**CASE No. AD (OI) – 41/2025**

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**F. No. 6/46/2025-DGTR**
**Government of India**
**Department of Commerce**
**Ministry of Commerce & Industry**
**(Directorate General of Trade Remedies)**
**4th Floor, Jeevan Tara Building, Parliament Street, New Delhi – 110001**

**Dated: 25.09.2026**

**FINAL FINDINGS**

**CASE No. AD (OI) – 41/2025**

**Subject: Anti-dumping investigation concerning imports of "Printed Circuit Board Tools" originating in or exported from China PR.**

## A. BACKGROUND

**F. No. 6/46/2025-DGTR** – Having regard 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 'AD Rules' or the 'Rules');

1. The Designated Authority (hereinafter referred to as "Authority") received an application filed on behalf of the domestic industry by Ind-Sphinx Precision Limited (hereinafter referred to as the "applicant" or the "domestic industry") seeking initiation of an anti-dumping investigation concerning imports of Printed Circuit Board Tools (hereinafter referred to as the "product under consideration", "PUC", "PCB Tools" or "subject goods") originating in or exported from China PR (hereinafter referred to as the "subject country", with imports of the product under consideration from the subject country referred to as "subject imports").

2. The Authority examined the application and found prima facie evidence that exports from the subject country were at dumped prices and that there was consequent injury to the domestic industry. Accordingly, pursuant to Rules 5 and 6 of the Rules, vide Notification F. No. 6/46/2025-DGTR dated 26th September 2025, the Authority initiated an investigation to examine the existence, degree and effect of any alleged dumping of the subject goods and to recommend the amount of anti-dumping duty, which if levied, would be adequate to remove the alleged injury to the domestic industry.

## B. PROCEDURE

3. The procedure described below has been followed with regard to the present investigation:

**Initiation**

4. In accordance with Rule 5(5), prior to initiation of the investigation, the Authority notified the government of China PR through its embassy in India about the receipt of the present anti-dumping application.

5. As noted above, upon examination of the application, the Authority found prima facie evidence of dumping and consequent injury. Therefore, in accordance with Rules 5 and 6, vide Notification F. No. 6/46/2025-DGTR dated 26th September 2025 ("Initiation Notification"), the Authority initiated the present proceedings.

**Period of Investigation and Injury Period**

6. As noted in the initiation notification, the period of investigation (POI) adopted by the Authority is 1st April 2024 to 31st March 2025 (12 months). The injury investigation period covers the period 1st April 2021 to 31st March 2022, 1st April 2022 to 31st March 2023, 1st April 2023 to 31st March 2024 and the POI.

**Import Data**

7. The Authority has relied upon the DG Systems data for computation of the volume of imports and the required analysis after due examination and segregation of the transactions, the product under consideration not being classified under a dedicated tariff line.

**Circulation of non-confidential version of the application**

8. The Authority provided a copy of the non-confidential version of the application to the known producers/exporters and to the Government of the subject country, through their Embassy in India, in accordance with Rule 6(3) of the Anti-Dumping Rules. The non-confidential version of the application was made available to all interested parties vide email dated 7th October 2025.

**Participation by Exporters of Subject Country**

9. The Authority sent exporter's questionnaire to the known producers/exporters in accordance with Rule 6(4) of the Rules.

10. The Authority sent questionnaires to the government of the subject country through its embassy in India. The government of the subject country was requested to forward the Initiation Notification and the questionnaires to the producers of the subject goods in China PR and advise them to respond to the questionnaire within the prescribed time limit. The following producer/exporter has registered themselves as an interested party in these proceedings and has filed an exporter's questionnaire response:

| SN | Producer/Exporter | Volume of exports to India in the POI (Pcs) |
|---|---|---|
| 1. | Kemmer Prazision Tool (Shanghai) Co., Ltd. | *** |

**Participation by Importers/Users**

11. The Authority sent Importer's and User's Questionnaire to the known importers/users of the subject goods in India calling for necessary information in accordance with Rule 6(4) of the Rules. The following importers/users have registered themselves as interested parties in the present proceedings:

| SN | Importer/User | Response filed |
|---|---|---|
| 1. | AT&S India Private Limited | User Questionnaire Response and Economic Interest Questionnaire response |
| 2. | Sensation Systems | None |

**Registered Interested Parties**

12. A list of all interested parties that registered themselves within the prescribed timeline was uploaded on the website of the Authority on 20th November 2025. All registered interested parties were directed to circulate the non-confidential version of all their submissions in the present proceedings with all the other interested parties.

**Economic Interest Questionnaire**

13. The Authority issued an Economic Interest Questionnaire to the Embassy of the subject country, all the known exporters/producers, importers/users, the domestic industry as well as the other known producers in India. Responses to the Economic Interest Questionnaire have been filed by the domestic industry, by Kemmer Prazision Tool (Shanghai) Co., Ltd. and by AT&S India Private Limited.

**Oral Hearing**

14. In accordance with Rule 6(6) of the Rules, the Authority provided opportunity to the interested parties to present their views orally in a public hearing held on 5th August 2026. The parties, which presented their views in the oral hearing, were requested to file written submissions by 10th August 2026, followed by rejoinder submissions by 15th August 2026. Written submissions have been filed by the domestic industry, by Kemmer Prazision Tool (Shanghai) Co., Ltd. and by AT&S India Private Limited.

**Further Procedures**

15. In the Initiation Notification, the interested parties were directed to file their comments on the scope of the product under consideration ('product scope') and the PCN methodology within 15 days of receipt of intimation of the initiation of the investigation, which period ended on 22nd October 2025. The applicant filed comments vide its submission dated 28th October 2025. After consideration of the submissions filed, the Authority notified a revised product scope and PCN methodology vide its notice dated 3rd November 2025. Kemmer Prazision Tool (Shanghai) Co., Ltd. filed its comments on the revised methodology vide submission dated 6th November 2025. After considering those comments and the concurrence of the domestic industry thereto, the Authority notified the final product scope and PCN methodology vide its notice dated 1st December 2025, which was notified on the website of the DGTR.

16. The Authority sought supplementary information from the cooperating parties. Kemmer Prazision Tool (Shanghai) Co., Ltd. furnished additional information concerning its sales

channels, its self-manufactured exports and the computation of its net export price and landed value vide its response dated 10th April 2026.

17. In accordance with Rule 8, the Authority conducted verification of the data provided by the applicant and other interested parties to the extent considered necessary for the present proceedings. The Authority has considered the verified data of the interested parties in its analysis in the present case.

18. The Authority calculated the non-injurious price (NIP) for the product under consideration so as to ascertain whether duties lower than the dumping margin would be sufficient to remedy the injury being suffered by the domestic industry. The NIP has been calculated based on the optimum cost of production and cost to produce and sell the domestic like article in India, based on the information furnished by the applicant and having regard to the Generally Accepted Accounting Principles (GAAP).

19. The Authority examined the issues raised, information provided and submissions made by the interested parties during the course of the proceedings, to the extent they were supported by evidence and considered relevant to the present investigation, in preparing these final findings.

20. In accordance with Rule 6(8), wherever an interested party has refused access to or has otherwise not provided necessary information in a timely manner during the course of the present proceedings, or has significantly impeded the investigation, the Authority has considered such parties as non-cooperative and recorded the findings based on the facts available.

21. In accordance with Rule 7, information provided by the interested parties on a confidential basis was examined by the Authority with regard to the sufficiency of the confidentiality claimed. On being satisfied, the Authority has accepted the confidentiality claims, wherever warranted, and such information has been considered as confidential and not disclosed to other interested parties. Wherever possible, parties providing information on confidential basis were directed to provide a non-confidential summary of the information filed on a confidential basis.

22. The Authority, during the course of the investigation, satisfied itself as to the accuracy of the information supplied by the interested parties, which forms the basis of the present final findings to the extent possible, and verified the data/documents submitted by all the interested parties to the extent considered relevant, practicable and necessary.

23. A disclosure statement dated 17.09.2026 was issued by the Authority, in accordance with Rule 16 of the Anti-Dumping Rules disclosing the essential facts under consideration in the matter relating to the present anti-dumping investigation. The comments to disclosure statement received from the interested parties have been considered, to the extent found relevant and non-repetitive, in these final findings.

24. '***' in these final findings represents information furnished by an interested party on confidential basis and so considered by the Authority under the Rules.

25. The exchange rate adopted by the Authority for the subject investigation is 1 US$ = ₹ 85.43, being the average of the exchange rates notified by the Central Board of Indirect Taxes and Customs under Section 14 of the Customs Act, 1962 for conversion of the value of imported goods, in force during the period of investigation. The same rate has been applied throughout these final findings.

Source: https://foservices.icegate.gov.in/#/services/viewExchangeRate

## C. PRODUCT UNDER CONSIDERATION AND LIKE ARTICLE

### C.1 Submissions of the other interested parties

26. The other interested parties submitted as follows with regard to the scope of the product under consideration, like article and PCN methodology:

i. AT&S India Private Limited ("AT&S") and Kemmer Prazision Tool (Shanghai) Co., Ltd. ("Kemmer") have submitted that since the applicant also produces PCB tools outside the PUC, they requested the Authority to verify that production, sales, costs and profitability relating to the PUC have been properly separated from those relating to non-PUC products.

ii. It has accordingly been submitted that the Authority must verify whether the applicant has accurately isolated PUC-specific production, sales and other information, and has appropriately allocated costs and profitability as between the PUC and the non-PUC.

iii. Kemmer objected to the earlier flute-diameter band of 0.20–1.74 mm, stating that it combined micro-drills up to 0.50 mm with standard drills above 0.50 mm. According to Kemmer, these products differ in manufacturing process, raw-material use, cost and selling price. Combining them under one PCN could therefore affect the dumping and injury margins. Kemmer supported its claim with sample invoices and proposed a nine-band structure for PCB drills.

iv. No interested party sought exclusion of PCB drills, PCB routers or any PCN from the final scope notified on 1st December 2025. AT&S also accepted that the product manufactured by the domestic industry is a like article to the imported product. However, AT&S submitted that its HDI PCB production requires tools meeting very strict technical specifications, particularly for applications involving very small microvias, and claimed that the domestic industry is unable to supply tools meeting these specific requirements.

### C.2 Submissions of the domestic industry

27. The domestic industry has submitted as follows with regard to the scope of the product under consideration and like article:

i. The product under consideration comprises PCB drills and PCB routers with a standardised shank diameter of 3.175 mm. PCB drills are precision tools engineered to create holes enabling mechanical and electrical interconnection across multiple layers of a printed circuit board, with sizes typically ranging from 0.20 mm to 7.50 mm in diameter. PCB routers are precision tools used to shape the substrate by cutting slots or defining the board outline without creating through-holes, with bit diameters generally ranging from 0.50 mm to 3.175 mm.

ii. No interested party has raised any objection to the scope of the product under consideration as defined in the initiation notification. The scope of the PUC is therefore undisputed and settled for the purposes of the present investigation.

iii. With respect to the PCN methodology, the applicant filed a revised methodology vide its submission dated 28th October 2025. The Authority revised the methodology on 3rd November 2025 and, after considering the comments of Kemmer and the concurrence of the applicant, finalised the methodology on 1st December 2025. The methodology has therefore attained finality and the applicant has no further comments in that regard.

iv. There is no known difference between the subject goods produced by the domestic industry and those exported from the subject country. The two are comparable in terms of physical and chemical characteristics, manufacturing process and technology, functions and uses, product specifications, pricing, distribution and marketing, and tariff classification; they are technically and commercially substitutable; and consumers have used and are using the two interchangeably.

**C.3 Examination by the Authority**

28. At the stage of initiation, the product under consideration was defined as under:

> *"The product under consideration in the present application is 'Printed Circuit Board ("PCB") tools' namely PCB drill and PCB router. PCB drill and PCB router are also known as PCB drill bits and PCB router bits respectively. The PUC is limited to PCB drill and PCB router with a shank diameter of standardized size of 3.175 mm. The term shank diameter refers to the thickness of the cylindrical portion of the tool. The shank portion of the tool is clamped to the machining apparatus, ensuring compatibility with standard collets and spindles used in PCB manufacturing equipment."*

29. The product under consideration is classifiable under Chapter 82 of the First Schedule to the Customs Tariff Act, 1975, titled "Tools, implements, cutlery, spoons and forks, of base metal; parts thereof of base metal", under tariff items 82075000, 82077090 and 82079090. The customs classification is only indicative and is not binding upon the scope of the product under consideration.

30. The Initiation Notification invited all interested parties to file their comments on the product scope and PCN methodology within the prescribed timeline. The Authority notes that no interested party has, at any stage of the present investigation, sought any exclusion from, or any modification of, the scope of the product under consideration so defined. The Authority accordingly adopts the same scope of the PUC as notified in the Initiation Notification, without any change.

31. As regards the PCN methodology, the Authority notes that the methodology was settled through a sequential process in which every interested party had an effective opportunity to be heard. The methodology notified at the stage of initiation comprised a single parameter, namely the type of PCB tool. Comments were invited from all interested parties and were received only from the applicant. A revised methodology introducing flute diameter ranges and coating status was notified on 3rd November 2025. Kemmer thereafter sought bifurcation of the 0.20 mm to 1.74 mm band; the domestic industry concurred; and the Authority accepted the request in its entirety and notified the final methodology on 1st December 2025. The final PCN methodology comprises three parameters, namely the type of PCB tool, the flute diameter range and the coating status, as under:

| **Parameter-1** | **Parameter-2** | | **Parameter-3** | **PCN Code** | |
|---|---|---|---|---|---|
| **PCB DRILL** | **Flute diameter in mm** | **PCN Code** | **Coated/Uncoated** | **If coated** | **If uncoated** |
| PCBD | < 0.20 | A | CC/UC | PCDACC | PCDAUC |
| PCBD | 0.20 to 0.50 | B | CC/UC | PCDBCC | PCDBUC |
| PCBD | 0.51 to 1.74 | C | CC/UC | PCDCCC | PCDCUC |
| PCBD | 1.75 to 3.54 | D | CC/UC | PCDDCC | PCDDUC |
| PCBD | 3.55 to 4.54 | E | CC/UC | PCDECC | PCDEUC |
| PCBD | 4.55 to 5.54 | F | CC/UC | PCDFCC | PCDFUC |
| PCBD | 5.55 to 6.54 | G | CC/UC | PCDGCC | PCDGUC |
| PCBD | 6.55 to 7.00 | H | CC/UC | PCDHCC | PCDHUC |

| | | | | | |
|---|---|---|---|---|---|
| PCBD | > 7.00 | I | CC/UC | PCDICC | PCDIUC |

*Illustratively, the PCN for a PCB drill of flute diameter 1.80 mm, with coating, is "PCDDCC".*

| **Parameter-1** | **Parameter-2** | | **Parameter-3** | **PCN Code** | |
|---|---|---|---|---|---|
| **PCB ROUTER** | **Flute diameter in mm** | **PCN Code** | **Coated/Uncoated** | **If coated** | **If uncoated** |
| PCBR | < 0.80 | A | CC/UC | PCBRACC | PCBRAUC |
| PCBR | 0.800 to 3.175 | B | CC/UC | PCBRBCC | PCBRBUC |
| PCBR | > 3.175 | C | CC/UC | PCBRCCC | PCBRCUC |

*Illustratively, the PCN for a PCB router of flute diameter 1.90 mm, with coating, is "PCBRBCC". In the drill codes, the string "PCD" denotes a PCB drill, which appears as "PCBD" in the Parameter-1 column.*

32. The Authority notes that Rule 2(d) of the Rules defines "like article" as an article which is identical or alike in all respects to the article under investigation or, in the absence of such an article, another article which although not alike in all respects, has characteristics closely resembling those of the articles under investigation.

33. The Authority notes that the import data does not clearly show whether the imported PCB tools are coated or uncoated. Therefore, for the import analysis, all imported tools have been treated as uncoated. This is a conservative approach because coated tools have higher costs and a higher non-injurious price. Treating all imports as uncoated therefore avoids overstating the injury margin.

34. The Authority agrees that injury must be assessed only with reference to the product under consideration. Accordingly, the production, sales, costs and financial data have been examined on a PUC-specific basis, and only costs attributable to the PUC have been considered for determination of the non-injurious price.

35. With regard to the like article, the Authority notes that the claim of the applicant that there is no known difference between the subject goods produced by it and those exported from the subject country has not been contested by any interested party; that AT&S, the principal user and importer, has itself acknowledged the domestic product to be a like article. However, AT&S has raised concerns regarding certain technical requirements for high-end and HDI applications, no specific PCN or product specification has been established on record as being unavailable from the domestic industry. The two are comparable in terms of essential product characteristics, functions and uses, product specifications, distribution and marketing, and tariff classification, and are technically and commercially substitutable. The Authority accordingly holds that the subject goods produced by the domestic industry are a like article to the subject goods imported from the subject country within the meaning of Rule 2(d) of the Rules.

## D. SCOPE OF DOMESTIC INDUSTRY AND STANDING

### D.1 Submissions made by the other interested parties

36. No interested party has raised a substantiated objection to the eligibility of Ind-Sphinx Precision Limited to be treated as the domestic industry, or to the standing of the application. The only request made by AT&S and Kemmer in this connection is that the production and financial data relied upon for the injury determination should be confined to the product under consideration, which has been dealt with in relevant paras above.

**D.2 Submissions made by the domestic industry**

37. The domestic industry has submitted as follows:

i. Ind-Sphinx Precision Limited is a major producer of the product under consideration in India. There is one other known Indian producer, namely CTC India Pvt. Ltd., whose production and capacity details have been placed on record in the application.

ii. The applicant accounted for approximately ***% of the total Indian production of the subject goods during the period of investigation.

iii. The applicant has neither imported the product under consideration from the subject country, nor is it related to any exporter or producer of the product under consideration in the subject country or to any importer thereof in India. It therefore satisfies the requirements of Rule 2(b) read with Rule 5(3) of the Rules. The standing of the applicant has not been disputed by any interested party and may accordingly be accepted.

**D.3 Examination by the Authority**

38. Rule 2(b) of the Rules defines the "domestic industry" as the domestic producers as a whole engaged in the manufacture of the like article and any activity connected therewith, or those whose collective output of the said article constitutes a major proportion of the total domestic production of that article, except when such producers are related to the exporters or importers of the alleged dumped article or are themselves importers thereof.

39. The Authority has examined the production of the applicant and of the other known Indian producer over the injury period. The relevant information is as below:

| SN | Producer | UOM | 2021-22 | 2022-23 | 2023-24 | POI |
|---|---|---|---|---|---|---|
| 1 | Ind-Sphinx Precision Limited | Pcs | *** | *** | *** | *** |
| 2 | CTC India Pvt. Ltd. (estimated) | Pcs | *** | *** | *** | *** |
| 3 | Total Indian production | Pcs | *** | *** | *** | *** |
| 4 | Share of the applicant | % | *** | *** | *** | *** |

40. It is seen that the applicant accounted for approximately ***% of the total Indian production of the product under consideration during the period of investigation. The Authority further notes that the applicant has neither imported the subject goods from the subject country nor is related to any exporter or producer of the subject goods in the subject country or to any importer thereof in India, and that none of these facts has been disputed by any interested party.

41. The Authority accordingly holds that Ind-Sphinx Precision Limited constitutes the "domestic industry" within the meaning of Rule 2(b) of the Rules and that the application satisfies the requirements of standing in terms of Rule 5(3) of the Rules.

## E. CONFIDENTIALITY

**E.1 Submissions made by the other interested parties**

i. Kemmer submitted that the non-confidential version of the domestic industry's submission proposing the revised PCN structure was not available to it before the PCN methodology was revised on 3rd November 2025, and that it therefore could not offer its comments at that stage.

ii. The participating parties have claimed confidentiality in respect of transaction-wise prices, customer identities, costs, profitability, commercial terms and other business-sensitive information.

**E.2 Submissions made by the domestic industry**

i. The domestic industry has objected to the extent of confidentiality claimed by AT&S in its user questionnaire response and, at an earlier stage, to the non-availability of the economic interest questionnaire response of AT&S. It has submitted that information concerning the production process, cost trends and the quantification of downstream impact ought to be meaningfully summarised in the non-confidential version.

**E.3 Examination by the Authority**

i. The Authority has examined the confidentiality claims under Rule 7 of the Rules. Commercially sensitive information, such as transaction details, costs, customer details and profitability, has been kept confidential where justified. At the same time, parties have been required to provide non-confidential summaries, wherever possible, for the public record.

ii. With regard to Kemmer's concern, the Authority notes that interested parties are required to circulate non-confidential versions of their submissions. Kemmer was, however, given an opportunity to comment on the revised PCN methodology after it was notified on 3rd November 2025. Its comments were considered, and the change sought by Kemmer was accepted in the final PCN methodology notified on 1st December 2025.

iii. As regards the objection of the domestic industry, AT&S has filed both the User Questionnaire Response and the Economic Interest Questionnaire Response. Its consumption and cost information has been considered in the impact assessment. The Authority further notes that a response cannot be rejected only because some commercially sensitive information has been kept confidential. However, unsupported claims have not been relied upon, and all parties are required to circulate the non-confidential versions of their submissions.

## F. MISCELLANEOUS ISSUES

**F.1 Submissions by the other interested parties**

i. Kemmer has submitted that its exporter questionnaire response, discloses two distinct channels through which the subject goods were exported to India during the period of investigation. The first comprises subject goods manufactured by Kemmer itself and supplied directly to unrelated customers in India. The second comprises subject goods purchased from another unrelated producer in the subject country and resold to customers in India, in respect of which Kemmer functions merely as a trader and in respect of which the producer concerned has not participated in the investigation. Kemmer has submitted that only the first channel should be considered for the determination of its export price and landed value.

ii. Kemmer has relied upon the final findings dated 14th March 2022 in the sunset review concerning imports of Aluminium Foil from China PR, in which the Authority took into account only those export transactions which were manufactured by the cooperating producer for the purpose of determining its ex-factory export price and landed value.

iii. AT&S and Kemmer have submitted that the application itself records that the domestic industry has the capacity to meet only approximately ***% to ***% of Indian demand, which confirms that imports are required to meet the balance; that imports from China PR have increased commensurately with, and in fact by less than, the increase in demand; and that the existence of substantial imports is not by itself evidence of injurious dumping where a significant part of those imports fills an admitted demand-supply gap.

iv. AT&S has further submitted that it purchases the product under consideration from the domestic industry as well as importing it, that imports are necessary because the domestic industry has neither sufficient capacity nor the ability to meet its quality requirements and specific technical specifications, and that its HDI production requires tools of a specification which the domestic industry cannot supply.

**F.2 Submissions by the domestic industry**

i. The domestic industry has submitted that Sensation Systems only registered as an interested party but did not file the User Questionnaire Response, Economic Interest Questionnaire Response or any supporting information. Relying on *Merino Panel Products Ltd. v. Designated Authority*, it has submitted that mere registration is not sufficient and that an importer must establish its status by furnishing the required questionnaire information under Rule 2(c).

ii. The domestic industry has submitted, vide its letter dated 29th November 2025 and in its post-hearing written submissions, that anti-dumping duty in India is imposed upon the producer and not upon the trader or exporter; that the transactions of the second channel do not reflect Kemmer's production costs, pricing decisions or export behaviour; that the producer from whom the goods were procured has not cooperated; and that such transactions should therefore fall within the residual or non-cooperative universe.

iii. The domestic industry has submitted that the existence of a demand-supply gap is not a defence to dumping; that it holds available and unutilised capacity; that it has in fact supplied AT&S during the period of investigation; that it is capable of expanding production under fair market conditions; and that the imposition of anti-dumping duty does not restrict imports and addresses only unfair pricing.

**F.3 Examination by the Authority**

**Participation of an importer which has not filed a questionnaire response**

42. The Authority notes that Sensation Systems has not filed any questionnaire response, has not responded to the economic interest questionnaire, and has not made any written or oral submission at any stage of the present investigation. No submission of that party is therefore on record which requires to be dealt with in these final findings. The Authority nonetheless holds the settled position that an entity seeking to participate as an interested party must establish its status by furnishing the information called for in the applicable questionnaire, and that where such information is not furnished, the Authority is entitled, in terms of Rule 6(8), to record its findings on the basis of the facts available.

**Treatment of exports of goods not manufactured by the cooperating exporter**

43. The Authority notes that there is no dispute between the parties on this issue. It is the settled practice of the Authority to determine an individual dumping margin, and consequently an individual duty, in respect of a specific producer–exporter combination, and goods produced by a producer which has not participated in the investigation cannot take the benefit of an individual margin determined for a cooperating producer merely because they have been routed through that cooperating exporter. Any other approach would permit the residual duty to be circumvented.

44. The Authority has accordingly determined the net export price, landed value, dumping margin and injury margin in respect of Kemmer solely on the basis of the *** pieces of subject goods produced by Kemmer itself and exported by it to India during the period of

investigation. The subject goods produced by any other producer in the subject country and exported by Kemmer to India fall within the residual or non-cooperative category.

**Demand–supply gap and user-specific technical requirements**

45. The Authority notes that the existence of a demand-supply gap does not, by itself, negate either dumping or material injury. Neither the Act nor the Rules requires a domestic industry to be capable of supplying the entirety of domestic demand as a condition of relief; the relevant inquiry is whether imports are dumped and whether such dumped imports are causing material injury to the domestic industry. The Authority further notes that the applicant held installed capacity of *** pieces against production of *** pieces in the period of investigation, leaving approximately *** pieces of unutilised capacity, and that a second Indian producer is also present in the market. The submission is therefore relevant to the assessment of economic interest and public interest, and has been examined in that context in the relevant paragraphs below, but it does not displace the determination of dumping, injury or causal link.

46. As regards the technical and HDI-related submissions of AT&S, the Authority notes that AT&S has itself acknowledged the domestic product to be a like article and made domestic purchases during the period of investigation, and that no PCN-specific exclusion request supported by evidence establishing that a defined product type is not produced by or cannot be supplied by the domestic industry has been substantiated. The Authority therefore decides not to alter the scope of the product under consideration on this ground.

## G. DETERMINATION OF NORMAL VALUE, EXPORT PRICE, AND DUMPING MARGIN

### G.1 Submissions made by the other interested parties

i. Kemmer submitted that it has fully cooperated in the investigation and filed the required exporter questionnaire response. It has therefore requested that its normal value, export price, landed value, dumping margin and injury margin be determined separately on the basis of its own verified information, and that any duty applicable to it should be based on its individual margins. AT&S has supported this request and submitted that a cooperating producer should not be subjected to the residual duty applicable to non-cooperating producers where its own margins are not positive.

ii. Kemmer has stated that it is not claiming market economy status. Accordingly, it has not sought determination of normal value on the basis of its domestic selling prices in China PR.

iii. Kemmer submitted that its exports to India were made directly to unrelated customers on an ex-works basis. For determining the net export price, credit cost and bank charges were deducted from the invoice value. For determining the landed value, inland freight, port expenses, ocean freight and insurance were added to arrive at the CIF price, followed by basic customs duty and applicable social welfare surcharge.

### G.2 Submissions made by the domestic industry

i. China PR should be treated as a non-market economy country in terms of paragraph 8 of Annexure I to the Rules, and the producers and exporters from China PR should be called upon to demonstrate that market economy conditions prevail in the industry producing the like article. Unless they do so, the normal value must be determined in accordance with paragraph 7 of Annexure I of the Rules.

ii. The applicant attempted to obtain information relating to the cost and price of the product under consideration in a market economy third country but was unable to do so, as such information is not available in the public domain. The normal value has therefore been claimed on the basis of the cost of production in India, duly adjusted for selling, general and administrative expenses and a reasonable profit margin, in terms of the third methodology contemplated in paragraph 7 of Annexure I of the Rules.

iii. The domestic industry has claimed that the dumping margin in respect of subject country is positive and significant.

iv. The domestic industry has submitted that exports made by Kemmer of goods manufactured by an unrelated non-participating producer should not form part of Kemmer's individual export price determination and should instead fall within the residual or non-cooperative universe.

**G.3 Examination by the Authority**

47. Under Section 9A(1)(c) of the Act, normal value in relation to an article means the comparable price, in the ordinary course of trade, for the like article, when meant for consumption in the exporting country or territory. Paragraph 8 of Annexure I to the Rules provides that in the case of imports from non-market economy countries the normal value shall be determined on the basis provided in paragraph 7 of that Annexure. China PR has been treated as a non-market economy country in terms of paragraph 8(2), subject to rebuttal by the responding producers and exporters in accordance with paragraph 8(3).

48. The Authority notes that the following producer/exporter of the subject goods has filed an exporter's questionnaire response and has cooperated in the present investigation:

i. Kemmer Prazision Tool (Shanghai) Co., Ltd. (producer and exporter).

49. No other producer or exporter from the subject country has filed an exporter's questionnaire response or otherwise cooperated in the present investigation, notwithstanding that the initiation notification and the exporter's questionnaire were sent to the known producers and exporters and to the embassy of the subject country in India.

***G.3.1 Determination of Normal Value***

50. The initiation notification called upon the producers and exporters from the subject country to demonstrate, in the format prescribed, that market economy conditions prevail in the industry producing the like article in respect of the production and sale of the product under consideration. Kemmer, the only participating producer and exporter, has expressly stated that it is not claiming market economy status. No other producer or exporter from the subject country has filed a market economy treatment claim or any rebuttal of the presumption under paragraph 8(2). The normal value in respect of the subject country is therefore required to be determined in accordance with paragraph 7 of Annexure I, which reads as follows:

> *"In case of imports from non-market economy countries, normal value shall be determined on the basis of the price or constructed value in the market economy third country, or the price from such a third country to other countries, including India or where it is not possible, or on any other reasonable basis, including the price actually paid or payable in India for the like product, duly adjusted if necessary, to include a reasonable profit margin…"*

51. The Authority has examined the alternatives available under paragraph 7 of Annexure I for determination of normal value. First, no interested party, including the domestic industry, has furnished reliable information regarding the price or constructed value of the like article in an appropriate market economy third country. Therefore, the first option could not be applied. Second, the Authority examined whether the price of the like article exported from

an appropriate market economy third country to other countries, including India, could be used. However, publicly available trade databases such as Trade Map provide data at an aggregated tariff-line level and do not provide the investigation-specific PCN-wise information required in the present case. Since PCB tools are divided into several technical PCNs based on tool type, flute diameter and coating, such aggregate data would not permit a proper like-to-like comparison. The second option was therefore also not considered suitable. Accordingly, as the first two alternatives were not available in a reliable and usable form, the Authority has therefore proceeded on the third of the bases contemplated by paragraph 7, namely "any other reasonable basis, including the price actually paid or payable in India for the like product, duly adjusted if necessary, to include a reasonable profit margin", and has constructed the normal value with reference to the cost to make and sell the like article in India, optimised in terms of the principles of Annexure III, with the addition of a reasonable profit.

### *G.3.2 Determination of Export Price*

**Kemmer Prazision Tool (Shanghai) Co., Ltd.**

52. Kemmer is a producer and exporter of the subject goods in China PR and has filed the exporter's questionnaire response together with a supplementary response dated 10th April 2026. It has exported the subject goods directly to unrelated customers in India on an ex-works basis. For the reasons recorded in relevant paras above, only the subject goods produced by Kemmer itself, being *** pieces, have been taken into account for its individual determination.

53. For arriving at the net export price at the ex-factory level, credit cost and bank charges have been deducted from the ex-works invoice value. For arriving at the landed value, inland freight, port and other expenses and ocean freight and insurance have been added to the ex-works price to arrive at the CIF price, and basic customs duty together with social welfare surcharge thereof, has been added thereto. The adjustments claimed have been examined against the supporting records and have been allowed to the extent found admissible and verifiable. The PCN-wise position is as under:

| PCN | Quantity (Pcs) | Invoice value (USD) | NEP (USD/Pc) | NEP (Rs/Pc) | CIF (USD/Pc) | Landed Value (USD/Pc) | Landed Value (Rs/Pc) |
|---|---|---|---|---|---|---|---|
| PCDBUC | *** | *** | *** | *** | *** | *** | *** |
| PCDCUC | *** | *** | *** | *** | *** | *** | *** |
| PCDDUC | *** | *** | *** | *** | *** | *** | *** |
| **Total** | *** | *** | *** | *** | *** | *** | *** |

**Non-cooperative producers/exporters**

54. The normal value and export price for non-cooperative producers/exporters from China PR have been determined on the basis of facts available in terms of Rule 6(8) of the Rules, using the transaction-wise import data obtained from DG Systems after excluding the transactions attributable to Kemmer.

55. The export price for the non-cooperative producers/exporters has been determined on the basis of the facts available in terms of Rule 6(8) of the Rules.

### *G.3.3 Dumping margin*

56. Considering the normal value constructed as provided above, and the export price as determined, the normal value and the export price have been compared at the ex-factory level of trade. In the case of the cooperating producer/exporter, the comparison has been made between the constructed normal value for the product under consideration and its own weighted average net export price of USD ***per piece as reported in its questionnaire response and examined by the Authority. In the case of the non-cooperative producers/exporters, the comparison has been made with the ex-factory export price determined on the basis of the facts available.

57. The dumping margin so determined for the producers/exporters from the subject country is provided in the table below:

| SN | Producers | Volume of exports (Pcs) | Normal Value (USD/Pc) | Export Price (USD/Pc) | Dumping Margin (USD/Pc) | Dumping Margin (%) | Range (%) |
|---|---|---|---|---|---|---|---|
| 1 | Kemmer Prazision Tool (Shanghai) Co., Ltd. | *** | *** | *** | *** | *** | (10-20) |
| 2 | Any other producer/exporter | *** | *** | *** | *** | *** | 30-40 |

58. The Authority accordingly notes that the dumping margin in respect of the subject goods produced by Kemmer Prazision Tool (Shanghai) Co., Ltd. is negative, and that in respect of all other producers and exporters from the subject country is positive and significant.

## H. EXAMINATION OF INJURY AND CAUSAL LINK

### H.1 Submissions made by the other interested parties

59. The other interested parties have made the following submissions with regard to injury and causal link:

i. The interested parties submitted that the increase in imports from China PR largely followed the increase in demand and that imports declined in the POI from the 2023-24 level. They therefore argued that the POI does not show any fresh surge in imports.

ii. They further submitted that the domestic industry's production, sales, capacity utilisation, market share and inventory position improved in the POI. Although the applicant remained loss-making, the movement in losses did not directly correspond either with import volumes or import prices, and therefore the financial deterioration could not be attributed solely to subject imports.

iii. It was also submitted that other cost factors may have affected the domestic industry. Wages per employee and net fixed assets increased during the injury period without any increase in installed capacity. These increases, according to the interested parties, should therefore be examined as possible non-import factors in the causal-link analysis.

iv. AT&S submitted that, being a major importer of the PUC, the reduction in its PCB production led to lower imports of PCB tools during the POI. Therefore, the decline in imports may be attributable to lower user demand rather than to dumping-related factors.

### H.2 Submissions made by the domestic industry

60. The domestic industry has made the following submissions with regard to injury and causal link:

i. The domestic industry submitted that imports from China PR remain substantial and are well above the base-year level. Their share relative to Indian production increased from about ***% in the base year to about ***% in the POI, and subject imports continued to account for a major share of Indian demand.

ii. It was submitted that the increase in Indian PCB production, following imposition of anti-dumping duty on certain bare PCBs in March 2024, increased demand for PCB tools and helped the applicant improve its production, sales and market share. The subsequent decline in imports and demand during the POI was stated to be largely due to lower PCB production and imports by AT&S. At the same time, imports by other users increased significantly compared with the base year.

iii. The domestic industry submitted that subject imports were entering at prices substantially below its selling price and cost of production. Price undercutting and price underselling were stated to be significant, resulting in price suppression and depression in the domestic market.

iv. The applicant stated that, despite improvement in certain volume indicators, its financial performance remained weak. It earned only marginal profit in the base year and suffered losses thereafter, with similar adverse trends in cash profit, PBIT and return on capital employed. It was submitted that the injury analysis must consider import volume, price effects and the resulting impact on the domestic industry on the basis of positive and objective evidence.

v. It was further submitted that injury was not caused by other known factors. China PR accounted for the overwhelming majority of imports, while imports from other countries were limited and generally at higher prices. Demand increased over the injury period, export performance was separately examined, and no material injury was attributed to technological changes, trade restrictions, shortages of raw material or power, inadequate capacity, investment constraints or plant shutdowns.

**H.3 Examination by the Authority**

61. Rule 11 of the Rules read with Annexure-II thereto provides that an injury determination shall involve examination of factors that may indicate injury to the domestic industry, taking into account all relevant facts, including the volume of dumped imports, their effect on prices in the domestic market for like articles and the consequent effect of such imports on domestic producers of such articles.

62. The Authority has taken note of the various submissions made by the interested parties, including the domestic industry, and has analysed them considering the facts available on record and the applicable laws. The injury analysis made by the Authority hereunder ipso facto addresses the various submissions made by the interested parties.

**Assessment of demand/apparent consumption**

63. The Authority has determined demand/apparent consumption of the product in India as the sum of the domestic sales of the domestic industry, the sales of the other Indian producer and imports from all sources.

| SN | Particulars | UOM | 2021-22 | 2022-23 | 2023-24 | POI |
|---|---|---|---|---|---|---|
| 1 | Sales of domestic industry | Pcs | *** | *** | *** | *** |
| | Trend | Indexed | 100 | 121 | 118 | 163 |
| 2 | Sales of other Indian producer | Pcs | *** | *** | *** | *** |

| | | | | | | |
|---|---|---|---|---|---|---|
| | Trend | Indexed | 100 | 701 | 334 | 392 |
| 3 | Imports from China PR | Pcs | *** | *** | *** | *** |
| | Trend | Indexed | 100 | 146 | 151 | 132 |
| 4 | Imports from other countries | Pcs | *** | *** | *** | *** |
| | Trend | Indexed | 100 | 45 | 883 | 22 |
| 5 | Total Demand/Consumption | Pcs | *** | *** | *** | *** |
| | Trend | Indexed | 100 | 149 | 224 | 139 |

64. It is seen that the demand for the subject goods increased from *** pieces in the base year to *** pieces in the POI, representing a growth of approximately ***% in indexed terms.

65. The Authority notes that the demand figure for 2023-24 is distorted by an exceptional volume of *** pieces recorded against Taiwan in that year alone, against *** pieces in 2022-23 and *** pieces in the POI. The Authority has therefore not treated the 2023-24 demand or market-share position as representative, and the trend analysis has been anchored to the comparison between the base year and the POI.

66. With regard to the volume of dumped imports, the Authority is required to consider whether there has been a significant increase in the dumped imports, either in absolute terms or relative to production or consumption in India. The relevant information is as below:

| SN | Particulars | UOM | 2021-22 | 2022-23 | 2023-24 | POI |
|---|---|---|---|---|---|---|
| 1 | Imports from China PR | Pcs | 68,99,618 | 1,00,73,147 | 1,04,30,398 | 91,26,189 |
| | Trend | Indexed | 100 | 146 | 151 | 132 |
| 2 | Demand in India | Pcs | *** | *** | *** | *** |
| 3 | Indian production | Pcs | *** | *** | *** | *** |
| **4** | **Subject imports in relation to:** | | | | | |
| i | Demand in India | % | *** | *** | *** | *** |
| | Trend | Indexed | 100 | 98 | 67 | 95 |
| ii | Indian production | % | *** | *** | *** | *** |
| | Trend | Indexed | 100 | 149 | 233 | 171 |
| iii | Total imports | % | 85.09% | 94.93% | 49.40% | 97.20% |

67. It is seen that:

i. Subject imports increased in absolute terms from 68,99,618 pieces in the base year to 91,26,189 pieces in the POI, an increase of approximately 32%.

ii. In relation to Indian demand, the share of subject imports at ***% in the POI was marginally below the base-year share of ***%. In relation to Indian production, however, the share of subject imports increased materially, from ***% in the base year to ***% in the POI.

iii. Subject imports accounted for 97.20% of total imports into India in the POI, as against 85.09% in the base year.

68. The Authority therefore holds that, notwithstanding the year-on-year moderation, subject imports remained a major source of supply in the Indian market and accounted for 56.01% of Indian demand in the POI. Subject imports also increased significantly in relation to

Indian production. It is further noted that subject imports increased broadly with the growth in demand over the injury period.

**Price effect of dumped imports on the domestic industry**

69. With regard to the effect of the dumped imports on prices, it is required to be analysed whether there has been a significant price undercutting by the alleged dumped imports as compared to the price of the like products in India, or whether the effect of such imports is otherwise to depress the prices or prevent the price increase, which otherwise would have occurred in the normal course.

**Price undercutting**

70. For the purpose of price undercutting analysis, the net sales realisation of the domestic industry has been compared with the landed value of imports from the subject country. The landed value has been determined by adding basic customs duty to the assessable value reported in the transaction-wise import data.

| Particulars | UOM | POI |
|---|---|---|
| Import volume | Pcs. | 91,26,189 |
| Net Selling Price | Rs/Pc | *** |
| Landed Price | Rs/Pc | 31.31 |
| Price Undercutting | Rs/Pc | *** |
| Price Undercutting | % | *** |
| Price Undercutting | Range (%) | 30-40 |

71. It is noted that the price undercutting is positive and significant.

**Price suppression/depression**

72. In order to determine whether the dumped imports are suppressing or depressing the domestic prices, the changes in the costs and prices over the injury period are examined as below:

| SN | Particulars | UOM | 2021-22 | 2022-23 | 2023-24 | POI |
|---|---|---|---|---|---|---|
| 1 | Cost of sales | Rs/Pc | *** | *** | *** | *** |
| | Trend | Indexed | 100 | 110 | 135 | 117 |
| 2 | Selling price | Rs/Pc | *** | *** | *** | *** |
| | Trend | Indexed | 100 | 101 | 103 | 101 |
| 3 | Landed Value from China PR | Rs/Pc | 40.75 | 40.42 | 38.04 | 31.31 |
| | Trend | Indexed | 100 | 99 | 93 | 77 |

73. It is seen that:

i. The cost of sales of the domestic industry increased from Rs. ***per piece (indexed 100) in the base year to Rs. *** per piece (indexed 117) in the POI.

ii. The selling price of the domestic industry increased only marginally, from Rs. *** per piece (indexed 100) to Rs. *** per piece (indexed 101) over the same period.

iii. The selling price of the domestic industry remained below its cost of sales in each of 2022-23, 2023-24 and the POI.

iv. The landed value of subject imports declined from Rs. 40.75 per piece to Rs. 31.31 per piece (indexed 77) and remained substantially below the domestic industry's cost of sales throughout.

74. It is noted that the domestic industry was prevented from increasing its prices to a degree commensurate with the increase in its costs, and that the dumped imports have had a significant price suppressing effect.

**Economic parameters of the domestic industry**

75. Annexure II to the Anti-Dumping Rules provides that the examination of the impact of the dumped imports on the domestic industry should include an objective and unbiased evaluation of all the relevant economic factors and indices. The various injury parameters relating to the domestic industry are discussed below.

**Capacity, production, capacity utilization and domestic sales**

76. The information on capacity, production, capacity utilization and domestic sales is given below:

| SN | Particulars | UOM | 2021-22 | 2022-23 | 2023-24 | POI |
|---|---|---|---|---|---|---|
| 1 | Capacity | Pcs | *** | *** | *** | *** |
| | Trend | Indexed | 100 | 100 | 100 | 100 |
| 2 | Production (PUC) | Pcs | *** | *** | *** | *** |
| | Trend | Indexed | 100 | 105 | 86 | 114 |
| 3 | Capacity Utilization | % | *** | *** | *** | *** |
| | Trend | Indexed | 100 | 105 | 86 | 114 |
| 4 | Domestic Sales | Pcs | *** | *** | *** | *** |
| | Trend | Indexed | 100 | 121 | 118 | 163 |
| 5 | Demand | Pcs | *** | *** | *** | *** |
| | Trend | Indexed | 100 | 149 | 224 | 139 |

77. It is seen that:

i. The installed capacity of the domestic industry remained constant at *** pieces throughout the injury period.

ii. Production of the subject goods increased from *** pieces in the base year to *** pieces in the POI.

iii. Capacity utilisation, which stood at ***% in the base year, improved to ***% in the POI.

iv. Domestic sales increased substantially, from *** pieces in the base year to *** pieces in the POI.

78. The Authority notes that these improvements are material favourable indicators and demonstrate that the domestic industry was able to participate in the growth of demand during the POI. It is also noted that the domestic industry continued to operate with substantial unutilised capacity. Against installed capacity of *** pieces, production in the POI was ***pieces, leaving approximately ***pieces unutilised, at a time when imports from the subject country stood at 91,26,189 pieces.

**Market share**

79. The market share of the domestic industry, the other Indian producer, the subject country and other countries in Indian demand is given below:

| SN | Market share of | UOM | 2021-22 | 2022-23 | 2023-24 | POI |
|---|---|---|---|---|---|---|
| 1 | Domestic industry | % | *** | *** | *** | *** |
| | Trend | Indexed | 100 | 81 | 53 | 117 |
| 2 | Other Indian producer | % | *** | *** | *** | *** |
| | Trend | Indexed | 100 | 471 | 149 | 283 |
| 3 | Subject country | % | *** | *** | *** | *** |
| | Trend | Indexed | 100 | 98 | 67 | 95 |
| 4 | Other countries | % | *** | *** | *** | *** |
| | Trend | Indexed | 100 | 30 | 394 | 16 |

80. It is seen that the market share of the domestic industry improved from ***% in the base year to ***% in the POI, while the market share of the subject country stood at ***% in the POI as against ***% in the base year.

81. The Authority notes that the domestic industry's production, sales and market share improved during the POI. However, China PR continued to account for more than half of Indian demand, and the domestic industry did not achieve a corresponding improvement in prices or profitability. The Authority therefore considers that improvement in volume indicators alone does not rule out material injury, particularly where dumped imports continue to exert significant price pressure.

**Inventories**

82. The inventory position with the domestic industry over the injury period is given in the table below:

| SN | Particulars | UOM | 2021-22 | 2022-23 | 2023-24 | POI |
|---|---|---|---|---|---|---|
| 1 | Opening Inventory | Pcs | *** | *** | *** | *** |
| | Trend | Indexed | 100 | 90 | 101 | 94 |
| 2 | Closing Inventory | Pcs | *** | *** | *** | *** |
| | Trend | Indexed | 100 | 112 | 104 | 113 |
| 3 | Average Inventory | Pcs | *** | *** | *** | *** |
| | Trend | Indexed | 100 | 101 | 103 | 103 |

83. It is seen that the average inventory of the domestic industry increased only marginally over the injury period, from ***pieces in the base year to ***pieces in the POI. The Authority notes that the domestic industry produces the subject goods under both make-to-order and make-to-stock strategies and maintains a minimal finished goods inventory for repeat orders.

**Profitability, cash profits and return on investment**

84. The performance of the domestic industry with respect to profitability, cash profits, PBIT and return on capital employed is given below:

| SN | Particulars | UOM | 2021-22 | 2022-23 | 2023-24 | POI |
|---|---|---|---|---|---|---|
| 1 | Profit/(loss) before tax | Rs. Lacs | *** | *** | *** | *** |
| | Trend | Indexed | 100 | (147) | (773) | (453) |
| 2 | Profit/(loss) before interest and tax | Rs. Lacs | *** | *** | *** | *** |

| | | | | | | |
|---|---|---|---|---|---|---|
| | Trend | Indexed | 100 | (12) | (322) | (133) |
| 3 | Cash Profit | Rs. Lacs | *** | *** | *** | *** |
| | Trend | Indexed | 100 | (18) | (342) | (154) |
| 4 | Return on Capital Employed (ROCE) | % | *** | *** | *** | *** |
| | Trend | Indexed | 100 | (10) | (338) | (110) |

85. It is seen that:

i. The domestic industry earned a profit of Rs. *** lacs in the base year and thereafter incurred losses in each of the succeeding years, the loss standing at Rs. *** lacs in the POI.

ii. The domestic industry earned a cash profit of Rs. *** lacs in the base year and incurred cash losses in each of the succeeding years, the cash loss standing at Rs. *** lacs in the POI.

iii. Profit before interest and tax was positive only in the base year and negative in each of the remaining three periods.

iv. Return on capital employed was ***% in the base year and turned negative thereafter, standing at (***%) in the POI.

86. The Authority notes that the domestic industry became loss-making, cash-negative and earning a negative return on capital employed in POI as compared to the base year. The Authority has also considered the submission of the interested parties that the losses do not correlate one-to-one with import volumes. The Authority notes that the injury in this case mainly arises from the low prices of dumped imports, which prevented the domestic industry from fully recovering its costs.

**Employment, wages and productivity**

87. Employment, wages and productivity of the domestic industry over the injury period are given in the table below:

| SN | Particulars | UOM | 2021-22 | 2022-23 | 2023-24 | POI |
|---|---|---|---|---|---|---|
| 1 | Employees | Nos. | *** | *** | *** | *** |
| | Trend | Indexed | 100 | 128 | 134 | 131 |
| 2 | Wages | Rs. Lacs | *** | *** | *** | *** |
| | Trend | Indexed | 100 | 141 | 219 | 213 |
| 3 | Wages/employee | Rs./Employee | *** | *** | *** | *** |
| | Trend | Indexed | 100 | 111 | 164 | 162 |
| 4 | Productivity per employee | Pcs | *** | *** | *** | *** |
| | Trend | Indexed | 100 | 82 | 64 | 87 |

88. It is seen that the number of employees rose from 143 in the base year to 188 in the POI and that salaries and wages increased from Rs. *** lacs to Rs. *** lacs. Productivity per employee declined to indexed 64 in 2023-24 and recovered to indexed 87 in the POI,

remaining below the base year. The domestic industry has stated that several factors are involved in the movement of these parameters and has not claimed them as factors of injury.

**Growth**

89. The table below shows the growth of the domestic industry in terms of various parameters:

| SN | Particulars | UOM | 2022-23 | 2023-24 | POI |
|---|---|---|---|---|---|
| 1 | Production | % | 5.48% | (18.36%) | 32.48% |
| 2 | Domestic sales | % | 21.05% | (2.66%) | 38.18% |
| 3 | Profit Before Tax | % | (246.70%) | (426.59)% | (41.40%) |
| 4 | Cash Profit | % | (117.68%) | (1,834.33)% | (54.98%) |
| 5 | ROCE | % | (110.17%) | (3,225.54)% | (67.43%) |
| 6 | Inventory | % | 0.69% | 2.07% | 0.62% |
| 7 | Market Share | % | (18.65%) | (35.34%) | 123.23% |

90. It is seen that growth in the volume parameters was positive in the POI, production having grown by 32.48% and domestic sales by 38.18%, while growth in the price-related and financial parameters was negative. The injury picture is accordingly mixed on the volume indicators and materially adverse on the price and financial indicators.

**Ability to raise capital investment and magnitude of the dumping margin**

91. The Authority notes that the domestic industry has been unable to utilise a substantial part of its installed capacity throughout the injury period and has sustained continued losses and a negative return on capital employed, which has adversely affected its ability to raise capital investment. The Authority further notes that the dumping margin determined in respect of the non-cooperative producers/exporters, who account for approximately 93% of the imports from the subject country during the POI, is positive and significant.

**Conclusion on material injury**

92. Having regard to the foregoing, the Authority notes that:

i. Imports from the subject country increased in absolute terms from 68,99,618 pieces in the base year to 91,26,189 pieces in the POI as compared to the base year, and increased in relation to Indian production from ***% to ***% in the same period, and their share in Indian demand was marginally lower than in the base year.

ii. The domestic industry improved its production, domestic sales, capacity utilisation and market share in the POI. These favourable indicators are expressly recognised.

iii. Notwithstanding that improvement, the domestic industry continued to hold approximately *** pieces of unutilised capacity while imports from the subject country stood at 91,26,189 pieces.

iv. The landed value of the subject imports declined by 23% over the injury period while the cost of sales of the domestic industry rose by ***%, and price undercutting was in the range of 30-40% during the POI.

v. The selling price of the domestic industry remained below its cost of sales in each of the three years following the base year, establishing significant price suppression.

vi. The domestic industry remained loss-making and cash-negative with a negative return on capital employed throughout the period following the base year, including in the POI.

93. The Authority accordingly holds that the domestic industry has suffered material injury within the meaning of Rule 11 read with Annexure II to the Rules, such injury being

manifested principally in adverse price effects and in the financial performance of the domestic industry, notwithstanding the improvement recorded in certain volume indicators during the period of investigation.

## I. CAUSAL LINK AND NON-ATTRIBUTION ANALYSIS

94. Paragraph (v) of Annexure II to the Rules requires the Authority to examine any known factors other than the dumped imports which at the same time are injuring the domestic industry, so that the injury caused by such other factors is not attributed to the dumped imports. The Authority has examined the following known factors.

**Volume and prices of imports from third countries**

95. Imports from countries other than China PR accounted for only 1.61% of Indian demand in the POI and their average CIF price was materially higher than that of the imports from China PR. The exceptional volume recorded against Taiwan in 2023-24 has been separately noted above and does not affect the position in the POI. Imports from third countries therefore cannot explain the price undercutting or the price suppression observed in the POI, and no injury is attributable to them.

**Contraction in demand or change in the pattern of consumption**

96. Indian demand increased from *** pieces in the base year to *** pieces in the POI, an increase of approximately ***%. There was no contraction in demand over the injury period capable of explaining the injury, and no material change in the pattern of consumption has been established.

**Demand and sourcing decisions of AT&S**

97. The Authority notes that AT&S is the largest importer of the subject goods and that the decline in its PCB production contributed to the fall in imports during the POI. However, this explains only the reduction in import volume and not the adverse price effects. The landed value of subject imports declined by 23%, price undercutting increased to 30–40%, and the domestic industry was unable to recover the 17% increase in its cost of sales. Accordingly, the decline in imports due to AT&S does not explain the price and financial injury suffered by the domestic industry.

**Employee cost and net fixed assets**

98. The Authority notes that wages per employee and net fixed assets increased during the injury period. These increases have not been attributed to dumped imports. However, they do not explain the 23% decline in the landed value of subject imports or the increase in price undercutting. Further, while determining the non-injurious price under Annexure III, the Authority has considered only the admissible and optimised costs of the domestic industry and has disallowed part of the costs claimed.

**Export performance**

99. The Authority has based its injury analysis exclusively on the domestic operations of the domestic industry. Export sales and export profitability have been segregated and do not form part of the injury assessment for the domestic market. Export performance is, therefore, not a factor that can explain the injury suffered in the domestic market.

**Performance of other products**

100. The Authority has examined the data relating to the subject goods only. As recorded in above, the cost, sales and profitability data relied upon for the injury determination have been confined to the product under consideration. The performance of other products produced and sold by the domestic industry is not a possible cause of injury in respect of the product under consideration.

**Developments in technology and product quality**

101. There is no evidence that the technology for the production of the subject goods has undergone a material change during the injury period, or that the like article produced by the domestic industry has become technologically obsolete or non-substitutable. AT&S has itself acknowledged the domestic product to be a like article and has purchased it domestically during the POI. Product-specific technical distinctions are addressed through the PCN methodology finally notified. The HDI-related submission of AT&S is relevant to its sourcing decisions and to the assessment of public interest, but does not establish that the product under consideration as a whole is technically non-substitutable.

**Trade restrictive practices and competition**

102. No trade restrictive practice has been alleged or established which could have contributed to the injury suffered by the domestic industry. The domestic and foreign producers compete in the same market and there is no restriction on the movement of the subject goods within India.

**Anti-dumping duty on bare printed circuit boards**

103. The Authority notes the submission of the domestic industry that the improvement in its volume parameters in the POI is attributable to the anti-dumping duty imposed on bare printed circuit boards of up to six layers vide Notification No. 03/2024-Customs (ADD) dated 14th March 2024, which increased domestic PCB production and consequently the demand for PCB tools. The Authority accepts that this measure is a relevant external factor bearing upon the improvement in the domestic industry's volume performance. It operates, however, in favour of the domestic industry rather than against it, and its effect is to explain why certain volume indicators improved notwithstanding the continuance of dumped imports. It does not detract from the finding of adverse price effects.

**Factors affecting causal link:**

i. The volume of imports from the subject country increased in absolute terms and relative to production in India, and the subject country accounted for a majority share of Indian demand in the POI.

ii. The landed value of subject imports declined by 23% over the injury period and is substantially below the selling price and the cost of sales of the domestic industry, resulting in significant and widening price undercutting.

iii. The dumped imports have suppressed domestic prices, preventing the domestic industry from increasing its prices to recover a ***% increase in its cost of sales.

iv. The domestic industry is incurring financial losses, cash losses and a negative return on capital employed in every period following the base year, including the POI.

v. The domestic industry has retained approximately *** pieces of unutilised capacity in the POI while subject imports stood at 91,26,189 pieces.

vi. No other known factor breaks the causal link between the dumped imports and the material injury suffered by the domestic industry.

104. For the reasons set out above, the Authority considers that the non-attribution arguments raised by the interested parties, whether based on the movement of imports with demand, the improvement in volume parameters, the absence of a one-to-one correlation between losses and import volumes or prices, the increase in employee cost and net fixed assets, or the sourcing decisions of AT&S, do not individually or collectively explain the material injury found in the domestic market. The verified record shows a simultaneous and mutually reinforcing pattern of dumped imports retaining a dominant market share, significant and

widening price undercutting, price suppression, financial losses and negative returns. The Authority therefore holds that the injury suffered by the domestic industry is attributable to the dumped imports from the subject country.

## J. MAGNITUDE OF INJURY MARGIN

105. The Authority has determined the Non-Injurious Price for the domestic industry on the basis of principles laid down in the Rules read with Annexure III, as amended. The non-injurious price of the subject goods has been determined by adopting the verified information/data relating to the cost of production for the period of investigation. For determining the non-injurious price, the best utilisation of the raw materials and utilities by the domestic industry over the injury period has been considered, along with the best utilisation of production capacity. A reasonable return @ 22% on average capital employed was allowed towards interest, tax and profit to arrive at the non-injurious price as prescribed in Annexure III of the Rules.

106. The injury margin for the producers/exporters from the subject country so determined by the Authority is provided in the table below:

| SN | Producers | Volume of exports (Pcs) | NIP (USD/Pc) | Landed Value (USD/Pc) | Injury Margin (USD/Pc) | Injury Margin (%) | Range (%) |
|---|---|---|---|---|---|---|---|
| 1 | Kemmer Prazision Tool (Shanghai) Co., Ltd. | *** | *** | *** | *** | *** | (20-30) |
| 2 | Any other producer/exporter | *** | *** | *** | *** | *** | 10-20 |

107. It is noted that the injury margin is negative for Kemmer Prazision Tool (Shanghai) Co., Ltd. and for the non-cooperative producers/exporters it is positive and significant.

108. Applying the lesser-duty rule, the Authority has adopted the lower of the dumping margin and injury margin determined for each producer/exporter. The corresponding ad-valorem duty has been calculated separately as a percentage of the relevant CIF value.

## K. IMPACT ASSESSMENT

### Public interest and Domestic Industry Interest

### K.1 Submissions made by the other interested parties

109. The following submissions have been made by the other interested parties with regard to public interest and the interest of the Indian user industry:

i. **AT&S India Private Limited ("AT&S")** has submitted that PCB drills and routers are essential consumable inputs in PCB manufacturing and cannot be readily substituted. Selection of such tools depends upon customer-specific and product-specific requirements relating to dimensions, accuracy, reliability and quality, particularly for high-density interconnect ("HDI") and other high-end PCBs. Any increase in the cost of such tools would therefore increase the cost of PCB manufacturing.

ii. AT&S and Kemmer have submitted that imports are required to supplement domestic supplies and that the domestic industry is not capable of meeting the entirety of Indian demand. AT&S has further submitted that it sources the PUC both domestically and through imports, and that source-switching cannot necessarily be undertaken immediately because of technical qualification and customer requirements.

iii. AT&S has submitted that a substantial part of its PCB production is exported and that an increase in the cost of PCB tools may therefore affect its competitiveness both in the domestic and export markets.

iv. Kemmer Prazision Tool (Shanghai) Co., Ltd. has submitted that public interest also requires appropriate producer-specific treatment and that a cooperating producer whose own dumping and injury margins are not positive should not be subjected to the residual duty applicable to non-cooperating producers.

**K.2 Submissions made by the domestic industry**

110. The following submissions have been made by the domestic industry:

i. The domestic industry has submitted that anti-dumping duty is a corrective trade-remedial measure and does not prohibit or quantitatively restrict imports. PCB drills and routers are consumable manufacturing tools and their cost incidence should be assessed with reference to their share in the total cost of PCB production rather than by reference to the increase in the price of the tool alone.

ii. The domestic industry has further submitted that the applicant has substantial unutilised capacity and another Indian producer is present in the market. According to the domestic industry, restoration of fair pricing conditions would improve utilisation of Indian capacity, support domestic precision-tool manufacturing and reduce long-term dependence upon dumped imports without preventing users from continuing to import the subject goods.

**K.3 Examination by the Authority**

111. The Authority has examined the likely impact of the anti-dumping duty on users of the product under consideration, particularly on the basis of the quantified information furnished by AT&S. PCB drills and routers are consumable tools used in PCB manufacturing and their cost forms part of the cost of PCB production.

112. During the POI, AT&S consumed 63,41,692 pieces of the PUC at a cost of ₹172.57 million, while its total PCB-production cost was ₹4,359.67 million. Thus, the PUC accounted for approximately 3.96% of the total PCB-production cost.

113. For the non-cooperative producers/exporters, the lesser duty is recommended at 18% of the CIF value. At the POI average CIF price of approximately ₹28.21 per piece, this corresponds illustratively to about ₹5.08 per piece. If this incidence is applied, purely for assessing an upper-side impact, to the entire quantity of 63,41,692 pieces consumed by AT&S during the POI, the additional cost would be approximately ₹32.20 million.

| **Particulars** | **Quantity / Value** | Illustrative impact of residual duty @ 18% of CIF |
|---|---|---|
| Consumption of the PUC | 63,41,692 pieces / ₹172.57 million | Additional duty ≈ ₹32.20 million |
| Average PUC cost | ≈ ₹27.21/piece | At average POI CIF ≈ ₹28.21/piece, duty incidence ≈ ₹5.08/piece |
| PUC cost after duty | ₹172.57 million | ≈ ₹204.77 million |
| Total cost of PCB production | ₹4,359.67 million | Additional cost ≈ ₹32.20 million |

| | | |
|---|---|---|
| Increase in total PCB-production cost | — | ≈ 0.74% |
| Total PCB-production cost after duty | — | ≈ ₹4391.87 million |
| PUC share of PCB-production cost after duty | Existing: 3.96% | ≈ 4.66% |

114. The above 0.74% represents an upper-side impact, since it assumes that every PCB tool consumed by AT&S is imported from a producer attracting the residual rate and that the entire duty is borne by the user. In practice, domestic purchases would not attract anti-dumping duty. Further, Kemmer has a negative dumping and injury margin and its qualifying exports would attract a NIL rate.

115. The Authority also notes that the Indian market continues to depend significantly upon imports from China PR. At the same time, the applicant had approximately 44.84 lakh pieces of unutilised capacity during the POI and another Indian producer is also present in the market. Imposition of anti-dumping duty would also not prohibit imports.

116. The Authority has taken note of the technical and qualification requirements raised by AT&S. However, AT&S has itself purchased the subject goods from Indian sources, and no specific PCN or specification has been established on record as being generally unavailable from domestic producers.

117. Accordingly, while the determined duty would have some cost impact on PCB manufacturers, the quantified upper-side impact of the residual ad-valorem duty is approximately 0.74% of the total PCB-production cost of the participating user. The actual impact may be lower depending upon the sourcing mix, including purchases from domestic producers and from Kemmer at the individual NIL rate. The evidence on record therefore does not indicate that the measure would impose a disproportionate burden on the downstream PCB industry.

118. Accordingly, the Authority considers that public interest is best served by an appropriately calibrated measure which removes the injurious price advantage arising from dumping while preserving legitimate access to imports and recognising the technical requirements of PCB manufacturers. On the evidence presently available, such a measure would support fair competition, domestic precision-tool manufacturing and greater supply resilience without imposing a disproportionate burden upon the downstream PCB industry, and would therefore not be contrary to public interest.

## L. POST-DISCLOSURE COMMENTS

### L.1 COMMENTS BY THE OTHER INTERESTED PARTIES

**Kemmer: cooperation, individual determination, negative margins and NIL duty**

119. Kemmer Prazision Tool (Shanghai) Co., Ltd. has submitted that it is the only cooperating producer/exporter from China PR and that its individual net export price, landed value, dumping margin and injury margin should be confirmed on the basis of the information furnished in its exporter questionnaire response and supplementary response. Kemmer has requested confirmation of the negative dumping margin and negative injury margin disclosed by the Authority, the PCN-wise net export price and landed value determined for its own-produced exports, and a NIL rate of anti-dumping duty. AT&S has supported confirmation of the negative margins determined for Kemmer and has submitted that a

cooperating producer whose own margins are not positive should not be subjected to the residual duty applicable to non-cooperating producers.

120. Kemmer has further submitted that, if any of the essential confidential calculations concerning its individual determination are changed, a revised disclosure should precede the final findings. It has also requested that its name be correctly reflected as "Kemmer Prazision Tool (Shanghai) Co., Ltd." in the final findings and the duty table.

**Material injury and improvement in the domestic industry's volume parameters**

121. AT&S has submitted that the domestic industry's production, domestic sales, capacity utilisation and market share improved during the POI and that the number of employees, wages and wages per employee also increased over the injury period. According to AT&S, these favourable indicators are material to the assessment under Annexure II and support the conclusion that the domestic industry is not suffering material injury merely because an injury margin is positive for the residual category.

**Demand-supply gap, technical requirements and public interest**

122. AT&S has submitted that imports remain necessary to bridge the gap between Indian demand and domestic supply, particularly because the PUC is an input used in PCB production, only two Indian producers are present, and users have customer-specific quality and technical requirements. AT&S has also submitted that a substantial part of its PCB production is exported and that imposition of anti-dumping duty on necessary imports may affect its export competitiveness. It has therefore requested that the final determination should take account of availability, source-switching constraints and downstream public interest.

## L.2 COMMENTS BY THE DOMESTIC INDUSTRY

**Request to confirm the findings disclosed by the Authority**

123. The domestic industry has requested confirmation of the findings concerning the scope of the product under consideration and like article, the scope and standing of the domestic industry, confidentiality, miscellaneous issues, injury and causal link, non-attribution and the impact assessment, subject to the specific post-disclosure issues raised by it.

**Basic Customs Duty exemption available for imports used in PCB manufacture**

124. The domestic industry has submitted that Serial No. 125 of Customs Notification No. 25/99-Customs covers, inter alia, solid carbide drills and routers when imported for use in the manufacture of printed circuit boards and provides a NIL rate of Basic Customs Duty subject to fulfilment of the prescribed conditions. It has therefore requested re-examination of the landed value wherever the exemption is applicable, contending that a lower landed value may affect price undercutting and the injury margin.

**Segregation of Kemmer's own-produced exports and traded exports**

125. The domestic industry has challenged the segregation between goods manufactured by Kemmer and goods stated to have been procured from an unrelated Chinese producer and traded by Kemmer. It has relied on product descriptions and coding appearing in Kemmer's product brochure and on its transaction-wise analysis to contend that the import descriptions correspond to Kemmer's commercial coding system. It has also stated that six PCNs appear in the import data whereas the individual determination disclosed for Kemmer covers three PCNs. On this basis, the domestic industry has requested re-examination of the producer

identity, traceability and PCN mapping of the export transactions and has disputed the negative dumping and injury margins determined for Kemmer.

**Form of anti-dumping duty**

126. The domestic industry has requested that, if duty is recommended, it should be expressed on an ad-valorem basis rather than as a fixed amount per piece. It has submitted that PCB drills and routers comprise multiple PCNs with material differences in specifications, costs and prices and that an ad-valorem measure would avoid a disproportionate incidence on lower-priced products and an inadequate incidence on higher-priced products.

**Producer identification and prevention of misuse of the individual NIL rate**

127. The domestic industry has submitted that, if Kemmer receives a NIL individual rate while other producers/exporters are subject to the residual duty, the individual rate should be protected against misuse through routing of goods produced by non-participating producers. It has requested a producer-identification requirement for each shipment, including a declaration identifying the actual producer of the goods, so that Customs can apply the correct producer-specific rate.

## L.3 EXAMINATION BY THE AUTHORITY

**Findings not specifically modified by the post-disclosure examination**

128. The Authority has considered the post-disclosure comments filed by the domestic industry, Kemmer and AT&S together with the information already on record. Except to the extent specifically examined below, the Authority confirms the determinations recorded above concerning the scope of the PUC and like article, domestic industry and standing, confidentiality, the treatment of non-cooperating parties, material injury, causal link and public interest. The post-disclosure comments do not disclose any basis for reopening those determinations beyond the specific issues addressed hereafter.

**Basic Customs Duty exemption and landed value**

129. The Authority notes that Serial No. 125 of Notification No. 25/99-Customs includes solid carbide drills and routers used in the manufacture of printed circuit boards. However, the entry covers goods falling under specified tariff chapters, which do not include Chapter 82, under which the PUC is classified in the present investigation. Further, the exemption is subject to prescribed end-use and procedural conditions. Therefore, the mere mention of drills and routers in the notification does not establish that all imports of the PUC are eligible for Nil BCD.

130. The interested parties have not established, through transaction-wise import records, that the subject imports considered in the injury analysis were eligible for and actually cleared under the said exemption. Accordingly, the Authority does not consider it appropriate to apply Nil BCD to the entire import volume merely on the basis of the notification. The landed-value determination has therefore not been altered on this ground. This does not affect the customs treatment of any individual consignment that satisfies the applicable legal requirements.

**Kemmer's cooperation, producer-wise segregation and individual margins**

131. The Authority confirms that Kemmer Prazision Tool (Shanghai) Co., Ltd. is a cooperating producer/exporter. Its exporter questionnaire response and supplementary information have been examined for the purpose of its individual determination. Consistent with the producer-

specific nature of an individual rate, only the *** pieces identified on the investigation record as having been manufactured by Kemmer and exported to India have been included in Kemmer's individual export-price and landed-value determination. Goods manufactured by another producer and merely exported or traded by Kemmer do not obtain the benefit of Kemmer's individual rate and fall within the residual category.

132. The Authority has examined the domestic industry's submission regarding Kemmer's product codes and descriptions. A matching product code or description does not, by itself, prove that the goods were manufactured by Kemmer. The manufacturer has been identified on the basis of the questionnaire response and transaction records. The post-disclosure submissions do not provide sufficient evidence to change the treatment already adopted by the Authority.

133. The Authority therefore confirms the individual determination for Kemmer on the three PCNs forming part of its own-produced exports, namely PCDBUC, PCDCUC and PCDDUC. The weighted average net export price and landed value remain as determined above. The dumping margin and the injury margin for Kemmer remains negative. No anti-dumping duty is therefore recommended on qualifying exports of the subject goods manufactured by Kemmer. Since the final determination does not introduce a materially different adverse factual basis or methodology for Kemmer, the request for a further disclosure is not accepted.

134. The Authority also notes Kemmer's reliance on Rule 14. Since the individual dumping margin determined for Kemmer is negative, no duty is recommended for its qualifying exports. The country-wide investigation, however, also covers other producers/exporters for whom the dumping and injury margins are positive; the determination in respect of those producers/exporters is therefore dealt with separately in the duty recommendation below.

**Material injury notwithstanding favourable volume indicators**

135. The Authority has expressly taken account of the improvement in production, domestic sales, capacity utilisation, market share, employment and wages. These are favourable indicators and have not been disregarded. Annexure II, however, requires an evaluation of the totality of relevant economic factors and does not make deterioration in every indicator a condition for a finding of material injury.

136. In the POI, the domestic industry continued to face significant adverse price and financial effects. The landed value of subject imports remained substantially below the domestic selling price; price undercutting was positive and significant; the cost of sales was about 17% above the base-year level while the selling price was only about 1% higher; and the domestic industry remained loss-making, cash-negative and earned a negative return on capital employed. The favourable volume indicators therefore do not outweigh the established adverse price effects and financial injury. The Authority accordingly confirms the finding of material injury recorded above.

**Demand-supply gap, technical requirements and public interest**

137. The Authority reiterates that a demand-supply gap does not, by itself, negate dumping, injury or causal link and that anti-dumping duty does not prohibit imports. The record shows that the applicant retained approximately *** lakh pieces of unutilised capacity in the POI and that another Indian producer is present. The Authority has also considered AT&S's technical qualification and sourcing concerns; however, no defined PCN or specification has been established on record as being generally unavailable from Indian producers, and AT&S itself purchased the PUC from Indian sources during the POI.

138. The form and level of the measure have also been considered from the perspective of downstream users. At the residual ad-valorem rate of 17% of CIF, the upper-side mechanical impact on AT&S, if its entire POI consumption were assumed to attract the residual rate at the POI average CIF price, is approximately ₹32.20 million, equivalent to about 0.74% of its total PCB-production cost. This is a conservative illustration because domestic purchases and qualifying imports from Kemmer at the NIL rate would not bear the residual incidence. The Authority therefore confirms that the appropriately calibrated measure is not shown to impose a disproportionate burden on the downstream PCB industry or to be contrary to public interest.

**Ad-valorem form of duty**

139. The Authority accepts the domestic industry's request regarding the form of the measure. The PUC comprises PCB drills and PCB routers across multiple PCNs with material differences in specifications and price levels. In these circumstances, expressing the duty as a percentage of the CIF value maintains a more proportionate incidence across lower- and higher-priced variants than a uniform fixed amount per piece. The definitive duty is therefore recommended on an ad-valorem basis, subject to the lesser-duty rule.

**Producer-identification safeguard and correct name of Kemmer**

140. The Authority considers the concern regarding misuse of the individual NIL rate to be relevant because that rate is producer-specific. A separate Certificate of Origin requirement need not be created in these findings, since origin documentation is governed by the applicable customs law. However, the benefit of the individual NIL rate shall be conditional upon presentation of a valid commercial invoice identifying the actual producer and containing the producer declaration specified below the duty table. Where such declaration is not presented, or where the goods are produced by a producer other than Kemmer, the residual duty shall apply.

141. The Authority further records the correct name of the cooperating producer/exporter as "Kemmer Prazision Tool (Shanghai) Co., Ltd." and the same has been used in the duty table.

## M. CONCLUSION

142. Having regard to the contentions raised, information provided, submissions made and the facts available on record, and on the basis of the analysis recorded above, the Authority concludes as follows:

i. The product under consideration is "Printed Circuit Board Tools", namely PCB drills and PCB routers with the scope and PCN methodology determined above, originating in or exported from China PR.

ii. Ind-Sphinx Precision Limited constitutes the domestic industry within the meaning of Rule 2(b) of the Rules and the application satisfies the standing requirements under Rule 5(3).

iii. Kemmer Prazision Tool (Shanghai) Co., Ltd. is the only cooperating producer/exporter from China PR whose individual response has been accepted for determination. Its dumping margin and injury margin is negative. Accordingly, no anti-dumping duty is warranted on qualifying exports of the subject goods manufactured by Kemmer.

iv. For all other producers/exporters from China PR, the dumping margins and injury margins determined on facts available are positive and significant. In accordance with the lesser-duty rule, the injury margin is lower and forms the basis of the residual duty recommendation.

v. The domestic industry recorded improvement in certain volume indicators during the POI, including production, sales, capacity utilisation and market share. At the same time, subject imports remained substantial, price undercutting was positive and significant, the landed value of imports declined materially over the injury period, domestic prices were suppressed, and the domestic industry remained loss-making, cash-negative and earned a negative return on capital employed.

vi. The Authority has examined the known other factors, including demand growth, importer's sourcing decisions, employee costs, net fixed assets, export performance, other products, technology and imports from third countries. These factors do not explain the adverse price effects and financial injury established on the record. The Authority therefore concludes that the domestic industry has suffered material injury caused by dumped imports from the subject country.

vii. The evidence on record does not establish that the recommended measure would create scarcity or impose a disproportionate burden on downstream users. Imports would remain available subject to the ADD so recommended, and the upper-side quantified impact on the participating user at the residual rate is approximately 0.74% of PCB-production cost. The Authority therefore concludes that imposition of an appropriately calibrated anti-dumping duty is not contrary to public interest.

## N. RECOMMENDATIONS

143. The Authority notes that the investigation was initiated and notified to all interested parties and adequate opportunity was provided to the domestic industry, producers/exporters, importers, users and other interested parties to furnish information and make submissions on dumping, injury, causal link and public interest. The Authority has also considered the post-disclosure comments filed by the parties.

144. Having concluded that the subject goods exported by producers/exporters other than Kemmer Prazision Tool (Shanghai) Co., Ltd. are dumped and are causing material injury to the domestic industry, the Authority considers it necessary to recommend definitive anti-dumping duty equal to the lower of the dumping margin and the injury margin. The duty is recommended on an ad-valorem basis in view of the material variation in specifications and prices across the PCNs comprising the PUC.

145. Accordingly, the Authority recommends imposition of anti-dumping duty on imports of the product under consideration originating in or exported from China PR at the rates specified in the duty table below. The duty shall take effect from the date of notification to be issued by the Central Government and shall remain in force for a period of five years, unless revoked, superseded or amended earlier in accordance with law.

### DUTY TABLE

| S. No. | Heading | Description of Goods* | Country of Origin | Country of Export | Producer | Duty as % of CIF |
|---|---|---|---|---|---|---|
| 1 | 2 | 3 | 4 | 5 | 6 | 7 |
| 1 | 82075000, 82077090 and 82079090 | Printed Circuit Board Tools | China PR | Any country including China PR | Kemmer Prazision Tool (Shanghai) Co., Ltd. | NIL |

| | | | | | | |
|---|---|---|---|---|---|---|
| 2 | -do- | -do- | China PR | Any country including China PR | Any producer other than at S. No. 1 | 17% |
| 3 | -do- | -do- | Any country other than China PR | China PR | Any | 17% |

**The PUC is limited to PCB drill and PCB router with a shank diameter of standardized size of 3.175 mm*

Note - The application of the individual duty rates specified for the company mentioned above shall be conditional upon presentation to customs authorities of a valid commercial invoice, on which shall appear a declaration dated and signed by an official of the entity issuing such invoice, identified by his/her name and function, drafted as follows:

> "I, the undersigned, certify that the (volume) of (product concerned) sold for export to India covered by this invoice was manufactured by (producer name and address) in the (name of country). I declare that the information provided in this invoice is complete and correct." If no such invoice is presented, the duty applicable to all other producers shall apply. This requirement is without prejudice to the verification procedures independently undertaken by the Customs authorities under the applicable customs law and regulations.

## O. FURTHER PROCEDURE

146. An appeal against the determination of the Designated Authority in these final findings shall lie before the Customs, Excise and Service Tax Appellate Tribunal in accordance with the relevant provisions of the Act/Rules.

Digitally signed by
Amitabh Kumar
Date: 25-09-2026
16:53:58

**Amitabh Kumar**
**Designated Authority**