BULK DRUG MANUFACTURES ASSOCIATION (INDIA)

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Circular No. BDMA/090/2026 **Date: 26th Oct 2026**

Dear Sir

Sub: Directorate General of Trade Remedies (DGTR) initiates anti-dumping duty on *Isopropyl Alcohol*

We wish to inform that we received a communication from the Department of Pharmaceuticals, Government of India, informing that DGTR initiated anti-dumping duty process on Isopropyl Alcohol originating from RP China. Copy of the communication is enclosed for reference.

With a view to analyse the impact of anti-dumping duty on the Isopropyl Alcohol (PUC), if imposed, on downstream industries DGTR has sought requisite information as per the attached EIQ Economic Interest Questionnaire (EIQ), *a copy of which is enclosed for reference*.

Members are requested to go through the communication received from Department of Pharmaceuticals and provide the requisite inputs directly to Mr. Rajat Gautam, Policy Section at aso1-policy2@pharma-dept.gov.in with a copy to us, at the earliest.

With regards

M Roja Rani
Executive Director

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e-Marketing Portal of Indian Bulk Drugs

ECONOMIC INTEREST QUESTIONNAIRE

for [*AD/CVD*] INVESTIGATION against (Name of the subject countries)

in respect of [*NAME OF Product Under Consideration or PUC*]

PART-I. GENERAL SECTION [1](FOR ALL STAKEHOLDERS INCLUDING ADMINISTRATIVE/LINE MINISTRY)

1. Name and details of the company/association/consumer group/others:

   a. Name
   b. Address
   c. Name and designation of contact person
   d. Contact No.
   e. Email address
   f. Website
   g. Contact Details of legal representative, if any.

2. Status of the interested party (tick the relevant cell among the following).

Government body		Importer	
Domestic producer		Distributor or dealer	
Trader		Consumer	
Downstream user		Association of PUC	
Upstream producer		Association of Downstream Products	
Consumer groups		Association of Upstream Products	
Exporter/Producers		Others (specify)	

Note-1: Provide the relevant details as deemed fit.

3. If you are any association as mentioned above, provide the following details:

   (a) Is the Association a registered body? If so a copy of the Registration Certificate;
   (b) A copy of the By-laws & Memorandum of Association (MOA);
   (c) A list of the members;
   (d) Details of the Executive body / Managing structure of the Association;
   (e) A copy of the minutes of the meeting in which it was resolved by the Association to file this questionnaire response on behalf of some/all its members;
   (f) A list of the members, who either supported, opposed or remained neutral with regard to the said response; and
   (g) Any other information which may be relevant in this regard.

4. Whether your industry consists majorly of Micro, Small and Medium Enterprises (MSMEs).[2] If yes, in case of Indian producer (whether domestic industry/ importer/ user), provide your relevant MSME certificate or in case of association, declare how many members of the association have MSME certificate.

5. Explain how the alleged dumping, subsidization, increased imports or imposition of duty has affected your company's operations. Please quantify such impact.

[1] Please fill N.A. (not applicable), wherever applicable.
[2] For the meaning and definition of "MSME", the relevant notifications/circulars issued by the Central Government in this regard shall apply.

6. Indicate any non-tariff barriers for the PUC or its immediate downstream product in India.

7. Substantiate how the duty on PUC, if levied, is likely to impact the downstream users and final consumers of the PUC. Please substantiate such impact in terms of increase in the cost and price of the immediate downstream product and eventual end product. Please provide relevant calculation and supporting evidence.

8. Provide the number of employees involved in the production of the PUC/ downstream/ upstream product, as applicable.

9. Provide details of whether any trade remedial measures exist or are proposed on any upstream, downstream, joint, substitute or otherwise related products in India or outside, which might impact your operations or the operations of the downstream user industry.

10. Provide any other information that may be relevant for the present investigation.

PART-II. ADMINISTRATIVE / LINE MINISTRY

1. Name of the Administrative Ministry

2. Provide the name of the product, to which the administrative ministry belongs, and also provide the following details relating to such product:

   (a) Category (PUC/Downstream/upstream)

   (b) Total estimated production and

   (c) No. of estimated producers of the product.

   (d) The impact on such product (please quantify) in case the duty is levied on the PUC

3. Whether the Ministry support or oppose the duty on PUC and reasons for the same.

PART-III. DOMESTIC PRODUCERS

1. Provide evidence regarding the prevailing prices of the PUC in the market. Also provide details of how the prices of the PUC have evolved in the last 5 years, including but not limited to the comparison to cost of production.

2. Indicate whether the industry for the PUC is majorly located in a particular geographical region. Please explain the impact thereof on the user industry. Provide information for the following zones of India:

S. No.	Parameters	North	South	East	West	Central	North-East	Total
1	Installed Capacity							
2	Production							
3	Consumption							
4	Imports							

3. Provide the % utilisation of the PUC in the immediately downstream product.

4. Re-sale price of the imported PUC at retail level in India.

5. Provide any other information that may be relevant for the present investigation.

PART-IV. IMPORTERS AND / OR DOWNSTREAM USERS

1. (a) Indicate whether you have entered into any long-term contracts with the suppliers of the PUC in India as well as internationally.

   (b) Also specify whether you can switch suppliers in case of imposition of duty on PUC. If not, specify the reasons for your inability to switch suppliers.

   (c) Clarify as to whether the finished products produced by your company has a substitute. Also indicate whether it is likely that consumers would switch to another product in case the cost of your product increases due to the imposition of the duty on PUC, if levied.

2. Substantiate with calculations whether the downstream industry would bear or pass on the increase in the costs due to the duty on PUC, if levied.

3. Substantiate as to how the duties on the PUC (previous duties in place or duties, if levied on the PUC pursuant to the present investigation) imported from subject country or other countries have impacted the costs and prices of the Downstream Product during IIP:

S. No.	Parameter	Unit	Year 1	Year 2	Year 3	POI
1	Consumption of the PUC in the finished product					
a	Volume					
b	Value					
2	Production of the Finished product					
a	Volume					
b	Value					
3	% Share of PUC in finished product					
4	Quantum of ADD paid					
5	Impact of ADD paid on finished product in absolute terms					
6	Impact of ADD paid on finished product as % of price of the finished product					
7	Return on Investment (%)					

Note: "ADD paid" here means ADD currently in place (in case of SSR) or ADD in the present investigation (if suppose 10% is proposed, for example)

4. Provide evidence regarding the prevailing prices of the PUC in the market. Also provide details (with its contributing factors) of how the prices of the PUC have evolved during the IIP. Evidence may include invoices, price lists, discounts given, actual prices paid over the IIP, contracts signed with domestic or foreign suppliers.

5. Substantiate whether the demand of the PUC is highly price-sensitive. If you consider that there are factors other than price [e.g. Costs & expenses, supply-side (low demand due to higher degree of buyer's market), seller's market, consumer perceptions, competition and/or the like] that have impacted your purchase decisions, list the same and substantiate with relevant evidence.

6. Provide details whether the production technology used by the PUC-producers in India is inefficient/ obsolete. Whether difference in the technology has led to PUC being unviable? Please provide evidence.

7. Provide details of any future investments or expansions or forecasted changes that your company and the Indian industry consuming the PUC in India is planning in the next five years with regards to PUC.

Name of such Producer	Expected capacity (MT)	Expected timeline (months)	Expected Investment (Rs. Cr.)	Desired return on investment (Rs. Cr. or %)

Note: For the above table, specify the basis of indicating the desired return on investment.

8. Specify whether the downstream user industry for the PUC is majorly located in a particular geographical region. Please explain the impact thereof on the user industry. Provide information for the following zones of India:

S. No.	Parameters	North	South	East	West	Central	North-East	Total
1	Installed Capacity							
2	Production							
3	Consumption							
4	Imports							

9. Provide details of alternate sources of supply of the PUC

10. Provide information along with evidence whether you are aware of any anti-competitive or customer discriminatory behaviour adopted by the producers in India.

11. Provide details of whether you anticipate any supply shortages of the PUC in the near future due to prioritization of certain market segments (captive consumption, related sales, domestic market, export obligations, etc.) by the domestic producers of PUC.

12. Provide details of country-wise exports made by your company (volume and value) during the IIP. Also specify whether such exports can be made using duty exemption or remission schemes. If the PUC was imported for production of your product, specify whether the import was made using duty exemption or remission schemes. If duty exemption or remission schemes was not used, elaborate reason for the same. Please quantify the amount of duty benefit in case of purchase under advance license. If the Govt. of India has specified Duty DrawBack rate (DDB) for your product, please specify the current rate of DDB.

13. Provide details of any interruptions in the domestic production of the PUC in the last four years. Please substantiate whether such interruptions impacted the cost and price of the PUC along with relevant evidence or calculations. Also indicate forecasted

factors (currency fluctuation, raw material shortages, government policy, shutdown, closure, etc.) that may affect production in the future.

14. Provide details of whether any related industry is likely to be impacted due to the imposition of duty on PUC, if levied.

15. Provide any other information that may be relevant for the present investigation.

PART-V. UPSTREAM INDUSTRY

1. Provide details of the major users of your product and their market share of the PUC.

Name and contact details of the upstream producer	Share of upstream producer in market for PUC

2. Provide the volume of sales made by your company with an estimation of the Indian industry producing the immediate upstream product of the PUC in the last four years.

Volume of Sales (MT)	Year 1	Year 2	Year 3	Year 4
Name of upstream producer				
Indian Industry producing the immediate upstream product of the PUC				

3. Indicate the % share of your product used in the PUC in total sales of your company.

4. Explain the level of your company's dependency on the domestic production of the PUC. Provide volume of sales of your product made to the Indian industry producing PUC.

5. Provide details of any future investments or expansions or forecasted changes that your company or Indian industry producing upstream product is planning in the next five years with regards to product used in PUC.

Name of such Producer	Expected capacity (MT)	Expected timeline (months)	Expected investment (Rs. Cr.)	Desired return on investment (Rs. Cr. or %)

Note: For the above table, specify the basis of indicating the desired return on investment.

6. Substantiate along with relevant calculations the impact of dumping of the PUC on the performance of your company and the Indian industry producing the upstream product, if any. Provide details of volume and value of sales of your product to the producers of PUC over the IIP. In case your product prices were impacted due to dumping of the PUC, substantiate the same and please quantify the impact in absolute terms and as % of the price of your product during the POI.

7. In case of Sunset Review (SSR) investigation, explain how the imposition of duties has affected operations of the upstream industry of the PUC. Please quantify such impact.

S. No.	Particulars	UOM	Year 1	Year 2	Year 3	POI
1	**Production**	MT				
2	**Total Sales volume**	MT				
a	Domestic sales	MT				

b	Export sales	MT				
c	Captive consumption	MT				
3	**Total Sales value**	Rs. In Lacs				
a	Domestic sales	Rs. In Lacs				
b	Export sales	Rs. In Lacs				
c	Captive consumption	Rs. In Lacs				
4	**Profits / loss**	Rs. Per MT				
5	**Return on investment**	%				
6	**Employment**	Numbers				
7	**Any other parameters**	Please specify				

Note: Change the unit (e.g. MT) as applicable for the product

8. Provide any other information that may be relevant for the present investigation.

Glossary of Terms used:

- POI: Period of Investigation in the present investigation
- IIP: Injury Investigation Period (which includes POI) in the present investigation
- PUC: Product Under Consideration in the present investigation
- ADD: Anti-Dumping Duty
- SSR: Sunset Review Investigation
- MT: Metric Tonne, if applicable (alternatively the unit as applicable for the product should be used)
- UOM: Unit of Measurement

Outlook

Initiation of an anti-dumping investigation concerning imports of "Isopropyl Alcohol (PUC)" from China PR - reg.

From rajat gautam <aso1-policy2@pharma-dept.gov.in>

Date Mon 2026-10-26 11:09 AM

To amittalwar <amit.talwar@ipa-india.org>; Archanajatkar <archana.jatkar@ipa-india.org>; sudarshanjain <sudarshan.jain@ipa-india.org>; akmadanidma <akmadan.idma@gmail.com>; daara <daara@idmaindia.com>; info <info@bdmai.org>; Ed <ed@bdmai.org>; prashantsharma <prashant.sharma@indiaoppi.com>

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1 attachment (176 KB)

Economic Interest Questionnaire DGTR (2).pdf;

Madam/Sir,

Your kind attention is invited to Initiation of anti-dumping investigation concerning imports of "Isopropyl Alcohol (PUC)" from China PR (Subject Countries), based on application filed by M/s Deepak Fertilisers and Petrochemicals Corporation Limited (Applicants). The subject investigation was initiated by the Directorate General of Trade Remedies (DGTR) under the Ministry of Commerce & Industry; New Delhi *vide* Initiation Notification number 6/62/2026-DGTR dated 28.09.2026. As mentioned above, the product under consideration (PUC) in the said investigation is "Isopropyl Alcohol" originating in or exported from China PR. **The PUC is imported under Chapter 29, under the sub-heading 29051220.**

2. DGTR wants to analyze the **impact of anti-dumping duty on the Isopropyl Alcohol (PUC), if imposed, on downstream industries** in its investigations, and therefore has sought requisite information as per the attached EIQ Economic Interest Questionnaire (EIQ) (*a copy of the same is attached for your kind reference*).

3. In this regard, you are requested to examine **Parts III, IV and V of the enclosed EIQ**, relating to Domestic Producers, Importers/Downstream Users and the Upstream Industry, respectively, and provide the requisite inputs to this Department **at the earliest**.

with regards,

Rajat Gautam, ASO
Policy Section II
Department of Pharmaceuticals