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International Trade

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An e-newsletter from
Lakshmikumaran & Sridharan, India

April 2020 / Issue – 106

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April
2020

Article

"Reasonable Period of Time" for implementation of rulings and recommendations by DSB

By **Divyashree Suri**

Introduction

In the International trade scenario, World Trade Organization ("**WTO**") provides an operating framework which facilitates free trade between its member-countries. The Dispute Settlement Understanding ("**DSU**") is a legal text containing the rules for dispute settlement in the WTO. The Dispute Settlement Body ("**DSB**") comprising of representatives of all WTO Members, administers the DSU and is responsible for overseeing the entire dispute settlement process. Once the Panel and/or Appellate Body issues their reports in a given dispute, the DSB adopts the report(s), and issues a 'recommendation and ruling' to the country who has violated the WTO law, to bring itself into compliance with the WTO law. These recommendations and rulings are preferably to be adopted immediately after the concerned country communicates its intentions to implement them. However, if the same is not possible, the country is granted a 'reasonable period of time' for such implementation and subsequent compliance.

Article 21.3 of the DSU envisages three different ways in which the reasonable period of time can be determined:

> *"(a) **the period of time proposed by the Member** concerned, provided that such period is approved by the DSB; or, in the absence of such approval,*
>
> *(b) **a period of time mutually agreed by the parties to the dispute within 45 days after the date of adoption** of the recommendations and rulings; or, in the absence of such agreement,*
>
> *(c) **a period of time determined through binding arbitration** within 90 days after the date of adoption of the recommendations and rulings. In such arbitration, a guideline for the arbitrator should be that the reasonable period of time to implement panel or Appellate Body recommendations should not exceed 15 months from the date of adoption of a panel or Appellate Body report. However, that time may be shorter or longer, depending upon the particular circumstances."*

It is interesting to note that the period of time proposed by the Member concerned has never been the approved reasonable period of time. In case the disputing countries cannot reach a mutually agreed upon time-period for implementation, they may resort to arbitration under Article 21.3(c) of the DSU. The reasonable period of time awarded by arbitrators have ranged from 6-15 months.

Ukraine-Russia dispute on reasonable period of time

Article 21.3(c) of the DSU was recently invoked in *Ukraine - Anti-Dumping Measures on Ammonium Nitrate.* In the dispute, following

inconsistencies were noted by the Panel and Appellate Body in the anti-dumping investigation conducted by Ukraine against Russia:

- Ukraine acted inconsistently with Article 2.2.1 of the Anti-Dumping Agreement because it took into account wrongly calculated costs while conducting its ordinary-course-of-trade-test;
- Ukraine failed to calculate the cost of production in the country of origin, i.e. Russia, by using the export price of gas from Russia at the German border adapted for transportation expenses, for the purpose of constructing normal value, as per Article 2.2 of the Anti-Dumping Agreement;
- Ukraine failed to disclose essential facts and give interested parties sufficient time to comment on its disclosure in the interim and expiry reviews, which is in violation of Article 6.9 of the Anti-Dumping Agreement; and
- Ukraine did not exclude EuroChem from the scope of the original anti-dumping measures and from the interim and expiry review determinations, which is in violation of Article 5.8 of the Anti-Dumping Agreement.

The DSB adopted the Panel and Appellate Body Reports on 30th September 2019, and Ukraine informed the DSB that it intended to implement the DSB's recommendation and rulings in this dispute. However, it stated that it would need a reasonable period of time to do the same. Russia requested that the 'reasonable period of time' should be determined through a binding arbitration pursuant to Article 21.3(c) of the DSU, and Mr. Ramirez Hernandez was appointed to act as an arbitrator.

Ukraine argued that there was a two-step process which had to be followed by it in order to implement the recommendations and rulings effectively, for which it needed 27 months. It argued that since this is the first time Ukrainian anti-dumping measures have been found to be inconsistent with WTO law, Ukrainian legislation does not contain a specific procedure to bring the anti-dumping measures in conformity with the DSB's recommendations and rulings. Therefore, firstly, it argued that it would be required to adopt a new law which enables the investigating authorities in Ukraine to conduct a review. Secondly, it would be required to conduct the said review investigation to comply with the rulings.

Russia, on the other hand, argued that Ukraine unduly sought to limit the role of the Arbitrator, since the role of the arbitrator is not limited to validating the timetable proposed by Ukraine. The role of the Arbitrator is to ensure that the shortest period of time is established as the reasonable period of time as a part of "prompt compliance" within the meaning of Article 21.1 of the DSU. Further, Russia stated that the amendment of the existing Ukrainian Anti-Dumping Law is not necessary, since it already incorporates provisions to implement the DSB's recommendations and rulings within two months. Even if a legislative change is warranted, Russia argued that the timeline provided by Ukraine was too long and could be expediated.

The Arbitrator's Award, circulated on 8th April 2020, clarified that while Ukraine has a measure of discretion in choosing the means of implementation, the discretion is not unfettered, and the method should bring Ukraine in compliance with WTO within a reasonable period of time.

It is pertinent to note that Article 21.3(c) states that the period of time recommended by the Arbitrator should not exceed 15 months, subject to 'particular circumstances'. Ukraine submitted that is was facing 'emergency in international relations' since 2014. Such an emergency affects daily life and leads to extraordinary and unexpected delays in procedural actions. While, the Arbitrator's Award accepts the possibility of such a situation qualifying as a 'particular circumstance', however it states that Ukraine's argument was unsubstantiated since no relevant evidence was submitted by it for the same.

With that being said, the Arbitrator's Award went on to note that Ukraine's law allows for the initiation of an administrative review of the anti-dumping measures for the purposes of implementation, through the request of an executive authority, thereby not requiring any legislative changes.[1] Therefore, the Arbitrator's award did not account for the legislative changes that Ukraine proposed to undertake.

Therefore, with only the administrative review left to conduct by Ukraine, in order to ensure compliance, the reasonable period of time which was moot was brought down to 12 months, which was the maximum amount of time foreseen under Ukraine's domestic legislation for an interim review. Ukraine, in this review, is not required to issue new questionnaires, conduct verification visits, or hold a hearing. Given the limited scope of the contemplated administrative review, which will focus on calculating normal value and complying with certain disclosure requirements, the Arbitrator held that 12 months is more than what is reasonably needed for implementation in this dispute. However, taking into account the recent developments in Ukraine relating to the COVID-19 pandemic, the Arbitrator granted Ukraine 11 months and 15 days, from 30 September 2019, to adopt the rulings and recommendations as made by the DSB.

Way forward

Through the said arbitration, it is clear that the 'reasonable period of time' must be as short as possible. In order to achieve the same, it is permissible for countries to eliminate procedures which are not essential, and to expediate the said process. The inability to implement the rulings and recommendations by the DSB in the determined reasonable period of time can result in a compliance dispute against the implementing country under Article 21.5 of the DSU. In order to prevent the same, it is recommended that all Member Countries should have provisions in their trade-remedy legislations to incorporate such compliance requirements.

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[1] Article 20.1, Law against Dumped Imports (Ukraine)

Trade Remedy News

Trade Remedy actions by India

Product	Country	Notification No.	Date of Notification	Remarks
1-Phenyl-3-Methyl-5-Pyrazolone	China PR	F. No. 6/32/2019-DGTR	13-4-2020	Provisional anti-dumping duty recommended
Acetone	Korea RP, Saudi Arabia and Chinese Taipei	7/2020-Cus. (ADD)	15-04-2020	Anti-dumping duty extended till 14-10-2020
All Fully Drawn or Fully Oriented Yarn/Spin Drawn Yarn/Flat Yarn of Polyester	China PR and Thailand	F. No. 07/09/2020-DGTR	15-04-2020	Initiation of anti-dumping sunset review investigation
Copper & Copper Alloy Flat Rolled Products	China PR, Korea RP, Malaysia, Nepal, Sri Lanka, and Thailand	F. No. 6/7/2020-DGTR	20-04-2020	Anti-dumping investigation initiated
Electronic Calculators	China PR	F. No. 7/15/2019-DGTR	26-03-2020	Anti-dumping sunset review – Continuation of ADD recommended
Mono-Ethylene Glycol	Kuwait, Oman, Saudi Arabia, UAE and Singapore	F. No. 6/29/2019-DGTR	6-04-2020	Anti-dumping investigation against imports from Saudi Arabia terminated
New/Unused pneumatic radial tyres having nominal rim dia code above 16”	China PR	F. No. 7/8/2020-DGTR	20-04-2020	Initiation of New Shipper Review investigation for determination of individual CVD Rate for M/s. Shandong Haohua Tire Co. Ltd., China PR

Product	Country	Notification No.	Date of Notification	Remarks
Phenol	--	F. No. 22/3/2019-DGTR	13-04-2020	Termination of Safeguard investigation
Plain medium density fibre board of thickness less than 6 mm	Vietnam, Malaysia, Thailand and Indonesia	F.No. 6/13/2020-DGTR	22-04-2020	Anti-dumping investigation initiated
Polytetrafluoro ethylene (PTFE)	Korea RP	F.No. 07/07/2020-DGTR	16-04-2020	Initiation of Anti-Circumvention investigation concerning alleged circumvention of anti-dumping duty said product originating in or exported from Russia by exports through Korea RP
Polytetrafluoro ethylene (PTFE)	Russia	F.No. 07/10/2020-DGTR	16-04-2020	Initiation of Mid-Term Review investigation

Trade remedy actions against India

Product	Country	Notification No.	Date of Notification	Remarks
Fine Denier Polyester Staple Fiber	United States of America	85 FR 18916 [C-533-876]	03-04-2020	Preliminary Results of Countervailing Duty Administrative Review
Finished Carbon Steel Flanges	United States of America	85 FR 18193 [C-533-872]	01-04-2020	Final Results of Countervailing Duty Administrative Review, 2016-2017
Finished Carbon Steel Flanges	United States of America	85 FR 21391 [A-533-871]	17-04-2020	Final Results of Antidumping Duty Administrative Review; 2017-2018
Forged Steel Fittings	United States of America	85 FR 17536 [C-533-892]	30-03-2020	Preliminary Affirmative Countervailing Duty Determination, and Alignment of Final Determination with Final Antidumping Duty Determination
Lined Paper Products	United States of America	85 FR 19434 [A-533-843]	07-04-2020	Final Results of Antidumping Duty Administrative Review and Final Determination of No Shipments; 2017-2018

Statute Update

Temporary changes in the trade remedy investigation processes due to COVID-19 pandemic

In light of the nation-wide lockdown declared in India over the COVID-19 pandemic, the DGTR has issued Trade Notice No. 1/2020, dated 10-04-2020 which allows temporary procedural relaxations and changes in trade remedy investigations. This allows interested parties to apply for and participate in investigations, as well as enables the officers of the DGTR to efficiently and effectively conduct investigations. It has identified the following areas of concern in trade remedy investigations:

i. *Filing of applications/submissions/documents:* DGTR has waived the requirement of filing hard copies of submissions. All submissions, applications and communications may be signed, scanned and emailed to the DGTR. The PDF/MS Word documents should be searchable, and data files should be in MS Excel format.
ii. *Oral Hearings/Consultations:* Oral hearings and consultations are to be held through video conferencing. The filing of any submissions post the hearing must be done in the manner indicated for all submissions and communications.
iii. *Verification of information:* Since on-site verification shall not be possible, all interested parties should provide all supporting data/information in respect of the submissions made to DGTR. All supplementary information shall also be provided with the applications/questionnaire response.

The DGTR also reserves the right to waive any other prescribed procedural requirement as and when required. The Trade Notice is valid till 30-06-2020.

Anti-dumping sunset reviews - Timelines for filing sunset review applications revised

The time limit for filing an SSR application has been either 270 days prior to expiry of measure or 240 days prior to expiry of measure with justification of delay. However, the DGTR received several representations from the domestic industry that on account of unavoidable circumstances, they are unable to adhere to the prescribed timeline. Keeping that in mind, the DGTR has amended Trade Notice 02/2017 dated 12th December 2017 vide Trade Notice 02/2020 dated 20th April 2020, to relax the prescribed timeline. The petition may now be accepted up to 180 days prior to the date of expiry of the measure, provided the Designated Authority is satisfied with the genuineness of the difficulty faced by the domestic industry in meeting the 270 days deadline. In 'exceptional circumstances', the Designated Authority may further relax the timeline to up to 120 days prior to the expiry of the measure.

WTO News

Export restrictions in response to COVID-19 crisis growing – IMF and WTO heads call for lifting curbs

80 countries and separate customs territories have introduced export prohibitions or restrictions as a result of the COVID 19 pandemic. According to WTO report in this regard, the products covered by these new export prohibitions and restrictions vary considerably. While most are focused on medical supplies (e.g. facemasks and shields), pharmaceuticals and medical equipment (e.g. ventilators), others have extended the controls to additional products, such as foodstuffs and toilet paper. As per the report while exporters risk losing out in the long run as lower domestic prices will reduce the incentive to produce the good domestically, and the higher foreign price creates an incentive to smuggle it out of the country, both of which may reduce domestic availability of the product. Then there is also the fear of triggering a domino effect. It may be noted that the Report dated 23-04-2020 also highlights the fact that transparency at the multilateral level is lacking. In fact the DG has on 17-04-2020 in the virtual meeting of all WTO Members urged Members to submit information about pandemic-related trade measures to the WTO Secretariat's ongoing monitoring exercise.

It may be noted that as per another WTO report, while Germany, United States and Switzerland supply 35% of medical products, China, Germany and the United States export 40% of personal protective products.

Meanwhile, the IMF and WTO heads have, in a joint statement released on 24-04-2020 called for governments to refrain from imposing export and other trade restrictions on key medical supplies and food and to quickly lift those put in place since the start of the year. Ms. Georgieva and Mr. DG Azevêdo also expressed concern with the decline in the supply of trade finance, which ensures that imports of food and essential medical equipment reach the economies where they are most needed. Deputy Director-General Alan Wolff had on 20-04-2020 also underlined the importance of global policy coordination to ensure an adequate supply of medicines and medical products to affected countries.

Ukraine-Russia dumping dispute - WTO Arbitrator determines "reasonable period of time"

On 8 April 2020, an Arbitrator issued an award pertaining to the "*Ukraine - Anti-Dumping Measures on Ammonium Nitrate*" dispute. It adjudicated that the reasonable period of time for Ukraine to implement the DSB's recommendations is 11 months and 15 days from the adoption of the reports. The arbitrator was of the view that given the limited scope of the contemplated administrative review, which will focus on calculating normal value and complying with certain disclosure requirements, 12 months is more than that is reasonably needed for implementation in this dispute.

Egypt launches safeguard investigation on raw aluminium

Egypt has notified the WTO's Committee on Safeguards that it has initiated on 16-4-2020 a safeguard investigation on imports of raw aluminium. Interested parties must make themselves known to the investigating authority within a period of 30 days after the initiation of the investigation.

India Customs & Trade Policy Update

Foreign Trade Policy extended till 31-3-2021 – Last dates for various obligations relaxed

Foreign Trade Policy 2015-20 and the Handbook of Procedures Vol. 1, which were expiring on 31st of March 2020, have been extended till 31st of March 2021. DGFT has in this regard, with immediate effect, also made various other changes in the FTP and in the HoP, extending the validity and time periods of various provisions and thus granting relief to the exporters and importers in the present troubled times. Notification No. 57/2015-20 and Public Notice No. 67/2015-20, both dated 31-3-2020 have been issued for the purpose. Some of the important changes are highlighted below.

MEIS Scheme

- Exports for which Let Export Order (LEO) date is between 1-2-2019 and 31-5-2019, the applications can be filed within 15 months from LEO date, instead of 12 months.

Service Export from India Scheme (SEIS)

- Services which will be eligible for the SEIS Scheme for exports during 1-4-2019 to 31-3-2020 will be notified later under Appendix 3X.
- Decision to continue the SEIS Scheme for the exports from 1-4-2020 onwards, will be taken later.
- Last date for filing SEIS application for exports made during 2018-19 will be 31-12-2020, instead of 31-3-2020.

Advance Authorisation Scheme

- IGST & Compensation cess exemption has been extended up to 31-3-2021
- Wastage norms fixed under para 4.07 of HBP will now be valid till 31-3-2021, or for a period of three years from the date of fixation, whichever is later.
- Import validity and Export Obligation period, wherever expires between 1-2-2020 to 31-7-2020, the same has been extended by 6 months from date of expiry. Further, no separate application with composition fee, amendment or endorsement is required for such extension. It may be noted that Policy Circular No. 35/2015-20, dated 23-04-2020 in this regard provides for procedure for extension of import validity period and export obligation period.
- In case the last date for filing an application for Replenishment AA falls between 1-2-2020 to 31-7-2020, the same will get extended by 6 months.
- Under the Import of Diamonds for Certification/Grading & Re-export Scheme, and Exports against Supply by Foreign Buyer, in case the last date for export falls between 1-2-2020 to 31-7-2020, the same will get extended by 6 months. Further, last date under para 4.80 if is expiring between 1-2-2020 and 31-7-2020, it shall also get extended by six months.

RoSCTL Scheme

- Last date for filing RoSCTL (Rebate of State and Central Levies and Taxes)

application for shipping bills having LEO date from 7-3-2019 to 31-12-2019, has been extended from 30-6-2020 to 31-12-2020.

DFIA Scheme

- All DFIAs (including transferable DFIAs), where the validity for import is expiring between 1-2-2020 to 31-7-2020, the validity stands extended by six months from the date of expiry. It may be noted that Policy Circular No. 35/2015-20, dated 23-04-2020 in this regard provides for procedure for extension of import validity period and export obligation period.

EPCG Scheme

- IGST & Compensation cess exemption has been extended up to 31-3-2021.
- Import validity, wherever expires between 1-2-2020 to 31-7-2020, the same will get automatically extended by 6 months from date of such expiry.
- In case due date for filing the installation certificate falls between 1-2-2020 to 31-7-2020, the same will get extended by 6 months from the original due date.
- If blockwise EOP (Export Obligation Period) expires between 1-2-2020 to 31-7-2020, the same stands extended by 6 months from the date of such expiry. EOP has also been extended in same manner. Refer changes in para 5.14 and 5.17 of the HoP.

EOU Scheme

- Validity period of LOP/LOI which are expiring on or after 1-3-2020, have been extended up to 31-12-2020.
- IGST & Compensation cess exemption extended up to 31-3-2021
- QPR for quarter ending March, 2020 and June, 2020 & APR for Financial Year 2019-20 can now be filed till 30-9-2020.
- EOP for certain commodities under para 6.06(c) of HoP, in case expires between 1-3-2020 to 30-6-2020, it would be deemed to be valid up to 30-9-2020.

Miscellaneous changes

- Validity of Status holder certificate has been extended up to 31-3-2021.
- Where the due date for filing application to claim TED refund/Deemed export duty drawback falls on or after 1-3-2020, the same has been extended up to 30-9-2020.
- Application for claiming benefits under the Transport and Marketing Assistance for Specified Agriculture Products Scheme for the quarter ending 31-3-2019 and 30-6-2019, can be filed till 30-9-2020.
- Late cut fee under para 9.02 must only be imposed on application filed after expiry of due date prescribed under the PN 67/2015-20 dated 31-3-2020.

Ventilators, PPE, masks and COVID-19 testing kits - Exemption from BCD and health cess

In light of the COVID-19 health crisis, the CBIC has exempted the import of respiration apparatus (ventilators), personal protection equipment, face and surgical masks, and COVID-19 testing kits from the whole of BCD and health cess. Inputs required for the manufacture of these products have also been exempted from the whole of BCD

and health cess, subject to the importer following the procedure set out in the Customs (Import of Goods at Concessional Rate of Duty) Rules, 2017. Notification No. 20/2020-Cus., dated 09-04-2020 issued for the purpose will remain in force till September 30, 2020.

Customs clearance - Acceptance of undertakings in lieu of Bonds

In order to expedite the Customs clearance of goods during the COVID-19 pandemic, the CBIC has relaxed the requirement to submit bonds prescribed under Section 18, Section 59 and Section 143, and under notifications issued under Section 25 of the Customs Act, 1962, subject to compliance of certain specified conditions. The aforesaid relaxation will be available to the Government, Public Sector Undertakings, actual user importer, Authorised Economic Operators, Status Holders and importers availing warehouse facility in terms of Section 59 of the Customs Act. The relaxation will be available against submission of an undertaking having same contents as those of a prescribed bond. According to Circular No. 17/2020-Cus., dated 3-4-2020 read with Circular No. 21/2020-Cus., dated 21-4-2020, the requirement for submission of bonds has been relaxed till 15-04-2020. However, the undertaking should be duly replaced with a proper bond by 30-05-2020. This will be subject to review by the Board at the end of the lockdown period.

FTAs - Provisional clearance where original Certificate of Origin is not furnished

The DGFT had issued Trade Notice No. 62/2019-2020 dated 6th April 2020 to address the difficulties being faced by importers in producing the original Certificates of Origin (COO) on account of disruptions caused by the Covid-19 pandemic. The aforesaid Trade Notice provides that the benefit of concessional rate of duty claimed under a Free Trade Agreement will be allowed on provisional basis, in case an importer produces a digitally signed COO or a physical COO not signed by the competent authority. In order to enforce the said Trade Notice, the CBIC has directed the customs authorities to provisionally assess such import consignments in terms of Section 18 of the Customs Act, 1962. As per Circular No. 18/2020-Cus., dated 11-04-2020, the provisional assessment will be finalised once the original signed COO is submitted by the importer.

Ratio Decidendi

Anti-dumping duty – De-minimis market share in imports – Threshold of 1% when not hard

European Union's General Court has upheld the EU authority's decision to terminate the proceedings concerning imports of iron, non-alloy or other alloy steel from Serbia on the sole basis of volumes of imports and average sales price data, and without analysing data on undercutting and underselling. The Court rejected the plea that since the volumes of imports from Serbia represented a market share of 1.04%, it exceeded the 1% threshold laid down in Article 5(7) of the EU's Basic Regulation, and hence the Commission erred in not subjecting the imports

from Serbia to cumulative assessment along with other 4 specified countries. The applicant had plead that 1% threshold laid down in Article 5(7) is a clear and hard threshold, above which volumes are not 'negligible'. The EU authorities were of the view that the 1.04% is still negligible because 0.04% should be regarded as immaterial, in particular when, in relative terms, Serbian import volumes are considerably lower than the volumes from each of the four other countries. Upholding the view, the Court held that the Commission did not commit a manifest error of assessment when it took the view that the volume of imports from Serbia remained negligible within the meaning of Article 3(4) of the Basic Regulation, despite the increase in the level of imports from 0.48% in 2013 to 1.04% during the investigation period. [*Eurofer, European Steel Association, AISBL* v. *European Commission* – Judgement dated 12-03-2020 in Case T-835/17, European Union General Court]

Valuation – Price at which goods sold after import when not relevant

Court of Justice of the European Union has held that the fact that goods imported into the European Union were sold at a loss (at a price lower than the CIF import price as in the customs declaration) is not in itself a sufficient ground for a finding that CIF import price was not correct. The Court noted that the importer had proved that all the conditions under which the consignment of those goods took place confirmed that the price was correct. The case involved a dispute where additional duties were payable on the import of a concerned product if its CIF import price was less than the trigger price referred to in Article 141(1)(a) of the Single CMO Regulation. [*X BV* v. *Staatssecretaris van Financiën* – Judgement dated 11-03-2020 in Case C-160/18, CJEU]

Self-heating patches and belts classifiable under Heading 3005 and not under 3824

Self-heating patches or belts to relieve pain made of a soft synthetic material conforming to the body's shape which contains a number of discs filled with iron powder, charcoal, salt and water which, on exposure to the air, generate heat as a result of an exothermic reaction, are classifiable under Heading 3005 and not under Heading 3824 of the EU's Common Customs Tariff. The Court of Justice of the European Union in this regard was of the view that that goods specifically designed to prevent, detect or treat illnesses or injuries relate to 'medical purposes' within the meaning of Heading 3005. [*Pfizer Consumer Healthcare Ltd.* v. *Commissioners for Her Majesty's Revenue and Customs* – Judgement dated 26-03-2020 in Case C–182/19, CJEU]

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