkan Laporan Data Utama, yang disampaikan kepada seluruh pihak yang berkepentingan yang kooperatif dalam penyelidikan. Dokumen perhitungan margin dumping yang bersifat rahasia disampaikan ke masing-masing eksportir dan produsen terkait sebagai lampiran. KADI memberikan kesempatan kepada pihak yang berkepentingan yang kooperatif dalam penyelidikan untuk menyampaikan tanggapan atas

laporan sampai 20 Agustus 2025. KADI juga memberikan kesempatan kepada para pihak untuk mengajukan dengar pendapat (*hearing*) sampai dengan tanggal 27 Agustus 2025.

14. Sesuai Pasal 13 ayat (1) PP 34/2011 dan *Article* 6.2 ADA, KADI telah melakukan dengar pendapat publik (*public hearing*) pada 24 September 2025. KADI juga melakukan dengar pendapat khusus (*specific hearing*) yang bersifat rahasia pada 23 dan 24 September 2025 terhadap perusahaan yang mengajukan permintaan.
15. Periode penyelidikan *duplex board* adalah:
 - a. Periode kerugian: Januari - Desember 2021 (P1), Januari - Desember 2022 (P2), Januari - Desember 2023 (PP); dan
 - b. Periode Penyelidikan (PP) dumping: Januari - Desember 2023.

A.3. PENENTUAN MARGIN DUMPING

16. Dalam melakukan perhitungan margin dumping, KADI menggunakan data jawaban kuesioner dari produsen atau eksportir produsen dari negara yang dituduh dumping. Margin dumping *ad valorem* dihitung dengan cara mengurangi nilai normal dengan harga ekspor eks pabrik, setelah itu dibagi dengan harga CIF untuk mendapatkan angka persentase. Sedangkan margin dumping spesifik ditetapkan berdasarkan selisih antara nilai normal dengan harga ekspor (eks pabrik). Dengan demikian nilai normal dan harga ekspor berada pada tingkat perdagangan yang sama (*fair comparison*).
17. Harga Pokok Penjualan (HPP)

Dalam hal produsen atau eksportir produsen memproduksi lebih dari satu jenis barang, data biaya untuk Barang Yang Diselidiki harus ditentukan sesuai dengan alokasi beban biaya masing-masing jenis barang. Jika pengalokasian biaya dinilai tidak mencerminkan biaya yang sebenarnya, KADI melakukan penyesuaian yang dianggap wajar. Penyesuaian tersebut disampaikan kepada produsen atau eksportir produsen yang bersangkutan.
18. 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.

A.3.1. Nilai Normal

19. Data transaksi penjualan domestik dapat digunakan untuk menghitung nilai normal jika memenuhi persyaratan perdagangan yang wajar (*ordinary course of trade*).

20. Uji Kecukupan

Dalam perhitungan nilai normal, data penjualan produsen atau eksportir produsen dapat digunakan apabila total volume penjualan domestik $\geq 5\%$ dari total volume penjualan ekspor ke Indonesia.

21. Uji Profitabilitas

Jika volume penjualan yang menguntungkan $< 20\%$ maka transaksi tersebut diabaikan dan digunakan metode konstruksi. Apabila volume penjualan yang menguntungkan $20\%-80\%$, maka hanya transaksi yang menguntungkan yang digunakan dalam perhitungan nilai normal. Sedangkan apabila volume penjualan yang menguntungkan $>80\%$, seluruh transaksi penjualan digunakan dalam perhitungan nilai normal.

22. Nilai normal masing-masing produsen dan/atau eksportir produsen, secara umum ditentukan berdasarkan rata-rata tertimbang dari transaksi penjualan domestik selama periode penyelidikan. Nilai normal adalah harga jual domestik pada tingkat eks pabrik.

23. Perhitungan harga domestik eks pabrik dilakukan dengan mengurangi harga jual domestik dengan *allowances*. *Allowances* yang dapat digunakan dalam perhitungan adalah yang terkait dengan biaya penjualan langsung di luar pabrik, dan dapat ditelusuri dari data perusahaan yang terkait dengan penjualan barang yang diselidiki.

24. Kode Kontrol Barang (KKB) adalah suatu sistem pengkodean barang berupa kombinasi huruf, angka, dan/atau simbol yang dirancang untuk memberikan identitas khusus pada setiap barang KKB dibuat dengan tujuan untuk identifikasi dan komparasi antara Barang Sejenis dan Barang Yang Diselidiki. Jika ekspor untuk KKB tertentu tidak dijual di pasar domestik, maka nilai normal dihitung dengan cara konstruksi (*constructed normal value*). Perhitungan ini didasarkan pada biaya produksi, biaya penjualan, biaya umum, dan biaya administrasi domestik, serta keuntungan yang wajar untuk KKB dimaksud.

A.3.2. Harga Ekspor

25. Harga ekspor adalah harga jual Barang Yang Diselidiki di daerah pabean Indonesia. Sedangkan harga ekspor eks pabrik ditentukan berdasarkan rata-rata tertimbang dari seluruh transaksi penjualan ekspor ke Indonesia selama Periode Penyelidikan yang telah dikurangi dengan *allowances* yang dapat diterima.

B. PENYELIDIKAN

B.1. BARANG YANG DISELIDIKI DAN BARANG SEJENIS

26. Pada 16 Juli 2025, 29 Oktober 2025 dan 11 November 2025, KADI melakukan koordinasi dengan Direktorat Jenderal Bea Cukai, Badan Kebijakan

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YANG BERASAL DARI REPUBLIK KOREA, MALAYSIA, DAN TAIWAN**

Perdagangan, Kementerian Perindustrian, Balai Besar Standardisasi dan Pelayanan Jasa Industri Selulosa dan Pemohon. Untuk kemudahan implementasi di lapangan terkait dengan pemungutan BMAD, uraian barang yang diselidiki adalah **“kertas karton (mulai dari 210 hingga 450 gram/sqm) multilapis dengan permukaan atas dominan warna putih, dan permukaan belakang berwarna abu-abu”** yang berasal dari Republik Korea, Malaysia, dan Taiwan, yang termasuk dalam pos tarif ex. 4810.32.90 dan ex. 4810.92.90.

27. Produk *duplex board* yang diproduksi oleh Pemohon merupakan Barang Sejenis dengan Barang Yang Diselidiki yang diimpor dari Republik Korea, Malaysia dan Taiwan, baik itu dalam hal karakteristik maupun penggunaan. Berdasarkan BTKI 2022, Barang yang Diselidiki masuk dalam pos tarif sebagaimana dapat dilihat dalam Tabel 1.

Tabel 1. Uraian Barang yang Diselidiki

Nomor HS	Uraian Barang
48.10	Kertas dan kertas karton, dilapisi satu atau kedua sisinya dengan kaolin (tanah liat Cina) atau zat anorganik lainnya, dengan atau tanpa bahan pengikat, dan tanpa pelapis lainnya, diwarnai, dihias atau dicetak permukaannya maupun tidak, dalam gulungan atau lembaran empat persegi panjang (termasuk bujur sangkar) dari berbagai ukuran.
4810.32	- - Dikelantang seluruhnya secara seragam, dan mengandung serat kayu yang diperoleh dengan proses kimia lebih dari 95% menurut berat keseluruhan kandungan seratnya, dan beratnya lebih dari 150 g/m ² :
ex.4810.32.90	- - - Lain-lain
4810.92	- - Multi lapis:
ex.4810.92.90	- - - Lain-lain

Sumber: BTKI 2022.

28. Kegunaan *duplex board* adalah terutama untuk kemasan karton/kotak (*folding cartons*) berbagai kebutuhan konsumen dan produk industrial seperti farmasi, perlengkapan mandi, makanan, minuman bubuk, peralatan listrik, sepatu, garmen, dan lain-lain.

B.2. INDUSTRI DALAM NEGERI

B.2.1. Volume Produksi Industri Dalam Negeri

Tabel 2. Presentase Produksi *Duplex Board* Indonesia pada PP

No.	Nama Perusahaan	%
1.	Pemohon (IDN)	36
	PT Indah Kiat Pulp & Paper Tbk	36
2.	Idn Pendukung	25
	PT Fajar Surya Wisesa Tbk + PT Dayasa Aria Prima (1 Grup)	25
	Pemohon + Pendukung	61
3.	Industri dalam negeri (idn) barang sejenis yang tidak mendukung atau yang tidak menolak	39
	PT Gaya Baru Paperindo	2
	PT Mega Surya Eratama	9
	PT Pakerin	10
	PT Papyrus Sakti	8
	PT Suparma Tbk	10
	Total Produksi Nasional	100

Sumber: IDN, diolah

29. Berdasarkan Tabel 2 di atas, total produksi Pemohon sebesar 36% dari total produksi nasional. Dalam penyelidikan ini, Pemohon mendapat dukungan dari idn lainnya yang memiliki presentase produksi sebesar 25% dari produksi nasional. Dengan demikian, Pemohon sudah memenuhi persyaratan untuk mewakili IDN yang tertuang dalam Pasal 4 ayat (3) dan Pasal 6 ayat (1) huruf a dari PP 34/2011 dan *Article 5.4* ADA. Sebagai tambahan informasi, permohonan penyelidikan ini mendapatkan dukungan dari Asosiasi Pulp dan Kertas Indonesia (APKI).

B.2.2. Proses Produksi

30. Berikut ini adalah proses produksi *duplex board*:

a. Pembentukan (Bagian Kawat)

Pembentukan adalah langkah penting dalam proses pembuatan *duplex board* yang melibatkan transformasi bubur kertas menjadi lembaran kertas lanjutan pada mesin kertas. Pada tahap pembentukan, bubur kertas dipompa ke saringan atau kawat jaring yang bergerak. Saat bubur kertas bergerak di sepanjang saringan, air akan terkuras. Pada tahap ini, serat mulai terikat satu sama lain untuk membentuk jaringan kertas basah. Konsistensi dan kecepatan aliran bubur kertas dikontrol untuk memastikan agar lembaran kertas memiliki karakteristik yang diinginkan dari segi kekuatan, kehalusan, dan ketebalan.

b. Pengepresan

Tahap pengepresan termasuk proses menghilangkan air pada jaringan kertas basah melalui tiga set *rollers* atau pengepres. Proses ini bertujuan untuk memeras air dan meratakan kertas. Proses ini membantu meningkatkan kepadatan, kekuatan, dan kehalusan kertas serta menghilangkan kelebihan air (yang dapat mencapai 50% dari berat kertas) dan mengkonsolidasikan serat kertas. Tahap pengepresan mengikuti tahap pembentukan dan tahap pengeringan awal pada mesin kertas. Saat jaringan kertas dijepit di antara *rollers*, serat akan menjadi rata dan padat, sehingga menghasilkan produk kertas yang lebih padat dan kuat.

c. Pengeringan

Pengeringan merupakan proses penting dalam pembuatan *duplex board* setelah bubur kertas dibentuk menjadi lembaran kertas dan ditekan untuk menghilangkan kelebihan air. Tahap pengeringan meliputi proses dimana jaringan kertas masuk ke dalam serangkaian silinder yang dipanaskan atau metode pengeringan lainnya guna menghilangkan sisa air dan menjadikan kertas sesuai dengan kadar kelembaban akhir. Bagian pengeringan mesin kertas terdiri dari pengering utama 6 set/ grup. Pengering ini dipanaskan dan disusun dalam urutan tertentu untuk mengurangi kadar air pada jaringan kertas secara bertahap. Saat kertas melewati bagian pengeringan, suhu meningkat dan tingkat kelembapan menurun, sehingga sisa air menguap.

d. Pengukuran Permukaan

Pada Mesin Kertas, alat pres ukuran digunakan untuk melapisi permukaan kertas dengan larutan kanji atau bahan lain. Setelah itu kertas dikeringkan. Selain itu, pada tahap ini tingkat debu akan berkurang, kekakuan meningkat, dan permeabilitas udara berkurang.

e. Pelapisan

Dalam proses pelapisan ini, permukaan kertas dilapisi material untuk meningkatkan sifat-sifatnya termasuk tingkat kecerahan, opasitas, kehalusan, dan kemampuan cetak. Pelapisan ini dapat diterapkan pada satu atau kedua sisi kertas dan dapat berbasis air atau berbasis pelarut. Proses pelapisan ini dilakukan setelah kertas selesai diproduksi dan sebelum digulung menjadi produk jadi, dengan menggunakan metode pelapisan pisau. Setelah pelapis diaplikasikan, kertas dikeringkan dengan melewati pengering udara infra merah dan tudung pengering.

f. Calendering

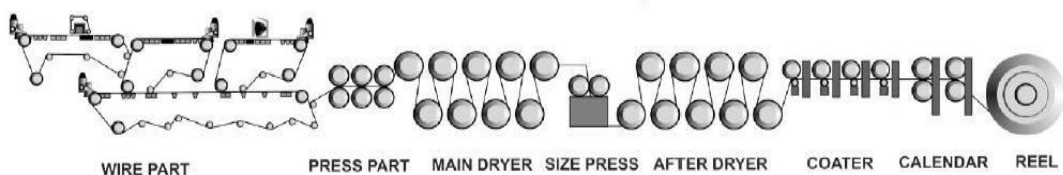
Calendering adalah tahapan selanjutnya dalam proses pembuatan kertas yang digunakan untuk meningkatkan sifat permukaan kertas, dari segi kehalusan, kilap, dan kemampuan cetak. Pada proses *calendering* ini,

lembaran kertas akan melewati serangkaian *rollers* yang dipanaskan di bawah tekanan tinggi. Proses *calendering* dapat dibagi menjadi dua jenis:

- 1) *Soft calendering*: Proses ini menggunakan serangkaian *rollers* yang dipanaskan dengan tekanan relatif rendah. Proses ditujukan untuk meningkatkan sifat permukaan kertas yang dilapisi.
- 2) *Hard calendering*: Proses ini menggunakan serangkaian *rollers* yang dipanaskan dengan tekanan tinggi, dapat mencapai 1000 pon per inci linier (PLI). Proses digunakan untuk memperbaiki sifat permukaan, memperbaiki ukuran besar dan kekakuan kertas, serta membuatnya lebih tahan terhadap sobek dan kerutan.

g. Penggulungan

Proses penggulungan merupakan proses terakhir dimana tahap ini bertujuan untuk memudahkan penyimpanan kertas. Proses dilakukan menggunakan mesin kertas dengan kecepatan tinggi.



Gambar 1. Proses Produksi Duplex Board

B.3. PERHITUNGAN MARGIN DUMPING

31. KADI melakukan perhitungan margin dumping untuk masing-masing perusahaan yang kooperatif dalam penyelidikan. Perhitungan secara detail disampaikan secara terpisah kepada masing-masing produsen atau eksportir produsen sebagai lampiran dari laporan data utama ini.

Republik Korea

32. Hansol Paper Co., Ltd. (selanjutnya disebut Hansol)

Hansol merupakan eksportir produsen *duplex board* di Republik Korea yang menjual produknya di pasar domestik dan ekspor. Hansol memiliki afiliasi dengan Hansol PNS Co., Ltd. Perusahaan afiliasi ini hanya menjual *duplex board* di pasar domestik.

Dalam penyelidikan ini, Hansol mengajukan permintaan dengar pendapat khusus (*specific hearing*) pada 24 September 2025. Pertemuan membahas perhitungan margin dumping, dimana KADI belum memperhitungkan sewa Gudang pada penjualan domestik. Pengeluaran ini diklaim perusahaan sebagai *allowance* dalam perhitungan nilai normal.

Harga Ekspor

Harga ekspor untuk perusahaan ini dihitung dari 4 KKB *duplex board* yang diekspor ke Indonesia.

Nilai Normal

Berdasarkan hasil uji kecukupan, seluruh transaksi domestik dapat digunakan dalam perhitungan nilai normal. Nilai normal untuk perusahaan ini dihitung berdasarkan 4 KKB *duplex board* yang diekspor ke Indonesia dan identik dengan 4 KKB yang dijual di pasar domestik. Berdasarkan hasil uji profitabilitas, seluruh transaksi untuk 4 KKB tersebut dapat digunakan untuk perhitungan nilai normal.

Dalam perhitungan nilai normal ini, KADI telah melakukan pengecekan bukti dan informasi yang disampaikan oleh perusahaan dalam dengar pendapat khusus. Hal ini telah terkonfirmasi dalam data verifikasi dan juga laporan keuangan perusahaan, sehingga KADI melakukan penyesuaian perhitungan nilai normal berdasarkan bukti yang disampaikan.

Margin Dumping

Setelah dilakukannya penyesuaian perhitungan nilai normal sesuai bukti dan informasi yang diberikan oleh perusahaan dan dapat diterima maka perhitungan margin dumping untuk Hansol menjadi sebesar 4,04% (*ad valorem*) atau USD 0,024 per kg (spesifik).

33. Hanchang Paper Co., Ltd. (selanjutnya disebut Hanchang)

Hanchang merupakan eksportir produsen *duplex board* di Republik Korea yang menjual produknya di pasar domestik dan ekspor.

Harga Ekspor

Pada 23 September 2025, Hanchang mengajukan dengar pendapat khusus terkait perhitungan margin dumping. Dalam hal ini, terdapat perbedaan penggunaan data dalam perhitungan harga ekspor penjualan ke Indonesia. KADI menggunakan *term* CIF, sementara Hanchang menjual produk ke Indonesia menggunakan *term* FAS (*free alongside ship*).

Harga ekspor untuk perusahaan ini dihitung dari 4 KKB *duplex board* yang diekspor ke Indonesia, dan telah disesuaikan dengan fakta yang disampaikan perusahaan. Sehingga dalam menghitung harga ekspor eks-pabrik KADI menggunakan *term* FAS.

Nilai Normal

Berdasarkan hasil uji kecukupan yang telah disesuaikan dengan hasil dengar pendapat khusus, seluruh transaksi domestik dapat digunakan dalam perhitungan nilai normal. Nilai normal untuk perusahaan ini dihitung berdasarkan 4 KKB *duplex board* yang diekspor ke Indonesia dan identik

dengan 4 KKB yang dijual di pasar domestik. Berdasarkan hasil uji profitabilitas, dari 4 KKB yang identik diekspor ke Indonesia terdapat 3 KKB yang dijual rugi dan perhitungan nilai normal dilakukan dengan metode konstruksi, sedangkan 1 KKB dengan jumlah transaksi yang menguntungkan di atas 20%.

Dalam dengar pendapat khusus pada 23 September 2025, KADI menanyakan terkait biaya input *raw material* terhadap struktur biaya pembuatan *duplex board*. Hanchang memberikan pernyataan yang berbeda dengan data yang disampaikan dalam jawaban kuesioner. Hanchang meminta waktu tambahan untuk menjawab semua pertanyaan yang diajukan oleh KADI, sehingga pada 24 September 2025 Hanchang diberikan kesempatan tambahan untuk menyampaikan jawaban dan klarifikasi atas data yang disampaikan pada jawaban kuesioner. KADI dapat menerima tanggapan yang disampaikan Hanchang terkait term FAS-. Namun demikian, KADI tidak dapat menerima metode alokasi yang digunakan perusahaan karena terdapat ketidakcocokan terhadap data yang disampaikan. Disamping itu terdapat ketidakwajaran terhadap metode alokasi dan proporsi struktur biaya yang digunakan oleh Hanchang. Oleh karena itu, terhadap perhitungan struktur biaya Hanchang, KADI melakukan perhitungan alokasi dan konstruksi dengan menggunakan data keuangan perusahaan.

Margin Dumping

Berdasarkan hasil perhitungan, margin dumping untuk Hanchang adalah sebesar 26,52% (*ad valorem*) atau USD 0,14 per kg (spesifik).

34. Margin dumping untuk perusahaan selain dari perusahaan yang telah disebutkan di atas akan dikenakan margin dumping tertinggi dari perusahaan yang kooperatif, yaitu sebesar 26,52% (*ad valorem*) atau USD 0,14 per kg (spesifik)

Malaysia

35. XSD Internasional Paper Sdn. Bhd. (selanjutnya disebut XSD)

XSD merupakan eksportir produsen *duplex board* di Malaysia yang menjual produknya dipasar domestik, sedangkan untuk ekspor XSD menjual melalui perusahaan penjualan (*trader*) afiliasinya yaitu XSD Bentong Sdn. Bhd. Produk tersebut kemudian dijual ke Hong Kong Paper Sources Co., Limited (*trader* tidak terafiliasi) dan selanjutnya di ekspor ke Indonesia. Selain itu XSD juga melakukan ekspor ke Indonesia melalui Hong Kong Paper Sources Co., Limited. Dalam penyelidikan ini Hong Kong Paper Sources Co., Limited tidak menyampaikan jawaban kuesioner.

Harga Ekspor

Harga ekspor untuk perusahaan ini dihitung dari 43 KKB *duplex board* yang diekspor ke Indonesia.

Nilai Normal

Berdasarkan hasil uji kecukupan, seluruh transaksi domestik dapat digunakan dalam perhitungan nilai normal. Nilai normal untuk perusahaan ini dihitung berdasarkan 43 KKB *duplex board* yang diekspor ke Indonesia. Dari 43 KKB tersebut, 34 KKB identik dengan yang dijual di pasar domestik dan terdapat 9 KKB yang tidak dijual di pasar domestik. Berdasarkan hasil uji profitabilitas, transaksi untuk 28 KKB dapat digunakan untuk perhitungan nilai normal, 1 KKB hanya transaksi yang menguntungkan, sedangkan 14 KKB dilakukan konstruksi.

Margin Dumping

Berdasarkan hasil perhitungan, margin dumping untuk XSD sebesar 7,79% (*ad valorem*) atau USD 0,036 per kg (spesifik).

36. Margin dumping untuk perusahaan selain dari perusahaan yang telah disebutkan di atas akan dikenakan margin dumping tertinggi dari perusahaan yang kooperatif, yaitu sebesar 7,79% (*ad valorem*) atau USD 0,036 per kg (spesifik).

Taiwan

37. Tidak ada perusahaan yang kooperatif di dalam penyelidikan, sehingga seluruh perusahaan asal Taiwan akan dikenakan besaran margin dumping berdasarkan data yang dimiliki oleh KADI, yaitu sebesar 29,06% (*ad valorem*) atau USD 0,14 per kg (spesifik).

B.4. KINERJA EKONOMI INDUSTRI DALAM NEGERI

38. Dalam melakukan analisa kerugian, KADI menggunakan data 3 tahun terakhir yaitu 1 Januari 2021 sampai dengan 31 Desember 2023 yang merupakan tahun penyelidikan.

Tabel 3. Indikator Kinerja Ekonomi IDN berdasarkan Indeks Poin P1

No	Indikator	Satuan	P1	P2	PP	Tren
			Indeks Poin			%
1.	Penjualan domestik	MT	100	88	91	(4,45)
2.	Penjualan domestik	USD 000	100	95	64	(19,95)
3.	Laba Operasional	USD 000	100	89	21	(54,66)
4.	Harga jual domestik	USD/MT	100	108	70	(16,25)
5.	Harga Pokok Penjualan (HPP)	USD/MT	100	136	131	14,46
6.	Pangsa Pasar	%	100	83	85	(7,99)
7.	Kapasitas terpasang	MT	100	100	100	1,65
8.	Utilisasi Kapasitas	%	100	87	86	(7,22)
9.	Produksi	MT	100	87	89	(5,69)
10.	Persediaan	MT	100	152	58	(23,92)
11.	Tenaga Kerja	Org	100	102	100	0
12.	Upah	USD	100	102	104	1,78
13.	Produktivitas	MT/Org	100	85	90	(4,94)
14.	Kemampuan meningkatkan modal*	%	100	81	78	(11,67)
15.	Cash Flow*	USD 000	100	60	127	12,75
16.	ROI*	%	100	130	86	(7,35)
17.	Pertumbuhan aset*	%	100	78	(74)	n/a

Sumber: IDN, diolah.

Keterangan: *ROI*, *cashflow*, pertumbuhan aset, dan kemampuan meningkatkan modal merupakan nilai dari seluruh produk.

39. Selama periode penyelidikan, penjualan domestik IDN mengalami penurunan baik secara volume dan nilai dengan tren masing-masing sebesar 4,45%, dan 19,95%. Pada saat yang bersamaan laba operasional dan harga jual domestik juga mengalami penurunan dengan tren masing-masing sebesar 54,66% dan 16,25%. Sementara HPP dari IDN mengalami peningkatan dengan tren sebesar 14,46%.
40. Penjualan domestik IDN yang mengalami penurunan menyebabkan pangsa pasar IDN juga mengalami penurunan dengan tren sebesar 7,99%.
41. Tabel 3 juga menggambarkan bahwa selama periode penyelidikan, kapasitas terpasang mengalami peningkatan dengan tren sebesar 1,65% karena kerusakan mesin pada tahun 2023 mengharuskan perusahaan mengganti (meng-*upgrade*) suku cadang mesin. Hal ini diperlukan untuk meningkatkan kecepatan produksi tahunan. Namun jumlah produksi justru mengalami penurunan dengan tren sebesar 5,69%. Peningkatan kapasitas dan penurunan

produksi tersebut menyebabkan utilisasi kapasitas mengalami penurunan dengan tren sebesar 7,22%.

42. Penurunan utilisasi kapasitas produksi (7,22%), penurunan jumlah produksi (5,69%), serta penurunan volume penjualan domestik (4,45%), tersebut juga menyebabkan penurunan pada persediaan IDN dengan tren sebesar 23,92%
43. Namun demikian, meskipun Produksi IDN mengalami penurunan, jumlah tenaga kerjanya tidak mengalami perubahan, sehingga produktivitasnya menurun dengan tren sebesar 4,94%. Pada saat yang sama, IDN tetap harus meningkatkan upah tenaga kerjanya, sesuai dengan Upah Minimum Provinsi (UMP) yang ditetapkan oleh pemerintah daerah setempat.
44. Berdasarkan data dan uraian tersebut di atas, dapat disimpulkan bahwa IDN mengalami kerugian mengingat produktivitas, penjualan domestik, produksi yang turun dan UMP yang naik.
45. Pada tabel di atas, terlihat bahwa kinerja IDN secara keseluruhan menunjukan bahwa kemampuan perusahaan dalam meningkatkan modal dan *Return On Investment* (ROI) mengalami penurunan dengan tren masing-masing sebesar 11,67% dan 7,35%. Untuk indikator pertumbuhan asset yang pada P1 100 indeks poin, bahkan sudah negatif (74) indeks poin pada saat PP.
46. Namun demikian, Tabel yang sama juga memperlihatkan bahwa data *cash flow* perusahaan mengalami peningkatan dengan tren sebesar 12,75%. Berbeda dengan data yang telah dianalisa di atas yang merupakan data untuk barang yang diduga terdampak dumping, ROI, *cashflow*, pertumbuhan asset, dan kemampuan meningkatkan modal merupakan data dari seluruh barang yang diproduksi oleh Pemohon/ IDN.
47. Berdasarkan analisa indikator kinerja ekonomi, dapat disimpulkan bahwa IDN mengalami kerugian materiel yang ditunjukan dengan menurunnya penjualan domestik baik secara volume dan nilai, laba operasional, harga jual domestik, pangsa pasar, utilisasi kapasitas, produksi, produktifitas, ROI, dan pertumbuhan asset.

B.5. HUBUNGAN SEBAB AKIBAT

B.5.1 Dampak Volume

B.5.1.1 Dampak Volume Secara Absolut

48. Berbeda dengan kondisi penjualan domestik IDN yang terus menurun (4,45%), impor *duplex board* Indonesia justru mengalami peningkatan, seperti yang terlihat pada tabel 4 dengan tren 50,70%. Bahkan total impor *duplex board* yang berasal dari negara yang dituduh dumping mengalami peningkatan dengan tren yang lebih besar (54,27%). Hal ini menggambarkan bahwa pasar domestik Indonesia semakin dikuasai oleh barang impor.

Tabel 4. Perkembangan Volume Impor *Duplex Board* Indonesia (P1-PP)

Negara	Satuan	P1	P2	PP	Tren (%)
Negara dituduh Dumping	MT	21.784	46.744	51.844	54,27
Republik Korea	MT	21.436	39.657	27.386	13,03
Malaysia	MT	0	1.501	16.881	n/a
Taiwan	MT	348	5.586	7.577	366,62
Negara Lainnya	MT	33.213	54.501	73.057	48,31
Total Impor	MT	54.997	101.245	124.901	50,70

Sumber: Badan Pusat Statistik, diolah.

B.5.1.2 Dampak Volume Secara Relatif Terhadap Konsumsi Nasional

49. Sesuai Peraturan Menteri Keuangan (PMK) Nomor 26/PMK.010/2022 tentang Penetapan Sistem Klasifikasi Barang dan Pembebasan Tarif Bea Masuk atas Barang Impor, tarif bea masuk MFN untuk *duplex board* sebesar 5%. Sedangkan tarif preferensi untuk *duplex board* dapat dilihat pada Tabel 5.

Tabel 5. Tarif Preferensi *Duplex Board* di Indonesia

No.	Negara	Perjanjian Internasional	PMK tentang Penetapan Tarif	Tarif (%)
1.	Republik Korea	RCEP – Korea	223/PMK.010/2022	0
		IKCEPA	227/PMK.010/2022	0
2.	Malaysia	ASEAN – RCEP	221/PMK.010/2022	0
		ATIGA	43/PMK.010/2022	0

Sumber: INSW

50. Indonesia belum memiliki perjanjian internasional dengan Taiwan. Oleh karena itu untuk *duplex board* impor asal Taiwan dikenakan tarif MFN sesuai dengan PMK Nomor 26/PMK.010/2022 tentang Penetapan Sistem Klasifikasi Barang dan Pembebasan Tarif Bea Masuk atas Barang Impor
51. Meskipun terdapat tarif preferensi, dalam hal ini RCEP, ATIGA, dan IKCEPA, namun apabila terbukti terdapat BMAD maka BMAD tetap dapat dikenakan. Hal ini mengingat bahwa BMAD merupakan bea masuk tambahan dari bea masuk umum (*Most Favoured Nation*) atau bea masuk preferensi berdasarkan perjanjian internasional.
52. Tabel 6 menunjukkan bahwa perkembangan total penjualan domestik *duplex board* Indonesia yang diperoleh dari total volume penjualan domestik (IDN dan idn lainnya) mengalami penurunan, meskipun tidak signifikan (trend 6,66%). Padahal, selama periode penyelidikan (3 tahun), konsumsi nasional *duplex board* meningkat dari 100 indeks poin pada P1 menjadi 108 indeks poin pada PP (tren 3,85%). Di saat yang sama, impor dari negara dituduh dumping justru mengalami peningkatan yang sangat signifikan dengan tren sebesar 48,60%. Namun sebaliknya, volume penjualan produk dalam negeri (IDN dan idn

**LAPORAN AKHIR HASIL PENYELIDIKAN ANTI DUMPING ATAS PRODUK DUPLEX BOARD
YANG BERASAL DARI REPUBLIK KOREA, MALAYSIA, DAN TAIWAN**

lainnya) mengalami penurunan dengan tren masing-masing sebesar 7,99% dan 5,78%.

Tabel 6. Perkembangan Pangsa Pasar Konsumsi Nasional *Duplex Board* Indonesia berdasarkan Indeks Poin P1

Negara	P1	P2	PP	Tren
	Indeks			%
Negara dituduh Dumping	100	202	221	48,60
Republik Korea	100	174	118	8,82
Malaysia ¹	0	100	1.100	1.000,00 ²
Taiwan	100	1.429	1.900	335,89
Negara Lainnya	100	155	204	42,87
Total Impor	100	173	211	45,10
Penjualan IDN	100	83	85	(7,99)
Penjualan idn Lainnya	100	97	89	(5,78)
Total Penjualan domestik	100	91	87	(6,66)
Konsumsi Nasional ³	100	106	108	3,85

Sumber: BPS; Jawaban Kuesioner IDN. Diolah.

Keterangan:

- 1) nilai P1 Malaysia 0, sehingga menggunakan indeks poin pada P2
- 2) persentase pertumbuhan pangsa pasar *duplex board* impor dari Malaysia (P2 ke PP).
- 3) merupakan penjumlahan total penjualan domestik dengan data total impor

B.5.2 Dampak Harga

Tabel 7. Perkembangan Harga *Duplex Board* di Indonesia berdasarkan Indeks Poin P1

No.	Harga	P1	P2	PP	Tren
		Indeks Poin			(%)
1.	IDN	100	108	70	(16,25)
2.	Republik Korea*	100	110	84	(8,30)
3.	Malaysia*	-	100	75	(24,55)**
4.	Taiwan***	100	139	85	(7,78)

Sumber : BPS dan IDN, diolah.

*) Harga impor + Bea Masuk (Tarif Preferensi) + THC

**) merupakan pertumbuhan harga dari P2 ke PP

***) Harga impor + Bea Masuk (MFN) + THC

53. Tabel 7 di atas menjelaskan bahwa harga jual *duplex board* IDN mengalami penurunan yang signifikan (tren 16,25%), dari 100 indeks poin pada P1 menjadi hanya 70 indeks poin pada PP. Dalam periode yang sama, harga impor *duplex board* yang berasal dari Republik Korea dan Taiwan mengalami penurunan dengan tren masing-masing sebesar 8,30% dan 7,78%. Sementara harga impor *duplex board* yang berasal dari Malaysia mengalami penurunan dari 100 poin indeks pada P2 menjadi 75 poin indeks pada PP.

Tabel 8. Dampak Harga *Duplex Board* di Indonesia berdasarkan Indeks Poin P1 IDN

No.	Harga	P1	P2	PP	Tren
		Indeks Poin			%
1.	IDN	100	108	70	(16,25)
2.	Republik Korea ¹	91	100	77	(8,30)
3.	Malaysia ¹	0	83	62	(24,55) ²
4.	Taiwan ¹	79	109	67	(7,78)
Price Undercutting³					
5.	Republik Korea	9	8	(7)	n/a
6.	Malaysia	0	25	8	n/a
7.	Taiwan	21	(2)	3	n/a
Price Suppression					
8.	HPP IDN	62	85	81	14,46
9.	Selisih ⁴	38	23	(11)	n/a

Sumber : BPS dan IDN, diolah.

1) Harga impor + MFN + THC

2) Persentase pertumbuhan harga *duplex board* impor dari Malaysia (P2 ke PP)

3) Selisih dari harga *duplex board* IDN dengan harga *duplex board* impor negara yang dituduh dumping

4) Selisih harga IDN dengan HPP IDN

54. Perbandingan perkembangan harga jual IDN dengan harga impor *duplex board* selama periode penyelidikan dapat dilihat pada Tabel 7. Tabel ini menggambarkan kenaikan atau penurunan harga impor *duplex board* dibandingkan dengan harga IDN pada P1.
55. *Price undercutting* adalah suatu keadaan dimana harga *duplex board* impor negara yang dituduh dumping dijual di bawah harga *duplex board* IDN. Hal ini berarti, jika selisih dari kedua harga tersebut positif, maka terjadi *price undercutting*. Pada Tabel 8 terlihat bahwa *price undercutting* terjadi pada produk impor *duplex board* yang berasal dari Malaysia dan Taiwan, masing-masing sebesar 8 dan 3 indeks poin. Untuk Republik Korea, pada P1 dan P2 harga impor Republik Korea selalu berada di bawah harga jual IDN, yang menunjukkan terjadinya *price undercutting*, masing-masing sebesar 9 dan 8 indeks poin. Pada PP, harga impor dari Republik Korea berada di atas harga jual IDN dan data menunjukkan tidak terjadi *price undercutting* (- 7 indeks poin), Namun sebenarnya ini terjadi karena IDN telah menjual di bawah HPP sehingga seolah-olah perusahaan di Republik Korea tidak melakukan *price undercutting*.
56. Pada Tabel 8 di atas, terlihat bahwa selama periode penyelidikan, harga dalam negeri mengalami penurunan dengan tren 16,25% (*price depression*). Pada saat yang sama HPP IDN justru meningkat dengan tren yang hampir sama dengan tren penurunan harga IDN, yaitu sebesar 14,46%. Hal ini menunjukkan kecenderungan IDN untuk akan selalu menjual di bawah HPP (jual rugi).

Keadaan ini sudah ditandai pada periode PP dimana harga domestik IDN (70 indeks poin) sudah lebih rendah dibandingkan HPP (81 indeks poin), atau rugi sebesar 11 indeks poin.

57. *Price suppression* adalah kondisi dimana IDN tidak dapat meningkatkan harga jualnya mengikuti peningkatan HPP karena adanya barang impor dengan harga yang lebih rendah. Berdasarkan keterangan di atas, dapat dikatakan bahwa IDN mengalami *price suppression* dari ketiga negara. Terkait dengan harga dari Republik Korea yang pada PP lebih tinggi dari harga IDN, ini terjadi karena IDN sudah menjual di bawah HPP.
58. *Price depression* adalah kondisi dimana IDN terpaksa menurunkan harga jualnya karena tertekan oleh harga impor yang mengandung dumping. Berdasarkan keterangan di atas, tekanan harga impor yang terjadi secara berkepanjangan ini menyebabkan IDN terpaksa menurunkan harga jualnya (P1 - PP) agar dapat bersaing dengan barang impor. Bahkan IDN sudah menjual di bawah HPP. Pada akhirnya kondisi ini akan mengurangi keuntungan dan bahkan menyebabkan kerugian IDN.
59. Berdasarkan nomor 48 s.d. 58, terjadi hubungan sebab akibat antara dumping dan kerugian yang ditandai dengan terjadinya dampak volume baik secara absolut maupun relatif dan terjadi dampak harga (*price undercutting*, *price depression*, dan *price suppression*).

B.6. FAKTOR LAIN

B.6.1 Perkembangan Ekspor Pemohon

Tabel 9. Volume Penjualan IDN berdasarkan Indeks Poin P1 Domestik

No	Uraian	P1		P2		PP		%
		Indeks Poin	%	Indeks Poin	%	Indeks Poin	%	
1.	Domestik	100	69,36	88	74,35	91	69,84	(4,45)
2.	Ekspor	44	30,64	30	25,65	39	30,16	(5,53)
3.	Total	144	100,00	118	100,00	131	100,00	(4,78)

Sumber: IDN diolah.

60. Pada tabel 9 di atas terlihat bahwa selama periode penyelidikan, total volume penjualan IDN, baik di pasar domestik maupun ekspor, mengalami penurunan dengan tren sebesar 4,78%, meskipun persentase terhadap total penjualannya relatif tidak berubah. Tabel yang sama menunjukkan bahwa proporsi penjualan domestik IDN lebih dominan dibandingkan dengan penjualan ekspor. Dengan demikian, kerugian IDN pada penyelidikan ini lebih disebabkan dari terganggunya pasar domestik (terjadinya dumping).

B.6.2 Konsumsi Nasional

61. Dengan menggunakan Tabel 6 dan penjelasan pada nomor 47, terlihat bahwa selama periode penyelidikan, konsumsi nasional *duplex board* mengalami peningkatan dengan tren sebesar 3,85%. Peningkatan ini seharusnya dapat dimanfaatkan oleh IDN, namun demikian dari Tabel yang sama terlihat bahwa peningkatan tersebut justru lebih banyak dimanfaatkan oleh barang impor dumping (tren 48,60%). Sedangkan tren penjualan domestik justru menurun sebesar 6,66%.

B.6.3 TEKNOLOGI

62. Berdasarkan data dan informasi dari IDN maupun dari eksportir atau produsen yang kooperatif, serta *on site verification*, teknologi yang digunakan oleh industri dalam negeri untuk memproduksi *duplex board* tidak berbeda dengan teknologi yang digunakan oleh produsen di Republik Korea, Malaysia, dan Taiwan, Teknologi tersebut merupakan teknologi dari Jerman.

B.7. TANGGAPAN PIHAK YANG BERKEPENTINGAN

Semua tanggapan berikut merupakan tanggapan tertulis yang diterima KADI dari perusahaan yang kooperatif dalam penyelidikan setelah penerbitan Laporan Data Utama dan dengar pendapat publik.

B.7.1 Hansol Paper Co., Ltd. (Eksportir)

63. Margin Rendah dan De Minimis

Margin dumping Hansol rendah dan mendekati ambang batas de minimis sebagaimana diatur dalam Pasal 6 ayat (2) PP 34/2011 dan Pasal 5.8 Perjanjian Anti-Dumping WTO. Berdasarkan ketentuan tersebut, penyelidikan terhadap Hansol harus dihentikan karena margin tersebut tidak cukup untuk menimbulkan kerugian material.

Jawab:

Berdasarkan hasil penyelidikan, KADI menemukan adanya dumping yang dilakukan Hansol (4,04%). Penyelidikan terhadap Hansol tidak dapat dihentikan, karena sesuai Pasal 6 ayat (2) PP 34/2011 dan *Article 5.8 ADA*, ambang batas de minimis dari margin dumping adalah 2%.

64. Pengurangan Biaya yang Tepat Harus Diterima

Penolakan KADI terhadap pengurangan biaya [DIRAHASIAKAN] bertentangan dengan persyaratan perbandingan yang adil sebagaimana diatur dalam Pasal 2.4 Perjanjian Anti-Dumping WTO. Biaya penjualan yang terdokumentasi dan memengaruhi keterbandingan harga, termasuk biaya [DIRAHASIAKAN], harus dikurangkan secara tepat dari nilai normal. Biaya [DIRAHASIAKAN] Hansol sepenuhnya dapat ditelusuri, sesuai dengan K-GAAP?, dan telah diaudit,

sehingga harus diterima sebagai pengurangan yang sah dalam perhitungan margin

Jawab:

KADI dapat menerima tanggapan yang disampaikan oleh Hansol dan telah menyesuaikan perhitungan margin dumping, sebagaimana telah disampaikan pada nomor 32.

65. Tidak Ada Penurunan Harga dalam Periode Terakhir

Laporan Data Utama KADI sendiri menunjukkan bahwa pada periode penyelidikan terbaru (PP), harga ekspor Hansol berada di atas harga industri dalam negeri, yang menunjukkan tidak adanya *undercutting* harga dan tidak ada hubungan sebab-akibat dengan kerugian.

Jawab:

Pada Bagian B.5.2 dampak harga, meskipun tidak terjadi *price undercutting*, namun terjadi *price depression* dan *price suppression* selama periode penyelidikan. Hal ini diperkuat pada Article 3.2 ADA yang menyatakan :

*“.... With regard to the effect of the dumped imports on prices, the investigating authorities shall consider whether there has been a significant price undercutting by the dumped imports as compared with the price of a like product of the importing Member, or whether the effect of such imports is otherwise to depress prices to a significant degree or prevent price increases, which otherwise would have occurred, to a significant degree. **No one or several of these factors can necessarily give decisive guidance**”*

66. Pertimbangan Kepentingan Nasional

Berdasarkan Pasal 25 ayat (1) PP 34/2011, KADI wajib mempertimbangkan kepentingan nasional sebelum mengenakan bea masuk. Papan duplex Hansol merupakan bahan baku penting bagi sektor kemasan, percetakan, FMCG, dan makanan & minuman. Pengenaan bea masuk akan merugikan industri hilir yang jauh lebih besar, menurunkan daya saing, dan membebani konsumen Indonesia.

Jawab:

Tugas KADI adalah menangani permasalahan yang berkaitan dengan upaya penanggulangan importasi Barang Dumping dan barang mengandung Subsidi. Hal-hal terkait dengan pertimbangan kepentingan nasional, akan dibahas dalam rapat antar kementerian/lembaga sebelum Menteri Perdagangan menerima atau menolak rekomendasi yang disampaikan KADI (Pasal 25 PP 34/2011).

67. Tidak Ada Hubungan Sebab-Akibat

Jelas bahwa tidak ada hubungan sebab-akibat sebagaimana yang dituduhkan dan disimpulkan oleh KADI. Hal ini karena penyebab utama penurunan penjualan domestik Indonesia dan depresiasi harga berasal dari tantangan industri dalam negeri sendiri dan faktor biaya yang dipengaruhi oleh kebijakan sehingga mengakibatkan efisiensi yang tidak optimal, bukan dari impor barang yang diselidiki dari luar negeri. Oleh karena itu, penarikan hubungan sebab-akibat oleh KADI dalam Laporan Data Utama, dan tuduhan dumping ini, menjadi tidak relevan.

Jawab:

Pada Bagian B.3 Perhitungan Margin dumping, B.4 Kinerja Ekonomi Industri Dalam Negeri dan Bagian B.5 Hubungan Sebab Akibat, terdapat dumping yang berasal dari Republik Korea, Malaysia, dan Taiwan. Selain itu KADI juga menemukan terjadinya kerugian materiel dan adanya hubungan kausal antara lain dampak volume (absolut maupun relatif) dan dampak harga (*price undercutting*, *price depression*, dan *price suppression*). Sehingga dapat disimpulkan bahwa dumping yang berasal dari Republik Korea, Malaysia, dan Taiwan menjadi penyebab kerugian dari IDN.

68. Proporsionalitas dan Penghentian

Dengan mempertimbangkan margin yang rendah, tidak adanya hubungan sebab-akibat, serta dampak negatif yang signifikan terhadap pengguna hilir, pengenaan bea masuk terhadap Hansol akan bertentangan dengan kerangka hukum Indonesia dan kewajiban internasional Hasil yang tepat adalah penghentian penyelidikan terhadap Hansol sesuai dengan Pasal 6 ayat (2) dan Pasal 25 PP 34/2011, serta Pasal 5.8 Perjanjian Anti-Dumping WTO.

Jawab:

Lihat tanggapan pada nomor 63, 65, 66 dan 67.

B.7.2 Hanchang Paper Co., Ltd. (Eksportir)

69. Kami mencatat bahwa KADI telah memperluas lingkup penyelidikan yang diminta Pemohon yaitu "Karton Dupleks Dilapisi Satu Sisi [latar abu-abu] dari 210 sampai 450 gram" menjadi hanya "Kertas/Karton Kemasan Dupleks". Hal ini berakibat cakupan produk yang lebih luas dan perlindungan berlebihan terhadap industri dalam negeri. Perbedaan ini jelas mengimplikasikan bahwa KADI telah mengubah definisi Barang Yang Diselidiki dan sebagai konsekuensinya memperluas cakupan produk seperti yang ditunjukkan di bawah ini. Oleh karena itu, Penyelidikan ini harus dihentikan dengan segera karena adanya kesalahan lingkup produk yang diselidiki, sehingga data-data yang disampaikan oleh Pemohon terkait dengan kerugian juga menjadi tidak tepat, karena adanya perbedaan lingkup produk yang diselidiki.

Jawab:

Pada Bagian B.1 Barang yang diselidiki dan barang sejenis, KADI melakukan penyelidikan terhadap “kertas karton (mulai dari 210 hingga 450 gram/sqm) multilapis dengan permukaan atas dominan warna putih, dan permukaan belakang berwarna abu-abu” yang masuk dalam pos tarif Ex. 4810.32.90 dan Ex. 4810.92.90. Sehingga data yang disampaikan kepada KADI baik dalam permohonan dan jawaban kuesioner hanya terkait dengan duplex board sesuai dengan cakupan barang yang diselidiki.

70. Impor dari Korea harus dikeluarkan dari perhitungan, karena jelas bahwa impor dari Korea tidak bersaing dengan produk dalam negeri maupun bersaing dengan impor dari Malaysia dan Taiwan.

Jawab:

Duplex board yang diproduksi oleh IDN memiliki kualitas yang telah diterima pasar. Hal ini terbukti dengan diterimanya produk IDN di pasar ekspor, antara lain di Vietnam, Thailand, Mexico, Nigeria, dan Afrika Selatan. Disamping itu, proses produksi dan teknologi mesin yang digunakan oleh IDN juga sama dengan proses produksi dan teknologi yang dipakai oleh eksportir di negara yang dituduh dumping

71. Impor dari Korea tidak menimbulkan kerugian material bagi industri dalam negeri, karena tidak ada dampak secara absolut maupun relatif terhadap konsumsi di pasar Indonesia dan tidak ada efek penurunan harga.

Jawab:

Lihat tanggapan pada nomor 67.

72. Volume ekspor Hanchang Paper ke Indonesia relatif kecil selama periode penyelidikan dan diperkirakan untuk terus menjadi yang terkecil karena kapasitas produksinya yang relatif lebih rendah dibandingkan dengan produsen Korea lainnya.

Jawab:

Pada Pasal 6 PP 34/2011 dan Article 5.8 ambang batas negligible bagi negara yang dapat dituduh dalam penyelidikan antidumping adalah 3%. berdasarkan data BPS share 22% sehingga KADI melakukan penyelidikan terhadap Republik Korea.

73. Terdapat potensi timbulnya konflik perdagangan, karena eksportir Korea juga terutama pulp dan produk kertas bukan Barang Yang Diselidiki yang diproduksi oleh produsen Indonesia. Sehingga apabila dumping dikenakan secara tidak adil akan berdampak negatif terhadap surplus perdagangan industri kertas dan pulp Indonesia dan kepentingan nasional.

Jawab:

Lihat tanggapan nomor 66.

B.7.3 XSD International Paper Sdn. Bhd. (Eksportir)

74. *FSC-capable and well-managed producers do not support the case. Only non-FSC or quality-challenged producers support it. This proves injury stems from competitive disadvantage, not dumped imports. Notably, 39% of the industry does not support case establishment.*

Jawab:

Meskipun IDN Pemohon tidak memproduksi duplex board dengan sertifikat FSC, namun masih terdapat idn lainnya yang dapat memproduksi duplex board bersertifikat FSC, seperti PT Fajar Surya Wisesa Tbk, PT Dayasa Aria Prima, PT Mega Surya Eratama, dan PT Suparma Tbk. Disamping itu juga terdapat impor duplex board yang sudah bersertifikat FSC yang berasal dari RRT, Hongkong, Jepang, Finlandia.

FSC merupakan salah satu kriteria mutu produk namun bukan merupakan kriteria dumping, sehingga tidak dapat dipertimbangkan dalam perhitungan margin dumping

75. *Importing Companies Face Closure Indonesian companies import FSC duplex board employing sales, logistics, quality control, and administrative staff. Cannot switch to domestic supply: PT Indah Kiat lacks FSC, PT Fajar has quality issues, other FSC producers insufficient capacity (19% only). Business model becomes unviable.*

Jawab:

Telah disampaikan pada nomor 74.

76. *ASEAN Integration Contradicted (Source: KADI Report Table 5 (page 15))*

Indonesia-Malaysia agreements: ATIGA 0% tariff, RCEP 0% tariff Duties contradict strategic regional integration, invite retaliation, damage Indonesia's trade reputation, undermine ASEAN Economic Community.

Jawab:

Pos tarif Barang Yang Diselidiki memiliki tarif MFN dan tarif preferensi dalam perjanjian kerja sama perdagangan internasional, dimana hal ini secara relatif dapat mempengaruhi perubahan pola perdagangan ekspor WISCO ke Indonesia, yaitu diantaranya mencakup kerjasama ACFTA, ATIGA, AHKFTA, dan RCEP-China. Meskipun terdapat tarif preferensi, apabila Barang Yang Diselidiki terbukti dumping, penerapan BMAD tetap dapat dikenakan mengingat bahwa BMAD merupakan bea masuk tambahan dari bea masuk

umum (*Most Favoured Nation*) atau bea masuk preferensi berdasarkan perjanjian internasional.

B.7.4 Embassy of The Republic of Korea

77. *The scope of the subject product under investigation should be clearly limited to the range of items identified by the petitioner. The petitioner defined the scope of the subject product as "one side coated duplex board (grey back) from 210 to 450 grams. The petitioner limited the subject product to "grey back" products, but HS Codes 4810.32 and 4810.92 that currently form the basis of the industry injury index also cover "white back" products and "folding box board" products, resulting in an improper expansion of the scope of the subject product. In addition, as these HS Codes include all basis weights (GSM), the investigation extends to products outside the range of 210 to 450 GSM identified by the petitioner as the scope of the subject product.*

Jawab:

Lihat tanggapan pada nomor 69.

78. *The petitioner alleges that the domestic industry has suffered injury due to the cumulative effects of imports of the subject product from Korea and other exporting countries. However, imports from Korea should not be included in such a cumulative assessment with imports from other exporting countries. Pursuant to Article 3.3 of the WTO Anti-Dumping Agreement, a cumulative assessment is appropriate only when the conditions of competition warrant such an assessment. In this case, imports from Korea do not compete with imports from other exporting countries or with Indonesian domestic products. Products imported from Korea are high-quality products sold at prices significantly higher than those of imports from other exporting countries or Indonesian domestic products. In fact, the differences in conditions of competition demonstrate that imports from Korea have not caused material damage to the domestic industry in Indonesia.*

Jawab:

Lihat tanggapan nomor 65.

79. *Korea is a major export market for Indonesia's pulp and paper products, with Indonesia recording an annual trade surplus of over USD 300 million. Korean exporters are major customers of Indonesian pulp and paper products, using these products as raw materials in the manufacture of goods for export. This anti-dumping investigation directly concerns these Korean exporters. As a result, imposing unnecessary anti-dumping duties on imports from Korea could negatively affect trade relations between the two countries and, in turn, have an adverse impact on the interests of the Indonesian pulp and paper industry.*

Jawab:

Lihat tanggapan nomor 66.

80. *If anti-dumping duties are imposed, such measures could cause harm to downstream industries and consumers in Indonesia. Restricting imports of high-quality Korean duplex board would subject numerous Indonesian manufacturers of packaging materials, printed materials, and other products that use as a raw material to the double burden of higher costs and reduced quality. Ultimately, this burden may be passed on to Indonesian consumers*

Jawab:

Lihat tanggapan nomor 66.

B.7.5 PT Amerta Niagatama (Importir)

81. Harga dupleks di pasar Indonesia ditentukan oleh Market leader / pemimpin pasar, dan sesuai data di laporan data utama KADI, yang memiliki pangsa pasar terbesar adalah Pemohon. Sehingga bila ingin menaikkan harga, sebetulnya tergantung dari pemimpin di pasar, bila pemimpin menaikkan harga, yang lain akan mengikuti.

Jawab:

Berdasarkan penyelidikan, IDN sudah menurunkan harga jualnya karena ada tekanan dari barang impor dumping yang berasal dari Republik Korea, Malaysia, dan Taiwan. Hal ini dilakukan agar IDN dapat bertahan di tengah gempuran barang impor dumping. Apabila IDN tidak menurunkan harga, dapat dipastikan harga IDN tidak dapat bersaing dengan barang impor dumping.

82. Sebagai informasi tambahan, harga jual distributor tahun ini sudah lebih tinggi daripada harga dupleks pabrik – pabrik di Indonesia. Hal ini juga bisa dilihat di Laporan data utama KADI. Sehingga alasan lain pelanggan membeli dupleks import bukan disebabkan oleh harga yang lebih murah, tapi karena ada kebutuhan yang tidak bisa dipenuhi oleh beberapa pabrik lokal, seperti misalnya sertifikasi FSC. Pabrik dupleks di Indonesia yang sudah FSC belum bisa memenuhi semua permintaan pelanggan yang membutuhkan FSC.

Masukan dari para pelanggan kami, secara kualitas, kertas dupleks import seperti Hansol dari Korea dan XSD dari Malaysia juga memiliki kestabilan kualitas yang lebih terjaga daripada beberapa pabrik lokal di Indonesia, yang bagi sebagian pelanggan, sangat penting untuk dapat memenuhi target kontrak dan efisiensi produksi.

Jawab:

Lihat tanggapan pada nomor 74.

83. Persaingan yang sehat dibutuhkan untuk mendorong industri dalam negeri untuk terus meningkatkan kualitas dan pelayanannya. Bila industri dalam negeri dimanjakan, akan merugikan pelanggan dan ekonomi secara keseluruhan, karena makin tertinggal oleh negara lain. Kuota impor sudah dijaga oleh Kementerian Kehutanan, sehingga tingkat persaingan sudah dijaga.

Jawab:

Penyelidikan yang dilakukan oleh KADI adalah bentuk perlindungan pemerintah untuk mengamankan pasar dalam negeri akibat adanya barang impor yang mengandung dumping. Kebijakan antidumping bertujuan untuk memulihkan kerugian IDN yang disebabkan oleh impor barang dumping (*unfair trade*) serta mengembalikan persaingan pada level yang sama. Kebijakan tersebut tidak menutup impor, sehingga industri dalam negeri masih tetap memiliki pilihan untuk dapat memperoleh bahan baku dari negara lain selain dari negara yang dituduh melakukan dumping.

84. Pengenaan tarif untuk kertas dupleks impor akan membuat produk impor setengah jadi semakin banyak masuk ke Indonesia, dimana saat ini hal tersebut sudah terjadi dan menyebabkan beberapa industri hilir terpengaruh secara bisnis. Perlu juga melindungi industri hilir.

Jawab:

Lihat tanggapan pada nomor 66.

B.7.6 PT Grafitecindo Ciptaprima dan PT Printec Perkasa (Importir)

85. Kualitas Produk Dan Spesifikasi Ekspor Bukan Substitusi Satu Sama Lain

Pelanggan kami di AS mensyaratkan toleransi teknis yang ketat dan kualitas yang berulang-misalnya ketebalan (*caliper*) dan kekakuan yang seragam, kehalusan/kemampuan cetak permukaan, serta target tingkat keputihan tertentu disertai ekspektasi nol cacat dan lead time yang andal selaras dengan jadwal peluncuran ritel. Ini bukan persyaratan kertas yang umum; melainkan spesifikasi yang kritis bagi merek dan tercantum dalam berkas vendor yang disetujui oleh peritel AS.

Kami memahami sebagian pabrik kertas di Indonesia mengoperasikan mesin yang sebanding. Namun dalam praktiknya, pabrik lokal belum menunjukkan kemampuan menjaga spesifikasi tersebut secara konsisten pada volume yang kami perlukan. Fakta bahwa beberapa grade domestik diterima di pasar lain tidak menjadikannya pengganti untuk program kami di AS. Apabila produk tidak lolos QA pembeli kami, produk tersebut bukan pengganti yang layak, terlepas dari kesamaan nominal.

Sebagai eksportir hilir, kami menanggung risiko penalti langsung atas setiap deviasi (*chargeback*, pembatalan pesanan, penurunan peringkat vendor).

Substitusi paksa ke grade lokal yang belum disetujui akan menyebabkan kerugian komersial segera kehilangan program dan kerusakan reputasi yang tidak dapat dipulihkan.

Jawab:

Lihat tanggapan pada nomor 66 dan 74.

86. Sertifikasi FSC Merupakan Persyaratan Akses Pasar De Facto

Pelanggan kami di AS mewajibkan serat bersertifikat FSC untuk kemasan berbasis kertas. Menggunakan kertas tanpa sertifikasi akan melanggar kebijakan pembeli dan berisiko pada *delisting*.

Pemohon utama dalam negeri tidak memasok *duplex board* bersertifikat FSC untuk grade yang kami gunakan. Walau beberapa pabrik Indonesia dapat memproduksi produk bersertifikat FSC, ketersediaan volume, kesesuaian grade, dan biaya terserah (*delivered cost*) saat ini belum memenuhi kebutuhan ekspor kami.

Sumber alternatif dari negara selain Korea, Malaysia, dan Taiwan yang memiliki sertifikasi FSC jarang menyediakan grade, volume, dan waktu pengiriman yang persis kami perlukan. Singkatnya, beralih pemasok sulit karena sertifikasi terbatas, pasokan ketat, dan biaya lebih tinggi bukan karena kami tidak bersedia berubah.

Jawab:

Lihat tanggapan pada nomor 74.

87. Dampak Terhadap Sektor Hilir Dan Kepentingan Nasional

Duplex Board merupakan bahan baku dasar untuk kemasan di berbagai kategori ekspor. Kenaikan harga akibat bea masuk akan menimbulkan efek berantai di rantai pasok ekspor, menaikkan harga FOB, dan mengikis daya saing Indonesia dibandingkan negara tetangga. Dampak ini juga terjadi di atas tekanan tarif resiprokal di pasar utama, semakin menekan margin dan membuat produk Indonesia kurang kompetitif di luar negeri.

Apabila pembeli luar negeri memindahkan program ke negara lain, upaya untuk mendapatkannya kembali hampir mustahil. Kehilangan posisi pasar bersifat permanen, bukan sementara.

Sektor konversi bersifat padat karya. Penurunan pesanan akan menurunkan utilisasi pabrik dan berdampak lanjutan pada tenaga kerja Indonesia serta perekonomian lokal. Dampak hilir ini akan melebihi manfaat jangka pendek bagi satu pemohon hulu, serta melemahkan rantai pasok ekspor yang selama ini dibangun Indonesia.

Komitmen People & Planet kami: Sebagai grup, kami sangat meyakini People & Planet. Kami berkomitmen menyediakan kesempatan kerja bagi masyarakat

Indonesia dan melindungi lingkungan dengan hanya menggunakan kertas bersertifikat FSC. Untuk mempertahankan komitmen ini, kami harus tetap menguntungkan dan kompetitif di pasar ekspor. BMAD yang diusulkan akan menaikkan biaya input dan membatasi akses ke grade FSC yang disetujui, sehingga secara langsung melemahkan kemampuan kami menjaga lapangan kerja di Indonesia dan standar lingkungan kami. Singkatnya, kebijakan ini akan merugikan misi kami untuk mendukung pekerja Indonesia sekaligus melindungi lingkungan.

Jawab:

Lihat tanggapan pada nomor 66, 74 dan 83.

88. Klarifikasi Atas Beberapa Butir Dalam Laporan Data Utama

Kami mencatat Laporan Data Utama menyebutkan:

- Produsen dalam negeri menggunakan teknologi yang serupa dengan eksportir yang diselidiki; dan
- Beberapa produsen domestik atau negara yang tidak diselidiki dapat memasok kertas bersertifikat FSC.

Pengalaman kami di lapangan menunjukkan bahwa kemiripan teknologi tidak menjamin keluaran berada pada rentang persetujuan yang disyaratkan pelanggan kami di AS. Hasil sangat bergantung pada bahan baku, kendali proses, sistem QA, dan konsistensi jangka panjang pada skala produksi. Untuk program kami, kondisi tersebut belum terpenuhi di dalam negeri untuk grade yang dimaksud.

Terkait pasokan FSC, kendalanya bersifat praktis: kombinasi sertifikasi, kesesuaian grade, ketersediaan volume, keandalan lead time, dan harga belum tersedia di dalam negeri maupun dari negara yang tidak diselidiki dengan cara yang memungkinkan kami mempertahankan harga ekspor yang kompetitif. Inilah sebabnya pemasok yang diselidiki tetap esensial untuk mempertahankan pesanan ekspor kami saat ini.

Jawab:

Lihat tanggapan pada nomor 66, 74 dan 83.

B.7.7 PT Catur Sukses Makmur

89. Berdasarkan Laporan Data Utama Penyelidikan Anti Dumping atas Impor Duplex Board yang berasal Republik Korea, Malaysia, dan Taiwan, pada halaman 11 disebutkan bahwa hasil perhitungan Auditor atau Tim Surveyor KADI atas margin dumping dari produk Duplex Board yang dijual produksi oleh Hansol Paper Co., Ltd ialah sebesar 4,59% (ad valorem) atau USO 0,027 per kg (spesifik), di mana jika dibandingkan dengan hasil temuan margin dumping dari pabrik kertas asing lain, nilai tersebut merupakan yang paling rendah,

sehingga hal tersebut bisa disimpulkan bahwa tidak ada niatan sama sekali dari Hansol Paper Co.,Ltd untuk sengaja merusak harga pasar/jual produk Duplex Board di Indonesia agar merugikan pabrik kertas lokal.

Jawab:

Lihat tanggapan pada nomor 63.

90. Produk Duplex Board dari Hansol Paper Co., Ltd merupakan produk yang telah dilengkapi oleh sertifikasi Forest Stewardship Council (FSC) di mana lisensi tersebut berlaku global dan diperuntukkan sebagai jaminan bahwa bahan baku dari produk tersebut berasal dari hutan yang dikelola secara bertanggung jawab dari aspek lingkungan, sosial, ekonomi, sehingga dapat dipercaya juga oleh pembeli/konsumen akhir bahwa produk tersebut mendukung pelestarian hutan dan praktik berkelanjutan. Di mana banyak perusahaan printing atau packaging lokal yang menjalankan bisnis di dalam negeri ataupun melakukan ekspor memprioritaskan sertifikasi tersebut.

Jawab:

Lihat tanggapan nomor 66.

91. Produk Hansol pun memiliki kualitas yang sudah diakui oleh beberapa negara maju di luar (contoh : Jepang, Amerika Serikat, dan sebagainya), di mana jika dipaksakan untuk dilakukan penggantian bahan baku produksi pada perusahaan printing atau packaging lokal yang menjalankan bisnis di dalam negeri ataupun ekspor, dikhawatirkan akan menyebabkan hambatan atau permasalahan baik materiil maupun non-materiil.

Jawab:

Lihat tanggapan nomor 74 dan 83.

B.8. KESIMPULAN DAN REKOMENDASI

B.8.1 Kesimpulan

92. Berdasarkan hasil penyelidikan, KADI menyimpulkan hal-hal sebagai berikut:
- a. Berdasarkan nomor 32 s.d. 37, telah terjadi praktik dumping yang dilakukan oleh beberapa perusahaan yang berasal dari Republik Korea, Malaysia, dan Taiwan.
 - b. Berdasarkan nomor 39 s.d. 47, beberapa indikator kinerja kinerja IDN selama periode 1 Januari - 31 Desember 2022 (P1), 1 Januari – 31 Desember 2023 (P2), 1 Januari – 31 Desember 2024 (PP) mengalami penurunan, antara lain penjualan domestik baik secara volume dan nilai, laba operasional, harga jual domestik, pangsa pasar, utilisasi kapasitas, produksi, produktifitas, ROI, dan pertumbuhan asset.

- c. Berdasarkan nomor 59, terdapat hubungan sebab akibat antara dumping dan kerugian yang dialami IDN yang dinyatakan dengan:
- i. adanya dampak volume baik secara absolut dan relatif.
 - ii. adanya dampak harga secara *price undercutting* yang diakibatkan oleh impor dumping yang berasal dari Malaysia dan Taiwan
 - iii. adanya dampak harga secara *price depression* dimana IDN terpaksa menurunkan harga jualnya karena tertekan oleh harga impor yang mengandung dumping yang berasal dari Republik Korea, Malaysia, dan Taiwan.
 - iv. adanya dampak harga secara *price suppression* dimana IDN tidak dapat meningkatkan harga jualnya mengikuti peningkatan HPP karena adanya barang impor dengan harga yang lebih rendah.

93. Berdasarkan hal-hal tersebut di atas, KADI menyimpulkan bahwa terjadi dumping yang menyebabkan IDN mengalami kerugian materiel serta terjadi peningkatan impor barang dumping baik secara absolut maupun relatif dan terjadinya *price undercutting*, *price depression*, dan *price suppression*.

B.8.2 Rekomendasi

94. Berdasarkan kesimpulan hasil penyelidikan di atas, dan mempertimbangkan tanggapan yang disampaikan pihak yang berkepentingan, KADI merekomendasikan pengenaan BMAD terhadap impor “kertas karton (mulai dari 210 hingga 450 gram/sqm) multilapis dengan permukaan atas dominan warna putih, dan permukaan belakang berwarna abu-abu” yang masuk dalam pos tarif ex.4810.32.90 dan ex.4810.92.90 yang berasal dari Republik Korea, Malaysia, dan Taiwan dengan besaran BMAD sebagai berikut:

Tabel 10. Rekomendasi Besaran BMAD

Negara	Produsen/Perusahaan	Besaran BMAD	
		<i>Ad valorem</i> (%)	Spesifik (USD/kg)
Republik Korea	Hansol Paper Co., Ltd.	4,04	0,024
	Hanchang Paper Co., Ltd.	26,52	0,14
	Perusahaan Lainnya	26,52	0,14
Malaysia	XSD International Paper Sdn. Bhd.	7,79	0,036
	Perusahaan Lainnya	7,79	0,036
Taiwan	Seluruh Perusahaan di Taiwan	29,06	0,14

95. Bea Masuk Anti Dumping diusulkan berlaku selama 5 (lima) tahun sejak tanggal diundangkan.

Jakarta, Desember 2025
Komite Anti Dumping Indonesia