

Initiation of Safeguard (Quantitative Restrictions) investigation concerning imports of Soda Ash into India - reg.

1 message

भाविक प्रभुदासभाई लुक्का/BHAVIK Prabhudasbhai LUKKA LUKKA <dd18-dgtr@gov.in> Thu, Mar 19, 2026 at 5:59 PM
To: newdelhi <newdelhi@pd.state.gov>, acsnd <acsnd@state.gov>, Chatwalk <Chatwalk@state.gov>, iranembdel
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F. No. 22/01/2026-DGTR
Government of India
Ministry of Commerce & Industry
Department of Commerce
Directorate General of Trade Remedies
IV Floor, Jeevan Tara Building, 5, Parliament Street, New Delhi

CASE

ID. QR/OI/001/2026

Dated: 19th March 2026

To

The Embassies of the Exporting Countries**Subject: Initiation of Safeguard (Quantitative Restrictions) investigation concerning imports of Soda Ash into India - reg.**

Madam/ Sir,

1. The undersigned is directed to inform that a Safeguard (Quantitative Restrictions) investigation concerning imports of Soda Ash into India has been initiated by the Designated Authority. A copy of the Initiation Notification F. No. 22/01/2026-DGTR dated 16th March, 2026 issued by the Authorised officer is available at: <https://www.dgtr.gov.in/en/safe-guard-investigation-india/initiation-safeguard-quantitative-restrictions-investigation-0>
2. The exporters and other interested parties known to the Authority to be concerned with the above-mentioned investigation are being requested separately to furnish the relevant information in the form of response to exporter's questionnaire and offer their comments, if any. However, it is possible that either the addresses are not complete or

their email ids are not available or all exporters of the subject goods might not have been intimated directly by the Authority. It is, therefore, requested that this investigation may be brought to the notice of all concerned. The Questionnaire may be downloaded from references given below.

3. The exporters/ producers having interest in export of the subject goods to India may be advised to file comments on the claims of confidentiality **within 7 days from the date of this letter** and on the scope of the product under consideration (PUC), and product control numbers (PCNs), if any, **within 15 days of from the date of this letter/email**.

4. The Authorised officer emphasizes that the exporter/ producer should avoid making simple assertions and unsubstantiated claims in this regard. The Authorised officer shall not consider such submissions for PUC/PCNs. All submissions by the exporter/ producer with respect to the PUC/PCNs should be duly supported with verifiable documentary evidence, particularly when demonstrating differences in costs and prices of PCNs being proposed or requesting product type exclusion. Exporter/ producers are further advised to provide a clear PCN methodology/ structure if proposing the PCNs.

5. Further, such exporters/ producers may be advised to file the questionnaire response **within 37 days commencing from the date of intimation to the interested parties about the initiation of safeguard investigation**.

6. All interested parties are required to register themselves on the SETU Portal (<https://setu.dgtr.gov.in/>) in order to participate in the investigation. In case of any difficulty in registering as an interested party, the DGTR's SETU Helpdesk may be contacted through the details provided at <https://setu.dgtr.gov.in/help-desk>. All communications and submissions from the interested parties must be filed through the SETU Portal under their registered name and the corresponding Case ID mentioned above. Interested parties are required to ensure that the narrative part of the submissions is filed in searchable PDF/MS Word format, while the data files must be submitted in MS Excel format with properly linked calculations.


7. The interested parties are further advised to keep a regular watch on the official website of the Directorate General of Trade Remedies at www.dgtr.gov.in and SETU portal (<https://setu.dgtr.gov.in>) for any updated information with respect to this investigation.

Dr. Bhavik Prabhudasbhai Lukka, IES
Deputy Director (Economics)
DGTR, Ministry of Commerce & Industry
Government of India
Tel. No.: 011-23408707
Email: dd18-dgtr@gov.in

Reference:

1. Exporter's Questionnaire Response: <https://dgtr.gov.in/sites/default/files/2026-03/1.%20Exporter%20Questionnaire%20-%20SGQR%20-%20Soda%20Ash.pdf>
2. Economic Interest Questionnaire Response: <https://dgtr.gov.in/sites/default/files/2026-03/5.%20Economic%20Interest%20Questionnaire.pdf>
3. Non-confidential version (NCV) of the application (attached with this letter)
4. Letter/ Email to exporters/ producers (attached with this letter)

2 attachments

 **NCV - Soda Ash Safeguard (QR) - Application Annexures.pdf**
6820K

 **Letter Email to exporters producers.pdf**
216K

Initiation of Safeguard (Quantitative Restrictions) investigation concerning imports of Soda Ash into India - reg.**भाविक प्रभुदासभाई लुक्का/BHAVIK Prabhudasbhai LUKKA
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Cc "सतीश कुमार/Satish Kumar"<consultant-dgtr@govcontractor.in>,"सुरज कुमार प्रधान/Suraj Kumar Pradhan"<dir15-dgtr@gov.in>,"अमित कुमार / Amit Kumar"<dir16-dgtr@gov.in>

**F. No. 22/01/2026-DGTR
Government of India
Ministry of Commerce & Industry
Department of Commerce
Directorate General of Trade Remedies
IV Floor, Jeevan Tara Building, 5, Parliament Street, New Delhi

CASE ID. QR/OI/001/2026

Dated: 19th March, 2026

To

Exporters/ Producers of the subject goods of subject country**Subject: Initiation of Safeguard (Quantitative Restrictions) investigation concerning imports of Soda Ash into India - reg.**

Madam/ Sir,

1. The undersigned is directed to inform that a safeguard (quantitative restrictions) investigation concerning imports of "**Soda Ash**" has been initiated by the Authorised officer designated under the Foreign Trade (Development and Regulation) Act, 1992 and the Safeguard Measures (Quantitative Restrictions) Rules, 2012 in respect of the subject matter mentioned above to investigate into the existence, degree and effect of sudden, sharp and recent significant increase in imports of product under consideration. A copy of the Initiation Notification No. **F. No. 22/01/2026-DGTR** dated 16th March, 2026 issued by the Authorised officer is available at: <https://www.dgtr.gov.in/en/safe-guard-investigation-india/initiation-safeguard-quantitative-restrictions-investigation-0>

2. As per the records available you are an exporter / producer of the subject goods. You may, therefore, be interested in participating in the investigation. The Authorised officer provides you an opportunity to defend your interests and assist the Authorised officer to arrive at a fair decision and, thus, requests you to file your response to the Questionnaire, given below.

3. The response must be in English. All supplementary information or other materials provided with it must be certified by the chief executive of your company as accurate, complete and presenting a true and fair view of the accounts and other data to be to the best of his knowledge and belief.

4. The purpose of the Questionnaire is to gather information required for completion of the investigation. It is important for your company to give the answers clearly and precisely, indicating the sources of information used, and wherever required, attaching supporting documents. Any worksheets or documents used to answer this questionnaire, which by any reason cannot be attached, shall be kept in the hands of the company and be made available for the purposes of further examination/verification.

5. Although a Questionnaire is given, the Authority reserves the right to call for any information in this regard at any time during the investigation and the course of this investigation. You may also submit any additional information relevant in this regard.

6. The applicant has proposed the most recent period of investigation (MRP) as 1st January 2025 – 30th September 2025 with injury examination period as 1st April 2020 – 31st March 2021, 1st April 2021 – 31st March 2022, 1st April 2022 – 31st March 2023, 1st April 2023 – 31st March 2024, 1st April 2024 – 31st December 2025, and the most recent period of investigation.

7. **Economic Interest Questionnaire:** The Authorised officer also requests you to share information as per the Economic Questionnaire given below, to assess the extent of impact on the user industry if the safeguard (quantitative restrictions) is imposed on Soda Ash.

8. We request you to give careful consideration to the Questionnaire, particularly to the question concerning merchandise characteristics. Specifically, we need to know the difference, if any, between the merchandise sold in your home market or in a third country and that sold in India.

9. All financial information is to be indicated in the local currency. Applicable conversion rate

of local currency to US Dollar for the relevant period may also please be made available/mentioned in each statement.

10. The information submitted in response to the Questionnaire must be certified by the Chief Executive of your company as accurate, complete and presenting a true and fair view of the accounts and other data to the best of his knowledge and belief.

11. The information furnished is subject to verification. You are, therefore, requested to convey your willingness to offer yourself for any verification by the Authority as per the given Performa. You are also advised to preserve all the working papers for such verification.

12. The response should be filed by e-mail not later than **thirty-seven days** from the date of issue of this email.

13. With respect to the non-confidential version of the application being shared along with this letter, the exporter/producer may file comments on the claims of confidentiality within 7 days from the date of this letter. Exporter/producer may submit their comments, if any, on the scope of the product under consideration (PUC), and product control numbers (PCNs) within 15 days of from the date of this letter/email. The Authorised officer emphasizes that the exporter/producer should avoid making simple assertions and unsubstantiated claims in this regard. The Authorised officer shall not consider such submissions for PUC/PCNs. All submissions by the exporter/producer with respect to the PUC/PCNs should be duly supported with verifiable documentary evidence, particularly when demonstrating differences in costs and prices of PCNs being proposed or requesting product type exclusion. Exporter/producers are further advised to provide a clear PCN methodology/structure if proposing the PCNs.

14. This 15-day period shall run concurrently with the 37-day total as per Rule 6(4) (read with explanation thereto) of the Safeguard Measures (Quantitative Restrictions) Rules, 2012 timeline starting from the date of this letter/email.

15. Extension due to Modification of PUC/PCN: An extension of time by 15 days shall be granted if the Authorised officer, through a subsequent notice, modifies the PUC, and PCN that was not previously proposed or is different from the initiation notification. This extension of 15 days shall be granted from date of such notification of modified PUC and PCN. Extension of time by 15 days stated in this paragraph is not applicable in instances where there is no change in the PUC, and PCN methodology after initiation of investigation. Requests for a further extension of time, beyond the 15-day extension (if granted), will ordinarily not be considered except in case of exceptional circumstances, in line with the Rule 6(4) of the Safeguard Measures (Quantitative Restrictions) Rules, 2012.

16. In case you wish to appoint a person/firm to represent your interests, you may please issue a proper authorization in favour of such person/firm.

17. If no response is received within the time stipulated in this letter, it would be presumed that you have no comments to offer. Your attention is specifically drawn to the Safeguard Measures (Quantitative Restrictions) Rules, which authorize the Authorised officer to record its findings on the basis of facts available to it in case of non-cooperation from the interested parties.

18. Confidential Information: The answer to the Questionnaire must be submitted in two versions: one confidential version and another non-confidential version; for the latter the inclusion of a non-confidential summary will be required, allowing for a reasonable understanding of the information and/or supporting documents deemed confidential. For those cases where the submission of this summary is not possible, such circumstances must be convincingly explained.

19. An interested party supplying information must ensure that all the information supplied is clearly marked either "confidential" or "non-confidential" at the top of each page. Information supplied without any mark shall be treated as non-confidential and the Authority shall be at

liberty to allow the other interested parties to inspect any such non-confidential information. Confidential information must be accompanied by a non-confidential summary or, if it is not susceptible to summarization, a statement of the reasons why summarization is not possible. However, if the Authority is satisfied that the request for confidentiality is not warranted, or the supplier of the information is either unwilling to make the information public or to authorize its disclosure in a generalized or summary form, the Authority may disregard such information. A copy of all non-confidential submissions should be shared by e-mail by all interested parties with all other interested parties participating in the investigation.

20. The unit of measurement in the present investigation is in Metric Tons (MT). Therefore, the information needs to be supplied in MT as unit of measurement. In case the information is supplied in any other unit of measurement, it should be converted into an equivalent unit of measurement clearly mentioning and explaining the chosen calculation methodology.

21. As per Rule 6(6) of the Safeguard Measures (Quantitative Restrictions) Rules, 2012 “the Designated Authorised officer may allow an interested party or its representative to present the information relevant to the investigation orally but such oral information shall be taken into consideration by the Authorised Officer only when it is subsequently submitted in writing.”

22. You may contact this Office should you need any clarification and/or assistance in furnishing the information in the prescribed manner.

23. We appreciate your cooperation in providing the requisite information within the required time and assisting us in conducting the present investigation in a time bound manner.

24. All interested parties are required to register themselves on the SETU Portal (<https://setu.dgtr.gov.in/>) in order to participate in the investigation. In case of any difficulty in registering as an interested party, the DGTR’s SETU Helpdesk may be contacted through the details provided at <https://setu.dgtr.gov.in/help-desk> . All communications and submissions from the interested parties must be filed through the SETU Portal under their registered name and the corresponding Case ID mentioned above. Interested parties are required to ensure that the narrative part of the submissions is filed in searchable PDF/MS Word format, while the data files must be submitted in MS Excel format with properly linked calculations.

25. The interested parties are further advised to keep a regular watch on the official website of the Directorate General of Trade Remedies at www.dgtr.gov.in and SETU portal (<https://setu.dgtr.gov.in>) for any updated information with respect to this investigation.

Dr. Bhavik Prabhudasbhai Lukka, IES
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Reference:

1. Initiation Notification: <https://www.dgtr.gov.in/en/safe-guard-investigation-india/initiation-safeguard-quantitative-restrictions-investigation-0>
2. Exporter Questionnaire Response: <https://dgtr.gov.in/sites/default/files/2026-03/1.%20Exporter%20Questionnaire%20-%20SGQR%20-%20Soda%20Ash.pdf>
3. Economic Interest Questionnaire: <https://dgtr.gov.in/sites/default/files/2026-03/5.%20Economic%20Interest%20Questionnaire.pdf>

4. Non-confidential version of the application (*attached with this letter*)

1 Attachment(s)

NCV - Soda Ash Safeguard (Q...

6.6 MB

APPLICATION

SEEKING IMPOSITION OF

SAFEGUARD (QUANTITATIVE RESTRICTIONS)

ON IMPORTS OF

SODA ASH

BY

ALKALI MANUFACTURERS ASSOCIATION OF INDIA (AMAI)

FILED THROUGH



TPM CONSULTANTS

J-209 Saket, New Delhi-17

Phone – 49892200, Fax –26859341

Email – akg@tpm.in; rahul@tpm.in; divya@tpm.in; sneha@tpm.in

Confidentiality Reasoning
Safeguard (Quantitative restrictions) on imports of Soda Ash

SN	Information where confidentiality has been claimed	The reason/ justification for claiming confidentiality	Whether information is available in public domain or with any government authority from whom the same can be obtained by public without payment of fee
1.	Global Soda Ash – Market Report Annexure 3.3	Market report contains third party information procured from secondary sources which the applicant is not authorised to disclose. Relevant information has been provided in the submission along with name and source of the report.	No
2.	Injury information Annexure 6.1(a)	Information relating to sales value, inventory, cost of sales, selling price, profitability, depreciation, interest cost, cash profit, capital employed and return on capital employed of the Applicants are confidential, business sensitive information. Disclosure of this information would be of significant competitive advantage to the competitors. However, information in trend has been given.	No
3.	Statement of cost of production (company-wise) Annexure 6.1(b)	This contains information regarding individual applicant company's capacity, production, domestic sales, captive consumption, cost of raw materials consumed, profitability etc. Disclosure of this information would seriously impact interests of the applicant company. A summarisation of applicant companies, as a whole has been provided in trend.	No

SECTION I – GENERAL INFORMATION

1. The present application is being filed seeking imposition of Safeguard Measures in the form of Quantitative Restrictions Under Section 9A of The Foreign Trade (Development and Regulation) Act, 1992 read with the Safeguard Measures (Quantitative Restrictions) Rules, 2012 (hereinafter also referred to as “The Rules”) on imports of Soda Ash (hereinafter also referred to as the “product under consideration or the “subject goods”).

I. Date of Application: 27th January 2026

II. Applicant(s): Provide name(s) and address(es) of the applicant(s):

2. The present application is being filed by Alkali Manufacturers’ Association of India (hereinafter referred to as “AMAI” or “applicant” or “applicant association”). Following members of applicant association have provided necessary information for the present application (hereinafter referred to as “applicant companies”):

- i. DCW Limited
- ii. RSPL Limited
- iii. Nirma Limited
- iv. GHCL Limited
- v. Tata Chemicals Limited

3. Tuticorin Alkali Chemicals and Fertilizers Limited is the only other producer of subject goods in India.

4. Letters from the applicant association and applicant companies authorizing TPM Consultants to represent them in the present investigation have been enclosed herewith as **Annexure 1.1** and **Annexure 1.2**.

III. Domestic producers of the like or directly competitive products on whose behalf the application is filed (Give details of all domestic producers who support the application along with their IEC, where applicable):

5. The names and addresses of the applicant companies along with the details of the contact persons are provided below:

<p>DCW Ltd. “Nirmal” 3rd Floor, Nariman Point, Mumbai 400 021 or Contact Person - Mr. Amitabh Gupta, Senior Vice President Phone No. : *** Email: ***</p>	<p>RSPL Ltd. 119-121 (Part), Block P&T, Fazalganj, Kalpi Road, Kanpur-208012 Contact Person- Mr. Tinku Chhabra COO (Soda Ash Business) Phone No : *** E-mail: ***</p>
<p>Nirma Ltd. NCC Office, Krishna Nagar, Wadhawadi Road, Bhavnagar 364 002 Gujarat. Contact Person – Shri Akhil Maheshwari, Vice President Phone: *** Email - ***</p>	<p>GHCL Ltd B-38, GHCL House, Institutional Area, Sector-1, Noida, (U.P) Contact Person - Mr. Sunil Bhatnagar, Advisor Phone: *** Fax - *** Email - ***</p>
<p>Tata Chemicals Ltd. (TCL) Leela Business Park, Andheri-Kurla Road, Andheri (East) Mumbai – 400 059. Contact Person – Shri Rajesh Kamat, Head-sales & marketing Phone: *** Email - ***</p>	

IV. Information on production accounted for by the domestic producer of the like or directly competitive products:

6. The present application is being filed by Alkali Manufacturers’ Association of India, wherein data has been provided by DCW Ltd., RSPL Ltd., Nirma Ltd., GHCL Ltd. and Tata Chemicals Ltd. Apart from the applicant companies, Tuticorin Alkali Chemicals & Fertilizers Ltd. is the only other producer of subject goods in India. Production of applicant companies collectively constitutes 98% of Indian production during Jan-Sept., 2025 period. Information over the entire period is enclosed with this application.

V. Information on the total domestic production of the product concerned of the like or directly competitive products:

7. A statement showing production and share of the applicant companies in total Indian production has been enclosed herewith as **Annexure 1.3**. Production of these companies

collectively constitutes 98% of Indian production during Jan-Sept., 2025 period. Information over the entire period is enclosed with this application.

VI. Information on the total domestic production of the product concerned of the like or directly competitive products (in respect of all producers whether they support the application or not).

8. The information on the total domestic production is provided in **Annexure 1.3**. Applicant companies account for 98% of production of subject goods in India; and, therefore, satisfy the requirements under the Rules.

SECTION II – SUBJECT GOODS

I. Name of the product:

9. The present application is being filed for invoking Safeguard Measures in form of Quantitative Restrictions on imports of “Soda Ash”.

II. Description: Provide full description of the product including chemical formula, grade constituent materials/components, process of manufacture in brief, uses and inter-changeability of various grades, etc.:

A. Product Description:

10. The product under consideration is Disodium Carbonate, popularly known as Soda Ash, having chemical formula Na_2CO_3 . Soda Ash is a white, crystalline, water-soluble material. It has been referred as “Soda Ash” in this application. Soda Ash is produced in two forms by the Indian Producers - Light Soda Ash and Dense Soda Ash. The difference in the two types is bulk density. Further, soda ash can be either natural soda ash or synthetic soda ash. Both products are essentially the same. The present application includes all types and form of Soda Ash.

B. Grade Constituent Materials / Components:

11. Soda Ash is produced in two forms by the Indian Producers - Light Soda Ash and Dense Soda Ash. The difference in the two types is bulk density only. The product characteristics, production process, manufacturing technology, raw materials, manpower, functions & uses, customs classification and pricing of the light & dense soda ash are however the same, although for manufacturing dense soda ash, installation of additional equipment is required. Light soda ash can have usage in manufacture of sodium salts, glass, sodium silicates, bichromate, bi-carbonates, etc apart from the most common usage in the detergent sector. Similarly, while dense soda ash is used mainly for manufacturing glass, it can also find usage in manufacture of detergents, silicates, ultramarine, bi-chromate, etc. both the grades of soda ash, having many common usages, are technically and commercially substitutable.

12. Soda ash can be obtained through two routes - natural and synthetic. Both products are essentially the same. There is no difference in natural and synthetic soda ash in terms

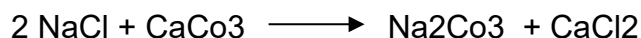
of product characteristics, functions and uses, customs classification and pricing of the product.

C. Process of Manufacture:

13. Soda Ash can be produced through synthetic route and natural route. Dissolution process is employed where natural deposits of Sodium Carbonate occur in a large scale, whereas various types of synthetic process is employed where these natural resources are not available like India.

14. In India, Solvay process or modifications commonly known as Dual Process and Akzo Dry Lime Process is employed. Whatever be the synthetic process, salt and limestone are the major raw materials required for producing soda ash. These two major raw materials are abundantly available in India in the State of Gujarat. In fact, production of soda ash is concentrated in the State of Gujarat in India.

15. Chemical reaction for production of soda ash through the Solvay process is as follows.



16. In Solvay process, the raw brine prepared by dissolving crude solar salt in raw water is purified by use of milk of lime and soda ash to prepare purified brine which is then ammoniated in ammonia absorber to prepare ammoniated brine. Ammoniated brine is carbonated to precipitate sodium bi-carbonate, which is then filtered to separate crude bi-carbonate cake, which is further heated to decompose into light soda ash.

17. Akzo dry lime process is a modification of the conventional solvay process to the extent that milk of lime slurry is not prepared and the heat of hydration of lime and of chemical reaction are sufficient to raise the mother liquor to the boiling temperature thereby reducing the steam and lime consumption in distillation process as compared to solvay process.

18. In the dual process, the ammonia recovery unit and milk of lime section are dispensed with and an ammonium chloride section exists where the ammonium chloride is crystallized and recovered. The production process flowchart is annexed here as **Annexure 2.1**.

19. Synthetic soda ash as stated above, is manufactured using the Solvay, Hou, or ammonia-soda process. The production process in Turkey, of natural Soda ash is solution mining of Trona. The trona mine is extracted to the surface by solution mining. Another production process employed in USA is the room and pillar method, where trona is mined and conveyed to the surface to be refined into dense soda ash.

D. Uses and interchangeability of various grades:

20. Soda Ash is an essential ingredient in the manufacture of detergents, soaps, cleaning compounds, sodium-based chemicals, float glass, container and specialty glasses, silicates and other industrial chemicals. It is also widely used in textiles, paper, metallurgical industries and desalination plants.

III. Tariff Classification: Provide the classification of the product under the HS classification as well as Indian Customs Tariff Classification at 6/8/10 digit level:

21. The product under consideration is classified under Chapter 28 of the Customs Tariff, under the tariff code 2836 20.

Tariff Item	Description of goods
2836	- <i>Carbonates; peroxocarbonates (percarbonates); commercial ammonium carbonate containing ammonium carbamate</i>
2836 20	- <i>Disodium Carbonate</i>

22. The above customs classification may kindly be treated as indicative and not binding on the scope of product under consideration. Relevant extract of Customs Tariff Act showing the customs classification is enclosed as **Annexure 2.2**.

IV. Import Duty: Provide information relating to rates of import duty levied during the past three years. If the product enjoys any concessional or preferential treatment, provide details:

23. The basic customs duty on the subject goods is 7.5%. In addition to this, cess of 10% applicable to the subject goods, which effectively makes it 8.25%.

V. Provide name(s) of country(ies) where the product has originated:

24. A statement showing country-wise imports from various countries is enclosed as **Annexure 2.3**.

VI. Provide a list of all known foreign producer, exporters & importers of the imported product, country-wise, together with names and addresses of concerned trade associations and user associations etc.:

25. Details of all known foreign producers and exporters are enclosed as **Annexure 2.4**.

26. A list containing names and addresses of importers and users has been enclosed as **Annexure 2.5**.

VII. Information on major industrial users, organization of industrial users and representative consumer organizations:

27. Lists of known users and associations of users of the subject goods in India has been enclosed as **Annexure 2.5** and **Annexure 2.6**.

VIII. Export price: Details of export price of the imported Product exporter/ country-wise and the basis thereof:

28. The C.I.F. price over the period is enclosed as **Annexure 2.7**.

SECTION III – INCREASE IN IMPORTS

I. Preliminary Submissions

29. At the outset, applicant submits that the increased imports have been well explained in various WTO decisions to mean a sudden, sharp and significant increase in imports in recent period. However, the WTO jurisprudence also provides that this recent period is not limited to the very end of the injury period. The Authority is required to consider the entirety of injury period and thereafter come to a conclusion whether imports in the recent period constitute increased imports. The applicants have extracted various WTO decisions in this regard hereinbelow.

A. Meaning of “recent increase in imports”

30. The Panel found, In US — Line Pipe¹ that in a statement not reviewed by the Appellate Body, that the word “recent” implies a “retrospective analysis”; but that it does not imply an analysis of the conditions immediately preceding the authority’s decision **nor does it imply that the analysis must focus exclusively on conditions at the very end of the period of investigation:**

*“[W]e note that the Appellate Body in Argentina-Footwear Safeguard found that ‘the phrase “is being imported” implies that the increase in imports must have been sudden and recent’. According to Korea, the phrase ‘is being imported ... in such increased quantities’ refers to ‘the period immediately preceding the authority’s decision’. The word ‘recent’ — which was used by the Appellate Body in interpreting the phrase ‘is being imported’ — is defined as ‘not long past; that happened, appeared, began to exist, or existed lately’. In other words, the word ‘recent’ implies some form of retrospective analysis. **It does not imply an analysis of the conditions immediately preceding the authority’s decision. Nor does it imply that the analysis must focus exclusively on conditions at the very end of the period of investigation.** We consider that an analysis that compares the first semester of 1998 with the first semester of 1999 is not inconsistent with the requirement that the increase in imports be ‘recent’.”*

31. In Steel safeguard (Turkey)², increased import analysis by the European Commission was challenged by Turkey. The WTO Panel upheld the analysis made by the European Commission.

*7.183 In our view, if a complainant in WTO dispute settlement alleges that the increase in imports found by an authority is not sudden, significant, sharp, or recent enough³³⁶, it bears the onus of adducing the reference point or benchmark against which to ascertain what may or may not be “enough”. **This is because the concept of “enough” is relational. Something is “enough” in relation to something else. What qualifies as “enough” cannot exist in the abstract untethered from some reference point or benchmark for ascertaining what is “enough”.***

¹ Panel Report, United States – Definitive Safeguard Measures on Imports of Circular Welded Carbon Quality Line Pipe from Korea (US – Line Pipe), WT/DS202

² Panel Report, European Union – Safeguard Measures on Certain Steel Products (EU-Safeguard Measures on Steel (Turkey)), WT/DS595

7.184. We note that our understanding in this regard accords with that of the panel in US – Steel Safeguards, which observed that the question of whether, in that instance, an increase in imports was "sudden, sharp and significant enough as to cause serious injury is a question that is appropriately to be addressed in the context of causation of serious injury, not in the context of the condition of the increase, where no well-founded judgment in this regard can be made".³³⁷

7.188 "...Turkey points to characteristics exhibited by the increase itself. For instance, Turkey refers to the 3% year-on-year rate of increase at the end of the POI. **Turkey also considers it significant that the bulk of the increase in imports found by the European Commission took place earlier in the POI and subsequently decelerated. However, Turkey does not link these characteristics to the situation of the domestic industry to show that the increase was not sudden, significant, sharp, or recent enough to threaten to cause serious injury.**

7.189. We therefore find that Turkey has not established that the European Commission did not demonstrate a sufficient increase in imports under Articles 2.1 and 4.2(a) of the Agreement on Safeguards and Article XIX:1(a) of the GATT 1994.

32. The fact in regard to increase in imports considered by the EC in the Steel Safeguard Case³ is similar to that of the present case. Table below shows the movement of imports in the EC Steel safeguard case.

Year	2013	2014	2015	2016	2017	MRP
Imports (000 tonnes)	18,329	21,868	26,552	29,141	30,094	31,314
Index 2013 = 100	100	119	145	159	164	171
Market share	12.7%	14.4%	16.9%	17.9%	18.1%	18.8%

33. It may be seen that the surge happened in 2015 and 2016. The European Commission noted as follows at para 33 of the Definitive Regulation⁴:

*Imports increased in absolute terms by 71 % during the period of analysis, and in relative terms with market shares increasing from 12,7 % to 18,8 %. **The most significant** increase **took place in the period 2013-2016.** Subsequently, imports continued to increase at a slower pace before picking up again in the MRP, when*

³ Commission implementing Regulation (EU) 2019/159 of 31 January 2019 imposing definitive safeguard measures against imports of certain steel products.

⁴ *Id.*

the US Section 232 measures entered into force. The above-mentioned trend is also confirmed by the vast majority of the questionnaire replies received from producers based in the main exporting countries.

34. In the recently concluded safeguard investigation concerning ferro-alloys (2025)⁵, the European Commission also recognized a surge in imports. The table and graph showing movement of imports considered is shown below:

Year	2019	2020	2021	2022	2023	2024	MRP
Imports of Ferro-alloys in tonnes	1,142,942	1,018,257	1,373,383	1,324,790	1,414,728	1,331,588	1,296,347
<i>Index</i>	100	89	120	116	124	117	113
Import prices CIF+MFN EUR/tonne	1,067	960	1,215	1,927	1,342	1,184	1,174
<i>Index</i>	100	90	114	181	126	111	110
Production in tonnes	616,707	477,006	598,314	415,657	275,573	351,540	309,976
<i>Index</i>	100	77	97	67	45	57	50
Imports over production (ratio)	1.85	2.13	2.30	3.19	5.13	3.79	4.18
<i>Index</i>	100	115	124	172	277	204	226
Consumption in tonnes	1,845,132	1,602,735	2,075,077	1,874,156	1,758,562	1,754,412	1,709,235
<i>Index</i>	100	87	112	102	95	95	93
Imports over consumption (ratio)	0.62	0.64	0.66	0.71	0.80	0.76	0.76
<i>Index</i>	100	103	107	114	130	123	122

35. It may be seen that the sudden significant surge happened in 2021 and thereafter imports remained at a high level. The recent decline in the imports in the end of the POI was considered as insignificant. Extracts from the definitive regulation is provided below:

In the MRP the imports continued to decrease as in 2024, however, imports remained high and higher than a previous historical peak in 2017. 2021 had a higher level of annual imports than 2022 in view of the economic recovery post-COVID-19 leading to historical high consumption. In sum, since 2021, imports

⁵ Commission Implementing Regulation (EU) 2025/2351 of 18 November 2025 imposing a definitive safeguard measure with regard to imports of certain ferro-alloying elements.

remain at elevated levels, with small fluctuations from year to year. The most recent declining trend is not sharp enough to detract from the continuation of an increased level of imports overall. In reply to the comments, the Commission also noted that the legal requirement is not that imports ‘are increasing’ at the moment the determination is made or at the end of the period concerned. Rather, the requirement is that the product ‘is being imported in increased quantities’. Given the levels of imports in the 2021-MRP period, compared to the prior period and that the described fluctuations within the 2021 - MRP period are several times smaller in magnitude than the increase compared to the preceding part of the period concerned.

36. In US-Lamb meat⁶, the Appellate Body noted that Authorities should not only rely on import data in the recent past but view it in the context of how the data trend has been during the entire investigation period.

138. *However, we believe that, although data from the most recent past has special importance, competent authorities should not consider such data in isolation from the data pertaining to the entire period of investigation. The real significance of the short-term trends in the most recent data, evident at the end of the period of investigation, may only emerge when those short-term trends are assessed in the light of the longer-term trends in the data for the whole period of investigation. If the most recent data is evaluated in isolation, the resulting picture of the domestic industry may be quite misleading. For instance, although the most recent data may indicate a decline in the domestic industry, that decline may well be a part of the normal cycle of the domestic industry rather than a precursor to clearly imminent serious injury. Likewise, a recent decline in economic performance could simply indicate that the domestic industry is returning to its normal situation after an unusually favourable period, rather than that the industry is on the verge of a precipitous decline into serious injury. Thus, we believe that, in conducting their evaluation under Article 4.2(a), competent authorities cannot rely exclusively on data from the most recent past, but must assess that data in the context of the data for the entire investigative period.*

37. In Argentina-Safeguard measures on imports on footwear⁷, the Appellate body specifically noted that:

⁶ Appellate Body, United States – Safeguard Measure on Imports of Fresh, chilled or frozen lamb from New Zealand (US-Lamb meat), WT/DS177/AB/R

⁷ Appellate Body, Argentina – Safeguard Measures on Imports of Footwear [Argentina – Footwear (EC)], WT/DS121/AB/R

*The Panel, in footnote 530 to para. 8.166 of the Panel Report, recognizes that the present tense is being used, which it states "would seem to indicate that, whatever the starting-point of an investigation period, it has to end no later than the very recent past." (emphasis added). Here, we disagree with the Panel. **We believe that the relevant investigation period should not only end in the very recent past, the investigation period should be the recent past.***

38. In US-Steel Safeguard⁸, the panel noted that factors that influenced such increase such be examined in totality, to understand such sharp increase in imports.

10.162 As regards the question of how recently the imports must have increased, the Panel notes, as the Panel in US – Line Pipe did⁵⁰²⁴, that Article 2.1 of the Agreement on Safeguards speaks of a product that "is being imported ... in such increased quantities". Thus, imports need not be increasing at the time of the determination; what is necessary is that imports have increased, if the products continue "being imported" in (such) increased quantities. The Panel, therefore, agrees with the US –Line Pipe Panel's view that the fact that the increase in imports must be "recent" does not mean that it must continue up to the period immediately preceding the investigating authority's determination, nor up to the very end of the period of investigation.⁵⁰²⁵ As pointed out by the Panel in US – Line Pipe⁵⁰²⁶, the most recent data must be the focus, but should not be considered in isolation from the data pertaining to the less recent portion of the period of investigation. However, as indicated by the present continuous "are being", there is an implication that imports, in the present, remain at higher (i.e. increased) levels.

10.163 Whether a decrease in imports at the end of the period of investigation, in the individual case, prevents a finding of increased imports in the sense of Article 2.1 of the Agreement on Safeguards will, therefore, depend on whether, despite the later decrease, a previous increase nevertheless results in the product (still) "being imported in (such) increased quantities". In this evaluation, factors that must be taken into account are the duration and the degree of the decrease at the end of the relevant period of investigation, as well as the nature, for instance the sharpness and the extent, of the increase that intervened beforehand.

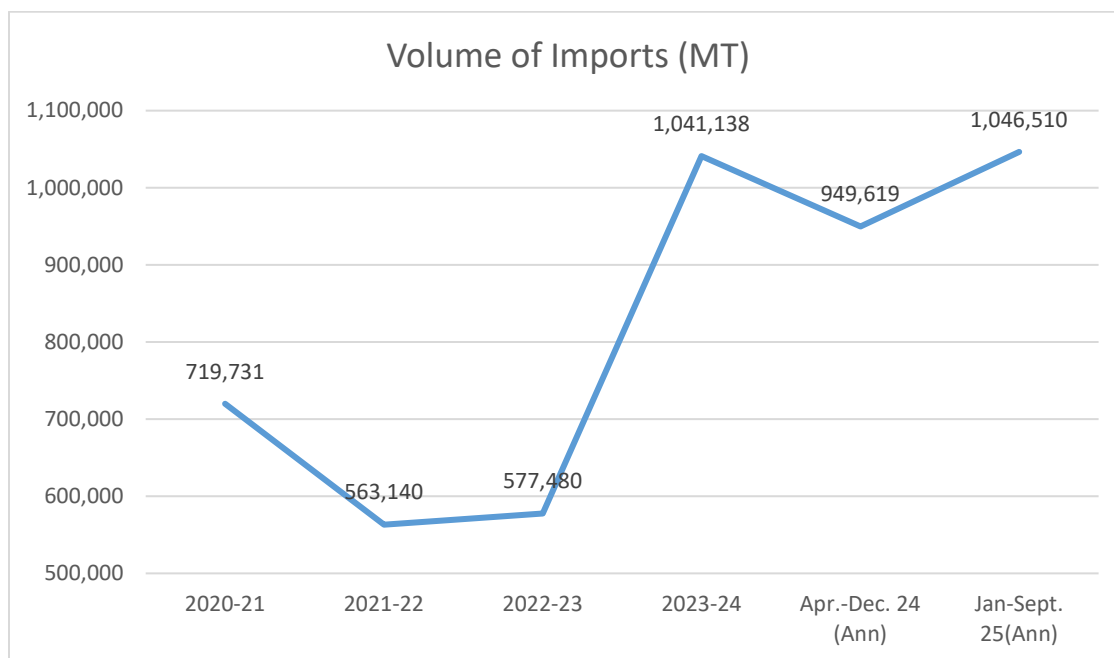
⁸ Panel Report, United States – Definitive Safeguard Measures on Imports of Certain Steel Products (US – Steel Safeguards), WT/DS252.

39. The GATT Analytical Index – Guide to GATT Law and Practice, by WTO, also notes that the Working Party also interpreted the original provision ‘increase in imports’, to mean increase in relative terms.

In discussions concerning Article 40 of the Charter (the Article corresponding to Article XIX) during the Havana Conference, it was agreed to insert the word “relatively” between “such” and “increased”, “so as to make it clear that Article 40 could apply in cases where imports had increased relatively to domestic production, even though there might not have been an absolute increase in imports as compared with a previous base period”.⁶ The Working Party on “Modifications to the General Agreement”, which met directly after the Havana Conference, considered amendment of Article XIX to conform to this wording but decided not to do so, on the basis that “It was also the understanding of the Working Party that the phrase ‘being imported ... in such increased quantities’ in paragraph 1(a) of Article XIX was intended to cover cases where imports may have increased relatively, as made clear in Article 40, paragraph 1(a), of the Havana Charter”.

II. Provide full and detailed information regarding the imports of the said product in terms of quantity and value year wise for the last three years:

40. There has been a dramatic increase in imports over the injury period. Imports which were declining till 2022-23, surged by 45% in 2023-24 from base year levels, and by 80% from 2022-23 level. In December 2024, the Government of India imposed minimum import price (MIP) on imports of subject goods, enclosed as **Annexure 3.1**, effective till 31st December 2025. However, despite imposed minimum import price, subject imports have maintained its surged level even in the POI.



41. The details of imports of the product under consideration over the past three years, in terms of quantity and average price, are set out below. It is evident that while import volumes have increased sharply during this period, the average import price has declined by 30% over the corresponding period.

Particulars	Unit	2020-21	2021-22	2022-23	2023-24	Apr.-Dec.'24 (A)	Jan.-Sept'25 (A)
Volume of imports	MT	7,19,731	5,63,140	5,77,480	10,41,138	9,49,619	10,46,510
Value of imports (CIF price)	₹/MT	15,951	17,225	33,830	24,202	18,811	20,689

**Apr-Dec24 and Jan-Sept 25 figures "annualized" to facilitate direct comparison*

42. The surge in imports is predominantly from countries which are traditional suppliers of Soda ash to India, namely, the USA, Turkey, Iran/UAE and Russia, and recently, China PR. History of trade remedial measures imposed on imports of subject goods from these countries, is enclosed as **Annexure 3.2**.

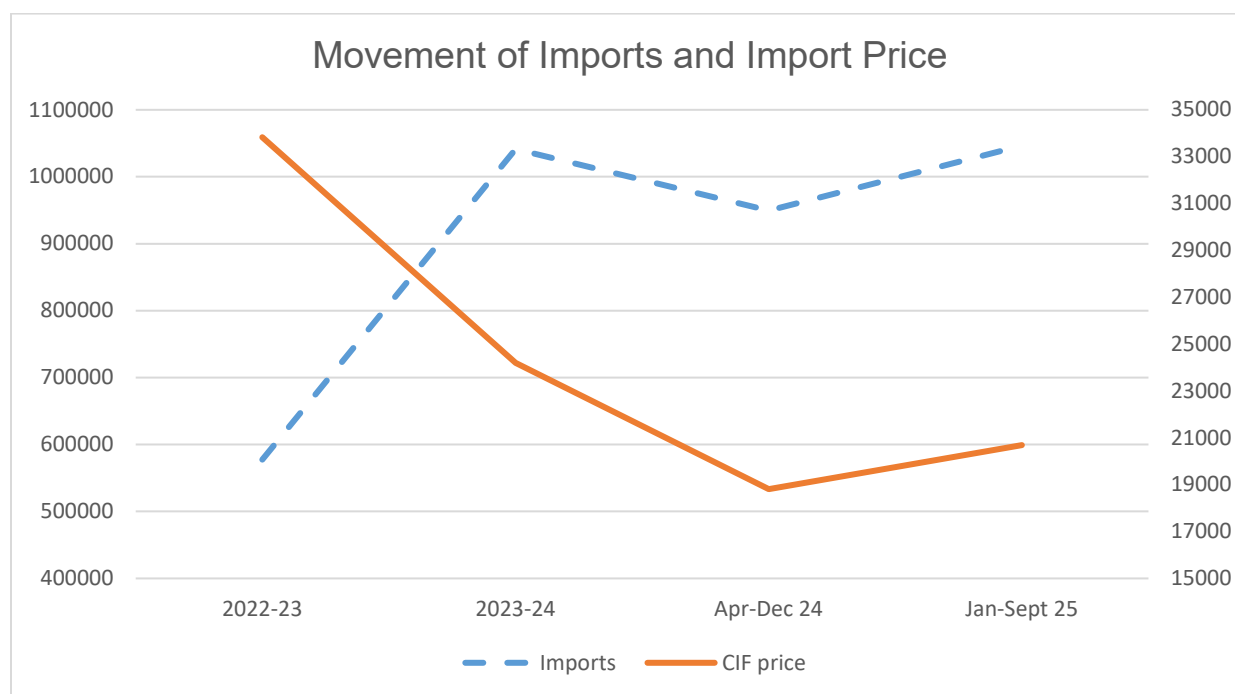
SN	Particulars	UoM	2020-21	2021-22	2022-23	2023-24	Apr.-Dec.'24 (A)	Jan – Sept '25 (A)
1	USA	MT	1,98,121	81,869	88,186	2,09,921	1,64,904	3,85,460
2	Turkey	MT	86,511	1,04,950	1,09,759	3,67,289	3,60,306	2,87,527

3	Iran/UAE	MT	1,25,612	88,839	76,518	91,839	1,46,059	1,60,468
4	Russia	MT	87,836	51,867	21,563	1,34,150	1,52,162	58,593
5	EU	MT	1,11,835	1,14,395	85,996	83,257	49,988	66,083
6	Kenya	MT	83,236	1,16,716	79,605	90,380	63,712	55,620
7	China	MT	14,976	2,319	96,553	50,155	12,155	32,547
8	Other countries	MT	11,604	2,185	19,300	14,147	333	211
9	Total	MT	7,19,731	5,63,140	5,77,480	10,41,138	9,49,619	10,46,510

43. The increase in imports has occurred despite the Indian industry being fully capable of meeting almost the entire domestic demand, making imports to this extent, unnecessary.

b. Decline in import price

44. There has been a steep decline in import price of subject goods in 2023-24. Import prices declined by 28% in 2023-24 as compared to 2022-23. This was followed by a surge in imports in 2023-24.



45. Import price also declined drastically in 2023-24. This decline was much more than the slight decline in cost of production. With decline in import price, imports increased from 5.77 lacs MT in 2022-23 to 10.41 lacs MT in 2023-24.

46. Import price declined further in Apr-Dec., 2024 period. With such steep decline in prices, the domestic industry approached the government to impose minimum import price (MIP). Thus this decline in price in Apr-Dec., 2024 led to imposition of MIP, which became effective from Jan., 2025. Resultantly, the CIF import price shows increase in Jan.-Dec., 2025 period.

Particulars	Unit	2020-21	2021-22	2022-23	2023-24	Apr.- Dec.'24	Jan.- Sept'25
CIF price	₹/MT	15,951	17,225	33,830	24,202	18,811	20,689
	Trend	100	108	212	152	118	130
Imports	MT	7,19,731	5,63,140	5,77,480	10,41,138	9,49,619	10,46,510
	Trend	100	78	80	145	132	145

47. Further, the current prevailing import price is unrepresentative. Data provided hereinabove is based on Indian customs data. It would appear from the data that prices in Jan-Sept 25 period remained more or less in similar region when infact such prices have further declined. This is evident from the export data from these countries, as verifiable from Trademap data. A statement showing export price from major exporting countries, such as China PR, Turkey and USA to India is enclosed as **Annexure 2.7**.

Imports from Turkey					
SN	Month	Volume MT	Rate FOB US\$/MT	Constructed CIF price US\$/MT	Constructed CIF price Rs/MT
1.	Apr-25	36,000	178	208	17,970
2.	Jun-25	33,900	182	212	18,449
3.	Aug-25	35,000	159	189	16,626
4.	Oct-25	26,300	141	171	15,290

Source: Trademap

Export from USA to India					
SN	Month	Volume MT	FOBR Rate	Constructed CIF price	Constructed CIF price
			US\$/MT	US\$/MT	INR/MT
9.	Mar-25	58,960	191	236	20,666
10.	May-25	53,900	180	225	19,323
11.	Jun-25	54,757	178	223	19,409
12.	Jul-25	34,955	167	212	18,387
13.	Sep-25	74,805	185	230	20,386

Source: Trademap

Exports from China to India					
SN	Month	Volume in MT	FOB US\$/MT	Constructed CIF price in US\$/MT	Constructed CIF price in INR/MT
1.	Jan-25	6,315	197	222	19,227
2.	Mar-25	2,609	204	229	20,088
3.	Apr-25	958	215	240	20,781
4.	May-25	3,540	189	214	18,429
5.	Jun-25	2,205	177	202	17,606
6.	Jul-25	7,935	172	197	17,064
7.	Aug-25	16,791	158	183	16,119
8.	Sep-25	914	171	196	17,370
9.	Oct-25	6,695	160	185	16,533

III. Provide break up of (1) above country wise in absolute terms as well as a percentage of the total imports of the said product:

48. A detailed statement of country wise imports is enclosed herewith as **Annexure 2.3**. Further, a detailed statement of exports from major exporting countries to India as per customs data is enclosed (Source – Trademap/exporting country's customs data) as **Annexure 2.7**.

IV. Provide full and detailed information on the share of the imported products and the share of the domestic production of the like product and the directly competitive products in the total domestic consumption for the last three years (or longer) both in terms of quantity and value:

49. Details of imports, demand and share of imports in relation to consumption are contained in **Annexure 6.1(a)**. It would be seen that imports of the product under consideration have increased significantly in relation to the production and consumption in India.

Parameters	Imports in relation to Indian Production	Imports in relation to consumption
Unit	%	%
2020-21	24%	20%
2021-22	16%	14%
2022-23	16%	15%
2023-24	30%	25%

Apr.-Dec.' 24 (A)	26%	22%
Jan-Sept.'25(A)	28%	23%

V. Provide information on factors that may be attributing to increased imports:

49. Following factors are leading to this increase in imports:

a. Decline in global demand while increase in demand in India

50. Major global markets faced significant negative growth in consumption in 2023, except Indian market which registered a positive growth. In fact, Indian market was the only market that witnessed an increase.

SN	Market	Growth (%)
1	Europe	-4%
2	Latin America	-7%
3	US	-10%
4	India	1%
5	Cumulative	-2%

51. The decline in demand globally has led to oversupply of the subject goods, thus forcing exporters to look for attractive markets such as India, where demand is rising and market conditions remain stable.

b. Distortions in global trade and weakening demand in Europe due to the Russia-Ukraine conflict during 2022-23

a. Trade disruption in the EU market

52. The Russia–Ukraine conflict in 2022-23 significantly disrupted traditional trade routes, particularly those linked to Europe. The Black Sea, which serves as a critical maritime corridor connecting the EU, Turkey, and Russia, has been affected by port disruptions, elevated freight and insurance costs, and increased logistical uncertainty since the onset of the conflict.⁹ As a result, exports to the EU, historically a key destination for both Turkish and Russian producers, became increasingly constrained, forcing suppliers to redirect volumes to alternative markets.

⁹ [www.europarl.europa.eu/RegData/etudes/ATAG/2022/733603/EPRS_ATA\(2022\)733603_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/ATAG/2022/733603/EPRS_ATA(2022)733603_EN.pdf)

b. Decline in demand in Europe

53. Persistently high inflation in the eurozone reached a record high of 10.6% in October 2022, far exceeding expectations. High inflation has squeezed household budgets and led to decreased consumer spending, and demand in Europe.

54. Russia accounted for 40% of West/Central Europe's natural gas supply, additionally supplying 81% of global anthracite.¹⁰ The geopolitical conflict significantly increased energy costs in EU. This was corroborated by overall economic slowdown and decline in demand from end user industries, such as glass and automotive industry.¹¹

55. As a result of these factors, demand for soda ash from all end-use sectors in Europe declined. This is evident from the data published in *The Global Soda Ash - Monthly Market Report - Chemical Market Analytics (Market Report)*. The Market reports which had projected higher demand for 2023-2024 in the EU, shows that in actuality, it has declined.

	Projected as per Market report 2023		Actual as per Market report 2024	
	2023	2024	2023	2024
Demand in EU	6394	6,033	6022	5797

56. The projections in demand for 2025 and 2026 have also undergone revision. As per the May 2024 Market Report, the projected demand in Europe for 2025 was 6,126 ('000 MT), which, as per the 2026 Market Report, declined to 5,806 ('000 MT), and the demand now projected for 2026 is 5,889 ('000 MT). Thus, there is an approximate 4% decline in demand in Europe, confirming sustained market contraction. Relevant extracts are enclosed as **Annexure 3.3**.

57. This is also corroborated by the overall decline in imports into the EU in 2023. Imports from Turkey, a significant key exporter, also declined substantially. With declining markets in Europe, Turkish suppliers increased exports to India. Import and export statements from the major supplying countries are enclosed as **Annexure 3.4**.

SN	Particulars	UoM	2021	2022	2023	2024	2025
1	EU including UK	MT	22,79,256	23,52,706	18,06,105	21,11,214	21,98,868
2	India	MT	1,01,725	1,14,481	3,46,761	3,79,234	1,93,742

¹⁰https://www.aigmf.com/docs/99/World%20Soda%20Ash%20Conference%202022_AIGMF_as_Media_Partner_1.pdf

¹¹ <https://www.procurementresource.com/blog/overview-of-soda-ash>

c. Turkey’s own demand decline and its exports to Europe also declined, resulting in increased imports to India

58. Turkey was a regular supplier to Europe. However, exports from Turkey to Europe declined significantly due to weakened demand in Europe, reducing Turkey’s access to its traditional export market.

59. Further, Turkey’s own economy also slowed in 2023 and its GDP growth slowed down.¹² This was due to several factors, including a loss of momentum in supply as industrial production shrank for the second consecutive month in August by 0.8 % month-on-month,¹³ inflation reaching 61.5% in September and a depreciation of the Lira (Turkey’s currency) by 3%.¹⁴

60. Turkey had an existing capacity of approx. 5 million MT.¹⁵ Despite weak domestic demand, Turkish producers expanded capacity. Ciner added 1.6mt/year in two phases, with 600,000t/year capacity added in 2021. WE Soda that owns natural soda ash production in both Turkey and the US, also had expansion plans underway in Turkey and also for significant capacity increases in the US. Thus, Turkish producers had significant surplus that needed to be directed towards markets with growing demand for subject goods.

61. The Applicant has enclosed export statements from the major supplying countries as **Annexure 3.4**. It can be seen that imports into the EU declined significantly in 2023, whereas exports to India increased significantly at significantly reduced prices.

SN	Particulars	UoM	2021	2022	2023	2024	2025
	EU						
1	Volume	MT	1,999,939	2,029,236	1,619,055	2,022,489	2,179,164
2	Price	USD/MT	153	285	316	207	211
	India						
3	Volume	MT	101,725	114,481	346,761	379,234	193,742
4	Price	USD/MT	165	296	217	172	157

¹²<https://www.worldbank.org/en/country/turkey/overview#:~:text=Risks%20also%20remain%20high%2C%20with,help%20accelerate%20sustainable%20economic%20growth.>

¹³ https://www.zawya.com/en/world/china-and-asia-pacific/turkish-industrial-output-fell-08-monthly-in-august-m28191ga?utm_source=chatgpt.com

¹⁴ https://www.reuters.com/world/middle-east/turkish-inflation-rises-6153-september-near-forecast-2023-10-03/?utm_source=chatgpt.com

¹⁵ <https://www.kazansoda.com/en/about-us/>; www.sisecam.com/en/s-investor-relations/MaterialDisclosures/15.01.2024%20Mersin%20Soda%20Ash%20Plant%20Capacity%20Increase.pdf

d. Market scenario of USA resulted in increased exports from USA

62. For US producers, demand in the export market drives more growth than the domestic market, which is mature.¹⁶ The capacity with US was 13.9 million. The largest capacity expansions in the U.S. were undertaken by Genesis Alkali, where a total of about 1.2 million MT of capacity was added in two phases in 2023.

63. U.S. production did not reflect the additional capacity available following the expansion by Genesis at the start of 2023. Historically Mexico has been the largest export destination for US. However, demand in Mexico declined in 2023-24 leading to decline in exports from US to Mexico.

The biggest decline to date was in North America, down 23%, or 148,000 mt, led by Mexico. Container glass, the single biggest soda ash demand sector in Mexico, is weak, on the back of muted demand for alcoholic beverages. Overall soda ash demand in Mexico is not expected to improve until 2025.¹⁷

64. Exports from the US to the world is as follows:

Country	2021	2022	2023	2024	2025(A)
Total/Average	69,03,697	64,92,390	66,47,454	74,02,171	70,65,921
Mexico	15,14,478	15,71,421	13,98,748	12,98,203	12,19,127
India	95,695	66,643	2,24,974	2,12,348	4,17,085

65. According to figures published by the U.S. Geological Survey, in August 2023, soda ash production was 869,000 MT—8% lower than July and 8% lower than August 2022. For the first eight months of 2023, soda ash production was 7.23 million MT, 3% lower than the corresponding period in January–August 2022.¹⁸ This indicates that U.S. producers responded to the global situation of oversupply and weakening demand. In such circumstances, suppliers attempt to sell existing stock in markets that can absorb the same, such as India.

66. Export statement showing exports from USA to various destinations has been enclosed as **Annexure 3.4**. It can be seen that exports from the U.S. to India increased significantly in 2023.

¹⁶ <https://www.glass-international.com/features/a-global-overview-of-the-soda-ash-market>

¹⁷ <https://www.glass-international.com/features/a-global-overview-of-the-soda-ash-market>

¹⁸ <https://www.usgs.gov/centers/national-minerals-information-center/soda-ash-statistics-and-information>

SN	Particulars	UoM	2021	2022	2023	2024	2025
	Export from USA to:						
1	India	MT	95,695	66,643	2,24,974	2,12,348	4,17,085
2	Rest of world	MT	68,08,002	64,25,747	64,22,480	71,89,823	66,48,837

e. Cumulative effect of various factors

67. Table below shows the movement of exports from major suppliers and imports in India:

SN	Particulars	Volume in MT			Price in US\$/MT		
		2022	2023	Change	2022	2023	Change
1	Turkey						
	Decline in exports to Europe	23,52,706	18,06,105	-5,46,602	286	318	32
	Increase in imports in India	1,14,481	3,46,761	2,32,280	296	217	-78
2	Russia						
	Decline in exports to Europe	52,299	119	-52,180	266	748	482
	Increase in imports in India	21,614	1,16,879	95,265	384	299	-85
3	USA						
	Decline in exports to Mexico	15,71,421	13,98,748	-1,72,673	243	276	33
	Increase in imports in India	66,643	2,24,974	1,58,331	330	241	-89

68. The table below shows global imports, and imports into India:

Year	Imports into various countries	Imports in India	Imports excluding India
2021	1,73,35,439	6,09,099	1,67,26,340
2022	1,78,06,024	5,32,704	1,72,73,320
2023	1,65,70,907	9,68,788	1,56,02,119
2024	1,73,52,017	9,20,184	1,64,31,833
2025	1,71,36,375	10,46,509	1,60,89,866

69. It can be seen that:

- a. Global imports declined in 2023. As stated before, a significant part of this was due to decline in imports into EU, resulting in surge of imports into India.
- b. Turkey lost significant volumes in EU. Resultantly, Turkey reduced prices and increased its exports to India.
- c. Global imports increased in 2024. Resultantly, imports in India slightly declined. However, despite the increase in global imports in 2024, the volume was still much lower than the past volumes. Resultantly, the imports in India continued to remain at increased levels.
- d. Global exports declined again in 2025. Resultantly, there was some increase in imports again in India in this period.
- e. Overall, global import levels have remained lower than the past period, despite capacity expansions. This shows that, regardless of capacity expansions, global demand has weakened and surplus volumes have been directed to India.

f. Significant fresh capacities commenced production during the surge period when the demand. Instead of increasing, declined

70. While the soda ash market globally was already hugely surplus, fresh capacities commenced commercial production. Further, while these producers setting up fresh capacities hoped for an increase in demand, reverse happened. Demand declined, thus resulting in significant pressure.

71. The above listed market situations thus show unforeseen development leading to increased imports in India in 2023-24. After the surge registered in 2023-24, imports have remained at that level in subsequent period.

72. Reference is made to India-Certain Measures on imports of iron and steel products (DS518), wherein the panel considered increase in capacity, compounded by decline in demand from traditional importing countries and currency depreciations to amount to unforeseen development. In the present case as well, the evidence shows a similar factual situation, namely, rapid and substantial capacity additions in major producing countries (China, USA, and Turkey), contraction of demand in key markets such as the EU and the US, redirection of surplus volumes to alternative markets, and sustained price depression arising from global oversupply amounting to unforeseen development. Relevant part of the Panel report is reproduced below:

7.96. **In its discussion of unforeseen developments, the Indian competent authority referred to the increase of production capacity in major exporting countries, the increase in demand in India, and the decrease in demand in the European Union, the United States, and China. Even though the changes in production capacity or demand are not necessarily extraordinary circumstances, and can occur as part of normal business cycles, the extent and timing of such changes as well as the degree of their impact on the competitive situation in the market can be unforeseen.**¹⁶¹ The Indian competent authority observed that in 2014 the world production capacity of crude steel was 2,351 million tonnes, which exceeded the global demand by almost 30%.¹⁶² The production capacity further increased significantly in 2015: "effective capacity figure for early 2015 is 1055 million tones [sic] for the non-Chinese industry and 991 million tones [sic] for China, a total of 2.05 billion tones [sic]. When compared to steel production in 2014 of 1.66 billion tones [sic], there is 382 million tones [sic] of excess global steel making capacity".¹⁶³ These data indicate the significant extent and speed of changes in world production capacity of steel. Furthermore, the Indian competent authority found that the increase in production capacity occurred at the same time as other developments in the market. In particular, the European Union and the United States, which were "traditionally the biggest importers of steel", decreased their demand for imported steel. The Indian competent authority also referred to the decrease in the domestic demand in China and noted that China used to have a "sustained growth rate" for many decades, which indicates that the drop in growth rate was unexpected. **Finally, India could not reasonably have expected the currency depreciations in Russia and Ukraine, which happened due to political and economic crises in these countries that were unrelated to the ordinary course of commerce.**

7.97. **In our view, it was reasonable for the Indian competent authority to find that an increase to such extent in production capacity, combined with higher domestic demand in India, decreased demand in several major markets, and that currency depreciation in Russia and Ukraine were unforeseen developments. We consider that negotiators could not reasonably have expected this confluence of events when India negotiated its tariff concessions. In light of the above reasons, we conclude that the Indian competent authority provided reasoned and adequate explanation as to why the identified developments were unforeseen.**

VI. Effects of obligations incurred

73. In terms of Article XIX:1 (a) of GATT 1947 the increase in imports shall be 'of the effect of the obligations incurred by a contracting party under this Agreement, including tariff concessions'. On this aspect, the Appellate Body in *Korea-Dairy* opined: "it must be demonstrated, as a matter of fact, that the importing Member has incurred obligations

under the GATT 1994, including tariff concessions". Secondly, in the report of the Panel in India – Certain Measures on Imports of Iron and Steel Products, it has been observed as follows:

"7.87. A WTO Member imposing a safeguard measure must demonstrate the existence of unforeseen developments and the effect of GATT 1994 obligations through reasoned and adequate explanations contained in its published report. These explanations must show that the identified unforeseen developments have resulted in increased imports causing or threatening to cause serious injury to the relevant domestic industry, and that one or more obligations under the GATT 1994 limit the importing Member's ability to prevent or offset the effect resulting from such increased imports.

7.89. With respect to the effect of a GATT 1994 obligation, the competent authority's published report must demonstrate that a WTO Member imposing a safeguard measure is subject to an obligation (or obligations) under the GATT 1994 and explain how that obligation constrains its ability to react to the import surge causing injury to its domestic industry."

74. India has granted tariff concessions pursuant to Article II of the GATT in its schedule of *concessions*, enclosed as **Annexure 3.5**. Furthermore, several obligations undertaken by India under GATT 1947 and other WTO agreements, have constrained the ability to react to import surge. The following articles under GATT 1947 may be cited as follows:

- a. Article I casts an obligation to grant most favoured nation treatment to every WTO Member restricting India's ability to apply differential rates of customs duty on imports from a WTO Member if import volume from that country has significantly increased causing serious injury.
- b. Article XI casts an obligation prohibiting the use of quotas, import or export licenses, or other measures that restrict the quantity of imports or exports and ensures that trade flows remain as unrestricted as possible.
- c. Article XVI and the SCM Agreement cast obligations to not maintain subsidies.

75. The product concerned was being imported in increased quantities as a result of the above obligations undertaken under the GATT 1994 (Article XI:1, Article II:1(a) and II:1(b), because those obligations, combined with the tariff concessions enhanced and secured the conditions of market access for imports of the subject goods to the Indian market. The above-mentioned tariff commitments thus resulted in the increase in imports.

SECTION IV – DOMESTIC PRODUCTION

I. Details of the like product and directly competitive products produced by the domestic producer. Information similar to II above i.e.

i. Name:

76. The domestic producers are engaged in the production of Disodium Carbonate, popularly known as Soda Ash, that is, like goods to the imported product.

ii. Description:

77. Like goods being produced by the domestic industry is the same as the imported product, i.e. "Soda Ash". The domestic product is comparable to the imported product.

iii. Tariff classification both under the Central Excise Tariff as well as under the Customs Tariff:

78. The customs classification of subject goods under the Customs Tariff Act, 1975 has been provided in Section II, hereinabove. The Tariff Classification as per the Central Excise Tariff Act, 1985 and GST is the same as Customs Tariff.

iv. Details of domestic producer:

79. The details of all domestic producers of subject goods are enclosed with this application. The applicants have provided details of producers of like goods in India.

II. Names and addresses of all known domestic producer and concerned trade associations and user's associations etc.:

80. The details of all the known domestic producers of subject goods are enclosed with this application. Details of producers and consumers associations are enclosed with this application.

III. Details of production accounted for by each of the producer at 2 above:

81. Details of Indian production are enclosed with this application. The applicants account for a major share in Indian production.

IV. Details of total domestic production:

82. Details of Indian production are enclosed with this application. The applicants account for a major share in Indian production.

V. Installed capacity, capacity utilization and fall in capacity utilization etc.:

83. Details of installed capacity and capacity utilisation can be seen in enclosed injury statement. It would be seen that despite expansion in capacity, there is a relative fall in capacity utilization.

Parameters	Unit	2020-21	2021-22	2022-23	2023-24	Apr.-Dec.' 24 (A)	Jan- Sept.'25(A)
Installed Capacity	MT	40,89,200	40,89,200	41,89,200	41,89,200	43,62,500	43,62,500
Production	MT	29,16,407	34,52,880	35,93,153	33,74,669	35,87,576	36,91,985
Capacity utilization	%	71%	84%	86%	81%	82%	85%

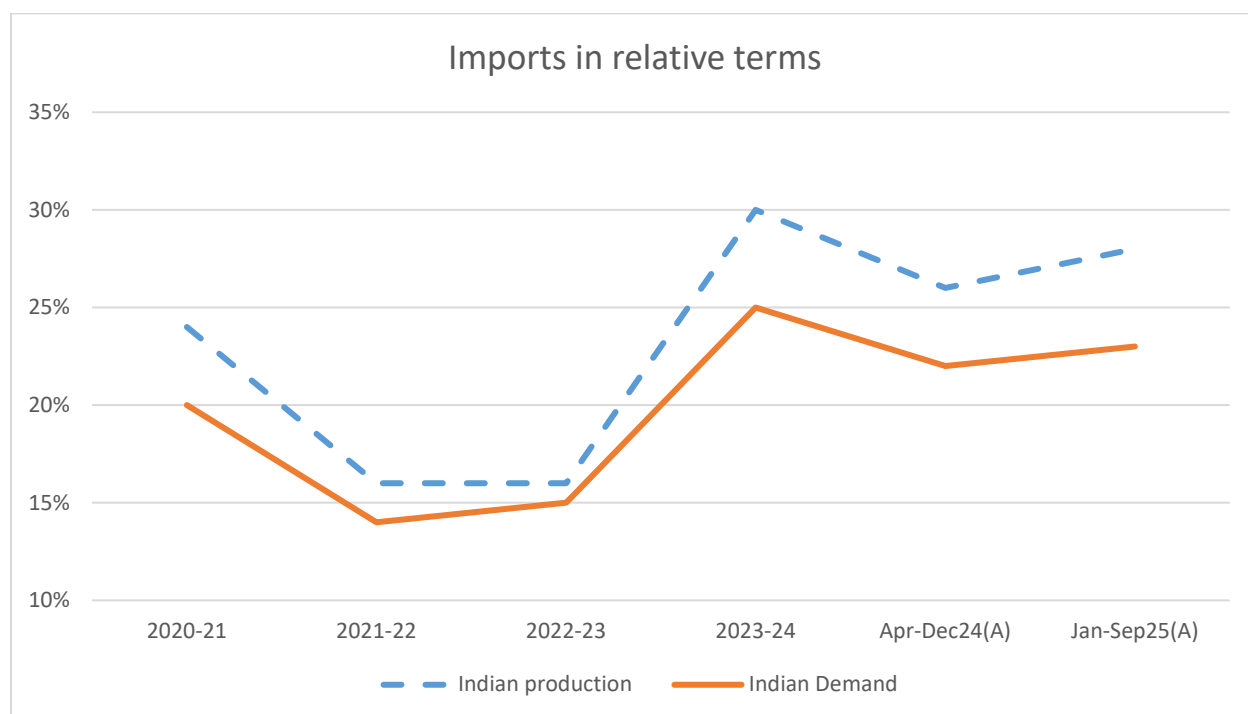
SECTION V – INJURY OR THREAT OF INJURY

I. Impact of increased imports on Domestic Industry: Detailed information on how the increased imports are causing serious injury or threat of serious injury to the domestic industry. This should, inter alia, include information on

a. Increase in imports in absolute and relative terms

84. As has been stated above, import volume has increased in absolute and relative terms over the period of investigation, with a significant surge in 2023-24. Demand has also increased over the same period, however, increase in demand is by 24% whereas imports increased by 45% in 2023-24. This increase in imports is despite expansion in capacity by the domestic industry.

85. Imports of the product in relation to consumption was high in view of Covid in 2020-21 and declined to 15% in 2022-23, in the post COVID period. However, the share of imports increased again to 25% in 2023-24 and remains at similarly high level in the most recent period i.e. 23%. Similarly, imports in relation to production declined from 24% in base year to 16% in 2022-23 and increased significantly thereafter to 30% in 2023-24 and have remained at such a high level thereafter.



b. No demand supply gap in the country to justify surge in imports

86. There is no material demand supply gap in the country to the extent of the surge in imports. Domestic industry can utilise their capacities to the fullest level. Therefore, surge in imports was not necessary to meet the demand. Despite this, imports are increasing at low price taking away the legitimate share of Indian producers. Table below shows information on demand in the country and capacity with the Indian Industry.

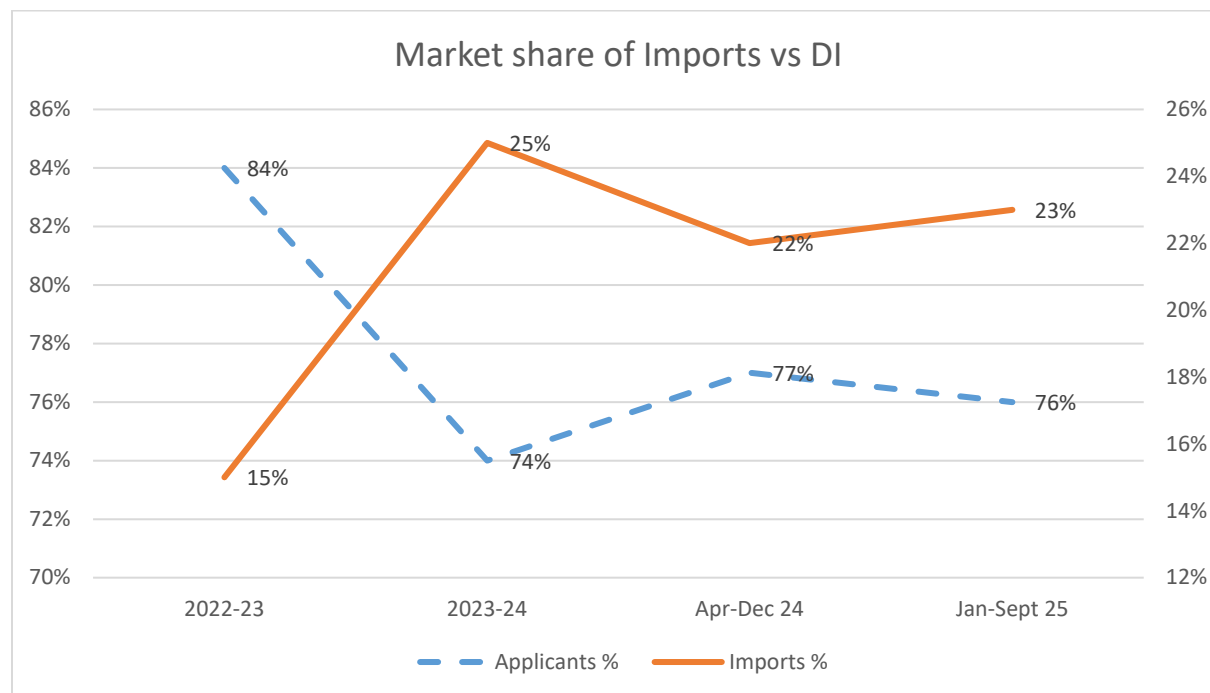
Particulars	2021-22	2022-23	2023-24	Apr-Dec 24(A)	Jan-Sept 25(A)
Capacity					
With the applicant	40,89,200	41,89,200	41,89,200	43,62,500	43,62,500
Indian industry	42,69,200	43,69,200	43,69,200	45,42,500	45,42,500
Demand	38,90,346	39,79,449	41,26,835	43,13,188	45,34,964

i. **Sale volumes, total domestic consumption and how the market share of domestic production has been affected:**

87. Import volumes remained at similar levels or declined slightly till 2022-23. This resulted in increase in the market share of domestic industry with consequent decline in market share of imports. However, with surge in imports in 2023-24, market share of the imports increased significantly with corresponding decrease in market share of the domestic industry. It may be seen that even though the market share of the domestic industry improved slightly thereafter, the same is still much lower than the levels achieved in 2022-23 prior to the surge period.

Parameters	2020-21	2021-22	2022-23	2023-24	Apr-Dec-24 (A)	Jan-Sept. 25 (A)
Share of Imports	20%	14%	15%	25%	22%	23%
Share of domestic industry	80%	84%	84%	73%	77%	76%

88. Furthermore, demand for subject goods increased by 4% in 2023-24 from 2022-23 levels. In contrast, imports in 2023-24, surged by 4,63,658 MT, an increase of 80% over the previous year. Domestic sales, which had marginally declined in 2023-24 from 2022-23 level, increased only by 126,904 MT (4%) in January-September 2025 period, despite significant expansion in capacity. Imports continues to remain at significantly high level. Therefore, clearly the increase in demand of subject goods was absorbed by the surge in imports, notwithstanding the enhanced capacity of the domestic industry.



89. The applicant had also filed an antidumping application seeking imposition of antidumping duties. The Designated Authority recommended imposition of antidumping duties vide Notification dated 29th September 2025. In the said findings the Authority had also noted that the market share has declined. *“The dumped imports have prevented the domestic industry from retaining its legitimate share in the market. The domestic industry lost volumes and market share due to dumped imports and was forced to divert the production to lower profitable export sales.”*

ii. Price undercutting / price depression / prevention of rise in prices. Information on costs of production and how the increased imports have affected the prices of domestic production needs to be provided:

90. There has been a steep decline in landed price post 2023-24. This forced the domestic industry to reduce its selling price significantly. However, the landed price of imports continues to remain even below the reduced selling price of the domestic industry. Therefore, subject imports are undercutting prices of the domestic industry.

Parameters	Unit	2020-21	2021-22	2022-23	2023-24	Apr-Dec24 (A)	Jan-Sep25 (A)
Net selling price	₹/MT	***	***	***	***	***	***
	Index	100	124	196	156	136	129
Landed price	₹/MT	17,267	18,646	36,620	26,199	20,363	22,396
	Index	100	108	212	152	118	130
Price undercutting	₹/MT	***	***	***	***	***	***
	Index	100	781	-435	344	877	111
	%	***	***	***	***	***	***
	Range	0-10	10-20	Negative	0-10	10-20	0-10

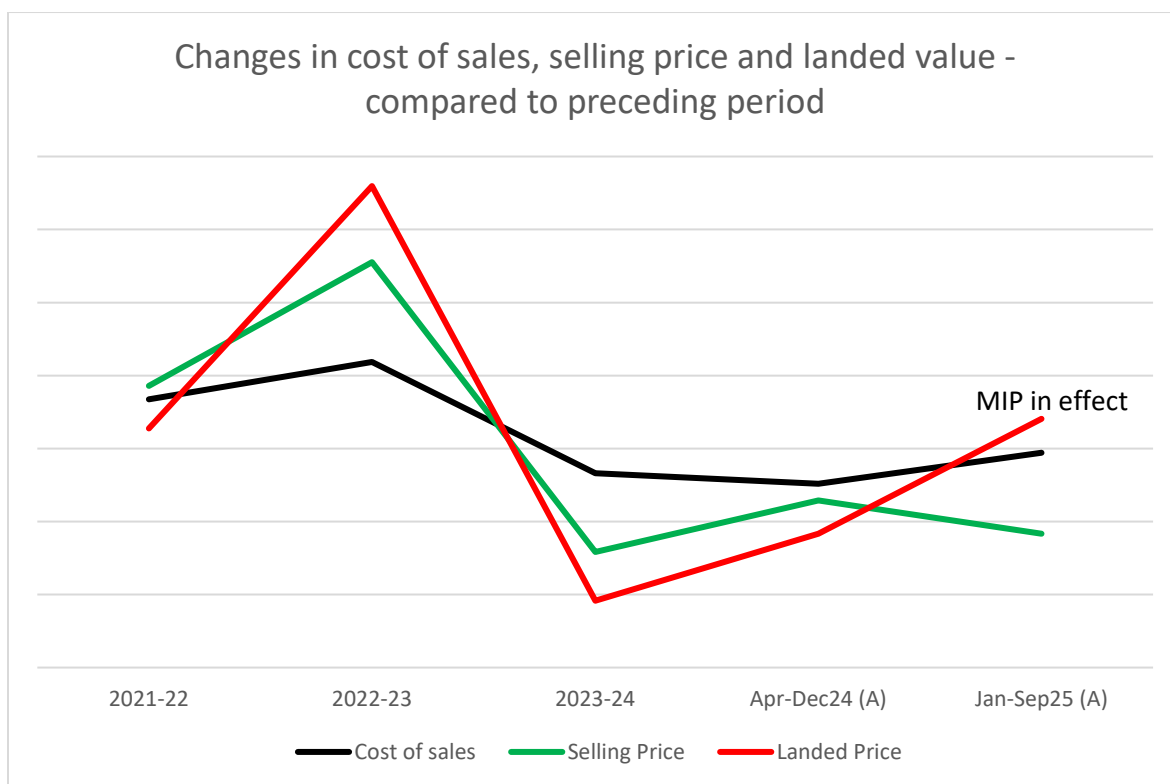
92. Import prices increased till 2022-23 and consequently import volumes declined and the domestic industry was able to increase its prices more than the increase in cost of sales to recover from the past adverse profitability owing to COVID. It would also be seen that the selling price of the domestic industry in 2022-23 were below landed price of imports. Thereafter, the landed price of imports declined drastically leading to price depression. The domestic industry was forced to reduce the prices far beyond the decline in cost of sales. Thus, as imports surged in 2023-24, the domestic industry started facing severe price depression. Continuous decline in prices thereafter forced the domestic industry to reduce the prices beyond cost declines. Individual cost structure for each of the applicant companies, for the entire injury period, can be seen from **Annexure 6.1(b)**.

Parameters	Unit	2020-21	2021-22	2022-23	2023-24	Apr-Dec24 (A)	Jan-Sep25 (A)
Cost of sales	₹/MT	***	***	***	***	***	***
	Trend	100	123	164	152	136	134
Selling Price	₹/MT	***	***	***	***	***	***
	Trend	100	124	196	156	136	129
Landed Price	₹/MT	17,267	18,646	36,620	26,199	20,363	22,396
	Trend	100	108	212	152	118	130

91. From a year-on-year comparison of cost of sales, selling price, and landed value, it may be seen that the change in landed price post 2022-23 is more severe than changes in cost of sales and selling price. It is also important to note that the positive change in landed price in the Jan 25-Sept.25(A) period is unrepresentative of actual import price on account of imposition of minimum import price (MIP) which was effective till 31st December 2025 (as has been explained above).

Changes when compared to preceding period

Parameters	Unit	2020-21	2021-22	2022-23	2023-24	Apr-Dec24 (A)	Jan-Sep25 (A)
Cost of sales	₹/MT	***	***	***	***	***	***
	change	-	***	***	***	***	***
	Index	-	100	176	-50	-72	-8
Selling Price	₹/MT	***	***	***	***	***	***
	change	***	***	***	***	***	***
	Index	-	100	297	-165	-83	-29
Landed Price	₹/MT	17,267	18,646	36,620	26,199	20,363	22,396
	change	-	1,379	17,974	-10,422	-5,836	2,034



92. The Designated Authority had also noted in its final finding that imports have caused significant price depression in the domestic market.

93. The Designated Authority noted in the final findings:

“It is seen that both, cost of sales and selling price increased till the period April 22-Sep 23, and the increase in selling price was more than the increase in cost of sales.

Thus, the prices of the domestic industry were not suppressed or depressed till April 22 – Sept 23. However, while cost of sales and selling price declined in the POI as compared to the preceding period, the decline in selling price was much more than the decline in cost of sales. It is seen that the landed price of imports has also shown the same trend. The domestic industry has thus suffered significant depressing effect on its prices in the POI. Subject imports are causing significant price depression in the domestic market.”

iii. Any significant idling of production facilities in the industry including data indicating plant closure or fall in normal production capacity utilization:

94. While the plants of the Indian industry have not closed, however, there has been excessive pricing pressure on the domestic industry. The domestic industry is prevented from maximizing its capacity utilization and capturing the increase in domestic demand.

iv. Loss of employment & productivity:

g. 97. Employment has not been impacted in the recent surge period due to increase in imports, because of the labour laws in the Country. The labour laws in the Country does not permit such layoffs, nor can the domestic industry survive and continue operations with a policy of hire and fire of employees. Productivity per day declined in 2023-24 but improved thereafter alongwith increase in employment level.

Particulars	Unit	2020-21	2021-22	2022-23	2023-24	Apr-Dec 24(A)	Jan-Sep 25(A)
Production	MT	29,16,407	34,52,880	35,93,153	33,74,669	35,87,576	36,91,985
No of Employees	Nos.	4,596	4,638	4,467	4,461	4,830	4,913
Productivity per day	MT	8,333	9,865	10,266	9,642	10,250	10,549
Productivity per employee	MT	635	745	804	757	743	752

v. Financial situation - Full information on the financial situation of the domestic industry including information on decline in sales, growing inventory, downward trend in production, profits, productivity or increasing unemployment needs to be provided:

a. Sales:

95. The capacities of the domestic industry first increased in 2022-23 and thereafter in the most recent period. There was no surge in imports till 2022-23 and production of domestic industry increased alongwith increase in demand. However, with surge in imports in 2023-24, the domestic industry lost domestic sales, and resultantly, production and capacity utilization.

Parameters	Unit	2020-21	2021-22	2022-23	2023-24	Apr.-Dec.' 24 (A)	Jan- Sept.'25(A)
Installed Capacity	MT	40,89,200	40,89,200	41,89,200	41,89,200	43,62,500	43,62,500
Production	MT	29,16,407	34,52,880	35,93,153	33,74,669	35,87,576	36,91,985
Capacity utilization	%	71%	84%	86%	81%	82%	85%
Domestic sales	MT	23,64,267	27,44,305	28,36,651	25,38,567	28,19,658	29,46,562
Captive Transfer	MT	***	***	***	***	***	***
	Trend	100	103	97	93	93	92
Export Sales	MT	1,66,753	2,35,368	1,73,987	3,69,216	3,20,868	1,61,448

96. The Government of India introduced MIP in the most recent period. Despite the same, imports still showed increase. However, such increase remained limited, and the domestic industry was able to increase its sales further because of increase in demand and domestic industry's efforts to sell at low price. The market share of the domestic industry has, however, still remained below the levels registered in the past and the domestic industry was unable to further optimize its production. Considering the optimum capacity utilization achieved by one of the applicant company, the domestic industry would have sold around 57.99 lacs MT (i.e., around 5.80 lacs MT) more material in the MRP. Evidently, the injury suffered by the domestic industry in 2023-24 (when surge occurred) has continued thereafter till most recent period.

Particulars	UOM	2020-21	2021-22	2022-23	2023-24	Apr-Dec 24	Jan-Sept 25
Import volumes	MT	7,19,731	5,63,140	5,77,480	10,41,138	9,49,619	10,46,510
Capacity	MT	40,89,200	40,89,200	41,89,200	41,89,200	43,62,500	43,62,500
Production	MT	29,16,407	34,52,880	35,93,153	33,74,669	35,87,576	36,91,985
Capacity Utilisation	%	71%	84%	86%	81%	82%	85%
Domestic Sales	MT	***	***	***	***	***	***

(including captive)							
	Trend	100	114	116	105	114	119
Demand	MT	36,31,686	38,90,346	39,79,449	41,26,835	43,13,188	45,34,964
Selling price of DI	Rs/MT	***	***	***	***	***	***
	Trend	100	124	196	156	136	129
Market share of DI	%	80%	84%	84%	73%	77%	76%

b. Production and productivity:

97. Domestic industry added capacities, first in 2022-23 and then in the most recent period. Alongwith the first increase in capacity in 2022-23 and increase in demand, capacity utilization, production and sales also increased. However, since 2023-24 with increase in imports, capacity utilization and consequently, production and domestic sales also declined. Increase in production and sales thereafter was achieved at the cost of significant price reductions, adversely affecting domestic industry's financial parameters.

98. Furthermore, the domestic industry can utilise their capacities to the fullest level. As can be seen from capacity utilization of some of the applicant companies, domestic industry could have utilised its capacities further in tandem with increase in demand for the product in the Country, had imports of the product not been so high. Therefore, despite sufficient demand in the country, capacity of the domestic industry could not be utilised to the optimum level.

Parameters	Unit	2020-21	2021-22	2022-23	2023-24	Apr.-Dec.' 24 (A)	Jan- Sept.'25(A)
Installed Capacity	MT	40,89,200	40,89,200	41,89,200	41,89,200	43,62,500	43,62,500
Production	MT	29,16,407	34,52,880	35,93,153	33,74,669	35,87,576	36,91,985
Capacity utilization	%	71%	84%	86%	81%	82%	85%

c. Inventory:

99. Average inventory has increased significantly with surge in imports and have been increasing thereafter. Inventory levels were high in 2020-21, due to ill effects of COVID. As imports declined till 2022-23, the domestic industry was able to reduce its inventories

levels. However, with surge in imports, the domestic industry was faced with increased stocks, which are increasing thereafter.

Particulars	Unit	2020-21	2021-22	2022-23	2023-24	Apr.-Dec.' 24 (A)	Jan- Sept.'25(A)
Opening Inventory	MT	2,60,972	1,55,080	1,01,802	2,20,499	2,08,649	1,77,090
Closing Inventory	MT	1,55,080	1,01,801	2,20,500	2,11,539	1,77,090	2,42,848
Average Inventory	MT	2,08,026	1,28,441	1,61,151	2,16,019	1,92,869	2,09,969



d. Profitability:

100. Profitability of domestic industry declined significantly with increase in imports in 2023-24 and decline in import prices. Prior to this, profits, cash profits and, profit before interest of domestic industry was recovering from 2020-21 levels, which were low due to COVID.

Parameters	Profit/Loss (PBT)	Cash Profit	PBIT
Unit	₹ /MT	₹ /MT	₹ /MT
2017-18	***	***	***
Trend	100	100	100
2018-19	***	***	***
Trend	115	115	114
2019-20	***	**	**
Trend	105	115	124
2020-21	***	***	***
Trend	60	68	70
2021-22	***	***	***
Trend	78	84	84
2022-23	***	***	***
Trend	210	208	205
2023-24	***	***	***
Trend	106	115	107
Apr-Dec 24(A)	***	***	***
Trend	83	95	84
Jan-Sep 25(A)	***	***	***
Trend	65	82	65

101. With decline in imports and increase in import price, the domestic industry was able to increase its selling price beyond the cost increases till 2022-23. These price increases were necessary in order to recover from low level of profitability suffered during COVID period. Despite these price increases, the selling price of the domestic industry was lower than the landed price of imports in 2022-23. Resultantly, the profitability of the domestic industry improved till 2022-23.

102. With steep decline in prices in 2023-24 and resultant surge in imports, the domestic industry was forced to reduce its prices far beyond the decline in the cost of sales. Resultantly, the profitability of the domestic industry declined steeply in 2023-24, the year when surge in imports occurred.

103. Since the foreign producers continued to reduce the prices and the volume of imports continued to remain at increased levels, the domestic industry was forced to further reduce the prices more than the cost declines. Resultantly, the profitability of the domestic industry has continued to decline till most recent period.

Particulars	CIF import price	Cost of goods sold	Selling price	Profit (Loss)
UOM	₹/MT	₹/MT	₹/MT	₹/MT
2020-21	***	***	***	***
Trend	100	100	100	100
2021-22	***	***	***	***
Trend	108	123	124	130
2022-23	***	***	***	***
Trend	212	164	196	352
2023-24	***	***	***	***
Trend	152	152	156	177
Apr-Dec24(A)	***	***	***	***
Trend	118	136	136	140
Jan-Sep25(A)	***	***	***	***
Trend	130	134	129	108

104. As a result of significant price depression suffered by the domestic industry leading to significant decline in profitability, the profit before interest, cash flow per unit of sales and return on investments declined continuously from 2023-24, the year when surge in imports occurred.

105. As regards return on investment, it may also be noted that all major capacities set up by the domestic industry is largely depreciated. ROI on a new investment/ plant would be very low.

Particulars	PBIT	Cash Profit	PBDIT	ROI
UOM	₹/MT	₹/MT	₹/MT	%
2020-21	***	***	***	***
Trend	100	100	100	100
2021-22	***	***	***	***
Trend	120	125	117	113
2022-23	***	***	***	***
Trend	292	307	265	251
2023-24	***	***	***	***
Trend	152	170	150	119
Apr24-Dec24	***	***	***	***

Trend	120	141	124	93
Jan25-Sep25	***	***	***	***
Trend	93	121	106	71

II. Other Factors of Injury: Provide details of any other factors that may be attributing to the injury to the domestic industry and an explanation that injury caused by these other factors is not attributed to injury caused by increased imports.

106. Injury to the domestic industry is not due to any other factors as can be seen from the following.

a. Contraction in demand

107. The demand for the product has increased in India. Therefore, injury is not on account of contraction of demand.

b. Change in technology

108. There has been no change in technology for production of subject goods, which could have caused injury to the domestic industry.

c. Conditions of competition and trade restrictive practices

109. There are no trade restrictive practices or conditions of competition, which could have caused injury to the domestic industry.

d. Changes in the pattern of consumption

110. There has been no change in pattern of consumption which could have led to injury to the domestic industry.

e. Productivity

111. The productivity of the domestic industry has not declined.

f. Export performance of the domestic industry

112. The injury data provided above relates solely to the domestic operations of the domestic industry and the effect of export performance has been segregated.

g. Performance of other products of the company

113. The injury information provided relates solely to the performance of product under consideration. Therefore, the injury claimed is not attributable to the performance of other products.

114. The Authority in its final findings had noted that domestic industry is suffering material injury due to increased imports of subject goods into India and there exists a causal relationship between the material injury suffered and dumped imports.

SECTION VI – CAUSES OF INJURY

I. Please provide an analysis of data presented above bringing out a nexus between the increased imports, either actual or relative to domestic production, and the injury or threat of injury caused to the domestic industry and the basis for a request for initiation of safeguards investigation under Safeguard Measures (Quantitative Restrictions) Rules, 2012.

115. The increase in imports has caused serious injury to the domestic industry. As discussed in section IV hereinabove, economic health of domestic industry has deteriorated significantly. Please consider the following:

I. Decline in market share of domestic industry

116. Market share of domestic industry was at its highest in 2022-23, however, with increase in imports from 2023-24 onwards, domestic industry's market share has receded while share of subject imports have increased and remained at similar high levels. Further, subject imports have captured the increase in domestic demand post 2022-23, while domestic industry even with increased capacity could not increase its sales commensurately.

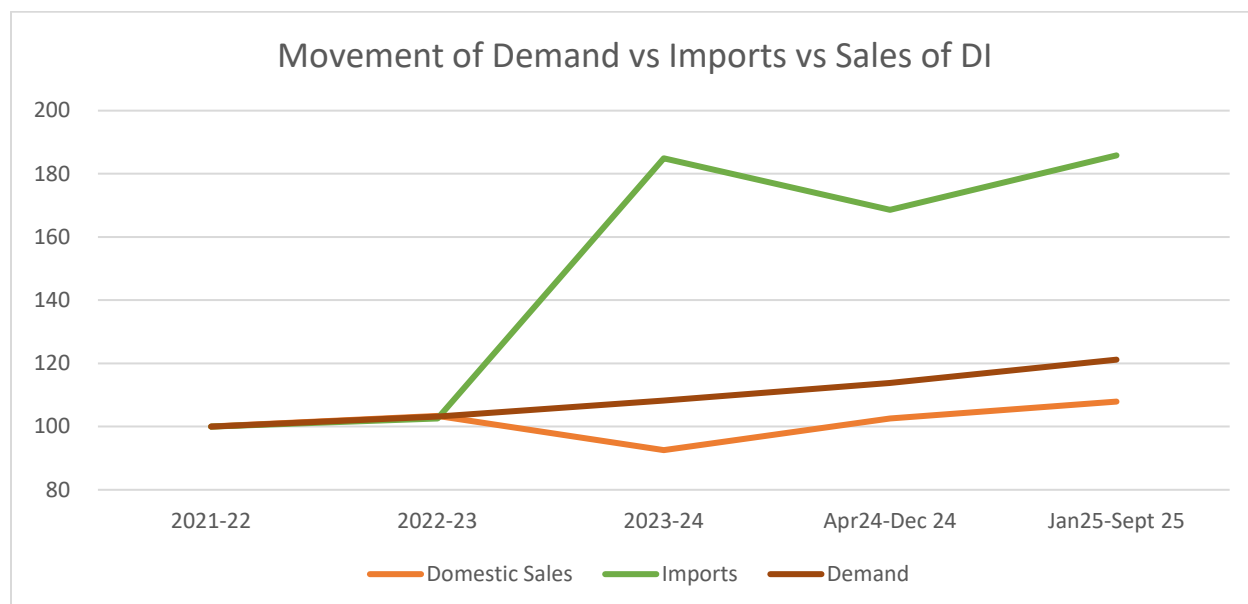
II. Significant rise in inventories

117. Despite expansion in capacity and demand, domestic industry has not been able to sell its produced volume, leading to significant rise in inventories following surge in imports.

III. No material demand-supply gap

118. There is no material demand-supply gap in India for subject goods as Indian industry has sufficient capacity to cater to the entirety of demand. Despite this, domestic industry is not able to increase its domestic sales to the extent of increase in its capacity and overall demand, as imports have increased at a much higher rate than increase in demand.

119. The graph below shows that imports have increased much more than the domestic sales. Further, increase in imports has far exceeded the increase in demand, thus taking away the legitimate market share of the domestic industry.



IV. Decline in imports price forced domestic industry to reduce selling price

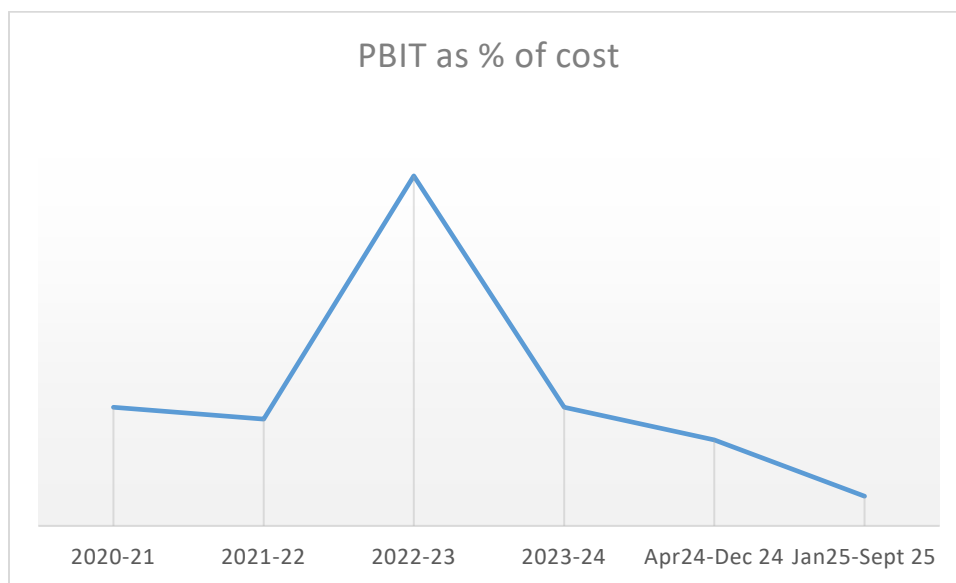
120. As import prices increased till 2022-23, import volumes declined and the domestic industry was able to increase its prices more than the increase in cost of sales. However, post 2022-23, the landed price of imports has declined drastically. Decline in import price was more than the decline in costs, forcing the domestic industry to reduce its selling price beyond the decline in the cost of sales, leading to price depression.

V. Impact on profitability of the domestic industry

121. As a result of the decline in import prices highlighted above, the domestic industry has suffered a decline in its profitability. While the domestic industry earned profits in 2022-23, wherein market share of domestic industry was 84%, its profitability, cash profits and return on investment have dramatically declined, with increase in imports at low price. This is also evidenced by the decline in landed value and resultant surge in market share of imports post 2022-23 as well.

VI. Profit as a percentage of cost

122. If a comparison of profit versus the cost of the domestic industry is drawn, the same would show that during 2020-21, the domestic industry earned ***% profit as a percentage of cost of sales. This increased to its maximum value at ***% in 2022-23, post which has declined to ***% which is even lower than base year level, during the surge period.



Particulars	2020-21	2021-22	2022-23	2023-24	Apr24-Dec 24	Jan25-Sept 25
PBIT	***	***	***	***	***	***
Trend	100	120	292	152	120	108
Cost of sales	***	***	***	***	***	***
Trend	100	123	164	152	136	134
PBIT as % of cost	***	***	***	***	***	***
Trend	100	98	179	100	89	70

SECTION VII – SUBMISSIONS

I. A statement describing the measure requested including:

i. Nature and quantum of quantitative restrictions requested:

123. The applicants are seeking quantitative restrictions on imports of the product under consideration. The applicants request that the restrictions may be imposed based on the volume of imports in the three years covered in the present application, i.e., average imports during the period April, 2020 – March, 2023. Further, applicants request exclusion of imports during the surge period, i.e., imports during April, 2023 – Sept., 2025.

Legal Framework Governing Determination of Quota

124. Article 5.1 of the Agreement on Safeguards provides that a Member shall apply safeguard measures only to the extent necessary to prevent or remedy serious injury and to facilitate adjustment. Where a quantitative restriction is applied, the quantity of imports shall not be reduced below the level of a recent period, which shall be the average of imports in the last three representative years for which statistics are available, unless clear justification is provided that a different level is necessary to prevent or remedy serious injury.

125. Rule 9(1)(ii) of the Safeguard Measures (Quantitative Restriction) Rules, 2012 mirrors the above provision and mandates that the extent of quantitative restriction shall be determined based on the average of imports in the last three representative years, subject to justification for any deviation.

126. It is therefore clear that the law establishes the three-year representative average as the benchmark for determining the level of quota, while itself permitting reasoned adjustments where warranted.

Period for determination of Quota need not coincide with surge period

127. The Agreement on Safeguards does not require that the period used to establish increased imports or injury must be identical to the period used to determine the level of quota.

128. WTO Panel report on EC Steel safeguard case clarified that the period for determining increased imports and the period for fixing the quota level need not be the

same and need not share identical end-points. The requirement under Article 5.1 is limited to ensuring that the quota is not reduced below a recent representative period, unless duly justified. Relevant part is reproduced below:

*We first note that nothing in Article 5.1 of Agreement on Safeguards requires the period during which the Member concerned finds an increase in imports that causes or threatens to cause serious injury to be identical to the period that the Member uses to establish the level of a safeguard, or for the two periods to have the same end-points. In fact, Article 5.1 and its context establish that the Agreement on Safeguards does not require the two periods to be identical. We note, for example, that the second sentence of Article 5.1 generally requires that the level of a safeguard that takes the form of a quantitative restriction be set on the basis of data for "the last three representative years for which statistics are available". By comparison, Article 4 of the Agreement on Safeguards, which concerns the determination of serious injury or the threat thereof, does not prescribe a default length of the POI for the injury analysis. **Thus, even though the second sentence of Article 5.1 is limited to quantitative restrictions, the comparison between Articles 4 and 5.1 illustrates that the Agreement on Safeguards does not require that the time periods that are used for setting the level of the safeguard be the same as the period that is used for the injury analysis.***

129. Accordingly, the period of surge, from April 2023 to Sept 2025, is not required to be included while determining the representative three-year average for quota fixation.

Surge Period is not a representative period

130. Surge periods are, by their very nature, characterized by abnormal or extraordinary market conditions, including sharp increases in imports.

131. Inclusion of the surge period in the computation of the representative average would distort the benchmark and defeat the remedial purpose of safeguard measures, which is to prevent or remedy serious injury and facilitate adjustment of the domestic industry.

132. Therefore, the three representative years immediately preceding the surge period, i.e. April, 2020 – March, 2023, constitute the most appropriate and legally consistent "recent period" for the purpose of determining the baseline quota.

133. DGTR practice in previous safeguard investigations demonstrates that the Authority has adopted an approach of:

(a) determining the base quota on the basis of the average of three representative pre-surge years; and

(b) adjusting the quota to account for increase in demand, demand-supply considerations, and capacity utilisation of the domestic industry.

134. Relevant extracts from past DGTR case is reproduced below to evidence the same.

a. DGTR Practise- Metcoke¹⁹

*The imports of the product under consideration are regulated and permitted not beyond the levels as mentioned in the table below. This quantum has been derived in terms of Rule 9(1) of the Safeguard Measures (Quantitative Restriction) Rules, **based on an average of imports in the three representative years during the period of investigation, that is, 2019-20, 2020-21 and 2021-22 without considering the surge period, that is, 2022-23.** However, the quota has been adjusted and increased in line with the increase in demand and highest capacity utilization of the domestic industry during the period prior to the surge period recommended in the table below are after keeping in view the demand-supply, demand growth and the capacity utilization of the domestic industry.*

b. DGTR Practise- PVC Paste Resin²⁰

*The Authorised Officer has determined the quota by taking an average of import volume of the **PUC in India for three years preceding the most recent period.** The figure arrived has been apportioned on a quarterly basis by considering the growth of demand over the period.*

Consideration of Growth in Demand

135. The baseline quota should be determined on the basis of the average imports in the three representative years prior to the surge. Further, the Agreement on Safeguards permits deviation from this level where clear justification exists.

136. In the present case since surge in imports started in 2023-24, the imports for the period from 2023-24 upto sept 2025 should be excluded to determine the quantum of quota, particularly when the Indian capacities are sufficient to meet the entire available Indian demand. Thus, the applicant proposes consideration of the imports during the period 2020-21, 2021-22 and 2022-23 as the representative period to calculate average imports for determination of quota. Further, even though the Indian capacity is sufficient

¹⁹ Page 70, Final Findings dated 29th April 2024, Safeguard (Quantitative Restrictions) investigation concerning imports of Low Ash Metallurgical Coke into India.

²⁰ Page 38, Final Findings dated 15th May 2023, Safeguard investigation concerning imports of polyvinyl chloride (PVC) Suspension Resins with Residual Vinyl Chloride Monomer (RVCM) content above 2 PPM into India.

to cater the remaining demand in the country, the Authority may also consider addition in the rate of increase in demand in the quota level from 2022-23 to Oct-Sept 2025, to ensure that the measure is not more restrictive than necessary.

137. Table below may be seen for the proposed Quota:

Particulars	UOM	2020-21	2021-22	2022-23	Average
Total Imports	MT	7,19,731	5,63,140	5,77,480	6,20,117
Demand	MT	36,31,686	38,90,346	39,79,449	38,33,827

Increase in Demand	UOM	Average demand in three representative years	Jan-Sept 25 (MRP)
	MT	38,33,827	45,34,964
Rate of increase in Demand	%		18%

Particulars	UOM	
Average Imports of 2020-21, 2021-22 and 2022-23	MT	6,20,117
Volume based on increase in the rate of demand	MT	113,408
Proposed Quota	MT	7,33,525

PUBLIC INTEREST

138. Article 3.1 of the Agreement on Safeguards states as follows:

“A Member may apply a safeguard measure only following an investigation by the competent authorities of that Member pursuant to procedures previously established and made public in consonance with Article X of GATT 1994. This investigation shall include reasonable public notice to all interested parties and public hearings or other appropriate means in which importers, exporters and other interested parties could present evidence and their views, including the opportunity to respond to the presentations of other parties and to submit their views, inter alia, as to whether or not the application of a safeguard measure would be in the public interest. The competent authorities shall publish a report setting forth their findings and reasoned conclusions reached on all pertinent issues of fact and law.”

139. Though Article 3.1 does not provide any guidance on the manner of evaluation, the same, however, requires, *inter alia*, evaluation of impact of measures on various

stakeholders, and taking a balanced view keeping in view competing interests of different interested parties. Thus, Safeguard Measures (Quantitative Restrictions) Rules, 2012 provides as follows:

The Authorised Officer shall provide opportunity to the industrial user of the goods under investigation and to representative consumer, organisations in cases where the goods is commonly sold at retail level to furnish information which is relevant to the investigation including inter alia, their views if imposition of safeguard quantitative restrictions is in public.

140. Public interest must be seen in light of the interests of the producers, consumers and public at large. Imposing safeguard measures in the form of quantitative restrictions would be in the interest of Indian Industry, as it would prevent serious injury being caused by increased imports without materially impacting the interests of the consumers and public at large.

141. The domestic manufacturers are presently suffering injury on account of increased imports entering the Indian market at unfairly low prices. These imports have eroded the market share of the domestic industry, suppressed prices, and adversely impacted key performance indicators such as capacity utilisation, profitability, cash flows and return on investment. Imposition of measures would prevent further injury to the domestic industry.

142. Since the present investigation is for imposition of Quantitative Restrictions and not safeguard duties, the cost and price of the downstream product will not be impacted. There is no demand - supply gap in the present case. The Indian industry has sufficient installed capacity comparable to Indian demand. Despite this adequate capacity, imports continue to command a significant share of total Indian consumption. Therefore, there will be no shortage of the subject goods.

143. The survival of the domestic industry is in the interest of the public at large. The domestic industry has contributed significantly to employment generation. The industry generates direct and indirect employment for 22,000 persons in India of which Gujarat being a key manufacturer, employs majority of them.

144. The table below gives broad consumption profile of soda ash in the country. It would be seen that majority of the soda ash consumption is in detergents and glass. In fact, silicate forms a small portion of soda ash consumption.

Product	Consumption in India
Soaps & Detergents / STPPs	37%
Flat Glass	13%
Container Glass	12%
Solar Glass	2%
Other Glass	6%
Sodium Silicate	13%
Sodium Bicarbonate	5%
Sodium Dichromate	1%
Others	11%

145. Imposition of quantitative restrictions would not have a significant impact on the costs of the downstream users. The majority of consumers of the product under consideration belong to the detergent and glass industries. The cost of subject goods in the total cost of downstream product would have negligible effect. Further, Indian Glass Industry is already protected, by ADD/CVD imposed on the various types of glass. A statement showing various ADD/CVD imposed on the various types of glass is enclosed as **Annexure 7.1**.

146. Some of the applicant companies are also the producers of detergent. It is known that the detergent prices are not directly following the movement of soda ash prices in the country.

147. The product has a history of anti-dumping duties and in none of the investigations, did the downstream industry show adverse impact of any measure on the subject goods. The Authority held in the final findings dated 29.09.2025, that imposition of measures is in public interest.

The domestic industry submitted, despite previous duties, there is no evidence of adverse impact on end consumers, and the domestic industry has demonstrated growth, expanding capacity from 2 million MT in 1998–99 to 4.5 million MT in 2023–24, with further investments planned. These measures are essential to prevent India's over-dependence on imports, particularly when dumped goods are priced below domestic cost of sales, causing material injury. A strong domestic industry not only supports efficient inventory management for consumers but also contributes to employment generation, with over 22,000 direct and indirect jobs.

ii. Purpose of seeking the relief and how such objective will be achieved.

148. The purpose is to restrict the volume of imports of product under consideration so that all parties can survive in the market. Once the volume is regulated, all other parties shall have a fair market competition and would be able to continue operations.

iii. Duration for which imposition of safeguard quantitative restrictions is requested and the reasons therefore:

149. The applicants request the Authority to recommend safeguard measures for four years.

II. If the safeguard measures are requested to be imposed for more than one year, details on efforts being taken and planned to be taken or both to make a positive adjustment to import competition with details of progressive liberalization adequate to facilitate positive adjustment of the industry.

150. The domestic industry is planning to undertake the following measures/steps towards positive adjustment:

a) Nirma Limited

- i. Use of coke briquettes instead of metallurgical coke – Nirma proposes to set up a coke briquette plant at its existing facility in Bhavnagar in 2027, which is likely to result in savings of approximately Rs. 500–750 per metric ton.
- ii. Use of solar energy instead of thermal energy – Nirma has already planned a contract for 20 Megawatt of solar energy, which is scheduled to be commissioned in 2026 and is likely to lead to a saving of Rs. 300/400 per metric ton.
- iii. Nirma has started use of local limestone instead of imported limestone at the Bhavnagar plant, which is likely to lead to some cost advantage.
- iv. As safeguard restrictions are imposed, the applicant would be able to increase capacity utilisation. With increase in capacity utilisation, there will be cost reduction of Rs 500-750 per metric ton.

b) GHCL Limited

- I. Improvements regarding limestone consumption:

- i. *A change in material size would enable* more effective utilization of limestone and directly reduce undersize generation.
 - ii. Modification of the current layout to eliminate multiple transfer points, streamlining limestone handling and minimizing waste.
 - iii. Enhancing lime kiln performance which would result in improved specific consumption norms.
 - iv. Increase usage of local limestone which will boost margins through cost-effective local sourcing.
 - v. Integrating briquettes with imported limestone (previously used only with local limestone), would allow effective utilization of anthracite waste.
- II. On fuel and energy efficiency gains:
- i. Lower limekiln fuel consumption by reducing heat losses.
 - ii. Achieving steam savings through moisture reduction and efficiency improvements.
- III. Process and emission enhancements:
- i. Implement process improvements to increase CO₂ concentration, thereby enhancing overall efficiency.
 - ii. Optimize lime dosing controls to minimise ammonia loss.
- IV. Collectively, these efforts are projected to yield overall savings of approximately 8–9%.
- c) RSPL Limited
- I. Operational improvements:
- i. Stage wise expansion is planned to increase the existing capacity from 1,500 MT to 2,250 MT in stage 1. This will result in reduction in fixed cost, considering, increase in operational cost will not be directly proportional to the increased capacity and investment.
 - ii. Considering salt is one of the major raw materials for which price and supply deviates based on season, and freight cost changes due to regional production and supply capacity, setting up of own salt harvesting units will reduce cost.
 - iii. Finding alternative cheap sources of raw materials, like, maximum possible use of indigenous instead of imported limestone and similarly for other raw materials as well.

- iv. Company plans to enhance its preventive and predictive maintenance practices to reduce the maintenance costs along with spare parts management through alternate developments.
 - v. Focus on optimization of specific energy consumption in our current operations as well as upcoming expansion projects.
 - vi. The quantity restriction period will primarily help in building customer base which is currently lost due to considerable import share in market. This will ultimately help in full utilization of available existing capacity.
- II. Energy cost optimization:
- i. Exploring alternate technology interventions for generation of low-cost energy for requirement of plant; and
 - ii. Shift towards alternate fuels or cost-effective sources of utilities.
- III. Supply chain & Logistics Rationalisation:
- i. Optimisation of port-to-plant and plant-to-customer logistics, including in improvement in raw material handling techniques which will ultimately result in optimization of landed cost of raw materials to plant; and
 - ii. Inventory management improvement to reduce procurement cost stress.
- IV. Collectively, these efforts are projected to reduce cost by approximately 10%.

d) Tata Chemicals Limited

- I. Cost reduction through process and fuel optimisation:
- i. Leveraging IoT and AI-powered digital twin for the carbonation process in Soda Ash manufacturing, enabling real-time efficiency predictions and actionable advisories. This initiative has reduced process variability by 22% and improved operational efficiency.
 - ii. Sourcing fuel and other raw materials from diverse regions around the world to maintain cost-effective and sustainable operations.
 - iii. Loss minimisation measures during heavy monsoons through bund strengthening, drainage system upgrades, and increasing stacking height across salt works.
 - iv. Continuous improvement program ensures ongoing efficiency and cost reduction initiatives.
 - v. Tata Chemicals Limited is running a comprehensive total cost reduction program (Project ACE) alongwith Boston Consulting Group.

- II. Debottlenecking:
 - i. Soda Ash debottlenecking (Phase I) would increase capacity from 0.81 MTPA to 1.1 MTPA, enabling fixed-cost absorption and lowering per-ton cash costs.

- III. Supply chain & logistics cost optimisation:
 - i. Saarthi platform to include efficient in-plant movement, inbound logistics for key raw materials and outbound logistics.
 - ii. Multimodal logistics by adding container rake motions.
 - iii. Greater volume of shipments to rail networks for enhanced cost efficiency, 57% increase in bulk shipments.
 - iv. Locking in volumes through long-term contracts to improve plant load factor and logistics planning efficiency.

- IV. Benchmarking and competitive intelligence led actions:
 - i. Detailed cost benchmarking (including global producers), to help identify levers to narrow cost gaps.
 - ii. Monitoring of import price trends for operational and sourcing actions.

- V. Sustainability and compliance linked cost avoidance:
 - h. Alternative fuels e.g. biomass, including briquettes and pellets, as boiler fuel, thereby reducing reliance on fossil fuels and *fulfilling sustainability objectives*.

e) DCW Limited

- I. Improvement in productivity:
 - i. Operational stability and reduction in plant downtime have increased daily production by approximately 7 % i.e. from 247 MT/day to 293 MT/day.

- II. Improved limestone quality:
 - i. Enhanced quality of limestone will improve calcined lime availability and CO₂ generation from the lime kiln, thereby supporting higher soda ash productivity.

- III. Higher carbonator yield:
 - i. Improved yields in the carbonators are expected to reduce raw salt consumption per unit of production.

IV. Reduced ammonia consumption:

- i. Due to improved productivity and reduced losses in the ammonia recovery section, ammonia consumption is projected to decline by approximately 22%.

V. Lower fuel cost:

- i. Fuel costs are expected to decrease by approximately 7% as a result of improved boiler efficiency, optimized fuel mix, and implementation of data analytics (AI-driven) conservation measures.

VI. Reduced power cost:

- i. Power drawal from government supply is expected to reduce by approximately 17%, supported by higher production levels, increased captive power generation, and various conservation initiatives across plant operations.

VII. Through these proposed changes, DCW expects to reduce cost of production by approximately 6%.

151. These initiatives are aimed at mitigating the challenges posed by the safeguard measures and strengthening the domestic industry's operational and financial stability.

SECTION VIII – ANNEXURES

Annexure No.	Description	PDF/Excel
Annexure 1.1	Authorization letter from Association	PDF
Annexure 1.2	Authorization letter from Applicant companies	PDF
Annexure 1.3	Statement of Indian production	Excel
Annexure 2.1	Production process flowchart	PDF
Annexure 2.2	Relevant extract of Customs Tariff Act, 1975	PDF
Annexure 2.3	Country-wise import statement	Excel
Annexure 2.4	List of major producers and exporters	PDF
Annexure 2.5	List of known importers and users	PDF
Annexure 2.6	List of known user associations	PDF
Annexure 2.7	Details of export price of PUC from major countries	Excel
Annexure 3.1	MIP imposed on PUC by Government of India	PDF
Annexure 3.2	Past trade remedial actions on PUC	PDF
Annexure 3.3	Market Report – Chemical Markets Analytics (Extracts)	PDF
Annexure 3.4	Global exports from major countries	Excel
Annexure 3.5	India's schedule of tariff concessions	Excel
Annexure 6.1(a)	Injury Information	Excel
Annexure 6.1(b)	Company wise cost of production	Excel
Annexure 7.1	Trade remedial measures imposed on the various types of glass	PDF
Annexure A	Format X from applicant companies	PDF

Annexure 1.1

Authorization Letter from Association

ALKALI MANUFACTURERS ASSOCIATION OF INDIA

3rd Floor, Pankaj Chambers, Preet Vihar Commercial Complex, Vikas Marg, Delhi 110 092, India
Tel: +91-11-43027119 CIN NO. U74899DL 1994GAT056812

Ref: 2025-26/DGTR(SA)
27th January 2026

Shri Amitabh Kumar, IRS
Additional Secretary & Director General,
Directorate General of Trade Remedies,
Ministry of Commerce & Industry,
Jeevan Tara Building, 4th floor,
5, Parliament Street,
New Delhi – 110 001

Application for invoking safeguard measures (quantitative restrictions) on imports of Soda Ash

Dear Sir,

On behalf of the Indian manufacturers of Soda Ash, we are filing an application seeking imposition of Safeguard Measures (Quantitative Restrictions) on imports of Soda Ash into India. We request the Designated Authority to kindly undertake the investigation and recommend invoking Safeguard Measures (Quantitative Restrictions) on imports of the product under consideration in India. We have provided all relevant information for the purpose of the present investigation. We are willing to provide any further information which the Designated Authority may require in this connection. We request the Designated Authority to kindly:

- a. Initiate safeguard investigation to determine whether the subject goods are being imported in such increased quantities as to cause serious injury to the domestic industry in India;
- b. Determine the quota for Quantitative Restrictions that would be sufficient to address serious injury to the domestic industry;
- c. Advise the applicants for any further information that the Designated Authority considers relevant and necessary for the present purpose;
- d. Call relevant information from concerned parties with regard to increased imports and/or injury, including information from the foreign producers, Indian consumers, and other interested parties before arriving at a final decision;

- e. Provide an opportunity to the domestic industry to further supplement its submissions, after the applicants have received & reviewed the responses and information that is required to be provided by other interested parties in general and foreign producers in particular;
- f. Provide an opportunity for oral hearing;
- g. Recommend imposition of safeguard measures in the form of quantitative restrictions.

We have authorised the following consultants to represent us in the matter:

TPM Consultants,

Ish Kriti, J-209, Saket, New Delhi- 110017,

Phone. +91-11- 49892200 (16 lines),

Email: akg@tpm.in; divya@tpm.in; rahul@tpm.in; sneha@tpm.in

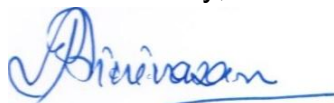
Website: www.tpm.in

TPM Consultants have been authorized, inter-alia, for the followings:

- a. to receive communication on our behalf;
- b. to file questionnaire response on our behalf;
- c. to file information on our behalf;
- d. to make submissions on our behalf;
- e. to appear for and on our behalf;
- f. to hold interactions on our behalf.

Thanking you,

Yours faithfully,

A handwritten signature in blue ink, which appears to read 'K. Srinivasan', is written over a horizontal line.

K. Srinivasan
Secretary General

Annexure 1.2

Authorization Letter from Applicant companies



CIN-U15111UP1988PLC009771

RSPL LIMITED

22nd January, 2026

Shri Amitabh Kumar, IRS
Additional Secretary & Director General,
 Directorate General of Trade Remedies,
 Ministry of Commerce & Industry,
 Jeevan Tara Building, 4th floor,
 5, Parliament Street, New Delhi – 110 001

Sub: Application for invoking safeguard measures (quantitative restrictions) on imports of soda ash

Sir,

We are hereby filing an application seeking safeguard measures (quantitative restrictions) on imports of soda ash in India. We humbly request the Hon'ble Authority to kindly undertake investigation and recommend safeguard duty on imports of the product in India. We have provided all the relevant information for the present application. We are willing to provide any further information which may be required by the Hon'ble Authority in this connection. We have authorized following firm to represent us in this matter.

TPM Consultants,

Ish Kriti, J-209, Saket, New Delhi- 110017,

Phone. +91-11- 49892200 (16 lines),

Email: akg@tpm.in; divya@tpm.in; rahul@tpm.in; sneha@tpm.in

Website: www.tpm.in

TPM Consultants have been authorized, inter-alia, for the followings:

- to receive communication on our behalf;
- to file questionnaire response on our behalf;
- to file information on our behalf;
- to make submissions on our behalf;
- to appear for and on our behalf;
- to hold interactions on our behalf.

We also certify that the information provided by us in respect of our company is true, complete and correct, on the basis of records available and generally maintained by the company, and no material has been concealed or misrepresented.

With warm regards,
For RSPL Limited,

Tinku Chhabra
 President & CEO



Corporate Office : Plot No.124, Sector - 44, Gurugram - 122003 (Haryana)

Phone : +91-124-2544186 to 88, 7518204740-41, 7233808503-504

Regd. Office : 119-121(Part), Block P & T, Fazal Ganj, Kalpi Road, Kanpur - 208012 (UP)

Phone : 0512-2221201 to 205 • Email : info@gharidetergent.com



NON - CONFIDENTIAL

NIRMA LIMITED

REGD. OFFICE : NIRMA HOUSE, ASHRAM ROAD, AHMEDABAD - 380 009. PHONE : 079 - 27546565, 27549000 FAX : 079 - 27546603, 27546605
CIN : U24240GJ1980PLC003670 • Email : info@nirma.co.in • www.nirma.co.in

22nd January, 2026

Shri Amitabh Kumar, IRS
Additional Secretary & Director General,
Directorate General of Trade Remedies,
Ministry of Commerce & Industry,
Jeevan Tara Building, 4th floor,
5, Parliament Street, New Delhi – 110 001

Sub: Application for invoking safeguard measures (quantitative restrictions) on imports of soda ash

Sir,

We are hereby filing an application seeking safeguard measures (quantitative restrictions) on imports of soda ash in India. We humbly request the Hon'ble Authority to kindly undertake investigation and recommend safeguard duty on imports of the product in India. We have provided all the relevant information for the present application. We are willing to provide any further information which may be required by the Hon'ble Authority in this connection. We have authorized following firm to represent us in this matter.

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- f. to hold interactions on our behalf.

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With warm regards,

Yours sincerely,


Akhil Maheshwari
Vice President



Better Products. Better Value. Better Living.



22nd January, 2026

Shri Amitabh Kumar, IRS
Additional Secretary & Director General,
Directorate General of Trade Remedies,
Ministry of Commerce & Industry,
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- d. to make submissions on our behalf;
- e. to appear for and on our behalf;
- f. to hold interactions on our behalf.

DCW LIMITED

HEAD OFFICE :
"NIRMAL" 3RD FLOOR, NARIMAN POINT, MUMBAI-400 021.
TEL.: 4957 3000, 4957 3001
REGISTERED OFFICE : DHRANGADHRA - 363 315 (GUJRAT STATE)
Email: ho@dcwltd.com, Website: www.dcwltd.com, CIN-L24110GJ1939PLC000748

DCW LIMITED
MUMBAI


CONTINUATION SHEET NO.

We also certify that the information provided by us in respect of our company is true, complete and correct on the basis of records available and generally maintained by the company, and no material has been concealed or misrepresented.

With Warm regards,

Yours Sincerely,

For DCW LIMITED


Ashish Jain
Managing Director





GHCL Limited

22nd January, 2026

Shri Amitabh Kumar, IRS

Additional Secretary & Director General,

Directorate General of Trade Remedies,

Ministry of Commerce & Industry,

Jeevan Tara Building, 4th floor,

5, Parliament Street, New Delhi – 110 001

Sub: Application for invoking safeguard measures (quantitative restrictions) on imports of Soda Ash

Sir,
We are hereby filing an application seeking safeguard measures (quantitative restrictions) on imports of soda ash in India. We humbly request the Hon'ble Authority to kindly undertake investigation and recommend safeguard duty on imports of the product in India. We have provided all the relevant information for the present application. We are willing to provide any further information which may be required by the Hon'ble Authority in this connection. We have authorised following firm to represent us in this matter:

TPM Consultants,

Ish Kriti, J-209, Saket, New Delhi- 110017,

Phone. +91-11- 49892200 (16 lines),

Email: akg@tpm.in; divya@tpm.in; rahul@tpm.in; sneha@tpm.in

Website: www.tpm.in

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- to make submissions on our behalf;
- to appear for and on our behalf;
- to hold interactions on our behalf.

We also certify that the information provided by us in respect of our company is true, complete and correct, on the basis of records available and generally maintained by the company, and no material has been concealed or misrepresented.

Thanking you,
Yours sincerely,

Jeetendra Gosain
VP – A&F



Works : Sutrapada, Dist. Gir-Somnath, Gujarat - 362275, India. Tel. +91-02876-263401-03, 263551-56 Fax : +91-02876-263480-83
CIN : L24100GJ1983PLC006513, E-mail : ghclinfo@ghcl.co.in, Website : www.ghcl.co.in

Regd. Office : GHCL House, Swastik Society, Opp. Punjabi Hall, Navrangpura, Ahmedabad, Gujarat-380009, India Tel. +91-079-26427519-818 Fax : +91-079-26423623
Head Office : GHCL House, B- 38, Institutional Area, Sector - 1, Noida, Uttar Pradesh - 201301, India. Ph. : +91-120-2535335, 3358000, Fax : +91-120-2535209

22 January 2026

Shri Amitabh Kumar, IRS
Additional Secretary & Director General,
Directorate General of Trade Remedies,
Ministry of Commerce & Industry,
Jeevan Tara Building, 4th floor,
5, Parliament Street, New Delhi – 110 001

Sub: Application for invoking safeguard measures (quantitative restrictions) on imports of Soda Ash

Sir,

We are hereby filing an application seeking safeguard measures (quantitative restrictions) on imports of soda ash in India. We humbly request the Hon'ble Authority to kindly undertake investigation and recommend safeguard duty on imports of the product in India. We have provided all the relevant information for the present application. We are willing to provide any further information which may be required by the Hon'ble Authority in this connection. We have authorised the following firm to represent us in this matter:

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- f. to hold interactions on our behalf.

We also certify that the information provided by us in respect of our company is true, complete and correct, on the basis of records available and generally maintained by the company, and no material has been concealed or misrepresented.

Thanking you,

Yours sincerely,
For **Tata Chemicals Limited**

Rajesh Kamat

Digitally signed by Rajesh Kamat
DN: cn=Rajesh Kamat, o=Tata Chemicals,
ou=Sales and Marketing,
email=rkamat@tatachemicals.com, c=IN
Date: 2026.02.20 20:49:14 +05'30'

Rajesh Kamat
Chief – Strategy & Projects

Annexure 1.3

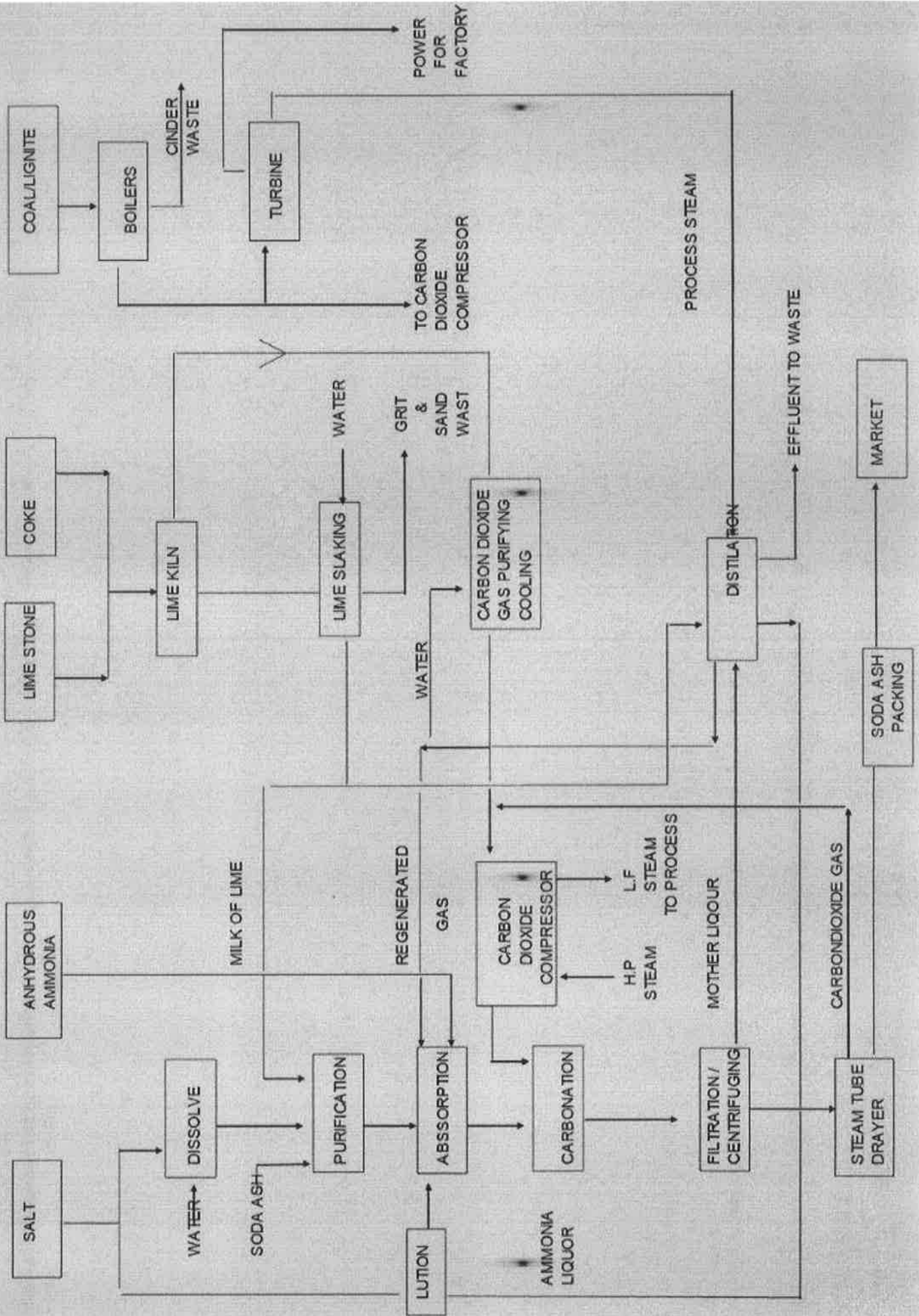
Statement of Indian production
(filed separately as excel)

Annexure 2.1

Production process flowchart

SODA ASH DIVISION

PROCESS FLOW CHART



Annexure 2.2

Extracts of Customs classification



CUSTOMS TARIFF OF INDIA

2023

THE FIRST SCHEDULE TO THE
CUSTOMS TARIFF ACT, 1975 AS
EFFECTIVE FROM **01-05-2023**

Tariff Unit, Customs Policy Wing
Central Board of Indirect Taxes and Custom

SECTION-VI

CHAPTER-28

(1)	(2)	(3)	(4)	(5)
2835 26 10	--- Calcium monobasic phosphate	kg.	7.5%	-
2835 26 20	--- Calcium tribasic phosphate	kg.	7.5%	-
2835 26 90	--- Other	kg.	7.5%	-
2835 29	-- <i>Other</i> :			
2835 29 10	--- Magnesium phosphate, monobasic	kg.	7.5%	-
2835 29 20	--- Magnesium phosphate, dibasic	kg.	7.5%	-
2835 29 30	--- Magnesium phosphate, tribasic	kg.	7.5%	-
2835 29 40	--- Sodium hexametaphosphate	kg.	7.5%	-
2835 29 90	--- Other	kg.	7.5%	-
	- <i>Polyphosphates</i> :			
2835 31 00	-- Sodium triphosphate (sodium tripoly-phosphate)	kg.	7.5%	-
2835 39 00	-- Other	kg.	7.5%	-
2836	CARBONATES; PEROXOCARBONATES (PERCARBONATES); COMMERCIAL AMMONIUM CARBONATE CONTAINING AMMONIUM CARBAMATE			
2836 20	- <i>Disodium carbonate</i> :			
2836 20 10	--- Disodium carbonate, dense	kg.	7.5%	-
2836 20 20	--- Disodium carbonate, light	kg.	7.5%	-
2836 20 90	--- Other	kg.	7.5%	-
2836 30 00	- Sodium hydrogencarbonate (sodium bicarbonate)	kg.	7.5%	-
2836 40 00	- Potassium carbonates	kg.	7.5%	-
2836 50 00	- Calcium carbonate	kg.	7.5%	-
2836 60 00	- Barium carbonate	kg.	7.5%	-
	- <i>Other</i> :			
2836 91 00	-- Lithium carbonates	kg.	7.5%	-
2836 92 00	-- Strontium carbonate	kg.	7.5%	-
2836 99	-- <i>Other</i> :			
2836 99 10	--- Percarbonates	kg.	7.5%	-
2836 99 20	--- Magnesium carbonate	kg.	7.5%	-
2836 99 30	--- Aluminium bicarbonate	kg.	7.5%	-
2836 99 90	--- Other	kg.	7.5%	-
2837	CYANIDES, CYANIDE OXIDES AND COMPLEX CYANIDES			
	- <i>Cyanides and cyanide oxides</i> :			
2837 11 00	-- Of sodium	kg.	10%	-
2837 19	-- <i>Other</i> :			
2837 19 10	--- Potassium cyanide	kg.	7.5%	-
2837 19 20	--- Double cyanide of potassium and sodium	kg.	7.5%	-
2837 19 90	--- Other	kg.	7.5%	-
2837 20	- <i>Complex cyanides</i> :			
2837 20 10	--- Ammonium sulphocyanide	kg.	7.5%	-
2837 20 20	--- Potassium ferricyanide	kg.	7.5%	-
2837 20 30	--- Potassium ferrocyanide	kg.	7.5%	-

Annexure 2.3

Statement of imports (country-wise)
(filed separately as excel)

Annexure 2.4

List of Known Major Exporters

1.	Abadan Sulfurin Company Akhola Road – 15 km of Tabriz-Khosroshahr Road – Tabriz- Iran Tel – (+98) 41-32446776 Email – info@sig.co.ir
2.	Kaveh Soda Chemical Industries Co. Headquarter: KAVEH Building, #4, oshan Blvd., Sayed Shirazi Highway, Tehran, Iran – 195698111 Phone - +982129100 Email – info@kavehglass.com
3.	Semnan Soda Ash Co. No 25, Anahita Dead End, Off Mirdamad Blvd., Afrigha (Jordan) Ave., Tehran.Iran Tel No: 0098(21)88673641 Email: ssaco@iranssaco.com , export@iranssaco.com
4.	Shiraz Petrochemical Company No. 41, Opposite of Mobasher Alley., Pol e Roumi, Shariati St., Tehran, Iran Postal Code: 1914943346 Tel : +98 21 78329000 Fax: +98 21 26458571 e-mail: info@pogdc.com
5.	M/s Trade House Ltd (Bashkirian Chemistry) Russian Federation 8, B PoluyaroslavsiyPereulok, Moscow, 105 120, Russia
6.	Open Joint Stock Company “Berezniki Soda Works”, 32, Tekhnicheskaya str., Sterlitamak, Republic of Bashkortostan, Russian Federation sodastr@soda.ru info@kaus.ru
7.	JSC Bashkirian Chemistry 8, B PoluyaroslavsiyPereulok, Moscow, 105 120, Russia
8.	SASS SODA ASH SALES & SERVICES M. Tolmachevskiy per. 10 Office 7, 8 119017 Moscow Russia
9.	M/s Public Stock Company, Crimea Soda Plant, Republic of Crimea, Email soda.str@soda.ru
10.	Eti Soda Beypazari Bogozu Mevkii PK 11, 06730, Beypazari Ankara, Turkey Email: etik@etisoda.com , etisoda@etisoda.com
11.	Soda Senayii IS Kuleleri Kule 3,4 Levant 34330, Istanbul, Turkey Email: terhan@sisecam.com
12.	Kazan Soda Electric Mulk Kume Evleri Cadde: 122 Yenikent-Sinkar/Ankara Email: etik@kazansoda.com

13.	FMC Industrial Chemicals 1735 Market Street Philadelphia, PA 19103 USA OCI Chemical Corporation 1800 West Oak Commons Court Suite 100 Marietta, GA 30062 Email: pamela.pung@fmc.com
14.	Solvay Soda Ash Headquarters 5333 Richmond Ave., Houston, TX 77098 Mailing address: P.O. Box 27328, Houston, TX 77227 Email: custinfo@solvay.com
15.	General Chemicals Industrial Products 120 Eagle Rock Avenue East Hanover, New Jersey, USA Email: SALES@GENERALCHEM.COM
16.	ANSAC 15 Riverside Avenue 2nd Floor Westport, CT 06880 USA Email: reports@lighthouse-services.com
17.	FMC Corporation Wells Fargo Bank N.A. Shareowner Services P.O. Box 64854 St. Paul, MN 55164-0854 Cr161 N. Concord Exchange South it. Paul, MN Email: pamela.pung@fmc.com
18.	CINER Resources LP Five Concourse Parkway Suite 2500 Atlanta, Georgia 30328 Email: sustainability@ciner.us.com
19.	Ciner Wyoming LLC 254 County Road 4, Green River, WY 82935, United States Email: MNicholson@ciner.us.com
20.	Ciner Resources corporation 5 Concourse Pkwy #2500, Atlanta, GA 30328, United States Email: sustainability@ciner.us.com
21.	Qingdao Soda Ash Co. Ltd. (Qingdao Soda Ash Industrial Co., Ltd.) Address: No. 78, North Siliu Road, Licang District, Qingdao, Shandong Province, 266043, China. Email: sale@qdjy.com , gyj@qdjy.com
22.	Tianjin Bohai Chemical Industry (Group Corpn Ltd.) Address: 189 Bohai 13th Road, Lingang Economic Zone, Binhai New Area, Tianjin, China. Sales Office Address: No. 8 Xuzhou Road, Heping District, Tianjin, 300042, China. Email: bhcczhh@bcig.com , info@tjbhgx.com
23.	Dahuachem (Duhachern) International Economic and Trade Corporation Address: No. 3 Ganxin Street, Ganjinzi District, Dalian, Liaoning Province, 116031, China. Email: yeweimin@dahuachem.com , dhchem1@dahuachem.com
24.	Jiangsu Yangli Group Co. Ltd. Address (Headquarters): No. 499, South Yangtze River Road, Yangzhou City, Jiangsu Province, China. Email: xuye@yangli.com , sales@yanglipress.com

25.	Shandong Haihua Group, Shandong Haihua Group Co., Ltd. Develop Zone of Haihua Weifang City, Shandong, China Email: bgs@haihua.com.cn , hhtj@sdhh.chem.com.cn
26.	Qinghai Alkali Plant (Zhejiang Glass China's Qingtai Alkali Plant (Zhejiang Glass China's Qinghai Delingha Industrial Park Zip:817000 – China Email: qinghaisaltlake@chemmail.net
27.	Jinshan chemical co. China's Zhengzhou City in Henan Province, Zhengzhou City Fushoushan Street 87,China Email: kingsun@jinshanhq.cn
28.	Hebei Tangshan Sanyou Al kali Industry Company Nanpu Development Area, TangShan,Hebei,China Email: syhk013@sanyouhk.com
29.	Tianjin Soda Ash Plant No. 87Xinhua Road Tanggu District Tianjin China Email: xs8c@tjsoda.com
30.	SIMAN LTD Pob 29 Kazanlak SL Zagora Bulgaria 6103 Email: info@siman.bg
31.	Solvay Sodi AD Zip Code: 9160, Bosnia and Herzegovina, Brunner Monday Winnington Lane Mond House, Northwich, Cheshire, UK, CW8 4DT Email: solvay.sodi@solvay.com
32.	SPIN INTERNATIONAL 13 RUE DE PASSY Paris 75016 Email: reseau@spinfrance.org
33.	BELVEDERE SRL ROMANIA Cetatianu Ioan, GALATI, Romania 800198 Email: office@belvederemotors.ro
34.	Asha Trade Import Export Mangaliei Nr 71 BL PIS SC D Apt 36 Constanta 900116Romania Email: alpha_intertrade@yahoo.com
35.	GHCL Romania Ghcl Upsom Ocna Mures Alba County Romania 515700 Email: info@gcl-intl.com
36.	Sisccam Sode Lukavac, The first street 1 75300, Lukava, Bosnia and Herzegovina Email: nakeljic@sisecam.com
37.	Magadi Soda Company P 0 Box 1 - 00205, Magadi, Kenya. Email: procurement@tatachemicals.com
38.	ALLIED NETWORKX COMPANY LTD Asili Co-Op House Moi Avenue Nairobi Kenya 72964 00200 Email: marketing@alliedservicesltd.com
39.	FMC Industrial Chemicals 1735 Market Street, Philadelphia, PA 19103 USA Email: james.fitzwater@fmc.com , APG.CustomerService@fmc.com

40.	Soda Ash Business ICI Pakistan Limited 63-Mozang Road Lahore, Pakistan Email: anas.sikandar@luckycore.com
41.	Olympia Chemicals Ltd. 23-Davis Road, Lahore, Pakistan Email: ocl_info@olympiagroup.com.pk
42.	Syrina Trade Co., Arum s.88 office 251a, Donetsk, Ukraine Email: export@kiev-chamber.org.ua

Annexure 2.5

List of Known importers/users

LIST OF KNOWN IMPORTERS/USERS	
COMPANY NAME & ADDRESS	COMPANY NAME & ADDRESS
<p>GUJRAT GUARDIAN LTD. Village, Kondh, Valia Road, Plant State Highway No. 13, Ankleshwar, Bharuch-393001 Email: info@gujaratguardian.in</p>	<p>ADVANCE SURFACTANT INDIA LTD. 511/2/1, Village Rajokri, New Delhi 110038 Email: cs@advancegroup.biz</p>
<p>FLOAT GLASS INDIA LTD. T-7, MIDC, Industrial Area, Taloja, Maharashtra Email: nshirodkar@hngfloat.com</p>	<p>A.R. STANCHEM PVT. LTD. 9, Hamanta Basu Sarani (20th Old Court House Street), 2nd Floor, Cooke and Kelvey Building, Kolkata – 700001 Email: subrata@foglgroup.com</p>
<p>ALENBIC GLASS INDUSTRIES LTD. Alembic Road, Baroda (Vadodara) Gujrat Email: rasheshshah@alembic.co.in</p>	<p>HIND SILICATES PVT. LTD. 3A, Auckland Place, 5 Floor, Kolkata-700017 Email: Contactus@hindcon.com</p>
<p>DEEPAK NITRITE LTD. Nanesari, 4/12, Chemical Complex, GIDC, Nagesari Baroda (Vadodara) Gujrat Email: investor@godeepak.com</p>	<p>TAURUS CHEMICAL (P) LTD. 318, Swapnalok, 92/93, S.D. Road, Secundrabad-500003 , AP , India Email: info@tauruschemicals.com</p>
<p>HINDUSTAN NATIONAL GLASS & IND. LTD. Rishra West Bengal Email: kol@hngil.com</p>	<p>KISHORESONS DETERGENTS PVT. LTD. 15-9-469, Mahaboobgunj Road. Hyderabad – 500012 Email: ksd003381@gmail.com</p>
<p>HINDUSTAN UNILEVER LTD. Party address Dakshina Building, 8th Floor, Plot No. 2, Sector, 11, CBD Belapur, Navi Mumbai Email:investor.relations-ul@Unilever.com, comsec.hul@unilever.com</p>	<p>J.J. PATEL INDUSTRIES Gondal Road B/H Rajkamal Petrol Pump, Vavdi Rajkot – 36004 Email: info@patelindustries.co.in, dave.anand@patelindustries.co.in bhupesh@patelindustries.co.in</p>
<p>PROCTER & GAMBLE HYGIENE & HAEALTH CARE Mandideep Plant I&C – Mgf Plot No. 182, Mandideep Madhya Pradesh Email: bohre.v@pg.com</p>	<p>SHRIRAM BHARATH CHEMICAL & DETERGENTS (P) LTD. 1/56, Sanjay Gandhi Nagar, Nochipalayam Road, 46 Podhur Village Rrode-638002 Email: srbcd.erode@gmail.com</p>
<p>ALBRIGHT MORARJI & PANDIT LTD. Ambarnath Dist. Thane Maharashtra Email: info@albright.in</p>	<p>MODERN GLASS INDUSTRIES Coal Siding Road, Firozabad-283203 (U.P) Email: sparshbansal@akugroup.in, sales@akugrup.in</p>
<p>ADVATECH INDUSTRIES PVT. LTD. Dhanali Village–Dhanali, At-Kadi District Mahesana, Gujrat</p>	<p>ADARSH KANCH UDYOG (P) LTD. WARES PVT. LTD.</p>

Email: advatechindustries@gmail.com	E-24, 2 nd Floor, Jawahar Park, Laxmi Nagar, Vikas Marg, New Delhi – 110092 Email: aku@akugroup.in , cskapilverma@gmail.com
U.P. GLASS MANUFACTURE SYNDICATE 14-Manapuram, Near Ganesh Nagar, Firozabad-283203 U.P. Email: upgmsfzd6@gmail.com	PARAGATI GALSS PVT. LTD. 111, Damji Shamji, Industrial Comlex, 9 LBS Kula (W) Mumbai-400070 Email: ashishmittal@pragatiglass.com , lokesh@pragatiglass.com
ASAHI INDIA GLASS LIMITED 5 th Floor, Tower-B, Global Business Park, Mehrauli, Gurgaon Road, Gurgaon-122002 (India) Email: mihir.mehta@aisglass.com	GORA MAL HARI RAM LTD. 39 Najafgarh Road, Ind. Area, New Delhi -110015 Email: gmhrrho555@gmail.com
FENA (P) LTD. A-237, Okhla Industrial Area, Phase-1, New Delhi-110020 Email: vijaykumar@fena.com	ROHIT SURFACTANTS (P) LTD. 117/H-2/202, Pandu Nagar Kanpur-05 Email: info@rsplgroup.com
SHREE UNICON ORGANICS P. LTD. BS-3, Apeejay, 130, Bambay Samachar Marg Mumbai-400023 Email: uniconorganics@gmail.com	ASTRAL GLASS PVT. LTD. Adinath Tower 'A' 2 nd Floor, Nancy Colony, Off Western Express Highway Borivali (East) Mumbai-400066 Email: camehulkotecha@gmail.com
POLLACHI CHAMBER OF COMMERCE & INDUSTRY R.P. Complex, 2 nd Floor, 14, Balagopalapuram Street, Pollachi-642001 Email: info@mastersindia.co	BDJ GLASS INDUSTRIES PVT. LTD. 1 KYD Street, Palce Court, 1 st Floor, Suite, 14 A, Kolkata-70016 Email: accounts@balajiglass.in
VASUNHARA RASAYAN LTD. C-104, MIDC Industrial Area, Mahed, Dist. Raigad, Maharashtra Email: hydacc@vrlindia.in	SHRI HARI INDUSTRIES, 47, Shree Veerhai Maa Niwas, Shastri Nagar Square Nagpur-440008 Email: Shriharimtc@yhao.co.in
POWER SOAP LTD. 62-B, North Boag Road, T. Nagar, Chennai-600017 Email: pandi@powersoaps.com	HINDUSTAN NATIONAL GLASS & INDUSTRIES LTD. 2, Red Cross Place, Kolkata-700001 Email: cosec@hngil.com
SHANTI NATH DETEGENTS (P) LTD., P-15, Kalakar Street, Kolkata-700007 Email: skjain@safed.in	JAGATJIT INDUSTRIES LTD. Plot No. 78, Sector-18, Institutional Area, Gurgaon-122001 Email: careers@jagatjit.com
ADVANCE HOME & PERSONAL CARE LTD., ADVANCE SURFACTANTS INDIA LTD. 511/2/1, Village Rajokri, New Delhi-110038 Email: cs@advancegroup.biz	ADVANCE SURFACTANTS INDIA LTD. 511/2/1, Village Rajokri, New Delhi-110038 Email: cs@advancegroup.biz
S. KUMAR DETERGENT P. LTD.	MAULI EXPORTS

Plot No. 34, Sector-2, Industrial Area,
Pthampur-454775, Dist. Dhar, M.P

Email: skjain@safed.in

97-98, Sector 25, Part 2 Huda Panipat,
Haryana Pincode-132103

Email: aashokajadhava@gmail.com

Annexure 2.6

List of known user associations

LIST OF ASSOCIATION

SN.	ASSOCIATION NAME AND ADDRESS
1.	DETERGENT MANUFACTURERS ASSOCIATION (DELHI REGION) 148, New Okhla industrial Complex-1, New Delhi-110020 Email: fenasil@sancharnet.net.in
2.	INDIAN CHEMICAL MERCHANTS & MANUFACTURERS ASSOCIATION, 4, India Exchange Place, Kolkata-700001 Email: icmmaoffice@gmail.com
3.	BULK DRUG MANUFACTURERS ASSOCIATION (INDIA) C-25, industrial Estate, Sanathnagar, Hyderabad-500018 Email: info@bdmai.org
4.	INDIAN GLASS MANUFACTURERS' FEDERATION B-6, Shivalik, New Delhi-110017 Email: info@playnlivengo.org info@aigmf.com
5.	THE DYES & CHEMICAL MERCHANTS ASSOCIATION 4 Mandir Street, Kolkata-700073 Email: info@dmai.org
6.	THE FEDERATION OF ALL INDIA DYES & CHEMICALS MERCHANTS ASSOCIATION 16, Maharana Pratap Sarani, 2nd Floor, Room No.5, Kolkata-700001 Email: info@dmai.org

Annexure 2.7

Details of export price of PUC (CIF price)
(filed separately as excel)

Annexure 3.1

Minimum Import Price (MIP) imposed on imports of
Soda Ash by Government of India

Government of India
Ministry of Commerce & Industry
Department of Commerce
Directorate General of Foreign Trade

Notification No. 46 /2024-25
New Delhi, Dated: 30th December 2024

Subject: Imposition of Minimum Import Price (MIP) on import of Soda Ash covered under Chapter 28 of ITC (HS) 2022, Schedule –I (Import Policy) – regarding.

S.O. (E): In exercise of powers conferred by Section 3 read with Section 5 of Foreign Trade (Development & Regulation) Act, 1992, read with paragraph 1.02 and 2.01 of the Foreign Trade Policy (FTP) 2023, as amended from time to time, the Central Government hereby revises the Import Policy and Import Policy Condition of the following ITC(HS) Codes covered under Chapter 28 of ITC (HS) 2022, Schedule–I (Import Policy), **up to 30th June 2025**, as under:

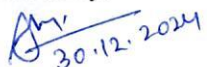
ITC(HS) Code	Item Description	Existing Import Policy	Revised Import Policy	Existing Policy condition	Revised Policy condition
28362010	- Disodium carbonate, dense	Free	Restricted	-	However, import is 'Free' if CIF value is Rs. 20,108 or above per MT
28362020	- Disodium carbonate, light	Free	Restricted	-	However, import is 'Free' if CIF value is Rs. 20,108 or above per MT
28362090	- Other	Free	Restricted	-	However, import is 'Free' if CIF value is Rs. 20,108 or above per MT

2. The existing 'Free' Import Policy, as it stands prior to the issuance of this Notification, shall be in effect starting from 1st July 2025, unless expressly amended by subsequent notification.

Effect of the Notification:

Minimum Import Price (MIP) of Rs. 20,108 per MT is imposed on Disodium Carbonate (Soda Ash) covered under Chapter 28 of ITC (HS) 2022, Schedule–I (Import Policy), up to 30th June 2025.

This is issued with the approval of Minister of Commerce & Industry.


(Santosh Kumar Sarangi)
Director General of Foreign Trade &
Ex- officio Addl. Secretary to the Government of India
E-mail: dgft@nic.in

(Issued from F.No. 01/89/180/04/AM-24/PC-2[A]/E-39595)

[To be published in the Gazette of India Extraordinary Part-II, Section-3, Sub-Section (ii)]

Government of India
Ministry of Commerce & Industry
Department of Commerce
Directorate General of Foreign Trade
Vanijya Bhawan

Notification No. 23/2025-26
New Delhi, Dated: 30 June, 2025


Subject: Extension in Minimum Import Price (MIP) Condition on import of Soda Ash covered under Chapter 28 of ITC (HS) 2022, Schedule-I (Import Policy)- reg

S.O. (E): In exercise of powers conferred by Section 3 and Section 5 of Foreign Trade (Development & Regulation) Act, 1992, read with paragraph 1.02 and 2.01 of the Foreign Trade Policy 2023, as amended from time to time, and in continuation of Notification No. 46/2024-25 dated 30.12.2024, the Central Government hereby **extends** the Minimum Import Price (MIP) condition on 03 HS Codes of Soda Ash (Disodium carbonate) 28362010, 28362020 and 28362090 under Chapter 28 of the ITC (HS), 2022, Schedule -I (Import Policy) for a further period of six months i.e. from 01.07.2025 **upto 31.12.2025**.

Effect of the Notification:

Minimum Import Price (MIP) @ Rs. 20,108 per MT on import of Disodium Carbonate (Soda Ash) has been **extended upto 31.12.2025**.

This is issued with the approval of Minister of Commerce & Industry


(Ajay Bhadoo)
Addl. Secretary to the Government of India &
Director General of Foreign Trade
Email: dgft@nic.in

(Issued from F. No. 01/89/180/04/AM-24/PC-2[A]/E-39595)

Annexure 3.2

Past trade remedial measures on
imports of Soda Ash

**LIST OF DATE AND EVENTS IN ADD INVESTIGATION ON IMPORTS OF SODA
ASH FROM TURKEY AND RUSSIA**

S.NO.	EVENT	DATE
1.	Original investigation	
2.	Initiation of investigation	10.02.2012
3.	Final Findings	09.02.2013
4.	Customs Notification for imposition	18.04.2013
5.	MTR	
6.	Initiation of investigation	01.10.2015
7.	Final Findings	23.09.2016
8.	Final Findings (post remand from HC)	22.07.2017
9.	SSR	
10.	Initiation of investigation	16.04.2018
11.	Final Findings (duties discontinued)	14.03.2019

**LIST OF DATE AND EVENTS IN ADD INVESTIGATION ON IMPORTS OF SODA
ASH FROM CHINA PR, EU, KENYA, PAKISTAN, IRAN, UKRAINE & USA.**

S.NO.	EVENT	DATE
1.	Original investigation	
2.	Initiation of investigation	20.08.2010
3.	Preliminary Findings	02.09.2011
4.	Final Findings	17.02.2012
5.	Customs Notification for imposition	03.07.2012
6.	MTR	
7.	Initiation of investigation	21.07.2015
8.	Final Findings	23.09.2016
9.	Final Findings (post remand from HC)	22.07.2017
10.	SSR	
11.	Initiation of investigation	16.06.2017
12.	Final Findings (duties discontinued)	14.12.2018

**LIST OF DATE AND EVENTS IN ADD INVESTIGATION ON IMPORTS OF SODA
ASH FROM CHINA PR**

S.NO.	EVENT	DATE
1.	Original investigation	
2.	Initiation of investigation	05.07.1999
3.	Preliminary Findings	18.11.1999
4.	Final Findings	11.07.2000
5.	Customs Notification for imposition	04.08.2000

**LIST OF DATE AND EVENTS IN ADD INVESTIGATION ON IMPORTS OF SODA
ASH FROM RUSSIA, USA, TURKEY AND IRAN**

S.NO.	EVENT	DATE
1.	Original investigation	
2.	Initiation of investigation	30.09.2024
3.	Final Findings (positive finding)	29.09.2025

**LIST OF DATE AND EVENTS IN SAFEGUARD INVESTIGATION ON IMPORTS
OF SODA ASH**

S.NO.	EVENT	DATE
1.	Original investigation	
2.	Preliminary imposition	20.04.2009
3.	Customs Notification for definitive imposition	05.11.2009
4.	Review	
5.	Final findings	13.04.2010
6.	Customs Notification for continuation	28.06.2010

Annexure 3.3

The Global Soda Ash - Monthly Market Report
Chemical Market Analytics (Market Report)

(contains third party information procured from secondary sources which the applicant is not authorised to disclosed. Relevant information has been provided in the submission alongwith name and source of the report)

Annexure 3.4

Export statements from major
supplying countries
(filed separately as excel)

Annexure 3.5

India's schedule of tariff concessions
(filed separately as excel)

Annexure 6.1(a)

Injury information
(contains business proprietary information,
not amenable to summarisation)

Annexure 6.1(b)

Statement of cost of production (company-wise)
(contains business proprietary information, not
amenable to summarisation)

Annexure 7.1

Trade remedial measures imposed
on the various types of glass

Duties imposed on various types of glasses

SN	Product	Country	Duty recommended
1.	Clear Float Glass	Pakistan, Saudi Arabia, UAE	<u>Original investigation</u> Saudi Arabia – 165.07 USD/MT, UAE – 111.15 USD/MT, Pakistan – 123.61 USD/MT <u>Sunset Review investigation -</u> Saudi Arabia – 165.07 USD/MT, UAE – 111.15 USD/MT, Pakistan – 123.61 USD/MT
2.	Textured Tempered Glass whether Coated or Uncoated	Malaysia	<u>Original investigation</u> 114.58 USD/MT <u>Sunset Review investigation -</u> No duty
3.	Toughened glass for home appliances having thickness between 1.8 MM to 8 MM and area of 0.4 Sqm or less	China	243 USD/MT
4.	Textured Tempered Glass whether Coated or Uncoated	China	<u>Original investigation</u> 136.21 USD/MT <u>Sunset Review investigation -</u> 302.65 USD/MT
5.	Clear Float Glass	Bangladesh, Thailand	Bangladesh and Thailand - 306.10 USD/MT
6.	Clear Float Glass nominal thicknesses ranging from 4mm to 12mm (both inclusive)	Iran	<u>Original investigation</u> 55.59 USD/MT <u>Sunset Review investigation -</u> 54.36 USD/MT
7.	Float Glass	China and Indonesia	<u>Original investigation -</u> Indonesia 81.21 USD/MT, China 72.27 USD/MT <u>Sunset Review investigation –</u> Indonesia 81.21 USD/MT, China 133 USD/MT <u>Second Sunset Review investigation-</u> China 218 USD/MT <u>Third Sunset Review investigation-</u>

Soda Ash Safeguard (Quantitative Restrictions)

Non - Confidential

			China 218 USD/MT
8.	Clear Float Glass	Malaysia	326 USD/MT
9.	Sheet Glass	China	<u>Original investigation</u> - 63 USD/MT <u>Sunset Review investigation</u> – 63 USD/MT
10.	Glassware	China and Indonesia	China 955.27 USD/MT, Indonesia 955.27 USD/MT
11.	Unframed mirror glass	China	US\$ 234/mt (fixed ADD)

Annexure A

Format X



CIN-U15111UP1988PLC009771

RSPL LIMITED

In the matter of application for invoking safeguard measures (quantitative restrictions) concerning imports of "Soda Ash"

**CERTIFICATE BY THE CHIEF EXECUTIVE OF THE COMPANY / DIRECTORS /
PARTNERS OR THE PROPRIETOR OF THE FIRM**

1. I, Shri Tinku Chhabra am the President & CEO of RSPL Limited (Soda Ash Division) and am authorized for filing the submissions for the subject application on behalf of the company. I have personally verified all documents / information / evidence (as given in Annexure) with the original documents, books of accounts and records and on the basis of such verification do hereby certify.
 - a. That the data/ information/ documents/ evidence so provided in the application are accurate and adequate inter-alia in terms of Rule 5(3) of the Safeguard Measures (Quantitative Restrictions) Rules, 2012; the Foreign Trade (Development & Regulation) Amendment Act, 2010, and the trade notices/ circulars issued thereunder by the Authority from time to time;
 - b. That the documents mentioned at S. No. from Annexure A to Annexure VI are complete, authentic, and correct extracts of or compilation from the books of accounts consistently maintained by the company in the ordinary course of business;
 - c. That the documents mentioned at S. No. from Annexure A to Annexure VI are true and exact copies of original documents available in the company for verification;
 - d. That all the information/ documents/ evidence submitted are true and correct to the best of my knowledge and belief;
 - e. That I have neither knowingly and/ or wilfully concealed or misrepresented any information nor made any false statement;
 - f. That there is no misstatement/ misrepresentation of facts in the documents/ information/ data/ evidence submitted herewith.

2. I/We further certify and declare that –
 - a. Complete cost data for all the unit of the applicant manufacturing and selling PUC, without leaving any unit manufacturing and selling PUC has been provided.
 - b. The application is as per the procedure laid down under Trade Notice No. 01/2023.
 - c. Complete details of revaluation/impairment of assets, if any, during the injury period including the POI has been provided.

Corporate Office : Plot No.124, Sector - 44, Gurugram - 122003 (Haryana)

Phone : +91-124-2544186 to 88, 7518204740-41, 7233808503-504

Regd. Office : 119-121(Part) Block P & T, Fazal Ganj, Kalpi Road, Kanpur - 208012 (UP)

Phone : 0512-2221201 to 205 • Email : info@gharidetergent.com



CIN-U15111UP1988PLC009771

RSPL LIMITED

- d. The detailed break-up of Head Office Expenses/ Misc. Expenses/ Other Expenses/ Admin. Overheads/ Selling & Distribution Overheads have been provided.
3. I am fully aware:
- a. I shall be responsible for the consequences of any deliberate or wilful and/or fraudulent concealment, mis-declaration or misrepresentation in any manner whatsoever;
- b. That in the event of:
- Any statement/ document/ data/ information/ evidence found to be incorrect, misleading, misrepresented, fraudulent, concealed or mis-declared or contrary to the facts;
 - Any refusal of access to the information / documents/ data/ evidence on demand as and to the extent deemed necessary by the Authority; or
 - Impeding the investigation in any manner whatsoever.

The Designated Authority reserves the right to take any action against my company including the whole/partial rejection of our submissions, use of best/adverse facts available, rejection of our application/ petition or debarring my company from representing in DGTR as an interested party for any specified period.

- c. That I herewith undertake to provide the relevant books of accounts, records, original documents, evidence, etc. for verification as and when demanded by the Authority.



Signature:

Name of signatory: Tinku Chhabra

Designation: President & CEO

Date: 22/01/2026

Corporate Office : Plot No.124, Sector - 44, Gurugram - 122003 (Haryana)

Phone : +91-124-2544186 to 88, 7518204740-41, 7233808503-504

Regd. Office : 119-121(Part) Block P & T, Fazal Ganj, Kalpi Road, Kanpur - 208012 (UP)

Phone : 0512-2221201 to 205 • Email : info@gharidetergent.com



NIRMA LIMITED

REGD. OFFICE : NIRMA HOUSE, ASHRAM ROAD, AHMEDABAD - 380 009. PHONE : 079 - 27546565, 27549000 FAX : 079 - 27546603, 27546605
CIN : U24240GJ1980PLC003670 • Email : info@nirma.co.in • www.nirma.co.in

In the matter of application for invoking safeguard measures (quantitative restrictions) concerning imports of "Soda Ash"

CERTIFICATE BY THE CHIEF EXECUTIVE OF THE COMPANY / DIRECTORS / PARTNERS OR THE PROPRIETOR OF THE FIRM

1. I, Shri Akhil Maheshwari am the Vice President of M/s Nirma Limited and am authorized for filing the submissions for the subject application on behalf of the company. I have personally verified all documents / information / evidence (as given in Annexure) with the original documents, books of accounts and records and on the basis of such verification do hereby certify.
 - a. That the data/ information/ documents/ evidence so provided in the application are accurate and adequate inter-alia in terms of Rule 5(3) of the Safeguard Measures (Quantitative Restrictions) Rules, 2012; the Foreign Trade (Development & Regulation) Amendment Act, 2010, and the trade notices/ circulars issued thereunder by the Authority from time to time;
 - b. That the documents mentioned at S. No. from Annexure A to Annexure VI are complete, authentic, and correct extracts of or compilation from the books of accounts consistently maintained by the company in the ordinary course of business;
 - c. That the documents mentioned at S. No. from Annexure A to Annexure VI are true and exact copies of original documents available in the company for verification;
 - d. That all the information/ documents/ evidence submitted are true and correct to the best of my knowledge and belief;
 - e. That I have neither knowingly and/ or wilfully concealed or misrepresented any information nor made any false statement;
 - f. That there is no misstatement/ misrepresentation of facts in the documents/ information/ data/ evidence submitted herewith.

2. I/We further certify and declare that –
 - a. Complete cost data for all the unit of the applicant manufacturing and selling PUC, without leaving any unit manufacturing and selling PUC has been provided.
 - b. The application is as per the procedure laid down under Trade Notice No. 01/2023.
 - c. Complete details of revaluation/impairment of assets, if any, during the injury period including the POI has been provided.
 - d. The detailed break-up of Head Office Expenses/ Misc. Expenses/ Other Expenses/ Admin. Overheads/ Selling & Distribution Overheads have been provided.

3. I am fully aware:
 - a. I shall be responsible for the consequences of any deliberate or wilful and/or fraudulent concealment, mis-declaration or misrepresentation in any manner whatsoever;



Better Products. Better Value. Better Living.



NIRMA LIMITED

REGD. OFFICE : NIRMA HOUSE, ASHRAM ROAD, AHMEDABAD - 380 009. PHONE : 079 - 27546565, 27549000 FAX : 079 - 27546603, 27546605
CIN : U24240GJ1980PLC003670 • Email : info@nirma.co.in • www.nirma.co.in

- b. That in the event of:
- Any statement/ document/ data/ information/ evidence found to be incorrect, misleading, misrepresented, fraudulent, concealed or mis-declared or contrary to the facts;
 - Any refusal of access to the information / documents/ data/ evidence on demand as and to the extent deemed necessary by the Authority; or
 - Impending the investigation in any manner whatsoever.

The Designated Authority reserves the right to take any action against my company including the whole/partial rejection of our submissions, use of best/adverse facts available, rejection of our application/ petition or debarring my company from representing in DGTR as an interested party for any specified period.

- c. That I herewith undertake to provide the relevant books of accounts, records, original documents, evidence, etc. for verification as and when demanded by the Authority.

Signature : 
Name of signatory : Akhil Maheshwari
Designation : Vice President
Date : 22-01-2026



Better Products. Better Value. Better Living.



In the matter of application for invoking safeguard measures (quantitative restrictions) concerning imports of "Soda Ash"

**CERTIFICATE BY THE CHIEF EXECUTIVE OF THE COMPANY / DIRECTORS /
PARTNERS OR THE PROPRIETOR OF THE FIRM**

1. I, Shri **Jeetendra B Gosain** am the **Vice President - F&A** of M/s **GHCL Limited** and am authorized for filing the submissions for the subject application on behalf of the company. I have personally verified all documents / information / evidence (as given in Annexure) with the original documents, books of accounts and records and on the basis of such verification do hereby certify.
 - a. That the data/ information/ documents/ evidence so provided in the application are accurate and adequate inter-alia in terms of Rule 5(3) of the Safeguard Measures (Quantitative Restrictions) Rules, 2012; the Foreign Trade (Development & Regulation) Amendment Act, 2010, and the trade notices/ circulars issued thereunder by the Authority from time to time;
 - b. That the documents mentioned at S. No. from Annexure A to Annexure VI are complete, authentic, and correct extracts of or compilation from the books of accounts consistently maintained by the company in the ordinary course of business;
 - c. That the documents mentioned at S. No. from Annexure A to Annexure VI are true and exact copies of original documents available in the company for verification;
 - d. That all the information/ documents/ evidence submitted are true and correct to the best of my knowledge and belief;
 - e. That I have neither knowingly and/ or wilfully concealed or misrepresented any information nor made any false statement;
 - f. That there is no misstatement/ misrepresentation of facts in the documents/ information/ data/ evidence submitted herewith.

2. I/We further certify and declare that –
 - a. Complete cost data for all the unit of the applicant manufacturing and selling PUC, without leaving any unit manufacturing and selling PUC has been provided.
 - b. The application is as per the procedure laid down under Trade Notice No. 01/2023.
 - c. Complete details of revaluation/impairment of assets, if any, during the injury period including the POI has been provided.



GHCL Limited

- d. The detailed break-up of Head Office Expenses/ Misc. Expenses/ Other Expenses/ Admin. Overheads/ Selling & Distribution Overheads have been provided.
3. I am fully aware:
- I shall be responsible for the consequences of any deliberate or wilful and/or fraudulent concealment, mis-declaration or misrepresentation in any manner whatsoever;
 - That in the event of:
 - Any statement/ document/ data/ information/ evidence found to be incorrect, misleading, misrepresented, fraudulent, concealed or mis-declared or contrary to the facts;
 - Any refusal of access to the information / documents/ data/ evidence on demand as and to the extent deemed necessary by the Authority; or
 - Impeding the investigation in any manner whatsoever.

The Designated Authority reserves the right to take any action against my company including the whole/partial rejection of our submissions, use of best/adverse facts available, rejection of our application/ petition or debarring my company from representing in DGTR as an interested party for any specified period.

- That I herewith undertake to provide the relevant books of accounts, records, original documents, evidence, etc. for verification as and when demanded by the Authority.



Jeetendra B Gosain
Vice President - F&A
24-01-2026



In the matter of application for invoking safeguard measures (quantitative restrictions) concerning imports of "Soda Ash"

CERTIFICATE BY THE CHIEF EXECUTIVE OF THE COMPANY / DIRECTORS / PARTNERS OR THE PROPRIETOR OF THE FIRM

1. I, Ashish Jain, am the Managing Director (Authorised Signatory) of DCW Ltd., and I am authorized for filling the submissions for the subject application on behalf of the company. and am authorized for filing the submissions for the subject application on behalf of the company. I have personally verified all documents / information / evidence (as given in Annexure) with the original documents, books of accounts and records and on the basis of such verification do hereby certify.
 - a. That the data/ information/ documents/ evidence so provided in the application are accurate and adequate inter-alia in terms of Rule 5(3) of the Safeguard Measures (Quantitative Restrictions) Rules, 2012; the Foreign Trade (Development & Regulation) Amendment Act, 2010, and the trade notices/ *circulars* issued thereunder by the Authority from time to time;
 - b. That the documents mentioned at S. No. from Annexure A to Annexure VI are complete, authentic, and correct extracts of or compilation from the books of accounts consistently maintained by the company in the ordinary course of business;
 - c. That the documents mentioned at S. No. from Annexure A to Annexure VI are true and exact copies of original documents available in the company for verification;
 - d. That all the information/ documents/ evidence submitted are true and correct to the best of my knowledge and belief;
 - e. That I have neither knowingly and/ or wilfully concealed or misrepresented any information nor made any false statement;
 - f. That there is no misstatement/ misrepresentation of facts in the documents/ information/ data/ evidence submitted herewith.

2. I/We further certify and declare that –
 - a. Complete cost data for all the unit of the applicant manufacturing and selling PUC, without leaving any unit manufacturing and selling PUC has been provided.

DCW LIMITED

HEAD OFFICE :

"NIRMAL" 3RD FLOOR, NARIMAN POINT, MUMBAI-400 021.

TEL.: 4957 3000, 4957 3001

REGISTERED OFFICE : DHRANGADHRA - 363 315 (GUJRAT STATE)

Email: ho@dcwlimited.com, Website: www.dcwlimited.com, CIN-L24110GJ1939PLC000748

DCW LIMITED
MUMBAI

CONTINUATION SHEET NO.

- b. The application is as per the procedure laid down under Trade Notice No. 01/2023.
- c. Complete details of revaluation/impairment of assets, if any, during the injury period including the POI has been provided.
- d. The detailed break-up of Head Office Expenses/ Misc. Expenses/ Other Expenses/ Admin. Overheads/ Selling & Distribution Overheads have been provided.
3. I am fully aware:
- a. I shall be responsible for the consequences of any deliberate or wilful and/or fraudulent concealment, mis-declaration or misrepresentation in any manner whatsoever;
- b. That in the event of:
- Any statement/ document/ data/ information/ evidence found to be incorrect, misleading, misrepresented, fraudulent, concealed or mis-declared or contrary to the facts;
 - Any refusal of access to the information / documents/ data/ evidence on demand as and to the extent deemed necessary by the Authority; or
 - Impending the investigation in any manner whatsoever.

The Designated Authority reserves the right to take any action against my company including the whole/partial rejection of our submissions, use of best/adverse facts available, rejection of our application/ petition or debarring my company from representing in DGTR as an interested party for any specified period.

- c. That I herewith undertake to provide the relevant books of accounts, records, original documents, evidence, etc. for verification as and when demanded by the Authority.

With Warm regards,

Yours Sincerely,

For DCW LIMITED

Ashish Jain
Managing Director





In the matter of application for invoking safeguard measures (quantitative restrictions) concerning imports of "Soda Ash"

CERTIFICATE BY THE CHIEF EXECUTIVE OF THE COMPANY / DIRECTORS / PARTNERS OR THE PROPRIETOR OF THE FIRM

1. I, Shri Nandakumar Tirumalai, am the Chief Finance Officer (CFO) of Tata Chemicals Limited and am authorized for filing the submissions for the subject application on behalf of the company. I have personally verified all documents/information/evidence (as given in Annexure) with the original documents, books of accounts and records and on the basis of such verification, do hereby certify.
 - a. That the data/ information/ documents/ evidence so provided in the application are accurate and adequate inter alia in terms of Rule 5(3) of the Safeguard Measures (Quantitative Restrictions) Rules, 2012; the Foreign Trade (Development & Regulation) Amendment Act, 2010, and the trade notices/ circulars issued thereunder by the Authority from time to time;
 - b. That the documents mentioned at S. No. from Annexure A to Annexure VI are complete, authentic, and correct extracts of or compilation from the books of accounts consistently maintained by the company in the ordinary course of business;
 - c. That the documents mentioned at S. No. from Annexure A to Annexure VI are true and exact copies of the original documents available in the company for verification;
 - d. That all the information/ documents/ evidence submitted are true and correct to the best of my knowledge and belief;
 - e. That I have neither knowingly and/ or wilfully concealed or misrepresented any information nor made any false statement;
 - f. That there is no misstatement/ misrepresentation of facts in the documents/ information/ data/ evidence submitted herewith.
2. I/We further certify and declare that –
 - a. Complete cost data for all the unit of the applicant manufacturing and selling PUC, without leaving any unit manufacturing and selling PUC has been provided.
 - b. The application is as per the procedure laid down under Trade Notice No. 01/2023.
 - c. Complete details of revaluation/impairment of assets, if any, during the injury period including the POI has been provided.

- d. The detailed break-up of Head Office Expenses/ Misc. Expenses/ Other Expenses/ Admin. Overheads/ Selling & Distribution Overheads have been provided.
3. I am fully aware:
- a. I shall be responsible for the consequences of any deliberate or wilful and/or fraudulent concealment, mis-declaration or misrepresentation in any manner whatsoever;
- b. That in the event of:
- i. Any statement/ document/ data/ information/ evidence found to be incorrect, misleading, misrepresented, fraudulent, concealed or mis-declared or contrary to the facts;
 - ii. Any refusal of access to the information / documents/ data/ evidence on demand as and to the extent deemed necessary by the Authority; or
 - iii. Impeding the investigation in any manner whatsoever.

The Designated Authority reserves the right to take any action against my company including the whole/partial rejection of our submissions, use of best/adverse facts available, rejection of our application/ petition or debarring my company from representing in DGTR as an interested party for any specified period.

- c. That I herewith undertake to provide the relevant books of accounts, records, original documents, evidence, etc. for verification as and when demanded by the Authority.



Signature:

Name of signatory: Nandakumar Tirumalai

Designation: Chief Finance Officer

Date: 22 January 2026

TATA CHEMICALS LIMITED

Bombay House 24 Homi Mody Street Fort Mumbai 400 001
Tel 91 22 6665 8282 Fax 91 22 6665 8143/44 www.tatachemicals.com
CIN : L24239MH1939PLC002893

**Post initiation
Questionnaire for Exporters
Product Under Consideration: “Soda Ash”**

Section 1: General Information:

- i. Complete details about identity:
 - a. Name of the enterprise: Legal form/status of your company and the country under which it has been established/registered/incorporated. In case there has been any change in the structure of your company, please elaborate every change in the period of investigation, including most recent period.
 - b. Address and contact number: Complete correspondence address of your main corporate office and your office in India, if any, along with telephone number, mobile number, and e-mail address of the corporate office and office in India, if any.
 - c. List the factories involved in the production of the product under investigation, with complete correspondence address, telephone number, e-mail address, mobile number and e-mail address.
 - d. Contact person: Name, complete correspondence address, telephone number, mobile number and e-mail address of the principal contact person (or representative/legal representative in India or elsewhere for the purpose of this investigation).
- ii. Distribution and marketing channel: In home market and for exports to India.

Section 2: Details of Exported Product

- a. Name of the product exported by you.
- b. Description of the product including various grades, sizes, models, types, etc.
- c. Provide a complete set of catalogues and brochures issued by your company as well as the specification sheets of the product (in English or accompanied by English translations) covering various grades, sizes, models, types, etc. of the product concerned sold in the domestic and exported to India.
- d. Provide full description, specifications of the product involved in the investigation exported by you. If you consider that product exported by you, though falling within the product description as defined by the Authority, differs from the product under consideration in any way in physical/ technical/ chemical characteristics, etc. or has specific characteristics or use which singles it out from the product under investigation, please provide detailed documentary evidence justifying your position.
- e. If you consider that **Soda Ash** exported by you is outside the scope of the product under consideration, please provide relevant documentary evidence justifying your position.
- f. If you consider that **Soda Ash** exported by you to India is outside the scope of the product under consideration, please provide a complete set of catalogues and brochures issued by your company as well as the specification sheets of the product (in English or accompanied by English translations) covering various grades, sizes, models, types, etc. of the product concerned exported to India or any other relevant

documentary information justifying your position.

- g. Quality and characteristics of the product.
- h. Raw materials, components and other inputs used for the production.
- i. Provide in detail the production process used by your company to manufacture product under consideration / directly competitive product including the major raw materials used.
- j. Details of industrial users/consumers of exported product.

Section 3: Capacity, Production, Volume and Price of Exports (financial year April-March)

- a. Capacity of product under consideration and/or directly competitive product for 2020-21, 2021-22, 2022-23, 2023-24, April 2024–December 2024 and January 2025-September 2025.
- b. Production: of product under consideration and/or directly competitive product for 2020-21, 2021-22, 2022-23, 2023-24, April 2024–December 2024 and January 2025-September 2025.
- c. Cost of Production during the above periods.
- d. Selling price per unit in domestic market during the above periods.
- e. Export/selling price per unit in India during the above periods.
- f. Whether you have any agent or office in India, if yes their names and address, Tel. no., e-mail address.
- g. Quantity exported to India: Provide invoice wise details of export volume and value (specify unit of measurement) during the period 2020-21, 2021-22, 2022-23, 2023-24, April 2024–December 2024 and January 2025-September 2025.
- h. Your commitment to supply the product in different markets including India.

ECONOMIC INTEREST QUESTIONNAIRE

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

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

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PART-I. GENERAL SECTION ¹(FOR ALL STAKEHOLDERS INCLUDING ADMINISTRATIVE/LINE MINISTRY)

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

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

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

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

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

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

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

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

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

¹ Please fill N.A. (not applicable), wherever applicable.

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

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

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

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

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

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

1. (a) Indicate whether you have entered into any long-term contracts with the suppliers of the PUC in India as well as internationally.

(b) Also specify whether you can switch suppliers in case of imposition of duty on PUC. If not, specify the reasons for your inability to switch suppliers.

(c) Clarify as to whether the finished products produced by your company has a substitute. Also indicate whether it is likely that consumers would switch to another product in case the cost of your product increases due to the imposition of the duty on PUC, if levied.
2. Substantiate with calculations whether the downstream industry would bear or pass on the increase in the costs due to the duty on PUC, if levied.
3. Substantiate as to how the duties on the PUC (previous duties in place or duties, if levied on the PUC pursuant to the present investigation) imported from subject country or other countries have impacted the costs and prices of the Downstream Product during IIP:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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