

INITIATION NOTIFICATION

SETU Case ID: AD/OI/033/2026

To be published in Part-I Section I of the Gazette of India Extraordinary

**F. No. 6/33/2026-DGTR**  
**Government of India**  
**Ministry of Commerce & Industry**  
**(Directorate General of Trade Remedies)**  
**4th Floor, Jeevan Tara Building,**  
**5 Parliament Street, New Delhi- 110001**

**Dated: June 2026**

**INITIATION NOTIFICATION**

**(Case No. AD(OI) - 033/2026)**

**Subject: Initiation of anti-dumping investigation concerning imports of “Certain Antioxidants” originating in or exported from China PR, Korea RP and Singapore**

1. **F. No. 6/33/2026-DGTR:** Having regard 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 for Determination of Injury) Rules, 1995 as amended from time to time (hereinafter referred to as the "Rules" or the "Anti-dumping Rules"), M/s. Vinati Organics Limited (hereinafter also referred to as “VOL” or "Applicant") has filed an application before the Designated Authority (hereinafter also referred to as the "Authority"), for initiation of an anti-dumping investigation concerning imports of "Certain Antioxidants" (hereinafter referred to as "subject goods" or "product under consideration" or "PUC"), originating in or exported from China PR, Korea RP, and Singapore (hereinafter referred to as "subject countries").
2. The applicant has alleged that dumped imports of the subject goods from China PR, Korea RP, and Singapore are causing material injury to the domestic industry and has requested for the imposition of anti-dumping duty on imports of the subject goods from the subject countries. The applicant has also sought provisional duties on the subject imports.

**A. PRODUCT UNDER CONSIDERATION**

3. The product under consideration in the present investigation is “Certain Antioxidants” conforming to the following CAS nos., or their equivalent, and blends thereof:
  - a. 6683-19-8, also known as Antioxidant 1010 and its equivalents. The chemical name is Pentaerythritol tetrakis(3-(3,5-di-tert-butyl-4-hydroxyphenyl) propionate).
  - b. 2082-79-3, also known as Antioxidant 1076 and its equivalents. The chemical name is Octadecyl-3-(3,5-di-tert-butyl-4-hydroxyphenyl)-propionate.
  - c. 31570-04-4, also known as Antioxidant 168 and its equivalents. The chemical name is Tris(2,4-di-tert butylphenyl) phosphite.

## INITIATION NOTIFICATION

SETU Case ID: AD/OI/033/2026

- d. 23128-74-7, also known as Antioxidant 1098 and its equivalents. The chemical name is N,N'-hexane-1,6-diylbis(3-(3,5-di-tert-butyl-4-hydroxyphenyl)propionamide)).
  - e. 125643-61-0, also known as Antioxidant L135 or 1135 and its equivalents. The chemical name is Benzenepropanoic acid, 3,5-bis(1,1-dimethylethyl)-4-hydroxy-, C7-9-branched alkyl esters.
  - f. Blends of subject antioxidants referred to at (a) to (e).
4. Antioxidant additives in polymers are essential to prevent oxidation. Plastic products are manufactured at high temperatures which compromises the raw polymers, as they are exposed to a process called thermal oxidation. For the polymer to remain stable, antioxidants are introduced during the manufacturing process. They are majorly used in petrochemical companies producing plastics like polyolefins, styrenics, PVC, etc. as the stabiliser/ additives. They are also used during the manufacturing of plastic components using base raw materials like polyolefins, styrenics, PVC, etc and in the rubber, oil, coatings and, lubricant industry to provide long term stability and durability.
  5. The applicant has submitted that the different forms of Antioxidants considered within the PUC definition constitute one product. It is seen that while the specific composition and properties of these antioxidants may differ to meet specific end requirements, these subject antioxidants are primarily used as additives in plastics and share a common functionality. Further, the production equipment, the production process and the resultant characteristics are largely the same. Raw materials and process conditions are specific to each antioxidant. Antioxidants are closely interlinked in trade and usage.
  6. The product under consideration falls under Chapter 29 and 38 of the Customs Tariff Act, 1975. The PUC is mainly entering the Indian market under the following HS codes: 29071990, 29072990, 29096000, 29096090, 29181990, 29182910, 29182990, 29183090, 29189990, 29202910, 29202930, 29202990, 29209000, 29209090, 29241990, 29242990, 29280090, 29309099, 29336990, 29339990, 38112900, 38119000, 38122090, 38123910, and 38123990. The customs classification is indicative only and not binding on the scope of the product under consideration.
  7. The applicant has proposed considering the types of Antioxidants as different PCN, based on the CAS nos.:
    - a) 6683-19-8, also known as Antioxidant 1010 and its equivalents. The chemical name is Pentaerythritol tetrakis(3-(3,5-di-tert-butyl-4-hydroxyphenyl) propionate)
    - b) 2082-79-3, also known as Antioxidant 1076 and its equivalents. The chemical name is Octadecyl-3-(3,5-di-tert-butyl-4-hydroxyphenyl)-propionate
    - c) 31570-04-4, also known as Antioxidant 168 and its equivalents. The chemical name is Tris(2,4-di-tert butylphenyl) phosphite.
    - d) 23128-74-7, also known as Antioxidant 1098 and its equivalents. The chemical name is N,N'-hexane-1,6-diylbis(3-(3,5-di-tert-butyl-4-hydroxyphenyl)propionamide)).

*INITIATION NOTIFICATION*

SETU Case ID: AD/OI/033/2026

- e) 125643-61-0, also known as Antioxidant L135 or 1135 and its equivalents. The chemical name is Benzenepropanoic acid, 3,5-bis (1,1-dimethylethyl)-4- hydroxy-, C7-9-branched alkyl esters.
  - f) Blends of subject antioxidants referred to at (a) to (e).
8. The interested parties are advised to furnish their comments/suggestions on the proposed PCN methodology within 15 days from the date of initiation of the investigation. The interested parties are required to substantiate their comments with relevant evidence.

**B. LIKE ARTICLE**

9. The applicant has claimed that the subject goods, which have been alleged to be dumped in India, are identical to the goods produced by the domestic industry. There are no known differences in the technical specifications, quality, functions and end use of the two products. The Authority notes that the two are *prima facie* technically and commercially substitutable. Therefore, for the purpose of the present investigation, the product produced by the applicant in India is being treated as 'like article' to the subject goods being imported from the subject countries.

**C. SUBJECT COUNTRIES**

10. The subject countries in the present investigation are China PR, Korea RP, and Singapore.

**D. PERIOD OF INVESTIGATION**

11. The applicant has proposed January 2025 – December 2025 (12 months) as the period of investigation. The Authority has considered the period proposed by the applicant for the purpose of the present investigation. The injury period for the investigation will cover the periods 2022-23, 2023-24, 2024-25, and the period of investigation.

**E. DOMESTIC INDUSTRY AND STANDING**

12. The application has been filed by M/s Vinati Organics Limited (VOL) which commenced commercial production in October 2022. There are two other producers in India i.e., HPL Additives Limited (HPL) and Krishna Antioxidants Pvt Ltd. (Cristol).
13. The applicant has certified that it has not imported the subject goods from the subject countries nor is it related to any exporter or importer of the subject goods.
14. On the basis of information available and after due examination, the Authority notes that production by the applicant constitutes "a major proportion" of total Indian production. Thus, the applicant constitutes domestic industry within the meaning of Rule 2(b), and the application satisfies the requirements of standing under Rule 5(3) of the Anti-dumping Rules.

## INITIATION NOTIFICATION

SETU Case ID: AD/OI/033/2026

**F. BASIS OF ALLEGED DUMPING****a) Normal Value for China PR**

15. The domestic industry has cited and relied upon Article 15(a) (i) of China's Accession Protocol and has claimed that China PR should be treated as a non-market economy and that producers from China PR should be directed to demonstrate that market economy conditions prevail in the industry with regard to the manufacture, production, and sale of the product under consideration. If Chinese producers are not able to demonstrate that their costs and price information are market driven, the normal value should be determined in accordance with Para 7 and 8 of Annexure-I to the Anti-dumping Rules.
16. The domestic industry has submitted that it was unable to obtain pricing information or production costs prevailing in market economy country. Further, since the subject goods are being transacted under multiple codes, global trade data for any market economy to third country could also not be considered. Therefore, price from third country to other country, including India, could not be considered for normal value. The domestic industry has thus constructed the normal value based on the best estimates of cost of production in India as per the best information available with reasonable addition for selling, general & administrative expenses, and profits.
17. For the purpose of initiation, the normal value for the product under consideration has been determined based on cost of production in India, duly adjusted for selling, general and administrative expenses and reasonable profits.

**b) Normal Value for Korea RP and Singapore**

18. The domestic industry has claimed that efforts were made to get information/evidence of the price of the subject goods in the domestic market of Singapore and Korea RP, however, data relating to price in Singapore and Korea RP were not available. Such information is also not available with the Authority from any public source. The normal value for Singapore and Korea RP, thus, has been considered on the basis of best estimates of cost of production of subject goods in India along with associated selling, general & administrative expenses, and profits.

**c) Export Price**

19. The CIF price reported for imports into India, as per DGCI&S Systems data has been considered for the determination of export price. Adjustments have been made for ocean freight, marine insurance, credit cost, commission, port and handling charges and inventory carrying cost. There is sufficient *prima facie* evidence with regard to the net export prices claimed by the domestic industry.

## INITIATION NOTIFICATION

SETU Case ID: AD/OI/033/2026

**d) Dumping Margin**

20. The normal value and export price have been compared at ex-factory level which *prima facie* shows that dumping margin is not only above the *de-minimis* level but also significant. There is sufficient *prima facie* evidence that the subject goods from the subject countries are being dumped into the Indian market by the exporters from the subject countries.

**G. INJURY AND CAUSAL LINK**

21. With regards to the injury, the domestic industry has furnished *prima facie* evidence showing injury suffered because of alleged dumped imports. The information concerning imports and economic parameters of the domestic industry over the injury period show that the volume of subject imports from subject countries has increased in absolute terms. Imports in relative terms are significant despite existence of sufficient production capacities with the domestic industry. Applicant has claimed that price depression caused by dumped imports, which has been below the level of cost of sales throughout the injury period, has prevented the domestic industry from increasing its prices to recover the full cost and achieve a reasonable rate of return, resulting in the domestic industry suffering losses. Market share of the domestic industry is relatively low, despite having capacity to cater to Indian demand. While production and sales of the domestic industry have increased over the injury period, capacity with the domestic industry remains grossly underutilized. The level of inventories is significant. It has further been claimed that due to presence of dumped imports, performance has been adversely affected in terms of profitability, cash profits, and ROI. The domestic industry has also provided both actual and normated cost showing that even considering utilisation at optimum levels, the domestic industry is in losses.
22. The information provided by the applicant, *prima facie*, shows injury being caused to the domestic industry due to dumped imports from the subject countries.

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

23. On the basis of the application filed by the applicant in the form and manner prescribed, on the basis of the *prima facie* evidence submitted by the domestic industry, substantiating dumping of the product under consideration originating in or exported from the subject countries, injury to the domestic industry and causal link between such alleged dumping and injury, and in accordance with Section 9A of the Act read with Rule 5 of the AD Rules, the Authority, hereby, initiates an antidumping investigation to determine the existence, degree and effect of any alleged dumping in respect of the subject goods originating in or exported from the subject countries and to recommend the amount of anti-dumping duty, which if levied, would be adequate to remove the injury to the domestic industry.

*INITIATION NOTIFICATION**SETU Case ID: AD/OI/033/2026***I. PROCEDURE**

24. The provisions stipulated in Rule 6 of the AD Rules shall be followed in this investigation.

**J. SUBMISSION OF INFORMATION**

25. All the interested parties are required to register themselves on SETU Portal (<https://setu.dgtr.gov.in>). All communications and submissions from the interested parties shall be uploaded on the SETU portal under their registered name and corresponding case ID- AD/OI/033/2026. 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.

26. The known producers/exporters in subject countries, the government of subject countries 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 the relevant information in the form and manner prescribed within the time limits set out below.

27. 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 any confidential submission before the Authority is required to make a non-confidential version of the same available to the other interested parties.

28. The interested parties are further advised to keep a regular watch on the official website of the Directorate General of Trade Remedies at [www.dgtr.gov.in](http://www.dgtr.gov.in) and SETU portal (<https://setu.dgtr.gov.in>) for any updated information with respect to this investigation. Interested parties are directed to regularly visit the website of DGTR (<https://www.dgtr.gov.in/>) to stay apprised with the 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 discussion/meeting schedule, notice of oral hearing, corrigendum, amendment notifications, and other such information.

**K. TIME LIMIT**

29. Any information relating to the present investigation must be uploaded by the interested parties on the SETU portal (<https://setu.dgtr.gov.in>) under their registered name and corresponding case ID- AD/OI/033/2026. Both versions of each submission, the confidential version (CV) and the non-confidential version (NCV) must be uploaded in the respective designated columns within 37 days from the date on which the non-confidential version of the application filed by the domestic would be circulated by the Authority in SETU or transmitted to the appropriate diplomatic representative of the exporting country as per Rule 6(4) of the AD Rules, 1995. If no information is received within the stipulated time limit or the information received is incomplete, the Authority may record its findings based on the facts available on record and in accordance with the AD Rules, 1995.

*INITIATION NOTIFICATION**SETU Case ID: AD/OI/033/2026*

30. 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 as stipulated in this notification through SETU portal only.
31. The 15-day period to file comments on the scope of the PUC/ PCN Methodology shall run concurrently with the time limit mentioned in this Initiation Notification.
32. Extension due to Modification of PUC/PCN: 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 date of such notification of modified PUC and PCN. Extension of time by 15 days stated in this paragraph is not applicable in instances where there is no change in the PUC, and PCN methodology, after initiation of investigation. Requests for a further extension of time, beyond the 15-day extension (if granted), will ordinarily not be considered except in case of exceptional circumstances, in line with the Rule 6(4) of the AD Rules.
33. Any request for an extension must be submitted by the concerned parties through the SETU portal at least one day before the original deadline specified in this notification. Requests submitted after this time will not be considered.

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

34. Where any party to the present investigation makes confidential submissions or provides information on a confidential basis before the Authority, such party is required to simultaneously submit a non-confidential version of such information in terms of Rule 7(2) of the Rules and in accordance with the relevant trade notices issued by the Authority in this regard. Failure to adhere to the above may lead to rejection of the response/submissions.
35. The parties making any submission (including Appendices/Annexes attached thereto), before the Authority including questionnaire response, are required to file confidential and nonconfidential versions separately.
36. Such 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' information by the Authority, and the Authority shall be at liberty to allow the other interested parties to inspect such submissions.
37. The confidential version shall contain all information that is by nature confidential and/or other information which the supplier of such information claims as confidential. For information that 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.

*INITIATION NOTIFICATION**SETU Case ID: AD/OI/033/2026*

38. 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.
39. 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 as to why such summarization is not possible, must be provided to the satisfaction of the Authority.
40. The interested parties can offer their comments on the issues of confidentiality within 7 days from the date of submission of the non-confidential version of the documents by other interested parties.
41. The Authority may accept or reject the request for confidentiality on 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 authorize its disclosure in generalized or summary form, it may disregard such information.
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.

**M. INSPECTION OF PUBLIC FILE**

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

**N. NON-COOPERATION**

44. 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 interested party as non-cooperative and record its findings based on the facts available and make such recommendations to the Central Government as it deems fit.

**(Amitabh Kumar)**  
**Designated Authority**