

**FINAL REPORT ON THE RESULTS OF THE SECOND EXTENSION INVESTIGATION  
TRADE SAFEGUARD MEASURES  
ON IMPORTED GOODS**

**CURTAINS (INCLUDING CURTAINS), INSIDE BLINDS, SPOTTED VALUES  
BEDS, AND OTHER FURNISHINGS**

**8 (EIGHT) 8-DIGIT *HARMONIZED SYSTEM* NUMBERS (HS NO.)  
BASED ON THE 2022 INDONESIAN CUSTOMS TARIFF BOOK**

**INDONESIAN TRADE SECURITY COMMITTEE (KPPI)  
JAKARTA, 2026**

**UNSECRET VERSION**

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## A. INTRODUCTION

### A.1. Background

1. Based on the Regulation of the Minister of Finance (PMK) Number 163/PMK.010/2019 dated November 6, 2019, the Indonesian Government imposed Temporary Safeguard Import Duty (BMTPS)

imposed for 200 days on the import of goods "Curtains (Including Curtains), Inner Blinds, Bed Mosquito Nets, and Other Furniture Items" which are included in the 8-digit *Harmonized System* (HS) numbers, namely 6303.12.00, 6303.19.90, 6303.91.00, 6303.92.00, 6303.99.00, 6304.19.90, 6304.91.90, 6304.92.00 in accordance with the Indonesian Customs Tariff Book (BTKI) 2017, with the following amounts:

**Table 1. BMTPS Rates**

Period	BMTPS (Rp/Kg)
November 9, 2019 to May 26, 2020 (200 days)	41,083

Source: PMK 163/PMK.010/2019

2. Based on the Regulation of the Minister of Finance (PMK) Number 54/PMK.010/2020 dated May 27, 2020, the Indonesian Government imposes Safeguard Measures Import Duty (BMTP) on the import of goods "Curtains (Including Curtains), Inner Blinds, Bed Mosquito Nets, and Other Furniture Items" which are included in the 8-digit *Harmonized System* (HS) number.

namely 6303.12.00, 6303.19.90, 6303.91.00, 6303.92.00, 6303.99.00, 6304.19.90, 6304.91.90, 6304.92.00 according to the Indonesian Customs Tariff Book (BTKI) 2017, with the following amounts:

**Table 2. Initial Imposition of BMTP Rates**

Period	BMTP (Rp/Kg)
Year I, May 27, 2020 to November 8, 2020	41,083
Year II, November 9, 2020 to November 8, 2021	34,961
Year III, November 9, 2021 to November 8, 2022	28,839

Source: PMK 54/PMK.010/2020

3. Furthermore, based on PMK Number 45 of 2023 dated April 26, 2023, the Indonesian Government has imposed an extension of the BMTP regarding the imposition of Safeguard Measures Import Duty on the import of goods "Curtains (Including Curtains), Indoor Blinds, Bed Mosquito Nets, and Other Furniture Items" with the amounts as stated in the following table:

**Table 3. BMTP Tariffs for Initial Imposition of First Extension**

Period	BMTP (Rp/Kg)
Year I, May 22, 2023 to May 21, 2024	22,717
Year II, May 22, 2024 to May 21, 2025	16,595
Year III, May 22, 2025 to May 21, 2026	10,473

Source: PMK 45 of 2023

4. On November 17, 2025, the Indonesian Trade Safeguard Committee (KPPI) received a letter of application accompanied by initial evidence of application from the Indonesian Textile Association (API), hereinafter referred to as the Applicant, to conduct an investigation in the context of the second extension of the imposition of Trade Safeguard Measures (TPP) on the import of goods "Curtains (Including Curtains), Inner Blinds, Bed Nets, and Other Furniture Items" with No.

*Harmonized System (HS) 8 digits 6303.12.00, 6303.19.90, 6303.91.00, 6303.92.00, 6303.99.00, 6304.19.90, 6304.91.90, 6304.92.00, in accordance with the Indonesian Customs Tariff Book (BTKI) 2022.*

5. From the results of the initial evidence research of the application and based on letter No. 04/KPPI/PENG/11/2025 dated November 25, 2025, KPPI decided to accept the application and determine the start of the investigation into the imposition of the second extension of the TPP on the import of Curtains (Including Curtains), Indoor Blinds, Bed Mosquito Nets, and Other Furniture Items on the same date, which was immediately announced through the *Bisnis Indonesia* Newspaper and the Ministry of Trade *Website* on the same day.

## A.2. Applicant's Identity

6. Applicant's Identity:

Name : Indonesian Textile Association (API)  
Address : Graha Surveyor Indonesia, 16th floor, Jl. Gatot Subroto Kav. 56, South Jakarta  
Tel./Fax. : 021 – 5272171 / 021 – 5272166  
E-mail : [sekretariat@bpnapi.org](mailto:sekretariat@bpnapi.org)  
Contact Person : Jemmy Kartiwa Sastraatmadja  
Position : Chairman of API

7. The company represented by the Applicant in the investigation is:

- 1) Name: PT. Sinar Para Taruna Textile

Address: Jalan Raya Batujajar No. 36 Km. 4.5, Batujajar, Cimahi, Selacau, Bandung, West Bandung Regency, West Java

E-mail : [Felix@sinarparataruna.co.id](mailto:Felix@sinarparataruna.co.id)

Tel/Fax: (022) 6866156

2) Name: PT. Wiska

Address: Jl. Raya Bandung - Garut No.Km. 20.9, Cipacing, Kec. Jatinangor, Sumedang Regency, West Java.

Email: [marketing@wiska.co.id](mailto:marketing@wiska.co.id)

Tel/Fax: 022-7798155 / 022-7798855

### A.3. Major Proportion

**Table 4. Production Proportion in 2024**

Description	Proportion (%)
PT. Sinar Para Taruna Textile	43.58
PT. Wiska	26.00
<b>Applicant's Production</b>	<b>69.58</b>
<b>Non-Applicant Production</b>	<b>30.42</b>
<b>National Production</b>	<b>100</b>

Source: KPPI verification results

8. Based on Table 4 above, the Applicant's production proportion is 69.58% of the total national production, thus the Applicant is declared to have fulfilled the *major proportion* requirements according to *Article 4.1(c) Agreement on Safeguards (AoS)* and Article 1 number 18 of PP 34/2011 to represent IDN.

In the initial application for the imposition of Safeguard Measures on the investigated goods, there were 3 (three) domestic IDNs represented by the Applicant. However, due to serious losses suffered by the IDNs, one of these IDNs, PT. Sipatex Putri Lestari, went bankrupt and stopped producing Curtains (Including Curtains), Indoor Blinds, Bed Nets, and Other Furniture Items since 2022.

### A.4. Investigation Period

9. Extended Investigation Period of Trade Safeguard Measures (TPP) for the import of Curtain products (Including Curtains) Inner Blinds, Bed Mosquito Nets, and Other Furniture Items for 3 (three) years, namely 2022-2024.

### A.5. Procedures and Notifications

10. In accordance with Article 74 Paragraph (2) of PP 34/2011, on November 25, 2025, KPPI will provide written notification of the commencement of the second extension investigation to the Applicant, Importers Association, and other Interested Parties (PYB). This notification will be published in the Bisnis Indonesia newspaper and a press release on *the website*.

Ministry of Trade.

11. Based on *Article 12.1(a)* WTO AoS, dated 28 November 2025  
The Indonesian Government sent an *Article 12.1(a)* Notification to *the Committee on Safeguards* at the WTO regarding the commencement of an extension investigation and on December 4, 2025, the notification was circulated by the WTO with document number G/SG/N/6/IDN/33/Suppl.2.
12. In accordance with Article 78 Paragraph (1) of PP 34/2011, dated 28 November 2025  
KPPI has requested a written explanation in the form of a questionnaire.  
questionnaire to the applicant.
13. Referring to *Article 3* WTO AoS and Article 79 Paragraph (1) PP 34/2011, on December 18, 2025, KPPI held a Public Hearing *in* order to provide an opportunity for Interested Parties (PYB) to present evidence, views and responses regarding the commencement of the investigation into the extension of the TPP. The hearing was attended by:
  - Representative of the Government of the exporting country (Indian Embassy)
  - Importers Association (Indonesian Garment & Textile Association (AGTI))
  - Importer (PT. Feng Tay Indonesia Enterprise)
  - Relevant Ministries/Institutions (Deputy for Economic Affairs and Digital Transformation (Bappenas), Directorate General of Chemical, Pharmaceutical, and Textile Industries and Directorate General of Regional Resilience, and National Industrial Access (Ministry of Industry), and Trade Advocacy Bureau and Center for Export-Import Policy and Trade Security (Ministry of Trade), and related Ministries/Institutions present online, *namely* Deputy III for Commerce and Digital Economy of the Coordinating Ministry for Economic Affairs), as well as the Directorate General of Economic and Fiscal Strategy and the Directorate General of Customs and Excise (Ministry of Finance).
  - IDN Association and Applicant (Indonesian Textile Association (API), PT. Sinar Para Taruna Textile and PT. Wiska).
14. The Applicant's questionnaire responses were submitted to KPPI on December 18, 2025.
15. Referring to *Article 4.2(b)*. AoS, in order to check the accuracy of the data and information statements contained in the questionnaire answers submitted by the Applicant, on January 19, 2026  
KPPI verified the Applicant's performance and on January 29, 2026, KPPI conducted verification regarding structural adjustments.

## **B. STATEMENT OF THE INTERESTED PARTIES**

### **Hearing (*Public Hearing*)**

16. The public hearing was held on December 18, 2025  
in the Orchid Room, Building 1, 12th Floor, Ministry of Trade with the aim of obtaining evidence, views, and responses/statements submitted in writing. In accordance with the provisions of Article 79 Paragraph (2)  
PP 34/2011, PYB is given the opportunity to provide evidence, views, and responses/statements submitted in writing.  
within a period of no later than 5 (five) days after the hearing.

**B.1. Embassy of India in Jakarta, December 15, 2025****Statement**

17. *The Government of India* (GOI) requests the Indonesian government to stop imposing Safeguard Measures on Curtain imports and to compensate India for the loss of trade volume suffered as a result of this.

**Response to the statement from the Indian Embassy in Jakarta:**

Based on the investigation results, it was discovered that IDN **still** experienced losses during the investigation period, as detailed in *recitals* 32-35, and still needed time to implement structural adjustments. Therefore, the extension of the Safeguard Measures (TP) on the import of Curtain goods has fulfilled the requirements as stipulated in the provisions of *Art. 7.2 AoS* in conjunction with.

Article 88 paragraph (3) of PP No. 34 of 2011. Regarding requests for compensation, they can be submitted to the Indonesian government according to the specified schedule.

**B.2. Embassy of Mexico in Jakarta, December 22, 2025****Statement:**

18. As a developing country with an import market share of less than 3%, in accordance with the provisions of *Article 9.1 AoS*, Mexico is exempt from the imposition of Safeguard Measures.

**Response to the statement from the Mexican Embassy:**

Based on the results of the investigation, it was found that the cumulative total import share of developing countries with less than 3% was 13.29%. Referring to the provisions of *Article 9.1* of the *AoS* and *Article 90* of PP 34 of 2011, all developing countries with a share of less than 3% subject to Safety Measures because cumulatively it has exceeded 9%.

**B.3. Indonesian Garment and Textile Association (AGTI), December 22, 2025****Statement:**

19. Based on industry data, the number of industries for Curtains (including Curtains), Indoor Blinds, Bed Nets and Other Furniture Items in Indonesia is not very large. The re-implementation of BMTF for Curtain products has the potential to break the supply chain of downstream industries, especially in the garment, *home textile*, and SME sectors that are highly dependent on the availability of raw materials at competitive prices.

**Response to the statement from AGTI:**

Based on the verification results, the Applicant's installed capacity as explained in *recital* 38 is greater than national consumption, which means that the Applicant is able to meet national needs and will not disrupt the Downstream Industry supply chain.

**B.4. PT. Wiska, December 19, 2025****Statement:**

20. PT. Wiska requests the Government's support to provide adequate and measured policy space temporarily in the form of an extension of the imposition of Safeguard Measures on the import of Curtains (including Curtains), Indoor Blinds, Bed Nets and Other Furniture Items, so that the company has a realistic opportunity to gradually increase utilization, complete the remaining internal adjustments, and maintain business continuity and employment.

**B.5. Deputy for Economic Affairs and Digital Transformation, Bappenas, December 19, 2025**

If BMTP is re-enacted, it is necessary to:

1. Evaluation of the real achievements of the domestic industry during the six years of BMTP implementation, particularly regarding structural adjustments and increasing competitiveness as the initial objectives of the policy.
2. The evaluation must also ensure the industry's readiness to face the unprotected market, including the Applicant's strategic plan regarding the direction of industry development and concrete steps to be taken after the BMTP ends.
3. Furthermore, KPPI needs to confirm with the Applicant regarding the direction of industrial sustainability after the BMTP imposition period ends.

**C. INVESTIGATION****C.1. Proof of Similar Goods or Goods that are Directly Compete**

21. Based on Regulation Minister of Finance (PMK) number 54/PMK.010/2020, imported goods subject to BMTP are curtains (including curtains), inner blinds, bed nets and other furniture items with 8-digit HS numbers 6303.12.00, 6303.19.90, 6303.91.00, 6303.92.00, 6303.99.00, 6304.19.90, 6304.91.90, and 6304.92.00, in accordance with the Indonesian Customs Tariff Book (BTKI) 2017 and BTKI 2022.

**C.1.1. Goods Produced by the Applicant**

22. The characteristics, production process flow, raw materials, standardization and uses of the products produced by the Applicant are as follows:

**Physical Characteristics**

The characteristics of curtains (including curtains), inner blinds, bed nets, and other furniture items produced by the Applicant basically have the characteristics and characteristics of blocking light or reducing light, both sunlight and light from lamps. However, the difference between curtains and curtains is that curtains are lined with a woven fabric that is heavy enough to block out all outside light, making them perfect for bedroom use,

while the curtains are lined with light knitted/hooked fabric and reduce the intensity of incoming outside light.

**Figure 1. Curtains (Including Drapery), Blinds, Bed Nets, and Other Furnishings**

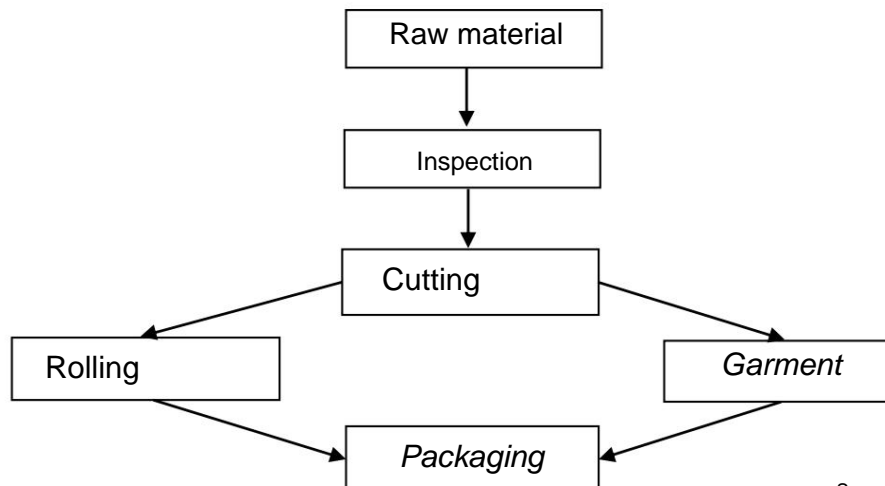


Source: Applicant

### Production Process Flow

The production process flow for curtains (including blinds), inner blinds, bed nets, and other furniture items is as follows:

**Figure 2. Flowchart of the production process of the goods under investigation**



Source: Applicant

Explanation of the production process for curtains (including blinds), blinds, bed nets, and other furniture items:

- a. The raw materials for curtains (including blinds), inner blinds, bed nets, and other furniture items are knitted or woven fabrics.
- b. After inspection is complete, it is sent to the cutting section to be measured and cut to the length requested by the customer.
- c. After the raw material is cut, it then goes into the rolling or *garment process*.
- d. Once cut, it is sent to the rolling section to be rolled using a board or using a cylindrical cloth *roll*.
- e. For curtains (including drapes), inner blinds, bed nets, and other furniture items that still require sewing and additional accessories, they are sent to the *garment* section for further processing according to request.
- f. From the rolling and *garment section*, the items are sent to the *packing section*, where they are labeled with a card or paper indicating the pattern and length. Each *piece* or *roll* is then wrapped in plastic, weighed, and the weight per *piece* or *roll* is listed on the plastic wrap. *Packaging* is the process of wrapping and packing the items ready for delivery to customers.

### **Raw material**

The raw materials used by the Applicant to produce curtains (including blinds), inner blinds, bed nets, and other furniture items are woven or knitted fabrics containing cotton, artificial (rayon), and synthetic fibers.

### **Standardization**

The standardization used by the Applicant to produce and technically test curtains (including blinds), inner blinds, bed nets, and other furniture items refers to the international standard *Lloyd's Register Quality Assurance* (LRQA) ISO 9001:2015 from England and the OEKO-TEX *certificate* from Japan.

### **Utility**

The use of curtains (including blinds), indoor blinds, bed nets, and other furniture items are generally used to block light (curtains and indoor blinds), reduce light (curtains), avoid mosquitoes (bed nets), and as interior decoration (other furniture items).

## **C.1.2. Imported Goods**

23. The Goods Under Investigation are imported goods that are the object of the investigation, in accordance with the description and specifications of the goods and the tariff heading number in the 2022 BTKI.
24. Based on the Preliminary Evidence submitted by the Applicant, imported curtains (including curtains), inner blinds, bed mosquito nets and other furniture items submitted for TPP investigation based on BTKI 2022 are:
  - a. Curtains (including drapes) and blinds, bed curtains or mosquito nets, knitted or crocheted, of synthetic fibres (HS No. 6303.12.00).
  - b. Curtains (including drapes) and blinds, bed curtains or valances, knitted or crocheted, of other textile materials, other than cotton (HS No. 6303.19.90).
  - c. Curtains (including drapes) and blinds, curtains or bed nets, other than knitted and crocheted, of cotton (HS No. 6303.91.00).
  - d. Curtains (including drapes) and blinds, curtains or bed nets, other than knitted and crocheted, of synthetic fibres (HS No. 6303.92.00).
  - e. Curtains (including drapes) and blinds, curtains or bed nets, other than knitted and crocheted, of other textile materials (HS No. 6303.99.00).
  - f. Other articles of furniture, excluding those of HS 94.04, bedspreads, other than knitted or crocheted, other than of cotton and non-wovens (HS No. 6304.19.90).
  - g. Other articles of furniture, excluding those referred to in HS 94.04, other than bedspreads and mosquito nets, knitted or crocheted, other than mosquito nets (HS No. 6304.91.90).

- h. Other articles of furniture, excluding those referred to in HS 94.04, other than bedspreads and mosquito nets, not knitted or crocheted, of cotton (HS No. 6304.92.00).

25. Characteristics, raw materials, standardization, and uses of imported goods are as follows:

**Physical Characteristics**

The characteristics of imported goods are the same as the characteristics of curtains (including blinds), inner blinds, bed nets and other furniture items produced by the Applicant as stated in *recital 22*.

**Raw material**

The raw materials for imported goods are generally the same as those produced by the Applicant, namely made from cotton thread and synthetic thread as stated in *recital 22*.

**Standardization**

Standardization of imported goods "curtains (including curtains), blinds, bed nets, and other furniture items" refers to the OEKO-TEX international standard as stated in *recital 22*.

**Utility**

The use of imported goods is the same as that produced by the Applicant, namely to prevent the entry of light as stated in *recital 22*.

**C.1.3. Conclusion of Evidence of the Investigated Goods**

26. Based on the explanation of *recital 22-25*, it can be concluded that the import of curtain goods (including curtains), inner blinds, bed nets, and other furniture items (HS No. 6303.12.00, 6303.19.90, 6303.91.00, 6303.92.00, 6303.99.00, 6304.19.90, 6304.91.90, and 6304.92.00 in accordance with BTKI 2022), are similar goods or goods that directly compete with the goods produced by the applicant because they have similar characteristics, production process flow, raw materials, standardization, and uses.

**C.2. Number of Imported Goods Investigated**

27. Analysis of the Surge in the Number of Imports of the Investigated Goods is one of the requirements needed in the imposition of TPP during the initial investigation (*original case*). However, in the case of imposing an extension of the TPP based on *Article 7.2 WTO AoS* and *Article 88 paragraph (3) PP 34/2011*, only two things are required, namely: (1) the existence of serious harm or threat of serious harm experienced by IDN, and (2) the need for additional time to complete structural adjustments. Therefore, the existence of an absolute surge in the number of imports or a surge in the number of imports relative to national production is not a requirement for extending the TPP.

**C.2.1. Absolute Import Amount****Table 5. Absolute Number of Imported Goods Investigated**

Description	Year			Change (%)			Trend (%)
	2022	2023	2024	2022 - 2023	2023 - 2024	2022 - 2024	
Import Amount (tons)	681	629	446	(7.64)	(29.09)	(19.07)	(19.07)

Source: Central Statistics Agency (BPS), processed

28. Based on Table 5 above, the absolute import volume experienced a downward trend of 19.07% from 2022 to 2024. In 2022, imports were 681 tons, dropping to 629 tons. In 2023, imports increased by 7.64%, and then continued to decline in 2024. decreased to 446 tons or 29.09%.

**C.2.2. Imports Relative to National Production****Table 6. Relative Imports of All Goods Investigated Compared to National Production**

Description	Year			Change (%)			Trend (%)
	2022	2023	2024	2022 - 2023	2023 - 2024	2022 - 2024	
Import Amount (tons)	681	629	446	(7.64)	(29.09)	(19.07)	
National Production (Index)	100	93.12	79.79	(6.88)	(14.31)	(10.68)	
Relative Imports (Index)	100	99.33	82.22	(0.67)	(17.23)	(9.33)	(9.33)

Source: BPS, API, processed

29. As can be seen in Table 6 above, in 2022-2024 the number of imports relative to national production experienced a decline with a trend of 9.33%.

Relative imports decreased from 100 index points in 2022 to 99.33 index points in 2023. Then in 2024, relative imports decreased significantly to 82.22 index points.

### C.2.3. Market Share of Importing Countries of Origin

**Table 7. Market Share of Import Origin Countries in Indonesia**

No	Country of origin Import	2022		2023		2024	
		Volume (Ton)	Share (%)	Volume (Ton)	Share (%)	Volume (Ton)	Share (%)
1	People's Republic of China	540.15	79.37	537.63	85.41	318.00	71.23
2	India	63.42	9.32	52.35	8.32	31.78	7.12
3	Brazil	0.01	0.00	0.00	0.00	27.92	6.26
4	Developing Countries < 3%	54.50	8.01	30.37	4.82	59.34	13.29
5	Other Countries	22.46	3.30	9,10	1.45	9.39	2.10
	<b>World</b>	<b>681</b>	<b>100</b>	<b>629</b>	<b>100</b>	<b>446</b>	<b>100</b>

Source: BPS, processed

30. As can be seen in Table 7 above, in 2024 the largest country of origin of imports was the People's Republic of China, controlling an import market share of 71.23%, followed by other countries, namely India with an import market share of 7.12%, and Brazil with an import market share of 6.26%.

Meanwhile, developing countries with a market share of less than 3% control the import market share, namely Taiwan, Singapore, Saudi Arabia, Hong Kong, cumulatively amounting to 13.29%, and other countries consisting of developed countries control the import market share, including Poland, the Netherlands, the United States, Japan, etc., namely 2.10%.

## C.3. Serious Loss / Threat of Serious Loss

### C.3.1. Applicant Performance

31. The Applicant's performance data in *recitals* 32-34 was further obtained from the analysis of questionnaire responses and verification. There are 6 (six) performance indicators analyzed, namely production volume, domestic sales volume, productivity, utilized capacity, profit/loss, and workforce, as follows:

**Production Volume and Domestic Sales Volume****Table 8. Production Volume and Domestic Sales Volume**

Description	Unit	Period			Change (%)		Trend (%)
		2022	2023	2024	2022 – 2023	2023 - 2024	2022 – 2024
Volume Production	Index 100	86.84	75.97	(13.16)		(12.52)	(12.84)
Volume Sale Domestic	Index 100	83.33	82.39	(16.67)		(1.13)	(9.23)

Source: KPPI Verification Results

32. As can be seen in Table 8 above, in the period 2022 - In 2024, the Applicant's production volume experienced a downward trend of 12.84%. Along with the downward trend in production volume, sales volume Domestic also experienced a decline of 9.23%.

**Production Volume and Capacity Utilization****Table 9. Production Volume, Installed Capacity, and Used Capacity**

Description	Unit	Period			Change (%)		Trend (%)
		2022	2023	2024	2022 – 2023	2023 - 2024	2022 – 2024
Volume Production	Index 100	86.84	75.97		(13.16)	(12.52)	(12.84)
Capacity Installed	Index 100	100	100		-	-	-
Capacity Used	Index 100	86.84	75.97		(13.16)	(12.52)	(12.84)

Source: KPPI Verification Results

33. As seen in Table 9 above, production volume decreased by 12.84% between 2022 and 2024, resulting in a similar decrease in utilized capacity of 12.84%. Meanwhile, installed capacity remained unchanged.

**Production Volume, Labor, Productivity, and Profit/Loss****Table 10. Production Volume, Labor, Productivity, and Financial Losses**

Description	Unit	Period			Change (%)		Trend (%)
		2022	2023	2024	2022 – 2023	2023 - 2024	2022 – 2024
Production Volume Index	100	86.84	75.97		(13.16)	(12.52)	(12.84)
Labor	Index 100	97.14	94.27		(2.86)	(2.95)	(2.91)
Productivity	Index 100	89.40	80.58		(10.60)	(9.86)	(10.23)
Loss Financial	Index (100)	(95.60)	(76.12)		(4.40)	(20.39)	(12.76)

Source: KPPI Verification Results

34. As can be seen in Table 10 above, during 2022 -

In 2024, the workforce experienced a reduction with a trend of 2.91%.

This reduction in workforce is in line with the decline in production which resulted in cost efficiency so that the financial losses experienced by the Applicant decreased annually with a trend of 12.76%.

During the same period, the Applicant's productivity experienced a 10.23% decline. This was due to a much greater decline in production volume than in labor, at 12.84% and 2.91%, respectively.

35. Based on *recital* 32-34, it can be concluded that during 2022 -

2024, the Applicant still experienced serious losses based on performance indicators, namely a downward trend in production, domestic sales, productivity, capacity utilization, workforce, and financial losses.

**C.3.2. National Consumption and Market Share****Table 11. National Consumption, IDN Market Share, and Import Market Share**

Description	Unit	Year			Change (%)		Trend (%)
		2022	2023	2024	2022 - 2023	2023 - 2024	2022-2024
Consumption National	Index 100	91.99	88.30		(8.01)	(4.01)	(6.03)
Market share IDN	Index 100	99.89	106.92		(0.11)	7.04	3.40
Market share Import	Index 100	100.40	74.17		0.40	(26.13)	(13.88)

Source: API, KPPI, processed

36. Based on Table 11 above:

- a. During the period 2022–2024, national consumption tends to experienced a downward trend of 6.03%.
- b. During the 2022–2024 period, the trend of IDN market share tends to increase by 3.40% and the import market share decreases by 13.88%. However, in 2023 compared to 2022 Indonesia's market share decreased by 0.11%. Conversely, import market share increased by 0.40% in the same year.

### C.3.3. Other Factors

37. In addition to the Serious Loss factors above, KPPI also analyzed other factors that caused the Applicant's Serious Loss, as follows:

#### a) National Installed Capacity

**Table 12. Comparison of Applicant's Installed Capacity and National Consumption**

Description	Unit	Year			Change (%)		Trends (%)
		2022	2023	2024	2022-2023	2023-2024	2022-2024
National Consumption to Capacity Applicant Installed	%	78.59	72.29	69.39	(8.01)	(4.01)	(6.03)

Source: API, KPPI Verification Results, processed

38. As seen in Table 12 above, the Applicant's installed capacity is more than enough to meet national consumption so it can be concluded that the Serious Loss experienced by the Applicant is not This is not due to the Applicant's inability, but rather to the continued circulation of imported goods in the domestic market. The proportion of national consumption to the Applicant's installed capacity is 78.59%, falling to 72.29% in 2023 and 69.39% in 2024.

#### b) Quality

39. The quality of the goods produced by the Applicant has met international standards such as *Lloyd's Register Quality Assurance (LRQA) ISO 9001:2015* from the UK and the *OEKO-TEX certificate* from Japan. Thus, the goods produced by the Applicant are able to compete with imported goods in terms of quality because they comply with internationally recognized standards. The goods produced by the Applicant have also been exported to Australia, New Zealand, Sweden, Norway, Finland, Mauritius and the United Arab Emirates with quality that meets the requirements of these countries. Therefore, the Serious Loss experienced by IDN is not caused by low product quality.

### c) Technology

40. Based on the results of the investigation, the Applicant has the latest technology in producing the Investigated Goods. This is supported by the fact that the Applicant's machine is capable of producing the Investigated Goods used for various curtain products and motifs with the latest technology with a machine life of 1-15 years purchased from the PRC under a license from Germany. This shows that the Applicant has suffered serious losses. not due to outdated technology.

### D. STRUCTURAL ADJUSTMENTS

41. Based on PMK No. 54 of 2020 and No. 45 of 2023 concerning the Imposition of BMTP on the import of curtain products (including curtains), blinds, bed nets, and other furniture items, the Applicant has made several structural adjustments in accordance with the commitments in the program plan stated in the final report on the results of the investigation into the imposition of BMTP, as described in the following table:

**Table 13. Realization of Structural Adjustment Implementation**

No	Action Plan	Action Stages	Target (%)	Realization Period 2019 – 2021 (%)	Realization Period 2019 – 2024 (%)
1.	Carry out rejuvenation of production machines	Replacing an old machine with a new machine	100	15	60
		Increase investment in new machines with the latest technology	100	75	90
		Starting production with new machines	100	35	60
2.	Carry out product innovation every year through market development and exhibitions.	Conducting National and International Exhibitions	100	37	50
3.	Increasing HR competency every year with regular training and regeneration.	Conduct regular training to improve HR competency.	100	55	70
<b>Average</b>			<b>100</b>	<b>43</b>	<b>66</b>

Source: KPPI Verification Results

42. Realization of the structural adjustment program that has been carried out by the Applicant can be described as follows:

a. Rejuvenation of production machines:

1) Replace the old machine with a new machine

In the 2019-2024 period, the Applicant replaced old machines with new ones to increase curtain production efficiency by 60%, up from a target of 100%. This target has not been fully achieved because the company

The applicant still suffered financial losses.

2) Increase investment in new machines with the latest technology

In the period 2019 - 2024, the Applicant has increased investment in new machines with new technology by 90% of the target of 100%.

3) Production with new machines

In the period 2019 – 2024, the Applicant has operated 60% of the new machines from the target of 100%.

The low number of realizations of the use of new machines that have been installed is due to low capacity usage.

b. Product innovation every year:

Between 2019 and 2024, the Applicant participated in national and international exhibitions, achieving 50% of the 100% target. This low achievement rate is due to the company's selective participation in exhibitions due to financial constraints.

c. Increasing HR competency every year

In the 2019-2024 period, the Applicant completed 70% of the training program's target of 100%. This suboptimal achievement is due to high employee *turnover* and high training costs.

43. Based on the above, the realization of the structural adjustment program which the Applicant has carried out in the period 2019-2024 with a total of 66% of the 100% target. The applicant has attempted to complete its structural adjustment program commitments, but has not been able to fully realize them due to ongoing financial losses.

44. Based on WTO *Article 7.2 AoS*, in the case of an extension of the TPP, only two conditions are required: IDN is still experiencing serious injury or the threat of serious injury, and IDN still needs additional time to complete structural adjustments. Therefore, in the case of an extension of the TPP, there is no requirement for an increase in imports as a result of unforeseen developments.

and the causal relationship between the surge in imports and the serious loss or threat of serious loss experienced by the Applicant, because both of these are necessary requirements for the imposition of TPP during the initial investigation (*original case*). Based on the explanation in letters B, C, and D above, it can be concluded that:

a. The Applicant's performance data shows serious losses as evidenced by a downward trend in several of the Applicant's performance indicators, including production, domestic sales, productivity, capacity utilization, and workforce, as well as the occurrence of...

financial loss. If the BMTP is not extended, the applicant will experience conditions that can lead to bankruptcy.

- b. The applicant has implemented several structural adjustment programs as stated in the initial investigation (*original case*). However, the applicant still requires additional time to complete the structural adjustments.

If the BMTP is not extended, the applicant will not be able to complete the previously planned structural adjustment program and will again face difficulties competing with imported goods.

#### E. RECOMMENDATIONS

45. Based on the results of the investigation and the fulfillment of the substantive requirements as explained in Sections C.3 (Serious Loss / Threat of Serious Loss) and D (Structural Adjustment), KPPI recommends the imposition of an extension of the BMTP on the import of Curtains (Including Curtains), Indoor Blinds, Bed Mosquito Nets, and Other Furniture Items, with the following amounts and time periods:

**Table 14. Recommendations for Imposing BMTP**

<b>Period</b>	<b>BMTP Specific Duty</b>
Year I	Rp. 9,841/Kg
Year II	Rp. 9,248/Kg

46. In accordance with the provisions of Article 90 of Government Regulation Number 34 of 2011 (PP 34/2011) and *Article 9.1 of the WTO Agreement on Safeguards*, Safeguard Measures are not applied to goods originating from developing countries whose import share does not exceed 3% (three percent) or cumulatively does not exceed 9% (nine percent) of total imports as long as each developing country's import share is less than 3% (three percent).

As explained previously in Table 7, it is concluded that the share of developing countries' imports below 3% cumulatively reached 13.29% of total imports, so there are no exceptions for developing WTO member countries from the imposition of BMTP on product imports as per *recital 45*.

**Jakarta, March 2, 2026**