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F. No. No. 6/66/2026-DGTR

**Government of India
Ministry of Commerce & Industry
Department of Commerce
Directorate General of Trade Remedies
4th Floor, Jeevan Tara Building,
5 Parliament Street, New Delhi – 110001**

Dated: **23-09-2026**

INITIATION NOTIFICATION
SETU Case ID: AD/OI/067/2026

Subject: Initiation of anti-dumping investigation concerning imports of “Copolymer Polyol of hydroxyl value ≥ 23.5 ” originating in or exported from China PR.

A. BACKGROUND

1. F. No. No. 6/66/2026-DGTR: M/s Expanded Polymer Systems Pvt. Ltd. (hereinafter referred to as the “applicant”) has filed an application before the Designated Authority (hereinafter referred to as the “Authority”), on behalf of the domestic industry, in accordance with the Customs Tariff Act, 1975, as amended from time to time (hereinafter 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, as amended from time to time (hereinafter referred to as the “Rules”), seeking initiation of an anti-dumping investigation by alleging dumping of “Copolymer Polyol of hydroxyl value ≥ 23.5 ” (hereinafter referred to as the “subject goods” or the “product under consideration” or the “PUC”), originating in or exported from China PR (hereinafter referred to as the “subject country”).
2. The applicant has alleged that the subject goods are being imported into India at dumped prices and that such imports have caused material injury to the domestic industry. Accordingly, the applicant has requested for imposition of anti-dumping duty on imports of the subject goods from the subject country.

**B. PREVIOUS INVESTIGATION AND PENDING PROCEEDINGS
BEFORE THE HON’BLE HIGH COURT OF GUJARAT**

3. The Authority had earlier initiated an anti-dumping investigation concerning imports of the same product originating in or exported from China PR, vide Notification F. No. 6/40/2024-DGTR dated 30.09.2024, with April 2023 to March 2024 as the period of investigation. The Authority issued its Final Findings in that investigation vide Notification F. No. 6/40/2024-DGTR dated 26.09.2025. No anti-dumping duty has been imposed on the subject goods pursuant to the said Final Findings.

4. The Authority notes that the applicant has filed Special Civil Application No. 7230 of 2026 (M/s Expanded Polymer Systems Pvt. Ltd. v. Union of India & Anr.) before the Hon'ble High Court of Gujarat at Ahmedabad. By its order dated 08.06.2026 in the said proceedings, the Hon'ble High Court has, *inter alia*, directed that provisional assessment of imports concerning the product in issue be made for the time being, and has made it clear that the said direction will not create any equities in favour of the respondent. The said proceedings are pending before the Hon'ble High Court.
5. The Authority is aware of the aforesaid proceedings. The order dated 08.06.2026 does not restrain the Authority from initiating a fresh investigation, and the period of investigation in the present application is different from that of the earlier investigation. In these circumstances, the Authority finds no legal bar in proceeding with the initiation of the present investigation on the basis of the application received.
6. The initiation of the present investigation is, however, without prejudice to the proceedings pending before the Hon'ble High Court. The finality of the present proceedings shall be subject to the decision of the Hon'ble High Court in the aforesaid Special Civil Application, and to any action taken by the Central Government pursuant to the interim directions of the Hon'ble High Court regarding provisional assessment. The Authority shall take such further action in the present investigation as may be warranted in accordance with law in light of such decision or action.

C. PRODUCT UNDER CONSIDERATION

7. The product under consideration is "Copolymer Polyol of hydroxyl value $\geq$ 23.5". The PUC is also known as Polymer Polyol in market parlance.
8. The PUC is mainly used for manufacturing of Flexible Foam, which is majorly used in manufacturing of mattresses. It is also used for the manufacturing of bra-cups. It is a Polymer Polyol which improves the hardness of slab foam when added in the manufacturing process of slab polyurethane foam.
9. The subject goods are classified under Chapter 39 of the First Schedule to the Customs Tariff Act, 1975, under Heading 3907. The applicant has claimed that the PUC is imported under HS Codes 39072010, 39072090, 39072910 and 39072990, and this claim shall be examined during the investigation. The scope of the product under consideration is determined by the product description and not by the customs classification, which is indicative only and not binding on the scope of the PUC; goods meeting the description of the PUC shall be covered irrespective of the tariff item under Heading 3907 under which they are classified or imported. The applicable Indian standard for the PUC is IS 18174:2023 (Polyether Polyol), which is not mandatory. The unit of measurement considered for the present investigation is Metric Tons (MT).
10. The applicant has not proposed any Product Control Number (PCN) methodology at the present stage. The parties to the present investigation may provide their comments on the scope of the PUC and propose PCNs, if

any, along with justification therefor, within 15 days of the initiation of this investigation.

D. LIKE ARTICLE

11. The applicant has stated that there are no significant differences in the article produced by the applicant and exported from the subject country. The article produced by the applicant and imported from China PR 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 of the subject goods. The subject goods and the article manufactured by the applicant are technically and commercially substitutable. The applicant has claimed that consumers of the PUC are using the subject goods and the article manufactured by the applicant interchangeably. Thus, for the purposes of initiation of the present investigation, the subject goods produced by the applicant and the subject goods imported from the subject country are *prima facie* being treated as 'like article' to each other.

E. DOMESTIC INDUSTRY & STANDING

12. Rule 2(b) of the Rules defines domestic industry as follows:

"domestic industry' means 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 in such case the 'domestic industry' may be construed as referring to the rest of the producers"

13. The application has been filed by M/s Expanded Polymer Systems Pvt. Ltd. The applicant has claimed that it is the sole producer of the subject goods in India and that, as per the best available information, there are no other producers of the subject goods in India. The applicant accounts for 100% of the Indian production.
14. The applicant has also stated that it has not imported the subject goods from the subject country during the period of injury. Moreover, the applicant has stated that it is not related to any importer or exporter of the subject goods.
15. In view of the above, on the basis of the information available on record, the Authority considers that the applicant constitutes domestic industry as defined under Rule 2(b) of the Rules and that the application satisfies the requirements of standing in terms of Rule 5(3) of the Rules.

F. SUBJECT COUNTRY

16. The subject country for the present investigation is China PR.

G. PERIOD OF INVESTIGATION (POI)

17. The period of investigation ("POI") for the present investigation is from 1st April 2025 to 31st March 2026 (12 months). The injury investigation period covers the periods 2022-23, 2023-24, 2024-25 and the POI.

H. BASIS OF ALLEGED DUMPING

a) Normal value for China PR

18. The applicant has claimed that the producers from China PR must be asked to demonstrate that market economy conditions prevail in the industry with regard to the production and sale of the subject goods, in accordance with Para 7 of Annexure-I to the Rules. Unless the producers from China PR demonstrate that such market economy conditions prevail, the normal value for China PR is required to be determined in accordance with Annexure-I of the Rules.

19. For the purpose of the present initiation, the Authority has considered China PR to be a non-market economy and, in the absence of information on record for determining normal value on any other basis, has determined the normal value for China PR on the basis of the price payable in India. The normal value has been constructed based on the cost of production of the applicant, duly adjusted for selling, general and administrative expenses, along with a reasonable profit margin.

b) Export price

20. For the purpose of initiation, the export price of the subject goods has been determined by considering the CIF price of the subject goods as reported in the import data maintained by the DG Systems. Appropriate adjustments have been made, wherever claimed and considered necessary, on account of ocean freight, marine insurance, commission, inland freight, port expenses, bank charges, credit cost to arrive at the net ex-factory export price. The net export price so determined is considered appropriate for the purpose of initiation of the present investigation.

c) Dumping margin

21. The normal value and the export price have been compared at the ex-factory level, which *prima facie* indicates that the dumping margin in respect of the subject goods from the subject country is above the *de minimis* level and is significant. Thus, there is sufficient *prima facie* evidence that the subject goods originating in or exported from the subject country are being dumped in the Indian market.

I. INJURY AND CAUSAL LINK

22. The applicant has furnished information on various parameters relating to 'injury' to the domestic industry as prescribed under the Rules. The evidence

provided by the applicant *prima facie* shows injury to the domestic industry that has been caused by the alleged dumped imports from China PR.

23. The applicant has provided information with respect to the injury suffered by it because of the alleged dumped imports. The volume of the subject imports from the subject country has increased in absolute terms as well as in relation to the consumption and production in India, and the share of the subject country in the demand has increased as compared to the base year, whereas the market share of the applicant has declined as compared to the base year. The price undercutting from the subject country is positive. The landed value of the subject imports is below the cost of sales of the applicant, and the applicant has claimed that the dumped imports have suppressed and depressed its prices and prevented it from increasing its prices to recover the full cost and achieve a reasonable rate of return. The applicant is suffering financial losses, cash losses and negative return on investment, its capacity remains under-utilized despite the increase in demand, and its inventories have increased.
24. The applicant has claimed that no factor other than the dumped imports from the subject country has caused injury to the domestic industry. There is sufficient *prima facie* evidence of material injury being caused to the applicant due to the alleged dumped imports from the subject country to justify the initiation of the anti-dumping investigation.

J. INITIATION OF THE ANTI-DUMPING INVESTIGATION

25. On the basis of the duly substantiated written application submitted by the applicant and having reached satisfaction, on the basis of the *prima facie* evidence submitted by the applicant, concerning the dumping of the product under consideration originating in or exported from the subject country, the consequential injury to the domestic industry as a result of the alleged dumping of the subject goods and the causal link between such injury and the dumped imports, and in accordance with Section 9A of the Act read with Rule 5 of the Rules, the Authority hereby initiates an anti-dumping investigation to determine the existence, degree and effect of the alleged dumping with respect to the product under consideration originating in or exported from the subject country and to recommend the appropriate amount of anti-dumping duty, which, if levied, would be adequate to remove the injury to the domestic industry. The initiation of the investigation is subject to the position stated in Section B above.

K. PROCEDURE

26. The provisions contained in Rule 6 of the Rules shall be followed in the present investigation.

L. SUBMISSION OF INFORMATION

27. All information, questionnaires and submissions for this investigation must be filed through the SETU Portal only, within the deadlines specified in this notification. The Authority may not consider submissions sent via email or

any other mode.

28. In order to participate in the investigation, all interested parties are required to register themselves on the SETU Portal (<https://setu.dgtr.gov.in>). In case of any difficulty in registering as an interested party, the DGTR's SETU Helpdesk may be contacted through the details provided at <https://setu.dgtr.gov.in/help-desk>. All communications and submissions from interested parties must be filed through the SETU Portal under their registered name and the corresponding Case ID mentioned above. Interested parties are required to ensure that the narrative part of the submissions is filed in searchable PDF/MS Word format, while data files must be submitted in MS Excel format with properly linked calculations.
29. The known producers/exporters in the subject country, the Government of the subject country through its Embassy in India, and the importers and users in India known to be concerned with the subject goods are being informed separately to enable them to file all relevant information in the form and manner prescribed within the time limits set out below. All such information must be filed in the form and manner prescribed by this initiation notification, the Rules, and the applicable trade notices issued by the Authority.
30. Parties interested in the investigation are hereby advised to intimate their interest, including the nature of interest, in the present investigation and file their questionnaire responses/submissions within the time limits mentioned in this initiation notification.
31. Any other interested party may also make submissions relevant to the present investigation in the form and manner prescribed within the time limits specified in this notification. Any party making any confidential submission before the Authority is required to simultaneously file a non-confidential version of the same. The non-confidential version should be a replica of the confidential version.
32. Interested parties are further directed to regularly visit the official website of the Directorate General of Trade Remedies <https://www.dgtr.gov.in>, and the SETU Portal <https://setu.dgtr.gov.in>, for any updated information with respect to this investigation. Interested parties are directed to stay apprised of further developments in the subject investigation and remain informed regarding notices that may be issued from time to time regarding questionnaire formats, PCN methodology, PCN discussions/meeting schedule, notice for oral hearing, disclosure, corrigendum, amendment notifications, final findings and other such information.

M. TIME LIMIT

33. The confidential version (CV) and the non-confidential version (NCV) must be uploaded in the respective designated sections of the SETU Portal within 37 days from the date on which the non-confidential version of the application filed by the domestic industry would be circulated by the Authority on the SETU Portal or transmitted to the appropriate diplomatic representative of the exporting country as per Rule 6(4) of the Rules. If no information is received within the prescribed time limit or the information received is incomplete, the

Authority may record its findings on the basis of the facts available on record in accordance with the Rules.

34. Any party wishing to register as an interested party in the present investigation must register through the SETU Portal and file its questionnaire responses and submissions strictly within the time limits mentioned above in this initiation notification.
35. The 15-day period to file comments on the scope of the product under consideration / PCN methodology shall run concurrently with the time limit mentioned above in this initiation notification.
36. An extension of time by 15 days shall be granted if the Authority, through a subsequent notice, modifies the PUC and PCN that was not previously proposed or is different from the initiation notification. This extension of 15 days shall be granted from the date of such notification of the modified PUC and prescription of PCN. The extension of time by 15 days stated in this paragraph shall not be applicable in instances where there is no change in the PUC and PCN methodology after initiation of the investigation. Requests for a further extension of time, beyond the 15-day extension, if granted, will ordinarily not be considered except in exceptional circumstances, in line with Rule 6(4) of the Rules.
37. Any request for extension must be submitted by the concerned party through the SETU Portal at least 3 days before the original deadline. Requests submitted after this time will not be considered.

N. SUBMISSION OF INFORMATION ON CONFIDENTIAL BASIS

38. Any party making confidential submissions or providing information on a confidential basis before the Authority is required to simultaneously submit a non-confidential version of the same information in terms of Rule 7 of the Rules and in accordance with the relevant trade notices issued by the Authority in this regard. Failure to adhere to the above may lead to rejection of the response/submissions.
39. The parties making any submission, including questionnaire responses and appendices/annexures attached thereto, before the Authority are required to file confidential and non-confidential versions separately in the designated sections of the SETU Portal.
40. The parties making submissions before the Authority shall ensure that:
 - i. two separate versions are uploaded; one marked as confidential and the other marked as non-confidential;
 - ii. where the submission contains multiple parts or annexures, an index table listing all such parts and annexures is provided; and
 - iii. every page of the submission is properly page numbered.
41. Where the original document is in a language other than English or Hindi, the interested party shall provide a true translation thereof in English or Hindi along with the original document.

42. The confidential or non-confidential submissions must be clearly marked as "confidential" or "non-confidential" at the top of each page. Any submission made without such marking shall be treated as non-confidential by the Authority, and the Authority shall be at liberty to allow other interested parties to inspect such submissions.
43. The confidential version shall contain all information which is, by nature, confidential and/or any other information which the supplier of such information claims as confidential. For information claimed as confidential, whether by nature or for any other reason, the supplier of such information is required to provide a good cause statement along with the information supplied, explaining why such information cannot be disclosed.
44. The non-confidential version of the information filed by interested parties is required to be a replica of the confidential version, with the confidential information preferably indexed or blanked out where indexation is not possible. Such information must be appropriately and adequately summarised, depending upon the information on which confidentiality is claimed.
45. The non-confidential summary must be in sufficient detail to permit a reasonable understanding of the substance of the information furnished on a confidential basis. However, in exceptional circumstances, where the party submitting confidential information considers that such information is not susceptible to summary, such party may so indicate and provide a statement of reasons containing sufficient and adequate explanation, in terms of Rule 7 of the Rules and the appropriate trade notices issued by the Authority, as to why such summarisation is not possible, to the satisfaction of the Authority.
46. Interested parties may offer their comments on the confidentiality claims made by other parties within 7 days from the date of circulation of the non-confidential version of the documents.
47. The Authority may accept or reject the request for confidentiality after examination of the nature of the information submitted. If the Authority is satisfied that the request for confidentiality is not warranted, or if the supplier of the information is either unwilling to make the information public or to authorise its disclosure in a generalised or summary form, the Authority may disregard such information.
48. Any submission made without a meaningful non-confidential version thereof or without a sufficient and adequate cause statement in terms of Rule 7 of the Rules and the relevant trade notices issued by the Authority shall not be taken on record by the Authority.
49. Where the Authority is satisfied that the request for confidentiality is warranted, it shall not disclose such information to any party without the specific authorisation of the party providing such information.

O. INSPECTION OF PUBLIC FILE

50. All non-confidential versions of the submissions made by any interested party will be accessible to other interested parties through their respective login on

the SETU Portal.

P. NON-COOPERATION

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

Digitally signed by
Amitabh Kumar
Date: 23-09-2026
19:18:53

Amitabh Kumar
Designated Authority