Government of Pakistan
National Tariff Commission

Statement of Essential Facts

of

Sunset Review of Anti-Dumping Duties Imposed on Dumped Imports of Phthalic Anhydride into Pakistan Originating in and/or Exported from the People's Republic of China, Chinese Taipei, Russian Federation and Republic of Korea

A.D.C No. 56/2019/NTC/PA/SSR/2026
August 19, 2026

A. Introduction

This Statement of Essential Facts ("SEF") is prepared pursuant to Rule 15(1) of the Anti-Dumping Duties Rules, 2022 (the "Rules") in relation to the sunset review of the anti-dumping duties levied by the National Tariff Commission (the "Commission") on dumped imports of Phthalic Anhydride ("Phthalic Anhydride") into Pakistan originating in and/or exported from the People's Republic of China, Chinese Taipei, Russia and Republic of Korea (the "Exporting Countries"). The Commission initiated this Sunset Review on May 23, 2026, following the receipt of an application from M/s Nimir Chemicals Pakistan Limited, Lahore and M/s PA-Chem Global Private Limited, Lahore (the "Applicants") on April 15, 2026, in response to the notice of impending expiry of anti-dumping duties imposed on dumped imports of Phthalic Anhydride from Exporting Countries, published in official Gazette and national press on March 02, 2026, in accordance with Section 58(2) of the Anti-Dumping Duties Act, 2015 (the "Act").

B. Purpose

2. In terms of Rule 15(1) of the Rules, at least thirty days before the proposed date of the final determination, the Commission shall inform all interested parties, in writing, of the essential facts under consideration which shall form the basis of a decision whether to continue the definitive antidumping duty imposed on dumped imports.

3. Purpose of this SEF is to provide interested parties an opportunity to comment on essential facts before the sunset review is finalized. In terms of Rule 15(2) of the Rules, the interested parties may submit views, comments, if any, in writing on the information disclosed in this SEF, not later than fifteen days of such disclosure by the Commission.

4. Interested parties intending to respond to this SEF must also submit a non-confidential version of the confidential information, in terms of Section 31 of the Act, to be placed on the public file maintained by the Commission under Rule 7 of the Rules. Submissions should be sent to:

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Director (Investigation),
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C. Essential Facts of the Case

5. Definitive Anti-dumping Duty Imposed on Phthalic Anhydride

5.1 Initially, the Commission imposed definitive anti-dumping duties ranging from 9.57 to 24.61 percent in *ad valorem* terms on dumped imports of Phthalic Anhydride, importable from the Exporting Countries for a period of five years, effective from June 05, 2021. The details of anti-dumping duties imposed are given below:

Table-I
Definitive Anti-Dumping Duty Rates

Country	**Exporter/Foreign Producer**	**Duty Rates (%)**
(1)	(2)	(3)
South Korea	Hanwa Solutions	9.57
	All other Exporters/Producers	14.82
Chinese Taipei	Nan Ya Plastics	14.94
	All Other Exporters/Producers	24.61
China	All Exporters/Producers	11.12
Russia	All Exporters/Producers	16.31

5.2 In terms of Section 58(3) of the Act, the definitive anti-dumping duty shall not expire if the Commission determines in a review initiated before expiry of the anti-dumping duty that the expiry of such duty would likely lead to continuation or recurrence of dumping of the investigated product and injury to the domestic industry. Further, on initiation of the sunset review before expiry of the anti-dumping duty, such duty shall remain in force pending the outcome of the review.

6. <u>Receipt of Application</u>

6.1 The Commission published a notice of impending expiry of anti-dumping duties imposed on dumped imports of Phthalic Anhydride from the Exporting Countries in official Gazette and national press on March 02, 2026, in accordance with Section 58(2) of the Act.

6.2 In response to the notice of impending expiry, on April 15, 2026, the Commission received a written application under Section 58 of the Act from the Applicants, who is the domestic producer of Phthalic Anhydride.

6.3 The Applicants have stated that expiry of anti-dumping duty on Phthalic Anhydride from Exporting Countries would be likely to lead to the continuation and recurrence of dumping of Phthalic Anhydride and material injury to the domestic industry. The Applicants have requested the Commission for continuation of the anti-dumping duties for a period of further five years on dumped imports of Phthalic Anhydride originating in and/or exported from Exporting Countries.

7. <u>Domestic Industry</u>

In the original anti-dumping investigation, the domestic industry consisted of only one unit i.e., M/s Nimir Chemicals Pakistan Limited, Lahore. However, in 2023, M/s PA-Chem Global (Private) Limited, Lahore commenced commercial production of Phthalic Anhydride. Currently, the domestic Phthalic Anhydride manufacturing industry is comprised of these two units, with a total combined installed production capacity of 60,000 MT per annum.

8. Standing of the Application

8.1 The application fulfils the requirements of Section 24 of the Act, which enjoins upon the Commission to assess the standing of the domestic industry based on the degree of support for or opposition to the application expressed by the domestic producers of the domestic like product.

8.2 In terms of Section 24(1) of the Act, an application shall be considered to have been made by or on behalf of the domestic industry only if it is supported by those domestic producers whose collective output constitutes more than fifty percent of the total production of a domestic like product produced by that portion of the domestic industry expressing either support for or opposition to the application. Furthermore, Section 24(2) of the Act provides that no investigation shall be initiated when domestic producers expressly supporting an application account for less than twenty-five percent of the total production of domestic like products produced by the domestic industry.

8.3 The application has been filed by the M/s Nimir Chemicals Pakistan Limited, Lahore and M/s PA-Chem Global Private Limited, Lahore (the "Applicants"), who are the only domestic producers of Phthalic Anhydride in Pakistan. The Applicants represent 100 percent of total production of domestic like product produced by the domestic industry. Therefore, the application fulfills the standing requirements of Section 24 of the Act. The following table shows share in production of each unit of the domestic industry during the period from January 01, 2025, to December 31, 2025:

Table-II
Standing of Application

Sr. No.	Unit Name	% Share in total production	Status
(1)	(2)	(3)	(4)
1	M/s Nimir Chemicals Pakistan Limited	65.44	Applicant
2	M/s PA-Chem Global private Limited	34.56	Applicant
	Grand Total	100	

Source: The Applicants

9. Initiation of Sunset Review

9.1 Upon examination of the application, the Commission established that it met the requirements of Section 58 of the Act. Therefore, the Commission initiated sunset review to determine whether there is likelihood of continuation or recurrence of dumping of Phthalic Anhydride from Exporting Countries and injury to the domestic industry.

9.2 In terms of Section 27 of the Act, the Commission issued a notice of initiation of the Sunset Review of anti-dumping duty imposed on dumped imports of Phthalic Anhydride from the Exporting Countries, which was published in the official Gazette of Pakistan and in two widely circulated national newspapers on May 23, 2026.

9.3 The Commission issued copies of the Notice of Initiation to the Applicants on May 25, 2026, and to the importers along with the Importers' Questionnaire on the same date, in accordance with the requirements of Section 27 of the Act.

9.4 The Commission also sent notice of initiation, copy of full text of the written application (non-confidential version) and Exporter's/ foreign Producer Questionnaire to all exporters/producers of Phthalic Anhydride in Exporting Countries whose complete addresses were available with the Commission and to the Embassies of the Exporting Countries in Islamabad with a request to forward it to all exporters /producers of Phthalic Anhydride in Exporting Countries involved in production, sale and/or export of product under review in accordance with Section 28 of the Act, on May 25, 2026.

10. The product under review and the domestic like product

10.1 The product under review

10.1.1 The product under review is Phthalic Anhydride (hereinafter referred to as "Phthalic Anhydride" or "product under review") classified under Pakistan Customs Tariff ("PCT") No. 2917.3500. Phthalic Anhydride is an organic compound in white crystalline form, available in solid state, white flakes, with mild Oduor, slightly soluble in ether and hot water. It is obtained by catalytic oxidation process from Ortho xylene or Naphthalene.

10.2.2 It is used in the manufacturing of Polyester Resins, Alkyd Resin, Plasticizers, certain dyes, and insecticides etc. It is also used in production of Di-octyl- Phthalate (DOP), Di Butyl Phthalate (DBP), Viscosity Reducer II (VR-II), Di-octyl Adipate (DOA), dyestuffs and other products.

10.2.3 The following table shows the tariff structure applicable to the import of Phthalic Anhydride during the last three years:

Table-III
Tariff Structure of Phthalic Anhydride (%)

Year	Customs Duty Rate	Additional customs Duty	Regulatory Duty	FTA/PTAs
2023-24	11	2	0	SAFTA=5; LK_FTA Conc.=100%
2024-25	11	2	0	
2025-26	10	0	0	

Source: Pakistan Customs Tariff

10.2 Domestic like product

The domestic like product produced by the domestic industry is Phthalic Anhydride (hereinafter referred to as "Phthalic Anhydride" or "domestic like product"). Its specifications, uses, and classification is the same as the product under review. Further, the

Commission, in its original investigation, had determined that the investigated product and the domestic like product are like products.

11. **Period of Review**

The Period of Review ("POR") for this sunset review is January 01, 2023, to December 31, 2025. The Applicants have submitted information and evidence for this period to determine likely recurrence or continuation of dumping of the product under review and likely recurrence or continuation of material injury to the domestic industry in accordance with the provisions of Section 58 of the Act.

12. **Information/Data Gathering**

12.1 The Commission sent questionnaires on May 25, 2026, to all known exporters/ producers of Phthalic Anhydride in Exporting Countries, whose addresses were available with the Commission, asking them to respond within 37 days of the dispatch of the questionnaires. A copy of the questionnaire was also sent to the Embassies of Exporting Countries in Islamabad on May 25, 2026, with a request to forward it to all known exporters/ producers Phthalic Anhydride in Exporting Countries.

12.2 No response from any exporters/foreign producers was received within the prescribed time. Therefore, reminders were issued to the exporters/foreign producers and importers on July 09, 2026, explaining that, if no response on the questionnaire is submitted, the Commission will be constrained to make likely continuation or recurrence of dumping of the product under review on the basis of "best information available" including those contained in the application submitted by the Applicant. However, none of the exporters/ foreign producers from Exporting Countries or importers have responded to the Commission and did not provide requisite information.

12.3 Questionnaires were also sent to known importers of Phthalic Anhydride on May 25, 2026, requesting them to respond within 37 days of the dispatch of the questionnaire. Pak Button Industries Private limited, Power Chemical Industries Limited, Shalimar Resin Industries (Pvt.) Limited, Al Rehman Chemical Industries (Pvt.) Limited and Ranyal Industries (Pvt.) Limited, provided some data on importers questionnaire.

12.4 The Commission has access to the import statistics of Web Based One Customs ("WeBOC") the data processing arm of the Federal Board of Revenue, Government of Pakistan. For the purpose of this review the Commission has also used import data obtained from WeBOC's database in addition to the information provided by the Applicant. In addition to this, the Commission has also obtained certain information from publicly available sources.

13. **Views, Comments and Hearing**

13.1 All interested parties known to the Commission were invited for their views/comments and to submit information and documents (if any) with regard to this sunset review. In response, the Commission received views/comments from Pak Button

Industries Private limited, Qaiser LG Petrochemicals Private Limited, Power Chemical Industries Limited and Ministry of Economic Development of the Russian Federation.

13.2 Interested parties were required to request a hearing in this review within 45 days of publication of the notice of initiation. As the Commission did not receive any such request, no hearing was held.

14. Verification of the Information

14.1 In terms of Section 23, 32(4) and 35 of the Act and Rule 11 of the Rules, the Commission, during the course of the investigation /review, satisfies the accuracy of information supplied by the interested parties to the extent possible.

14.2 In order to verify the information/data provided by the Applicants and to obtain further information (if any), the officers of the Commission conducted on-the-spot verification at the office/plant of the Applicants from July 20-21, 2026 (M/s Nimir Chemicals Pakistan Limited, Lahore) and from July 22-23, 2026 (M/s PA-Chem Global Private Limited, Lahore). Non-confidential summary of the verification reports is placed in the Public File maintained under Rule 7 of the Rules.

15. Confidentiality

15.1 In terms of Section 31 of the Act, the Commission shall keep confidential any information submitted to it, which is by nature confidential, or determined by the Commission to be of confidential nature for any other reason or provided as confidential by parties to an investigation upon good cause shown, to be kept confidential.

15.2 The Applicants and other interested parties have requested to keep confidential the information, which is by nature confidential in terms of Section 31 of the Act. This information includes data relating to sales, sale prices, cost to make and sell, inventories, production, profit/(loss), return on investment, cash flow, growth, investment, salaries and wages, number of employees and capacity etc.

15.3 Pursuant to requests made by the Applicants and other interested parties, to treat certain information as confidential, the Commission has determined confidentiality in light of Section 31 of the Act and for the reasons that disclosure of such information may be of significant competitive advantage to the competitor, or because its disclosure would have a significant adverse effect upon the interested parties providing such information. However, in terms of Section 31(5), non-confidential summaries of all confidential information, which provide reasonable understanding of the substance, have been placed in the public file.

16. Public File

The Commission, in accordance with Rule 7 of the Rules, has established and maintained a public file of this sunset review at its office. This file remains available to the interested parties for review and copying from Monday to Thursday between 1100 hours to 1300 hours throughout the review investigation. This file contains non-confidential versions of the application, submissions, notices, on-the-spot investigation reports, correspondence, and other documents for disclosure to the interested parties.

17. Evidence/Information for Likelihood of Continuation or Recurrence of Dumping of the Product Under Review

17.1 In terms of Section 58(3) of the Act, the Applicant is required to provide evidence of the likelihood of continuation or recurrence of dumping. In the case of a sunset review, in terms of Rule 40 of the Rules, the Commission is required to determine the likelihood of continuation or recurrence of dumping of the product under review on the following basis:

(a) whether exporters/foreign producers stopped or continued exporting to Pakistan the product under review after imposition of anti-dumping duties;

(b) calculations of likely dumping margins for exporters or producers from the Exporting Countries;

(c) the past and likely future performance of the exporters, foreign producers, including production, capacity utilization, the potential to extend production facilities, costs, sales volumes, prices, inventories, market share, exports, exportable surplus, profits, etc.;

(d) whether exporters/foreign producers have developed other export markets after the imposition of the anti-dumping duties on dumped import of Phthalic Anhydride;

(e) trade remedial actions taken by other countries on the exports of the product under review and whether such actions are likely to cause a diversion of imports into Pakistan; and

(f) Conditions of competition with non-dumped imports of the like product.

17.2 Whether exporters/foreign producers stopped or continued exporting to Pakistan the product under review after imposition of anti-dumping duties.

The following table shows the volume of dumped imports from the Exporting Countries and imports from sources other than the dumped sources after the imposition of anti-dumping duties:

Table-IV
Imports of Phthalic Anhydride (Volume)

Year/Period	**Dumped Imports from the Exporting Countries**	**Imports from Non-Dumped Sources**	**Total Imports**	**Dumped imports as % of total imports**
(1)	(2)	(3)	(4)	(5)
Jul 18-Jun 19*	91	9	100	91
Jan-Dec 2023	46	29	75	61
Jan-Dec 2024	94	1	95	99
Jan-Dec 2025	114	3	118	97

*POI of original investigation. Source: WeBOC and the Applicants
Note: To keep confidentiality, actual figures are indexed by taking figures of total imports during the POI equal to 100

17.3 Calculation of Likely Dumping Margin for Exporting Countries

17.3.1 As stated earlier (paragraph 12 supra), the Commission sent questionnaires to exporters/producers whose complete addresses were available with it. A copy of the questionnaire was also provided to the Embassies of the Exporting Countries in Islamabad, with a request to forward it to all exporters and foreign producers of the product under review, inviting them to submit the required information to the Commission. However, the Commission did not receive any response to the questionnaire from any exporter/foreign producer of the product under review.

17.3.2 Accordingly, the likely determination regarding dumping margins shall not be made as no exporter/producer cooperated in this review investigation.

17.4 The past and likely future performance of the exporters, foreign producers, including production, capacity utilization, the potential to extend production facilities, costs, sales volumes, prices, inventories, market share, exports, exportable surplus, profits, etc.

17.4.1 As stated earlier, no exporter/foreign producer provided any information in this review, therefore, a country-wide performance of the Exporting Countries for the product under review will be assessed on the basis of following best information available with the Commission.

17.4.2 **China**

17.4.2.1 According to "S&P Global Chemical Economics Handbook — Ortho-Xylene" dated December 2024:

> *"Global Ortho xylene (OX) production is relatively concentrated, with the top producers, mainly large oil and petrochemical companies, accounting for a significant share of global capacity. OX is primarily used as a feedstock for Phthalic Anhydride (PA). However, its demand has weakened in recent years due to the increasing use of alternative feedstock (naphthalene), particularly in China, along with regulatory pressures on phthalate-based products. Despite subdued demand, global OX capacity is expected to expand in the coming years, especially in Southern Asia, alongside increased production in China leading to greater self-sufficiency".*

17.4.2.2 According to the report of Echemi dated February 15, 2022:

"In the next five years, the capacity of phthalic anhydride products will be expanded, and the new capacity will be mainly concentrated in east China, South China and North China. The integrated development of upstream and downstream and the supporting industrial chain are the fundamental reasons for its expansion.

By 2021, the capacity of north China will account for 39.39%, east China 33.81%, Northeast China 9.71%, central China 8.81%, South China 5.76% and Southwest China 2.52%.

It is estimated that by 2023, south China will add 260,000 tons of phthalic anhydride, East China will add 50,000 tons of phthalic anhydride, southwest China will add 50,000 tons of phthalic anhydride, and northeast China will add 70,000 tons of phthalic anhydride. It is estimated that the proportion of north China's production capacity will decrease to 35.61%, East China 30%, South China 12.73%, northeast China 10.3%. Central China's capacity is 7.42% and southwest China's 3.64%".

17.4.2.3 According to the BIXISM's report May 15, 2025:

"The global market demand for phthalic anhydride is expected to exceed 12 million tons. The global demand for phthalic anhydride is expected to continue to grow. The "2025-2030 Global and China Phthalic Anhydride Industry Market Status Survey and Development Prospects Analysis Report" predicts that the global demand in 2025 will exceed 12 million tons, with an annual compound growth rate of about 5%.-- Analysis of the development trend of the phthalic anhydride market shows that in 2023, China's total phthalic anhydride trade volume will increase by 55.7% year-on-year; the total trade amount will increase by US$54.01 million year-on-year, an increase of 58.3%. Among them, the import volume in 2023 will decrease by 84.8% year-on-year; the import amount will decrease by 79.3% year-on-year. The export volume will increase by 140.0%; the export amount will increase by 125.3%. In 2023, the first import method of phthalic anhydride is general trade, accounting for 98.2%; the second is processing trade with imported materials, accounting for 0.8%. The main sources of phthalic anhydride imports are South Korea, Taiwan, China, Japan and other countries or regions. Among them, South Korea's supply accounts for 46.6% of the total import volume; Taiwan's supply accounts for 33.4%; Japan's supply accounts for 18.6%."

17.4.3 **Chinese Taipei**

According to the report of Market Growth Reports January 2026.

"Nan Ya Plastics introduced a high-purity phthalic anhydride product line in 2023 targeting the electronics industry. Nan Ya Plastics, based in Taiwan, produced over 400,000 metric tons of phthalic anhydride in 2024. The company supplies downstream applications in both domestic and international markets with a focus

on plasticizer and resin segments. The global Phthalic Anhydride Market size was valued at USD 12716.56 million in 2025. The market is projected to be worth USD 13250.66 million in 2026 and reach USD 19192.65 million by 2035, exhibiting a CAGR of 4.2% during the forecast period".

17.4.4 **South Korea**

17.4.4.1 According to the report of Global News Wire dated April 03, 2026:

"In October 2024, Aekyung Petrochemical Co., Ltd. expanded phthalic anhydride production capacity at its Ulsan manufacturing complex by approximately 30,000 metric tons per year, targeting growing PVC plasticizer demand across Southeast Asian markets and strengthening supply reliability for domestic resin customers".

17.4.4.2 According to the report of Market Growth Reports

" In 2024, South Korea increased its annual production by 150,000 metric tons, while Taiwan expanded by 90,000 metric tons. Asia-Pacific dominated the market with over 3.1 million metric tons of consumption in 2024. China leads the region with over 2.1 million metric tons, followed by India at 300,000 metric tons. Expanding infrastructure, high plasticizer demand, and increased UPR production are key drivers. South Korea and Taiwan also reported annual capacity additions of 150,000 and 90,000 metric tons respectively.

The increase in maritime exports of phthalic anhydride from Asia to Europe exceeded 800,000 metric tons in 2024, and new port infrastructure in Vietnam and South Korea is expected to double export capacity by 2026. Additionally, long-term strategic partnerships between raw material suppliers and chemical producers have increased by 28% from 2022 to 2024, offering stable pricing and consistent supply chains".

17.4.5 **Russia**

17.4.5.1 According to the report of a business intelligence firm Datavagvanik in 2025:

"The phthalic anhydride derivatives market in Russia has witnessed steady growth over the past decade. The demand for these derivatives is driven by robust developments in the construction and automotive industries, both of which require products such as plasticizers and resins for various applications. The market size in Russia is expected to grow at a compounded annual growth rate (CAGR) of approximately 4-5% over the next five years, fueled by an increasing need for high-quality coatings, adhesives, and plastics".

17.4.5.2 According the report of Chemical Market Intelligence CIREC, June 2024.

"Phthalic anhydride production in Russia totalled 23,515 tons in the first quarter this year i.e., 2024 which is higher by around 3,000 tons over the same period in 2023. Kamteks-Khimprom at Perm is the largest producer followed by Gazprom

neftekhim Salavat, and together these two plants produced 19,298 tons in the first three months in 2024".

17.5 Whether exporters of the Exporting Country have developed other export markets after the imposition of anti-dumping duties

17.5.1 To analyze the impact of anti-dumping duties on the exporters/producers of Phthalic Anhydride from the Exporting Countries and to assess whether there is a change in the pattern of their exports, the trend of exports of the Exporting Countries will be analyzed. For this purpose, the information available at the International Trade Centre (www.trademap.org) will be utilized. The following table shows major exports destinations of the Exporting Countries:

Table-V
Major Export Markets of Phthalic Anhydride from the Exporting Countries (MT)

Exporting Countries	Destination	2019	Destination	2025
China	India	14,449	Vietnam	28,089
	Vietnam	3,812	UAE	16,173
	Pakistan	3,511	India	14,535
	Indonesia	2,835	Saudi Arabia	10,746
	Myanmar	2,313	Pakistan	8,459
	Others	18,212	Others	81,390
	Total	**45,132**	**Total**	**159,392**
	Destination	**2019**	**Destination**	**2025**
South Korea	India	82,546	USA	18,928
	Vietnam	11,058	Poland	16,204
	UAE	10,657	Vietnam	7,972
	Indonesia	8,994	Thailand	7,294
	Pakistan	1,338	Indonesia	7,087
	Others	69,799	Others	33,191
	Total	**184,392**	**Total**	**90,676**
	Destination	**2019**	**Destination**	**2025**
Russia	Egypt	7,811	Türkiye	43,877
	Brazil	7,676	Uzbekistan	1,500
	India	6,266	India	963
	Poland	5,880	Kazakhstan	409
	Türkiye	3,086	Egypt	351
	Others	27,574	Others	460
	Total	**58,293**	**Total**	**47,560**
	Destination	**2019**	**Destination**	**2025**
Taiwan	India	22,896	India	41,018
	Malaysia	18,725	Saudi Arabia	15,726
	Saudi Arabia	16,452	Malaysia	13,752
	Indonesia	6,561	UAE	6,796

	Pakistan	1,800	Vietnam	6,338
	Others	33,710	Others	25,828
	Total	**100,144**	**Total**	**109,458**

Source: Trade Map

17.6 Trade remedial actions taken by other countries on the exports of the product under review and whether such actions are likely to cause a diversion of imports into Pakistan

To assess the likely recurrence or continuation of dumping of the product under review, the Commission will analyze trade remedial actions taken by other countries against exports of Phthalic Anhydride from the Exporting Countries. The exports of Phthalic Anhydride from the Exporting Countries are subject to the following anti-dumping measures by different WTO member countries:

Table-VI
Anti-Dumping Duties on Exports of Phthalic Anhydride from the Exporting Countries

Importing Country	Trade Remedy Measure	Exporting Country	Anti-Dumping Duties	Date of Imposition
(1)	**(2)**	**(3)**	**(4)**	**(5)**
India	Anti-Dumping	China	40.01 $/MT	August 09, 2021
India	Anti-Dumping	Korea	41.64 to 140.17 $/MT	August 09, 2021
Brazil	Anti-Dumping	China	62.65 to 773.79 $/MT	July 28, 2025
Brazil	Anti-Dumping	Russia	559.42 $/MT	December 12, 2021

Source: WTO

17.7 Conditions of competition with non-dumped imports of the like product:

The information relating to the imports and landed cost of Phthalic Anhydride from the Exporting Countries and other sources during POI of original investigation and POR is given below in the table:

Table-VII
Quantity of Imports and Prices of Phthalic Anhydride

Period	Imports from:			Landed Cost from:		
	Dumped Source (Volume)	Non-Dumped Sources (Volume)	Total Imports (Volume)	Dumped Source without ADD (per MT)	Dumped Source with ADD (per MT)	Non-Dumped Sources (per MT)
(1)	(2)	(3)	(4)	(5)	(6)	(7)
Jul 18-Jun 19*	91	9	100	100	-	131
Jan-Dec 2023	46	29	75	211	235	185
Jan-Dec 2024	94	1	95	203	223	144
Jan-Dec 2025	114	3	118	191	210	185

*POI of original investigation. Source: WeBOC and the Applicants

Note: To keep confidentiality, actual figures are indexed by taking figures of total imports and landed cost of dumped imports without ADD during the POI equal to 100

18. Likely Recurrence or Continuation of Material Injury to the Domestic Industry

18.1 Likely recurrence and continuation of injury to the domestic industry will be determined in accordance with Rule 41 of the Rules and other relevant provisions of the Act. The Commission will take into account relevant factors in order to determine likely continuation or recurrence of injury to the domestic industry. To determine likelihood of continuation or recurrence of injury to the domestic industry, the Commission, *inter alia,* will consider the following factors:

i. Likely change in volume of imports of the product under review if anti-dumping duty is terminated;

ii. Likely impact of imports of the product under review on prices of the domestic like product with and without anti-dumping duty; and

iii. Consequent likely impact on the domestic industry, which includes likely and potential decline in sales, profits, output, market share, productivity, return on investment, capacity utilization and likely negative effects on: cash flow, inventories, employment, wages, growth, ability to raise capital or investments.

18.2 As stated earlier, the domestic industry consists of two units i.e., M/s Nimir Chemicals Pakistan Limited and M/s PA-Chem Global (Private) Limited (Applicants), therefore, the likelihood of continuation or recurrence of injury to the domestic industry will be inferred from the Applicant's information.

18.3 Volume of Imports of Phthalic Anhydride

The information on volume of imports of Phthalic Anhydride from dumped sources and other sources during the period of last year of original investigation and POR is given in Table-IV supra.

18.4 Domestic Industry's Production, Sales and Capacity Utilization

The information on domestic industry's production, sales and capacity utilization of the domestic like product during the original POI and POR is provided in the following table:

Table-VIII
Production, Sales and Capacity Utilization (Volume)

Year/Period	Installed Capacity	Quantity Produced	Sales		Capacity Utilization (%)
			Domestic**	Export	
Jul 18-Jun 19*	100	74	53	--	74.13
Jan-Dec 2023	200	79	67	5	39.42
Jan-Dec 2024	200	65	70	2	32.63
Jan-Dec 2025	200	66	69	--	33.12

* POI of Original Investigation
** Domestic Sales of Applicants (including internal consumption) during the current POR
Source: the Applicants
Note: To keep confidentiality, actual figures are indexed by taking figures of installed capacity during the POI equal to 100

18.5 Price, Cost to Make & Sell of the Domestic Like Product and Landed Cost of the Imported Phthalic Anhydride

Ex-factory price and cost to make and sell of the domestic like product and landed cost of the imported Phthalic Anhydride for the POI, and POR is provided in the following table:

Table-IX
Price, Cost to Make & Sell and Landed Cost (per MT)

Year	Cost to make & sell	Domestic product's price	Landed cost of Dumped Imports	
			Without ADD	With ADD
(1)	(2)	(3)	(4)	(5)
Jul 18-Jun 19*	100	104	100	--
Jan-Dec 2023	245	250	210	234
Jan-Dec 2024	254	241	202	222
Jan-Dec 2025	225	212	190	209

*POI of Original Investigation.
Source: the Applicants, and WEBOC
Note: To keep confidentiality, the actual figures are indexed by taking figures of cost to make & sell during the POI equal to 100

18.6 Profits/Loss, Cash Flows and Return on Investment

Applicants' profits/(loss) of Phthalic Anhydride, cash flows and return on investment ("ROI") for their entire operations for the original POI and POR is provided in the following table:

Table-X
Profit/(Loss), Cash Flows and ROI

Year	Net Profit/(Loss) (Value)	Cash Flows (Value)	ROI (%)
(1)	(2)	(3)	(4)
Jul 18-Jun 19*	100	(75)	6.29
Jan-Dec 2023	110	2,694	43.95
Jan-Dec 2024	(277)	1,599	14.59
Jan-Dec 2025	(264)	(39)	(9.14)

* POI of Original Investigation.
Source: the Applicants
Note: To keep confidentiality, the actual figures are indexed by taking figures of profit/(loss) during POI (2008-09) equal to 100

18.7 Inventories of the domestic like product

Inventory position of the domestic like product during the POI and POR is provided in the following table:

Table-XI
Opening and closing inventory (Volume)

Year	Opening inventory	Closing inventory
(1)	(2)	(3)
Jul 18-Jun 19*	100	79
Jan-Dec 2023	1,311	2,061
Jan-Dec 2024	2,061	1,379
Jan-Dec 2025	1,379	1,073

* POI of Original Investigation
Source: the Applicant
Note: To keep confidentiality, the actual figures are indexed by taking figures of opening inventory during the POI equal to 100

18.8 Employment, Productivity and Wages

Information on employment, productivity and wages of the Applicants during the POI and POR is provided in the following table:

Table-XII
Employment, Salaries/Wages and Productivity

Year	Number of Employees	Salaries & Wages	Productivity per worker
(1)	(2)	(3)	(5)
Jul 18-Jun 19*	100	100	100
Jan-Dec 2023	208	160	51
Jan-Dec 2024	198	158	44
Jan-Dec 2025	151	133	59

* POI of Original Investigation
Source: the Applicants
Note: To keep confidentiality, actual figures are indexed by taking respective figures during POI (2008-09) equal to 100

19. In accordance of Rule 15(2) of the rules, interested parties can submit comments (if any), on above mentioned facts in writing not later than fifteen (15) days of issuance of this statement.

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檔　　號：
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主旨：有關巴基斯坦對自我國等4國進口之「苯二甲酸酐」（Phthalic Anhydride）反傾銷落日複查案，檢送巴國公布之「基礎事實報告」（Statement of Essential Facts，SEF），請查照。

說明：

一、依據巴國駐WTO代表團轉巴國國家關稅委員會（National Tariff Commission，NTC）本（2026）年8月19日致本團之節略（如附件1）及旨案報告（如附件2）辦理。相關文號：本團本年5月27日世貿字第1154340493號函。

二、旨揭SEF援引Market Growth Reports之報告指出，我國南亞塑膠於2023年推出高純度之鄰苯二甲酸酐生產線，該公司2024年生產超過40萬噸之鄰苯二甲酸酐（詳參SEF第17.4.3段）。我國在2024年新增9萬噸產能（詳參SEF第17.4.4.2段）。另我國總出口量由2019年約10萬噸增至2025年近11萬噸，且出口主力轉往印度、越南等地，2025年對巴基斯坦之出口已不再位居前列（詳參SEF第17.5節Table-V）。

三、依據WTO反傾銷協定第6.9條及巴國反傾銷規則第15(1)條，NTC在對複查做出最終裁定之至少30天前，應告知所有利害關係人其決定是否採行最終措施所據以認定之基礎

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事實。本案我國相關利益方若欲提出書面評論，應於本年8月19日起之15日內為之。

正本：經濟部國際貿易署

副本：行政院經貿談判辦公室、外交部(均含附件)

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