

THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

AIPMA House, A-52, Road No. 1, M.I.D.C., Marol, Andheri (East), Mumbai - 400 093, India.

Phone : +91 22 6777 8899 (30 Lines)

E-mail : office@aipma.net • Website : www.aipma.net • CIN No.: U74999MH1947NPL005734

OFFICE BEARERS :

SUNIL SHAH
President

ANIL REDDY VENNAM
Senior Vice President

BIPIN DESAI
Vice President - Finance

MAYUR K. SHAH
Vice President (West Zone)

SUNIL MONGA
Vice President (North Zone)

Y. V. RAMAN
Vice President (South Zone)

ASHOK AGARWAL
Vice President (East Zone)

North Zone :
Plot No. 232, Sector - 18,
Phase - IV, Udyog Vihar,
Gurugram, Haryana - 122 016.
Tel. No.: 0124 4050 005 / 6
aipma.north@aipma.net

South Zone :
4C-Gaiety Palace,
1, Blackers Road, Chindadripet,
Chennai - 600 002.
Tel No.: 044 4203 0236
aipma.south@aipma.net

East Zone :
Gajraj Signature,
Suite # 5E, 5th Floor,
5A, Sadananda Road,
Kolkata - 700 026.
Tel No.: 033 4005 0367
aipma.east@aipma.net

West Zone :
Block - A, 13th Floor,
Office No.1306/1307,
Mondeal Heights,
Near Wide Angle Cinema,
S.G. Highway,
Ahmedabad - 380 015.
Tel No.: 079 2970 5124
aipma.west@aipma.net

Letter No: 42/AIPMA/09/26-27
23rd Sep 2026

To,
Sh G Venkatesh, ICoAS
Joint Secretary (Petro Chemicals)
Department of Chemicals and Petro-Chemicals,
Ministry of Chemicals and Fertilizers
Kartavya Bhawan-2
New Delhi-110001

Subject: Review of concessions to ASEAN for Articles of Plastics.

Dear Sir,

With reference to the video meet held on 22nd Sept at 10.30 am for review of tariff lines for withdrawal of Duty Concession Cases as well as for **giving more concessions** under ASEAN and Korea FTAs.

126 Tariff lines were discussed for further concession include products at serial number 8 and 9 of the table shared on screen. It contained total of 65 tariff lines for plastics waste and articles of plastics, which are products of concern for AIPMA

The details of 65 tariff lines which concern for AIPMA are as below.

Chapter 39 Products				
Tariff Headings	Description	No of Tariff lines	Category	Duty Rate
3915	Waste Material	13	EL- Exclusion	MFN
3916-3926	Articles of Plastics	13	EL- Exclusion	MFN
		40	ST- Sensitive Track	5%

AIPMA submissions for these are given below

A. Tariff heading 3915 for plastics waste:

Plastics waste as such are not allowed to be imported in the country and is already in Exclusion list. We need not consider any concession on imports of plastics waste and retail them in the Exclusion list.

We need not consider any further concession and maintain Status Quo.

B. 13 Tariff lines under heading 3920 and 3921:

The 13-line items in Exclusion list are as below

THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

AIPMA House, A-52, Road No. 1, M.I.D.C., Marol, Andheri (East), Mumbai - 400 093, India.

Phone : +91 22 6777 8899 (30 Lines)

E-mail : office@aipma.net • Website : www.aipma.net • CIN No.: U74999MH1947NPL005734

OFFICE BEARERS :

SUNIL SHAH
President

ANIL REDDY VENNAM
Senior Vice President

BIPIN DESAI
Vice President - Finance

MAYUR K. SHAH
Vice President (West Zone)

SUNIL MONGA
Vice President (North Zone)

Y. V. RAMAN
Vice President (South Zone)

ASHOK AGARWAL
Vice President (East Zone)

North Zone :
Plot No. 232, Sector - 18,
Phase - IV, Udyog Vihar,
Gurugram, Haryana - 122 016.
Tel. No.: 0124 4050 005 / 6
aipma.north@aipma.net

South Zone :
4C-Gaiety Palace,
1, Blackers Road, Chindadripet,
Chennai - 600 002.
Tel No.: 044 4203 0236
aipma.south@aipma.net

East Zone :
Gajraj Signature,
Suite # 5E, 5th Floor,
5A, Sadananda Road,
Kolkata - 700 026.
Tel No.: 033 4005 0367
aipma.east@aipma.net

West Zone :
Block - A, 13th Floor,
Office No.1306/1307,
Mondeal Heights,
Near Wide Angle Cinema,
S.G. Highway,
Ahmedabad - 380 015.
Tel No.: 079 2970 5124
aipma.west@aipma.net

Tariff 01.01.2024 (Source: CBIC)	Tariff Description (Source: CBIC)
39207321	Rigid, Plain
39209931	Rigid, Plain
39209941	Rigid, Plain
39209942	Flexible, Plain
39219021	Rigid, Lacquered
39219025	Rigid, Laminated
39219026	Flexible, Laminated
39219034	Flexible, Metallised
39219035	Rigid, Laminated
39219092	Flexible, Lacquered
39219093	Rigid, Metallised
39219094	Flexible, Metallised
39219096	Flexible, Laminated

Tariff heading 3920 and 3921 have the following description:

3920: Finished/non-cellular plastic film, sheet, foil and strip which is NOT reinforced/laminated/combined

3921: Other plastic film, sheet, foil and strip, including cellular, reinforced, laminated or otherwise combined products

Indian processing industry is fully capable of making products under above two tariff headings, we need not consider any further concession and maintain Status Quo.

C. 40 tariff lines under sensitive track and duty rate of 5%

The balance 40 tariff lines out of list of 65 are for articles of plastics under various heading including 3920. There is huge import of articles of plastics from ASEAN. The table below gives trend in last three years.

Value in US\$ Millions							
Chapter 39 Imports	India's export to ASEAN			India's import from ASEAN			Difference between export & import
Products	2023	2024	2025	2023	2024	2025	
RAW MATERIAL	327	441	373	3015	2892	2979	-2607
FINISHED PRODS	223	226	214	421	563	817	-603
TOTAL CH 39	550	667	587	3436	3456	3796	-3209

Currently India is importing more and exporting less to ASEAN countries. There is trade deficit of US \$ 603 Mn for Plastics finished products. Therefore, any further duty concession is not in favour of MSME sector. On the contrary we must review the 5% duty and withdraw this concession.

MFN rates of duty on articles of Plastics is 11% and 16.5 %.

We request you to renegotiate the import duty on articles of plastics and raise it to 10%.

In addition, **Rules of Origin (RoO) Verification** needs to be strictly followed. India has flagged that current Rules of Origin under the older AITIGA framework

THE ALL INDIA PLASTICS MANUFACTURERS' ASSOCIATION

AIPMA House, A-52, Road No. 1, M.I.D.C., Marol, Andheri (East), Mumbai - 400 093, India.

Phone : +91 22 6777 8899 (30 Lines)

E-mail : office@aipma.net • Website : www.aipma.net • CIN No.: U74999MH1947NPL005734

OFFICE BEARERS :

SUNIL SHAH

President

ANIL REDDY VENNAM

Senior Vice President

BIPIN DESAI

Vice President - Finance

MAYUR K. SHAH

Vice President (West Zone)

SUNIL MONGA

Vice President (North Zone)

Y. V. RAMAN

Vice President (South Zone)

ASHOK AGARWAL

Vice President (East Zone)

North Zone :

Plot No. 232, Sector - 18,

Phase - IV, Udyog Vihar,

Gurugram, Haryana - 122 016.

Tel. No.: 0124 4050 005 / 6

aipma.north@aipma.net

South Zone :

4C-Gaiety Palace,

1, Blackers Road, Chindadripet,

Chennai - 600 002.

Tel No.: 044 4203 0236

aipma.south@aipma.net

East Zone :

Gajraj Signature,

Suite # 5E, 5th Floor,

5A, Sadananda Road,

Kolkata - 700 026.

Tel No.: 033 4005 0367

aipma.east@aipma.net

West Zone :

Block - A, 13th Floor,

Office No.1306/1307,

Mondeal Heights,

Near Wide Angle Cinema,

S.G. Highway,

Ahmedabad - 380 015.

Tel No.: 079 2970 5124

aipma.west@aipma.net

lack stringent product-specific value-addition criteria. Minimal transformation in intermediary ports frequently qualifies goods for preferential entry into India.

Submitted for your consideration.

Yours sincerely,

For The All India Plastics Manufacturers' Association



Sunil Shah
President - AIPMA



Arvind Mehta
Chairman, AIPMA Governing Council

CC: **Ms Vandana**

Director (Petro Chemicals)

Department of Chemicals and Petrochemicals

Kartavya Bhawan-2, New Delhi-110001