November 7, 2026

DIRECTORATE GENERAL OF TRADE REMEDIES

Anti-dumping sunset review, new shipper review and anti-circumvention

A sunset review of anti-dumping duty asks whether dumping and injury would return if the duty ended, and Indian industry should normally apply at least 270 days before expiry. A mid-term review tests whether the duty is still needed, a new shipper review sets a new exporter's rate, and anti-circumvention and anti-absorption cases follow rerouting and price cuts.

A SUNSET REVIEW IS A check by the Directorate General of Trade Remedies (DGTR), before a duty's five years end, of whether dumping and injury would likely continue or recur without it (rule 23(1B)). The government may then extend the duty up to five years (section 9A(5)). Industry should normally apply at least 270 days before expiry (Trade Notice 03/2021).

KEY FACTS

LAW

Customs Tariff Act, 1975

QUANTITATIVE RESTRICTIONS

Foreign Trade (Development and Regulation) Act, 1992

ONLINE FILING

Trade Notice No. 01/2025

UPDATED

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What is a sunset review of anti-dumping duty, and when is it filed?

A sunset review is a check by the Directorate General of Trade Remedies (DGTR), before a duty's five years end, of whether dumping and injury would likely continue or recur without it (rule 23(1B)). The government may then extend the duty up to five years (section 9A(5)). Industry should normally apply at least 270 days before expiry (Trade Notice 03/2021).

Anti-dumping duty lasts five years unless revoked earlier (Customs Tariff Act, 1975, section 9A(5)). See DGTR and trade remedies in India and anti-dumping duty in India.

Trade Notice No. 03/2021 of April 12, 2021 sets the 270 days. DGTR considers a later application only for bona fide hardship backed by evidence (paragraph 4).

The application must show the subject countries' total and surplus capacity, their exports to other markets, how much of their output they export, and why India would draw those exports once the duty ended (paragraph 5(i)).

In 2026 sunset reviews DGTR backed five more years of duty on aluminum foil from four countries and on trailer axles from China PR.

> Not 240, 180 or 120 days
>
> Question 39 of DGTR's FAQ booklet still allows 240 days with a late fee, from Trade Notice 02/2017. Trade Notice 02/2020 allowed 180 days, and 120 in rare cases. Trade Notice 03/2021 withdrew those relaxations and replaced earlier sunset instructions (paragraphs 4 and 7).

Does anti-dumping duty stay in force during a sunset review?

Anti-dumping duty stays in force during a sunset review, which must end within 12 months and at least 3 months before the duty expires (rule 23(2)). If a review started before expiry isn't finished in time, the government may keep the duty for up to one more year (section 9A(5), second proviso).

DGTR seeks the extra year case by case (Trade Notice 03/2021, paragraph 4(iii)). Three of the Finance Ministry's 2026 extensions:

Three duties kept in force during a 2026 sunset review

Goods	Kept in force until	The review
Aluminum foil, four countries	December 15, 2026 (No. 10/2026-Customs (ADD), June 10, 2026)	Extension recommended September 14, 2026 (findings)
Untreated fumed silica, China PR	February 10, 2027 (No. 19/2026-Customs (ADD), July 31, 2026)	Extension recommended November 6, 2026 (tracker)
Decor paper, China PR	March 26, 2027 (No. 23/2026-Customs (ADD), September 22, 2026)	To close by December 25, 2026 (DGTR notice; our summary)

For fumed silica, DGTR recommended keeping the existing amounts for five more years (findings, paragraphs 163 and 164). The government "may" extend; it isn't bound to (section 9A(5)).

Can exporters, importers and users take part in a review?

Exporters, foreign producers, importers, their associations, the exporting government and Indian producers are interested parties under rule 2(c) of the Anti-Dumping Rules, and may take part in any review. Industrial users and, for retail goods, consumer groups aren't on that list, but rule 6(5) lets them give information.

Reviews follow the investigation rules on evidence, confidentiality and disclosure (rule 23(3)). Each party registers on SETU, DGTR's online portal and answers the questionnaire.

In the ceramic tableware sunset review, nobody commented on product scope within 15 days, so DGTR kept it as notified (notice, paragraph 5). See answering DGTR as a foreign exporter and anti-dumping duty for importers.

What is a mid-term review at DGTR?

A mid-term review asks whether a duty is still needed, in full or at all, before its five years end. Any interested party, exporters and importers included, may apply with positive information a year or more after the duty was imposed (Trade Notice 1/2010; rule 23(1A)). DGTR may also start one.

Trade Notice No. 1/2010 of May 17, 2010 names exporters, importers, domestic producers and trade bodies as possible applicants (paragraphs 2 and 3). If DGTR finds that injury isn't likely to continue or recur once the duty is removed or varied, it recommends withdrawal (rule 23(1A)). This is the route to ending a duty early: section 9A(5) runs the five years "unless revoked earlier".

What is a new shipper review in India?

A new shipper review is DGTR's way to give an exporter that didn't ship to India during the original investigation its own dumping margin. It must be unrelated to the producers under duty (rule 22(1)) and have shipped commercial quantities first (Trade Notice 01/2019). No duty is charged on its goods during the review (rule 22(2)).

- **Rate:** where the original case used sampling, DGTR may give the rate of cooperating unsampled exporters (Trade Notice No. 01/2019, paragraph (e); rule 22(3)).
- **Time:** findings within one year of initiation, plus six months in exceptional cases (paragraph (f)).

If DGTR recommends it, the government may order provisional assessment during the review and ask the importer for a guarantee. If DGTR finds dumping, duty can run from the date the review began (rule 22(2), proviso).

On March 20, 2026 DGTR opened a new shipper review for Anhui Krant Aluminum Products Co., Ltd, a Chinese maker of solar panel frames (initiation). Notification No. 07/2026-Customs (ADD) put its exports on provisional assessment on May 19, 2026.

What is circumvention, and when does assembly count?

Circumvention is a change in trade with no reason other than the duty, which undermines it while the goods are still dumped (rule 25(1)). Assembly counts when it started just before or after the original case, uses parts from the country under duty, and adds under 35% of manufacturing cost (rule 25(2)(a)).

Forms of circumvention in rule 25(2) of the Anti-Dumping Rules

Form	What it means	Rule
Assembly or finishing	Parts from the country under duty, put together in India or elsewhere, adding under 35% of manufacturing cost	25(2)(a)
Altered goods	A changed name, description or composition, even a minor one, whatever the tariff heading	25(2)(b)
Routing	Goods sent through an exporter, producer or country not under duty	25(2)(c)
Any other way	Anything else that makes the duty ineffective	25(2)(d)

DGTR opens a case on an application by or for the Indian industry, or on its own on information from Customs or another source (rule 26(1) and (3)). It must finish within 12 months, at most 18 (rule 26(6)). Imports may be provisionally assessed meanwhile (rule 26(4A)).

If circumvention is found, the duty may be extended to those goods or countries, from the date the case began or a date DGTR recommends (rule 27(1) and (3)).

Which anti-circumvention investigations did India open in 2026?

DGTR opened anti-circumvention investigations in September 2026 on hydraulic rock breakers routed through Malaysia and on CPVC resin through Malaysia, Japan and Thailand. Both duties are on China PR and Korea RP, and DGTR recommended provisional assessment in both. In March it opened one on saccharin.

Anti-circumvention investigations opened in 2026

Goods and route	Opened	Where it stands
Hydraulic rock breakers and chisels, through Malaysia	September 28, 2026 (tracker)	Routing only (initiation, paragraph 12). Provisional assessment ordered November 5, 2026 (No. 27/2026-Customs (ADD))
CPVC resin, through Malaysia, Japan and Thailand	September 16, 2026 (tracker)	Provisional assessment recommended (corrigendum). Replies due December 2, 2026
Saccharin, through Thailand (countervailing duty)	March 10, 2026 (tracker)	Covered in our countervailing duty guide

DGTR moved the CPVC deadline from November 11 and said it won't move it again (letter of November 5, 2026, paragraphs 2, 4 and 6; our summary).

What is an anti-absorption investigation at DGTR?

An anti-absorption investigation is a DGTR case that asks whether exporters cut their prices to India after the duty, with no matching change in cost, in prices elsewhere or in resale prices in India (rule 29(1)). If so, DGTR may recommend changing the duty's amount or form, recalculating only the dumping and injury margins (rule 30(6)).

- **Who applies:** the Indian industry or any other interested party, normally within two years of the duty, and never with less than 12 months of it left (rules 29(3) and 30(1)).
- **From when:** a changed duty may apply from the date the case began, or a date DGTR recommends (rule 31(1) and (3)).

DGTR opened a glufosinate case (China PR) on March 2, 2026 (tracker). On September 1, 2026 it found the duty absorbed and recommended raising it from US$2,998 to US$5,004 per metric ton (tracker).

DGTR asked for the new amount to apply from the government's notification, not from initiation (findings, paragraphs 64 to 66).

Can a court or tribunal reopen a DGTR case?

The Customs, Excise and Service Tax Appellate Tribunal (CESTAT) or a High Court can set aside DGTR's findings and send issues back to DGTR. On April 27, 2026, CESTAT set aside parts of DGTR's 2022 findings on semi-finished ophthalmic lenses from China PR, in two orders. DGTR took up the two remands on July 14 and August 14, 2026.

The August 14 remand covers the non-injurious price for five exporters given nil duty (remand notice, paragraphs 1 to 3; our summary). The July 14 remand covers one exporter group's own dumping margin (remand notice, paragraphs 1 and 2). Appeals are covered in after DGTR's final findings.

How long does each kind of anti-dumping review take?

The Anti-Dumping Rules set a length for each review. A sunset review runs 12 months and ends 3 months before the duty expires (rule 23). A mid-term review takes 12 months, a new shipper review 1 year plus 6 months (rule 22), and an anti-circumvention case 12 months, at most 18 (rule 26). These are targets, not promised dates.

Review time limits in the rules: the government's own targets, not a promise of a date

Review	Who asks	When to apply	How long	Rule
Sunset review	Indian industry, or DGTR	Normally at least 270 days before expiry	12 months, ending 3 months before expiry	Rule 23; Trade Notice 03/2021
Mid-term review	Any interested party, or DGTR	At least 1 year after the duty	12 months	Rule 23; Trade Notice 1/2010

New shipper review	A new, unrelated exporter	After commercial exports	1 year, plus 6 months	Rule 22; Trade Notice 01/2019
Anti-circumvention	Indian industry, or DGTR	While the duty runs	12 months, at most 18	Rule 26
Anti-absorption	Indian industry, another interested party, or DGTR	Normally within 2 years; not in the last 12 months	6 months, plus 3	Rules 29 and 30

How IndusDesk helps with reviews

For an Indian industry, we prepare review, anti-circumvention and anti-absorption applications and their evidence. For an exporter or importer, we prepare questionnaire responses, review applications and submissions. We support you through hearings and follow the case to its findings. The outcome is for DGTR and the government to decide.

Regulatory & trade advisory →

Every 2026 DGTR notice, in our DGTR tracker →

Talk to our desk about a sunset or mid-term review Message us on WhatsApp

Latest notices and insights

- Anti-dumping duty on decor paper from China extended to March 26, 2027 (Notice, September 22, 2026)
- Anti-dumping duty on untreated fumed silica from China extended to February 10, 2027 (Notice, July 31, 2026)
- Anti-dumping duty under Notification 51/2021-Customs (ADD) extended to December 15, 2026 (Notice, June 10, 2026)

- Provisional duty assessment for one Chinese exporter of anodized aluminum solar frames (Notice, May 19, 2026)

Frequently asked questions

How early must a sunset review be filed?

Normally at least 270 days before the duty expires, under Trade Notice No. 03/2021 (paragraph 4). DGTR considers a later application only for bona fide hardship shown with evidence.

Is duty charged on a new shipper during its review?

No anti-dumping duty is levied on its goods while the review runs (rule 22(2)). Imports may be provisionally assessed, and duty found due can run from the review's start.

What value addition counts as circumvention by assembly?

Assembly counts when it adds less than 35% of the manufacturing cost, uses parts from the country under duty, and began after, or just before, the original case (rule 25(2)(a)). Payments for patents, royalties, know-how and consultancy are left out of the value.

Sources

- Customs Tariff Act, 1975, section 9A(1A), (1B) and (5) (DGTR's Compendium of Laws & Regulations on Trade Remedies, updated up to June 16, 2026)
- Customs Tariff (Identification, Assessment and Collection of Anti-dumping Duty on Dumped Articles and for Determination of Injury) Rules, 1995: rules 2(c), 6(5), 22, 23, 25 to 27 and 29 to 31, read November 7, 2026 (the same compendium)
- Trade Notice No. 03/2021, April 12, 2021: timelines for sunset review investigations, paragraphs 4, 5 and 7 (DGTR's Compendium of Trade Notices, September 17, 2026)
- Trade Notice No. 02/2020, April 20, 2020: revised sunset timelines (180 and 120 days), withdrawn by Trade Notice 03/2021 (the same compendium)

- Trade Notice No. 1/2010, May 17, 2010: mid-term reviews, paragraphs 2 and 3 (the same compendium)
- Trade Notice No. 01/2019, January 29, 2019: new shipper reviews, paragraphs (a) to (f) (the same compendium)
- DGTR, Trade Remedial Measures: Frequently Asked Questions, question 39 (cited only to correct it)
- Notification No. 10/2026-Customs (ADD), June 10, 2026: duty under No. 51/2021-Customs (ADD) in force up to December 15, 2026 (PDF, 70 KB)
- Notification No. 19/2026-Customs (ADD), July 31, 2026: duty under No. 66/2021-Customs (ADD) in force up to February 10, 2027 (PDF, 201 KB)
- Notification No. 23/2026-Customs (ADD), September 22, 2026: duty under No. 77/2021-Customs (ADD) in force up to March 26, 2027 (PDF, 352 KB)
- Case No. AD(SSR-12/2025), sunset review final findings: aluminium foil from China PR, Indonesia, Malaysia and Thailand, September 14, 2026 (PDF, 3.3 MB)
- Case No. AD (SSR) - 02/2026, sunset review final findings: axles for trailers from China PR, October 22, 2026, paragraph 140 (PDF, 1.1 MB)
- Case No. AD (SSR)-05/2026, sunset review final findings: untreated fumed silica from China PR, November 6, 2026, paragraphs 4, 163 and 164 (PDF, 1.7 MB)
- SETU Case ID AD/SSR/010/2026, notice of October 15, 2026: decor paper review to conclude by December 25, 2026 (PDF, 10 KB)
- SETU Case No. AD(SSR)/012/2026, notice of November 6, 2026: scope of the ceramic tableware sunset review, paragraph 5 (PDF, 331 KB)
- Case No. AD (NSR)-03/2025, new shipper review initiation: Anhui Krant Aluminum Products Co., Ltd, March 20, 2026, paragraphs 6 and 7 (PDF, 866 KB)
- Notification No. 07/2026-Customs (ADD), May 19, 2026: provisional assessment during the new shipper review, paragraphs 1 to 3 (PDF, 92 KB)
- Case No. AD/AC/005/2026, anti-circumvention initiation: hydraulic rock breakers through Malaysia, September 28, 2026, paragraphs 12 and 15 (PDF, 755 KB)
- Notification No. 27/2026-Customs (ADD), November 5, 2026: provisional assessment of rock breakers exported from Malaysia (PDF, 712 KB)
- SETU Case ID AD/AC/006/2026, anti-circumvention initiation: CPVC resin through Malaysia, Japan and Thailand, September 16, 2026, paragraphs 11 and 14 (PDF, 1.4 MB)
- SETU Case ID AD/AC/006/2026, corrigendum of September 17, 2026: provisional assessment, paragraph 9A (PDF, 604 KB)
- F. No. 7/29/2026-DGTR, letter of November 5, 2026: CPVC questionnaire responses due December 2, 2026 (PDF, 112 KB)
- Case No. AD (AA)-01/2026, anti-absorption initiation: glufosinate from China PR, March 2, 2026 (PDF, 890 KB)

- Case No. AD (AA)-01/2026, anti-absorption final findings: glufosinate from China PR, September 1, 2026, paragraphs 64 to 66 (PDF, 1.2 MB)
- Case ID AD/AA/002/2026, remand proceeding notification: semi-finished ophthalmic lens from China PR, August 14, 2026, paragraphs 1 to 3 (CESTAT Final Order No. 50782/2026 of April 27, 2026) (PDF, 788 KB)
- Case ID AD/AA/001/2026, remand proceeding initiation: semi-finished ophthalmic lens from China PR, July 14, 2026, paragraphs 1 and 2 (CESTAT Final Order Nos. 50783 to 50793/2026 of April 27, 2026) (PDF, 702 KB)

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