HUSCH BLACKWELL

CASE STUDY

Gharda Chemicals International

OVERVIEW

For several years, Gharda Chemicals International (Gharda), an Indian exporter of CVP-23 pigment, had been subject to adverse facts available (AFA) margins exceeding 20% and 25% under the antidumping and countervailing duty (AD/CVD) order on CVP-23 from India. These margins effectively shut the company out of the U.S. market. Seeking a path to entry, Gharda turned to Husch Blackwell to develop a strategic approach to the administrative review process administered by the U.S. Department of Commerce.

Services

International Trade & Supply Chain
International Trade Remedies

Legal Team

Nithya Nagarajan

Challenges

Participating meaningfully in AD/CVD administrative reviews requires careful planning, significant operational commitment, and deep familiarity with the procedural demands imposed by Commerce. For an exporter previously subject to AFA margins—applied when a respondent fails to provide adequate and timely information—the path back to favorable rates requires demonstrating full cooperation and making sufficient export volumes to qualify for review participation. Navigating these requirements while managing the demands of briefing cycles and Commerce's verification process presents a formidable challenge, particularly for companies with limited prior exposure to the U.S. trade remedy system.

Solution

Husch Blackwell's international trade team, led by Nithya Nagarajan, began advising Gharda on a multi-year strategy to systematically reenter the U.S. market. The team worked closely with the company to ensure it could qualify for participation in both the antidumping and countervailing duty administrative reviews. In the AD review, the team guided Gharda through Commerce's questionnaire process, verification, and briefing stages, positioning the company to demonstrate full cooperation and secure a favorable margin. In the parallel CVD review, Gharda was selected as a mandatory respondent, and the Husch Blackwell team managed the full scope of that proceeding—from initial questionnaire responses through preliminary results and post-preliminary briefing—to advance the lowest CVD rate among all Indian exporters.

Result

Husch Blackwell secured a 0% antidumping margin and a sub-3% countervailing duty rate for Gharda Chemicals International—the lowest rates among all Indian competitors in the CVP-23 market. Having previously faced adverse margins exceeding 20% and 25% that effectively barred it from the U.S. market, the exporter is now positioned to significantly expand its U.S. presence through strategic participation in the AD/CVD administrative review process.