



**Government of Pakistan
National Tariff Commission**

Report

On

Conclusion of Sunset Review of Anti-Dumping Duties Imposed on Dumped Imports of Sulphonic Acid imported from People's Republic of China, the Republic of India, the Republic of Indonesia, Islamic Republic of Iran, the Republic of Korea and Chinese Taipei.

A.D.C No. 49/2016/NTC/SA/SSR/2025

January 16, 2026

A. INTRODUCTION

The National Tariff Commission (the “Commission”) having regard to the Anti-Dumping Duties Act, 2015 (the “Act”) and the Anti-Dumping Duties Rules, 2022 (the “Rules”) and Agreement on Implementation of Article VI of the General Agreement on Tariffs and Trade 1994 (the “Agreement on Anti-dumping”), 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. Section 58 of the Act relates to review of anti-dumping duties imposed on dumped imports of the Sulphonic Acid.

2. Having regard to 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 an anti-dumping duty would be likely to lead to continuation or recurrence of dumping and injury.

3. The Commission has conducted a sunset review of anti-dumping duty imposed on dumped imports of Linear Alkyl Benzene Sulphonic Acid (“Sulphonic Acid”) into Pakistan originating in and/or exported from the People’s Republic of China, the Republic of India, the Republic of Indonesia, Islamic Republic of Iran, the Republic of Korea and Chinese Taipei (the “Exporting Countries”) 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, Rule 44 of the Rules and Article 12.2 of the Agreement on Anti-dumping.

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 of its initiation. The sunset review was initiated on May 23, 2025.

B. BACKGROUND**5. Anti-dumping Duties in Place**

5.1 The Commission imposed definitive anti-dumping duties ranging from 10.09 percent to 21.59 percent in *ad valorem* terms on dumped imports of Sulphonic Acid importable from the Exporting Countries. These duties were imposed for a period of five years, effective from May 25, 2017.

5.2 In terms of Section 58 of the Act, before the expiry of the above-mentioned definitive anti-dumping duties, the Commission conducted a sunset review on the request of domestic industry of Sulphonic Acid. While concluding the said sunset review, the Commission decided to continue definitive anti-dumping imposed on dumped imports of Sulphonic Acid from the Exporting Countries for another period of 3 years with effect from May 25, 2022, as per the rates given in Table-I:

Table-I
Anti-dumping Duty Rates

Country	Exporter / Producer Name	Anti-dumping Duty Rate (%)
(1)	(2)	(3)
China	Jintung Petrochemical Corp. Ltd., China	10.57
	All others from China	10.57
Chinese Taipei	All exporters from Chinese Taipei	13.40
India	All exporters from India	11.25
Indonesia	All exporters from Indonesia	10.09
Iran	All exporters from Iran	20.24
Korea	All exporters from South Korea	21.59

C. PROCEDURE

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

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

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. Further, the anti-dumping duty shall remain in force pending the outcome of such a review. The Commission published a notice of impeding expiry of the anti-dumping duty in this case in the official Gazette and national press in accordance with Section 58 (2) of the Act on February 21, 2025.

8. Receipt of Application

The Commission received an application on April 04, 2025, under Section 58 of the Act for review of the anti-dumping duty imposed on dumped imports of Sulphonic Acid from the Exporting Countries. The application was filed by M/s Tufail Chemical Industries Limited, Karachi and M/s Ittehad Chemical Limited, Lahore (the “Applicants”), who are domestic producers of Sulphonic Acid. The application was in response to the notice of impending expiry of the anti-dumping duty imposed on dumped imports of Sulphonic Acid into Pakistan originating in and /or exported from the Exporting Countries. The Applicants contended that expiry of anti-dumping duty on Sulphonic Acid would be likely to lead to continuation or recurrence of dumping of Sulphonic Acid from the Exporting Countries and material injury to the domestic industry producing Sulphonic Acid.

9. Evaluation and Examination of the Application

Examination of the application showed that it met the requirements of Section 58(3) of the Act and Rule 32 of the Rules as it contained sufficient evidence of likelihood of continuation or

recurrence of dumping of Sulphonic Acid from the Exporting Countries and injury to the domestic industry.

10. Domestic Industry

10.1 As per available information to the Commission, the domestic industry consists of following eight (08) units.

- i. M/s Tufail Chemical Industries Limited, Karachi;
- ii. M/s Ittehad Chemicals Limited, Lahore
- iii. M/s Tufail Multichem Industries (Pvt.) Limited, Karachi;
- iv. M/s Chaudhry Shafique Manufacturing Pvt. Ltd.
- v. M/s Colgate-Palmolive Limited, Karachi
- vi. M/s Faras Combine Marketing Company (Pvt.) Ltd.
- vii. M/s Akbari Chemical Industries (Pvt.) Ltd.
- viii. M/s Daily Chemical

10.2 The units at Serial No. i. and iii. were sister concerns till June 30, 2023. Further, M/s Colgate-Palmolive's entire production is used internally for production of detergent powders.

10.3 Following table shows unit-wise installed production capacities of the eight units comprising domestic industry:

Table-II
Domestic Industry

S. No.	Unit Name	Installed Capacity (MT)
(1)	(2)	(3)
i.	M/s Tufail Chemical Industries Ltd.	47,530
ii	M/s Ittehad Chemicals Ltd,	70,000
iii.	M/s Tufail Multichem industries (Pvt.) Ltd.	50,000
iv.	M/s Chaudhry Shafique Manufacturing Pvt. Ltd.	21,024
v.	M/s Colgate Palmolive Ltd.	30,000
vi.	M/s Faras Combine Marketing Company (Pvt.) Ltd.	23,000
vii.	M/s Akbari Chemical Industries (Pvt.) Ltd.	18,000
viii.	M/s Daily Chemical	25,000
	Total	284,554

Source: the Applicants

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 or review 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 is filed by the Applicants, who are the major producers of Sulphonic Acid in Pakistan. The other units i.e. M/s Tufail Multichem Industries Ltd. and M/s Chaudhry Shafique Manufacturing are supporting the Application, while M/s Colgate Palmolive, M/s Faras Combine Marketing Company (Pvt.) Ltd., M/s Akbari Chemical Industries (Pvt.) Ltd. are indifferent. According to the information provided in the application and available with the Commission, the Applicants produced **38.71** percent of Sulphonic Acid of the total domestic production during January 01, to December 31, 2024, and it is supported by two other domestic producers whose production share was **29.65** percent of total domestic production. Therefore, collectively the application is supported by those domestic producers whose production constitutes about **68.37** percent of the total domestic production. Thus, the application fulfills standing requirements of Section 24 of the Act. The following table shows the production share of each unit of the industry:

Table-III
Standing of Application

S. No	Unit Name	% share in production	Status
(1)	(2)	(4)	(5)
i.	Tufail Chemical Industries Ltd.	22.79	Applicant
ii.	Ittehad Chemicals Ltd,	15.92	Applicant
iii.	Tufail Multichem industries (Pvt.) Ltd.	16.19	Supporting
iv.	Chaudhry Shafique Manufacturing Pvt. Ltd.	13.46	Supporting
v.	Colgate Palmolive Ltd.	9.89	Indifferent
vi.	Faras Combine Marketing Company (Pvt.) Ltd.	7.58	Indifferent
vii.	Akbari Chemical Industries (Pvt.) Ltd.	5.93	Indifferent
viii.	Daily Chemical	8.24	Indifferent
Total		100	

Source: the Applicants

* Colgate-Palmolive's, Faras Combine Marketing's Akbari Chemical's and Daily Chemical's production is assumed/worked out on the basis of capacity utilization by the Applicants in 2024.

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 requirements of Section 24 of the Act.

12. Initiation of Sunset Review

12.1 Upon examination of the application, the Commission established that it met the requirements of Section 58 of the Act and Rule 32 of the Rules. Therefore, the Commission initiated sunset review on May 23, 2025, to determine whether there is likelihood of continuation or recurrence of dumping of Sulphonic Acid from the Exporting Countries and injury to the domestic industry.

12.2 In terms of Section 27 of the Act, the Commission issued a notice of initiation of the sunset review of anti-dumping duty imposed on dumped imports of Sulphonic Acid from the Exporting Countries, which was published in the official Gazette of Pakistan and in two widely circulated national newspapers (“The Nation” and “Daily Duneya”) on May 23, 2025.

12.3 The Commission notified the diplomatic missions of the Exporting Countries in Islamabad on May 23, 2025, of the initiation of the sunset review by sending a copy of the notice of initiation with a request to forward it to all exporters/ producers involved in production, sales and export of Sulphonic Acid in the Exporting Countries. Copies of notice of initiation were also sent to the Applicant, known exporters/producers of Sulphonic Acid in the Exporting Countries (whose addresses were available with the Commission), known importers on May 23, 2025, in accordance with the requirements of Section 27 of the Act.

12.4 In accordance with Section 28 of the Act, on May 23, 2025, the Commission also sent copy of full text of the written application (non-confidential version) to all known exporters/producers of Sulphonic Acid in the Exporting Countries, whose addresses were available with the Commission and to the Diplomatic Missions of the Exporting Countries in Islamabad with a request to forward it to all exporters /producers of Sulphonic Acid involved in production, sale and/or export of Sulphonic Acid.

13. Product Under Review

13.1 The product for which this review is carried out is Linear Alkyl Benzene Sulphonic Acid (“Sulphonic Acid”) originating in and/or exported from the Exporting Countries. The major raw materials used in production of Sulphonic Acid are Linear Alkyl Benzene, Sulphur and Caustic Soda. The product under review is classified under Pakistan Customs Tariff (“PCT”) No. 3402.3100. Major use of Sulphonic Acid is for sulphonation of many substances, such as paraffin in preparation of detergents. It is used in the production of detergent powder, dish washing liquid and other industrial cleaning applications.

13.2 The following table shows the tariff structure (2024-25) applicable on imports of Sulphonic Acid:

Table-IV
Tariff Structure of Sulphonic Acid During the Current POR (%)

PCT Heading	Description	Customs + Add. Duty	RD	FTAs/PTAs
(1)	(2)	(3)	(4)	(5)
Chapter 34	Soap, organic surface-active agents, washing preparations, lubricating preparations, artificial waxes, prepared waxes, polishing or souring preparations, candles and similar articles, modelling pastes, “dental waxes” and dental preparations with a basis of plaster			
34.02	Organic surface- active agents (other than soap); surface- active preparations, washing preparations (including auxiliary washing preparations) and cleaning preparations, whether or not containing soap, other than those of heading 34.01. - Anionic organic surface- active agents, whether or not put up for retail sale:			

Second Sunset Review of Anti-Dumping Duties Imposed on Dumped Imports of Sulphonic Acid Imported from China, Chinese Taipei, India, Indonesia, Iran and the Republic of Korea

3402.3100	- Linear alkylbenzene sulphonic acids and their salts	11+2	10	CN_5; MY=10; MAU=0; IDN=5 LK FTA Conc. = 100%
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Source: Pakistan Customs Tariff 2024-25
Note: In 2025-26 CD 10%, ACD 0% and RD 5%

14. Domestic like Product

The domestic like product, produced by the domestic industry is Linear Alkyl Benzene Sulphonic Acid (“Sulphonic Acid”), produced by the domestic industry. It is classified under the same PCT number as the product under review is classified. The domestic like product is also used for the same purposes as the product under review is used. It is produced from the same/similar production process and raw materials as is of the product under review. Its specifications, uses and classification are same as the product under review. Further, the Commission in its original investigation had determined that the investigated product and the domestic like product are like products.

15. Period of Review

The Period of Review (“POR”) for this sunset review is from January 01, 2022, to December 31, 2024.

16. Information/Data Gathering

16.1 The Commission sent questionnaires on May 23, 2025, to all known exporters/ producers of Sulphonic Acid in the Exporting Countries whose addresses were available with the Commission, asking them to respond within 37 days of the dispatch of the questionnaires. A copy of the Questionnaire was sent to the Diplomatic Missions of the Exporting Countries in Islamabad on May 23, 2025, with a request to forward it to all known exporters/ producers of Sulphonic Acid. Questionnaires were also sent to known importers of Sulphonic Acid on May 23, 2025, requesting them to provide information within 37 days.

16.2 No response from any exporters/foreign producers and importers was received within the prescribed time. Therefore, reminders were issued to the exporters/foreign producers and importers on July 04, 2025, explaining that, if no response of the questionnaire is submitted, the Commission will be constrained to make determination of likelihood of continuation or recurrence of dumping of the product under review on the basis of “best information available” including those contained in the application submitted by the Applicants. However, none of the exporters/ foreign producers from the Exporting Countries or importers have responded to the Commission and did not provide the requisite information. Moreover, PT Kao Indonesia Chemicals submitted that they do not export LABSA to Pakistan or to any other country and accordingly submitted the response to the Exporter Questionnaire showing no data against exports.

16.3 The Commission has access to the import statistics of the Federal Board of Revenue (FBR), Government of Pakistan. For the purpose of this review, the Commission has also used import data obtained from FBR in addition to the information provided by the Applicant. In addition to this, the Commission has also obtained certain information from publicly available sources.

17. Views, Comments and Hearing

17.1 All interested parties were invited for their views/comments known to the Commission and to submit information and documents (if any) regarding this sunset review. In response, the Commission received views/comments, from Directorate General of Foreign Trade, Ministry of Trade of the Republic of Indonesia.

11.2 The interested parties were required to request for hearing in this review within 30 days of the publication of the notice of initiation under Rule 14 of the Rules. The Commission did not receive any request for hearing in this review. Therefore, no hearing was held in this review.

17.3 The Commission has reviewed all issues raised by the interested parties during the course of this review investigation and has reached this conclusion of review after consideration of all information, evidence, views and comments. Views/ comments of the interested parties germane to this review and response of the Commission are given in an annotated form at Annexure-I.

18. Verification of Information

18.1 In terms of Section 23, 32(4) and 35 of the Act and Rule 11 of the Rules, the Commission, during the course of the investigation/review, satisfied itself with the accuracy of information supplied by the interested parties to the extent possible.

18.2 In order to verify the information/data provided by the Applicants and to obtain further information (if any), the officers concerned of the Commission conducted on-the-spot verifications at the offices and plants of the Applicants on July 14 to 16, 2025 (M/s Tufail Chemical Industries Ltd.) and on July 28 to 30, 2025 (M/s Ittehad Chemicals Ltd.) Reports of on-the-spot verification were made available to the interested parties by placing them in the public file.

19. 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, submissions, notices, on-the-spot investigation reports, correspondence, and other documents for disclosure to the interested parties.

20. Confidentiality

20.1 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.

20.2 The Applicants 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, growth, investment, salaries and wages, number of employees etc. In addition to this, Applicants also provided certain information on confidential basis, as its disclosure would have adverse effect on them.

20.3 Pursuant to requests made by the Applicants, 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. 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.

21. Disclosure of Essential Facts

21.1 In terms of Rule 15(1) of the Rules, the Commission disclosed essential facts, and in this context circulated a Statement of Essential Facts (the “SEF”) on November 24, 2025, to all interested parties including Applicant, exporters/producers of Sulphonic Acid from the Exporting Countries, importers and Diplomatic Missions of the Exporting Countries in Pakistan.

21.2 Under Rule 15(2) 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. In response Colgate-Palmolive Pakistan Ltd submitted the supporting letter and support the Applicants stance for continuation of anti-dumping duties on exporting countries.

21.3 The Directorate General of Foreign Trade, Ministry of Trade of the Republic of Indonesia and the Applicants submitted comments on SEF. Views/Comments of the interested parties germane to this review investigation and response of the Commission are provided at Annexure-II of this report.

22. Determination of Likely Continuation or Recurrence of Dumping

Determination of likely continuation or recurrence of dumping of the product under review from the Exporting Countries is made in accordance with Rule 40 of the Rules and other relevant provisions of the Act. As no exporter has provided any information (paragraph 16.1 and 16.2 supra), therefore, likely continuation or recurrence of dumping of the product under review is determined on the basis of best information available. Information on these factors has been gathered/obtained from different sources including the Applicants, WEBOC, articles published in different journals, ITC and different other websites etc. The Commission has considered the following factors in determination of likely continuation or recurrence of dumping of the product under review:

- (a) whether exporters/ producers from the exporting countries stopped or continued exporting the product under review to Pakistan after the imposition of anti-dumping duties;
- (b) calculations of likely dumping margins for exporters or producers of the Exporting Countries;

- (c) the past and likely future performance of the exporters, foreign producers, including production, capacity utilization, the potential to extend production facilities, costs, sales volumes, prices, inventories, market share, exports, exportable surplus, profits, etc.;
- (d) whether exporters from the exporting countries have developed other export markets after the imposition of anti-dumping duties on dumped imports of Sulphonic Acid;
- (e) trade remedial actions taken by other countries on the exports of the product under review and whether such actions are likely to cause a diversion of imports into Pakistan;
- (f) changes in market conditions in the Exporting Countries and internationally, including changes in the supply and demand for the product under review; and
- (g) conditions of competition with non-dumped imports of the like product;

22.1 Whether exporters/producers from the Exporting Countries stopped or continued exporting the product under review to Pakistan after imposition of Anti-dumping Duty

22.1.1 The following table shows the volume of the dumped imports from the Exporting Countries, and imports from sources other than dumped sources during the last year of Period of Original Investigation (POI), last year of POR of first Review and the POR of current review are given below in the table:

Table-V
Imports of Sulphonic Acid (MT)

Country	Jul 15 – Jun 16*	Jan-Dec 2021**	2022	2023	2024
(1)	(2)	(3)	(4)	(5)	(6)
China	10.68	-	-	-	-
India	6.92	-	-	-	-
Indonesia	8.94	-	-	-	-
Iran	13.78	0.51		0.65	0.88
Korea	39.54	0.00	-	-	-
Chinese Taipei	18.89	-	-	-	-
Dumped Sources	98.74	0.51	-	0.65	0.88
Other Sources	1.26	4.20	-	0.76	0.46
Total Imports	100.00	4.71	-	1.41	1.34

* Last year of POI of original investigation

**Last year of POR of first Sunset Review

Source: WeBoc & the Applicants

Note: To keep confidentiality, actual figures have been indexed w.r.t total import figures during original POI

22.1.2 The above table shows that dumped imports declined significantly after imposition of anti-dumping duties. Imports of the Sulphonic Acid decreased from 98.74 percent during the POI for original investigation to insignificant quantities i.e. 0.51 percent and 0.88 percent during the last year of POR of the first and second sunset reviews respectively as compared to the last year of POI of original investigation. Imports from other sources also decreased and remained insignificant as compared to the POI of original investigation and POR of the first sunset review.

22.1.3 Although dumped imports of Sulphonic Acid from the Exporting Countries decreased after imposition of anti-dumping duties, however, in case anti-dumping duties imposed on the dumped imports of Sulphonic Acid from the Exporting Countries are terminated there is no likelihood of recurrence of dumping into Pakistan as the landed cost of Sulphonic Acid imported from Exporting Countries without anti-dumping duties will be higher than the domestic industry prices of the Sulphonic Acid (refer para 22.7 Infra). Further, the domestic industry has persistently demonstrated that it is able to maintain its prices below the landed cost of Sulphonic Acid imported from Exporting Countries without anti-dumping duties. (refer para 22.7 infra)

22.2 Dumping Margins for the Exporting Countries

22.2.1 The Applicants have provided information relating to the export price and normal value in the Application and subsequently in response to deficiency letters for the calculation of likely dumping margins for the exporters/foreign producers from the Exporting Countries.

22.2.3 The Applicants submitted in the application that 5 out of 6 Exporting Countries did not export to Pakistan during the last year of POR. Only Iran exported a minimal quantity during two years of the POR and such a quantity at a particular time of the POR is not representative for calculation of dumping margin. In the deficiency letter, the Applicants were asked to provide the data /information relating to the export price in terms of Rule 32 of the Rules which states that *“information on the current normal value of the product under review and the current export prices thereof or, where appropriate, the current constructed export price thereof and information, where the export price is not available, on the prices at which the product is sold from the country or countries of origin or export to a third country or countries and the prices in the country of origin or export”*.

22.2.4 In the deficiency response, the Applicants submitted the export prices from the Exporting Countries based on their exports to a third country. These prices were sourced from an online platform, Volza, which provides global import /export data for various products. However, the quantities used to calculate these export prices were even lower than the exports from Iran to Pakistan during the POR. Consequently, these export prices cannot be utilized for the calculation of the export price.

22.2. The Commission has also explored the other sources including Trademap.org for the determination of export prices for the Exporting countries. However, the data available on trademap.org is at 6 digit level which also includes other products. Therefore, this data cannot be utilized for determination of export price.

22.2.6 In view of the above, it is not possible to calculate likely dumping margins due to the unavailability of reliable export price data of the Exporting Countries.

22.3 **The past and likely future performance of the exporters, foreign producers, including production, capacity utilization, the potential to extend production facilities, costs, sales volumes, prices, inventories, market share, exports, exportable surplus, profits, etc.**

22.3.1 As stated earlier, no exporter /foreign producer from the Exporting Countries has provided any information in this review, therefore, the country-wide performance of the Exporting Countries for the product under review is assessed on the basis of best information available. Nonetheless, Rules 40 of the Rules outlines various factors that can be considered in this regard including production capacity, utilization rates, potential expansion, cost structures, pricing, inventory, market share, export volumes, profitability of the foreign producers and exporters, exportable surplus etc.

22.3.2 However, obtaining reliable or verifiable data as outlined above has proved to be challenging due to the nature of the product. Sulphonic Acid is an intermediate industrial input whose trade is largely governed by private, non-publicly disclosed business-to-business contracts. Consequently, the primary data required for forecasting likely future export potential, as contemplated by the Rule, remains unavailable.

22.3.2.1 **Exportable Surplus /Increase in Capacities in Exporting Countries:**

22.3.2.1.1 According to the information available to the Commission there are evidence indicating that the exporting countries, China, India, Iran, Indonesia, and Korea possess significant production capacities for Sulphonic Acid, leading to considerable exportable surpluses. Following are the evidence/information on the export surplus/ increase in capacities of Sulphonic Acid in exporting countries:

China:

According to the Weixian, a Chinese engineering firm (njweixian.com, March 07, 2025):

“Weixian notably commissioned the world’s largest sulphonation plant in 2021. This facility features a 180-tube reactor with a production capacity of 7.5 TPH for LABSA, 10 TPH for SLES, and 15 TPH for AOS. A second-phase plant with the same configuration is currently under construction. The company has also completed engineering and design work for 8 to 10 TPH sulphonation facilities, emphasizing economies of scale to reduce capital costs per ton and boost operational efficiency—pointing to a broader global shift toward mega-scale sulphonation plants.”

“More recently, on November 1, 2024, Weixian announced the shipment of a 3-tube pilot LABSA plant tailored for R&D and small-scale production, reinforcing its commitment to modular and scalable sulphonation systems.” (njweixian.com, November 01, 2024)

“As of January 10, 2025, Weixian is constructing a new 5 TPH sulphonation plant with a 120-tube reactor for delivery to one of China’s largest surfactant producers. Additionally, another turnkey Linear Alkylbenzene Sulfonate (LAS) production facility is also under development for Chinese company”. (njweixian.com, January 10, 2025)

According to Market Reports World, September 22, 2025, a US based market research firm (<https://www.marketreportsworld.com>):

"In 2024, global production capacity surpassed 4.2 million metric tons, with major manufacturing hubs in China, India, South Korea, and Brazil... India and China have emerged as hotbeds of investment, collectively adding over 350,000 metric tons of annual LABSA production capacity through projects in Gujarat, Maharashtra, and Zhejiang provinces."¹

India:

According to the ICRA report dated February 18, 2025:

"Basant Agro Tech (India) Limited commenced production of Linear Alkyl Benzene Sulphonic Acid (LABSA) in the fiscal year 2020-21 with an initial installed capacity of 22,000 metric tonnes per annum. In the fiscal year 2022-23, the company strategically doubled its LABSA production as compared to the previous year."

According to the Indian Chemical News dated January 08, 2021:

"Rama Phosphates Limited has set up a new manufacturing unit at its existing factory premises at Udaipur for manufacture of Linear Alkyl Benzene Sulphonic Acid (LABSA) having installed capacity of 18,000 TPA"

According to the FOGLA Group Financial Report 2021:

"Sai Sulphonates Pvt. Ltd. expanded its LABSA 90% manufacturing capacity from 81000 TPA to 91000 TPA. It also expanded its LABSA 96% plant by putting another unit having 43, 800 TPA capacity. As a result, it expanded its packaging capacity by putting a third HMHDPE Drum unit of 2,30,400 Units/annum capacity."

"Further capacity additions are supported by engineering inputs from global technology suppliers. Following the successful delivery of two sulphonation plants in previous years, Weixian has secured another order from India. The new delivery package includes a sulphonator, gas/liquid separator, and cyclone separator, and is currently in its final stages of preparation for shipment." (njweixian.com, May 06, 2023).

According to Market Reports World, September 22, 2025, a US based market research firm (<https://www.marketreportsworld.com>):

"In 2024, global production capacity surpassed 4.2 million metric tons, with major manufacturing hubs in China, India, South Korea, and Brazil... India and China have emerged as hotbeds of

¹ Linear Alkyl Benzene Sulphonic Acid Market Market Size, Share, Growth, and Industry Analysis, By Type (LABSA 96%, LABSA 90%, Others), By Application (Detergent, Emulsifier, Coupling Agent, Others), Regional Insights and Forecast to 2033

investment, collectively adding over 350,000 metric tons of annual LABSA production capacity through projects in Gujarat, Maharashtra, and Zhejiang provinces."⁽²⁾

According to TechSci Research LLC in New York, US based market research firm (<https://www.techsciresearch.com>):

"India Linear Alkyl Benzene Market achieved a total market volume of 536.78 thousand Metric Tonnes in 2024 and is poised for strong growth in the forecast period to reach 655.83 thousand Metric Tonnes in 2030, with a projected Compound Annual Growth Rate (CAGR) of 3.43% through 2030... In September 2024, Tamilnadu Petroproducts Ltd. (TPL) is set to commission the expanded capacities of its Linear Alkyl Benzene (LAB) and Caustic Soda plants, with an investment of ₹405 crore planned for FY26. As part of this initiative, the LAB plant's capacity will be increased from 120 tonnes per annum (TPA) to 145 TPA."

According to the Applicants:

"At the upstream level, India's Linear Alkyl Benzene (LAB) supply chain is also expanding. Installed LAB capacity reached approximately 536,780 metric tonnes in 2024 and is projected to grow at a CAGR of 3.43%, reaching 655,830 metric tonnes by 2030. This growth underpins continued investment momentum across the LABSA production value chain" (TechSci Research report 2024).

Iran:

"According to Volza's global import data, Iran's LABSA industry has witnessed a substantial upswing in export activity. From March 2023 to February 2024, global markets imported 314 shipments of LABSA from Iran, supplied by 46 Iranian exporters to 39 international buyers. This represents an impressive 87% increase compared to the previous twelve-month period—underscoring the rapid expansion of Iran's LABSA production and its growing footprint in global detergent supply chains. Notably, February 2024 alone recorded 49 shipments, marking a 53% year-on-year increase compared to February 2023. Even more striking, this reflects a staggering 277% jump over January 2024, signaling a sharp acceleration in monthly export volumes and highlighting Iran's rising capacity in LABSA manufacturing." (www.Volza.com)

Indonesia:

According to Sinar Mas Cepsa, a joint venture between the Indonesian conglomerate Sinar Mas and the Spanish energy company Cepsa (<https://sinarmascepsa.com/cepsa-quimica/>):

"Thanks to our recent expansion in chemical plants in Indonesia and Germany, through our Sinar Mas Cepsa joint venture, we have diversified our raw material business with fatty alcohols from natural sources, a basic ingredient in the production of detergents and personal care products."

² Linear Alkyl Benzene Sulphonic Acid Market Market Size, Share, Growth, and Industry Analysis, By Type (LABSA 96%, LABSA 90%, Others), By Application (Detergent, Emulsifier, Coupling Agent, Others), Regional Insights and Forecast to 2033

“Weixian has also commissioned from November to December 2021 sulfonation unit in Indonesia with a capacity of 6-ton LABSA and SLE” (njwixian.com January 01, 2025).

Republic of Korea:

According to the report of Marketreportsword.com dated September 08, 2025 (<https://www.marketreportsworld.com/market-reports/linear-alkyl-benzene-sulphonic-acid-market-14719582>):

“Another innovative development is micro-encapsulated LABSA, which allows controlled release of active surfactants. This technology, piloted by ISU Chemical in South Korea, enhances product shelf life and performance under variable climatic conditions. This feature is especially beneficial for export markets in Africa and the Middle East, where product stability is crucial.”

“Huntsman and a South Korean consortium initiated a \$45 million LABSA R&D hub in 2024 to develop green and specialty surfactants.”

22.3.2.1.2 From the above information and analysis, the Commission is of the view that capacity expansions in China, India, and Indonesia demonstrate the availability of exportable surpluses of LABSA while Iran shows increase in its exports of Sulphonic Acid and Korea invested in LABSA research and development. With ongoing investments, large-scale projects, and rising export trends, particularly from Iran and India, it appears that these countries are well positioned to resume exports to Pakistan if anti-dumping duties are lifted. However, landed cost of imports from these countries will be higher as compared to the domestic industry priced of Sulphonic Acid (refer para 23.4 Infra). Furthermore, unlike the situation in the original POI, the domestic industry possesses enhanced production capacity (refer para 23.6 infra) as well as an export positiveness (refer para 23.8 infra) which is likely to enable it to maintain its market share through competitive prices. Therefore, in case anti-dumping duties are terminated, there is no likelihood of recurrence or continuation of dumping of the product under review.

22.4 Whether exporters from the Exporting Countries have developed other export markets after the imposition of anti-dumping duties on dumped imports of Sulphonic Acid;

22.4.1 To analyze the trend of the exports of the Exporting Countries after the imposition of anti-dumping duties, the information available on the “Trade map” has been taken into account. It is worth mentioning that this information available in this regard on Trade Map is at 6-digit level HS code (3402.31), which may also include other products, including the product under review. The data/information relating to export destinations of Sulphonic Acid of the Exporting Countries is given in the table below:

Table-VI
Major Export destinations of Exporting Countries (MT)

CHINA	2015		2023	
340231	Philippines	11,250	Philippines	3,749
	Japan	8,923	Mozambique	3,175
	Pakistan	7,879	United Arab Emirates	2,553
	Malaysia	7,337	Guatemala	1,430
	Brazil	6,999	Tanzania, United Republic of	1,304
	Others	140,716	Others	18,062
	World	183,104	World	30,273
INDIA	2015		2023	
340231	Sri Lanka	10,278	Bangladesh	21,883
	Brazil	7,959	Brazil	20,321
	Saudi Arabia	7,642	Sri Lanka	8,497
	Bangladesh	6,074	Nepal	8,468
	Pakistan	6,015	Myanmar	5,343
	Others	53,332	Others	40,288
	World	91,300	World	104,800
INDONESIA	2015		2023	
340231	Malaysia	10,005	Malaysia	7,565
	Vietnam	8,661	Thailand	951
	India	5,494	Viet Nam	744
	China	4,576	China	639
	Myanmar	3,960	Colombia	330
	Others	15,762	Others	1,463
	World	48,458	World	11,692
IRAN	2015		2023	
340231	Iraq	2,769	Pakistan	18,961
	Pakistan	2,756	Uzbekistan	13,317
	Afghanistan	1,857	Iraq	12,941
	Uzbekistan	355	Afghanistan	5,253
	Tajikistan	301	Türkiye	3,684
	Others	511	Others	7,746
	World	8,549	World	61,902
KOREA	2015		2023	
340231	Nigeria	13,625	Colombia	11,864
	Japan	10,645	Philippines	13,239
	Senegal	10,414	Malaysia	9,440
	Philippines	9,365	Japan	10,947
	Malaysia	9,273	Mozambique	10,170

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	Others	108,074	Others	43,421
	World	161,396	World	99,081
CHINESE TAIPEI	2015		2023	
340231	Indonesia	2,700	Indonesia	2,134
	China	2,346	Hong Kong, China	319
	Malaysia	1,883	Malaysia	84
	United States of America	1,158	Tonga	31
	Philippines	1,100	Japan	24
	Others	3,834	Others	4
	World	13,021	World	2,596

Source: Trademap

22.4.2 The above table shows that after the imposition of anti-dumping duties on Sulphonic Acid, a mixed trend in exports can be observed among the Exporting Countries. The countries like India and Iran have shown an overall increase in their global exports of Sulphonic Acid. In case of China, Indonesia, Korea and Chinese Taipei, their global exports have declined which indicates to broader challenges beyond Pakistan's antidumping duties, potentially including changing domestic consumption trends, changing global demand patterns, or increased international competition. Nevertheless, only India and Iran can redirect certain quantities of Sulphonic Acid to Pakistan if the anti-dumping duties are terminated but landed cost of Sulphonic Acid from Iran is likely to be higher than the domestic industry's prices of Sulphonic Acid. Whereas, in case of India such likelihood is not present due to severed trade ties with Pakistan. The increase in exports of India and Iran to Pakistan is also may be due to the fact that the information in above table is at 6 digit level which may also include other products, besides the product under review.

22.5 Trade remedial actions taken by other countries on the exports of the product under review and whether such actions are likely to cause a diversion of imports into Pakistan;

According to the information available to the Commission, no trade remedial actions have been taken by any other countries on exports of Sulphonic Acid. However, India has imposed Anti-Dumping duties on dumped imports of Linear Alkyl Benzene (which is the raw material for Sulphonic Acid) from Iran on June 23, 2025 for a period of five years, ranging from US\$ 14 /MT to US\$ 54 /MT.

22.6 Changes in market conditions in the exporting country and internationally, including changes in the supply of and demand for the product under review;

22.6.1 Sulphonic Acid Global Market and Demand:

According to the Credence Research Report:

(<https://www.credenceresearch.com/report/linear-alkylbenzene-sulfonic-acid-labsa-market>)

“Linear Alkylbenzene Sulfonic Acid (LABSA) Market size was valued at USD 9160 million in 2024 and is anticipated to reach USD 11694.04 million by 2032, at a CAGR of 3.1% during the forecast

period (2024-2032). The growth of the LABSA market is driven by the increasing demand for cleaning and personal care products, supported by rising hygiene awareness and urbanization. The surge in consumption of detergents and liquid soaps in residential and commercial sectors, especially in emerging economies, fuels product adoption. Additionally, ongoing innovations in detergent formulations and the preference for cost-effective surfactants with high efficacy further elevate LABSA's market demand. The chemical's compatibility with other detergent ingredients and its effectiveness in hard water conditions make it a preferred choice among manufacturers. Moreover, sustainability trends and regulatory pushes toward biodegradable substances reinforce the shift toward LABSA in place of non-biodegradable alternatives. Strategic partnerships between chemical producers and FMCG companies are also accelerating product development and application expansion. Furthermore, the increasing focus on green chemistry is expected to drive further investment in LABSA-based formulations.

Regionally, Asia Pacific dominates the global LABSA market, accounting for a significant share due to high population density, rapid urban growth, and increasing consumer spending on hygiene products. Countries such as China, India, and Indonesia lead in consumption and production, driven by well-established detergent manufacturing industries. Europe follows as the second-largest market, propelled by strict environmental norms and advanced formulation technologies. Meanwhile, North America exhibits steady demand, whereas Latin America and the Middle East & Africa are emerging as promising markets due to growing industrialization and urbanization. Regional players are expanding production capacity to meet domestic and export demand, reinforcing supply chain resilience. Additionally, favorable government policies and increased foreign direct investments are boosting industrial output and market penetration across developing regions".

According to the report of Marketreportsword.com dated September 08, 2025 (<https://www.marketreportsworld.com/market-reports/linear-alkyl-benzene-sulphonic-acid-market-14719582>):

"Between 2022 and 2024, LAB prices experienced a fluctuation range of 20%–38%, primarily due to geopolitical disruptions and global energy supply-chain constraints."

22.6.2 Changes in Market Conditions of Sulphonic Acid in the Exporting Countries:

China:

In 2024, the LABSA market in China experienced a shift from relative stability in the early part of the year to mounting pressures of oversupply and price weakness toward its close. Strong demand at the start, driven by household detergents, hygiene products, and seasonal restocking, supported higher prices alongside elevated feedstock costs. However, as the year progressed, downstream sectors such as industrial cleaning and textiles began reducing purchases, while buyers delayed procurement in anticipation of lower prices, leading to inventory accumulation. Supply remained steady with adequate feedstock availability, and producers were slow to curb output, resulting in excess supply in the market. By the end of the year, falling feedstock prices, weak export pull, and subdued domestic consumption reinforced downward price pressure, leaving the market oversupplied and margins under strain. (Procurementresource.com)

India:

In India during 2024, LABSA prices rose in early months driven by strong downstream demand (detergents/cleaners) and seasonal effects; by mid- to later-year, the market experienced softening demand and oversupply pressures, leading to price declines or reduced upward momentum (Procurementresource.com).

Indonesia:

Indonesia's LABSA market has been characterized by moderate and uneven demand, with household detergent consumption no longer expanding at earlier high rates. On the supply side, steady inflows of regional surplus material, particularly from larger producers, have created conditions of excess availability. This imbalance of weak demand and oversupply has kept market prices under pressure, highlighting Indonesia's exposure to diversion of surplus volumes within the Asia Pacific region (cognitivemarketresearch.com).

Iran:

In 2024, Middle East including Iran's LABSA market showed only moderate domestic demand growth, largely from soaps and detergents, while supply remained steady and at times surplus. Feedstock availability was stable, but oversupply in the wider region and price competition exerted downward pressure on margins. Overall, the market was characterized by adequate supply outpacing consumption, leaving producers operating in a cautious pricing environment. (cognitivemarketresearch.com)

South Korea:

In South Korea, the LABSA market in Q1 2025 experienced a downturn as prices fell by about 3.5% compared to Q4 2024. This decline reflected a combination of reduced demand from major downstream sectors, such as detergents and cleaning products, and increased inventory levels, which created a surplus in the market. The oversupply situation placed pressure on producers, limiting their ability to stabilize prices despite steady feedstock availability (price-watch.ai).

Chinese Taipei:

Taiwan's LABSA market in recent years has reflected modest and slowing demand growth, largely limited to detergents and household cleaning segments. At the same time, regional oversupply from larger producers such as China and South Korea has put pressure on Taiwan's market, making it vulnerable to price competition. This imbalance suggests that supply consistently outpaces local consumption, reinforcing a weak-demand, oversupplied environment. (cognitivemarketresearch.com)

22.6.3 On the basis of information and analysis in the preceding paragraphs, the Commission concludes that the global LABSA demand is rising but exporting countries are experiencing weakening demand, oversupply, and price pressures, with China, India, Indonesia, Iran, South Korea, and Chinese Taipei all showing trends of inventory build-up and reduced downstream purchasing. These adverse conditions could create a need for exporters /producers from the Exporting Countries to direct their exports to Pakistan, if the anti-dumping duties are removed. However, landed cost of imports from the Exporting Countries will be higher as compared to the sale price of the domestic industry of Sulphonic Acid (refer para 23.4 Infra).

22.7 Conditions of competition with non-dumped imports of the like product

22.7.1 The information relating to the imports and landed cost of Sulphonic Acid from the exporting countries, and other than dumped sources and the cost to make and sell/ prices of domestic like product during the last year of period of original investigation, last year of POR of first sunset review and the POR of the current review are given below in the table:

Table-VII
Quantity of Imports and Prices of Sulphonic Acid

Period	Imports from Dumped Sources (MT)	Imports from Other Sources (MT)	***Sales of the Domestic industry (MT)	Landed cost from Dumped Sources without ADD (Rs/MT)	Landed cost from Dumped Sources with ADD (Rs/MT)	Landed Cost of Imports from Other Sources (Rs/MT)	Domestic product's price (Rs/MT)	Domestic product's Cost to make and sell (Rs/MT)
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Jul 15 – Jun 16*	100.00	1.28	268.91	112.09	-	110.55	100.00	97.65
Jan- Dec 21**	0.52	4.26	714.13	205.85	239.19	206.90	177.04	165.46
Jan - Dec 22	-	-	697.49	-	-	-	239.24	242.03
Jan - Dec 23	0.66	0.77	600.98	333.57	387.58	403.30	302.23	281.80
Jan - Dec 24	0.89	0.47	587.87	328.37	381.54	383.86	293.26	291.44

* Last year of POI of original investigation

**Last year of POR of first Sunset Review

Source: the Applicants and FBR

***Total industry sales= Applicants and supporting producers' sales + Other producers (Other producers sales work out on the basis of Applicant capacity utilization) Note: To keep confidentiality, actual volume figures have been indexed w.r.t total import figures during original POI and cost & prices figures have been indexed w.r.t domestic product price figures during original POI

22.7.2 The above table shows that non-dumped imports have entered the market in limited quantities and at significantly higher landed cost compared to the domestic industry's selling prices as well as landed cost of other imports. The Commission is of the view that, given this pricing disparity and the minimal volume of such imports, the domestic industry did not face any significant threat or displacement from these sources. On the contrary, it retained its dominant position by supplying over 99% of the market demand and sustaining high sales volumes throughout the POR.

22.8 Based on the information and analysis in paragraphs 22.1 to 22.7 supra, it is concluded that there is no likelihood of recurrence and continuation of dumping of the product under review if antidumping duty on dumped imports is terminated.

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

23.1 Likely recurrence and continuation of injury to the domestic industry is determined in accordance with Rule 41 of the Rules and other relevant provisions of the Act. The Commission has considered relevant factors to determine likely continuation or recurrence of injury to the

domestic industry. To determine likelihood of continuation or recurrence of injury to the domestic industry, the Commission, *inter alia*, considered following factors:

- i. Likely change in volume of imports of the product under review if anti-dumping duty is terminated;
- ii. Likely impact of imports of the product under review on prices of the domestic like product with and without anti-dumping duty;
- iii. Consequent likely impact on the domestic industry, which includes likely and potential decline in: sales, profits, output, market share, productivity, return on investment, capacity utilization and likely negative effects on: cash flow, inventories, employment, wages, growth, ability to raise capital or investments; and
- iv. Changes in market conditions in the economy of Pakistan and internationally, including changes in the supply of and demand for the imports of the product under review

23.2 The Commission sent questionnaires to other domestic producers to obtain necessary information, however, none of the other domestic producers provided any information (paragraph 13.2 supra). Therefore, the Commission is constrained to determine likely continuation or recurrence of injury to the domestic industry on the basis of Applicants' information. As the Applicants accounted for about 38.71 percent of total production during 2024 (Table-III supra), therefore, likelihood of continuation or recurrence of injury for the domestic industry is inferred from the Applicants information. However, to assess total production of the domestic like product and total domestic market, the production and sales of the other supporting units i.e. Tufail Multichem industries (Pvt.) Ltd. and Chaudhry Shafique Manufacturing Pvt. Ltd. is taken and production and sales of other units are assumed/ worked out on the basis of capacity utilization of the Applicants during the POR. Likelihood of continuation or recurrence of injury to the domestic industry is provided in the following paragraphs.

23.3 Likely Effect on Volume of Dumped Imports

23.3.1 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 duty is terminated.

23.3.2 Following table shows imports of the Sulphonic Acid and domestic consumption of the product under review during the last year of period of original investigation, last year of POR of first Review and the POR of current review:

Table-VIII

Imports of Sulphonic Acid (MT)

Year/Period	Dumped imports	Imports from other sources	Total Imports	Total domestic consumption	Dumped as % of	
					Total Imports	Domestic consumption
(1)	(2)	(3)	(4)	(5)	(6)	(7)
Jul 15 – Jun 16*	27.01	0.34	27.36	100.00	98.74	27.01
Jan – Dec 21**	0.14	1.15	1.29	194.20	10.80	0.07
Jan - Dec 22	0.00	0.00	0.00	188.42	-	-
Jan - Dec 23	0.18	0.21	0.39	162.73	45.90	0.11
Jan - Dec 24	0.24	0.13	0.37	159.17	65.51	0.15

* Last year of POI of original investigation

**Last year of POR of first Sunset Review

Source: WeBoc & the Applicants Note: To keep confidentiality, actual figures have been indexed w.r.t total domestic consumption figures during original POI

23.3.3 The above table shows that the volume of total imports which mainly consisted of dumped imports (i.e. 99% of total imports) sharply decreased from 27.36 percent in the POI to only 0.37 percent in the year 2024 as compared the POI of original investigation. The dumped imports during the POR remained insignificant as compared to the POI i.e. when the dumped imports were 27 percent of the total domestic consumption reduced to below 1 percent during the last year of first POR as well as POR of this sunset review.

23.3.4 However, it appears from table-VII above that the import prices of Sulphonic Acid have increased significantly and remained considerably higher than the cost to make and sell of the domestic like product during the POR. Resultantly, the domestic industry has captured the entire domestic market and imports of the Sulphonic Acid from dumped sources as well as from other sources have almost disappeared from the domestic market.

23.3.5 The Commission has concluded that termination of anti-dumping duties on dumped imports of Sulphonic Acid would not be likely to lead to significant increase in the volume of dumped imports. Therefore, termination of antidumping duties on dumped imports would not be likely to lead to the recurrence of injury to the domestic industry on account of the increase in volume of dumped imports.

23.4 Likely Price Effects on the Domestic Like Product

23.4.1 Likely effects of dumped imports on the sales price of the domestic like product in the domestic market has been examined in the following paragraphs to establish whether there is likelihood of price undercutting (the extent to which the price of the product under review will be lower than the price of the domestic like product), price depression (the extent to which the domestic industry may experience decrease in its selling prices of domestic like product) and price suppression (the extent to which increased cost of production would not be recovered by way of increase in selling price of the domestic like product) if anti-dumping duties imposed on dumped import of Sulphonic Acid from the Exporting Countries expires.

23.4.2 Likelihood of Price Undercutting

23.4.2.1 Information /data on the weighted average ex-factory price of the domestic like product and weighted average landed cost of the product under review, with and without anti-dumping duties during the last year of POI, last year of the POR of first review and the POR of current review are given in the following table:

Table-IX
Likely Price Undercutting (Rs./MT)

Year/Period	Domestic product's price	Landed cost of dumped		Price undercutting	
		Without ADD	With ADD	Without AD. Duty	With AD. Duty
(1)	(2)	(3)	(4)	(5)	(6)
Jul 15 – Jun 16*	100.00	112.09	---	---	---
Jan – Dec 21**	177.04	205.85	239.19	---	---
Jan - Dec 22	239.24	---	---	---	---
Jan - Dec 23	302.23	333.57	387.58	---	---
Jan - Dec 24	293.26	328.37	381.54	---	---

* Last year of POI of original investigation

**Last year of POR of first Sunset Review

Source: the Applicants and WeBoc Note: To keep confidentiality, actual figures have been indexed w.r.t total domestic price figures during original POI

23.4.2.2 It is evident from the above table that landed cost of dumped imports of Sulphonic Acid from the Exporting Countries remained significantly higher than the sales prices of domestic like product's price during the original POI as well during the POR. The increase in landed cost of the product under review is due to an increase in its price coupled with significant depreciation of Pak Rupee vis-à-vis US Dollar as during the original POI the exchange rate of one US\$ was Rs.104, which has increased to Rs.278 in the year 2024 (an increase of 167%). Resultantly, there was neither price under-cutting in the original POI nor after imposition of anti-dumping duties, even without anti-dumping duties. The Commission concluded that there is no likelihood of price undercutting of the product under review in case anti-dumping duties are removed.

23.4.3 Likelihood of Price Depression

23.4.3.1 The information provided in Table-VII above shows that the domestic industry did not suffer price depression after the imposition of anti-dumping duties except in the year 2024 which was relatively minor. However, the said table also indicates that the landed cost of the product under review even without anti-dumping duties is significantly higher than the domestic like product's price, therefore, in case anti-dumping duties are removed there is no likelihood that the domestic industry would be under any pressure to reduce its price of the domestic like product to compete with imports. The Commission concluded that the domestic industry will not face price depression if anti-dumping duties imposed on dumped imports of Sulphonic Acid from the Exporting Countries are terminated.

23.4.4 **Likelihood of Price Suppression:**

23.4.4.1 The following table shows information with regard to the weighted average cost to make and sell and the weighted average ex-factory sales price of the domestic like product:

Table-X
Likely Price Suppression (Rs./MT)

Year/ Period	Domestic like product's		Increase/(decrease) in		Price Suppression
	Cost to make and sell	Ex-factory price	Cost to make and sell	Price	
(1)	(2)	(3)	(4)	(5)	(6)
Jul 15 – Jun 16*	100.0	102.4	-	-	-
Jan – Dec 21**	169.5	181.3	-	-	-
Jan - Dec 22	247.9	245.0	78.4	63.7	14.7
Jan - Dec 23	288.6	309.5	40.7	64.5	-
Jan - Dec 24	298.5	300.3	9.9	(9.2)	19.1

* POI of original investigation

Source: the Applicants and FBR

**POR of first Sunset Review

Note: To keep confidentiality, actual figures have been indexed w.r.t total cost to make and sell figures during original POI

23.4.4.2 The above table shows that the domestic industry did not experience price suppression during the original POI till 2021, as it recovered increased cost to make and sell by way of increase in its selling price. However, there was price suppression of around 6 percent in the year 2022 and 2024, which cannot be attributed to the volume of dumped imports from the Exporting Countries or other sources as landed cost was significantly higher than the sale prices of Sulphonic Acid with and without anti-dumping duties.

23.4.4.3 On the above information and analysis the Commission has concluded that there is no likelihood of injury to the domestic industry on account of price suppression if anti-dumping duties are terminated on imports of the product under review.

23.5 **Likely Effects on Sales and Market Share of the Domestic Industry**

23.5.1 Following table shows the sales made by the domestic industry and its market share in the domestic market during the last year of POI of original investigation, last year of the POR of first review and the POR of current review. As sales figures of other domestic producers who are indifferent in this review are not available, therefore, to establish total domestic market production of the other producers has been assumed as their sales. Total domestic market has been worked out by taking sales of the two Applicant units and adding production of other producers during the POR.

Table-XI
Sales and Market Share

Year/Period	Domestic Industry's Sales**		Imports from:				Total Market	
			Dumped Sources		Others			
	MT	%share	MT	%share	MT	%share	MT	%change
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Jul 15 – Jun 16*	72.64	72.64	27.01	27.01	0.34	0.34	100.00	-
Jan – Dec 21**	192.91	99.34	0.14	0.07	1.15	0.59	194.20	94.2
Jan - Dec 22	188.42	100	-	-	-	-	188.42	88.4
Jan - Dec 23	162.35	99.76	0.18	0.11	0.21	0.13	162.73	62.7
Jan - Dec 24	158.80	99.77	0.24	0.15	0.13	0.08	159.17	59.2

*Last year of POI of original investigation

**Last Year of POR of first Sunset Review

Source: the Applicants and FBR

**Total industry sales= Applicants and supporting producers' sales + Other producers

*** % change vis-à-vis original POI Note: To keep confidentiality, actual figures have been indexed w.r.t total market figures during original POI

23.5.2 The above table shows that the total domestic market witnessed an overall increase of 59.20% since the imposition of anti-dumping duties. After the imposition of anti-dumping duties, the domestic industry's share in the domestic market increased from 72.64% in the original POI to 99.77 percent in the last year of the current POR. Whereas, the share of non-dumped imports continued to remain insignificant prior to and after the imposition of anti-dumping duties.

23.5.4 Dumped imports of the product under review were 27 percent of the domestic demand during the original POI and declined to less than one percent (0.15 percent) in the year 2024. The domestic industry, as a result of imposition of antidumping duties, were able to increase its share by taking over share left by the dumped sources in an expanding domestic market.

23.5.5 On the basis of fore-going information and analysis there is no likelihood of a significant increase in the volume of dumped imports of the product under review, if the anti-dumping duties are removed (paragraph 22 supra), resultantly there is no likelihood of a significant increase in market share of dumped imports of the product under review. Therefore, it is concluded that the domestic industry would not suffer injury on account of sales and market share.

23.6 Likely Effects on Production and Capacity Utilization

23.6.1 The following table shows installed production capacity, production of the domestic like product and capacity utilization of the domestic industry during the last year of period of original investigation, last year of POR of previous Review and the POR of current review:

Table – XII
Production and Capacity Utilization (MT)

Year/ Period	Installed Capacity	Quantity Produced	Capacity Utilization (%)
(1)	(2)	(3)	(4)=3/2
Jul 15 – Jun 16*	100.0	82.7	82.67
Jan – Dec 21**	421.3	228.0	54.11

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Jan - Dec 22	466.4	248.5	43.26
Jan - Dec 23	505.7	206.1	37.79
Jan - Dec 24	505.7	193.1	38.18

* Last year of POI of original investigation

**Last year of POR of first Sunset Review and entire domestic industry

Note: for 2022, 2023 and 2024 data is for entire domestic industry. Note: To keep confidentiality, actual figures have been indexed w.r.t total installed capacity figures during original POI

23.6.2 The above table shows that the installed production capacity of the domestic industry has significantly increased and increased by 406 percent per annum in the last year of the current POR as compared to POI of original investigation. The domestic industry made significant investments to increase its capacity to cater entire domestic demand as well as to start exports.

23.6.3 Production of the domestic like product also increased significantly. Production which were 82 percent of total installed capacity in POI of original investigation increases to 193.1 percent as compare to POI of original investigation. Despite the increase in production volume the capacity utilization of the domestic industry declined during the current POR due to significant increase in installed production capacity.

23.6.3 As there is no likelihood of a significant increase in the volume of dumped imports of the product under review if the anti-dumping duties are terminated (paragraphs 22 and 23.3 supra), therefore, there is no likelihood that the domestic industry would have to reduce production of the domestic like product. Further, the installed capacities of domestic industry are significantly more than the domestic demand of Sulphonic Acid, as the domestic industry already holds 99 percent of the total domestic market of the.

23.6.4 Based on the above information and analysis it is concluded that the domestic industry would not be likely to face injury on account of production and capacity utilization in case of termination of the anti-dumping duties imposed on dumped imports of Sulphonic Acid from the Exporting Countries.

23.7 Likely Effects on Profits

23.7.1 Net profits/(loss) of the domestic industry during the last year of period of original investigation, last year of POR of first Review and POR of current review are given in the following table:

Table-XIII
Profits and Profitability

Year/Period	Net Profitability (Rs. in million)
(1)	(2)
Jul 15 – Jun 16*	100.0
Jan – Dec 21**	558.9
Jan - Dec 22***	(176.0)
Jan - Dec 23***	869.0
Jan - Dec 24***	62.8

Sources: The Applicants

* Last year of POI of Original Investigation

Last year of POR of first Sunset Review *Net Profit on domestic sales and intercompany sales only

Note: To keep confidentiality, actual figures have been indexed w.r.t total net profit figures during original POI

23.7.2 The above table depicts that the Applicants earned profits in the POI of original investigation as well as during the POR of first sunset review. However, there was net loss during the first year of current POR. Net profit of the Applicants significantly increased in year 2023 and then decreased during the last year of POR i.e. 2024. One of the reasons of distortion in net profits of the Applicants is due to change of Applicants in current POR as compared to the original investigation and first sunset review.

23.7.3 As there is no likelihood of price suppression to be faced by the domestic industry if anti-dumping duties are removed from dumped imports of the product under review (paragraph 23.4 supra), resultantly there is no likelihood of a decline in profits of the domestic industry. Therefore, the Commission concluded that there is no likelihood of adverse effects on profits and profitability of the domestic industry as a result of a termination of anti-dumping duties on dumped imports of the product under review.

23.8 Likely Effects on Inventories

23.8.1 Inventory position of Applicant units during last year of the POI of original investigation, last year of the POR of first Review and the POR of current review is given in the following table:

Table – XIV
Applicant's Inventories of the Domestic Like Product (MT)

Year	Opening inventory	Production	Sales		Closing inventory
			Domestic	Exports	
(1)	(2)	(3)	(4)	(5)	(6)
Jul 15 – Jun 16*	1.5	101.7	100.0		3.2
Jan – Dec 21**	1.5	120.7	106.6	11.9	3.7
Jan - Dec 22	5.8	175.3	160.7	14.7	5.7
Jan - Dec 23	5.7	119.8	118.5	1.8	5.2
Jan - Dec 24	5.2	92.0	90.4	0.3	6.5

Sources: The Applicants

* Last year of POI of Original Investigation

**Last Year of POR of first Sunset Review Note: To keep confidentiality, actual figures have been indexed w.r.t total domestic sales figures during original POI

23.8.2 The above table shows that after imposition of anti-dumping duties, production and sales of the Applicants have increased significantly till 2022. However, production and sales decreased during 2023 and 2024. Closing inventory level of the domestic like product also increased after imposition of antidumping duties, due to increase in the production and decrease in exports during the POR.

23.8.3 The above information shows that there is no likelihood that the termination of anti-dumping duties on dumped imports of Sulphonic Acid from the Exporting Countries would likely lead to increase in volume of dumped imports, which would not negatively affect production and sales of the domestic like product. Therefore, termination of anti-dumping duties on dumped imports of Sulphonic Acid would not negatively affect inventories of the domestic domestic industry.

23.8.4 Based on this information, the Commission concludes that the domestic industry would not experience a decline in sales of the domestic like product, resulting in no adverse effects on inventories if anti-dumping duties are terminated.

23.9 Likely Effect on Employment, Productivity and Wages

23.9.1 The information regarding employment in the domestic industry, productivity per worker and salaries & wages paid for production of the domestic like product during the last year of period of original investigation, last year of POR of first Review and the POR of current review is given in the following table:

Table – XV
Applicant's Employment, Productivity and Wages

Year/Period	Number of employees	Salaries & Wages (Millions Rs)	Production (MT)	Productivity (MT/worker)	Salaries & wages (Rs/ MT)
(1)	(2)	(3)	(4)	(5)	(6)
Jul 15 – Jun 16*	100.00	100.00	100.00	100.00	100.00
Jan – Dec 21**	193.33	463.59	118.69	61.40	390.11
Jan - Dec 22	820.00	1584.63	172.41	21.03	918.68
Jan - Dec 23	906.67	2074.47	117.79	13.00	1760.44
Jan - Dec 24	720.00	1804.02	90.43	12.54	1993.41

Sources: The Applicants

* Last year of POI of Original Investigation

**Last Year of POR of first Sunset Review

Note: To keep confidentiality, actual figures have been indexed w.r.t total figures during original POI

23.9.2 The above table shows that the employment in the domestic industry has increased more than 600 percent after imposition of antidumping duties. Salaries and wages have also increased in total and on per MT basis during POR as compared to POI of original investigation and POR of first sunset review. However, productivity per worker decreased throughout the current POR. The decrease in productivity per worker was mainly due to increase in employment necessary for operation of enhanced production capacities.

23.9.3 As it is established in paragraph 23.3 supra, there is no likelihood of a significant increase in the volume of imports of the product under review if anti-dumping duties are removed, therefore, there is no likelihood that the domestic industry would be forced to reduce production and sales of the domestic like product. This situation would not likely adversely affect employment, productivity, and salaries & wages of the domestic industry.

23.10 Likely Effect on Investment and Return on Investment

23.10.1 The information regarding the return on investment of the Applicants during the last year of period of original investigation, last year of POR of first Review and the POR of current review is given in the following table:

Table – XVI
Applicant's Return on Investment

Year/Period	Equity (Rs. Million)	Long term loans (Rs. Million)	Total Investment (Rs. Million)	Return* (Rs. Million)	Return on Investment (%)
(1)	(2)	(3)	(4)=(2)+(3)	(5)	(6)
Jul 15 – Jun 16**	-	-	100.00	14.42	14.43
Jan – Dec 21***	-	-	351.50	45.83	13.03
Jan - Dec 22	525.21	63.84	589.05	71.63	12.16
Jan - Dec 23	603.90	41.13	645.03	124.57	19.31
Jan - Dec 24	659.99	28.21	688.25	91.61	13.31

Sources: The Applicants *Profit+ Interest paid on long term loans ** Last year of POI of Original

Investigation ***Last Year of POR of first Sunset Review

Note: To keep confidentiality, actual figures have been indexed w.r.t total investment figures during original POI

23.10.2 The above table shows that the domestic industry's return on investment increased during the second year of current POR i.e. Jan- Dec 2023 but decreased during last year of the current POR. According to the information available to the Commission this is due to the increased investment by the domestic industry which will yield benefits gradually with increased production, increased capacity utilization, increased domestic and export sales.

23.11 Likely Effects on Cash Flow

23.11.1 Total net cash flow of the entire operations of the Applicants during last year of period of original investigation, last year of POR of first Review and the POR of current review is given in the following table:

Table – XVII
Applicant's Cash Flows

Year	Cash Flows (Rs. in Million)
(1)	(2)
Jul 15 – Jun 16*	(100.0)
Jan – Dec 21**	955.1
Jan - Dec 22	479.4
Jan - Dec 23	2161.5
Jan - Dec 24	558.7

* POI of Original Investigation

Sources: the Applicants

23.11.2 The above table shows that the cash flow of the domestic industry improved significantly after the imposition of anti-dumping duties. During the original POI there is negative cash flow. However, after the imposition of anti-dumping duties cash flows improved significantly during the last year of first sunset review and reaches to positive cash flow during the last year of POR current review i.e. Jan – Dec 2024.

23.11.3 As there is no likelihood of adverse/ negative effects on production, sales and prices of the domestic like product due to termination of anti-dumping duty on dumped imports of the product under review, therefore, there is no likelihood of effect on cash flows of the domestic industry if anti-dumping duties are terminated on dumped imports of the product under review.

23.12 Likely Effects on Growth and Ability to Raise Investment

23.12.1 As stated earlier that domestic industry has made significant investments and has increased its capacity manifold in recent past, therefore, after imposition of antidumping duties on dumped imports of the product under review the domestic industry has witnessed significant growth. Resultantly, the domestic industry has not only captured entire domestic market but also entered the export market and now is exporting a considerable volume of Sulphonic Acid (Table-XIV supra). This situation will not adversely affect the domestic industry's further growth, investment and its ability to raise capital.

23.13 Changes in market conditions in the economy of Pakistan and internationally, including changes in the supply of and demand for the imports of the product under review

23.13.1 According to the Economic Survey 2023-24,

“Global growth decelerated due to sluggish performance in advanced economies amid contractionary monetary policy stance to tackle inflation. Global economic growth has slowed down from 3.5% in 2022 to 3.2% in 2023 and is projected to continue at the same pace in 2024 and 2025, below the historical (2000-2019) annual average of 3.8%. Global inflation is expected to fall from 6.8% in 2023 to 5.9 % in 2024 and 4.5 % in 2025. The world merchandise trade volume is projected to grow by 2.6% in 2024 (-1.2% in 2023) before picking up to 3.3% in 2025 (WTO). Geopolitical tensions have emerged as the predominant risk to the global economic landscape. Presently, conflicts in Eastern Europe and the Middle East, critical hubs for global food and energy distribution, pose imminent challenges.”

“In fiscal year 2024, Pakistan's GDP increased by 2.38 percent, with strong growth in agriculture sector which expanded by 6.25 percent compared to 2.27 percent growth in last year. While both the industrial and services sectors grew by 1.21 percent. Large-Scale Manufacturing (LSM) remained in negative territory at -0.1 percent during July-March FY 2024, an improvement compared to the minus 7.0 percent growth in the corresponding period last year. During this period, 11 out of 22 sectors witnessed growth, including Food, Wearing Apparel, Leather, Wood Products, Coke & Petroleum Products, Chemicals, Pharmaceuticals, Rubber Products, Machinery & Equipment, Furniture, and Other Manufacturing (e.g., footballs)”

23.13.2 The demand of Sulphonic Acid in domestic market increased more than 62 percent in 2024 as compared to the period of original investigation i.e. 2015-16 (table XI supra) and domestic installed capacities of Sulphonic Acid also increased more than 5 times during this period (table XII supra).

23.13.3 According to the Credence Research Report:
(<https://www.credenceresearch.com/report/linear-alkylbenzene-sulfonic-acid-labsa-market>)

“Linear Alkylbenzene Sulfonic Acid (LABSA) Market size was valued at USD 9160 million in 2024 and is anticipated to reach USD 11694.04 million by 2032, at a CAGR of 3.1% during the forecast period (2024-2032). The growth of the LABSA market is driven by the increasing demand for cleaning and personal care products, supported by rising hygiene awareness and urbanization.

The surge in consumption of detergents and liquid soaps in residential and commercial sectors, especially in emerging economies, fuels product adoption. Additionally, ongoing innovations in detergent formulations and the preference for cost-effective surfactants with high efficacy further elevate LABSA's market demand. The chemical's compatibility with other detergent ingredients and its effectiveness in hard water conditions make it a preferred choice among manufacturers. Moreover, sustainability trends and regulatory pushes toward biodegradable substances reinforce the shift toward LABSA in place of non-biodegradable alternatives. Strategic partnerships between chemical producers and FMCG companies are also accelerating product development and application expansion. Furthermore, the increasing focus on green chemistry is expected to drive further investment in LABSA-based formulations

23.13.4 The domestic market of Sulphonic Acid increased during the current POR as compared to last year of the POI original investigation. With the increasing population, Applicants, who have already increased their production capacities have opportunities to increase their domestic and export sales which would reduce their fixed cost.

23.13.5 As there is no likelihood of significant increase in volume of dumped imports of the product under review if anti-dumping duties are terminated (paragraph 23.3 supra) and as a result of changes in market conditions the Applicants have opportunity to grow without facing the competition from dumped imports.

23.14 Summing up Likely Recurrence or Continuation of Injury

On the basis of information and analysis in the preceding paragraphs the Commission has reached to the conclusion that neither there is likelihood of increase in dumped imports of the product under review nor likelihood of recurrence of injury to the domestic industry on account of volume of dumped imports, prices of the domestic like product, production, sales or market share in case of termination of anti-dumping duties, therefore, there is no likelihood of consequential adverse effects on other injury factors such as: profits, capacity utilization, inventories, cash flows, employment, productivity, return on investment or ability to raise capital etc.

D. CONCLUSIONS

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

- (a) The domestic industry filed an application for sunset review of anti-dumping duty imposed on dumped imports of Sulphonic Acid from the Exporting Countries within prescribed time-period in accordance with Section 58(3) of the Act in response to the notice of impending expiry of the anti-dumping duties. The application fulfils the requirements of Sections 24 and 48 of the Act and Rule 32 of the Rules.
- (b) There is no likelihood of recurrence of dumping of the product under review from the Exporting Countries if anti-dumping duties imposed on dumped imports of the product under review are terminated, because dumped imports of Sulphonic Acid became uncompetitive due to increased prices and the exporters /producers of the

Exporting Countries almost stopped their exports of the product under review to Pakistan.

- (c) The recent changes in the market condition in Pakistan as well as internationally are likely to strengthen the Applicant's ability to grow without facing the competition from the dumped imports of the product under review if the anti-dumping duties are terminated.
- (d) Termination of anti-dumping duty imposed on dumped imports of the product under review from the Exporting Countries will not be likely to increase in volume of dumped imports, thus there is no likelihood of recurrence of injury to the domestic industry on accounts of price depression and price suppression, decline in domestic industry's production, capacity utilization, sales, market share and adverse effect on profits, inventories, return on investment (ROI), employment and productivity.

E. TERMINATION OF DEFINITIVE ANTI-DUMPING DUTIES

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

26. 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 not be likely to lead to continuation/recurrence of dumping and injury to the domestic industry. The Commission has, therefore, decided to terminate the antidumping duties with effect from January 19, 2026 imposed on dumped imports of the product under review.

(Ahmed Sheraz)
Member
January 16, 2026

(Imran Zia)
Member
January 16, 2026

(Muhammad Iqbal Tabish)
Member
January 16, 2026

(Naeem Anwar)
Member
January 16, 2026

(Abdul Rashid Sheikh)
Chairman
January 16, 2026

Annex-I

Comments of Interested Parties	NTC View
<p>Views and Comments from Directorate General of Foreign Trade, Ministry of Trade of the Republic of Indonesia.</p>	
<p>1. Reliance on Trade Remedy Instruments.</p> <p><i>GOI is of the view that the continued application of such duties over more than seven years is sufficient to have addressed any material injury that the domestic industries may have experienced.....</i></p> <p><i>The GOI also emphasizes that Pakistan's ongoing reliance on trade remedy measures to maintain the performance of its domestic industry may not fully reflect the intent and spirit of the WTO framework.....</i></p>	<p>Under the Act and Rules, the key consideration of this sunset review is whether dumping and injury are likely to continue or recur if the duties are withdrawn. Accordingly, the objective of a sunset review is to evaluate this likelihood, irrespective of the duration of the existing measures.</p> <p>Article 11.3 of the WTO Anti-Dumping Agreement explicitly allows for the continuation of measures beyond five years where a duly substantiated review demonstrates a likelihood of continuation or recurrence of dumping and injury.</p>
<p>2. Absence of Export Activities from Indonesia During the Review Period.</p> <p><i>Based on official records from the Indonesian Central Bureau of Statistics, the GOI finds that there were no exports of the subject product from Indonesia to Pakistan during the entire review period....</i></p>	<p>Although dumped imports of Sulphonic Acid from the Exporting Countries decreased after imposition of anti-dumping duties, however, in case anti-dumping duties imposed on the dumped imports of Sulphonic Acid from the Exporting Countries are terminated there is no likelihood of recurrence of dumping into Pakistan as the landed cost of Sulphonic Acid imported from Exporting Countries without anti-dumping duties will be higher than the domestic industry prices of the Sulphonic Acid. (Refer para 22.1.3 of the report)</p>
<p>3. No likelihood of Continued or Recurring Dumping or Injury attributable to Indonesia.</p>	<p>The Commission reiterates that Article 11.3 of the WTO Anti-Dumping Agreement does not require evidence of dumping during</p>

<p><i>By Article 11.3 of the WTO Anti-Dumping Agreement, a definitive anti-dumping duty shall be terminated not later than five years after its imposition, unless a duly substantiated review demonstrates that the expiry of the duty would be likely to lead to continuation or recurrence of dumping and/or injury.</i></p> <p><i>In the present case, the GOI respectfully submits that such a likelihood has not been demonstrated.....</i></p>	<p>the review period; rather, it requires an assessment of whether dumping and injury are likely to continue or recur if the duties expire.</p> <p>The Commission also concluded that there is no likelihood of recurrence of dumping if anti-dumping duties on Exporting Countries are removed.</p>
<p>4. Positive development of the petitioner.</p> <p><i>The GOI observes that nearly eight years of anti-dumping measures have afforded the petitioner ample time to recover and strengthen its position. According to subsection 4.1 of the Petition, the domestic industry has achieved notable improvements, including increased production capacity, higher output and market share, profitability, and export capability. The Petition further acknowledges the industry's current healthy condition, suggesting that continued protection may no longer be warranted.</i></p>	<p>The Commission conclude that termination of anti-dumping duty imposed on dumped imports of the product under review from the Exporting Countries will not be likely increase in volume of dumped imports, thus there is no likelihood of recurrence of injury to the domestic industry on accounts of price suppression, decline in domestic industry's production, capacity utilization, sales, market share and adverse effect on profits, inventories, return on investment (ROI), employment and productivity of the domestic industry. (paragraph 24 supra).</p>
<p>5. Other Contributing Factors to Material Injury</p> <p>5a) Unrecorded smuggling activity. <i>The Petition highlights that unrecorded smuggling, primarily from Iran, remains a significant concern. The unrecorded smuggling undermines the effectiveness of anti-dumping measures and distorts the domestic market.....</i></p> <p>5b) Corporate Restructuring. <i>Based on the information presented in the Petition, the GOI has become aware of a re-merger undertaken by one of the applicants, which may have had a financial impact on the company concerned.</i></p>	<p>Possibility of unrecorded smuggling, if any, does not negate the likelihood of continuation or recurrence of dumping from the subject countries.</p> <p>Such internal business adjustments fall outside the scope of a sunset review investigation. The objective of a sunset review is to assess whether the expiry of the anti-dumping duties would be likely to result in the continuation or recurrence of dumping and the associated injury.</p>

5c) Price undercutting caused by dumped imports from Iran. <i>Based on the information presented in the Petition, during the final year of the review period (January-December 2024), the landed cost of these imports-even with duties-was below the domestic ex-factory price, resulting in both absolute and percentage-based undercutting.</i>	Refer to Paragraph 23.4.2 of the report for analysis and conclusion of Commission on price undercutting.

Annex-II

Comments of Interested Parties	NTC View
Views and Comments from Directorate General of Foreign Trade, Ministry of Trade of the Republic of Indonesia. on (SEF)	
1. No Export from Indonesia During the Period of Review. <i>As demonstrated in Table V of the SEF, there were no imports from Indonesia during the period of review (POR). Imports were recorded only in 2023 - 2024 and were sourced from Iran and other countries.....</i>	Although dumped imports of Sulphonic Acid from the Exporting Countries decreased after imposition of anti-dumping duties, however, in case anti-dumping duties imposed on the dumped imports of Sulphonic Acid from the Exporting Countries are terminated there is no likelihood of recurrence of dumping into Pakistan as the landed cost of Sulphonic Acid imported from Exporting Countries without anti-dumping duties will be higher than the domestic industry prices of the Sulphonic Acid. (Refer para 22.1.3 of the report)
2. No Causal Link between Imports from Indonesia and Any Injury Suffered by the Domestic Industries. <i>As set out in Table VII of the SEF, the landed cost of these imports, both with and without ADD, consistently remained at or above the domestic product's price and, in several years, even exceeded the domestic cost to make and sell. As a result, there is no evidence of price undercutting, price depression, or price suppression attributable to imports. The sharp increase in domestic production costs is a more credible explanation for the economic pressure the industry has experienced.</i> <i>Consistent with Article 3.5 of the WTO Anti-Dumping Agreement, the absence of any price effects and the non-existence of imports from Indonesia during the POR clearly demonstrate that no causal link can be established between imports from the subject country and the state of the domestic industry.</i>	The Commission reiterates that Article 11.3 of the WTO Anti-Dumping Agreement does not require evidence of dumping during the review period; rather, it requires an assessment of whether dumping and injury are likely to continue or recur if the duties expire. The Commission also concluded that there is no likelihood of recurrence of dumping if anti-dumping duties on Exporting Countries are removed.
The Injury Suffered by the Domestic Industry Is Not Attributable to Imports from Indonesia.	The Commission conclude that termination of anti-dumping duty imposed on dumped imports of the product under review from

<p><i>Based on Table VIII of the SEF, despite the imposition of an anti-dumping duty, domestic sales have continued to decline from 2022 to 2024.....</i></p> <p><i>In addition, since the last year of the original investigation, the domestic industry's capacity utilisation has shown a downward trend. This development coincides with the large-scale expansion undertaken by the domestic industry.....</i></p> <p><i>As shown in Table X of the SEF, although the domestic industry experienced a temporary loss in 2022, profitability has since returned and remained positive.....</i></p> <p><i>As presented in para 18.8 of the SEF, employment levels have increased significantly, resulting in higher salary expenditures.....</i></p>	<p>the Exporting Countries will not be likely increase in volume of dumped imports, thus there is no likelihood of recurrence of injury to the domestic industry on accounts of price suppression, decline in domestic industry's production, capacity utilization, sales, market share and adverse effect on profits, inventories, return on investment (ROI), employment and productivity of the domestic industry. (paragraph 24 supra).</p>
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Views and Comments from Applicants. on (SEF)	
<p>Whether exporters/producers from Exporting Countries stopped or continued exporting the product under review to Pakistan after imposition of Anti-Dumping Duty.</p> <p><i>The evidence in Table-V shows that except Iran, exporters from all other countries stopped shipments to Pakistan immediately after the anti-dumping duties were imposed. This behaviour aligns with the consistent pattern observed in prior cases: exporters remain active only when they can dump and exit once the price advantage is removed.</i></p>	<p>Refer to paragraph 22.1 of the report for analysis and view of the Commission on this factor.</p>
<p>Likelihood of dumping and calculation of likely dumping margins for exporters/ foreign producers.</p> <p><i>In paragraph 17.3.5, the SEF states that no likely dumping margins will be calculated due to the unavailability of reliable export price data from the exporting countries. This lack of data results from the non-cooperation of the exporters. The Schedule to the Act on Best Information Available permits the Commission to rely on secondary information submitted by the Applicant for the purpose of its assessment.....</i></p>	<p>As stated in paragraph 22.2 the Applicants submitted the export prices from the Exporting Countries based on their exports to a third country. These prices were sourced from an online platform, Volza, which provides global import/export data for various products. However, the quantities used to calculate these export prices were even lower than the exports from Iran to Pakistan during the POR. Consequently, these export prices cannot be utilized for the calculation of the export price.</p> <p>The Commission has also explored the other sources including Trademap.org for the determination of export prices for the Exporting countries. However, the data available on trademap.org is at 6 digit level which also includes other products. Therefore, this data cannot be utilized for determination of export price.</p>