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Government of India

Ministry of Commerce & Industry

Directorate General of Trade Remedies

4th Floor, Jeevan Tara Building,

5, Parliament Street, New Delhi – 110001

Dated: 29th September, 2025

INITIATION NOTIFICATION

Case No. AD (SSR- 12/2025)

Subject: Initiation of Sunset Review investigation concerning imports of “Aluminium Foil 80 micron and below” originating in or exported from China PR, Indonesia, Malaysia, and Thailand.

1. Having regards to 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’), M/s. Raviraj Foils Ltd., M/s. LSKB Aluminium Foils Pvt. Ltd., M/s. Hindalco Industries Ltd., M/s. Shyam Sel and Power Ltd., M/s. Shree Venkateshwara Electrocast Pvt. Ltd., and M/s. SRF Altech Ltd. (hereinafter referred to as the ‘Applicants’ or ‘Applicant companies’) have filed an application before the Designated Authority (hereinafter referred to as the ‘Authority’), for initiation of sunset review investigation of anti-dumping duty imposed on the imports of “Aluminium Foil 80 micron and below” (hereinafter referred to as the ‘product under consideration’ or ‘subject goods’), originating in or exported from China PR, Indonesia, Malaysia, and Thailand.
2. In terms of Section 9A (5) of the Act, the anti-dumping duties imposed shall, unless revoked earlier, cease to have effect on expiry of five years from the date of such imposition, and the Authority is required to review whether the expiry of the said duty is likely to lead to continuation or recurrence of dumping and injury to the domestic industry. In accordance with the same, the Authority is required to review, on the basis of a duly substantiated request made by or on behalf of the domestic industry as to whether there is a need for the continued imposition of the anti-dumping duty, and whether the expiry of the duty is likely to lead to continuation or recurrence of dumping and injury.

A. Background of Previous Investigations

3. The Authority initiated an investigation into ‘aluminium foil’ vide Notification No. 14/06/2015-DGAD on 15th December 2015. The product under consideration in this investigation was aluminium foil ranging from 5.5 micron to 80 micron. The Authority issued final findings in the investigation on 10th March 2017, recommending duty on aluminium foil ranging from 5.5

micron to 80 micron. The Ministry of Finance imposed the duties vide Notification No. 23/2017-Customs (ADD) dated 16th May 2017.

4. Thereafter, the Authority initiated an investigation into the subject goods vide Notification No. 06/21/2020-DGTR dated 20th June 2020, into imports of “Aluminium Foil 80 micron and below” from China PR, Malaysia, Thailand, and Indonesia. The scope of the product under consideration in this investigation excluded aluminium foil of 5.5 micron to 80 micron from China PR, as duties were already in force on this product. Following a detailed investigation, the Authority concluded that the subject goods were exported from China PR, Malaysia, Thailand, and Indonesia at dumped prices and consequently the domestic industry suffered material injury. The Authority vide its Final Findings No. 6/21/2020-DGTR, dated 18th June 2021 recommended imposition of definitive anti-dumping duties, which were imposed by the Ministry of Finance vide Customs Notification No. 51/2021-Customs (ADD), dated 16th September 2021 for a period of five years.
5. The Authority initiated a mid-term review investigation vide Notification No. 7/3/2024-DGTR dated 29th March 2024. It was concluded that there was no need for re-quantification of anti-dumping duty applicable to producers in Thailand vide final findings notified on 26th March 2025.
6. Separately, anti-dumping investigation was conducted into imports of “Aluminium Foil of from China PR, initiated vide Notification No. 06/35/2023-DGTR dated 21st March 2024. The said investigation excluded aluminium foil below 5.5 micron from China PR, as the same was included in the product scope of the investigation concluded in 2021. Provisional duties were imposed vide Notification No. 06/35/2023-DGTR dated 28th August 2024. Ministry of Finance imposed the preliminary duties vide Notification No. 02/2025-Customs (ADD) dated 17th March 2025. Thereafter, the Authority recommended definitive anti-dumping duties vide final findings dated 20th March 2025, which were then imposed by the Ministry of Finance vide Notification No. 15/2025- Customs (ADD) dated 19th June 2025. These duties are currently in force.

B. Product Under Consideration

7. The product under consideration, as in the original investigation, is Aluminium Foil 80 micron and below. As per the original investigation carried out by the Designated Authority, the product has been defined as under:

“Aluminium Foil whether or not printed or backed with paper, paper board, plastics or similar packaging materials of a thickness of 80 micron and below (with permissible tolerances)” excluding the following:

- i. *Aluminium foil of thickness ranging from 5.5 micron to 80 micron originating in China.*
- ii. *Alu Alu Laminate*
- iii. *Ultra-Light Gauge Converted*
- iv. *Aluminium Foil Composite*
- v. *Aluminium foil for capacitors width below 500 mm*

- vi. Etched or formed Aluminium Foils
- vii. Aluminium composite panel
- viii. Clad with compatible non clad Aluminium Foil
- ix. Aluminium Foil for beer bottle
- x. Aluminium- Manganese- Silicon based and/ or clad Aluminium- Manganese- Silicon based alloys, whether clad or unclad
- xi. Adhesive Tapes
- xii. Color coated aluminium foil

8. The product under consideration is classified under subheading 7607 of the Customs Tariff Act, 1975. Imports of the subject goods enter India under the following codes: 76071190, 76072090, 76072010, 76071110, 76071999, 76071991, 76071995, 76071910, 76071994, 76071993 and 76071992. The customs classification is indicative only and is not binding on the scope of the product under consideration.
9. The Applicants have proposed the adoption of Product Control Numbers (PCNs) for the fair comparison between different types of products as was considered in the original investigation with one proposed change. It has been contended that 'alu alu laminated converted' is now being imported in the thickness range of 40-45 microns. Accordingly, the range of micron for 'alu alu laminated converted' has been proposed as 40-60 microns, whereas it was previously considered as 45-60 microns.
10. The PCN as suggested by the Applicants is given below. The interested parties can provide their comments on the PCNs for the purpose of this investigation within 10 days from the date of initiation of this investigation.

SN	Type of Foil	Micron Range	Bare / Converted	PCN Codes
(1)	(2)	(3)	(4)	(5)
1	Alu Alu Stock/Foil	40-60	Bare Foil	ASBF
2	House Foil/Home Foil	8-22	Bare Foil	HFBF
3	Light Gauge (LG)	7- < 20	Bare Foil	LGBF
4	Medium Gauge (MG)	20-80	Bare Foil	MGBF
5	Semi Rigid Container (SRC)	29-80	Bare Foil	SRBF
6	Ultra-Light Gauge Bare	0- <7	Bare Foil	UGBF
7	Battery Foil	9-20	Bare Foil	BFBF
8	Capacitor	4.5 - 20	Bare Foil	CFBF
9	*Any other Bare Foil (not falling within S.No.1-8)		Bare Foil	OFBF
10	Cigarette Foil	5.5-7	Converted	CFCF
11	Alu Alu Converted / laminated	40-60	Converted	ASCF
12	House/home Foil Converted	8-22	Converted	HFCF
13	SRC Converted	29-80	Converted	SRCF

14	Medium Gauge (MG) Converted	20-80	Converted	MGCF
15	Light Gauge (LG) Converted	7-<20	Converted	LGCF
16	Battery Foil Converted	9-20	Converted	BFCF
17	Any other converted Foil (Not falling within S.No. 10-16)		Converted	OFCF
18	Ultra-Light Gauge Bare	0- <7	Converted	UGCF

C. Like Article

11. The Applicants have claimed that the subject goods, which are being dumped into India, are identical to the goods produced by the domestic industry. There are no differences either in the technical specifications, quality, functions or end-uses of the dumped imports and the domestically produced subject goods and the product under consideration manufactured by the Applicants. The two are technically and commercially substitutable. The present application is for sunset review investigation for the continued imposition of anti-dumping duty. The issue of like article has already been examined by the Authority in the original investigation as well. The product produced by the domestic industry is like article to the product under consideration produced and imported from the subject countries.

D. Subject Countries

12. The investigation being a sunset review, the scope of the subject countries is confined to the subject countries in the previous investigation, i.e. against the subject goods originating in or exported from China PR, Indonesia, Malaysia, and Thailand.

E. Period of Investigation

13. The period of investigation (POI) for the present investigation is 1st April 2024 to 31st March 2025 (12 months) and the injury investigation period will cover the periods from 1st April 2021 to 31st March 2022, 1st April 2022 to 31st March 2023, 1st April 2023 to 31st March 2024, and the POI.

F. Domestic Industry and Standing

14. The Application has been filed by M/s. Raviraj Foils Ltd., M/s. LSKB Aluminium Foils Pvt. Ltd., M/s. Hindalco Industries Ltd., M/s. Shyam Sel and Power Ltd., M/s. Shree Venkateshwara Electrocast Pvt. Ltd., and M/s. SRF Altech Ltd. Apart from the applicant companies, there are 26 other domestic producers of the subject goods. The Authority has also reached out to these other known producers seeking information on their production, sales, capacity, and capacity utilisation. however, no information has been received as yet.
15. Raviraj Foils Ltd., Hindalco Industries Ltd., Shyam Sel and Power Ltd., and Shree Venkateshawara Electrocast Pvt. Ltd. have certified that they have not imported the subject goods and are not related to any exporter or producer of the subject goods in China PR, Indonesia,

Malaysia, and Thailand or any importer of the subject goods in India. LSKB Aluminium Foils Pvt. Ltd., and SRF Altech Ltd. have imported the subject goods in the POI, however it has been seen that the imports are low in volume and insignificant in relation to their own production, imports, and consumption.

16. The Applicants have estimated total Indian production and the same has been considered appropriate at this stage. Thus, on the basis of information available and after due examination, the Authority notes that production by the Applicants constitutes "a major proportion" of total Indian production. Thus, the Applicants constitute domestic industry within the meaning of Rule 2(b), and the application satisfies the requirements of Rule 5(3) of the anti-dumping Rules.

G. Basis of Alleged Dumping

a. Normal Value for China PR

17. The domestic industry has claimed that China PR should be treated as a non-market economy, and the normal value should be determined in terms of Paragraph 7 of Annexure I of the Rules. The domestic industry has cited Paragraph 8(2) of Annexure I of the Rules and has stated that Chinese producers should be directed to demonstrate that market economy conditions prevail in the industry producing the subject goods in terms Para 8(3) of Annexure I of the Rules. The domestic industry has claimed that for China, normal value should be determined in accordance with para 7 and 8 of Annexure I of the Rules.

18. The domestic industry has thus, normal value has been determined on the basis of price paid or payable in India, duly adjusted to include profit, which has been determined considering cost of production in India, after addition for selling, general & administrative expenses and reasonable profits. Normal value for China PR, for the purpose of initiation of the investigation, has been constructed based on the best estimates of the cost of production of the domestic industry after duly adjusting the selling, general & administrative expenses and reasonable profits.

b. Normal Value for Indonesia and Malaysia

19. The Applicants have claimed that the data relating to price in Indonesia and Malaysia is not publicly available and were unable to obtain actual transaction price of the producers in Indonesia and Malaysia. The Applicants have further submitted that since there is a large variety of PCNs and a lack of dedicated codes, normal value could not be determined based on import price. This information is also not available with the Authority from any public source. The normal value for Indonesia and Malaysia has been estimated on the basis of best estimates of cost of production of subject goods in India along with associated selling, general and administrative expenses, and reasonable profit. For the purpose of initiation, the Authority has considered normal value considering the best estimates of the cost of production, based on facts available, after duly adjusting the selling, general & administrative expenses and reasonable profits.

c. Normal Value for Thailand

20. The Applicants have submitted that raw material constitutes significant portion of the total cost of production of the subject goods. It has further been submitted that the primary raw material—aluminium foil stock—is sourced by Thai producers from affiliated entities in China which is a non-market economy. It has been claimed that the input cost of raw material procured from China should be rejected. The claim will be investigated further during the course of the investigation. The normal value for the exporters of Thailand has been estimated based on estimated cost of production in India, along with associated selling, general and administrative expenses, and reasonable profit.
21. For the purpose of initiation, the Authority has considered normal value considering the best estimates of the cost of production, based on facts available, after duly adjusting the selling, general & administrative expenses and reasonable profits.

d. Export Price

22. The Authority has computed the export price for the subject goods for the subject countries based on the DG Systems import data. Adjustments have been made for ocean freight, marine insurance, commission, port expenses, inland freight, and bank charges.

e. Dumping Margin

23. The normal value and the export price have been compared at ex-factory level, which *prima facie* shows that dumping margin is above the *de-minimis* level and is significant in respect of the product under consideration from the subject countries. There is sufficient *prima facie* evidence that the product under consideration from the subject countries continues to be dumped in the domestic market of India by the exporters from the subject countries.

H. Likelihood of Continuation or Recurrence of Injury and Causal Link

24. Information provided by the Applicants *prima facie* shows that the volume of imports continues to remain significant and are being made at dumped and injurious prices. It is also noted that the performance of the domestic industry continues to remain adverse. The domestic industry's profitability, cash profit and ROI have declined over the injury period. The market share of the Indian industry is low despite there being sufficient capacity to cater to the demand. The Applicants have claimed that there is likelihood of dumping and injury and have provided information on existing surplus capacities, export orientation, trade remedial measures by other countries, shifting of dumping from one source to another, continued price undercutting as factors establishing likelihood of continuation/recurrence of dumping and injury to the domestic industry should anti-dumping duty is allowed to lapse.

I. Initiation of Sunset Review of Anti-dumping Investigation

25. Therefore, in view of the duly substantiated written application by or on behalf of the domestic industry, and having satisfied itself, on the basis of the prima facie evidence submitted by the domestic industry, about the likelihood of continuation or recurrence of dumping and injury to the domestic industry, in accordance with Section 9A (5) of the Act, read with Rule 23(1B) of the Rules, the Authority, hereby, initiates a sunset review investigation to review the need for continued imposition of the duties in force in respect of the subject goods, originating in or exported from the subject countries and to examine whether the expiry of existing duties are likely to lead to continuation or recurrence of dumping and consequent injury to the domestic industry.

J. Procedure

26. Principles as stated under Rules 6 of the AD Rules shall be followed in the present investigation.

K. Submission of Information

27. All communication should be sent to the Designated Authority via email at the following addresses jd12-dgtr@gov.in and ad12-dgtr@gov.in, with a copy to dir15-dgtr@gov.in and consultant-dgtr@govcontractor.in. It should be ensured that the narrative part of the submission is in searchable PDF/MS-Word format and data files are in MS-Excel format. Submissions requiring special software to access the files will not be accepted.

28. The known producers/exporters in the subject countries, the government of the subject countries through their embassies in India, the importers and users in India known to be concerned with the subject goods are being informed separately to enable them to file all the relevant information in the form and manner prescribed within the time limits set out below.

29. Any other interested party may also make submissions relevant to the present investigation in the form and manner prescribed within the time limits set out below. Any party making and confidential submissions before the Authority is required to make a non-confidential version of the same available to other parties.

30. Interested parties are further directed to regularly visit the official website of the Directorate General of Trade Remedies (<https://www.dgtr.gov.in>) to stay updated and apprised with the information as well as further processes related to the investigation.

L. Time Limit

31. Any information relating to the present investigation should be sent to the Designated Authority via email at email addresses jd12-dgtr@gov.in and ad12-dgtr@gov.in, with a copy to dir15-dgtr@gov.in and consultant-dgtr@govcontractor.in within 30 days from the date on which it was sent by the Designated Authority or transmitted to the appropriate diplomatic representative of the exporting country as per Rule 6(4) of the AD Rules. It may, however, be noted that in terms of explanation of the said Rule, the notice calling for information and other documents shall be deemed to have been received within one week from the date on which it was sent by the

Designated Authority or transmitted to the appropriate diplomatic representative of the exporting country. 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 fact available on record in accordance with the AD Rules.

32. All the interested parties are hereby advised to intimate their interest (including the nature of interest) in the instant matter and file their questionnaire responses within the above time limit.
33. Where an interested party seeks additional time for filing of submissions, it must demonstrate sufficient cause for such extension in terms of Rule 6(4) of the AD Rules and such request must come within the time stipulated in this notification.

M. Submission of Information on Confidential Basis

34. Any party making any confidential submission or providing information on confidential basis before the Authority, is required to simultaneously submit a non-confidential version of the same in terms of Rule 7(2) of the Rules and the Trade Notices issued in this regard. Failure to adhere to the above may lead to rejection of the response/ submissions.
35. The parties making any submission (including Appendices/ Annexures attached thereto), before the Authority including questionnaire response, are required to file Confidential and Non-Confidential versions separately. In case the submission is made in multiple parts, it is instructed to provide an index table in each part outlining the contents of all parts/emails and documents enclosed. Please ensure page numbering on all submissions.
36. Where the original documents are in a language other than English or Hindi, the interested parties are requested to ensure that the true translated version is provided along with the original documents.
37. 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 the other interested parties to inspect such submissions.
38. The confidential version shall contain all information which is by nature confidential and/or other information which the supplier of such information claims as confidential. For information which is claimed to be confidential by nature or the information on which confidentiality is claimed because of other reasons, the supplier of the information is required to provide a good cause statement along with the supplied information as to why such information cannot be disclosed.
39. The non-confidential version of the information filed by the interested parties should be a replica of the confidential version with the confidential information preferably indexed or blanked out (where indexation is not possible) and such information must be appropriately and adequately summarized depending upon the information on which confidentiality is claimed.

40. The non-confidential summary must be in sufficient detail to permit a reasonable understanding of the substance of the information furnished on a confidential basis. However, in exceptional circumstances, the party submitting the confidential information may indicate that such information is not susceptible to summary and a statement of reasons containing a sufficient and adequate explanation in terms of Rule 7 of the Rules, and appropriate trade notices issued by the Authority, as to why such summarization is not possible, must be provided to the satisfaction of the Authority.
41. The interested parties can offer their comments on the issues of confidentiality claimed by the domestic industry within 7 days from the date of circulation of the non-confidential version of the documents.
42. Any submission made without a meaningful non-confidential version thereof or a sufficient and adequate cause statement in terms of Rule 7 of the Rules, and appropriate trade notices issued by the Authority, on the confidentiality claim shall not be taken on record by the Authority.
43. The Authority may accept or reject the request for confidentiality on examination of the nature of the information submitted. If the Authority is satisfied the request for confidentiality is not warranted or if the supplier of the information is either unwilling to make the information public or to authorize its disclosure in generalized or in summary form, it may disregard such information.
44. The Authority on being satisfied and accepting the need for confidentiality of the information provided, shall not disclose it to any party without specific authorization of the party providing such information.

N. Inspection of Public File

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

O. Non-Cooperation

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



Siddharth Mahajan
Designated Authority