

**A.D.C. No. 35/2025/NTC/CRC/CV**  
**Government of Pakistan**  
**National Tariff Commission**  
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**Notice of Initiation of Investigation Against Alleged Circumvention of Anti-Dumping Duties Imposed on Dumped Imports of Cold Rolled Coils/Sheets Originating in and/or Exported from the People's Republic of China.**

The National Tariff Commission (the "Commission") imposed the definitive anti-dumping duties in *ad valorem* terms ranging from 13.17 percent to 19.04 percent on dumped imports of Cold Rolled Coils/Sheets of iron or non-alloy steel ("CR Coils/sheets") importable from China for a period of five years effective from January 13, 2016, which were extended by way of a Sunset Review, for another period of five years with effect from January 13, 2021. During the said Sunset Review the Commission slightly amended the scope of CR Coils/Sheets subject to the anti-dumping duties by capping its width up to 1250 mm.

The Commission has received an application under Section 63 of the Anti-Dumping Duties Act, 2015, (the "Act") read with Rules 23 and 25 of the Anti-Dumping Duties Rules, 2022 (the "Rules") on March 27, 2025 from M/s. International Steels Limited, Karachi and M/s Aisha Steel Mills Limited, Karachi (the "Applicants"), who are manufacturers of CR Coils/sheets in Pakistan. The Applicants have alleged that Chinese exporters and producers are circumventing the anti-dumping duties through product modification, which is undermining the remedial effects of the anti-dumping duties imposed on dumped imports of CR Coils/sheets China in terms of quantities and prices of the domestic like product. Therefore, the domestic industry is not realizing the benefits of imposition of anti-dumping duties and is suffering injury.

**Product under Investigation or Slightly Modified Product:**

As per the submission of the Applicants, the product under investigation for the purposes of this anti-circumvention investigation is flat-rolled products of iron or non-alloy steel of a thickness ranging from 0.15 mm to 3.00 mm and a width above 1250mm, cold rolled (cold- reduced), not clad, plated or coated, of prime and secondary quality ("CR Coils/Sheets"), of in rolls or slit to length sheets, excluding CR Coils/ Sheets used in automotive outer skins of four wheeler vehicles and following auto grades and TMBP imported from China.

**S.No Grade**

- i. JAC, JSC & SPC, JEH - 270, 34OPN, 44OWN, 59ORN, SCGA 270-45, SCGA590DU-45
- ii. SPCD-S, SECC-0/20, SPCC Deep Drawing Quality, SPCEN, SEHC-0/20,
- iii. JSC26OGN-2 (SPCX), JAH59ORN 45/45
- iv. SPC, SPFC, SPH & SPRC - 440, SCGA 440-45, SHGA 440-45 V, SCGA 340
- v. SUS 304, SUS 409LT-E/ SUH 409L/HFS 409L, SUS 429M, SUS 432T / SUS 436J1L, SUS 436L/ SUS 436MT, SUS 439MT
- vi. HFS 429M, HFS 436L, HSS 441
- vii. SA1C-80, SA1D-80 -CZ/ SA1D 40/40 CZ, SACE-120, SA1E-80
- viii. MSM-CC-DZC-90/90
- ix. SAE1050, SAE1070, SAE1078, JS-SK60, JS-SK85
- x. Tin Mill Black Plate (TMBP) of a thickness 0.30 mm or less, PCT Code No. 7209.1891



The product under investigation for circumvention is classified under PCT Headings Nos. Nos. 7209.1510, 7209.1590, 7209.1610, 7209.1690, 7209.1710, 7209.1790, 7209.1810, 7209.1899, 7209.2510, 7209.2590, 7209.2610, 7209.2690, 7209.2710, 7209.2790, 7209.2810 and 7209.2890. The product under investigation is mainly used in production of automotive parts, sub-assembly/inner body parts, fabrication of goods like doors/cabinets, pipes, tubes, refrigerators, washing machines, geysers, ovens etc.

### **Period of Investigation:**

The period of investigation for this anti-circumvention investigation is from January 01, 2021 to December 31, 2024 to determine whether circumvention has undermined the remedial effects of the anti-dumping duties.

### **Initiation of Investigation:**

The Commission is of the view that there is sufficient evidence which indicates that the Chinese exporters/producers are *prima facie*, circumventing anti-dumping duties imposed on dumped imports of CR Coils/sheets through slight modification of the product i.e. CR Coils/Sheets beyond 1250 mm width being imported in place of CR Coils/Sheets of width up to 1250mm from China. Slight modification of the product under investigation (CR Coils/Sheets of width above 1250mm) *prima facie*, has not altered its essential characteristics and it is used for the same purposes as of the product subject to anti-dumping duties i.e. CR Coils/Sheets of width up to 1250mm. Therefore, the Commission has decided to initiate an anti-circumvention investigation under Section 63(4) of the Act and Rule 26 of the Rules to determine whether circumvention of anti-dumping duties is taking place through slight modification of the product, and whether remedial effects of the anti-dumping duty to the domestic industry are being undermined in terms of Section 63 of the Act read with Rules 29 and 30 of the Rules.

### **Schedule for the Investigation:**

Date of initiation of the anti-circumvention investigation:

The date of publication of this notice in the newspapers in Pakistan.

Duration of investigation:

Within nine months from the date of publication of notice of initiation of the anti-circumvention investigation.

### **Interested Parties:**

Interested parties, as defined in Section 2(j) of the Act, are requested to identify themselves to the Secretary, National Tariff Commission, State Life Building No. 5, Blue Area, Islamabad, Tel: +9251-9202839 Fax: +9251-9221205, Email: khizar.ntc@gmail.com, not later than 15 days after publication of this notice. An interested party applying for registration with the Commission in this anti-circumvention investigation should submit the name of the company, its line of business, name of authorized person, address, telephone number, email, fax number etc.

All interested parties are invited to make their views/comments known to the Commission, and to submit information and documents (if any) not later than 60 days of the date of publication of



this notice in the newspapers in Pakistan. All written submissions provided by interested parties on a confidential basis must be marked as “Confidential” and in accordance with Section 31 of the Act and shall be accompanied by a non-confidential version or summary of data/information submitted on confidential basis, which will be placed in the public file. All data and information in this regard should be submitted to the Director (Investigation-II/A), National Tariff Commission, State Life Building No.5, Blue Area, Islamabad. Tel: +92 51 9204118, Fax: +92 51 9221205. Email: [aamir.ntcpk@gmail.com](mailto:aamir.ntcpk@gmail.com)

**Hearing:**

Any party defined as interested party in Section 2(j) of the Act may, if so wishes, shall send a written request for a hearing in accordance with Rule 14 of the Rules within 30 days of the publication of this notice to the Secretary to the Commission.

**Public File:**

In accordance with Rule 7 of the Rules, the Commission has established and shall maintain a public file at its office, which shall be available to interested parties for review and copying from Monday to Thursday between 1100 hours to 1300 hours (except public holidays) throughout this investigation.

**Further Information:**

For further information please contact, Mr. Aamir Shahzad Director (Inv-II), Tel: +92-51-9204118, Fax: +92-51-9221205, Email: [aamir.ntcpk@gmail.com](mailto:aamir.ntcpk@gmail.com). General information may also be obtained by visiting the Commission’s official website [www.ntc.gov.pk](http://www.ntc.gov.pk).

By order of the Commission.

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(Khizar Hayat)  
**Secretary, NTC**  
May 23, 2025