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F. No. 6/38/2025  
Government of India  
Ministry of Commerce and Industry  
(Directorate General of Trade Remedies)  
4th Floor, Jeevan Tara Building,  
5 Parliament Street, New Delhi -110001

Dated:29<sup>th</sup> September, 2025

**INITIATION NOTIFICATION**

**Case No. AD(OI)- 33/2025**

**Subject: Initiation of anti-dumping investigation concerning imports of Solar Encapsulants” originating in or exported from South Korea, Thailand and Vietnam – reg.**

1. F. No.6/38/2025: M/s RenewSys India Pvt. Ltd. (hereinafter also referred to as the petitioner) has filed an application before the Designated Authority (hereinafter also referred to as the Authority) in accordance with 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 as amended from time to time (hereinafter also referred to as the Rules) for imposition of Anti-dumping duty on imports of “Solar Encapsulants” (hereinafter also referred to as the subject goods or PUC) from South Korea, Thailand and Vietnam (hereinafter also referred to as the subject countries).

**A. PRODUCT UNDER CONSIDERATION**

2. The Product under Consideration in the present investigation is “Solar Encapsulants”. According to the petitioner, Solar Encapsulants are classified into three types: Poly Olefin Encapsulant (POE), EVA-POE-EVA Encapsulant (EPE), and Ethyl Vinyl Acetate (EVA). The subject goods are polymer-based components used in the manufacturing of solar PV modules. They are used for encapsulation of solar PV cells and perform adhesion and cushioning functions. These are one of the most essential components which keeps glass, cell and backsheet integrated and support the module mechanically during its service life time.
3. These are manufactured using plastic extrusion technology. Polymer based resin is mixed with several other additives and the mixed material is passed through heat and pressure process to convert it in a sheet form. The additives used in the manufacturing of these sheets comprises of a cross linker, an adhesion promoter, UV stabilizer and some other essential materials to impart specific functions. The subject goods fall in the category of plastic sheeting and films made using extrusion technology. The cell connected with string is placed between two sheets. Glass is placed on top of the sheets whereas on the other side, a backsheet is placed in the bottom.

4. The alleged dumped goods are classified under Chapter 39 of the Customs Tariff Act, 1975. The petitioner has submitted that the subject goods are being imported under different codes from company to company and country to country, and the imports are happening under the headings 39019000, 39201019, 39201099, 39202090, 39206190, 39206290, 39209919, 39209932, 39209939, 39209992, 39209999. The customs classification is indicative only and in no way, it is binding upon the product scope.
5. The petitioner has proposed adoption of following Product Control Numbers (PCN) for the purpose of fair comparison between different types/forms of the product.

<b>Type of Encapsulants</b>	<b>Corresponding number in PCN</b>
Poly Olefin Encapsulant	POE
EVA-POE-EVA Encapsulants	EPE
Ethyl Vinyl Acetate	EVA

6. The interested parties to the present investigation may provide their comments on the product under consideration and following propose PCNs (with justification), if any, within 15 days of receiving intimation of the initiation of the investigation. Submissions made without justification will not be considered by the Authority.

**B. LIKE ARTICLE**

7. Rule 2(d) with regard to like article provides as under: -

*"like article" means an article which is identical or alike in all respects to the article under investigation for being dumped in India or in the absence of such article, another article which although not alike in all respects, has characteristics closely resembling those of the articles under investigation;*

8. The applicant has submitted that subject goods which are being dumped into India, are identical to the goods produced by the domestic industry. The applicant has further claimed that there are no differences either in the technical specifications, functions or end-uses of the dumped imports and the domestically produced subject goods. In addition, applicant also claimed that the two are technically and commercially substitutable and hence should be treated as 'like articles' under the Anti-Dumping Rules. Therefore, for the purpose of the present investigation, the subject goods produced by the applicant in India are being treated as 'like article' to the subject goods being imported from the subject countries.

**C. DOMESTIC INDUSTRY & STANDING**

9. Rule 2(b) defines domestic industry as follows:

*“‘domestic industry’ means the domestic producers as a Whole of the Like Article or domestic producers whose collective output) at 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 clamped article, or are themselves importers thereof, in which case such producers shall be deemed not to form part of domestic industry”*

10. The application has been filed by M/s RenewSys India Pvt. Limited. Applicant has claimed that there are other producers in India, viz. Vishakha Renewable Pvt Ltd, Navitas Alpha Renewables, ECAP Green Tech Pvt Ltd, Alishan Green Energy PVT. Ltd, Pixel Redifining Solar, Enerlite Solar Films India Pvt. Ltd. and Fimtech solar Pvt. Ltd. Out of the total domestic production India, the applicant's production share amounts for major proportion of the subject goods. It is noted that two producers namely Vishakha Renewables Pvt. Ltd. and M/s Navitas Alpha Renewables supported the application. The Authority notes that the applicant alone holds a major proportion in the total domestic production in the country. The applicant has claimed that they have neither imported the subject goods from the subject countries nor are they related to any exporter or importer of the subject goods from the subject countries. Therefore, the Authority has considered the petitioner as Domestic Industry within the meaning of the Rule 2(b) of the Rules and the petitioner satisfies the criteria of standing in terms of Rule 5(b) of the Rules supra.

**D. SUBJECT COUNTRIES**

11. The application has been filed in respect of alleged dumping of the subject goods originating in or exported from South Korea, Thailand and Vietnam. Therefore, the subject countries for the present investigation are South Korea, Thailand and Vietnam.

**E. PERIOD OF INVESTIGATION (POI)**

12. The period of investigation for the purpose of the present investigations is 1<sup>st</sup> April 2024 to 31<sup>st</sup> March 2025 (12 months). The injury investigation period shall cover the periods FY 2021-22, FY 2022-23, FY 2023 -24 and the period of investigation.

**F. DUMPING MARGIN COMPUTATION**

**Normal Value for South Korea, Thailand and Vietnam**

13. The applicant has claimed that it did not have access to any evidence of domestic selling price or information regarding actual cost of production of the producers in the subject countries i.e., South Korea, Thailand and Vietnam. Therefore, the Domestic Industry has constructed the normal value based on the best estimates of cost of production in India, duly adjusted with selling, general and administrative expenses, along with a reasonable profit margin. For the purpose of initiation, the Authority has considered normal value considering the cost of production based in India on facts available along with a reasonable profit margin for all the subject countries.

**Export Price**

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

### **Dumping Margin**

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

### **G. ALLEGATION OF INJURY AND CASUAL LINK**

16. Information furnished by the applicant has been considered for assessment of injury to the domestic industry. The applicant has furnished prima facie evidence establishing that the imports have caused material injury to the domestic industry. The imports are undercutting the prices of the domestic industry. The imports have depressed the prices of the domestic industry, and have prevented price increases. This has adversely impacted the profitability of the domestic industry which has deteriorated in the injury period. The capacity utilization of the domestic industry has declined and it has underutilized capacities. The inventories of the domestic industry have increased. There is sufficient prima facie evidence of material injury being caused to the domestic industry due to the dumped imports from the subject countries to justify initiation of anti-dumping investigation.

### **H. INITIATION OF THE INVESTIGATION**

17. On the basis of the duly substantiated 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, substantiating the dumping of product under consideration and subsequent injury to the domestic industry, the Authority hereby initiates an anti-dumping investigation into the alleged dumping and consequent material injury to the domestic industry in accordance with Section 9A of the Act read with Rule 5 of the Rules, to determine the existence, degree, and effect of alleged dumping and to recommend the amount of dumping duty, which if levied would be adequate to remove the injury to the Domestic Industry.

### **I. PROCEDURE**

18. The provisions stipulated in Rule 6 of the Rule shall be followed in the present investigation.

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

19. All communication should be sent to the Designated Authority via email at the email address jd11-dgtr@gov.in, adv11-dgtr@gov.in, dd19-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.
20. The known producers/exporters in the subject countries, the government of the subject countries through its embassy in India, and the importers and users in India who are known to be associated with the subject goods are being informed separately to enable

them to file all the relevant information within the time limits mentioned in this initiation notification. All such information must be filed in the form and manner as prescribed by this initiation notification, the Rules, and the applicable trade notices issued by the Authority.

21. Any other interested party may also make a submission relevant to the present investigation in the form and manner as prescribed by this initiation notification, the Rules, and the applicable trade notices issued by the Authority within the time limits mentioned in this initiation notification.
22. 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.
23. 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.

**K. TIME LIMIT**

24. Any information relating to the present investigation should be sent to the Designated Authority via email at the email addresses [jd11-dgtr@gov.in](mailto:jd11-dgtr@gov.in), [adv11-dgtr@gov.in](mailto:adv11-dgtr@gov.in), [dd19-dgtr@gov.in](mailto:dd19-dgtr@gov.in) and [consultant-dgtr@govcontractor.in](mailto:consultant-dgtr@govcontractor.in) within 30 days from the date of the receipt of the notice as per the 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.
25. 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. 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 ADD Rules, 1995 and such request must come within the time stipulated in this notification.

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

26. 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 same may lead to rejection of the response / submissions
27. Such submissions must be clearly marked as “confidential” or “non-confidential” at the top of each page. Any submission that has been made to the Authority without such markings shall be treated as “non- confidential” information by the Authority, and the Authority shall be at liberty to allow other interested parties to inspect such submissions.
28. The confidential version shall contain all information which is, by nature, confidential, and/or other information which the supplier of such information claims as confidential.

For the information which is claimed to be confidential by nature, or the information on which confidentiality is claimed because of other reasons, the supplier of the information is required to provide a good cause statement along with the supplied information as to why such information cannot be disclosed.

29. 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.
30. The non-confidential summary must be insufficient 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 as to why such summarization is not possible, must be provided to the satisfaction of the Authority.
31. The interested parties can offer their comments on the issues of confidentiality claimed by the interested parties within 7 days from the date of circulation of the non-confidential version of the submissions.
32. Any submission made without a meaningful non-confidential version there of 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.
33. 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 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.
34. The Authority, on being satisfied and accepting the need for confidentiality of the information provided, shall not disclose it to any party without specific authorization of the party providing such information.

**M. INSPECTION OF PUBLIC FILE**

35. 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 submission / response/information might lead to action under Section M of this Initiation Notification.

**N. NON-COOPERATION**

36. In case any interested party refuses access to and otherwise does not provide necessary information within a reasonable period or within the time stipulated by the Authority in this initiation notification or subsequently time period provided through separate

communication, 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.



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