

INDIAN HOME & PERSONAL CARE INDUSTRY ASSOCIATION



CIN : U91100MH2011NPL217250
(Registration u/s 25(1) (a) & (b) of Indian Companies Act, 1956)



June 27, 2017

To,
The Designated Authority,
Directorate General of Anti-Dumping & Allied Duties,
Department of Commerce
4th Floor, Jeevan Tara Building,
5 Parliament Street,
New Delhi – 110001.

Kind Attn: Dr. Inder Jit Singh, Additional Secretary & Designated Authority

Sub: IHPCIA members' views on Intimation Notification on Saturated Fatty Alcohol dated. 24.04.2017 Case No. OI/24/2017

Dear Dr. Inder Jit Singh,

Indian Home & Personal Care Industry Association (IHPCIA) (www.ihpcia.org) is India's premier HPC Industry Association & the voice of the industry represented by members from the FMCG and MSME sectors. The Association incorporated under Section 25 of the Companies Act also has five affiliate small scale industry Associations from West Bengal, Tamil Nadu, Maharashtra, Gujarat and Madhya Pradesh as members with around thirteen hundred and fifty (1350) members. The Association represents the views of its members.

Our Members are concerned with the Intimation of Anti-Dumping Investigation concerning imports of "Saturated Fatty Alcohols" originated in or exported from Indonesia, Malaysia, Thailand and Saudi Arabia dated 24th April, 2017 (Case no. IO/24/2017) issued by the designated authority.

Please note below IHPCIA's views on behalf our members about this investigation:

- a. VVF India Limited is the only petitioner seeking the imposition of anti-dumping duties on imports of saturated fatty alcohols originating in or exported from Indonesia, Malaysia, Thailand and Saudi Arabia (hereinafter referred to as the "Subject Countries". This investigation does not appear to enjoy the support of the other manufacturer of Saturated Fatty Alcohol in India;
- b. VVF claims that its saturated fatty alcohol manufacturing operations was injured by the alleged dumped imports during the period of investigation. We find this claim to be astounding as safeguard duty on imports of saturated fatty alcohol from, inter alia, Indonesia, was imposed since August 2014. It is our view that the safeguard duty enabled VVF to a cost advantage as compared to Indian exporters of saturated fatty alcohol;

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- c. If despite this cost advantage, VVF still claims to be injured, then VVF's situation could be for reasons other than the imports of saturated fatty alcohol into India; and
- d. The imposition of anti-dumping duties will adversely affect producers of soaps, detergents, toothpastes and shampoos in India as well as Indian consumers as the price of home and personal use produce will likely to increase. Thus, the imposition of anti-dumping duties on imports of saturated fatty alcohols originating from subject countries would be against the interest of our members and consumers.

We request you to record our views while initiating the Anti – Dumping duty on imports of Saturated Fatty Alcohols, originating in or exported from subject countries.

Yours truly,

For Indian Home & Personal Care Industry Association

Sanjay Trivedi
Founder Director

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