

amicus

An e-newsletter from
Lakshmikumaran & Sridharan, India

October 2019 / Issue – 100

Dear Reader

It gives me great pleasure to address you through this **100th issue of International Trade Amicus**. I have always believed that the wealth of knowledge should be shared. We began this journey in May 2011 recalling the Sanskrit verse that the unique wealth of knowledge increases with spending or expending. I hope over these years we have been able to give business critical inputs and academic inputs in a timely manner. These days information is available practically everywhere but value addition results when relevant information is properly digested and communicated in a systematic manner. We intend to continue this endeavour. Your feedback to improve the newsletter is welcome.

Thank you.

Warm regards

V. Lakshmikumaran

Contents

Article

Regional Comprehensive Economic Partnership (RCEP): India's concerns... 2

Trade Remedy News

Trade remedy measures by India 4

Trade remedy measures against India 7

WTO News 7

India Customs & Trade Policy

Update..... 8

Ratio Decidendi 9

News Nuggets 10

October
2019



Article

Regional Comprehensive Economic Partnership (RCEP): India's concerns

By Greetika Francis

The mega trade agreement amongst ASEAN and its FTA partners, the Regional Comprehensive Economic Partnership, is slated for conclusion by November 2019. With signatories including ASEAN (Brunei, Cambodia, Indonesia, Laos, Malaysia, Myanmar, the Philippines, Singapore, Thailand, Vietnam), Australia, China, India, Japan, Korea and New Zealand, the mega FTA is expected to cover almost half the world's population and about 39% or more of the world's GDP.¹ The ambitious FTA also has enhanced coverage in terms of subject areas with chapters covering substance and procedure regarding market access on Trade in Goods, Trade in Services and Investment as well as Rules of Origin, Intellectual Property and Electronic Commerce.²

As per leading news sources and from India's perspective, three issues remain unresolved at this climactic stage.³ These issues

and their origin are discussed in detail in this article.

I. *The proposed Investor-State Dispute Settlement (ISDS) mechanism under the Investment Chapter*

India is opposed to the introduction of ISDS owing to its recent experience pursuant to various bilateral investment treaties. Following its first defeat in investment arbitration in the *White Industries v. India*⁴ case in 2011, India's approach to ISDS underwent a sea-change. It also faced numerous fresh claims, with about twelve ongoing disputes under various BITs as of date.⁵ Learning from this experience and after a detailed review of its bilateral investment treaties (BITs), India introduced a revised *Model Text for the Indian Bilateral Investment Treaty* in December 2015.⁶ As per the Press Release, the Model Text introduced "a refined *Investor State Dispute Settlement (ISDS) provision requiring*

¹ Press Release, Ministry of Commerce and Industry, "Stakeholders' Consultations by Department of Commerce on RCEP" dated 24 August 2019 (available at www.pib.nic.in)

² Press Release, Ministry of Commerce and Industry, "Piyush Goyal to Attend 9th RCEP Intersessional Ministerial Meeting in Thailand" dated 10 October 2019 (available at www.pib.nic.in)

³ "Threat to agri sector, data localisation, China's influence keep India wary of RCEP deal", Business Today dated 18 October 2019 (available at: <https://www.businesstoday.in/current/economy-politics/threat-to-agri-sector-data-localisation-china-influence-keep-india-wary-of-rcep-deal/story/385488.html>); "RCEP: India wants auto-trigger mechanism to curb import surges", Business Line dated 24 August 2019 (available at: <https://www.thehindubusinessline.com/economy/rcep-india-wants-auto-trigger-mechanism-to-curb-import-surges/article29241238.ece>); "India tries to loosen RCEP tangle ahead of Leaders Summit on November 4", Business Line dated 21 October 2019 (available at:

<https://www.thehindubusinessline.com/economy/india-tries-to-loosen-rcep-tangle-ahead/article29756763.ece>)

⁴ *White Industries Australia Limited v. The Republic of India*, UNCITRAL, under the Agreement between the Government of Australia and the Government of the Republic of India on the Promotion and Protection of Investments (1999) (Final Award available at <https://www.italaw.com/sites/default/files/case-documents/ita0906.pdf>)

⁵ List of Investment cases against India available at: <https://investmentpolicy.unctad.org/investment-dispute-settlement/country/96/india/respondent>

⁶ Press Release, Ministry of Finance, "Model Text for the Indian Bilateral Investment Treaty" dated 16 December 2015 (available at www.pib.nic.in)

investors to exhaust local remedies before commencing international arbitration and limiting the power of the tribunal to awarding monetary compensation alone.”

Generally, RCEP members appear to have had an adverse experience with ISDS with a total of 32 outstanding cases, majority of them against India, Japan and Korea.⁷ Accordingly, there has been substantial speculation that the RCEP members have agreed to drop ISDS from the scope of negotiations, with a clause to allow introduction of ISDS two years after the Agreement’s ratification. The Malaysian Minister for International Trade and Industry (MITI) has made statements to this effect last month.⁸ However, the possibility of reintroduction of ISDS within two to five years of ratification remains and India’s ability to safeguard against the same remains under question. A related concern for the negotiators is the continued ability to attract foreign investment under RCEP without an assured ISDS mechanism.

II. *The proposed Rules of Origin chapter*

India has proposed very strict Rules of Origin, with a view to prevent circumvention of Chinese goods through other RCEP member territories. This is relevant considering that there is speculation that India may have restricted the market access commitments to China as compared to other RCEP members.

⁷ List of Investment Cases against RCEP Members verified from <https://investmentpolicy.unctad.org/investment-dispute-settlement/>

⁸ “RCEP talks to proceed without ISDS”, The Malaysian Reserve dated 13 September 2019 (available at: <https://themalaysianreserve.com/2019/09/13/rcep-talks-to-proceed-without-isds/>)

Rules of Origin (ROO) are a sensitive subject matter in any negotiation owing to the following:

- Market access, once granted, can only be reigned in by way of the rules of origin contained in the agreement;
- They require a fine balance- allowing permissive rules for goods which India is an exporter of and restrictive rules for goods which India is an importer of.

Under the RCEP, different levels of tariff liberalization are being negotiated by India with respect to ASEAN on the one hand and China on the other. As such, ROO which permits value addition to take place in any RCEP member (or, by extension, FTA partners of a RCEP member) for the purpose of availing the preferential tariff assigned to the country of export would defeat the whole purpose of such differential tariff liberalization.

India’s ROO proposal attempts to address this issue. However, with the conclusion of the 7th Intersessional Meeting of the Regional Comprehensive Economic Partnership (RCEP) Trade Negotiating Committee (TNC) held in Bangkok from 14-19 October 2019, there appears to be no finality on this issue yet. It is also questionable whether non-acceptance of the stricter ROO would reopen market access negotiations amongst RCEP members.

III. *The proposed Auto-Trigger and Snapback Safeguard Mechanism under the Trade Remedies chapter*

The biggest fear with signing onto the RCEP has been the surge in imports, particularly from China and also with respect to certain sensitive sectors (like dairy) from Australia and New Zealand as well. In order to address the expected surge in imports, India has proposed an auto trigger and snapback

safeguard mechanism which would ensure some degree of protection to the Indian industry.

The proposed mechanism is expected to “auto-trigger” when imports from any of the RCEP members with respect to identified and negotiated sensitive items increase beyond a pre-negotiated trigger level within a specific duration and tariff concessions extended under RCEP are withdrawn and most-favoured-nation level of tariffs reinstated for the said RCEP member. Additionally, the “snapback” mechanism is expected to permit transitional safeguards, applicable for a period even after the completion of tariff liberalization under the RCEP.

India has faced strong opposition from most members with respect to this proposal and no consensus seems likely before the ministerial meeting for Ministers of the RCEP Members scheduled to be held on 1 November, 2019 in Bangkok, Thailand ahead of the Leaders Summit scheduled for 4 November, 2019.

Expectations from RCEP

In light of the significant issues still remaining to be negotiated by the RCEP members, it appears to be almost impossible to conclude the RCEP in the timelines agreed without remarkable backtracking, on the part of India or the other RCEP members. The protests from the agricultural and dairy sector are also finding more and more support as the negotiations come to a close, and the strength of India’s stance for supporting its proposals may be derived from this ground reality as well. Added incentive to delay signing of the RCEP is also presented by the ongoing India-US Strategic Partnership, which broadly opposes inclusion of China in the mega FTA.

Ultimately, the outcome of negotiations will only become evident at the leaders' summit scheduled for November 4 where India’s stance on RCEP will be announced.

[The author is Principal Associate in International Trade Practice, Lakshmikumaran & Sridharan, New Delhi]



Trade Remedy News

Trade Remedy actions by India

Product	Country	Notification No.	Date of Notification	Remarks
Acrylic Fibre	Thailand	F.No. 7/18/2019-DGTR	30-09-2019	Initiation of Anti-dumping Sunset Review investigation
Acrylic Fibre	Belarus, Ukraine, European Union, Peru	F.No.No.6/25/2019-DGTR	24-09-2019	Initiation of Anti-dumping investigation

Product	Country	Notification No.	Date of Notification	Remarks
Choline Chloride in all forms	China PR, Malaysia, Vietnam	F.No.6/18/2019 -DGTR	01-10-2019	Initiation of Anti-dumping investigation
Clear Float Glass	Malaysia	F.No.6/14/2019 -DGTR	01-10-2019	Initiation of Countervailing duty investigation
Digital Offset Printing Plate	China PR, Japan, Korea RP, Taiwan, Vietnam	F.No.6/7/2019-DGTR	03-10-2019	Preliminary Findings recommend imposition of provisional anti-dumping duty
Ductile Iron Pipes	China PR	39/2019-Cus. (ADD)	28-09-2019	Rescinds Notification No.23/2013-Cus. (ADD), pursuant to order of the Supreme Court in Civil Appeal No.6678 of 2019
Electronic Calculators	Malaysia	F.No.6/22/2019 -DGTR	24-09-2019	Initiation of Anti-dumping investigation
Electronic Calculators	China PR	F.No.7/15/2019 -DGTR	24-09-2019	Initiation of Sunset Review Anti-dumping investigation
Faced Glass Wool in Rolls	China PR	F.No.6/23/2019 -DGTR	24-09-2019	Initiation of Anti-dumping investigation
Flat Products of Stainless Steel	Indonesia	F.No.6/16/2019 -DGTR	18-10-2019	Initiation of Countervailing duty investigation
Flat rolled product of steel, plated or coated with alloy of Aluminium and Zinc	China PR, Vietnam, Korea RP	40/2019-Cus. (ADD)	15-10-2019	Imposition of provisional anti-dumping duty
Glass Fibre and articles thereof	China PR	F.No.7/17/2019 -DGTR	04-10-2019	Initiation of a Mid-Term Review investigation to examine product scope
High-Speed Steel of Non-Cobalt Grade	Brazil, China PR, Germany	38/2019-Cus. (ADD)	25-09-2019	Imposition of definitive anti-dumping duty

Product	Country	Notification No.	Date of Notification	Remarks
Hot Rolled Flat Products of Stainless Steel- 304 grade	China PR, Malaysia, Korea RP	F.No.7/16/2019 -DGTR	03-10-2019	Initiation of Sunset Review Anti-dumping investigation
Jute Products	Bangladesh, Nepal	F.No.7/25/2018 -DGAD	03-10-2019	Final Findings recommending imposition of anti-dumping duty for New Shipper M/s. Aziz Fibres Ltd. on the basis of residual rates
		F.No.7/24/2018 -DGAD		Final Findings recommending imposition of anti-dumping duty for New Shipper M/s. Natore Jute Mills and M/s. PNP Jute Trading LLC on the basis of residual rates
		F.No.7/7/2018-DGAD	19-09-2019	Final Findings recommending imposition of anti-dumping duty for New Shipper M/s. Roman Jute Mills Ltd. and M/s. SMP International LLC on the basis of residual rates
Paracetamol	China PR	F.No. 7 / 16 / 2018-DGAD	15-10-2019	Final Findings recommends discontinuation of definitive anti-dumping duty after third sunset review
Phthalic Anhydride	Korea RP	F.No.22/8/2019 -DGTR	01-10-2019	Initiation of Bilateral Safeguard Investigation under India-Korea Comprehensive Economic Partnership Agreement (Bilateral Safeguard Measures) Rules, 2017
Polyethylene Terephthalate	China PR	F.No.6/24/2019 -DGTR	01-10-2019	Initiation of Anti-dumping investigation
Saturated Fatty Alcohols	Indonesia, Malaysia, Thailand, Saudi Arabia	F.No.7/38/2018 -DGTR	24-09-2019	Final Findings recommending imposition of anti-dumping duty for New Shipper M/s. PT Energi Sejahtera Mas and M/s. Sinarmas Cepsa Pte Ltd. on the basis of their individual assessment
Single Mode Optical Fibre	All Countries	F.No.22/5/2019 -DGTR	23-09-2019	Initiation of Safeguard investigation

Trade remedy actions against India

Product	Country	Notification No.	Date of Notification	Remarks
Frozen Warmwater Shrimp	United States of America	84 FR 51114 [A-533-840]	27-09-2019	Notice of Final Results of Antidumping Duty Changed Circumstances Review
Oil Country Tubular Goods	Canada	OS 2019 RI	27-09-2019	Notice of Re-investigation and Schedule for Re-investigation
Quartz Surface Products	United States of America	84 FR 54838 [C-533-890]	11-10-2019	Preliminary Affirmative Countervailing Duty Determination
Stainless Steel Bar	United States of America	84 FR 56179 [A-533-810]	21-10-2019	Final Results of Administrative Review of the Antidumping Duty Order; 2017-2018



WTO News

Airbus subsidy dispute - USA allowed to impose countermeasures on EU

On 14 October, WTO members agreed at a meeting of the Dispute Settlement Body (DSB) to authorize the United States to impose countermeasures on European Union goods and services trade with the US up to a value of USD 7,496.623 million annually. The authorization was granted in line with the decision of the WTO arbitrator issued on 2 October regarding the level of countermeasures that US may request with respect to the dispute “*European Communities and Certain Member States — Measures Affecting Trade in Large Civil Aircraft*” (DS316). The arbitration panel had earlier held that the European Union did not demonstrate that the United States failed to follow the principles and

procedures set forth in Article 22.3 of the DSU in determining that it is not practicable or effective to suspend concessions or other obligations in trade in goods. It may be noted that at present European Union is also pursuing a similar dispute against USA in respect of subsidies provided by the latter to Boeing.

Panel established to review Turkish pharmaceutical measures – USA and Tunisia also request establishment of panels

On 30 September, in a meeting of the Dispute Settlement Body (DSB), WTO members agreed to EU’s request for a dispute panel to review various measures taken by Turkey with respect to the production, importation and marketing of pharmaceutical products in Turkey. Japan, USA,

Canada, Switzerland, Russia, Ukraine, China, Brazil and India have reserved their third party rights to participate in the proceedings (DS583).

WTO members also considered a request by the United States to review India's additional tariffs on certain goods imported from US (DS585). The additional duties were imposed by India on certain goods from USA and were in response to US safeguard measures on imports of steel and

aluminium. This was the first request of USA for a panel.

A request from Tunisia to review Morocco's anti-dumping measure on imported school books (DS578) was also considered. According to Tunisia, Morocco acted inconsistently with a number of provisions under the WTO's Anti-dumping Agreement and the GATT 194. This is the first time Tunisia has initiated a WTO dispute.



India Customs & Trade Policy Update

Steel Import Monitoring System - DGFT clarifies : DGFT has clarified on number of issues relating to the new Steel Import Monitoring System (SIMS) which will be effective from 1st of November, 2019. As per Policy Circular No. 29/2015-20, dated 4-10-2019, SIMS will not be applicable on-air freighted goods and on returnable steel goods imported temporarily.

This mandatory registration is also applicable to imports under Advance authorization, DFIA and import to SEZs and such registration can be taken for one or more items with multiple HS Codes. Any number of consignments can be imported by a single registration within the validity of the registration. According to the circular, a reasonable variation of 5% to 10% in actual CIF value and stated CIF value is permissible.

Manufacture and other operations in warehouse under Customs Section 65 clarified : CBIC has issued Circular No. 34/2019-Cus. and the Manufacture and Other Operations in Warehouse (No. 2) Regulations, 2019 to cover

the procedures and documentation for units operating under Section 65 of the Customs Act, 1962 in a comprehensive manner, including application for seeking permission under Section 65, provision of execution of the bond by the licensee, receipt, storage and removal of goods, maintenance of accounts, conduct of audit, etc. Consequently, the Warehouse (Custody and Handling of Goods) Regulations, 2016 and Warehoused Goods (Removal) Regulations, 2016 have been amended by notifications dated 1-10-2019 to exclude their application for warehouses operating under Section 65.

While the form for application under Section 65 is prescribed in Annexure A of the Circular, licensees manufacturing or carrying out other operations in a bonded warehouse shall be required to maintain records as per form prescribed in Annexure B. The application form is so designed that the process for seeking grant of license as a private bonded warehouse as well as permission to carry out manufacturing or other operations stands integrated into a single form. The Circular issued on 1-10-2019 also clarifies

that imported goods that are exempt from duty or are chargeable to nil rate of duty, may be brought into the warehouse, upon filing a bill of entry for home consumption and clearance, at the customs station of import. The Circular also talks about payment of GST on clearance of resultant product for domestic consumption and non-availability of any exemption in respect of domestic procurement just by virtue of working under Section 65. To facilitate timely clearances for continuous nature of operations in warehouse, it is provided that while the licensee shall file the due documentation and pay duties due and prior permission of proper officer is not an essential condition for the removal of warehoused goods.

Import and export of electronic cigarettes and parts or components thereof prohibited: The import and export of electronic cigarettes (e-cigarettes) and parts or components thereof including all forms of Electronic Nicotine Delivery Systems, Heat Not Burn Products, e-Hookah and like devices, falling under HS 8543 has been prohibited in accordance with the Prohibition of Electronic Cigarettes (Production, Manufacture, Import, Exports, Transport, Sale, Distribution, Storage and Advertisement) Ordinance, 2019. However, it may be noted that the said prohibition will not apply to any product licensed under the Drugs and Cosmetics Act, 1940. DGFT has issued Notification No. 20/2015-20, dated 26-9-2019 and Notification No. 22/2015-20 dated 30-9-2019 to amend the ITC(HS) Import Policy and ITC(HS) Export Policy, respectively.



Ratio Decidendi

No late fee for delay in filing Bill of Entry where importer takes all efforts to clear goods within reasonable time: CESTAT Chennai has held that late fee imposed on the appellant for delay in filing of Bill of Entry was not proper, since the delay had occurred only because the original importer had failed to clear the goods. The Tribunal observed that present importer had taken efforts to get the IGM amended, get the earlier Bill of Entry cancelled within a reasonable time and filed the new Bill of Entry within three days from the cancellation order of the earlier Bill of Entry, and hence could not be saddled with the late fee. CBIC's standing order that the late charges due to delay in filing the Bill of Entry has to be considered judiciously, was also relied

upon. [*ECOM Gill Coffee Trading Pvt. Ltd. v. Commissioner* - Final Order No. 41155/2019, dated 30-9-2019, CESTAT Chennai]

Prior contract for import does not affect validity of amendment to import policy: The Petitioners had entered into contract to import yellow peas from an exporter in Singapore. Notifications were issued by the Central Government later amending the Import Policy, restricting the import of peas. Petitioner contended that these notifications could not be applied retrospectively as it had already entered into contracts for import of peas and the same are to continue till March, 2020. Rajasthan High Court however held that the notifications under challenge cannot be said to be retrospective,

merely because they are likely to affect agreements entered into prior to the date of notification. The Court was of the view that regardless of the transactions, more particularly the private transactions, the restriction has to apply from the date the notification is issued. It was held that the petitioner's contract, which may be prior in time, has to concede or give way to the statutory notification. [*Bafna Commodities v. Union of India* – Judgement dated 15-10-2019 in S.B. Civil Writ Petition No. 15609/2019, Rajasthan High Court]

Valuation - Ship demurrage charges are not includible: Following the decision of the High Court of Orissa in the case of *Tata Steel v. Union*

of India & Ors. [W.P. (C) No. 7917 of 2009], wherein the Explanation to Rule 10(2) of the Customs Valuation (Determination of Value of Imported Goods) Rules, 2007 was struck down as ultra vires, being beyond the scope of Section 14 of the Customs Act, 1962, to the extent it includes demurrage charges in the assessable value of imported goods, CESTAT Delhi has held that ship demurrage charges are not includible in the assessable value of the imported goods. Tribunal in this regard noted the fact that the Revenue had not produced any ruling to the contrary. [*Jubilant Life Science Ltd. v. Additional Director General (Adjudication)* - Final Order No. 51288/2019, dated 3-10-2019, CESTAT Delhi]

 **News Nuggets**

DGTR introduces online filing system, ARTIS

On 30 September, the Directorate General of Trade Remedies (DGTR), the investigative Authority responsible for the conduct of trade remedial investigations in India, launched an online system - ARTIS - for filing of anti-dumping applications by domestic industry with an aim to facilitate speedy resolution of dumping issues.

ARTIS- acronym for “Applications for Remedies in Trade for Indian Industry and other Stakeholders- notified vide Trade Notice No. 03/2019 dated 30 September 2019, is intended to be a holistic digital system. As a measure for interim arrangement and for smooth transition to ARTIS, all online applications shall be followed by submission of

two copies of physical application also as per the existing practice with respect to anti-dumping applications filed up to 30th June 2020. No anti-dumping investigation (original investigation / sunset review) shall be initiated unless the application has also been filed online on ARTIS.

South Korea not to seek special treatment reserved for ‘developing country’

South Korea's Finance Ministry has on 25th of October stated that South Korea will no longer seek special treatment reserved for developing countries by the World Trade Organization in future negotiations given its enhanced global economic status. As per reports, the South Korean Finance Minister in his media briefing also stated that the decision is “not to forego

the developing country status, but is to not seek any special treatment from the negotiations going forward.” The Finance Minister also said that the government would make every effort to protect the country’s agriculture industry. It may be noted that USA

had in July 2019 named South Korea in a list of countries claiming the developing country status even though they were among the world’s richest nations. South Korea has mainly used this self-declared status to protect its agricultural sector.

NEW DELHI

5 Link Road, Jangpura Extension,
Opp. Jangpura Metro Station,
New Delhi 110014

Phone : +91-11-4129 9811

B-6/10, Safdarjung Enclave
New Delhi -110 029

Phone : +91-11-4129 9900

E-mail : lsdel@lakshmisri.com

MUMBAI

2nd floor, B&C Wing,
Cnergy IT Park, Appa Saheb Marathe Marg,
(Near Century Bazar)Prabhadevi,
Mumbai - 400025

Phone : +91-22-24392500

E-mail : lsbom@lakshmisri.com

CHENNAI

2, Wallace Garden, 2nd Street
Chennai - 600 006

Phone : +91-44-2833 4700

E-mail : lsmds@lakshmisri.com

BENGALURU

4th floor, World Trade Center
Brigade Gateway Campus
26/1, Dr. Rajkumar Road,
Malleswaram West, Bangalore-560 055.

Ph: +91(80) 49331800

Fax:+91(80) 49331899

E-mail : lsblr@lakshmisri.com

HYDERABAD

'Hastigiri', 5-9-163, Chapel Road
Opp. Methodist Church,
Nampally

Hyderabad - 500 001

Phone : +91-40-2323 4924

E-mail : lshyd@lakshmisri.com

AHMEDABAD

B-334, SAKAR-VII,
Nehru Bridge Corner, Ashram Road,
Ahmedabad - 380 009

Phone : +91-79-4001 4500

E-mail : lsahd@lakshmisri.com

PUNE

607-609, Nucleus, 1 Church Road,
Camp, Pune-411 001.

Phone : +91-20-6680 1900

E-mail : ls pune@lakshmisri.com

KOLKATA

2nd Floor, Kanak Building
41, Chowringhee Road,
Kolkatta-700071

Phone : +91-33-4005 5570

E-mail : lskolkata@lakshmisri.com

CHANDIGARH

1st Floor, SCO No. 59,
Sector 26,

Chandigarh -160026

Phone : +91-172-4921700

E-mail : lschd@lakshmisri.com

GURGAON

OS2 & OS3, 5th floor,
Corporate Office Tower,
Ambience Island,

Sector 25-A,
Gurgaon-122001

phone: +91-0124 - 477 1300

Email: ls gurgaon@lakshmisri.com

ALLAHABAD

3/1A/3, (opposite Auto Sales),
Colvin Road, (Lohia Marg),
Allahabad -211001 (U.R)

phone . +91-0532 - 2421037, 2420359

Email: lsallahabad@lakshmisri.com

Disclaimer: *International Trade Amicus* is meant for informational purpose only and does not purport to be advice or opinion, legal or otherwise, whatsoever. The information provided is not intended to create an attorney-client relationship and not for advertising or soliciting. Lakshmikumaran & Sridharan does not intend to advertise its services or solicit work through this newsletter. Lakshmikumaran & Sridharan or its associates are not responsible for any error or omission in this newsletter or for any action taken based on its contents. The views expressed in the article(s) in this newsletter are personal views of the author(s). Unsolicited mails or information sent to Lakshmikumaran & Sridharan will not be treated as confidential and do not create attorney-client relationship with Lakshmikumaran & Sridharan. This issue covers news and developments till 25th of October 2019. To unsubscribe, e-mail Knowledge Management Team at newsletter.itrade@lakshmisri.com

www.lakshmisri.com

www.gst.lakshmisri.com

www.addb.lakshmisri.com

www.lakshmisri.cn