ANTI-DUMPING INVESTIGATION INITIATED IN INDIA ON CRGO AND AMORPHOUS METAL IMPORTS FROM JAPAN, CHINA, KOREA RP AND RUSSIA: WHAT SHOULD JAPANESE EXPORTERS DO NEXT?

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India's Directorate General of Trade Remedies (DGTR) has initiated an anti-dumping investigation concerning imports of Cold Rolled Grain Oriented Electrical Steel (CRGO) and Amorphous Metal (AM) originating in or exported from Japan, China PR, Korea RP and Russia.

For Japanese steel producers and exporters, this investigation is significant not only because Japan steel industry is one of the world's leading manufacturers of premium grain-oriented electrical steel, but also because India is expected to witness sustained growth in demand for transformer-grade electrical steel as it continues expanding its transmission infrastructure and renewable energy capacity. Furthermore, several Japanese enterprises are already manufacturing transformers in India through their Indian subsidiaries, many of which procure CRGO from Japanese parent companies, affiliated group companies, or long-standing trading partners. The potential imposition of anti-dumping duties on the considered product may have a significant impact on Keiretsu-styled supply-chain relations in the steel industry, and have an effect even on the domestic electric industry and other companies well beyond the borders of India.

A few aspects of the initiation notification deserve particular attention:

• The Product Under Consideration (PUC) includes both **CRGO** and **Amorphous Metal**, despite the domestic applicant manufacturing only CRGO. The notification proceeds on the prima facie view that the two products are technically and commercially substitutable for transformer core applications. As per standard practice, the DGTR does not impose duties if the Domestic Industry does not have the capability to produce a product, since in such cases imports become essential to meet domestic demand. However, in the present case, the DGTR have taken a prime facie view during the investigation-stage itself, which may become a point of concern for interested parties

It will be interesting to see whether interested parties challenge this approach during the investigation.

• The investigation covers the **Period of Investigation from 1 April 2025 to 31 March 2026**, and period for injury analysis would be from April 2022 – March 2026.

• The applicant has also requested **retrospective imposition of anti-dumping duties for up to 90 days prior to the imposition of any provisional duty**, a request that may become an important aspect of the proceedings.

Perhaps most importantly, exporters should be mindful of the procedural timelines. Since anti-dumping investigations are procedurally time bound and the authorities themselves need to comply with strict time-limits, missing the deadlines may deter authorities and restrict a party's ability to present evidence and make points to defend their interests during the investigation.

Key deadlines include:

- **15 days** to submit comments on the scope of the PUC and any proposed Product Control Number (PCN) methodology (running concurrently with the main response period);
- **37 days** from circulation of the non-confidential application to submit questionnaire responses and supporting evidence through the DGTR's SETU portal;
- An additional **15-day extension** may be granted if the Authority subsequently modifies the PUC or PCN methodology;
- Requests for extension should ordinarily be filed **at least one day before** the applicable deadline.

From a strategic perspective, this investigation presents several issues that exporters may wish to consider at an early stage, including product scope, the treatment of Amorphous Metal as a like article, dumping calculations, injury analysis, and the availability (or otherwise) of domestically produced equivalents for premium grades of GOES.

Nonetheless, with cooperation from the exporters and strong representation, the impact or damage caused by this notification can be significantly reduced or negated altogether.

Trade remedy investigations are often won or lost during the evidence-gathering phase. Early engagement with the process is therefore usually preferable for addressing the issues raised in the notification. It will certainly be an investigation worth following over the coming months.

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