

THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

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Ref. No. AIPMA/ RC/ 2020-945

28th September, 2020

To
Sh. Bidyut Behari Swain
Special Secretary & Director General
Directorate General of Trade Remedies
Ministry of Commerce & Industry
Department of Commerce
Government of India
Jeavan Tara Building, New Delhi, Delhi 110001

Subject: Low cost import of Chapter 39 products leading to huge disadvantage for MSME's

Dear Sir,

Greetings from The All India Plastics Manufacturers' Association (AIPMA)

As you may be aware, AIPMA is the oldest and largest industry association in the country representing more than 15,000 units in India. Our main focus and objective is to assist Indian plastics industry.

This is to bring to your kind notice the recent trade anomalies witnessed by our industry members. Such anomalies if not addressed by the Department at the earliest would be a roadblock for the Indian industry to become self-reliant and Atmanirbhar. In particular, MSME's in India are likely to get affected by such trade difficulties/manipulations.

This has come to our notice that foreign manufacturers having their offices in India are importing semi-finished and finished goods equivalent to the cost of import of raw material. Specifically, this has been witnessed in manufacturing of high performance engineering plastic stock shapes (like rods, plates, tubular bars) and CNC machined components of High Performance Plastics. These High Performance Engineering Plastics are known to exhibit excellent mechanical properties at elevated temperatures and are employed in demanding applications required by Defense, Energy, Space and Aviation segments which are of strategic importance for the country. Indian MSME's are working against many odds and have been catering to the Indian public sector and private sector users as "Make in India" products and thus contributing to the objective of "Atma Nirbhar Bharat".

As mentioned, stock shapes of PEEK, a high performance engineering plastic, are being imported into India at a price which is comparable to imported PEEK raw material price of most reputed raw material producers thus rendering the local

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conversion to become uncompetitive. For your ready reference, we have attached some recent import data for PEEK stock shapes and PEEK raw material.

We strongly believe that such trends are injurious to health of local industry not to mention its implications on India's wish to become self-reliant for its strategic requirements.

You are kindly requested to examine/investigate this and take necessary action including increasing the import duty to safeguard Indian industries specially MSME's.

We look forward to your taking necessary action in this regard.

Yours sincerely,



Chandrakant Turakhia
President

Letter CC to: Shri. Anup Wadhwan, Commerce Secretary, Ministry of Commerce & Industry

Shri. A.K. Sharma, MSME Secretary, Ministry of Micro, Small and Medium Enterprises

Shri. Rajesh Kumar Chaturvedi, Secretary (Chemicals & Petrochemicals), Ministry of Chemicals and Fertilizers

Annexure A

Jul-20

Bill of Entry No	Bill of Entry Date	Importer ID	HS Code	Chapter	Product Discription	Quantity	Unit Quantity	Unit value as per Invoice	INVOICE_CURRENCY	Total Value In FC	Unit Rate in USD	Exchange Rate	Total Value USD (Exchange	Unit_Price in INR
8083732	06-07-2020	0312085206	39072090	39	VICTREX PEEK Polymer 450G (PLASTIC RESIN)	50	KGS	78.09	USD	3904.5	78.09005	76.4	3904.503	5966.08
8193054	17-07-2020	0312085206	39072090	39	VICTREX PEEK Polymer 450G (PLASTIC RESIN)	100	KGS	78.09	USD	7809	78.09001	76.1	7809.001	5942.65

Mar-20

Bill of Entry No	Bill of Entry Date	Importer ID	HS Code	Chapter	Product Discription	Quantity	Unit Quantity	Unit value as per Invoice	INVOICE_CURRENCY	Total Value In FC	Unit Rate in USD	Exchange Rate	Total Value USD (Exchange	Unit_Price in INR
7202799	12-03-2020	0312085206	39072090	39	VICTREX PEEK Polymer 450G (PLASTIC RESIN)	25	KGS	78.09	USD	1952.25	78.08997	74.25	1952.249	5798.18
7202799	12-03-2020	0312085206	39072090	39	VICTREX PEEK Polymer 450G (PLASTIC RESIN)	100	KGS	78.09	USD	7809	78.08997	74.25	7808.997	5798.18
7329062	21-03-2020	0312085206	39072090	39	VICTREX PEEK POLYMER 450G (PLASTIC RESIN)	225	KGS	78.09	USD	17570.25	78.09003	75.75	17570.26	5915.32

Feb-20

Bill of Entry No	Bill of Entry Date	Importer ID	HS Code	Chapter	Product Discription	Quantity	Unit Quantity	Unit value as per Invoice	INVOICE_CURRENCY	Total Value In FC	Unit Rate in USD	Exchange Rate	Total Value USD (Exchange	Unit_Price in INR
7034298	27-02-2020	0312085206	39072090	39	VICTREX PEEK POLYMER 450G (PLASTIC RESIN)	50	KGS	78.09	USD	3904.5	78.09002	72.65	3904.501	5673.24

June-20

Bill of Entry No	Bill of Entry Date	Importer ID	HS Code	Chapter	Product Discription	Quantity	Unit Quantity	Unit value as per Invoice	INVOICE_CURRENCY	Total Value In FC
7814466	03-06-2020	0301045909	39206290	39	PLASTIC SHEETS SUSTAPEEK NATURAL 2 PCS 16 X 620 X 1000 MM	28.86	KGS	6800	INR	196248
7814466	03-06-2020	0301045909	39169027	39	PLASTIC ROD SUSTAPEEK NATURAL 180 PCS 16 X 3000 MM	153	KGS	6400	INR	979200
8008853	26-06-2020	0301045909	39209991	39	PLASTIC SHEETS SUSTAPEEK NATURAL 2 PCS 3 X 1000 X 2000 MM	16.32	KGS	8960	INR	146227.2

May-20

Bill of Entry No	Bill of Entry Date	Importer ID	HS Code	Chapter	Product Discription	Quantity	Unit Quantity	Unit value as per Invoice	INVOICE_CURRENCY	Total Value In FC
7695859	18-05-2020	0301045909	39161090	39	PLASTIC ROD SUSTAPEEK NATURAL 50 PCS 8 X 1000 MM	3.5	KGS	6000	INR	21000
7754101	26-05-2020	0301045909	39161090	39	PLASTIC ROD SUSTAPEEK NATURAL 150 PCS 10 X 1000 MM	16.5	KGS	6800	INR	112200
7754101	26-05-2020	0301045909	39161090	39	PLASTIC RODS SUSTAPEEK NATURAL 5 PCS DIA 35 X 1000 MM	6.7	KGS	6800	INR	45560
7754101	26-05-2020	0301045909	39206290	39	PLASTIC SHEETS SUSTAPEEK NATURAL 5 PCS 6 X 620 X 1000 MM	27.2	KGS	6800	INR	184960
7754101	26-05-2020	0301045909	39161090	39	PLASTIC RODS SUSTAPEEK NATURAL 50 PCS DIA 25 X 1000 MM	34.5	KGS	6800	INR	234600
7754101	26-05-2020	0301045909	39161090	39	PLASTIC RODS SUSTAPEEK NATURAL 100 PCS DIA 8 X 1000 MM	7	KGS	6800	INR	47600
7754101	26-05-2020	0301045909	39161090	39	PLASTIC ROD SUSTAPEEK GF 30 NATURAL 8 PCS 25 X 1000 MM	6.4	KGS	8400	INR	53760
7788197	30-05-2020	0301045909	39169027	39	PLASTIC ROD SUSTAPEEK NATURAL 3 PCS 55X1000 MM	10.08	KGS	6000	INR	60480
7788197	30-05-2020	0301045909	39169027	39	PLASTIC ROD SUSTAPEEK NATURAL 1 PCS 6X1000 MM	1	KGS	296	INR	296
7788197	30-05-2020	0301045909	39169027	39	PLASTIC ROD SUSTAPEEK NATURAL 10 PCS 20 X 1000 MM	4.4	KGS	6000	INR	26400
7788197	30-05-2020	0301045909	39169027	39	PLASTIC ROD SUSTAPEEK NATURAL 1 PCS 80 X 1000 MM	6.94	KGS	6000	INR	41640

Mar-20

Bill of Entry No	Bill of Entry Date	Importer ID	HS Code	Chapter	Product Discription	Quantity	Unit Quantity	Unit value as per Invoice	INVOICE_CURRENCY	Total Value In FC
7073471	02-03-2020	0301045909	39169027	39	PLASTIC ROD SUSTAPEEK NATURAL 5 PCS DIA 55 X 1000 MM	16.8	KGS	6000	INR	100800
7073471	02-03-2020	0301045909	39169027	39	PLASTIC ROD SUSTAPEEK NATURAL 50 PCS DIA 6 X 1000 MM	2	KGS	6000	INR	12000
7073471	02-03-2020	0301045909	39169027	39	PLASTIC ROD SUSTAPEEK NATURAL 10 PCS DIA 30 X 1000 MM	9.8	KGS	6800	INR	66640
7073471	02-03-2020	0301045909	39169027	39	PLASTIC ROD SUSTAPEEK NATURAL 15 PCS DIA 22 X 1000 MM	7.95	KGS	6000	INR	47700
7073471	02-03-2020	0301045909	39169027	39	PLASTIC ROD SUSTAPEEK NATURAL 3 PCS DIA 75 X 1000 MM	18.42	KGS	6000	INR	110520
7073471	02-03-2020	0301045909	39169027	39	PLASTIC ROD SUSTAPEEK NATURAL 5 PCS DIA 45 X 1000 MM	10.95	KGS	6000	INR	65700
7073471	02-03-2020	0301045909	39169027	39	PLASTIC ROD SUSTAPEEK NATURAL 2 PCS DIA 65 X 1000 MM	9.2	KGS	6000	INR	55200
7157840	07-03-2020	0301045909	39209991	39	PLASTIC SHEETS SUSTAPEEK NATURAL 1 PCS 20 X 620 X 1000 MM	17.62	KGS	6800	INR	119816
7157840	07-03-2020	0301045909	39169027	39	PLASTIC RODS SUSTAPEEK NATURAL 6 PCS DIA 60 X 1000 MM	24.9	KGS	6358	INR	158304

7157840	07-03-2020	0301045909	39169027	39	PLASTIC RODS SUSTAPEEK NATURAL 5 PCS DIA 45 X 1000 MM	11.75	KGS	5591	INR	65700
7209255	12-03-2020	0301045909	39169027	39	PLASTIC ROD SUSTAPEEK NATURAL 10 PCS DIA 60 X 1000 MM	38.8	KGS	6000	INR	232800
7209255	12-03-2020	0301045909	39209991	39	PLASTIC SHEETS SUSTAPEEK NATURAL 1 PCS 20 X 620 X 1000 MM	17.62	KGS	6000	INR	105720
7209255	12-03-2020	0301045909	39209991	39	PLASTIC SHEETS SUSTAPEEK NATURAL 2 PCS 12 X 620 X 1000 MM	21.76	KGS	6000	INR	130560
7209255	12-03-2020	0301045909	39169027	39	PLASTIC ROD SUSTAPEEK NATURAL 200 PCS DIA 6 X 1000 MM	8	KGS	6400	INR	51200
7209255	12-03-2020	0301045909	39169027	39	PLASTIC ROD SUSTAPEEK NATURAL 100 PCS DIA 8 X 1000 MM	7	KGS	6400	INR	44800
7209255	12-03-2020	0301045909	39209991	39	PLASTIC SHEETS SUSTAPEEK NATURAL 2 PCS 10 X 620 X 1000 MM	18	KGS	6007	INR	108120
7209255	12-03-2020	0301045909	39209991	39	PLASTIC SHEETS SUSTAPEEK NATURAL 2 PCS 25 X 620 X 500 MM	22.12	KGS	6000	INR	132720
7209255	12-03-2020	0301045909	39209991	39	PLASTIC SHEETS SUSTAPEEK NATURAL 2 PCS 8 X 620 X 1000 MM	14.76	KGS	6000	INR	88560
7209255	12-03-2020	0301045909	39169027	39	PLASTIC ROD SUSTAPEEK NATURAL 50 PCS DIA 16 X 1000 MM	14.5	KGS	6000	INR	87000
7209255	12-03-2020	0301045909	39169027	39	PLASTIC ROD SUSTAPEEK NATURAL 5 PCS DIA 150 X 300 MM	36.1	KGS	6335	INR	228696
7252346	16-03-2020	0301045909	39169027	39	PLASTIC ROD SUSTAPEEK NATURAL 2 PCS DIA 75 X 1000 MM	12.28	KGS	6400	INR	78592