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**F. No. 06/32/2025-DGTR  
Government of India  
Ministry of Commerce & Industry  
Department of Commerce  
(Directorate General of Trade Remedies)  
4<sup>th</sup> Floor, Jeevan Tara Building,  
5, Parliament Street, New Delhi -110001**

Date: 27.09.2025

**INITIATION NOTIFICATION**

**Case No. AD (OI) – 29/2025**

**Subject - Initiation of anti-dumping investigation into imports of BIS (2,2,6,6-Tetramethyl-4-Piperidyl) Sebacate (UV 770) originating in or exported from the European Union and China PR**

1. Having regards to the Customs Tariff Act 1975, as amended from time to time (hereinafter also referred to as the “Act”) and the Customs Tariff (Identification, Assessment and Collection of Anti-dumping Duty on Dumped Articles and for Determination of Injury) Rules, 1995 thereof, as amended from time to time (hereinafter also referred to as the “Rules” or “AD Rules”), Clean Science and Technology Limited (CSTL) and Clean Fino-Chem Limited (CFCL) (hereinafter also referred to as the “applicants”) have filed an application before the Designated Authority (hereinafter referred to as the “Authority”) for the initiation of an anti-dumping investigation concerning the imports of Bis (2,2,6,6-Tetramethyl-4-Piperidyl) (hereinafter referred to as “subject goods” or “product under consideration”) originating in or exported from China PR and the European Union (hereinafter referred to as “subject countries”)
2. The applicants have alleged that dumping of imports of the subject goods originating in or exported from the subject countries has materially retarded the establishment of the domestic industry. Accordingly, the applicants have requested for the imposition of anti-dumping duty on the imports of the subject goods from the subject countries.

**A. PRODUCT UNDER CONSIDERATION**

3. The product under consideration is Bis (2,2,6,6-Tetramethyl-4-piperidyl) Sebacate, also known as UV 770 or Hindered Amines Light Stabilizer 770 (HALS 770). The product under consideration is a low molecular weight organic compound with chemical formula  $C_{28}H_{52}N_2O_4$ , having CAS number 52829-07-9. It is colourless to pale yellow in colour.

4. The product under consideration is a UV light stabiliser, used to prevent degradation of polymers from exposure to ultraviolet radiation or sunlight, which result in increased life of products. The product under consideration is also referred to as UV Stabilizer 770 or Light Stabilizer 770, and is available under multiple brand names, including but not limited to Tinuvin 770, Sabostab 77, Riasorb 770 and Sunovin 770.
5. The subject goods are dispersed in polyethylene or polypropylene carrier resins which may be used in masterbatches or other compounds. Subject goods are used to produce Flexible Intermediate Bulk Container (FIBC) bags. It is also used on high surface areas such as tapes and films and polypropylene/ polymer mouldings for making car bumpers and car door panels.
6. The product under consideration is classified under Chapter 29 and Chapter 38 of Schedule I of the Customs Tariff Act, 1975, and are imported under the HS Codes 2933 39 90 and 3812 39 90. The customs classification is only indicative and is not binding on the scope of the present investigation.
7. The interested parties in the subject investigation may provide their comments on the PUC/PCN methodology, if any, within 15 days from the date of initiation of this investigation.

**B. LIKE ARTICLE**

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

**C. DOMESTIC INDUSTRY AND STANDING**

9. The application has been filed by Clean Science and Technology Limited and Clean Fino-chem Limited. The applicants have submitted that there are no other domestic producers of the like article in the country. The applicants have also submitted that they are not related to exporters of subject goods in the subject countries or importers of product under consideration in India. Further, the applicants have not imported the product under consideration from the subject countries during the period of investigation.
10. In view of the above and after examination of the application filed by the applicants, the Authority prima facie notes that the applicants account for major proportion of total



Indian production and constitute 'domestic industry' within the meaning of Rule 2(b) and the application satisfies the criteria of standing in terms of Rule 5(3) of the Anti-Dumping Rules.

#### **D. SUBJECT COUNTRIES**

11. The application has been filed in respect of dumped imports of the product under consideration from the European Union ("EU") and the People's Republic of China ("China PR").

#### **E. PERIOD OF INVESTIGATION**

12. The applicants have proposed 1<sup>st</sup> April 2024 to 31<sup>st</sup> March 2025 as the period of investigation. The applicants have submitted that production for like article has commenced from 2022-23 and have provided information for the period 2022-23, 2023-24 and the period of investigation for the purpose of injury analysis. However, in accordance with the provisions of Rule 5(3A) of the Rules, the period of investigation considered by the Authority is from 1<sup>st</sup> April 2024 to 31<sup>st</sup> March 2025. The injury period covers 2021-22, 2022-23, 2023-24 and the period of investigation.

#### **F. BASIS OF ALLEGED DUMPING**

##### Normal value for China PR

13. The applicants have claimed that China PR must be treated as a non-market economy and the Chinese producers should be directed to demonstrate that market economy conditions prevail in the industry producing the subject goods as per Para 8(3) of Annexure-I of the Rules. The applicants have claimed that, unless producers from China PR show that market economy conditions prevail, normal value should be determined in accordance with para 7 of Annexure I of the Rules.
14. Therefore, for the purpose of the present initiation, the Authority has considered China PR to be a non-market economy and determined normal value for China PR based on price payable in India. The normal value has been constructed based on estimated cost of production of the applicants, duly adjusted for selling, general and administrative expenses with reasonable profits.

##### Normal Value for European Union

15. The applicants have claimed that it did not have access to information regarding the domestic selling price or actual cost of production in the European Union.
16. The applicants have determined normal value based on the cost of production of producers in one of the countries in EU, that is, Germany, based on information

reasonably available with them. For this purpose, the applicants have relied on import price of Sebacic acid and the power rates applicable in Germany which is one of the countries in the EU, as per publicly available information. The applicants have considered consumption norms for power based on consumption norm of the domestic industry. The cost of other raw material and utilities has been considered based on the cost of the domestic industry. An addition of selling, general and administrative expenses and reasonable profits have been made to the cost determined.

17. The normal value claimed is considered appropriate for the purpose of initiation of the present investigation.

#### Export Price

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

#### Dumping margin

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

### **G. INJURY AND CAUSAL LINK**

20. Information furnished by the applicants has been considered for assessment of injury to the domestic industry. The applicants have furnished prima facie evidence establishing that the subject imports have materially retarded the establishment of the domestic industry in India. There has been a significant increase in subject imports in absolute terms. It has been submitted that the subject imports have declined in relative terms on account of commencement of production in India. It is noted that the landed price is below the cost of sales of the domestic industry. It has also been submitted that subject imports have suppressed the prices of the domestic industry and forced it to sell at losses. The price undercutting is negative. It has been claimed by the domestic industry that this is due to the inability of the domestic industry to charge a price higher than landed price for attracting customers as a new producer in the market. The domestic industry has not been able to achieve its projected sales prices, capacities and sales volume. As result, the domestic industry is suffering due to underutilized capacities. Further, it has been claimed that despite having capacities to cater to Indian demand, the market share of the domestic



industry has been stagnated. The domestic industry has suffered from losses and cash losses throughout the injury period and is unable to break even in the period of investigation. The domestic industry has incurred negative returns on its investments and negative growth in its profitability parameters. There is sufficient *prima facie* evidence of injury being caused to the domestic industry in the form of material retardation by the dumped imports from the subject countries, justifying initiation of an anti-dumping investigation.

#### **H. INITIATION OF ANTI-DUMPING INVESTIGATION**

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

#### **I. PROCEDURE**

22. Principles as given in Rule 6 of the Rules shall be followed for the present investigation.

#### **J. SUBMISSION OF INFORMATION**

23. All communication should be sent to the Designated Authority via email at email addresses [jd11-dgtr@gov.in](mailto:jd11-dgtr@gov.in) and [dir16-dgtr@gov.in](mailto:dir16-dgtr@gov.in) with a copy to [adv13-dgtr@gov.in](mailto:adv13-dgtr@gov.in) and [consultant-dgtr@nic.in](mailto:consultant-dgtr@nic.in). It must be ensured that the narrative part of the submission is in searchable PDF/MS-Word format and data files are in MS-Excel format.
24. The known producers/exporters in the subject countries, the Government of the subject countries through its embassies in India, and the importers and users in India who are known to be associated with the subject goods are being informed separately to enable them to file all relevant information within the time limits mentioned in this initiation notification. All such information must be filed in the form and manner as prescribed by this initiation notification, the Rules, and the applicable trade notices issued by the Authority.
25. Any other interested party may also make a submission relevant to the present investigation in the form and manner as prescribed by this initiation notification, the

Rules, and the applicable trade notices issued by the Authority within the time limits mentioned in this initiation notification.

26. Any party making any confidential submission before the Authority is required to make a non-confidential version of the same available to the other interested parties.
27. Interested parties are further advised to keep a regular watch on the official website of the Authority <http://www.dgtr.gov.in/> for any updated information with respect to this investigation.

#### **K. TIME LIMIT**

28. Any information relating to the present investigation should be sent to the Designated Authority via email at email address [jd11-dgtr@gov.in](mailto:jd11-dgtr@gov.in) and [dir16-dgtr@gov.in](mailto:dir16-dgtr@gov.in) with a copy to [adv13-dgtr@gov.in](mailto:adv13-dgtr@gov.in) and [consultant-dgtr@nic.in](mailto:consultant-dgtr@nic.in) within thirty days (30 days) from the date on which the non-confidential version of the documents filed by the domestic industry would be circulated by the Designated Authority or transmitted to the appropriate diplomatic representative of the exporting countries as per Rule 6(4) of the Rules. If no information is received within the stipulated time limit or the information received is incomplete, the Authority may record its findings based on the facts available on record and in accordance with the Rules.
29. All the interested parties are hereby advised to intimate their interest (including the nature of interest) in the present investigation and file their questionnaire response/submissions within the above time limit.
30. Where an interested party seeks additional time for filing of submissions, it must demonstrate sufficient cause for such extension in terms of Rule 6(4) of the AD Rules and such request must come within the time stipulated in this notification.

#### **L. SUBMISSION OF INFORMATION ON CONFIDENTIAL BASIS**

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



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

#### **M. INSPECTION OF PUBLIC FILE**

40. A list of registered interested parties will be uploaded on the DGTR's website along with the request therein to all of them to email the non-confidential version of their submissions/response/information to all other interested parties. Failure to circulate non-confidential version of submissions/response/information might lead to consideration of an interested party as non-cooperative.

**N. NON-COOPERATION**

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



**(Siddharth Mahajan)**  
**Designated Authority**