Government of Pakistan
National Tariff Commission

Final Determination

of

Anti- Circumvention Investigation of Anti-Dumping Duties Levied on Dumped Imports of Cold Rolled Steel Coils/Sheets Originating in and/or Exported From the People's Republic of China

35/2025/NTC/CRC/CV
February 16, 2026

A. Governing Law

National Tariff Commission (the "Commission") having regard to the Anti-Dumping Duties Act, 2015 (the "Act"), the Anti-Dumping Duties Rules, 2022 (the "Rules"), and the WTO's Agreement on Implementation of Article VI of the General Agreement on Tariffs and Trade 1994 (the "Anti-dumping Agreement").

2. Section 63 of the Act and Chapter V of the Rules lay down the definition of circumvention, procedure for investigation and determination of circumvention, injury to the domestic industry or remedial effects of duty being undermined. Upon determination of circumvention, the Act provides for extension of anti-dumping duties to imports from third countries of the like product, whether slightly modified or not, or to imports of the slightly modified like product from the country subject to measures, or parts thereof etc. Sub-sections 1 and 2 of Section 63 of the Act lay down conditions and requirements for anti-circumvention investigation as follows:

"63(1). Antidumping duties imposed pursuant to this Act may be extended to imports from third countries, of the like product, whether slightly modified or not, or to imports of the slightly modified like product from the country subject to measures, or parts thereof, when circumvention of the measures in force is taking place. Antidumping duties not exceeding the residual antidumping duty imposed in accordance with section 39 may be extended to imports from companies benefiting from individual duties in the countries subject to measures when circumvention of the measures in force is taking place. Circumvention shall be defined as a change in the pattern of trade between third countries and Pakistan or between individual companies in the country subject to measures by Pakistan, which stems from a practice, process or work for which there is insufficient due cause or economic justification other than the imposition of the duty, and where there is evidence of injury or that the remedial effects of the duty are being undermined in terms of the prices or quantities of the like product, and where there is evidence of dumping in relation to the normal values previously established for the like product, if necessary in accordance with the provisions of this Act."

"63(2) The practice, process or work referred to in subsection (1) includes, inter alia, the slight modification of the product concerned to make it fall under customs tariff which are normally not subject to the measures, provided that the modification does not alter its essential characteristics, the consignment of the product subject to measures via third countries, the reorganization by exporters or producers of their patterns and channels of sales in the country subject to measures in order to eventually have their products exported to Pakistan through producers benefiting from an individual duty rate lower than that applicable to the products of the manufacturers, and, in the circumstances indicated in subsection (3), the assembly of parts by an assembly operation in Pakistan or a third country".

3. The Commission has conducted an anti-circumvention investigation against dumped imports of Cold Rolled Steel Coils /Sheets of a thickness ranging from 0.15 mm to 3.00 mm and a width above 1250mm (CR Coils/Sheets) into Pakistan originating in and/or exported from the People's Republic of China ("China") under the Act and the Rules. The Commission has made final determination in this investigation under Section 63 of the Act. This report of final determination has been issued in accordance with Section 39 (5) of the Act, Rule 43 (2) of the Rules, and Article 12.2 of the Anti-Dumping Agreement.

B. Background

4. Definitive Anti-Dumping Duties in Place:

4.1 In the original investigation, the Commission imposed definitive anti-dumping duties ranging from 13.17 percent to 19.04 percent in *ad valorem* terms on dumped imports of CR Coils /Sheets of a thickness ranging from 0.15 mm to 3.00 mm and a width up to 1250mm imported from China and Ukraine for a period of five years, effective from January 13, 2016.

4.2 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 the domestic industry producing CR Coils /Sheets of a thickness ranging from 0.15 mm to 3.00 mm and a width up to 1250mm. While concluding the said Sunset Review, the Commission decided to terminate the anti-dumping duties imposed on imports of CR Coils /Sheets imported from Ukraine with immediate effect, as there was no likelihood of recurrence of dumped imports of CR Coils/Sheets of a thickness ranging from 0.15 mm to 3.00 mm and a width up to 1250mm from Ukraine. However, in the case of China, the Commission decided to continue definitive anti-dumping duties for another period of 5 years, with effect from January 13, 2021, imposed on dumped imports of the CR Coils/Sheets of a thickness ranging from 0.15 mm to 3.00 mm and a width up to 1250mm from China as per the rates given in Table-I below:

Table-I
Definitive Anti-Dumping Duty Rates

Country	Exporter / Producer Name	Anti-dumping Duty Rate (%)
China	Shougang Casey Steel Company Ltd.	19.04
	Shougang Jingtang United Iron & Steel Co. Ltd.	19.04
	Beijing Shougang Cold Rolling Company Ltd.	16.27
	Handan Iron & Steel Group Han-Bao Co. Ltd.	13.17
	Maanshan Iron & Steel Company Ltd.	19.04
	All other exporters/Foreign producers	19.04

4.3 In the said Sunset Review, the Commission slightly amended the scope of the product subject to the anti-dumping duties as follows:

"flat-rolled products of iron or non-alloy steel of a thickness ranging from 0.15 mm to 3.00 mm and a width up to 1250mm, cold- rolled (cold- reduced), not clad, plated or coated, of prime and secondary quality ("CR Coils/Sheets"), of in rolls or slit to length sheets, excluding CR Coils/ Sheets used in automotive outer skins of four wheeler vehicles of following auto grades and Tin Mill Black Plate (TMBP) imported from the Exporting Countries (the product under Review):

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

The investigated product is classified under Pakistan Customs Tariff Heading Nos. 7209.1510, 7209.1590, 7209.1610, 7209.1690, 7209.1710, 7209.1790, 7209.1810, 7209.1899, 7209.2510, 7209.2590, 7209.2610, 7209.2690, 7209.2710, 7209.2790, 7209.2810 and 7209.2890"

4.4 On request of the domestic industry, the Commission also initiated the second sunset review of anti-dumping duties imposed on dumped imports of CR Coils/ Sheets of a thickness ranging from 0.15 mm to 3.00 mm and a width up to 1250mm from China on January 10, 2026, which is under progress.

4.5 The Commission also conducted another anti-dumping investigation on the dumped imports of Cold Rolled Coils/Sheets of a thickness ranging from 0.15 mm to 3.00 mm and a width up to 1250mm into Pakistan originating in and/or exported from Canada and Russian Federation and has imposed definitive anti-dumping duty at the rate of 13.94 percent with effect from September 20 2019. Furthermore, following a Sunset Review, the anti-dumping duties imposed on dumped imports of CR Coils/Sheets of a thickness ranging from 0.15 mm to 3.00 mm and a width up to 1250mm from Canada and Russia have been extended for an additional five years, with effect from September 20, 2024.

4.6 On request of the domestic industry, the Commission also conducted an anti-dumping investigation against dumped imports of CR Coils /Sheets of a thickness ranging from 0.15 mm to 3.00 mm and a width up to 1250mm from European Union, South Korea, Chinese Taipei and Vietnam. While finalizing this investigation, the Commission decided to impose the definitive anti-dumping duties on dumped imports of CR Coils /Sheets of a thickness ranging from 0.15 mm to 3.00 mm and a width up to 1250mm from the above-mentioned countries for a period of five years, effective from August 23, 2021, as per the rates given in Table-II below:

Table-II
Anti-dumping Duty Rates

Country Name	Duty Rate (% of C&F price)
Chinese Taipei	6.18
European Union	6.50
South Korea	13.24
Vietnam	17.25

C. Procedure

5. Receipt of Application

5.1 The Commission received an application under Section 63 of the Act and Rule 23 & 25 of the Rules on March 27, 2025, from two of the interested parties i.e. M/s. International Steels Limited, Karachi and M/s Aisha Steel Mills Limited, Karachi (the "Applicants"). The Applicants are engaged in manufacturing and selling CR Coils/Sheets of a thickness ranging from 0.15 mm to 3.00 mm and a width up to 1250mm. The Applicants are producer of flat-rolled products of iron or non-alloy steel of a thickness ranging from 0.15 mm to 3.00 mm and a width up to 1250 mm, cold- rolled (cold- reduced), not clad, plated or coated, of prime and secondary quality of in rolls or slit to length sheets and have alleged that Chinese exporters are circumventing the anti-dumping duties through product modification, due to which the domestic industry is not realizing the benefits of imposition of anti-dumping duties and is suffering injury.

5.2 Section 63(4) of the Act provides that, "*Investigations shall be initiated pursuant to this section on the initiative of the Commission or at the request of any interested party ………*" Similarly, Rule 23 of the Rules states that, *"The Commission may initiate an anti-circumvention investigation on receipt of an application from any interested party…………….*"

5.3 The Commission informed the Diplomatic Mission of China in Islamabad through a note verbal dated April 11, 2025, of the receipt of the application in accordance with the requirements of Section 21 of the Act and Rule 24 of the Rules.

6. Evaluation and Examination of the Application

Examination of the application showed that it met the requirements of Section 63 of the Act as it contained sufficient evidence of circumvention of anti-dumping duties imposed on dumped imports of CR Coils/Sheets of a thickness ranging from 0.15 mm to 3.00 mm and a width above 1250mm into Pakistan from China, and causing injury to Pakistan's domestic industry producing CR Coils /Sheets. Requirements of Rules 23, 25, and 26 of the Rules, which relate to the submission of information/data prescribed therein, were also found to have been met.

7. Domestic Manufacturers of CR Coils /Sheets:

7.1 According to the information provided in the application and the information available with the Commission, the domestic manufacturers producing CR Coils/Sheets of a thickness ranging from 0.15 mm to 3.00 mm and a width up to 1250mm consist of the following five units;

- i. Aisha Steel Mills Limited ("ASL"), Karachi;
- ii. International Steel Limited ("ISL"), Karachi;
- iii. AHN Steel Pvt. Limited, Lahore;
- iv. Hadeed Pakistan Pvt. Limited, Lahore;
- v. MAB Steel Industries Pvt. Limited, Rawalpindi, and

7.2 Following table shows unit-wise installed capacity of the domestic manufacturers producing CR Coils/Sheets CR Coils /Sheets of a thickness ranging from 0.15 mm to 3.00 mm and a width up to 1250mm:

Table-III
Unit-wise Current Installed Production Capacity (MT)

S. No.	Unit Name	Capacity
i.	Aisha Steel Mills Limited	700,000
ii.	International Steel Limited	1,000,000
iii.	AHN Steel Limited	50,000
iv.	Hadeed Pakistan Pvt. Limited	300,000
v.	MAB Steel Industries Pvt. Limited	200,000
Total		2,250,000

Sources: the Applicants and AHN Steel Pvt. Ltd.

7.3 The total installed production capacity of these five units is 2,250,000 MT per annum. Further, both the Applicants also used CR Coils /Sheets CR Coils /Sheets of a thickness ranging from 0.15 mm to 3.00 mm and a width up to 1250mm inhouse for production of Galvanized and Colored Coils/ sheets. Their installed capacity for Galvanized and Colored Coils/ Sheets is 796,000

MT per annum, therefore, domestic industry's current operational installed capacity for production and sale of CR Coils/Sheets in the market is 1,454,000 MT.

8. Initiation of Investigation

8.1 The Commission examined the accuracy and adequacy of the evidence and information/data provided in the application in accordance with Section 63 of the Act and Rule 26 of the Rules. It was determined that there was sufficient evidence of circumvention of anti-dumping duties imposed on CR Coils/Sheets of a thickness ranging from 0.15 mm to 3.00 mm and a width up to 1250mm through the slight modification of the product by declaring it as CR Coils/Sheets above 1250 mm width into Pakistan from China. Therefore, the Commission decided to initiate this anti-circumvention investigation in this case on May 23, 2025.

8.2 The Commission issued a notice of initiation of anti-circumvention investigation in accordance with Section 27 of the Act, which was published in the Official Gazette of Pakistan and in two widely circulated national newspapers (Business Recorder and Roznama Dunya) on May 23, 2025.

8.3 In pursuance of Rule 27(a) of the Rules, the Commission notified Diplomatic Mission of China in Islamabad of initiation of this anti-circumvention investigation (by sending a copy of the notice of initiation) on May 26, 2025, with a request to forward it to all exporters/ producers involved in production, sales and exports of CR Coils/Sheets in China. A copy of the notice of initiation was also sent directly to Chinese exporters/ producers whose addresses were available with the Commission, including Pakistani importers, and the Applicant on May 26, 2025.

8.4 In pursuance of Rule 27(3) of the Rules, the Commission on May 26, 2025, sent copies of full text of the written application (non-confidential version) along with Exporter's Questionnaire to the Diplomatic Mission of China in Islamabad with a request to forward it to their respective exporters/ producers involved in production, sale and/or export of CR Coils/Sheets.

9. Period of Investigation

The period of investigation for this anti-circumvention investigation is from January 01, 2021, to December 31, 2024, to determine whether circumvention has undermined the remedial effects of the anti-dumping duties. Whereas the redetermined product scope took its effect on January 7, 2022.

10. Product Under Consideration (Subject to anti-dumping duty) and Product under Investigation (Slightly Modified Product)

10.1 Product Under Consideration (PUC):

10.1.1 As per notice of conclusion of the sunset review, the product under consideration ("PUC") which is subject to anti-dumping duty is flat-rolled products of iron or non-alloy steel of a thickness ranging from 0.15 mm to 3.00 mm and a width up to 1250 mm, cold- rolled (cold-reduced), not clad, plated or coated, of prime and secondary quality ("CR Coils/Sheets"), in rolls or slit to length sheets, excluding Tin Mill Black Plate (TMBP) and CR Coils/ Sheets used in automotive outer skins of four wheeler vehicles of auto grades imported from China as specified below:

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

10.1.2 The PUC is classified under Pakistan Customs Tariff Heading Nos. 7209.1510, 7209.1590, 7209.1610, 7209.1690, 7209.1710, 7209.1790, 7209.1810, 7209.1899, 7209.2510, 7209.2590, 7209.2610, 7209.2690, 7209.2710, 7209.2790, 7209.2810 and 7209.2890. It is mainly used in production of automotive parts, sub-assembly/inner body parts, fabrication of goods like doors/cabinets, pipes, tubes, refrigerators, washing machines, geysers, ovens, etc.

10.1.3 The outcome of the second sunset review of anti-dumping duties imposed on dumped imports of CR Coils/Sheets from China, being carried out by the Commission, shall have bearing on the scope of the product under consideration in this anti-circumvention investigation.

10.1.4 Following is the customs tariff (2024-25) structure of Cold Rolled coils/sheets :

Table – IV
Tariff Structure of Cold Rolled Coils/Sheets

PCT Heading	Description	Customs + Add. Duty	RD	FTAs/PTAs	Concession under SROs
Chapter 72	Iron and Steel				
72.09	Flat- rolled products of iron or non- alloy steel, of a width of 600mm or more, cold-rolled (cold-reduced), not clad, plated or coated.				
	- In coils, not further worked than cold-rolled (cold-reduced)				
	- - Of a thickness of 3mm or more				
7209.1510	- - - Of secondary quality	20+6	10% till Mar.25 5% w.e.f. Apr.25	CN_24=5.33; CN_25=2.67; MY=10; SAFTA=5; LK_FTA Conc. = 100%;	---
7209.1590	- - - Others	11+2	10% till Mar.25 5% w.e.f. Apr.25	CN_5; MY=10; SAFTA=5; LK_FTA Conc. = 100%	---
7209.1610	- - - Of secondary quality	20+6	10% till Mar.25 5% w.e.f. Apr.25	CN_12.8; MY=10; SAFTA=5; LK_FTA Conc. = 100%	---
7209.1690	- - - Others	11+2	10% till Mar.25 5% w.e.f. Apr.25	CN_5; MY=10; SAFTA=5; LK_FTA Conc. = 100%	---
	- - Of a thickness of 0.5mm or more but not exceeding 1mm				
7209.1710	- - - Of secondary quality	20+6	10% till Mar.25 5% w.e.f. Apr.25	CN_12.8; MY=10; SAFTA=5; LK_FTA Conc. = 100%	---
7209.1790	- - - Other	11+2	10% till Mar.25 5% w.e.f. Apr.25	CN_5; MY=10; SAFTA=5; LK_FTA Conc. = 100%	---
	- - Of a thickness of less than 0.5mm				
7209.1810	- - - Of secondary quality	20+6	10% till Mar.25 5% w.e.f. Apr.25	CN_12.8; MY=10; SAFTA=5; LK_FTA Conc. = 100%	---

7209.1899	- - - Other	11+2	10% till Mar.25 5% w.e.f. Apr.25	CN_5; MY=10; SAFTA=5; LK_FTA Conc. = 100%	---
	- Not in coils, not further worked than cold- rolled (cold- reduced):				
	- - Of a thickness of 3 mm or more :				
7209.2510	- - - Of secondary quality	20+6	10% till Mar.25 5% w.e.f. Apr.25	CN_24=5.33; CN_25=2.67; MY=10; SAFTA=5; LK_FTA Conc. = 100%;	---
7209.2590	- - - Other	11+2	10% till Mar.25 5% w.e.f. Apr.25	CN_5; MY=10; LK_FTA Conc. = 100%	---
	- Not in coils, not further worked than cold- rolled (cold-reduced)				
	- - Of a thickness exceeding 1mm but less than 3mm				
7209.2610	- - - Of secondary quality	20+6	10% till Mar.25 5% w.e.f. Apr.25	CN_24=13.33; CN_25=12; MY=10; LK_FTA Conc. = 100%;	---
7209.2690	- - - Other	11+2	10% till Mar.25 5% w.e.f. Apr.25	CN_5; MY=10; LK_FTA Conc. = 100%	---
	- - Of a thickness exceeding 0.5mm but not exceeding 1mm				
7209.2710	- - - Of secondary quality	20+6	10% till Mar.25 5% w.e.f. Apr.25	CN_24=13.33; CN_25=12; MY=10; LK_FTA Conc. = 100%;	---
7209.2790	- - - Other	11+2	10% till Mar.25 5% w.e.f. Apr.25	CN_5; MY=10; LK_FTA Conc. = 100%	---
	- - Of a thickness of less than 0.5 mm				
7209.2810	- - - Of secondary quality	20+6	10% till Mar.25 5% w.e.f. Apr.25	CN_24=13.33; CN_25=12; MY=10; SAFTA=5; LK_FTA Conc. = 100%;	---

7209.2890	- - - Other	11+2	10% till Mar.25 5% w.e.f. Apr.25	CN_5; MY=10; SAFTA=5; LK_FTA Conc. = 100%	---

Source: Pakistan Customs Tariff 2024-25. In Budget 2025-26, CD 11% is reduced to 10% and, ACD 6% is reduced to 4%, and ACD 2% is reduced to 0%.
Note: In 2021, 2022, and 2023, the CD for prime quality is 11%, with 2% ACD, and the CD for secondary quality is 20%, with 7% ACD.

10.2 <u>Product under Investigation ("PUI") or Slightly Modified Product</u>

10.2.1 The Product under Investigation ("PUI") or Slightly Modified Product alleged to be circumventing the anti-dumping duties is CR Coils /Sheets of a thickness ranging from 0.15 mm to 3.00 mm and a width up to 1250mm having width above 1250 mm. The PUI is classified under the same Pakistan Customs Tariff Heading Nos. as the PUC. PUI is also mainly used in production of automotive parts, sub-assembly/inner body parts, fabrication of goods like doors/cabinets, pipes, tubes, refrigerators, washing machines, geysers, ovens, etc.

10.2.2 According to the information available to the Commission the difference between the PUC and the PUI lies in their width. The PUC has a width of up to 1250 mm, whereas the PUI has a width above 1250 mm. The fundamental characteristics of the PUC and the PUI, including composition, mechanical properties, and the intended applications, are the same, as both can be slit to size as per customer requirements.

10.2.3 Slitting is a common industrial process used to cut wider coils into narrower strips without altering their physical, chemical, or mechanical properties. This means that after slitting, the PUI can serve the same purpose as the PUC.

11. <u>Information/data Gathering</u>

11.1 The Commission sent questionnaires to all known exporters/producers of CR Coils/Sheets in China on May 26, 2025, with the request to respond within 37 days of the dispatch of questionnaires. None of the exporters/producers of CR Coils/Sheets from China responded to the questionnaire and provided requisite information/data.

11.2 The Commission sent questionnaires to all known importers of CR Coils/Sheets from China and slitters of CR Coils/Sheets on May 26, 2025, with the request to respond within 37 days of the dispatch of questionnaires. Reminders were sent on July 04, 2025. Only the Pak Pipe Industries Pvt. Ltd. and SS Coil Center (SMC Pvt.) Ltd. has provided data/information on questionnaires.

11.3 The Commission has used import data obtained from source namely; Web Based One Customs (WEBOC) which is a web-based system developed by Pakistan Customs.

11.4 Thus, the Commission has sought all the relevant information/data deemed necessary for the purpose of this anti-circumvention investigation of anti-dumping duties levied on dumped imports of CR Coils/Sheets and injury to the domestic industry. In terms of Rule 11(I) of the Rules, the Commission confirmed the accuracy of the information provided by interested parties during this anti-circumvention investigation.

12. Verification of the Information/data

In terms of Rule 29 of the Rules, the Commission, during the course of the investigation shall verify information/data supplied by the interested parties. In order to verify the information/data provided by the Applicants, the investigation team used the data/information of CR Coils/Sheets, already verified during the on-the-spot verifications in its other investigations pertaining to the same Applicants, and covers the majority of POI.

13. Views, Comments and Hearing/Meeting

13.1 All interested parties known to the Commission were invited, through the Notice of Initiation, for their views /comments and to submit information/data and documents (if any) with regard to this anti-circumvention investigation. Some of the interested parties, i.e Iftikhar Steel House Pvt. Ltd, M.R.F Auto industry Pvt. Ltd, New Asia Auto Mobile Pvt. Ltd. Pak Pipe Industries Pvt. Ltd. and SS Coil Center (SMC Pvt.) Ltd. etc. submitted their views and comments, which are reported along with the Commission's response at Annex-I of this report.

13.2 The following are the substantive points from the submissions of interested parties made after the initiation of this investigation:

From Importers/Users/Pipe Industry	From Slitters	From Applicants.
(i). PUC and PUI are distinct products and are not interchangeable;	(i). The applications and industry of PUC and PUI are same.	(i). PUC and PUI are fully interchangeable and usage are same.
(ii). Domestic Industry does not produce CR Coils/ Sheets of width above 1250 mm;	(ii). Local mills are not providing all kinds of CR Coils.	(ii). The productions process of PUC and PUI is identical regardless of width, encompassing hot rolling, pickling, cold rolling, annealing and finishing.
(iii). Usage of CR Coils/Sheets above 1250 mm especially in pipe manufacturing industry, enables enhanced material efficiency, reduced edge waste, and greater operational flexibility, which is not possible with narrower coils.	(iii). There is no difference in quality, utility or mechanical properties between PUC and PUI.	(iii). PUC and PUI are identical in all materials respects, including chemical composition, mechanical strength, surface finish, thickness tolerance and cold rolling characteristics.

13.3 In terms of Rule 14 of the Rules, the interested parties were required to request for hearing in this review within 45 days of the publication of the notice of initiation. The Commission did not receive any request for hearing. Therefore, no hearing was held in this review.

13.4 The Commission has reviewed all information/data, evidence, views and comments raised/submitted by the interested parties during the course of this anti-circumvention investigation and has reached on these essential facts after consideration of the same.

14. Disclosure of Essential Facts

14.1 In terms of Rules 15 of the Rules, and Article 6.9 of the Anti-Dumping Agreement, the Commission disclosed essential facts to the interested parties in this anti-circumvention investigation. In this context a Statement of Essential Facts ("SEF") was also dispatched on December 31, 2026, to all interested parties including the known exporters/ foreign producers, the Applicants, Known slitters of CR Coils/Sheets, known domestic producers of CR Coils/Sheets, known Pakistani importers, and to the Diplomatic Mission of China in Islamabad.

14.2 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, only the Pak Pipe Industries Pvt. Ltd. submitted comments on SEF. Comments were received within prescribed time. Views/comments and information submitted by the above-mentioned interested parties have been considered in making conclusion on this investigation. Views/Comments of the interested parties germane to this review investigation and response of the Commission are provided at Annexure-II of this report.

15. Confidentiality

15.1 In terms of Section 31 of the Act, the Commission shall keep confidential any information/data 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 the interested parties upon good cause shown to be kept confidential.

15.2 The Applicants have requested to keep confidential the information/data, which is by nature confidential in terms of Section 31 of the Act. This information/data includes data relating to sales, sale prices, cost to make and sell, inventories, production, profit/(loss), return on investment, investment, salaries & wages, number of employees etc. In addition to this, the Applicants have also provided certain other information/data on a confidential basis under Section 31(2)(c), as such information/data, e.g. export or import price and import volume etc., the disclosure of which may lead to reverse calculations of confidential information/data. However, they have submitted non-confidential summaries of the confidential information/data in accordance with Section 31(5) of the Act. Non-confidential summaries permit a reasonable understanding of the information/data submitted in confidence.

15.3 Pursuant to requests made by the interested parties to treat certain information/data as confidential, the Commission has determined the confidentiality in light of Section 31 of the Act, and for the reasons that disclosure of such information/data may be of significant competitive advantage to its competitors, or because its disclosure would have a significant adverse effect upon the interested parties providing such information/data. However, in terms of Sub-Section (5) of Section 31, non-confidential summaries of all confidential information/data, which provide reasonable understanding of the substance, have been placed in non-confidential public file.

16. Public File

The Commission, in accordance with Rule 7 of the Rules, has established and maintained a public file in this anti-circumvention investigation at its office. This file remains available to the interested parties for review and copying from Monday to Thursday between 11:00 hours to 13:00 hours throughout the anti-circumvention investigation. This file contains non-confidential versions of the application, submissions, notices, correspondence and other documents for disclosure to the interested parties.

D. Determination of Circumvention

17. Parameters for Determination of Circumvention:

The Act and the Rules provide that the Commission will analyze all available and known factors to determine whether circumvention has occurred. These factors may include, but are not limited to, assessment of slight modification, change in trade pattern, and remedial effects of anti-dumping duties that are being undermined as follows:

17.1 Determination of Slight Modification of the Product Concerned:

17.1.1 **General and Physical Characteristics of the Products**

The PUC and the PUI share a similar composition, exhibit the same essential characteristics, and serve identical purposes. The major raw material, i.e., HR coils, is the same in the composition of PUC and PUI. The major properties of both products, such as surface finishing, durability, strength, etc., are similar. Further, the industrial usage of PUC and PUI is also alike.

17.1.2 **Products Similarity and End Use**

17.1.2.1 The PUC and the PUI imported from China retain identical characteristics, applications, and end-use functionalities as domestically produced CR Coils/sheets. The PUC and PUI have same raw material composition (steel), manufacturing process and functional attributes. Both widths are produced using the same machinery, follow the same production techniques, and cater to identical industries. This underscores that the surge in imports of the PUC is not driven by product differentiation or a shift in industrial demand but rather serves as a mechanism to undermine the remedial effect of anti-dumping duties on PUI.

17.1.2.2 The user industry remains the same for the PUC and PUI, as both are subject to slitting process according to the specific requirements of end-users.

17.1.3. **Interchangeability of Both Products**

The differentiating factor between PUC and PUI lies is their width which can be eliminated through slitting, and the fact that both products serve identical industries with no fundamental difference in composition or quality, it is evident that the PUI is a complete substitute of the PUC.

As far as the process of slitting is concerned, it is not exclusive to the PUI as this is commonly used process to obtain cut-to-size pieces or PUC/PUI for use as per the requirements.

17.1.4 **Production Process of Products**

17.1.4.1 The production process of CR coils/sheets consists of the following steps:

i. De coiling of Hot Rolled ("HR") Coils;
ii. Straightening of HR Coils;
iii. Pickling and Chemical treatment of HR Coils;
iv. Cold Rolling;
v. Electrolytic Cleaning Line;
vi. Annealing;
vii. Skin pass;
viii. Tension Leveling with electrostatic oiling;
ix. Coiling/cutting/stripping; and
x. Packing

17.1.4.2 The main raw material used in the production of CR coils/sheets is HR coils and chemicals. HR coils are imported and are converted into the final product i.e. CR coils/sheets. Before processing into cold rolled steel, it is necessary to pickle the HR coils to eliminate the black oxide scale on the surface. Subsequent to which, the hot rolled coil is rolled into thinner gauges at room temperature to the required thickness through passage in rolling stands. Cold rolled steel possesses a better surface, enhanced strength, and better dimensional characteristics than hot rolled steel. After cold reducing, the product passes through an electrolytic cleaning line for removal of oil, iron powder and other materials. The CR steel is then annealed, which involves slow heating and cooling to improve workability. Skin Passing is done to improve and normalize the mechanical properties and to get the specified surface finish, hardness and flatness.

17.1.4.3 The production process for both PUC and the PUI is identical, the only difference to convert PUC into PUI is using HR Coils of higher width i.e. greater than 1250 mm.

17.1.5 **Cost of Modification / Value Addition**

According to the information available to the Commission, cost of modification of PUC to PUI involves only slitting. The slitting operations involve minimal transformation, with a value addition of only 2% to 3%. The wider coils slit into standard sizes at a minimal additional cost of Rs. 3,000 to Rs. 5,000 per MT. However, this slitting is not unique only to PUI as cut-to-size pieces can also be required by the users of PUC attracting slitting costs.

17.2 Change in Trade Pattern between Product Subject to Measure and Slightly Modified:

i) Trade Pattern of Products

17.2.1 The import data obtained from WEBOC shows that there is a notable shift in the trade pattern from PUC (product subject to anti-dumping duties) to PUI (slightly modified product) to circumvent the anti-dumping duties levied without any justifiable basis. Such changes in trade patterns undermined the remedial effects of the imposition of anti-dumping duty. The following table shows the trade pattern of both the products, i.e., PUC and PUI, from China and other sources since the imposition of the anti-dumping duties.

Table – V
Trade Pattern of the PUC and the PUI

*Year/Period	PUC (CRC up to 1250 mm)			PUI (CRC above 1250 mm)		
	China	Other Countries	Total	China	Other Countries	Total
(1)	(2)	(3)	(4)	(5)	(6)	(7)
2021	6.4	93.6	100.0	-	4.1	4.1
2022	9.2	39.6	48.8	1.8	1.3	3.2
2023	6.1	19.2	25.3	23.0	0.1	23.1
2024	8.1	14.5	22.6	51.0	0.2	51.2

* Year is from January to December
Source: the Applicants and FBR/WEBOC
Note: To maintain confidentiality, actual figures have been indexed to the PUC total for 2021, with the latter set to 100.

17.2.2 Anti-dumping duties on dumped imports of PUC from China were initially imposed with effect from January 13, 2016 (paragraph 4 supra), which were extended for another period of 5 years with effect from January 13, 2021, by a Sunset Review. In the said Sunset Review, the Commission slightly amended the scope of the PUC and excluded the PUI, i.e., CRC with a width above 1250 mm, from its scope. The notice of said Sunset Review was published on January 7, 2022. The above table shows that the product under investigation started increasing after such exclusion, i.e., from the year 2022.

17.2.3 The above table shows that, in the year 2021, the imports of PUI from China were zero. However, this changed significantly after the year 2022, the year the anti-dumping duties were imposed on CRC up to 1250 mm. That year, imports of CRC above 1250 mm from China started increasing. But in 2023 and 2024, they surged exponentially. Imports of PUI from China increased to more than 99 percent of total imports of PUI. On the other hand, PUI from other countries declined during this period. This sharp upward trajectory of PUI contrasts starkly with the declining trend in imports of CRC up to 1250 mm (PUC).

17.2.4 Above change in the trade pattern suggests that the domestic market had limited demand for wider coils or that the primary consumption was in the narrower segment. However, starting in 2022, the imports of PUI began to rise notably from China. This increase in imports of PUI strongly indicates a shift in import strategy designed to avoid the anti-dumping duties.

17.2.5 On the basis of the above analysis, the Commission determines that there is a significant and visible change in trade pattern between the PUC and PUI from the country subject to the measure (China) in terms of provisions of Section 63 of the Act.

17.2.6 In addition to the above, the Commission has analyzed the trade pattern of importers of PUC and PUI in the table below:

Table – VI
Importer Wise Trade Pattern of PUC and PUI

(MT)

Importer	**Types**	**2021**	**2022**	**2023**	**2024**
(1)	**(2)**	**(3)**	**(4)**	**(5)**	**(6)**
Importer A	PUC (CR Coils/Sheets up to width 1250 mm)	2,980	2,005	-	-
	PUI (Slightly Modified Product)	-	-	8,935	20,673
Importer B	PUC (CR Coils/Sheets up to width 1250 mm)		2,837	1,918	5,853
	PUI (Slightly Modified Product)	-	-	-	5,177
Importer C	PUC (CR Coils/Sheets up to width 1250 mm)	-	-	466	-
	PUI (Slightly Modified Product)	-	-	2,125	4,840
Importer D	PUC (CR Coils/Sheets up to width 1250 mm)	-	-	-	476
	PUI (Slightly Modified Product)	-	-	1,811	4,199
Importer E	PUC (CR Coils/Sheets up to width 1250 mm)	1,190	2,068	1,342	277
	PUI (Slightly Modified Product)	-	-	573	2,531
Importer F	PUC (CR Coils/Sheets up to width 1250 mm)	-	-	-	-
	PUI (Slightly Modified Product)	-	-	276	1,540
Importer G	PUC (CR Coils/Sheets up to width 1250 mm)	-	-	-	-
	PUI (Slightly Modified Product)	-	-	-	1,132
Importer H	PUC (CR Coils/Sheets up to width 1250 mm)	-	-	-	-
	PUI (Slightly Modified Product)	-	-	759	1,049
Importer I	PUC (CR Coils/Sheets up to width 1250 mm)	-	-	-	128
	PUI (Slightly Modified Product)	-	-	-	1,922
Importer J	PUC (CR Coils/Sheets up to width 1250 mm)	-	-	464	277
	PUI (Slightly Modified Product)	-	-	-	971

Source: WEBOC Note: Information is based on leading importers of PUI during 2024
Note: In order to maintain confidentiality, names of importers are omitted.

17.2.7 The above table shows that after imposition of anti-dumping duties in 2022, the importers which were not importing PUI before 2022 begins to import PUI from China. Further, major importers of PUC shifted to imports of PUI from China. It is thus evident from the above table that there is a significant change in trade pattern between PUC and PUI from China in terms of provisions of Section 63 of the Act.

ii) <u>Trade Pattern of Exports by Chinese Exporters</u>

17.2.8 The Commission has also analyzed the trade pattern of exporters of PUC and PUI in the table below:

Table – VII
Exporter Wise Trade Pattern of PUC and PUI

(MT)

Importer	Types	2021	2022	2023	2024
(1)	(2)	(3)	(4)	(5)	(6)
Exporter A	PUC (CR Coils/Sheets up to width 1250 mm)	540	430	739	615
	PUI (Slightly Modified Product)	-	-	1,321	6,998
Exporter B	PUC (CR Coils/Sheets up to width 1250 mm)	3,733	966	317	3,964
	PUI (Slightly Modified Product)	-	802	4,428	22,488
Exporter C	PUC (CR Coils/Sheets up to width 1250 mm)	-	6,366	684	127
	PUI (Slightly Modified Product)	-	-	11,232	6,096
Exporter D	PUC (CR Coils/Sheets up to width 1250 mm)	-	39	1,213	401
	PUI (Slightly Modified Product)	-	-	-	5,133
Exporter E	PUC (CR Coils/Sheets up to width 1250 mm)	-	-	-	
	PUI (Slightly Modified Product)	-	-	-	3,553
Exporter F	PUC (CR Coils/Sheets up to width 1250 mm)	-	-	-	
	PUI (Slightly Modified Product)	-	-	1,266	2,014
Exporter G	PUC (CR Coils/Sheets up to width 1250 mm)	196	-	52	
	PUI (Slightly Modified Product)	-	-	379	1,945
Exporter H	PUC (CR Coils/Sheets up to width 1250 mm)	2,037	547	101	
	PUI (Slightly Modified Product)	-	-	-	1,629
Exporter I	PUC (CR Coils/Sheets up to width 1250 mm)	-	-	-	32
	PUI (Slightly Modified Product)	-	-	-	1,175
Exporter J	PUC (CR Coils/Sheets up to width 1250 mm)	-	-	-	1,180
	PUI (Slightly Modified Product)	-	-	-	1,025

Source: WEBOC Note: Information is based on leading exporters of PUI during 2024
Note: In order to maintain confidentiality, the names of exporters are omitted.

17.2.9 The above table shows that after imposition of anti-dumping duties in 2022, major importers of PUC shifted to imports of PUI from China. The exporters which were not importing

PUI before 2022 begins to import PUI from China after 2022. The Commission determined that there is a significant change in trade pattern between PUC and PUI from China in terms of provisions of Section 63 of the Act.

iii) <u>Price Trends of Products</u>

17.2.10 The following table shows the landed cost of the PUC, PUI, and domestic like product price since the imposition of the anti-dumping duties:

Table-VIII
Landed cost of PUC, PUI, and Price of Domestic Like Product

*Year/Period	Landed cost of:			Domestic like product's price
	PUC (up to 1250 mm)		*PUI (Above 1250 mm)	
	With ADD	Without ADD		
(1)	(2)	(3)	(4)	(5)
2021	98.7	84.6	-	100.0
2022	145.7	124.8	118.4	121.6
2023	150.5	129.0	122.3	147.1
2024	146.2	125.7	123.3	131.4

* Year is from January to December
Source: The Applicant and FBR
Note: For the purpose of the comparison, the landed cost of the PUI has been inflated by adding the estimated cost of slitting (Rs. 4000)
Note: To maintain confidentiality, actual figures have been indexed to the price of a domestic-like product in 2020, with 2020 set to 100.

17.2.11 The above table indicates that in the year 2022, when the anti-dumping duties were capped on CRC up to 1250 mm, i.e., PUC, the landed cost of PUC with anti-dumping duty was significantly higher than the Domestic like product's price. This price gap was providing a cushion for domestic producers, helping them remain competitive against unfairly priced imports. However, the landed cost of CRC above 1250 mm, i.e., PUI, was already below the domestic price.

17.2.12 This trend became more prominent in 2023, when the increase in the landed cost of PUI was less than the increase in the domestic price. Importers increasingly exploited this price differential by importing PUI from China at lower prices and slitting them into narrower widths that directly compete with domestic products. This practice allowed these imports to undercut domestic prices, leading to price suppression in the domestic market. Next, the landed cost of PUC with anti-dumping duty during 2023 is more than the landed cost of PUI during the same period.

17.2.13 By the year 2024, the landed cost of PUI had slightly increased, while the domestic price fell compared to the previous year. This decline in the prices of domestic like product is a clear indicator that the domestic industry has been forced to lower its prices in response to increasing volumes of PUI, which are cheaper and still cater to the same market demand due to post-import slitting. On the other hand, the landed cost of PUC with anti-dumping duty is higher than that of PUI.

17.2.14 The data in the above table demonstrates that although the anti-dumping duty was intended to restore fair competition and support local industry, the alleged circumvention through PUI has effectively nullified its impact. Imports from China have simply shifted to a near-identical, untaxed product, maintaining their presence in the domestic market at lower landed costs, and continuing to exert downward pressure on domestic prices.

17.2.15 Based on the above information and analysis, the Commission determined that circumvention of anti-dumping duties through a slightly modified product from the country subject to measures has undermined the remedial effects of the duty in terms of prices of the domestic like product.

17.3 Determination of Remedial Effects of the Anti-Dumping Duty Being Undermined in Terms of Prices and/or Quantities of the Like Product.

17.3.1 In terms of Section 63(1) of the Act Anti-dumping duties imposed on the investigated product may be extended to imports of the slightly modified like product from the country subject to measures, where there is evidence of injury or that the remedial effects of the duty are being undermined in terms of the prices or quantities of the domestic like product. Effects of the slightly modified like product on the quantities and prices of the domestic like product are analyzed in the following paragraphs.

i) Effects on Sales and Market Share

The following table shows information on sales and market share of the PUC and PUI of each segment of supply in the domestic market during the proposed POI.

Table – IX
Sales and Market Share

Year	Volume of Imports								Sales of Domestic Industry		Total Domestic Market
	PUC (CRC upto 1250 mm)				PUI (CRC Above 1250 mm)						
	China	%age	Other Countries	%age	China	%age	Other Countries	%age	Sales Volume	%age	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)
2021	1.51	1.51	22.11	22.11	-	-	0.98	0.98	75.39	75.39	100.00
2022	2.17	3.32	9.35	14.35	0.43	0.66	0.31	0.48	52.93	81.19	65.19
2023	1.44	3.12	4.54	9.85	5.44	11.81	0.01	0.03	34.64	75.19	46.07

2024	1.91	3.69	3.43	6.61	12.04	23.22	0.04	0.09	34.45	66.4	51.88

* Source: the Applicants and WEBOC
Year: January to December
Note: To maintain confidentiality, actual figures have been indexed relative to the total domestic market figures for 2020, with 2020 set to 100.

17.3.2 The above table shows that there were no imports of PUI in the year 2021 from China. In the year 2022, when anti-dumping duties were limited to CRC up to 1250 mm, the imports in that category held a combined share of 17.67% of the total domestic market (China: 3.32%, other countries: 14.35%). However, imports of CRC above 1250 mm were minimal, totaling just 1.14 % of the market (China: 0.66%, others: 0.48%). The share of the domestic industry in that year was 81.19% of the total domestic market.

17.3.3 The situation changed drastically in the year 2023. Imports of CRC above 1250 mm, i.e., PUI from China, surged, raising China's market share in this segment to 11.81%, and the domestic industry's share fell to 75.19%. By the year 2024, the market share of PUI increased to 23.22%. Meanwhile, imports of CRC up to 1250 mm continued to decline, further confirming that importers shifted toward wider coils as a workaround. At the same time, the domestic industry's share dropped to 66.40%. Notably, the market demand remained relatively stable between 2023 and 2024, suggesting that domestic producers were displaced directly by increasing volumes of PUI.

17.3.4 Based on the above information and analysis, the Commission determined that circumvention of anti-dumping duties through a slightly modified product from the country subject to measures has undermined the remedial effects of the duty in terms of quantities of the domestic like product.

ii) <u>Effects on Prices of the Domestic Like Product</u>

17.3.5 Information/data on the cost to make and sell, and the sale price of the domestic like product, and the landed cost of the products liable to antidumping duties and Slightly Modified Product for the proposed POI are provided in the following:

Table – X
Cost to Make & Sell, Prices, and Landed Cost

Year	Domestic industry's				Landed Cost of imports from China of		
	Cost to make & sell	Sales Price	Increase/ (decrease) in:		PUC (up to 1250 mm)		*PUI (Above 1250 mm)
			Cost to make & sell	Sales Price	With ADD	Without ADD	
(1)	(2)	(3)	(4)	(5)	(6)	(7)	

2021	100.00	114.45	-	-	112.97	96.81	-
2022	140.25	139.22	40.25	24.77	166.71	142.86	135.57
2023	151.91	168.33	11.66	29.12	172.24	147.62	139.95
2024	156.13	150.41	4.22	-17.93	167.37	143.87	141.12

Source: the Applicants and WEBOC

Note: In order to maintain confidentiality, actual figures have been indexed w.r.t cost to make and sell figures of the year 2020 by taking it equal to 100.

17.3.6 The above table indicates that in the year 2022, when the anti-dumping duties were capped on CRC up to 1250 mm, i.e., PUC, the landed cost of PUC with anti-dumping duty was significantly higher than the Domestic like product's price. This price gap was providing a cushion for domestic producers, helping them remain competitive against unfairly priced imports. However, the landed cost of CRC above 1250 mm was already below the domestic price.

17.3.7 This trend became more prominent in 2023, when the increase in the landed cost of PUI was less than the increase in domestic price. Importers increasingly exploited this price differential by importing PUI from China at lower prices and slitting them into narrower widths that directly compete with domestic products. This practice allowed these imports to undercut domestic prices, leading to price suppression in the domestic market.

17.3.8 By the year 2024, the landed cost of PUI had further slightly increased, while the domestic price fell compared to the previous year. This decline in domestic prices is a clear indicator that the domestic industry has been forced to lower prices in response to increasing volumes of PUI, which are cheaper and still meet the same market demand due to post-import slitting.

17.3.9 The data in the above table demonstrates that although the anti-dumping duty was intended to restore fair competition and support local industry, the circumvention through PUI has effectively nullified its impact. Imports from China have simply shifted to a near-identical product, free of anti-dumping duties, maintaining their presence in the domestic market at lower landed costs, and continuing to exert downward pressure on domestic prices.

17.3.10 Based on the above information and analysis, the Commission determined that circumvention of anti-dumping duties through a slightly modified product from the country subject to measures has undermined the remedial effects of the duty in terms of prices of the domestic like product.

F. <u>Economic Justification:</u>

18.1 The determination of whether anti-dumping duties apply to imports of allegedly circumvented products hinges on the existence of a valid economic justification. In order to assess this critical factor, the Commission requested importers and domestic users of CR Coils/sheets to provide the requisite data and information to substantiate the genuine commercial need that apparently drove the significant surge in imports of PUI. However, the importers or users cooperated with the Commission and failed to establish any legitimate, non-circumventing use for the increased import volumes of PUI. The Commission thus analyzed the physical properties and trade patterns of both products and determined that:

- Both products, PUC and PUI, are identical, and the only difference lies in width, which can be eliminated through slitting. Slitting is a common industrial process used to cut coils into narrower strips, which is equally applicable to PUC and PUI.

- Prior to the imposition of anti-dumping duties, exports of the slightly modified product/PUI from Chinese exporters were zero, as shown in Table V. However, imports of PUI drastically increased to circumvent the anti-dumping duties applicable to dumped imports of PUC.

18.2 The surge in imports of this slightly modified product, occurring immediately after duties were imposed, coupled with the absence of any verifiable economic rationale, led the Commission to conclude that the modification constituted a clear scheme of circumvention intended solely to avoid the duties.

G. Summary of the Findings of the Commission on Factors Determining Circumvention

19.1 The table below summarizes the Commission's findings in relation to the factors determining whether the circumvention goods are slightly modified.

S. No.	Factors determining circumvention	Differences between the goods and the circumvention goods
i.	General and Physical Characteristics of the products	No difference
ii.	Products Similarity and End Use	Substitutable
iii.	Interchangeability of Both Products	Interchangeable
iv.	Production process of products	Insignificant
v.	Cost of modification	Insignificant
vi.	Trade Pattern of products	Indicative of circumvention
vii.	Price Trends of products	Inconsistent

viii.	Remedial effects	Undermined
ix.	Economic Justification	No economic conditions have necessitated the increased importation of a slightly modified product

19.2 Based on the application, the Commission's analysis of submissions received, the Commission makes the finding in relation to PUC exported from China that a circumvention activity in the form of a slight modification of the goods exported to Pakistan has occurred.

H. Conclusion:

20. Having examined the contentions of the domestic industry, other sources, and based on the above analysis, it is concluded that:

i) The definitive anti-dumping duties imposed on the dumped imports of CR Coils/Sheets of a thickness ranging from 0.15 mm to 3.00 mm and a width up to 1250mm (PUC) from China were circumvented by the imports of CR Coils/Sheets above 1250 mm width (PUI or Slightly Modified Product).

ii) The anti-circumvention investigation showed that there was a change in the pattern of trade between the China and Pakistan for CR Coils/Sheets of a thickness ranging from 0.15 mm to 3.00 mm and a width up to 1250mm up to 1250 mm width (PUC) and CR Coils/Sheets above 1250 mm width (PUI or Slightly Modified Product), which stemmed from a practice, process or work for which there was insufficient due cause or economic justification other than the imposition of antidumping duties;

iii) The Commission found that the remedial effects of anti-dumping duties imposed on dumped imports of CR Coils/Sheets up to 1250 mm width (PUC) from China are being undermined in terms of the prices and/or quantities of the like product.

I. <u>Extension of Definitive Anti-Dumping Duties</u>

21. The Commission is satisfied that the anti-dumping duties imposed on dumped imports of CR Coils/Sheets up to 1250 mm width (PUC) from China are being circumvented into Pakistan and it has undermined the remedial effects of the anti-dumping duties in terms of the prices or quantities of the domestic like product.

22. Therefore, the Commission has decided to extend the existing anti-dumping duty @ of 19.04 % on imports of CR Coils/Sheets of iron or non-alloy steel of a thickness ranging from 0.15

mm to 3.00 mm above 1250 mm width (Product Under Investigation or Slightly Modified Product), classified under PCT Heading 7209.1510, 7209.1590, 7209.1610, 7209.1690, 7209.1710, 7209.1790, 7209.1810, 7209.1899, 7209.2510, 7209.2590, 7209.2610, 7209.2690, 7209.2710, 7209.2790, 7209.2810 and 7209.2890, excluding Tin Mill Black Plate and CR Coils/ Sheets used in automotive outer skins of four wheeler vehicles of auto grades as specified below;

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

23. This extension shall be effective from the date of this notification and shall remain in force in accordance with the continuation of the second sunset review of anti-dumping duties imposed on dumped imports of CR Coils/Sheets.

24. CR Coils/Sheets up to 1250 mm width (PUC) originated in/and or imported from sources other than China shall not be subject to the above-mentioned antidumping duty rate.

25. In accordance with Section 51(I)(ea) of the Act, extension of the definitive antidumping duty on Product Under Investigation will not be levied on imports of Product Under Investigation that are used as inputs in product destined solely for exports or for use in the foreign grant in aid projects, and are covered under any Scheme exempting customs duties for exports or foreign grant in aid projects under the customs act, 1969 (IV of 1969).

26. Extension of the antidumping duty on Cold Rolled Coils /Sheets of a thickness ranging from 0.15 mm to 3.00 mm above 1250 mm width (Product Under Investigation or Slightly Modified Product) would be in addition to other taxes and duties leviable on its imports under any other law. The extension of the antidumping duty on Cold Rolled Coils /Sheets above 1250 mm width (Product Under Investigation or Slightly Modified Product) shall be collected in the same manner as customs duty is collected under the Customs Act, 1969 (IV of 1969), and shall be

deposited in the Commission's Non-lapsable PLD Account No 187 maintained under the head account "G-11217", PLA with Federal Treasury Office, Islamabad.

(Ahmed Sheraz)
Member

(Imran Zia)
Member

(Muhammad Iqbal Tabish)
Member

(Naeem Anwar)
Member

(Abdul Rashid Sheikh)
Chairman

Annex-I

Comments of Interested Parties	***NTC View***
Views/Comments of Iftikhar Steel House Pvt. Ltd, M.R.F Auto industry Pvt. Ltd, New Asia Auto Mobile Pvt. Ltd. etc.	
• *.....The product imported by us are distinct in specification, classification and end use. These are not slightly modified version of the products covered under the original duties, but separate goods falling outside the scope of the existing order.* • *CRC material that imported by us and deliver for those manufacturers who can not import that material and the size has to be slightly modified due to companies demand than they made auto parts.....* • *Due to unavailability of such material in the domestic market, it becomes necessary for us to source it form international suppliers to meet out demand....*	The Commission determined that the PUC and PUI are the same products. Refer to the Commission's analysis at para 18.1.2 of the report. The Commission determined that Slitting is a common industrial process used to cut coils into narrower strips which can be equally applicable to PUC and PUI (Refer para 19.1 of the report). Further, CRC Coils/Sheets used in automotive outer skins of four wheeler vehicles of certain auto grades are already excluded from the scope of anti-dumping duties (Refer para 4.3 of the report). Before 2022 the import of PUI from China was zero which shows that there was no demand of imported PUI from China. The Commission determined that circumvention of anti-dumping duties through slightly modified product from the country subject to measures have undermined the remedial effects of the duty in terms of quantities of the domestic like product (Refer para 18.3 of the report).
Views/Comments of Pak Pipe Industries (Pvt.) Ltd.	
• *Pak Pipes Industries Limited is a manufacturer that imports CR coils of 1270mm width exclusively for in-house use in the production of various steel pipes......*	The information provided by the Pak Pipe Industries (Pvt.) Ltd. confirms that it started importing of CR Coils/Sheets of width 1270 mm from mid-2023 (after caping on width in 2022) before that Pak Pipe Industries (Pvt.) Ltd. used domestically procured CR Coils/Sheets. The fact that there was no or negligible import of PUI prior to imposition of anti-dumping duties on PUC confirms the complete

• *Coils above 1250mm, such as the 1270mm coils used by Pak Pipes Industries, are preferred specifically for their suitability for slitting into multiple pipe strip sizes. This enables enhanced material efficiency, reduced edge waste, and greater operational flexibility, which is not possible with narrower coils….* • *The coils of >1250 mm width serve a functionally distinct role from coils ≤1250 mm. Therefore, they should not be viewed as interchangeable products in terms of market usage, manufacturing process, or anti-dumping analysis….* • *Pak Pipes Industries Ltd strongly states that Cold Rolled (CR) coils/sheets of width up to 1250 mm and those above 1250mm (such as 1270mm) are not interchangeable in practical industrial terms, particularly in pipe manufacturing.* • *It is pertinent to highlight that the domestic industry, including the complainants, does not produce CR coils of widths above 1250 mm, nor does it supply comparable material in terms of dimensional range, efficiency, or surface quality….*	interchangeability of both the products for the user industry. The Commission determined that the PUC and PUI are the same products and are interchangeable. Refer to the Commission's analysis at para 18.1.3 of the report. Further, before 2022 the import of PUI from China was zero which shows that there was no demand of imported PUI from China. The Commission determined that circumvention of anti-dumping duties through slightly modified product from the country subject to measures have undermined the remedial effects of the duty in terms of quantities of the domestic like product (Refer para 18.3 of the report).
• *It is important to highlight that International Steels Limited (ISL) one of the key complainants in this anti-dumping investigation is approximately 56% owned by International Industries Limited (IIL), which is Pakistan's largest manufacturer and exporter of steel pipes and tubes. This corporate relationship presents a clear conflict of interest….*	There is no conflict of interest in case one of the Applicant is related to one of the importers, by filing this application the ISL's interest is aligned with the domestic industry producing CR Coils/Sheets instead of its related importers.

Annex-II

Comments of Interested Parties	***NTC View***
Views/Comments of Applicant on (SEF)	
Mapping the Commission's earlier practice to determine Circumvention in the subject investigation: *The Commission in the Anti-circumvention of Galvanized Coils / Sheets relied on a 14-factor analytical framework to assess whether imports of Galvalume Steel Coils/Sheets (Slightly modified product) from China constituted circumvention of the anti-dumping duties imposed on Galvanized Steel Coils/Sheets (product subject to antidumping duty)……….. , it is evident that imports of CRC of widths above 1250 mm possess the same essential characteristics as the product subject to anti-dumping measures, CRC of widths up to 1250 mm, and directly in competition…..*	The Commission made determination in this investigation in terms of Section 63 of the Act and Chapter V of the Rules and considered the conditions and requirements for anti-circumvention investigation.
Lack of Cooperation by Exporters and Importers and Reliance on Facts Available *Domestic Industry concurs with the Commission's essential finding that exporters and importers have failed to cooperate meaningfully in the present anti-circumvention investigation…….*	The Commission has sought all the relevant information/data deemed necessary for the purpose of this anti-circumvention investigation of anti-dumping duties levied on dumped imports of CR Coils/Sheets and injury to the domestic industry. In terms of Rule 11 of the Rules, the Commission confirmed the accuracy of the information provided by interested parties during this anti-circumvention investigation (Refer para 12 of the report).
Conclusion and Prayer: *…..The domestic industry remains hopeful that <u>the Honourable Commission will recognize the intent and effect of these circumventing imports, and will extend the scope of definitive anti-dumping duties on product under investigation i.e. CRC Above 1250mm</u> under Section 63 of the Anti-Dumping Duties Act, 2015.*	The Commission concluded and made determination in this investigation in terms of Section 63 of the Act and Chapter V of the Rules
Views/Comments of Pak Pipe Industries (Pvt.) Ltd. on SEF	

The Commission's Premise Is Legally and Technically Flawed: *The Commission maintains that the difference between CR coils up to 1250 mm and those above 1250 mm is limited to "only slitting with 2–3% value addition." This assertion is overly simplistic, incomplete, and legally irrelevant in determining circumvention. The assessment should not be confined to the arithmetic cost of a single processing step…..*	Commission analyzed all available and known factors to see whether circumvention has taken place or not.
Comprehensive Circumvention Analysis: *A proper circumvention analysis under trade remedy law requires a holistic evaluation that extends beyond mere cost considerations…..*	The Commission made determination in this investigation in terms of Section 63 of the Act and Chapter V of the Rules and considered the conditions and requirements for anti-circumvention investigation.
Slitting Is Not a Cosmetic or Nominal Operation in Pipe Manufacturing *While slitting may appear simple in isolation, it is a critical production defining operation in pipe manufacturing and not a trivial modification**.** Key points overlooked in the Commission's assumption include:* ***Precision & Yield Dependency*** *Slitting determines strip width accuracy, edge quality, camber control, and downstream weld integrity. Minor dimensional deviations can result in coil rejection, weld failure, or off-spec pipes.* ***Material Efficiency*** *Impact The choice of base coil width (1270 mm vs ≤1250 mm) directly influences the number of strips per coil, scrap generation, and recoverable yield per metric ton. As technical tables submitted show, 1270 mm coils allow for optimal strip combinations not possible with ≤1250 mm coils.* ***Operational Scale*** *Slitting at an industrial scale requires dedicated wide width slitting lines (up to 1600mm), skilled operators, tooling changeovers, and scrap handling and reprocessing costs. These realities cannot be reduced to a notional "Rs. 3,000–5,000 per MT" figure.* ***The "2–3% Value Addition" Argument Is Legally Irrelevant*** *Even if slitting adds only 2–3% in accounting terms (a claim which is disputed), value addition percentage is not the legal test for circumvention…..*	Commission just not considered the slitting factor in determination. Commission considered the relevant conditions and requirements for anti-circumvention investigation. Commission findings are based after considering the relevant factors of circumvention (Refer para 20 of the report). The Commission determined that Slitting is a common industrial process used to cut coils into narrower strips which is equally applicable to PUC and PUI (Refer para 19.1 of the report).

Slitting Cost Alone Ignores Decisive Economic Factors *The Commission's focus on slitting cost selectively ignores larger economic drivers, including:* ***Scrap Reduction….*** ***Freight and Handling Efficiency…*** ***Production Continuity….***	Commission considered the relevant conditions and requirements for anti-circumvention investigation.
No Intent to Circumvent Can Be Inferred: *…. Pak Pipes Industries did not import any coils above 1250 mm prior to 2023….* *…. If circumvention were the objective, imports would have occurred immediately upon duty extension in 2021, which did not happen.*	Pak Pipe Industries (Pvt.) Ltd. starts importing of CR Coils/Sheets of width 1270 mm from mid-2023 (after caping on width in 2022) before that Pak Pipe Industries (Pvt.) Ltd. used domestically procured CR Coils/Sheets.
Absence of Domestic "Alike Product" Defeats the Circumvention Theory *A critical omission in the Commission's reasoning is that no domestic producer manufactures CR coils above 1250 mm….*	Before 2022 the import of PUI from China was zero which shows that there was no demand of imported PUI from China. The Commission determined that circumvention of anti-dumping duties through slightly modified product from the country subject to measures have undermined the remedial effects of the duty in terms of quantities of the domestic like product (Refer para 18.3 of the report).
Rebuttal to Commission's Findings on Similarity & Interchangeability: ***General and Physical Characteristics of the Products:*** *…..The Commission's conclusion incorrectly conflates metallurgical similarity with functional equivalence. While both PUC and PUI are derived from HRC and share the same base metallurgical composition, this factor alone does not establish product likeness or substitutability as required under trade remedy law……* *…..Although these products have the same base composition, variations in dimensions, structure, or processing result in non-substitutability. Similarly, CRC of 1270mm is not simply a variant of ≤1250mm CRC, but represents a distinct industrial input designed for different production outcomes.*	The Commission determined that the PUC and PUI are the same products and are interchangeable. Refer to the Commission's analysis at para 18.1.3 of the report.
Commission's Assertion on Applications and End Use Functionalities	The Commission determined that the PUC and PUI are the same products and are

***.....This reasoning misapplies the concept of "capability" as equivalent to "functional substitutability.".....* *....While both products fall under "pipe manufacturing," the range, efficiency, and economics of pipe variants differ materially....* *.....Therefore, the functional role of the two products within the same industry is materially different.....* *Accordingly:* *• PUC and PUI are not interchangeable* *• PUI does not substitute PUC* *• Imports of coils greater than 1250 mm cannot be considered circumvention*	interchangeable. Refer to the Commission's analysis at para 18.1.3 of the report.
Interchangeability of Both Products: *.....This conclusion does not meet the standards set by legal and technical tests for interchangeability...*	The Commission determined that the PUC and PUI are the same products and are interchangeable. Refer to the Commission's analysis at para 18.1.3 of the report.
Absence of a Domestic Like Product and Its Direct Impact on Interchangeability: *.....The absence of a domestic like product eliminates any meaningful interchangeability analysis. It confirms that imports of coils above 1250 mm are necessity-driven, not duty driven, and demonstrates that PUC and PUI occupy distinct commercial and functional spaces. Accordingly, imports of CR coils above 1250 mm cannot, as a matter of law or fact, be treated as interchangeable with or substitutable for domestically produced coils of 1250 mm or less.....*	Further, before 2022 the import of PUI from China was zero which shows that there was no demand of imported PUI from China. The Commission determined that circumvention of anti-dumping duties through slightly modified product from the country subject to measures have undermined the remedial effects of the duty in terms of quantities of the domestic like product (Refer para 18.3 of the report).
Rebuttal to the Commission's Selective Cost and Injury Analysis ***Incomplete and Methodologically Flawed Cost Analysis.....*** ***Slitting Cost Is Not the Relevant Economic Benchmark....***	The Commission made determination in this investigation in terms of Section 63 of the Act and Chapter V of the Rules and considered the conditions and requirements for anti-circumvention investigation.
Omitted Key Cost Components *Several crucial cost components are absent from the Commission's analysis:* *Scrap Loss and Material Yield: .....*	The Commission made determination in this investigation in terms of Section 63 of the Act and Chapter V of the Rules and considered the conditions and requirements for anti-circumvention investigation.

Production Downtime and Changeover Costs: ..... *Energy Consumption and Process Losses: .....* *Inventory Fragmentation and Handling: .....* *Quality Rejection and Downstream Losses: .....* *Injury Analysis Must Reflect Net Economic Impact: .....* *International Practice Rejects Single-Factor Injury Assessments….* *.....The Commission's depiction of cost and potential injury is incomplete and selective, excluding decisive cost drivers and overemphasizing a minor processing cost. This approach fails to accurately reflect real industrial economics. Therefore, any inference of circumvention or potential injury based on such partial data is unsustainable and must be reconsidered considering the full cost structure and production realities.*	