SCN No.: 44/2026-27/COMM/N.S./Adjn./MCH

कार्यालय: प्रधान आयुक्त सीमा शुल्क, मुन्द्रा,
सीमा शुल्क भवन, मुन्द्रा बंदरगाह, कच्छ, गुजरात- **370421**
OFFICE OF THE PRINCIPAL COMMISSIONER/COMMISSIONER OF CUSTOMS, CUSTOM HOUSE, MUNDRA PORT, KUTCH, GUJARAT-370421
PHONE:02838-271426/271423 FAX:02838-271425
Email: adj-mundra@gov.in

F.No. GEN/ADJ/COMM/509/2026-Adjn

SHOW CAUSE NOTICE

(Under Section 28(4) read with Section 124 of the Customs Act, 1962)

1. **M/s**. **Saral Minerals & Chemicals India LLP** (IEC: **ADIFS6332G**) having registered address at 304, 3rd Floor Karamdham Complex, BPC Road, Vadodara Gujarat 390020 (hereinafter also referred to as '**Noticee No. 1')** had cleared goods "Titanium Dioxide Rutile" falling under CTH 3206 11, into domestic tariff area under DTA Sale Bill of Entries as per **ANNEXURE-A** from APSEZ Mundra warehousing unit **M/s. Indev Infra Private Limited (Formerly Known As Kerry Indev Logistics Private Limited)** ('**Noticee No. 2'**) having registered address at Survey No. 169/36, Dhrub Village Adani Ftwz, Mundra, Kachchh 370421 Gujarat India & **M/s. Steinweg Sharaf India Pvt Limited** ('**Noticee No. 3'**) having registered address at Survey No. 169/36 Village Dhrub, District Kutch, Gujarat Mundra 370 421 India through self-filing.

2. BACKGROUND OF THE ISSUE:

2.1 The Directorate General of Trade Remedies (DGTR), Department of Commerce, Government of India, conducted an anti-dumping investigation concerning imports of **"Natural Mica Based Pearl Industrial Pigments excluding cosmetic grade"** originating in or exported from China PR.

2.2 The Designated Authority, vide Final Findings File No. **6/8/2020-DGTR dated 08.06.2021**, concluded that the product under consideration was liable to anti-dumping measures. The product was described as chemically **titanium dioxide-coated mica-based pearlescent pigment**, commercially known as titanium dioxide or iron oxide coated mica pearl pigment/pearl lustre pigment/pearl pigment. The product was classified under Chapter 32, including sub-heading 3206 11.

2.3 Pursuant to the said findings, the Central Government issued **Notification No. 47/2021-Customs (ADD) dated 26.08.2021**, which was further amended vide Notification No. 13/2023-Customs (ADD) dated 22.11.2023, imposing definitive anti-dumping duty on imports of **"Natural Mica Based Pearl Industrial Pigments excluding cosmetic grade"** originating in or exported from China PR and imported into India.

3. During test check of the records of O/o the Specified Officer, APSEZ Mundra for the period April-2021 to March-2022, the Sr. Audit Officer (CRA) noticed that as per **Notification No. 47/2021-Customs (ADD) dated 26.08.2021** anti dumping duty is leviable on the goods mentioned in the ANNUXRE-A cleared through Mundra SEZ unit **M/s. Indev Infra Private Limited & M/s. Steinweg Sharaf India Pvt Limited** imported from China, under CTH 3206 11 in DTA and paid duty @ 30.98% (BCD 10% + SWS 10%+ IGST 18%). The subject para was raised on the basis of observation that-

> *"Natural mica pearl pigment series are classic effect pigment, which consist of treated natural mica flakes coated with a thin layer of metal oxide, such as titanium oxide, iron oxide. Through a combination of transparency, refraction, multiple reflections, particle size and coating thickness, a wide variety of color effects are produced. Pearlescent pigment with titanium dioxide coating can get special color by light interference phenomenon. Further, as per DGTR F.No. 06/08/2020-DGTR, the present investigation is "Natural Mica Based Pearl industrial pigments excluding cosmetic grade". The PUC is chemically titanium dioxide coated micananeous and lustrous pearlescent and is commercially known in the marketplace as Titanium Dioxide or Iron Oxide coated Mica Pearl Pigment or Pearl Lustrous Pigments or Pearl Pigments."*

3.2 It is observed that the audit objection/para pertaining to the subject matter was raised in respect of the period 2021-22. However, since the issue involved in the said audit para is of a continuing nature and the same had persisted during the subsequent period, the records/documents pertaining to the period 2022-23, 2023-24, 2024-25 and up to May 2025 have also been examined for the purpose of determining the correct liability under the provisions of the Customs Act, 1962 and the applicable notifications/rules.

3.3 Accordingly, the present Show Cause Notice is being issued in respect of the aforesaid subsequent period as well, based on the facts and evidence available on record and the independent verification undertaken for the respective period.

3.4 As per the **Notification No. 47/2021-Customs (ADD) dated 26.08.2021** which was further amended vide Notification No. 13/2023-Customs (ADD) dated 22.11.2023 anti-dumping duty is applicable on imports of **"Natural Mica Based Pearl Industrial Pigments excluding cosmetic grade"** originating in or exported from China PR and imported into India. CERA officials inferred the product imported as "**Natural Mica Based Pearl Industrial Pigments excluding cosmetic grade**" attracting Anti-dumping duty during April-21 to May-25 under 142 DTA Clearances. Audit checked all these DTA Clearances and found Non levy of Antidumping duty in all these clearances resulting in short-levy of **Rs. 2,04,47,15,210/-** (ADD amount + applicable IGST @18%) which is recoverable along with applicable interest under Section 28 of the Customs Act, 1962.

3.5 Notification No. 47/2021-Customs (ADD) dated 26.08.2021 is reproduced below for ready reference:

[TO BE PUBLISHED IN THE GAZETTE OF INDIA, EXTRAORDINARY, PART II, SECTION 3, SUB-SECTION (i)]

GOVERNMENT OF INDIA
MINISTRY OF FINANCE
(DEPARTMENT OF REVENUE)

Notification No. 47/2021 -Customs (ADD)

New Delhi, the 26th August, 2021

G.S.R.---(E).- – Whereas, in the matter of "Natural Mica based Pearl Industrial Pigments excluding cosmetic grade" (hereinafter referred to as the subject goods), falling under tariff sub-heading 3206 11 of the First Schedule to the Customs Tariff Act, 1975 (51 of 1975) (hereinafter referred to as the Customs Tariff Act), originating in, or exported from the China PR (hereinafter referred to as the subject country) and imported into India, the designated authority in its final findings *vide* notification File No. 6/8/2020-DGTR, dated the 8th June, 2021, published in the Gazette of India, Extraordinary, Part I, Section 1, dated the 8th June, 2021, has come to the conclusion that-

(i) the product under consideration has been exported at a price below normal value, thus resulting in dumping;
(ii) the domestic industry has suffered material injury;
(iii) there is causal link between dumping of product under consideration and injury to the domestic industry, and has recommended imposition of anti-dumping duty on imports of the subject goods, originating in, or exported from the subject countries and imported into India, in order to remove injury to the domestic industry.

Now, therefore, in exercise of the powers conferred by sub-sections (1) and (5) of section 9A of the Customs Tariff Act, read with rules 18 and 20 of the Customs Tariff (Identification, Assessment and Collection of Anti-dumping Duty on Dumped Articles and for Determination of Injury) Rules, 1995, the Central Government, after considering the aforesaid final findings of the designated authority, hereby imposes on the subject goods, the description of which is specified in column (3) of the Table below, falling under the tariff heading of the First Schedule to the Customs Tariff Act as specified in the corresponding entry in column (2), originating in the countries as specified in the corresponding entry in column (4), exported from the countries as specified in the corresponding entry in column (5), produced by the producers as specified in the corresponding entry in column (6), and imported into India, an anti-dumping duty at the rate equal to the amount as specified in the corresponding entry in column (7), in the currency as specified in the corresponding entry in column (9) and as per unit of measurement as specified in the corresponding entry in column (8) of the said Table, namely :-

TABLE

S.No.	**Sub-heading**	**Description**	**Country of origin**	**Country of export**	**Producer**	**Amount**	**Unit**	**Currency**
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
1.	320611	Natural Mica based Pearl Industrial Pigments excluding cosmetic grade	China PR	Any country including China PR	Nanyang Lingbao Pearl Pigment Company Limited Materials	2493	MT	USD
2.	-do-	-do-	China PR	Any country including China PR	Rika Technology Company Limited	2023	MT	USD

3.	-do-	-do-	China PR	Any country including China PR	Guangxi Chesir Pearl Material Company Limited	2813	MT	USD
4.	-do-	-do-	China PR	Any country including China PR	Zhejiang Ruicheng New Material Company Limited	2674	MT	USD
5.	-do-	-do-	China PR	Any country including China PR	Fujian Kuncai Material Technology Company Limited	214	MT	USD
6.	-do-	-do-	China PR	Any country including China PR	Hebei Oxen New Materials Co., Ltd.	2406	MT	USD
7.	-do-	-do-	China PR	Any country including China PR	Any producer other than serial no 1 to 6	5529	MT	USD
8.	-do-	-do-	Any country other than China PR	China PR	Any producer	5529	MT	USD

2. The anti-dumping duty imposed under this notification shall be levied for a period of five years (unless revoked, superseded or amended earlier) from the date of publication of this notification in the Official Gazette and shall be payable in Indian currency.

Explanation.- For the purposes of this notification, rate of exchange applicable for the purpose of calculation of such anti-dumping duty shall be the rate which is specified in the notification of the Government of India, in the Ministry of Finance (Department of Revenue), issued from time to time, in exercise of the powers conferred by section 14 of the Customs Act, 1962 (52 of 1962), and the relevant date for the determination of the rate of exchange shall be the date of presentation of the bill of entry under section 46 of the said Customs Act.

[F. No. CBIC-190354/148/2021-TRU Section-CBEC]

(Rajeev Ranjan)
Under Secretary to the Government of India

SCN No.: 44/2026-27/COMM/N.S./Adjn./MCH

[TO BE PUBLISHED IN THE GAZETTE OF INDIA, EXTRAORDINARY, PART II, SECTION 3, SUB-SECTION (i)]

GOVERNMENT OF INDIA
MINISTRY OF FINANCE
(DEPARTMENT OF REVENUE)

Notification No. 13/2023 -Customs (ADD)

New Delhi, the 22nd November, 2023

G.S.R.---(E).-Whereas, the designated authority *vide* initiation notification number 7/17/2022-DGTR, dated the 30th September, 2022, published in the Gazette of India, Extraordinary, Part I, Section 1, dated the 30th September, 2022, had initiated review under sub-section (5) of section 9A of the Customs Tariff Act, 1975 (51 of 1975) (hereinafter referred to as the Customs Tariff Act) read with rule 23 of the Customs Tariff (Identification, Assessment and Collection of Anti-dumping Duty on Dumped Articles and for Determination of Injury) Rules, 1995 (hereinafter referred to as the said rules), regarding the need for redetermination of duty in the matter of anti-dumping duty imposed on imports of 'Natural mica-based pearl industrial pigments excluding cosmetic grade' (hereinafter referred to as the subject goods) originating in or exported from China PR (hereinafter referred to as the subject country) *vide* notification of the Government of India, in the Ministry of Finance (Department of Revenue) No. 47/2021 – Customs (ADD), dated the 26th August, 2021, published in the Gazette of India, Extraordinary, Part II, Section 3, Sub-section (i), *vide* number G.S.R. 590(E), dated the 26th August, 2021;

And whereas, the designated authority in its final findings in the mid-term review *vide* notification No. 7/17/2022-DGTR, dated the 27th September, 2023, published in the Gazette of India, Extraordinary, Part I, Section 1, dated the 27th September, 2023, has recommended modification of existing duty table in notification of the Government of India, in the Ministry of Finance (Department of Revenue) No. 47/2021 – Customs (ADD), dated the 26th August, 2021, published in the Gazette of India, Extraordinary, Part II, Section 3, Sub-section (i), *vide* number G.S.R. 590(E), dated the 26th August, 2021;

Now, therefore, in exercise of the powers conferred by sub-sections (1) and (5) of section 9A of the Customs Tariff Act, read with rules 18 and 23 of the said rules, the Central Government hereby makes the following further amendment in the notification of the Government of India, in the Ministry of Finance (Department of Revenue) No. 47/2021 – Customs (ADD), dated the 26th August, 2021, published in the Gazette of India, Extraordinary, Part II, Section 3, Sub-section (i), *vide* number G.S.R. 590(E), dated the 26th August, 2021, namely:-

In the said notification, for the Table, the following shall be substituted, namely: -

"Table

SN	Tariff Item	Description	Country of Origin	Country of Export	Producer	Amount	Unit	Currency
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
1	32064990, 32061900, 32041759, 32041739, 32041720, 32041790, 32071040,	Natural Mica based Pearl Industrial Pigments excluding cosmetic grade	China PR	Any country including China PR	Fujian Kuncai Material Technology Company Limited	299	Per MT	US$

	32061110, 32061190							
2	-do-	-do-	China PR	Any country including China PR	Zhejiang Coloray Technology Development Co., Ltd.	2913	Per MT	US$
3	-do-	-do-	China PR	Any country including China PR	Henan Lingbao New Materials Technology Co., Ltd	2353	Per MT	US$
4	-do-	-do-	China PR	Any country including China PR	Any producer other than serial no 1 to 3	3144	Per MT	US$
5	-do-	-do-	Any country other than China PR	China PR	Any Producer	3144	Per MT	US$".

[F. No. CBIC-190354/148/2021-TRU]

(Nitish Karnatak)
Under Secretary to the Government of India.

Note:- The principal notification No. 47/2021-Customs (ADD), dated the 26th August, 2021, published in the Gazette of India, Extraordinary, Part II, Section 3, Sub-section (i), *vide* number G.S.R. 590(E), dated the 26th August, 2021 and last amended *vide* notification No. 70/2021-Customs (ADD), dated the 17th December, 2021, published in the Gazette of India, Extraordinary, Part II, Section 3, Sub-section (i) *vide* number G.S.R. 863(E), dated the 17th December, 2021.

It is submitted that the goods declared as "Titanium Dioxide Rutile" by the Noticee, being in fact Natural Mica based Pearl Industrial Pigments (excluding cosmetic grade) falling under CTH 3206 11, originating in and/or exported from China PR, are squarely covered under Sl. No. 07 of **Notification No. 47/2021-Customs (ADD) dated 26.08.2021**, attracting Anti-Dumping Duty @ US$ 5529 per MT and under Sl. No. 04 of Notification No. 13/2023-Customs (ADD) dated 22.11.2023, attracting Anti-Dumping Duty @ US$ 3144 per MT .

4. Whereas, on the basis of audit observation which then converted into para 01 of LAR-19/2022-23 **(RUD-1),** letters F.No. APSEZ/77/CERA Audit-SO Office/2022-23 dated 03.04.2023 **(RUD-2)** were issued to the warehousing unit.

4.1 In reference to letter F.No. APSEZ/77/CERA Audit-SO Office/2022-23 dated 03.04.2023 the importer i.e. **M/s**. **Saral Minerals & Chemicals India LLP** (Noticee No. 1) made written submission stating that "As per Notification No. 47/2021-Customs (ADD) dated 26.08.2021, Anti Dumping Duty is applicable on Natural Mica based Pearl Industrial Pigments (excluding Cosmetic grade). Natural Mica Based Pearl industrial pigments and Titanium

Dioxide (TiO_2) are two different types of pigments and they have different properties and characteristics."

4.2 Hence, they refuted the claim of addition of Anti Dumping duty on Titanium Oxide. However, the importer failed to produce any supporting document viz the product literature, commercial documents, technical literature, invoice/packing list, certificate of analysis and/or other documents available on record to counter point raised by CERA. The reply submitted by the importer was forwarded to CERA Audit Ahmedabad, but the same was not considered by the CERA officials. The reply submitted by the importer has been annexed herewith as **RUD-3.**

5. Whereas, as per Serial Number 07 of Notification No. 47/2021-Customs (ADD) dated 26.08.2021, antidumping duty is leviable @**US$ 5529 per MTS and** as per Serial No. 4 of Notification No. 13/2023- Customs (ADD) dated 22.11.2023 @ **US$ 3144 per MTS (22.11.2023 onwards)** on Natural Mica based Pearl Industrial Pigments (excluding Cosmetic grade)* falling under CTH 3206 11 which is 'originating in' and 'exported from' China and imported into India.

5.1 The DTA client i.e. **M/s**. **Saral Minerals & Chemicals India LLP** who cleared the goods "Titanium Dioxide Rutile" falling under CTH 3206 11 which are ultimately Natural Mica based Pearl Industrial Pigments (excluding Cosmetic grade) and falling in the purview of anti-dumping duty, has short-paid anti-dumping duty along with applicable IGST of **Rs. 2,04,47,15,210/-** as calculated and attached with this notice as **ANNEXURE-A (RUD-4)**

6.1 Whereas, the relevant provisions to clear the goods into DTA from SEZ unit are Section 30 of the SEZ Act, 2005, Rule 47 and 48 of the SEZ Rules, 2006.

30. Subject to the conditions specified in the rules made by the Central Government in this behalf:-

(a) any goods removed from a Special Economic Zone to the Domestic Tariff Area shall be chargeable to duties of customs including antidumping, countervailing and safeguard duties under the Customs Tariff Act, 1975, where applicable, as leviable on such goods when imported; and

(b) the rate of duty and tariff valuation, if any, applicable to goods removed from a Special Economic Zone shall be at the rate and tariff

valuation in force as on the date of such removal, and where such date is not ascertainable, on the date of payment of duty.

47. Sales in Domestic Tariff Area.-
(1)………….
………….
(4) Valuation and assessment of the goods cleared into Domestic Tariff Area shall be made in accordance with Customs Act and rules made there under.

48. Procedure for Sale in Domestic Tariff Area.-

(1) Domestic Tariff Area buyer shall file Bill of Entry for home consumption giving therein complete description of the goods and/or services namely, make and model number and serial number and specification along with invoice and packing list with the Authorised Officers:

Provided that the Bill of Entry for home consumption may also be filed by a Unit on the basis of authorization from a Domestic Tariff Area buyer.

6.2 Relevant Legal Provisions of the Customs Act, 1962:-
Section 17. Assessment of duty.—
(1) An importer entering any imported goods under section 46 ... shall, save as otherwise provided in section 85, self-assess the duty, if any, leviable on such goods.

(2) The proper officer may verify the entries made under section 46 or section 50 and the self-assessment of goods referred to in sub-section (1) and for this purpose, examine or test any imported goods or export goods or such part thereof as may be necessary.
[Provided that the selection of cases for verification shall primarily be on the basis of risk evaluation through appropriate selection criteria.]

(3) For the purposes of verification under sub-section (2), the proper officer may require the importer, exporter or any other person to produce any document or information, whereby the duty leviable on the imported goods or export goods, as the case may be, can be ascertained and thereupon, the importer, exporter or such other person shall produce such document or furnish such information.

(4) Where it is found on verification, examination or testing of the goods or otherwise that the self-assessment is not done correctly, the proper officer may, without prejudice to any other action which may be taken under this Act, re-assess the duty leviable on such goods.

Section 28: Recovery of duties not levied or not paid or short-levied or short-paid or erroneously refunded—

(4) Where any duty has not been levied or not paid or has been short-levied or short-paid or erroneously refunded, or interest payable has not been paid, part-paid or erroneously refunded, by reason of— (a) collusion; or (b) any wilful mis-statement; or (c) suppression of facts, by the importer or the exporter or the agent or employee of the importer or exporter, the proper officer shall, within five years from the relevant date, serve notice on the person chargeable with duty or interest ... requiring him to show cause why he should not pay the amount specified in the notice.

Section 28AA. Interest on delayed payment of duty.—

(1) The person who is liable to pay duty in accordance with the provisions of section 28 shall, in addition to such duty, be liable to pay interest, if any, at the rate fixed under sub-section (2) ...

Section 46. Entry of goods on importation.—

…………

(4) The importer while presenting a bill of entry shall make and subscribe to a declaration as to the truth of the contents of such bill of entry and shall, in support of such declaration, produce to the proper officer the invoice and such other documents relating to the imported goods as may be prescribed.

(4A) The importer who presents a bill of entry shall ensure the following, namely:— (a) the accuracy and completeness of the information given therein; (b) the authenticity and validity of any document supporting it; and (c) compliance with the restriction or prohibition, if any, relating to the goods under this Act or under any other law for the time being in force.

Section 111. Confiscation of improperly imported goods, etc.

- The following goods brought from a place outside India shall be liable to confiscation:-

(a)………….

(m) any goods which do not correspond in respect of value or in any other particular] with the entry made under this Act or in the case of baggage with the declaration made under section 77 [in respect thereof, or in the case of goods under transhipment, with the declaration for transhipment referred to in the proviso to sub-section (1) of section 54]

114A. Penalty for short-levy or non-levy of duty in certain cases.
- Where the duty has not been levied or has been short-levied or the interest has not been charged or paid or has been part paid or the duty or interest has been erroneously refunded by reason of collusion or any wilful mis-statement or suppression of facts, the person who is liable to pay the duty or interest, as the case may be, as determined under sub-section (2) of section 28 shall also be liable to pay a penalty equal to the duty or interest so determined

114AA. [Penalty for use of false and incorrect material:
- If a person knowingly or intentionally makes, signs or uses, or causes to be made, signed or used, any declaration, statement or document which is false or incorrect in any material particular, in the transaction of any business for the purposes of this Act, shall be liable to a penalty not exceeding five times the value of goods.]

Section 117. Penalties for contravention, etc., not expressly mentioned. -

Any person who contravenes any provision of this Act or abets any such contravention or who fails to comply with any provision of this Act with which it was his duty to comply, where no express penalty is elsewhere provided for such contravention or failure, shall be liable to a penalty not exceeding [1] [four lakh rupees].

7. Further, section 17 of the Customs Act, 1962 provides for self-assessment of duty on imported and export goods by the importer and exporter himself by filing a bill of entry or shipping bill, as the case may be. Under self-assessment, the importer or exporter has to ensure correct classification, applicable rate of duty, value and exemption notifications, if any, in respect of imported /export goods while presenting bill of entry or shipping bill. Moreover, Rule 75 of the SEZ Rules, 2006 also provides that unless and otherwise specified in these rules, all inward or outward movements of the goods into or from SEZ by the Unit/Developer shall be based on self-declaration made by the Unit/Developer. While clearing subject goods, DTA clients and warehousing units were bound to declare correct declaration and assessment. From the above, it is evident that Noticee No. 1 to Noticee No. 3 suppressed the true facts and cleared goods without paying anti-dumping duty with a motive to evade Customs duty alongwith the applicable IGST to the tune of **Rs. 2,04,47,15,210/-**

8. Whereas, Section 46(4A) of the Customs Act, 1962, the importer, who is presenting the bill of entry should ensure the accuracy and completeness of the information given therein, the authenticity and validity of any document supporting it; and compliance with the restriction or prohibition, if any, relating to the goods under the Customs Act, 1962 or under any other law for the time being in force. Apparently, it appears that the Noticee No. 1 to Noticee No. 3 filed Bill of entries with incorrect / false particulars, and have violated the provisions of section 46(4A) by way of not declaring and not paying applicable anti-dumping duty and thereby not self-assessed the Bill of Entries correctly. Such indulgence and endeavour on their part are in violation of the provisions of Section 46 of the Customs Act, 1962, which makes the impugned goods, having assessable value of **Rs. 79,76,92,370/-** (Rupees Seventy Nine Crore Seventy Six Lakh Ninety Two Thousand Three Hundred and Seventy Only) liable for confiscation in terms of Section 111(m) of the Customs Act, 1962 as the goods which were cleared into DTA do not correspond to applicable anti-dumping duty and thereby appears to be treated as improperly imported goods. Therefore, **Rs. 2,04,47,15,210/-** the amount of short-levied duty appears recoverable under Section 28(4) of the Customs Act, 1962 along with applicable interest under Section 28AA of the Customs Act, 1962 from Noticee No. 1. Hence, it appears that Noticee No. 1 is liable for penalty under section 114A of the Customs Act, 1962 and Noticee No. 2 and Noticee No. 3 are liable for penalty under section 117 of the Customs Act, 1962

9.1 Whereas, Section 28(4) of the Customs Act, 1962 permits recovery of duty short-levied within an extended period of five years from the relevant date, where such short-levy has occurred by reason of collusion, wilful mis-statement, or suppression of facts by the importer with an intent to evade payment of duty. In the present case, it appears that Noticee No. 1 at the time of presenting the Bills of Entry in question, self-assessed and declared the goods as "Titanium Dioxide Rutile" under CTH 3206 11, and paid duty only @ 30.98% (BCD + SWS + IGST), without disclosing or discharging the Anti-Dumping Duty leviable under Notification No. 47/2021-Customs (ADD) dated 26.08.2021 and Notification No. 13/2023- Customs (ADD) dated 22.11.2023, notwithstanding that the said Notification, based on DGTR Final Findings dated 08.06.2021, had already come into force with effect from 26.08.2021 and was squarely applicable to the goods so imported/cleared.

9.2 That the said non-declaration amounts to wilful mis-statement/suppression of facts, and not mere inadvertence, is evidenced by the following facts, each of which independently points to the same conclusion:

(i) The subject goods, being chemically Titanium Dioxide coated micaceous and lustrous pearlescent pigment, are commercially known in the marketplace, and to persons dealing in such goods, as "Titanium Dioxide" or "Iron Oxide coated Mica Pearl Pigment" — the very identity that the DGTR investigation and the impugned Notification address; the Noticee, being regular importers/dealers of the said commodity, cannot be heard to say that they were unaware of the applicability of the anti-dumping levy to goods answering this description.

(ii) The Notification No. 47/2021-Customs (ADD) dated 26.08.2021 and Notification No. 13/2023- Customs (ADD) dated 22.11.2023 is a public document, published in the Gazette of India, and is deemed to be within the knowledge of all persons dealing in the subject goods; despite this, the Noticee continued to clear successive consignments over a long period (September 2021 to May 2025) declaring the goods as plain "Titanium Dioxide", without at any point declaring or seeking a ruling on the applicability of the ADD Notification.

(iii) On the discrepancy being pointed out, Noticee No. 1 (**M/s**. **Saral Minerals & Chemicals India LLP**) submitted their reply and same were forwarded to CERA Audit Ahmedabad, but the same was not considered by the CERA officials.

9.3 The above facts, taken cumulatively, rule out inadvertence, clerical error, or bona fide interpretational difficulty as an explanation, and indicate a deliberate and consistent pattern of non-declaration of Anti-Dumping Duty liability with the intent to evade payment of duty lawfully due to the exchequer.

9.4 Accordingly, the extended period of five years under Section 28(4) of the Customs Act, 1962 is rightly invocable in the present case, and the Anti-Dumping Duty alongwith applicable IGST short-levied/not levied, amounting to **Rs. 2,04,47,15,210/-** (Rupees Two Hundred and Four Crore Forty Seven Lakh Fifteen Thousand Two Hundred and Ten only) is recoverable from **M/s**. **Saral Minerals & Chemicals India LLP** under Section 28(4) along with applicable interest under Section 28AA of the Customs Act, 1962.

10. Whereas, it appears that by declaring false information and wilful mis-statement while filing bill of entry and thereby evading customs duty, the Noticee No. 1 i.e **M/s**. **Saral Minerals & Chemicals India LLP** being liable to pay duty as discussed at Para 9.1 to 9.4 above, is also liable to be penalized under Section 112 and/or 114A of the Customs Act, 1962.

11. Whereas, Section 114AA of the Customs Act, 1962 provides that if any person knowingly or intentionally makes, signs or uses, or causes to be made, signed or used, any declaration, statement or document which is false or incorrect in any material particular, in the transaction of any business for the purposes of this Act, such person shall be liable to a penalty not exceeding five times the value of the goods. In the present case, DTA client (and warehousing unit) filed Bills of Entry declaring the goods as "Titanium Dioxide Rutile" under CTH 3206 11, whereas the goods, being Natural Mica based Pearl Industrial Pigment (excluding cosmetic grade), were liable to Anti-Dumping Duty under Notification No. 47/2021-Customs (ADD) dated 26.08.2021 and Notification No. 13/2023- Customs (ADD) dated 22.11.2023; the declaration made in the Bills of Entry as to the description/classification of the goods, and the consequent omission to declare ADD liability, is thus false and incorrect in a material particular within the meaning of Section 114AA. That the said false declaration was made knowingly and intentionally, and not on account of any bona fide error, stands established from the facts already discussed in para 9.2, above — namely, (i) the commercial identity of the goods as Titanium Dioxide/Mica Pearl Pigment being within the knowledge of persons regularly dealing in the trade; (ii) the ADD Notification being a public document in force since 26.08.2021, applicable throughout the period of clearances (September 2021 to May 2025); and (iii) The false declaration was made repeatedly made across 142 Bills of Entry from September 2021 to May 2025, resulting in evasion of Anti-Dumping Duty along with applicable IGST @ 18% amounting to **Rs. 2,04,47,15,210/-** (Rupees Two Hundred and Four Crore Forty Seven Lakh Fifteen Thousand Two Hundred and Ten only). Given the sustained and repetitive nature of the false declarations, and the quantum of duty evasion involved, the conduct of the Noticee warrants imposition of penalty under Section 114AA of the Customs Act, 1962, commensurate with the gravity of the offence. Accordingly, Noticee No. 1 i.e **M/s**. **Saral Minerals & Chemicals India LLP** appear liable to penalty under Section 114AA of the Customs Act, 1962.

11.1 Further, Section 17 of the Customs Act, 1962 provides for self-assessment of duty on imported and export goods by the importer and exporter himself by filing a bill of entry or shipping bill, as the case may be. Under self-assessment, the importer or exporter has to ensure correct classification, applicable rate of duty, value and exemption notifications, if any, in respect of imported /export goods while presenting bill of entry or shipping bill. Further, Rule 75 of the SEZ Rules, 2006 also provides that unless and otherwise specified in these rules, all inward or outward movements of the goods into or from SEZ by the Unit/Developer shall be based on self-declaration made by the Unit/Developer. While clearing subject goods, DTA clients and warehousing units were bound to true and correct declaration and assessment. However, DTA client and warehousing unit made incorrect self assessment, resulting in evasion of Anti-Dumping Duty along with applicable IGST @ 18% amounting to **Rs. 2,04,47,15,210/-** (Rupees Two Hundred and Four Crore Forty Seven Lakh Fifteen Thousand Two Hundred and Ten only). Therefore, it is evident that Noticee No. 2 & Noticee No. 3 appears liable to penalty under Section 117 of the Customs Act, 1962

12. Whereas, SEZ units were authorized to hold the goods on behalf of DTA clients and as provided in terms of Rule 47(5) of the SEZ Rules, 2006 that Adjudication with regard to matters relating to authorised operations under Special Economic Zones Act, 2005, transactions, and goods and services related thereto, shall be made by the Jurisdictional Customs and Central Excise or GST Authorities in accordance with the relevant provisions contained in the Customs Act, 1962, the Central Excise Act, 1944, and the Finance Act, 1994 and the rules made there under or the notifications issued there under.

Rule 47: Sales in Domestic Tariff Area.-

(5) Refund, Demand, Adjudication, Review and Appeal with regard to matters relating to authorised operations under Special Economic Zones Act, 2005, transactions, and goods and services related thereto, shall be made by the Jurisdictional Customs and Central Excise Authorities in accordance with the relevant provisions contained in the Customs Act, 1962, the Central Excise Act, 1944, and the Finance Act, 1994 and the rules made there under or the notifications issued there under.

13. Now, therefore, DTA client **M/s**. **Saral Minerals & Chemicals India LLP** is hereby called upon to Show Cause to the Commissioner of Customs, Custom House Mundra, having his office situated at 1st Floor, Customs House, Mundra, Port User Building, Mundra, Kutch within 30 days from the receipt this notice as to why:-

(i) Goods declared as “Titanium Dioxide Rutile” falling under CTH 3206 11 cleared from SEZ Unit to Domestic Tariff Area as detailed in ANNEXURE-A attached having total assessable value of **Rs. 79,76,92,370/-** (Rupees Seventy Nine Crore Seventy Six Lakh Ninety Two Thousand Three

Hundred and Seventy Only) should not be held liable for confiscation under Section 111(m) of the Customs Act, 1962.

(ii) Customs Duty in form of Anti-Dumping Duty alongwith with applicable IGST @ 18% amounting to **Rs. 2,04,47,15,210/-** (Rupees Two Hundred and Four Crore Forty Seven Lakh Fifteen Thousand Two Hundred and Ten only) should not be demanded and recovered from **M/s**. **Saral Minerals & Chemicals India LLP** under Section 28(4) of the Customs Act, 1962 along with applicable interest under Section 28AA of the Customs Act, 1962 ibid.

(iii) Penalty under Section 112 and/or 114A of the Customs Act, 1962 should not be imposed upon **M/s**. **Saral Minerals & Chemicals India LLP** for short-payment of Customs Duty.

(iv) Penalty under Section 114AA of the Customs Act, 1962 should not be imposed on **M/s**. **Saral Minerals & Chemicals India LLP** for producing false particulars in Bill of Entries.

13.1 Now, therefore, SEZ warehousing units **M/s. Indev Infra Private Limited & M/s. Steinweg Sharaf India Pvt Limited** are hereby called upon to Show Cause to the Commissioner of Customs, Custom House Mundra, having his office situated at 1st Floor, Customs House, Mundra, Port User Building, Mundra, Kutch within 30 days from the receipt this notice as to why the penalty under Section 117 of the Customs Act, 1962 should not be imposed on them for their improper importation of goods having total assessable value of **Rs. 79,76,92,370/-** (Rupees Seventy Nine Crore Seventy Six Lakh Ninety Two Thousand Three Hundred and Seventy Only).

14. Each of the above Noticees are required to submit their reply in writing to the Adjudicating Authority, as above, within 30 days from the date of receipt of this notice. In their written reply, the Noticees may also state as to whether they would like to be heard in person. In case, no reply is received within the time limit stipulated above or any further time which may be granted to them by the Adjudicating Authority and/or if they fail to appear for personal hearing, when the case is posted for the same, the case will be decided ex-parte on the basis of evidence on record and without any further reference to the Noticee(s). Further, the Noticees are advised to mention their email address in writing for virtual hearing as per CBIC’s Instruction dated 21.08.2020 issued vide F.No. 390/Misc/3/2019-JC.

15. This notice is issued without prejudice to any other action that may be taken in respect of the above goods and / or the persons / firms mentioned in the notice under the provisions of the Customs Act, 1962 and / or any other law for the time being in force, in the Republic of India.

16. The department reserves the right to add, amend, modify, delete any part or the portion of this notice any such addendum, amendment, modification, deletion, if made, shall be deemed to be part and parcel of this notice.

17. The list of relied upon documents (RUDs) in this case is as per Annexure-B.

Digitally signed by
Nitin Saini
Date: 10-09-2026
18:06:43

(**Nitin Saini**)
Commissioner of Customs,
Custom House, Mundra

F.No. GEN/ADJ/COMM/509/2026-Adjn

To, Noticee

1. **M/s**. **Saral Minerals & Chemicals India LLP** (IEC: **ADIFS6332G**) 304, 3rd Floor Karamdham Complex, BPC Road, Vadodara Gujarat
2. **M/s. Indev Infra Private Limited (Formerly Known As Kerry Indev Logistics Private Limited)** Survey No. 169/36, Dhrub Village Adani Ftwz, Mundra, Kachchh 370421 Gujarat India.
3. **M/s. Steinweg Sharaf India Pvt Limited** Survey No. 169/36 Village Dhrub, District Kutch, Gujarat Mundra 370 421

Copy to:

1. The Specified officer, APSEZ Mundra
2. Deputy Commissioner/Assistant Commissioner (EDI), Customs House, Mundra with request to upload the Notice in Official Website.
3. Guard File
4. Notice Board

ANNEXURE-B

(List of Relied Upon Documents)

RUD-1: Copy of LAR dated 28.04.2023.
RUD-2: Letter issued to the Warehousing Unit
RUD-3: Reply submitted by the Importer.
RUD-4: Calculation Sheet in form of **ANNEXURE-A**

Part II – Audit findings

Part-II (A): Major Irregularities

Reference Number: OBS-640880

Para-1: Non levy of Anti-Dumping Duty.

As per Anti-Dumping Duty Notification No. 47/2021-Customs (ADD) dated 26.08.2021 antidumping duty is leviable on "Natural Mica based Pearl Industrial Pigments excluding cosmetic grade" falling under CTH 320611 originating in or exported from China as follows

Sl.No.	Discerption of Goods	Producer	Amount in Us$ per MT.
1	Natural mica based Pearl Industrial Pigments excluding cosmetic grade	Nanyang Lingbao Pearl Pigment Company Limited Materials	2493
2		Rika Technology Company Limited	2023
3		Guangxi Chesir Pearl Material Company Limited	2813
4		Zhejiang Ruicheng New Material Company Limited	2674
5		Fujian Kuncai Material Technology Company Limited	214
6		Hebei Oxen New Materials Co., Ltd.	2406
7		Any producer other than serial no 1 to 6	5529
8		Any producer	5529

Import of item "Titanium Dioxide" falling under CTH 320611, valued at ` 95.45 Crore, was made during April-21 to March-22, through Specified Officer, APSEZ, Mundra, under 127 DTA Clearances (129 items). Audit checked all these DTA Clearances and found non-levy of Anti-Dumping duty in 73 DTA Clearances having assessable value of ₹ 60.02 crore.

Nature mica pearl pigment series are classic effect pigment, which consists of treated natural mica flakes coated with a thin layer of metal oxide, such as titanium dioxide, iron oxide. Through a combination of transparency, refraction, multiple reflections, particle size and coating thickness, a wide variety of colour effects are produced. Pearlescent pigment with titanium dioxide coating can get special colour by light interference phenomenon

https://www.yortay.com/natural_pigments/.
Further ,as per DGTR F.No. 06/08/2020-DGTR, the present investigation is "Natural Mica based Pearl Industrial Pigments excluding cosmetic grade". The PUC is chemically titanium Dioxide coated micananeous and lustrous pearlescent pigment and is commercially known

in the marketplace as Titanium Dioxide or Iron Oxide coated Mica Pearl Pigment or Pearl Lustrous Pigments or Pearl Pigments.

During test check of records of Specified Officer, APSEZ, Mundra, for the period April-2021 to March-2022, it was noticed that two importers had cleared “Titanium Dioxide”, imported from China in DTA, on which duty was levied @ 30.98 percent ((BCD 10%+SWS 10%+ IGST 18%).

As per Sl. No. 8 of above notification, Anti-dumping duty @ US$ 5529 per MT was required to be levied on Cleared goods of “Titanium Dioxide.” Further, corresponding IGST on levy of antidumping duty was also required to be levied.

This has resulted in short Levy of duty of ₹128,67,07,973/- **(Statement).**

On this being pointed out, it was replied that the matter would be examined, and reply would be submitted in due course.
Further reply is awaited.

S.No.	IMPORTER NAME	IEC CODE	DTA Sale Bill of Entry No.	REQUEST ASSESSMENT DATE	SEZ Warehousing Unit	CTH NO.	ITEM DESCRIPTION	ASSESSABLE VALUE FOR THE ITEM IN INR	DUTY PAID AMOUNT	COUNTRY OF ORIGIN	EXCHANGE RATE	QUANTITY (IN MTS)	ADD levy @ US$ 5529 MT	IGST on ADD @ 18%	Short levy of Duty
1	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2009575	27-Sep-21	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	4632320	1386990.73	China	76.05	22	9250570	1665103	10915672
2	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2009622	27-Sep-21	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	4632320	1386990.73	China	76.05	22	9250570	1665103	10915672
3	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2009893	01-Oct-21	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	4632320	1386990.73	China	76.05	22	9250570	1665103	10915672
4	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2010767	21-Oct-21	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	8893236	2662777.15	China	76.05	44	18501140	3330205	21831345
5	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2011968	17-Nov-21	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5152510	1596247.6	China	76.65	22	9323553	1678239	11001792
6	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2012232	23-Nov-21	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	4820090	1443212.07	China	76.65	22	9323553	1678239	11001792
7	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2012680	03-Dec-21	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	4871130	1458494.26	China	76.65	22	9323553	1678239	11001792
8	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2012715	03-Dec-21	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	4842420	1449898.03	China	76.65	22	9323553	1678239	11001792
9	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2013140	15-Dec-21	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5176380	1603642.52	China	76.65	22	9323553	1678239	11001792
10	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2001518	02-Feb-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5135460	1590965.51	China	76.65	22	9323553	1678239	11001792
11	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2001761	08-Feb-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	2348250	727487.85	China	76.65	10	4237979	762836	5000815
12	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2001925	10-Feb-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	3287550	1018482.99	China	76.65	14	5933170	1067971	7001140
13	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2002052	14-Feb-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	4696500	1454975.7	China	76.65	20	8475957	1525672	10001629
14	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2002298	17-Feb-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5166150	1600473.27	China	76.9	22	9353962	1683713	11037675
15	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2002417	21-Feb-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5186610	1552954.02	China	76.9	22	9353962	1683713	11037675
16	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2002512	22-Feb-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5186610	1552954.02	China	76.9	22	9353962	1683713	11037675
17	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2002710	02-Mar-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5186610	1552954.02	China	76.9	22	9353962	1683713	11037675
18	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2003606	21-Mar-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5227530	1565206.12	China	76.9	22	9353962	1683713	11037675
19	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2003983	21-Mar-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5244580	1570311.17	China	76.9	22	9353962	1683713	11037675
20	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2004292	25-Mar-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5269957	1577909.45	China	76.9	22	9353962	1683713	11037675
29	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2004692	05-Apr-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5269957	1632633	CHINA	76.9	22	9353962	1683713	11037675
30	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2004831	06-Apr-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5269957	1632633	CHINA	76.9	22	9353962	1683713	11037675
31	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2004887	08-Apr-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5269957	1632633	CHINA	76.9	22	9353962	1683713	11037675
32	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2005014	12-Apr-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5263104	1630510	CHINA	76.8	22	9341798	1681524	11023322
33	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2005075	12-Apr-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5347584	1656682	CHINA	76.8	22	9341798	1681524	11023322

34	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2005107	13-Apr-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5347584	1656682	CHINA	76.8	22	9341798	1681524	11023322
35	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2005188	18-Apr-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5347584	1656682	CHINA	76.8	22	9341798	1681524	11023322
36	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2005232	18-Apr-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5347584	1656682	CHINA	76.8	22	9341798	1681524	11023322
37	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2005319	19-Apr-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5347584	1656682	CHINA	76.8	22	9341798	1681524	11023322
38	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2005471	25-Apr-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5347584	1656682	CHINA	76.8	22	9341798	1681524	11023322
39	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2005419	25-Apr-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5347584	1656682	CHINA	76.8	22	9341798	1681524	11023322
40	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2005459	25-Apr-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5347584	1656682	CHINA	76.8	22	9341798	1681524	11023322
41	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2006101	04-May-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	10743909	3328463	CHINA	77.15	44	18768743	3378374	22147117
42	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2006292	09-May-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	10102796	3129846	CHINA	77.05	44	18744416	3373995	22118411
43	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2006291	09-May-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	10102796	3129846	CHINA	77.05	44	18744416	3373995	22118411
44	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2006815	23-May-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5051398	1564923	CHINA	77.05	22	9372208	1686997	11059205
45	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2007001	23-May-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5153016	1596404	CHINA	78.6	22	9560747	1720934	11281681
25	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2007219	26-May-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5153016	1596404	CHINA	78.6	22	9560747	1720934	11281681
106	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2007216	26-May-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5153016	1596404	CHINA	78.6	22	9560747	1720934	11281681
46	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2008216	16-Jun-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	10189300	3156645	CHINA	78.5	44	19097166	3437490	22534656
47	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2008540	20-Jun-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	10317186	3196264	CHINA	78.95	44	19206640	3457195	22663835
22	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2008626	21-Jun-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	10317186	3196264	CHINA	78.95	44	19206640	3457195	22663835
48	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2008822	24-Jun-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5158593	1598132	CHINA	78.95	22	9603320	1728598	11331918
49	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2009008	28-Jun-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5158593	1598132	CHINA	78.95	22	9603320	1728598	11331918
50	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2009415	04-Jul-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5123855	1587370	CHINA	78.95	22	9603320	1728598	11331918
51	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2009845	11-Jul-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5185510	1606471	CHINA	79.9	22	9718876	1749398	11468274
52	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2009907	11-Jul-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5185510	1606471	CHINA	79.9	22	9718876	1749398	11468274
53	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2010084	14-Jul-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5185510	1606471	CHINA	79.9	22	9718876	1749398	11468274
54	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2010363	19-Jul-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5185510	1606471	CHINA	79.9	22	9718876	1749398	11468274
55	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2010499	21-Jul-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5185510	1606471	CHINA	79.9	22	9718876	1749398	11468274
23	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2010720	26-Jul-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5253655	1627582	CHINA	80.95	22	9846596	1772387	11618983

56	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2010866	28-Jul-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5253655	1627582	CHINA	80.95	22	9846596	1772387	11618983
57	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2011092	01-Aug-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	10507310	3255165	CHINA	80.95	44	19693192	3544775	23237967
58	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2011221	02-Aug-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	4844048	1500686	CHINA	80.95	22	9846596	1772387	11618983
59	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2014452	26-Sep-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	4844136	1500713	CHINA	80.4	22	9779695	1760345	11540040
60	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2014553	26-Sep-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	4844136	1500713	CHINA	80.4	22	9779695	1760345	11540040
61	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2015010	03-Oct-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	4844048	1500686	CHINA	80.4	22	9779695	1760345	11540040
62	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2015024	03-Oct-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE RUTILE	4844048	1500686	CHINA	80.4	22	9779695	1760345	11540040
63	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2015215	06-Oct-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	4844048	1500686	CHINA	80.4	22	9779695	1760345	11540040
64	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2015310	07-Oct-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	4921631	1524721	CHINA	82.45	22	10029053	1805230	11834283
65	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2015548	13-Oct-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	4915669	1522874	CHINA	82.45	22	10029053	1805230	11834283
66	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2015679	13-Oct-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	4915669	1522874	CHINA	82.45	22	10029053	1805230	11834283
68	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2016002	17-Oct-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	4915669	1522874	CHINA	82.45	22	10029053	1805230	11834283
69	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2016074	18-Oct-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5387283	1668980	CHINA	82.45	22	10029053	1805230	11834283
67	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2016073	27-Oct-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5387283	1668980	CHINA	82.45	22	10029053	1805230	11834283
70	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2016469	27-Oct-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	3710058	1149376	CHINA	83.9	22	10205428	1836977	12042405
71	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2016904	01-Nov-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	3710058	1149376	CHINA	83.9	22	10205428	1836977	12042405
72	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2017045	03-Nov-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5020576	1555374	CHINA	83.9	22	10205428	1836977	12042405
73	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2017309	07-Nov-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5014592	1553521	CHINA	83.8	22	10193264	1834788	12028052
74	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2017502	09-Nov-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5438620	1684884	CHINA	83.8	22	10193264	1834788	12028052
75	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2017676	14-Nov-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5438620	1684884	CHINA	83.8	22	10193264	1834788	12028052
76	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2017885	16-Nov-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5438620	1684884	CHINA	83.8	22	10193264	1834788	12028052
77	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2018209	22-Nov-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	3652572	1131567	CHINA	82.6	22	10047299	1808514	11855813
78	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2018748	30-Nov-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	5360740	1660757	CHINA	82.6	22	10047299	1808514	11855813
79	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2019088	05-Dec-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	6778156	2099873	CHINA	82	44	19948632	3590754	23539386
80	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2019089	06-Dec-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	6778156	2099873	CHINA	82	44	19948632	3590754	23539386
81	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2019222	07-Dec-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	6765000	2095797	CHINA	82	44	19948632	3590754	23539386

83	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2019293	07-Dec-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	6710880	2079031	CHINA	82	44	19948632	3590754	23539386
26	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2019436	09-Dec-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	6710880	2079031	CHINA	82	44	19948632	3590754	23539386
82	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2019255	12-Dec-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	6765000	2095797	CHINA	82	44	19948632	3590754	23539386
84	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2019380	12-Dec-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	6778156	2099873	CHINA	82	44	19948632	3590754	23539386
85	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2019795	14-Dec-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	3292300	1019955	CHINA	82	22	9974316	1795377	11769693
86	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2020671	29-Dec-22	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	6856113	2124024	CHINA	83.55	44	20325710	3658628	23984338
88	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2000143	04-Jan-23	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	6837732	2118329	CHINA	83.55	44	20325710	3658628	23984338
27	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2000206	05-Jan-23	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	10256598	3177494	CHINA	83.55	66	30488565	5487942	35976506
24	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2000463	13-Jan-23	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	3452625	1069623	CHINA	83.7	22	10181101	1832598	12013699
87	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2020673	13-Jan-23	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	6856113	2124024	CHINA	83.55	44	20325710	3658628	23984338
89	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2000464	13-Jan-23	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	6905250	2139246	CHINA	83.7	44	20362201	3665196	24027397
90	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2000465	13-Jan-23	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	6905250	2139246	CHINA	83.7	44	20362201	3665196	24027397
91	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2001283	27-Jan-23	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	3425004	1061066	CHINA	1	22	121638	21895	143533
21	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2002275	07-Feb-23	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	6990720	2165725	CHINA	82.75	44	20131089	3623596	23754685
92	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2002276	07-Feb-23	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	6990720	2165725	CHINA	82.75	44	20131089	3623596	23754685
93	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2002595	08-Feb-23	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	6990720	2165725	CHINA	82.75	44	20131089	3623596	23754685
94	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2002720	09-Feb-23	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	6990720	2165725	CHINA	82.75	44	20131089	3623596	23754685
95	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2002756	10-Feb-23	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE ANATASE	6990720	2165725	CHINA	82.75	44	20131089	3623596	23754685
96	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2003363	20-Feb-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	7066752	2189280	CHINA	83.65	44	20350037	3663007	24013044
97	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2003364	22-Feb-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	7066752	2189280	CHINA	83.65	44	20350037	3663007	24013044
98	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2003849	24-Feb-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	3533376	1094640	CHINA	83.65	22	10175019	1831503	12006522
99	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2003850	24-Feb-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	6919528	2143670	CHINA	83.65	44	20350037	3663007	24013044
100	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2003962	28-Feb-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	3533376	1094640	CHINA	83.65	22	10175019	1831503	12006522
101	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2004205	03-Mar-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	3527040	1092677	CHINA	83.5	22	10156773	1828219	11984992
102	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2004283	07-Mar-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	3527040	1092677	CHINA	83.5	22	10156773	1828219	11984992
103	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2004399	09-Mar-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	7054080	2185354	CHINA	83.5	44	20313546	3656438	23969984

28	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2004483	13-Mar-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	7077794	2192701	CHINA	83.5	44	20313546	3656438	23969984
104	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2004477	13-Mar-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	3538897	1096350	CHINA	83.5	22	10156773	1828219	11984992
105	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2004482	13-Mar-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	7077794	2192701	CHINA	83.5	44	20313546	3656438	23969984
112	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2005560	03-Apr-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	7082024	2194011	China	83.7	24	11106655	1999198	13105853
113	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2005559	03-Apr-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	7082024	2194011	China	83.7	24	11106655	1999198	13105853
114	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2005635	03-Apr-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	3559343	1102684	China	83.7	24	11106655	1999198	13105853
115	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2005636	03-Apr-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	7082024	2194011	China	83.7	24	11106655	1999198	13105853
116	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2005923	11-Apr-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	7082024	2194011	China	82.85	24	10993864	1978895	12972759
117	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2005934	11-Apr-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	7082024	2194011	China	82.85	24	10993864	1978895	12972759
118	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2005930	11-Apr-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	7082025	2194011	China	82.85	24	10993864	1978895	12972759
122	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2006143	12-Apr-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	7082024	2194011	China	82.85	24	10993864	1978895	12972759
119	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2005932	17-Apr-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	7082024	2194011	China	82.85	24	10993864	1978895	12972759
120	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2005931	27-Apr-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	7623396	2361728	China	82.85	24	10993864	1978895	12972759
123	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2007581	03-May-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	3823237	1184439	China	83.15	24	11033672	1986061	13019733
124	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2009700	02-Jun-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	7513660	2327732	China	83.3	24	11053577	1989644	13043221
121	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2005933	06-Jun-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	7623396	2361728	China	82.85	24	10993864	1978895	12972759
125	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2010232	12-Jun-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	3834732	1188000	China	83.4	24	11066846	1992032	13058879
107	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2010552	19-Jun-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	7531020	2333110	China	83.4	24	11066846	1992032	13058879
126	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2011416	03-Jul-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	7499415	2323319	China	83.05	24	11020403	1983673	13004075
127	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2011930	06-Jul-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	3753860	1162946	China	83.05	24	11020403	1983673	13004075
128	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2012315	10-Jul-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	3762900	1165746	China	83.25	24	11046942	1988450	13035392
109	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2012644	14-Jul-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	3754575	1163167	China	83.25	24	11046942	1988450	13035392
129	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2013346	20-Jul-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	3434063	1063873	China	83.25	24	11046942	1988450	13035392
130	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2013440	20-Jul-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	3434063	1063873	China	83.25	24	11046942	1988450	13035392
131	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2013716	27-Jul-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	6868125	2127745	China	82.95	24	11007133	1981284	12988417
132	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2014257	31-Jul-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	3745555	1160373	China	82.95	24	11007133	1981284	12988417

133	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2014627	03-Aug-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	3077445	953392	China	82.95	24	11007133	1981284	12988417
134	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2014628	03-Aug-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	3403439	1054385	China	82.95	24	11007133	1981284	12988417
135	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2014629	03-Aug-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	3745555	1160373	China	82.95	24	11007133	1981284	12988417
136	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2014736	03-Aug-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	3745555	1160373	China	82.95	24	11007133	1981284	12988417
137	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2014991	09-Aug-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	3770360	1168058	China	83.6	24	11093386	1996809	13090195
138	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2015102	09-Aug-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	3770360	1168058	China	83.6	24	11093386	1996809	13090195
110	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2015483	16-Aug-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	7623396	2361728	China	83.6	24	11093386	1996809	13090195
111	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2015593	17-Aug-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	3811698	1180864	China	83.6	24	11093386	1996809	13090195
139	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2015594	22-Aug-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	7623396	2361728	China	83.6	24	11093386	1996809	13090195
140	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2016038	22-Aug-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	3820806	1183686	China	83.9	24	11133194	2003975	13137169
108	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2018966	29-Sep-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	7026580	2176834	China	84.05	24	11153099	2007558	13160657
141	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2018967	29-Sep-23	STEINWEG SHARAF INDIA PVT LIMITED	32061110	TITANIUM DIOXIDE ANATASE	3118255	966035	China	84.05	24	11153099	2007558	13160657
142	SARAL MINERALS AND CHEMICALS INDIA LLP	ADIFS6332G	2022346	06-Nov-23	Kerry Indev Logistics Private Limited	32061110	TITANIUM DIOXIDE	1387616	429883	China	84.2	6.4	2979468	536304	3515772
								797692370							**2044715210**

GOVERNMENT OF INDIA
MINISTRY OF COMMERCE & INDUSTRY
OFFICE OF THE DEVELOPMENT COMMISSIONER
4TH FLOOR, "C" WING, PORT USER'S BUILDING
ADANI PORT & SPECIAL ECONOMIC ZONE
MUNDRA, (KUTCH)- 370 421
PH NO.02838-271018, FAX NO.02838-271023

सत्यमेव जयते

Azadi Ka Amrit Mahotsav

F.No. APSEZ/77/CERA Audit-SO Office/2022-23 /01-02.   Dated: 03.04.2023

To.
(i) M/s OWS Warehouse Services LLP,
APSEZ, Mundra.

(ii) M/s Kerry Indev Logistics Ltd.,
APSEZ, Mundra.

Gentlemen,

Sub: Non levy of Anti-dumping duty - reg.

Please find enclosed herewith an Audit enquiry reference: #6(AENQ-254245) dated 29.03.2023 issued by Assistant Audit Officer, CRA, Party- II, O/o the Director General of Audit (Central), Ahmedabad.

2. In this regard, it is requested to furnish your comments in the matter within seven days of receipt of this letter. Further, if you agree with the objection raised by the CRA audit team, kindly submit the duty paid challan/s of duty deposit along with applicable interest.

Encls.: As above

Yours faithfully,

2/4.

Specified Officer
APSEZ, Mundra

Suresh Kumar
I/c - Specified Officer
APSEZ, Mundra

Dilpendra Singh
9638677787

Piyush
Received
Piyush Goswami
02/04/2023
9925690111

Scanned with CamScanner

KERRYINDEV
LOGISTICS

INDEV
Since 1984

KERRY INDEV FTWZ/MUN-DC/002/23-24

Dated: 14.04.2023

17- -2023

INWARD No. 73

To,
The Specified Officer
Office of the Development commissioner,
Government of India
Ministry of Commerce & Industry
4th Floor, 'C' Wing, Port User's Building
Adani Ports And Special Economic Zone
Mundra, (Kutch) -370 421.
Gujarat, India.

Dear Sir,

Sub – Re: Non-Levy of Anti-Dumping Duty reg. F No:- APSEZ/77CERA Audit SO Office/2022-23/02

With reference to the above-mentioned file number and letter dated 03.04.2023 copy of which we have received from your good office.

We would like to submit importer clarification letter (Attached) received form Importer Saral Minerals & Chemicals India LLP, dated 05.04.2023

Hence we hereby request your goods office that to issue a letter for closure of Non-Levy of Anti-Dumping Duty.

Thanking You,

Yours faithfully,

For:- **Kerry Indev Logistics Pvt ltd.,**

KERRY INDEV LOGISTICS PRIVATE LIMITED FTWZ

Authorised Signatory.

Ram Kumawat
Assistant Manager
7574858814

Encl: Importer clarification letter

Saral Minerals & Chemicals India LLP

Hubtown Solaris, Unit No. 1063, N.S. Phadke Road, Andheri (East), Mumbai - 400 069.
Tel(O) : +91-022-35112402 / 35112397 • E-mail : saralchem1904@yahoo.com • Website : www.saralchem.com

Dated: 5th April, 2023

To
The Specified Officer,
Office of the Development Commissioner
4th Floor, C Wing, Port User's Building,
Adani Port & Special Economic Zone
Mundra – Kutch 370 421

Subject: Re: Non-Levy of Anti-Dumping duty reg.
F No: APSEZ/77/CERA Audit SO Office/2022-23/02

Dear Sir,

With reference to the above-mentioned file number and letter dated 03.04.2023 copy of which we have received through M/S Kerry Indev Logistics Ltd, APSEZ Mundra, we would like to explain the basic and the technical difference between Titanium Dioxide and Natural Mica based Pearl Industrial Pigments.

As per Notification No. 47/2021 -Customs (ADD) dated: 26th August, 2021, Anti-dumping duty is imposed on Natural Mica based Pearl Industrial Pigments excluding cosmetic grade". Titanium Dioxide is a different and separate product whereby the properties and product characteristics are all together different. Hence, we refute your claim of addition of Anti-dumping duty on Titanium Dioxide. Below are the differences between both Titanium Dioxide and Natural Mica based Pearl Industrial pigments.

Natural mica-based Pearl industrial pigment and titanium dioxide (TiO2) are two different types of pigments used in industrial applications, and they have different properties and characteristics.

Mica-based Pearl industrial pigment is a natural mineral pigment that is derived from mica, a type of silicate mineral. It is often used as a colorant in cosmetics, coatings, and plastics due to its ability to provide a pearlescent effect. The pearlescent effect is created by the way light reflects off the surface of the pigment, which gives the appearance of a metallic or iridescent shine.

Titanium dioxide, on the other hand, is a synthetic white pigment that is used for its opacity and brightness. It is commonly used in paints, coatings, plastics, and other industrial applications due to its high refractive index, which

Saral Minerals & Chemicals India LLP

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means it can reflect and scatter light effectively. This makes it an excellent pigment for achieving a bright, white color in products.

In terms of their properties, mica-based Pearl industrial pigment is typically more translucent and provides a softer, more subtle color effect, while titanium dioxide is opaque and provides a bright, solid color. Additionally, mica-based Pearl industrial pigment is more resistant to heat and chemical reactions than titanium dioxide, making it suitable for use in high-temperature applications.

Overall, the choice between these two pigments depends on the desired effect and application. Mica-based Pearl industrial pigment is ideal for creating a pearlescent or metallic effect, while titanium dioxide is better for achieving a bright, solid color.

The chemical differences between natural mica-based pearl industrial pigment and titanium dioxide are significant, as they are composed of different materials.

Titanium dioxide is a naturally occurring mineral composed of titanium and oxygen. It is a white pigment that is commonly used in industrial applications, such as paint, coatings, plastics, and paper.

Mica is a naturally occurring mineral that is composed of a combination of aluminum, silicon, oxygen, and other elements. Mica is often used as a substrate for pigments, including natural mica-based pearl industrial pigment.

The chemical properties of these materials also differ. For example, mica is a layered mineral that has good thermal stability and electrical insulation properties, while titanium dioxide has a high refractive index and is very chemically stable.

Another important difference between these materials is their reactivity. Mica-based pearl pigments are relatively inert and do not react with other chemicals, while titanium dioxide can react with acids, alkalis, and other chemicals.

In summary, natural mica-based pearl industrial pigment and titanium dioxide are composed of different materials with distinct chemical properties and reactivity. The metal oxides in the mica-based pigments provide colour and pearlescent effects, while titanium dioxide is a white pigment that is commonly used in industrial applications.

Saral Minerals & Chemicals India LLP

Hubtown Solaris, Unit No. 1063, N.S. Phadke Road, Andheri (East), Mumbai - 400 069.
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The CTH 3206 1110 includes not only pearlescent pigments based on titanium dioxide but also titanium dioxide itself. The two products are separate and are used for different purposes. Pearlescent pigments impart metallic red, blue or golden colour whereas titanium dioxide imparts white colour. Titanium dioxide has no mica content whereas pearl pigment has high mica content.

Most importantly, all our imports are Anatase Grade where there is no coating on the product at all.

We hope that the above cited facts are self-explanatory and are enough differentiate between Titanium Dioxide and Natural mica-based pearl industrial pigments.

Thanking you in anticipation of acceptance of the facts.

For Saral Minerals & Chemicals India LLP
For SARAL MINERALS AND CHEMICALS INDIA LLP

Chintan Doshi PARTNER / AUTHORISED SIGNATORY
Partner

Copy: M/S Kerry Indev Logistics Ltd
APSEZ Mundra