

THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

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Vice President (West Zone)

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Ref:- AIPMA/ADD/20-21/12

14th June 2021

**To,
Designated Authority
Directorate General of
Trade Remedies Ministry of Commerce
& Industry Department of Commerce
4th Floor, Jeevan Tara Building,
5, Parliament Street, Patel Chowk
New Delhi – 110001**

Subject:- Anti-Dumping Investigation against Import of Natural Mica based Pearl Industrial Pigments excluding cosmetic grade originating in or exported from China PR – Comments on Disclosure Statement

Dear Sir / Madam,

AIPMA is the national level industry association representing more than 15000 Industry members from across the country. 90% of our members are MSME's. AIPMA looks after the interest of plastics processing industry. Plastic processing industry contributes more than Rs. 3 Lakhs crore per annum to India's GDP and employs more than 5 million people.

Please find our representation on the Anti-Dumping Investigations (**File No. 6/8/2020-DGTR and 7/28/2020**) on "Natural Mica based Pearl Industrial Pigments". 90% of the AIPMA members of MSME's.

We strongly oppose any move by the Government to impose anti-dumping duty on "Natural Mica based Pearl Industrial Pigments excluding cosmetic grade" as this will make the finished goods manufactured by the small units expensive and uncompetitive.

We would like to inform you that there is only one manufacturer in India, Sudarshan Chemical Industries Ltd. (SCIL). Unfortunately, they neither can meet the demand of the country nor are they able to offer the complete range. Levying anti-dumping duty on imports from China will give undue advantage to SCIL and create a monopoly. It could result in higher prices and damage both domestic and export business. These pigments are used across various industries such as plastics, inks and paints; and undue advantage could cause irreversible damage both to domestic and exports of all 3 and innumerable downstream industry. In our experience, before the Chinese products entered the Indian Market, Pearl Pigments were imported from Europe and the USA. The prices of imports from Europe and USA were very high. SCIL had sufficient time to scale up and innovate, however they failed to capitalize and as a result lagged.



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If Government of India decides to levy ADD on import of Natural Mica based Pearl Industrial Pigments excluding cosmetic grade, this will ultimately result in protecting interests of only the petitioner and specially one company i.e. Sudarshan Chemical Industries Ltd. (SCIL). As the petitioner is the only producer in the domestic market, there is a high likelihood that it would dominate the market and would create barriers for market entry, which is harmful to the competitive environment and healthy development of the industry of India. Besides, the imposition of the anti-dumping duty would unnecessarily cut the source of regular supply of the product and would cause negative impacts on the public interests. It is important to mention that the Petitioner is already dominating the market by inflating the prices of Natural Mica based Pearl Industrial Pigments frequently.

It is further submitted that imposition of anti-dumping duty, if any, on Natural Mica based Pearl Industrial Pigments will be contrary to the policy of Government of India, on MSME sector after COVID-19 pandemic and also enumerated in the latest Budget for Financial Year 2021-22.

Larger public interest would be served if the present investigation is immediately terminated as the data in the application, does not warrant imposition of an anti-dumping duty in this case.

The above is for your kind consideration.

With best regards,

Chandrakant Turakhia
President