

Report on Conclusion of Sunset Review of Antidumping Duties Imposed on Dumped Imports of
Coated Bleached Paperboard Originating in and/or Exported from China into Pakistan



**Government of Pakistan
National Tariff Commission**

Report

On

Conclusion of

**Sunset Review of Anti-dumping Duties Imposed on Dumped Imports of Coated
Bleached Paperboard / Folding Box Paperboard with White Back from the
People's Republic of China**

A.D.C No. 44/2016/NTC/CCB/SSR
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A. **INTRODUCTION**

The National Tariff Commission (the “Commission”) having regard to the Agreement on Implementation of Article VI of the General Agreement on Tariffs and Trade 1994 (the “Agreement on Antidumping”), Anti-Dumping Duties Act, 2015 (the “Act”) and the Anti-Dumping Duties Rules, 2001 (the “Rules”) relating to the investigation/review and determination of dumping of goods into the Islamic Republic of Pakistan (“Pakistan”), material injury to the domestic industry caused by such imports, and imposition of anti-dumping duties to offset the impact of such injurious dumping, and to ensure fair competition thereof. Section 58 of the Act relates to review of anti-dumping duties imposed on dumped imports of the investigated products.

2. Having regard to the Section 58(3) of the Act, a definitive anti-dumping duty shall not expire if the Commission determines in a review that the expiry of such anti-dumping duty would be likely to lead to continuation or recurrence of dumping and injury.

3. The Commission has conducted sunset review of anti-dumping duties imposed on dumped imports of Coated Bleached Paperboard / Folding Box Paperboard with White Back (“Coated Bleached Paperboard”) classified under PCT Heading Nos. 4810.9200 & 4810.9900 from the People’s Republic of China (“China”) under the Act and the Rules. This report on conclusion of the review has been issued in accordance with Section 39(5) of the Act and Article 12.2 of the Agreement on Antidumping.

4. In terms of Section 62(2) of the Act, the sunset review under Section 58 of the Act shall normally be completed within twelve months from its initiation. The sunset review was initiated on February 25, 2022.

B. **BACKGROUND**

5. **Anti-dumping Duties**

The Commission imposed following definitive anti-dumping duties on dumped imports of Coated Bleached Paperboard, importable from China, for a period of five years effective from February 28, 2017 on the basis that the domestic industry suffered material injury during the Period of Investigation (“POI”) on account of increase in volume of dumped imports, price undercutting, price depression, decline in production, sales, market share, productivity, capacity utilization, profitability, return on investment and negative effect on salaries and wages per MT, growth and ability to raise capital:

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Table – I
Definitive Anti-Dumping Duty Rates

Exporter/Foreign Producer from China	Antidumping Duty Rates (%)
(1)	(2)
Ningbo Asia Pulp & Paper Co Ltd.	28.74
Ningbo Zhonghua Paper Co., Ltd.	
Guangxi Jingui Pulp & Paper Co Ltd.	
Gold East (Hong Kong) Trading Co., Ltd.	
All others	29.02

C. PROCEDURE

6. The procedure set out below has been followed with regard to this sunset review in accordance with the Section 62 of the Act.

7. Notice of Impending Expiry of Definitive Anti-dumping Duties

The Commission imposed definitive anti-dumping duties on dumped imports of Coated Bleached Paperboard importable from China for a period of five years effective from February 28, 2017. However, in terms of Section 58(3) of the Act, a definitive anti-dumping duty shall not expire if the Commission determines in a review initiated before expiry of anti-dumping duty that the expiry of such anti-dumping duty would be likely to lead to continuation or recurrence of dumping of the investigated product and injury to the domestic industry. The Commission published a notice of impending expiry of anti-dumping duties in this case in Official Gazette and national press in accordance with Section 58 (2) of the Act on November 23, 2021.

8. Receipt of Application

The Commission received an application on January 06, 2022 under Section 58 of Act for review of the anti-dumping duties imposed on dumped imports of Coated Bleached Paperboard from China. The application was filed by M/s. Century Paper & Board Mills Ltd. and M/s Bulleh Shah Packaging (Pvt.) Ltd. (the “Applicants”), who are domestic producers of Coated Bleached Paperboard. The application was in response to the notice of impending expiry of the anti-dumping duties imposed on dumped imports of Coated Bleached Paperboard into Pakistan originating in and /or exported from China. The Applicants contended that expiry of anti-dumping duties on Coated Bleached Paperboard would likely to lead to continuation or recurrence of dumping of Coated Bleached Paperboard from China and injury to the domestic industry producing Coated Bleached Paperboard.

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9. **Evaluation and Examination of the Application**

Examination of the application showed that it met the requirements of Section 58(3) of the Act as they contained sufficient evidence of likelihood of continuation or recurrence of dumping of Coated Bleached Paperboard from China and injury to the domestic industry.

10. **Domestic Industry**

10.1. The domestic industry manufacturing Coated Bleached Paperboard comprises of two units i.e., M/s. Century Paper & Board Mills Ltd. and M/s Bulleh Shah Packaging (Pvt.) Ltd. having installed production capacity of *** MT and *** MT respectively. The combined installed production capacity of M/s. Century Paper & Board Mills Ltd. and M/s Bulleh Shah Packaging (Pvt.) Ltd., is 78,500 MT per annum.

10.2 M/s Bulleh Shah Packaging (Pvt.) Ltd. is in process of increasing capacity of its Coated Bleached Paperboard Mills to *** MT which will be operational in last quarter of the year 2022.

10.3 The Applicants in their application claimed that recently two other producers of Paperboard i.e. M/s Synergy Paper & Board Mill and M/s Fazal Paper Mill have also started producing Coated Bleached Paperboard. The Commission on March 01, 2022, sent questionnaire to M/s Synergy Paper & Board Mill and M/s Fazal Paper Mill with the request to provide data. The Commission send reminders on April 20, 2022 and July 15, 2022, however, both companies did not provide requisite information to the Commission.

11. **Standing of the Application**

11.1 The application fulfils the requirements of Section 24 of the Act, which require the Commission to assess the standing of the domestic industry on basis of the degree of support for or opposition to the application expressed by the domestic producers of the like product.

11.2 In terms of Section 24(1) of the Act, an application shall be considered to have been made by or on behalf of the domestic industry only if it is supported by those domestic producers whose collective output constitutes more than fifty percent of the total production of a domestic like product produced by that portion of the domestic industry expressing either support for or opposition to the application. Furthermore, Section 24(2) of the Act provides that no investigation shall be initiated when domestic producers expressly supporting an application account for less than twenty-five percent of the total production of domestic like product produced by the domestic industry.

11.3 The application has been filed by the M/s. Century Paper & Board Mills Ltd. and M/s Bulleh Shah Packaging (Pvt.) Ltd. whose collective output constitutes 100 percent of domestic production of domestic like product, as the Applicants are the major units manufacturing Coated Bleached Paperboard in Pakistan. Therefore, the application is considered to be made by the domestic industry, as it is supported by those domestic producers whose collective production constitutes 100 percent of the total production of the like product.

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Table – II
Standing of Application during POR

S. No	Unit Name	Share in total production (Oct 2020-Sep 2021)	Status
(1)	(2)	(3)	(4)
i.	M/s. Century Paper & Board Mills Ltd	53.3%	Applicant
ii.	M/s Bulleh Shah Packaging (Pvt) Ltd	46.7%	Applicant
	Total	100.0%	

Source: the Applicants

11.4 On the basis of the above information and analysis it is determined that the application is made on behalf of the domestic industry as it fulfils the requirement of Section 24 of the Act.

12. Applicants' Views

The Applicants, inter alia, raised the following issues in application regarding likely continuation or recurrence of dumping of Coated Bleached Paperboard from China and injury to the domestic industry caused therefrom:

- (a) Coated Bleached Paperboard produced and exported by China and Coated Bleached Paperboard produced in Pakistan by the domestic industry are like products;
- (b) After imposition of definitive anti-dumping duties, exporters/producers from China reduced their exports of Coated Bleached Paperboard to Pakistan. Therefore, it is likely to result into recurrence of dumping if anti-dumping duties are terminated; and
- (c) Likely recurrence of dumping of Coated Bleached Paperboard from China into Pakistan is likely to cause material injury to the domestic industry producing Coated Bleached Paperboard, mainly through:
 - (i) likely increase in volume of dumped imports;
 - (ii) likely decline in market share;
 - (iii) likely negative effects on prices of domestic like product;
 - (iv) likely negative effect on output;
 - (v) likely negative effect on capacity utilization;
 - (vi) likely negative effect on profit;
 - (vii) likely negative effect on employment and wages; and
 - (viii) likely negative effect on growth, investment.

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13. **Initiation of Sunset Review**

13.1 Upon examination of the application, the Commission established that it met requirements of Section 58 of the Act. Therefore, the Commission initiated sunset review on February 25, 2022 to determine whether there is likelihood of continuation or recurrence of dumping of Coated Bleached Paperboard from China and material injury to the domestic industry.

13.2 In terms of Section 27 of the Act, the Commission issued a notice of initiation of Sunset Review in accordance with Section 27 of the Act, which was published in the Official Gazette of Pakistan and in two widely circulated national newspapers (“The Express Tribune” and “Daily Khabrain”) on February 25, 2022.

13.3 The Commission notified Embassy of China in Islamabad of the initiation of the review (by sending a copy of the notice of initiation) on February 28, 2022 with a request to forward it to all exporters/ producers involved in production, sales and export of Coated Bleached Paperboard in China. Copy of the notice of initiation was also sent to exporters/ producers directly (whose addresses were available with the Commission), Pakistani importers and other domestic producers on February 28, 2022 and March 01, 2022.

13.4 In accordance with Section 28 of the Act, on February 28, 2022 a copy of full text of the written application (non-confidential version) was sent to all exporters/producers, whose complete addresses were available with the Commission and to the Embassy of China in Islamabad with a request to forward it to all exporters/producers in China involved in production, sale and/or export of Coated Bleached Paperboard.

14. **Product under Review**

14.1 The product under review is Coated Bleached Paperboard/ One Side Coated Folding Box Paperboard with White Back Manila pulp or ISC Ivory Paperboard with White Back Manila Pulp (180gsm-400gsm) Pakistan excluding One Sided Aseptic Coated Paperboard (Clay Coated) and Two-Sided Coated Bleached Paperboard (classified under PCT Headings Nos. 4810.9200 & 4810.9900) exported by the exporters / producers from China. The product under review is generally used for folding cartons of consumer & industrial products like cigarettes, pharmaceuticals, tissue boxes, cosmetics, food and spices etc.

14.2 Following is the tariff structure of Coated Bleached Paperboard for the period Oct 2020-Sep 2021:

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Table – III
Tariff Structure of Coated Bleached Paperboard

PCT Code	Description	CD	ACD	RD	Concessions/ FTA Rates
(1)	(2)	(3)	(4)	(5)	(6)
4810.9200	- Other Paper and Paperboard -- Multi Ply	20%	7%*	0%	Fifth Schedule Part-III C.D 15%, CH 20%, MY 20%, LK FTA Conc 100%
4810.9900	-- Other	20%	7%*	0%	Fifth Schedule Part-III CD 0%, CH 20%, MY 20%, LK FTA Conc 100%

Source: Pakistan Customs Tariff 2020-21 & 2021-22

*ACD vide SRO 845(I)/2021 reduced from 7% to 6% w.e.f July 01, 2021

15. Domestic like Product

15.1 The domestic like product, produced by the domestic industry is Coated Bleached Paperboard/ One Side Coated Folding Box Paperboard with White Back Manila pulp or ISC Ivory Paperboard with White Back Manila Pulp (180gsm-400gsm) excluding One Sided Aseptic Coated Paperboard (Clay Coated) and Two-Sided Coated Bleached Paperboard (classified under PCT Headings Nos. 4810.9200 & 4810.9900). The product under review is generally used for folding cartons of consumer & industrial products like cigarettes, pharmaceuticals, tissue boxes, cosmetics, food and spices etc.

15.2 The Commission in its original investigation had determined that the investigated product and the domestic like product were like products.

16. Period of Review

The period of review (“POR”) for sunset review would be the last three years from Oct 01, 2018 to Sep 30, 2021. The Applicants have submitted information and evidence for this period to determine likely recurrence or continuation of dumping and likely recurrence or continuation of material injury to the domestic industry in accordance with provisions of Section 58 of the Act.

17. Information/Data Gathering

17.1 The Commission sent questionnaires to all known exporters/producers of China on February 28, 2022, asking them to respond within 37 days of the dispatch of questionnaires. None of the exporters/producers of Coated Bleached Paperboard from China responded to the questionnaire and provided necessary information.

17.2 None of the importers responded to the questionnaire and provided necessary information.

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17.3 The Commission has an access to the import statistics of Pakistan Revenue Automation Limited (“PRAL”), the data processing arm of the Federal Board of Revenue, Government of Pakistan. For the purpose of these review, the Commission has also used import data obtained from PRAL’s database in addition to the information provided by the Applicants, exporters/ producers.

17.4 Thus, the Commission has sought from all available sources the relevant data and information deemed necessary for the purposes of determination of likelihood of continuation or recurrence of dumping of Coated Bleached Paperboard and injury to the domestic industry. In terms of Rule 12 of the Rules, during the course of this review, the Commission satisfied itself as to the accuracy of information supplied by the interested parties to the extent possible.

18. **Views/Comments and Hearing**

18.1 All interested parties known to the Commission were invited, through the Notice of Initiation of this sunset review, for their views /comments and to submit information and documents (if any) with regard to this sunset review. In response, none of the parties submitted their views/comments relating to antidumping duties imposed on dumped imports of the product under review from China.

18.2 Upon request of importers, under Rule 14 of the Rules, a virtual Hearing via Zoom Application in this sunset review was held on May 18, 2022. All interested parties were invited to attend the hearing. The Commission during the hearing, requested all the participants to submit their views/ comments/ information/ data in writing within ten days of Hearing. M/s. Khairullah Paper & Board Works Limited and M/s. Pakistan Packages Private Limited submitted their comments. The record note of the Hearing is available in the public file for review and copy of the interested parties.

18.3 All the interested parties were advised to confirm their participation in the Hearing seven days before the scheduled date i.e. by May 11, 2022. However, M/s Salman Paper Products Pvt. Ltd. and M/s Madiha International Pvt. Ltd. informed the Commission for participation on the date of Hearing i.e. May 18, 2022. Therefore, the Commission provided another opportunity of Hearing to M/s Salman Paper Products Pvt. Ltd. and M/s Madiha International Pvt. Ltd. on July 06, 2022 at 11:30 am on Zoom Application.

18.4 During the hearings, the interested parties raised the following issues;

- (a) Normal value in the original investigation;
- (b) Dumping determination in the original investigation; and
- (c) Other factors determined in the original investigation

18.5 The issues of determination of normal value, dumping margins and other factors highlighted by the importers during public hearing pertains to the final determination of the original investigation and is sub-judice in the Anti-Dumping Appellate Tribunal Islamabad.

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Anti-Dumping Appellate Tribunal Islamabad has not yet passed any decision on the above issues.

18.6 The Commission has carefully reviewed all issues raised by the interested parties during the course of this sunset review and has reached to the conclusion of this review after consideration of all information, evidence, views and comments. The response of the Commission on the issues highlighted by the importers is given at Annexure-I.

19. **Verification of Information**

19.1 In terms of Sections 32(4) and 35 of the Act and Rule 12 of the Rules, the Commission, during the course of the investigation/review, satisfied itself as to the accuracy of information supplied by the interested parties to the extent possible.

19.2 In order to verify the information/data provided by the Applicants and to obtain further information (if any), the concerned officers of the Commission conducted on-the-spot verifications at the offices and plant of the M/s. Century Paper & Board Mills Ltd from May 19-20, 2022, and M/s Bulleh Shah Packaging (Pvt) Ltd from June 20-21, 2022. Reports of the on-the-spot verifications are made available to the interested parties by placing them in the public file.

20. **Public File**

The Commission, in accordance with Rule 7 of the Rules, has established and maintained a public file of this sunset review at its office. This file remains available to the interested parties for review and copying from Monday to Thursday between 1100 hours to 1300 hours throughout the review investigation. This file contains non-confidential versions of the application, responses to the questionnaires, submissions, notices, on-the-spot investigation reports, correspondence, and other documents for disclosure to the interested parties.

21. **Confidentiality**

21.1 In terms of Section 31 of the Act, the Commission shall keep confidential any information submitted to it, which is by nature confidential, or determined by the Commission to be of confidential nature for any other reason, or provided as confidential by parties to an investigation upon good cause shown, to be kept confidential.

21.2 The Applicants and exporters/ producers have requested the Commission to keep confidential the information, which is by nature confidential in terms of Section 31 of the Act. This information includes data relating to sales, sale prices, cost to make and sell, inventories, production, profit/(loss), return on investment, cash flow, growth, investment, salaries and wages, number of employees and capacity etc. In addition to this, Applicants and other interested parties also provided certain information on confidential basis, as its disclosure would cause adverse effect upon them.

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21.3 Pursuant to requests made by the Applicants, exporters/producers and other interested parties to treat certain information as confidential, the Commission has determined confidentiality in light of Section 31 of the Act and for the reasons that disclosure of such information may be of significant competitive advantage to the competitor, or because its disclosure would have a significant adverse effect upon the interested parties providing such information.

21.4 However, in terms of Section 31(5), non-confidential summaries of all confidential information, which provide reasonable understanding of the substance, have been placed in the public file.

22. **Disclosure of Essential Facts**

22.1 In terms of Rules 14(8) of the Rules, the Commission disclosed essential facts, and in this context circulated a Statement of Essential Facts (the “SEF”) on July 25, 2022 to all interested parties including Applicants, exporters/producers from China, importers and the Embassy of China in Pakistan,

22.2 Under Rule 14(9) of the Rules, the interested parties were required to submit their comments (if any) on the facts disclosed in SEF, in writing, not later than fifteen days of such disclosure. JA Legal, representative of M/s Khairullah Paper & Board Works (Pvt.) Ltd. and Pakistan Packages (Pvt) Ltd. submitted its comments on SEF which were considered while concluding this sunset review (refer Annexure-I).

23. **Determination of Likelihood Recurrence or Continuation of Dumping**

Following factors have been considered by the Commission in determining likely recurrence or continuation of dumping of the product under review. Information on these factors has been gathered from different sources including the Applicants and PRAL:

- (a) Whether exporters/ producers from China stopped or continued exporting the product under review to Pakistan after imposition of anti-dumping duties;
- (b) Whether exporters from China have developed other export markets after imposition of anti-dumping duties;
- (c) Changes in production capacities, quantities produced and inventories of the product under review of foreign exporters/ producers after imposition of anti-dumping duties; and
- (d) Trade remedial actions taken by other countries on exports of Coated Bleached Paperboard from China during last five years.

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24. **Whether Exporters/ Producers from China Stopped or Continued Exporting to Pakistan the Product Under Review after Imposition of Antidumping Duties**

24.1 Investigation on whether exporters/ producers from China stopped or continued exporting to Pakistan the product under review to Pakistan after imposition of anti-dumping duties has revealed that the exporters/producers from China continued exporting the product under review after imposition of anti-dumping duties. However, share of the product under review in total imports of Coated Bleached Paperboard (exported by the exporters/ producers from China to Pakistan during the period of review) declined significantly compared to its share in total imports during the period of original investigation. Following table shows the volume of dumped imports of Coated Bleached Paperboard from China and other sources:

Table – IV
Imports of Coated Bleached Paperboard

(MT)

Period	Imports From		
	Dumped Source	Other Source	Total Imports
(1)	(2)	(3)	(4)
Oct 2014-Sep 2015*	57,625 (99.6%)	231 (0.4%)	57,856 (100%)
Oct 2018-Sep 2019	2,933 (20%)	11,593 (80%)	14,526 (100%)
Oct 2019-Sep 2020	2,406 (40%)	3,633 (60%)	6,039 (100%)
Oct 2020-Sep 2021	1,405 (11%)	11,770 (89%)	13,175 (100%)

* POI of Original Investigation.

Source: PRAL

24.2 The above table shows that the share of dumped imports from China during last year of the original POI (Oct 2014-Sep 2015) was 99.6 percent of total imports of Coated Bleached Paperboard, while share of Coated Bleached Paperboard from other sources was only 0.4 percent of total imports during same period. After imposition of anti-dumping duties on dumped imports of Coated Bleached Paperboard from China, volume of dumped imports from China reduced significantly from 57,625 MT in Oct 2014- Sep 2015 to 2,933 MT during Oct 2018- Sep 2019. During last two years of POR i.e. Oct 2019- Sep 2020 and Oct 2020 - Sep 2021, volume of dumped imports from China further decreased to 2,406 MT and 1,405 MT respectively.

24.3 Substantial reduction in the volume of dumped imports of Coated Bleached Paperboard from China was due to imposition of anti-dumping duties. In case antidumping duties are terminated on dumped import of Coated Bleached Paperboard from China, there is likelihood that the exporters/producers will again start dumping into Pakistan.

24.4 On the basis of above information and analysis, the Commission has reached to the conclusion that after imposition of anti-dumping duties on dumped exports of Coated Bleached Paperboard from China have substantially decreased. Therefore, in case anti-dumping duties imposed on the dumped imports of Coated Bleached Paperboard from China are terminated, there is likelihood of its recurrence of dumping into Pakistan.

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25. **Whether Exporters from China have Developed Other Export Markets after Imposition of Antidumping Duties**

25.1 The Commission has analysed the trend of exports of Coated Bleached Paperboard from China to reveal whether the exporters from China have developed others markets after imposition of anti-dumping duties. Following table shows exports of Coated Bleached Paperboard from China in the period of original POI and during the POR. Information on exports of Coated Bleached Paperboard from China has been obtained from International Trade Centre website (www.trademap.org):

Table – V
Chinese Exports of Paperboard*
 (HS Codes 4810.9200 & 4810.9900)

(MT)

Countries	Chinese Exports of Paperboard*				
	Oct 2014- Sep 2015**	Oct 2018- Sep 2019	Oct 2019- Sep 2020	Oct 2020- Jun 2021	Oct 2020- Sep 2021
(1)	(2)	(3)	(4)	(5)	(6)
World	1,011,650	1,231,419	1,206,555	784,267	1,028,487
Viet Nam	48,998	117,295	137,206	109,671	140,461
United Arab Emirates	35,669	103,984	126,276	78,153	93,907
Bangladesh	59,596	84,666	91,246	61,474	93,115
Turkey	98,352	100,527	78,049	50,719	72,468
Korea	12,456	26,835	56,782	50,248	53,331
Pakistan	68,736	48,432	48,218	33,029	42,515
Others	687,843	749,680	668,778	400,973	532,690

* Chinese export of paperboard includes the product under review and two-sided coated bleached Paperboard/clay coated bleached paperboard

**POI of original investigation

Source: www.trademap.org

25.2 The above table shows that worldwide exports of Paperboard from China have slightly increased by 1.7% percent during the last year of POR as compared to original POI, which indicates that China has not developed any new markets, therefore, there is likelihood that dumped imports of Coated Bleached Paperboard from China would increase if anti-dumping duties are terminated.

25.3 On the basis of above information and analysis the Commission has reached to the conclusion that after imposition of anti-dumping duties on dumped exports of Coated Bleached Paperboard from China, major export markets of China remained same. Therefore, in case anti-dumping duties imposed on the dumped imports of Coated Bleached Paperboard from China are terminated, there is likelihood of its recurrence or continuation of dumping into Pakistan.

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26. Production Capacities, Quantities Produced and Inventories of the Product under Review of Exporters/ Producers after Imposition of Anti-dumping Duties

26.1 The data for international production and demand is not available, however data available on the “Trademap” reveals that collectively the worldwide exports of China increased by 1.7 percent during POR as compared to original POI (reference Table – V supra).

26.2 The exports of Paperboard from China to its major export destinations i.e., Turkey and Pakistan decreased significantly during last three years as compared to POI of original investigation. Exports of Paperboard from China to Turkey decreased from 98,352 MT in Oct 2014-Sep 2015 to 72,468 MT in Oct 2020-Sep 2021. However, exports of Paperboard from China to its other exports destinations i.e., Viet Nam, United Arab Emirates, Bangladesh and Korea increased during POR as compared to POI of original investigation.

26.3 The investigation reveals that there had been some significant regional capacity shifts from other countries to China for Coated Bleached Paperboard manufacturing. Further, the producers of Coated Bleached Paperboard in China are also enhancing their production capacities. Following information will support the said analysis:

- (a) As per news item published on the website of Smithers.com, around 2.5 million tons of capacity has been shifted to China during 2018 to 2020.¹
- (b) The website of Valmet explained that China’s Guangxi Jingui Pulp and Paper mill will add 3800 tons per day capacity. This 3800 tons per day capacity adds around 1.3 million tons of capacity.²
- (c) APP China also has plans to increase its production capacity for virgin fiber Paperboard from 3.9 million MT to 5.7 million as reported by EUWID pulp and paper.³
- (d) In addition, as per website of China Pulp Paper, Vioth, technology supplier, announced to supply three new containerboard Machines to Three Dragons which will add a daily production volume of around 2400 tons (roughly around 900,000 tons per year).
- (e) Vioth has also received order to supply and build new Paperboard machine to Asia Symbol. This new Paperboard machine will add capacity of upto 1 million tons coated folding box Paperboard.⁴

¹[https://www.smithers.com/resources/2021/june/folding-carton-market-set-to-boom-to-\\$172-billion](https://www.smithers.com/resources/2021/june/folding-carton-market-set-to-boom-to-$172-billion) (accessed on February 11, 2022)

²<https://www.valmet.com/media/news/press-releases/2020/valmet-to-supply-the-worlds-fastest-coated-board-making-line-for-apps-guangxi-jingui-pulp-and-paper-in-china/#:~:text=Valmet%20will%20supply%20a%20coated,of%20the%20first%20quarter%202020.>

(accessed on February 11, 2022)

³<https://www.euwid-paper.com/news/singlenews/Artikel/app-china-to-boost-board-capacity-at-its-guangxi-mill.html>

(accessed on February 11, 2022)

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26.4 From the above information and analysis the Commission has reached to the conclusion that the inventories of Coated Bleached Paperboard of China has increased and it has exportable surplus to dump in Pakistan. Therefore, in case anti-dumping duties are terminated, there is likelihood of recurrence or continuation of dumping of the product under review.

27. **Trade Remedial Actions Taken by Other Countries on Exports of Coated Bleached Paperboard of China during Last Five Years**

No country has imposed any trade remedy measures on Coated Bleached Paperboard from China during the POR.

28. **Determination of Likely Recurrence or Continuation of Injury to the Domestic Industry**

28.1 The Applicants are of the view that existing anti-dumping duties imposed on dumped imports of Coated Bleached Paperboard from China have helped the domestic industry to recover from its previously stagnant condition. The Applicants further stated that it is likelihood that dumping of Coated Bleached Paperboard from China will recur in case anti-dumping duties are terminated, which will lead to injury to the domestic industry.

28.2 To determine likely continuation or recurrence of injury to the domestic industry, the Commission considered the following factors:

- (a) Likely change in volume of imports if antidumping duty is terminated;
- (b) Impact of dumped imports on prices of the domestic like product with and without antidumping duty;
- (c) Consequent likely impact of change in dumped imports on domestic producers of the like product, which include likely and potential decline in sales, profits, output, market share, productivity, return on investments, utilization of capacity and likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital or investments; and
- (d) Any other relevant factor.

29. **Likely Effect on Volume of Dumped Imports**

29.1 With regard to the volume of dumped imports, in terms of Section 15(2) of the Act, it is considered whether there would be significant increase in dumped imports, either in absolute terms or relative to the consumption or production of the domestic like product if the anti-dumping duties are terminated.

⁴<https://chinapulppaper.com/news/203-voith-to-supply-asia-symbol-with-one-million-tpy-board-machine-in-china.html> (accessed on February 11, 2022)

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29.2 The following table shows information on imports of the product under review in period of original investigation and period of review:

Table – VI
Volume of Dumped Imports
(MT)

Period	Imports from		
	Dumped Sources	Other Sources	Total Imports
(1)	(2)	(3)	(4)
Oct 2014-Sep 2015*	57,625	231	57,856
Oct 2018-Sep 2019	2,933	11,593	14,526
Oct 2019-Sep 2020	2,406	3,633	6,039
Oct 2020-Sep 2021	1,405	11,770	13,175

* POI of Original Investigation. Source: PRAL

29.3 The above table shows that the share of dumped imports from China during period of original investigation was 99.6 percent of total imports of Coated Bleached Paperboard which after imposition of antidumping duties reduced to 20.1 percent during Oct 2018-Sep 2019. During Oct 2019-Sep 2020, the share of dumped imports from China increased to 39.8 percent. However, during last year of POR, Oct 2020-Sep 2021 the share of dumped imports decreased to 10.6 percent. The dumped imports of product under review decreased from 57,625 MT in original POI to 1,405 MT in the last year of POR.

29.4 The imports from other sources have increased significantly during period of review as compared to the period of investigation. The imports from other sources during the period of original investigation were 0.4 percent of total imports. But after the imposition of anti-dumping duties on dumped imports from China, the imports from other sources increased to 89.3 percent in Oct 2020-Sep 2021. The major imports from other sources include the imports from European Union, Finland, Sweden and United States of America.

29.5 On the basis of above information and analysis, the Commission has concluded that Termination of anti-dumping duties on dumped imports of the product under review would likely lead to increase in its volume. Therefore, termination of anti-dumping duties on dumped imports would likely lead to the recurrence of injury to the domestic industry on account of increase in volume of dumped imports.

30. Likely Price Effects

30.1 Effects of dumped imports on sale price of the domestic like product has been examined to established whether there is likely price undercutting, price depression and price suppression. Likely effects on price of the domestic like product are analyzed in following paragraphs:

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30.2 Likely Effects on Price Undercutting

30.2.1 Information on weighted average ex-factory price of the domestic like product and weighted average landed cost (with and with-out antidumping duty) of the product under review prevailed during the period of original investigation and period of review is given in the table below:

**Table – VII
 Price Undercutting**

Period	Weighted Average ex-factory price of domestic like product	Price undercutting without anti-dumping duty		Price undercutting with anti-dumping duty	
		Weighted Average landed cost of dumped imports**	Percentage	Weighted Average landed cost of dumped imports***	Percentage
(1)	(2)				
Oct 2014-Sep 2015*	100.00	85.20	14.8%	--	--
Oct 2018-Sep 2019	138.49	128.72	7.1%	158.12	--
Oct 2019-Sep 2020	152.38	143.99	5.5%	176.87	--
Oct 2020-Sep 2021	172.59	168.54	2.3%	205.57	--

* Original Investigation period.

** Landed cost = (CD@20%+ACD 7% & 2%+Incidentals@5%)

*** Landed cost = (CD@20%+ ACD 7% & 2% + ADD+Incidentals@5%),

Source: the Applicants, PRAL

Note: In order to maintain confidentiality, actual figures have been indexed w.r.t figure of weighted average price of Oct 2014-Sep 2015 by taking it equal to 100.

30.2.2. The above table shows that without anti-dumping duties the weighted average landed cost of dumped imports of Coated Bleached Paperboard from China was lower than the weighted average ex-factory price of domestic like product during the POR. Whereas, with anti-dumping duties, weighted average landed cost of dumped imports of Bleached Paperboard from China exceed the weighted average ex-factory price of domestic like product during the same period which shows that domestic industry did not suffer price undercutting during POR.

30.2.3 On the basis of above information and analysis the Commission determined that the domestic industry would likely face injury on account of price undercutting if antidumping duties imposed on dumped imports of the product under review from China are terminated.

30.3 Likely Effects on Price Depression

30.3.1 Information on weighted average ex-factory price of the domestic like product during the period of original investigation and period of review is given in the table below:

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Table – VIII
Price Depression

Period	Weighted Average ex-factory price of domestic like product	Price depression (%)
(1)	(2)	(3)
Oct 2014-Sep 2015*	100.00	5.21
Oct 2018-Sep 2019	138.49	--
Oct 2019-Sep 2020	152.38	--
Oct 2020-Sep 2021	172.59	--

* POI of Original Investigation. Source: the domestic industry

Note: In order to maintain confidentiality, actual figures have been indexed w.r.t figure of weighted average price of Oct 2014-Sep 2015 by taking it equal to 100.

30.3.2 As evident from the table above, the domestic industry did not suffer price depression during POR i.e., October 2018 to September 2021 as compared to the period of original investigation i.e., October 2014 to September 2015.

30.3.3 On the basis of the above information and analysis the Commission has concluded that there is likelihood of price depression if antidumping duties imposed on dumped imports of the product under review are terminated.

30.4 Likely Effect on Price Suppression

30.4.1 Information/data on weighted average cost to make and sell and ex-factory price of the domestic like product during the period of original investigation and period of review is given in following table:

Table – IX
Price Suppression

Period	Weighted Average cost to make & sell of domestic like product	Weighted Average ex-factory price of domestic like product	Increase/ (decrease) in cost of production	Increase/ (decrease) in price	Price Suppression
(1)	(2)	(3)	(4)	(5)	(6)
Oct 2014-Sep 2015*	100.00	98.36	--	--	--
Oct 2018-Sep 2019	143.45	136.21	--	--	--
Oct 2019-Sep 2020	136.83	149.88	(6.61)	13.67	--
Oct 2020-Sep 2021	135.27	169.75	(1.56)	19.88	--

* POI of Original Investigation Source: the domestic industry

Note: In order to maintain confidentiality, actual figures have been indexed w.r.t figure of weighted average cost to make & sell of Oct 2014-Sep 2015 by taking it equal to 100.

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30.4.2 The above table shows that the domestic industry did not suffer price suppression during the period of review i.e., October 2018 to September 2021. In case antidumping duties on dumped imports are terminated, dumped sources will resume dumping their product into the domestic market which is likely to cause material injury to the domestic industry on account of price suppression.

30.4.3 On the above information and analysis the Commission has concluded that there is likelihood of injury to the domestic industry on account of price suppression if antidumping duties are terminated on imports of the product under review.

31. Likely Effects in Sales and Market Share

31.1 The sales made by the domestic industry and the market share of domestic industry in the domestic market during the period of original investigation and period of review are given in the table below:

Table – X
Sales and Market Share

Period	Sales by domestic industry	Dumped imports	Imports from other sources	Total market
(1)	(2)	(3)	(4)	(5)
Oct 2014-Sep 2015*	40.61**	59.16	0.24	100.00
Oct 2018-Sep 2019	58.01	3.01	11.90	72.93
Oct 2019-Sep 2020	56.98	2.47	3.73	63.18
Oct 2020-Sep 2021	70.13	1.44	12.08	83.66

* POI of Original Investigation.

** It includes sales of M/s Century Paper & Boards Mills Ltd., and M/s Bulleh Shah Packaging Pvt Ltd.

Source: the domestic industry and PRAL

Note: In order to maintain confidentiality, actual figures have been indexed w.r.t figure of total market of Oct 2014-Sep 2015 by taking it equal to 100.

31.2 The above table reveals that the total market decreased by 16.3 percent during the last year of period of review i.e., in Oct 2020-Sep 2021 as compared to the period of original investigation.

31.3 The share of domestic industry which was 40.6 percent of total market during the period of original investigation increased to 79.06 percent of the total market in first year of period of review i.e. in Oct 2018-Sep 2019. This was due to levy of antidumping duties on dumped imports. The share of domestic industry remained 90.02 percent of total market during Oct 2019-Sep 2020 and 83.80 percent during last year of period of review i.e. in Oct 2020-Sep 2021. The share of dumped imports that constitutes 59.2 percent of the total market in original investigation substantially decreased during the period of review and reduced to 1.7 percent.

31.4 On the basis of the above information and analysis the Commission has concluded that after imposition of anti-dumping duties on dumped imports of the product under review, market

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share of dumped imports and the market share of domestic industry declined. Whereas, market share of imports of Coated Bleached Paperboard from other countries increased sharply. This leads to the conclusion that after imposition of anti-dumping duties on imports of the product under review the dumped imports and the domestic like product became at par, which competed with imports of Coated Bleached Paperboard from other countries.

31.5 Termination of antidumping duties on dumped imports of the product under review would likely lead to increase in its imports, which would be directly competing to domestic like product and would replace some of its market share. It is likely that the dumped imports would regain market share to its original level. Therefore, there is likelihood of injury to the domestic industry on account of market share if anti-dumping duties are terminated on dumped imports of the product under review.

32. **Likely Effects on Capacity Utilization**

32.1 The following table shows capacity utilization of the domestic industry during the period of original investigation and period of review:

Table – XI
Capacity Utilization

Period	Capacity Utilization
(1)	(2)
Oct 2014-Sep 2015*	65.61%
Oct 2018-Sep 2019	79.15%
Oct 2019-Sep 2020	77.22%
Oct 2020-Sep 2021	83.75%

* POI of Original Investigation.

* The figures indicated in Oct 2014 – Sep 2015 only relates to M/s Century Paper and Board Mills Limited since it was sole applicant in the original investigation

Source: the Applicants

32.2 Installed capacity of the domestic industry increased from 30,000 MT during POI of original investigation to 78,500 MT during last year of POR i.e., October 2020- September 2021. During same period, capacity utilization increased from 65.61% to 83.75%.

32.3 On the basis of the above information and analysis it is concluded that the domestic industry would likely face injury on account of production and capacity utilization on termination of anti-dumping duties imposed on dumped imports of the product under review from China.

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33. **Likely Effects on Sales**

33.1 After imposition of anti-dumping duties on Coated Bleached Paperboard, sales of the domestic like product have increased. The following table shows sales of the domestic like product during the period of original investigation and during period of review:

Table – XII
Sales of Domestic like Product

Period	Sales by Domestic Industry
(1)	(2)
Oct 2014-Sep 2015*	100.00 **
Oct 2018-Sep 2019	279.78
Oct 2019-Sep 2020	274.78
Oct 2020-Sep 2021	338.21

* POI of Original Investigation. Source: the Applicants

** The figures indicated in Oct 2014 – Sep 2015 only relates to M/s Century Paper and Board Mills Limited since it was sole applicant in the original investigation

Note: In order to maintain confidentiality, actual figures have been indexed w.r.t figure of sales of Oct 2014-Sep 2015 by taking it equal to 100.

33.2 The above table shows that the sales of the domestic industry have increased from *** MT in POI of original investigation to *** MT during last year of POR. However, year on year basis, the sales of the domestic industry slightly decreased to *** MT during second year of POR i.e., October 2019 to September 2020 as compared to proceeding year. During last year of POR i.e., October 2020 to September 2021 the sales of the domestic industry increased to *** MT as compared to sales of *** MT in previous year.

33.3 On the basis of the above information and analysis it is concluded that the domestic industry would likely face injury on account of sales on termination of anti-dumping duties imposed on dumped imports of the product under review from China.

34. **Likely Effects on Profits**

34.1 Net profit of the domestic industry during the period of original investigation and period of review is given in the following table:

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Table – XIII
Profit/Loss

Period	Net Profit
(1)	(2)
Oct 2014-Sep 2015*	(100)
Oct 2018-Sep 2019	(1,238)
Oct 2019-Sep 2020	2,170
Oct 2020-Sep 2021	7,057

* POI of Original Investigation.

**The figures indicated in Oct 2014 – Sep 2015 only relates to M/s Century Paper and Board Mills Limited since it was sole applicant in the original investigation.

Source: Applicants

Note: In order to maintain confidentiality, actual figures have been indexed w.r.t figure of net profit of Oct 2014-Sep 2015 by taking it equal to 100.

34.2 Above table shows that the domestic industry suffered a loss of Rs. *** million during POI of original investigation i.e., October 2014 to September 2015. However, after imposition of anti-dumping duties, the domestic industry became profitable during POR and earned profits of Rs. *** million during last year of POR i.e., October 2020- September 2021.

34.3 On the basis of the above information and analysis it can be concluded that the domestic industry would likely face injury on account of decline in profits and/or profitability on termination of anti-dumping duties imposed on dumped imports of the product under review from China.

35. **Likely Effects on Inventories**

35.1 Inventory position of the domestic like product during the period of original investigation and period of review is given in the following table:

Table – XIV
Opening and Closing Inventory

Period	Opening Inventory	Closing Inventory
(1)	(2)	(3)
Oct 2014-Sep 2015*	100.00**	62.24**
Oct 2018-Sep 2019	396.04	316.13
Oct 2019-Sep 2020	316.13	330.43
Oct 2020-Sep 2021	330.43	142.01

* POI of Original Investigation. Source: the Applicants

**The figures indicated in Oct 2014 – Sep 2015 only relates to M/s Century Paper and Board Mills Limited since it was sole applicant in the original investigation.

Note: In order to maintain confidentiality, actual figures have been indexed w.r.t figure of opening inventory of Oct 2014-Sep 2015 by taking it equal to 100.

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35.2 The above table shows that closing inventory in the POI for original investigation was *** MT which increased to *** MT during first year of POR i.e., October 2018-September 2019. During second year of POR i.e., October 2019-September 2020 closing inventories further increased to *** MT, however, during last year of POR i.e., October 2020-September 2021, closing inventories declined to *** MT.

35.3 Termination of anti-dumping duties on dumped imports from China would lead likely increase in volume of dumped imports of the product under review, which would negatively affect production and sales of the domestic like product, therefore, termination of anti-dumping duties on dumped imports of the product under review would negatively affect inventories of the domestic like product of the domestic industry.

35.4 On the basis of the above information and analysis it can be said that the domestic industry would likely face injury on account of increase in inventories of the domestic like product if anti-dumping duties imposed on dumped imports of the product under review are terminated.

36. Likely Effect on Employment, Productivity and Wages

36.1 The data on employment in the domestic industry, productivity and the wages paid during the period of original investigation and period of review is given in following table:

Table – XV
Employment, Productivity and Wages

Period	Number of Employees	Salaries and wages	Domestic production	Productivity per worker	Salaries & wages Rs. per
(1)	(2)	(3)	(4)	(5)	(6)
Oct 2014-Sep 2015*	100.00	100.00	100.00	100.00	100.00
Oct 2018-Sep 2019	1,054	248.78	281.49	26.55	88.36
Oct 2019-Sep 2020	985	287.11	282.96	28.73	101.52
Oct 2020-Sep 2021	1,100	331.71	334.01	30.32	99.34

* POI of Original Investigation.

Source: Applicants

** The figures indicated in Oct 2014 – Sep 2015 only relates direct production employees of M/s Century Paper and Board Mills Limited since it was sole applicant in the original investigation.

Note: Figure of POR includes direct production employees as well as proportionate share of employees of the auxiliary departments.

Note: In order to maintain confidentiality, actual figures have been indexed w.r.t figure of Oct 2014-Sep 2015 of each respective column by taking it equal to 100.

36.2 The above table shows that after imposition of anti-dumping duties, number of employees increased and productivity per worker improved during POR i.e., October 2018 to September 2021 as compared to POI of original investigation i.e., October 2014 to September 2015. However, likely recurrence of dumping of the product under review would adversely effect employment and productivity of the domestic industry. Termination of anti-dumping duties on

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dumped imports from China would lead likely increase in volume of dumped imports of the product under review, which would negatively affect production of the domestic like product, which would negatively affect productivity of the domestic like product of the domestic industry.

36.3 On the basis of the above information and analysis the Commission has reached on the conclusion that the domestic industry would likely face injury on account of decrease in productivity if anti-dumping duties imposed on dumped imports of the product under review are terminated.

37. **Likely Effect on Investment and Return on Investment**

37.1 M/s. Century Paper & Board Mills Ltd. and M/s Bulleh Shah Packaging (Pvt.) Ltd are multi-product companies. Therefore, investment and return on investment of M/s. Century Paper & Board Mills Ltd. and M/s Bulleh Shah Packaging (Pvt.) Ltd for whole company is determined as profit before the tax divided by total assets minus current liabilities and is given in the table below for the period of original investigation and period of review are given below.

Table – XVI
Return on Investment

Period	Return on Investment
(1)	(4)
Oct 2014-Sep 2015*	2.06% **
Oct 2018-Sep 2019	5.14%
Oct 2019-Sep 2020	20.36%
Oct 2020-Sep 2021	23.92%

* POI of Original Investigation.

** The figures indicated in Oct 14 – Sep 15 only relates to M/s Century Paper and Board Mills Limited since it was sole applicant in the original investigation

Source: the Applicants

37.2 The above table shows that return on investment improved after imposition of anti-dumping duties on dumped imports of the product under review.

37.3 Termination of anti-dumping duties on dumped imports from China would lead likely increase in volume of dumped imports of the product under review, which would negatively affect production, sales, profits and investment of the domestic industry, therefore, termination of anti-dumping duties on dumped imports of the product under review would negatively affect return on investment of the domestic industry.

37.4 On the basis of the above information and analysis it is concluded that the domestic industry may face injury on account of return on investment on termination of anti-dumping duties imposed on dumped imports of the product under review from China.

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38. **Likely Effects on Cash Flow**

38.1 Following table shows net cash flow position of the domestic industry during the period of original investigation and period of review:

Table – XVII
Cash Flow

Period	Net cash inflow/ (outflow) from operations
(1)	(2)
Oct 2014-Sep 2015*	100.00**
Oct 2018-Sep 2019	219.85
Oct 2019-Sep 2020	416.35
Oct 2020-Sep 2021	412.08

* POI of Original Investigation. Source: Applicants

** The figures indicated in Oct 14 – Sep 15 only relates to M/s Century Paper and Board Mills Limited since it was sole applicant in the original investigation

Note: In order to maintain confidentiality, actual figures have been indexed w.r.t figure of net cash inflow/(outflow) from operations of Oct 2014-Sep 2015 by taking it equal to 100.

38.2 After the imposition of anti-dumping duties, dumped imports from China declined. The domestic industry was thus able to generate sufficient cash flows during the period of review. Termination of anti-dumping duties on dumped imports from China would lead likely increase in volume of dumped imports of the product under review, which would negatively affect production and sales of the domestic like product, therefore, termination of anti-dumping duties on dumped imports of the product under review would negatively affect cash flows of the domestic industry.

38.3 On the basis of the above information and analysis it can be said that the domestic industry would likely face injury on account of decline in cash flows on termination of anti-dumping duties imposed on dumped imports of the product under review from China.

39. **Likely Effects on Growth and Investment**

39.1 The domestic industry is of view that if anti-dumping duties expires on Coated Bleached Paperboard imported from China, it may have negative effect on investment and future growth of the domestic industry producing Coated Bleached Paperboard.

39.2 It is concluded that there is likelihood to suffer injury on account of growth and investment for the domestic industry if anti-dumping duties are terminated on dumped imports of the product under review.

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40. **Summing up Likely Recurrence or Continuation of Injury**

On the basis of information and analysis at paragraphs above the Commission has reached on conclusion that termination of anti-dumping duties imposed on dumped imports of the product under review from China would lead to likely recurrence of injury to the domestic industry on account of the following:

- (a) Likely increased volume of dumped imports of the product under review from China;
- (b) Likely price undercutting, price depression and price suppression;
- (c) Likely decline in production, capacity utilization, sales and market share of the domestic like product; and
- (d) Likely negative effect on profits, cash flows, returns on investment, inventories, growth and investment and productivity of the domestic industry..

D. **CONCLUSIONS**

41. After taking into account all information, data and analysis the Commission has reached on the following conclusions:

- (a) The Applicants filed an application for sunset review within prescribed time-period in accordance with Section 58(3) of the Act. The application was filed by the Applicants representing 100 percent of the domestic production of domestic like product during the period of review;
- (b) The product under review and the domestic like product are like products;
- (c) There is likelihood of continuation and/or recurrence of dumping of the product under review from China if anti-dumping duties imposed on dumped imports of the product under review are terminated because:
 - (i) After imposition of antidumping duties on dumped imports of the product under review the exporters of China reduced significantly their exports of the product under review to Pakistan;
 - (ii) After imposition of anti-dumping duties on dumped imports its share in total imports declined significantly;
 - (iii) Exporters of China continued dumping of the product under review after imposition of antidumping duties; and
 - (iv) Major export destinations of Coated Bleached Paperboard from China remained almost same after imposition of antidumping duties by Pakistan on dumped imports of the product under review; and

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42. If anti-dumping duties imposed on dumped imports of the product under review is terminated the domestic industry would likely suffer injury on account of the following:

- (a) increased volume of dumped imports of the product under review;
- (b) price undercutting, price depression and price suppression;
- (c) decline in production, capacity utilization, sales and market share; and
- (d) negative effect on profits/profitability, cash flows, return on investment and productivity of the domestic industry

E. **CONTINUATION OF DEFINITIVE ANTI-DUMPING DUTIES**

43. In terms of Section 58(3) of the Act, definitive anti-dumping duty shall not expire if the Commission determines in the review that the expiry of such anti-dumping duty would be likely to lead continuation or recurrence of dumping and injury.

44. In view of the information, analysis and conclusions in preceding paragraphs, the Commission has determined that the expiry of anti-dumping duty imposed on dumped imports of the product under review would be likely to lead continuation and recurrence of its dumping and the domestic industry would likely suffer injury due to likely continuation of dumped imports of the product under review. The Commission has, therefore, decided to continue anti-dumping duties as per following rates for further five years effective from February 28, 2022.

Table – XX
Definitive Anti-Dumping Duty Rates

Exporter/Foreign Producer from China	Antidumping Duty Rates (%)
(1)	(2)
Ningbo Asia Pulp & Paper Co Ltd.	28.74
Ningbo Zhonghua Paper Co., Ltd	
Guangxi Jingui Pulp & Paper Co Ltd	
Gold East (Hong Kong) Trading Co., Ltd	
All others	29.02

45. In accordance with Section 51 of the Act, the antidumping duty shall take the form of *ad valorem* duty and be held in a non-lapsable personal ledger account established and maintained by the Commission for the purpose. Release of the dumped imports of the product under review for free circulation in Pakistan shall be subject to imposition of such anti-dumping duty.

46. Further, in accordance with Section 51(1)(e) of the Act, definitive antidumping duty will not be levied on imports of the product under review that are to be used as inputs in products

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destined solely for exports and are covered under any scheme exempting customs duty for exports under the Customs Act 1969.

47. Definitive anti-dumping duty levied would be in addition to other taxes and duties leviable on import of the product under review under any other law.

48. The definitive anti-dumping duty would be collected in the same manner as customs duty is collected under the Customs Act, 1969 (IV of 1969) and would be deposited in Commission's Non-lapsable PLD account No. 187 with Federal Treasury Office, Islamabad.

(Muhammad Saleem)
Member
August 24, 2022

(Anjum Assad Amin)
Member
August 24, 2022

(Robina Ather)
Chairperson
August 24, 2022

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Annex - I

Comments from interested parties	NTC view
View/comments of Mr. Junaid (JA LEGAL)	
<p>"As per the RISI (Fastmarkets) data specifically on 'One-Side Coated Bleach Board/Folding Box Paperboard' (Investigated Product) there was no dumping during the period of investigation (POI) ..., because the normal price in China were in fact lower and the export prices in Pakistan was higher. The normal value was calculated wrongly in violation of mandatory provisions of Anti-Dumping Duties Act, 2015. ...</p> <p>The reliability of the RISI (Fastmarkets) data can be gauged from the perspective that this Publication Data i.e. RISI (Fastmarkets), was also relied by the domestic industry themselves both in their (i) original application, and even in (ii) Sunset Review Application. However, the domestic industry manipulated the data as they may asked RISI (Fastmarkets) for various types of papers which are imported under the same HS code 4819.9200.</p> <p>The importers [through M/s. Khairullah Paper and Board Works Pvt. Ltd] also provided the RISI (Fastmarkets) data to NTC via email on 23.06.2017 specifically on 'One-Side Coated Bleach Board/Folding Box Paperboard' before Final Determination Report. However, the RISI (Fastmarket) data was ignored by the NTC on the ground that since primary data is available hence the same cannot be considered. On the contrary, the primary data i.e. prices of the exporters, according to NTC's own Final Determination Report at Pg.21 Para 31, was not reliable and not in accordance with the accounting standards hence NTC instead used the best information available as per Section 32 of Anti-Dumping Duties Act, 2015..... The Appeal against the Final Determination Report is also pending and this important legal and factual issue is sub-juice before the Anti-Dumping Appellate Tribunal (Islamabad) in Appeal No. 277/2018".</p>	<p>The issue is related to the original investigation in which exporters/producers have cooperated with NTC. NTC used data available with it to calculate dumping margin. The matter is sub-juice in the Anti-Dumping Appellate Tribunal which has not passed any order on this issue.</p>
<p>“Nonetheless, considering the circumstances and in light of the Sunset Review, the importers again specifically requested RISI (Fastmarkets) in May 2022 to provide the data for the period of Review i.e. 1 Oct 2018 to Sep 2021 in relation to 'One-Side Coated Bleach Board/Folding Box Paperboard' and once the RISI (Fastmarkets) data is received, the importers/interested parties will share the same with NTC in Sunset-Review proceeding along with their written arguments in order to effectively assist the NTC, and further to substantiate that Domestic Industry is manipulating the Chinese/exporter prices at the detriment of the Pakistani economy and only to serve their own vested and financial interests”.</p>	<p>No data of RISI has been provided to NTC by the importers. The investigations/reviews are time bounded and unlimited period to submit data/information could not be provided.</p>

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Coated Bleached Paperboard Originating in and/or Exported from China into Pakistan

Comments from interested parties	NTC view
<p>“It is important to verify the data submitted by the Domestic Industry specifically in relation to One-Side Coated Bleach Board/Folding Box Paperboard’ (Investigated Product) directly from RISI (Fastmarkets) in order to protect the interest of all interested parties and to make the investigation as transparent as possible”.</p>	<p>The team of the Commission conducted on-the-spot verifications at the offices and plants of the M/s. Century Paper & Board Mills Ltd from May 19-20, 2022 and M/s Bulleh Shah Packaging (Pvt) Ltd from June 20-21, 2022. Reports of the on-the-spot verifications are made available to the interested parties by placing them in the public file. The Commission verified the production and sales of One sided Bleached Paperboard and found in order with the data submitted in the application.</p>
<p>“...M/s Century Paper and Board Mills Limited (‘Domestic Producer’) who purportedly holds 53.3% of the total domestic market share in the capacity of a domestic producer of the Investigated Products, only use to produce variants of the Investigated Products ranging from 190 GSM to 350 GSM, whilst M/s Bulleh Shah who now purportedly holds 46.6% of the total domestic market share in the capacity of a domestic producer of the Investigated Products used to produce only three variants of the investigated products i.e. 208GSM, 240 GSM and 270 GSM. The NTC in its original investigation failed to exclude the remaining variants....”</p> <p>“Therefore, the following variants shall also be excluded from the scope of the investigated Products (i) FSCMIX/FSC 100% Certified Folding Box Board White Back used for export orders; (ii) One side Coated High Bulk Ivory Board used for high-end packaging; (iii) One Side Coated Hard sized Folding Box Board used for frozen packaging, which requires moisture protection; (iv) One Side Coated Folding Box Board Grease/Oil Resistant for packaging of food and nonfood item which are oily in nature; and (v) investigated product of 180,360,370,380,390 and 400 GSM”.</p>	<p>The product under review is Coated Bleached Paperboard/ One Side Coated Folding Box Paperboard with White Back Manila pulp or ISC Ivory Paperboard with White Back Manila Pulp (180gsm-400gsm) Pakistan excluding One Sided Aseptic Coated Paperboard (Clay Coated) and Two-Sided Coated Bleached Paperboard (classified under PCT Headings Nos. 4810.9200 & 4810.9900) exported by the exporters / producers from China. Please refer para 14 and para 15 of this review for details.</p> <p>In accordance with Section 51(1)(e) of the Act, definitive antidumping duty will not be levied on imports of the product under review that are to be used as inputs in products destined solely for exports and are covered under any scheme exempting customs duty for exports under the Customs Act 1969.</p>
<p>View/comments of Barister Saad Wyne, representative of M/s Salman Paper Products Pvt. Ltd. and M/s Madiha International Pvt. Ltd.</p>	
<p>Currently, imports of bleached board are decreasing which cannot cause injury to the domestic industry.</p> <p>Due to current economic condition in Pakistan and all over world, prices of imported products have increased significantly, therefore, imposition of anti-dumping duties on imported bleached board is not needed. The Commission is requested to take into account prices factor while concluding the sunset review.</p> <p>At original investigation, numerous points were raised which were not considered while concluding the investigation. Therefore, the Commission is requested to re-consider the same in sunset review.</p> <p>Request to review the current anti-dumping duties applicable and consider other factors to promote downstream industry.</p>	<p>The scope of this review was to ascertain whether there is likelihood of continuation or recurrence of dumping of the product under review from China and material injury to the domestic industry.</p> <p>The Commission considered the submissions submitted by the interested parties in the original investigation and passed/issued its order/final determination. The same is sub-judice in the Anti-Dumping Appellate Tribunal which has not passed any order.</p>