

ที่ พณ ๐๓๐๙.๐๙/๐๒๕๕



ถึง สภาอุตสาหกรรมแห่งประเทศไทย

กรมการค้าต่างประเทศ ขอแจ้งสำเนาหนังสือของคณะกรรมการสิทธิการศุลกากรสาธารณรัฐอิสลาม ปากีสถาน (National Tariff Commission: NTC) ลงวันที่ ๑๖ พฤศจิกายน ๒๕๖๖ เรื่อง การเปิดทบทวนความ จำเป็นในการต่ออายุการใช้มาตรการตอบโต้การทุ่มตลาด (Anti - Dumping: AD) กับสินค้า Certain Uncoated Writing/Printing Paper ที่มีแหล่งกำเนิดจากสหพันธ์สาธารณรัฐบราซิล สาธารณรัฐประชาชนจีน สาธารณรัฐ อินโดนีเซีย ประเทศญี่ปุ่น และประเทศไทย ในกรณีนี้ ผู้มีส่วนได้เสียที่ต้องการเข้าร่วมกระบวนการทบทวน เพื่อพิสูจน์ข้อเท็จจริงสามารถศึกษารายละเอียดเพิ่มเติมได้จากประกาศเปิดการทบทวนฯ ตาม QR Code ที่แนบ มาเพื่อทราบและแจ้งสมาชิกที่เกี่ยวข้องให้ทราบโดยทั่วกัน



กองปกป้องและตอบโต้ทางการค้า

โทร ๐๒ ๕๔๗ ๔๗๓๘

โทรสาร ๐๒ ๕๔๗ ๔๗๔๑

รับเอกสารแล้ว	
ชื่อผู้รับ	กม. (นทีกรร)
วันที่	๖ ต.ค. ๒๕๖๖/10.๐๐น.
โทรศัพท์



www.ntc.gov.pk

S.S.R. No.42 /2016/NTC/CUWP/SR-I/2023

Government of Pakistan
National Tariff Commission

Subject: Sunset Review of Anti-Dumping Duties Imposed on Dumped Imports of Certain Uncoated Writing/Printing Paper ("Certain Paper") Originating in and/or Exported from the Federative Republic of Brazil, People's Republic of China, the Republic of Indonesia, State of Japan and Kingdom of Thailand.

National Tariff Commission (the "Commission") Government of the Islamic Republic of Pakistan presents its compliments to the esteemed Embassy of the Kingdom of Thailand in Islamabad and has the honour to invite its attention to this Commission's earlier note verbal even no. dated November 03, 2023, on the subject noted above.

2. In pursuance of Article 6.1.1 of the Agreement on the Implementation of Article VI of GATT 1994, and in accordance with Section 35 of the Anti-Dumping Duties Act, 2015 (the "Act"), and Rule 9 of the Anti-Dumping Duties Rules 2022, the Commission is soliciting/acquiring information for the purpose of these reviews, a copy of the Exporter's/producer Questionnaire for the purposes of gathering information necessary for these reviews, is enclosed.
3. In accordance with Article 6.1.3 of the Agreement on Implementation of Article VI of GATT 1994 and Section 28 of the Act, a copy of the full text of the written application (non-confidential) received from Pakistan's domestic industry is also attached. These documents will also be sent directly to the exporters/producers whose complete addresses are available with the Commission. It is, requested to kindly forward these documents to all known exporters/producers of Certain Paper in the Kingdom of Thailand, as the addresses of all exporters/producers are not available with the Commission.
4. The Commission has established and maintained a public file in which non-confidential copies of the application, public notices and communications, etc. have been placed. The public file is available to the authorized representatives of the interested parties for review and copying, from Monday to Thursday from 11:00 am to 13:00 pm.
5. If you have any questions on this matter, please feel free to contact:
Mr. Farrukh Mukhtar,
Director (Investigation),
National Tariff Commission
State Life Building No. 5, Jinnah Avenue, Islamabad.
Phone No.+92-51-9212521,
E-mail: farrukh@ntc.gov.pk, farrukhmukhtar@hotmail.com
6. The National Tariff Commission, Government of the Islamic Republic of Pakistan avails itself of this opportunity to renew to the esteemed Embassy of the Kingdom of Thailand the assurances of its highest consideration.

His Excellency, the Ambassador,
Embassy of the Kingdom of Thailand,
Plots No.1 – 20, Diplomatic Enclave-1, Sector G-5/4,
Islamabad, Pakista

Islamabad, November 16, 2023



www.ntc.gov.pk

S.S.R. No.42 /2016/NTC/CUWP/SR-I/2023-2106

National Tariff Commission
Government of Pakistan
Address: SLIC Building No. 5,
Blue Area, Islamabad
Tel: 0092 51 9212521
Fax: 0092 51 9221205

Islamabad, November 16, 2023

Subject: Sunset Review of Anti-Dumping Duties Imposed on Dumped Imports of Certain Uncoated Writing/Printing Paper ("Certain Paper") Originating in and/or Exported from the Federative Republic of Brazil, People's Republic of China, the Republic of Indonesia, State of Japan and Kingdom of Thailand.

Dear Sir,

Kindly refer to the National Tariff Commission (the "Commission") letter of even no. dated November 03, 2023, on the subject noted above.

2. In pursuance of Article 6.1.1 of the Agreement on Implementation of Article VI of GATT 1994 ("Antidumping Agreement") and in accordance with Section 35 of the Anti-Dumping Duties Act, 2015 (the "Act") and Rule 9 of the Anti-Dumping Duties Rules, 2022, the Commission is soliciting/acquiring information for the purpose of the subject review. Further, in terms of Article 6.1.3 of the Agreement on Antidumping and Section 28 of the Act, the Commission is required to provide to copy of the full text of the application (non-confidential), received from Pakistan's domestic industry to the interested parties under Section 58 of the Act.

3. In this connection, a copy of the Exporter's/producer Questionnaire, and a copy of the full text of the written application (non-confidential) are enclosed herewith for onward transmission to the esteemed Embassy of the Kingdom of Thailand in Islamabad.

4. It may please be noted that review/investigation is carried out within the specified timeline as envisaged under the Act. It is, therefore, requested that these documents may kindly be forwarded at the earliest to the esteemed Embassy of the Kingdom of Thailand in Islamabad and a copy of the forwarding letter may be sent to the Commission.

Dr. Farrukh Mukhtar DA

Farrukh Mukhtar

(Farrukh Mukhtar)
Director

Mr. Aizaz Khan,
Director General (EAP)
Ministry of Foreign Affairs
Government of Pakistan.

(Tick the appropriate box)

CONFIDENTIAL VERSION

NON-CONFIDENTIAL VERSION



**Government of Pakistan
National Tariff Commission**

Exporters /foreign producers' questionnaire for Sunset Review of Anti-Dumping Duties Imposed on Dumped Imports of Certain Uncoated Writing /Printing Paper into Pakistan Originating in and/or Exported from the Federative Republic of Brazil, People's Republic of China, the Republic of Indonesia, State of Japan and Kingdom of Thailand.

Product under Review:

The product under review is Certain Uncoated Writing and Printing Paper of weight not less than 50g /m² and not more than 130g /m², containing 100 percent by weight of fibers made from wood ("Certain Paper") (the "Product under review"). The product under review is classified under Pakistan Customs Tariff ("PCT") Nos. 4802.5510, 4802.5600, 4802.5700, 4802.6100 and 4802.6200. The product under review is mainly used for writing, printing, photocopying, and other graphic purposes and sold in reels and sheets in different sizes like A4 size etc.

Exporting Countries:

Federative Republic of Brazil, People's Republic of China, the Republic of Indonesia, State of Japan and Kingdom of Thailand

Period of Review:

July 01, 2020, to June 30, 2023.

Officer in charge:

Name : Farrukh Mukhtar
Designation : Director
Telephone : +92-51-9212521
Fax : +92-51-9221205
E-mail : mukhtar.farrukh@gmail.com,
farrukhmukhtar@hotmail.com

Address: State Life Building No. 5, Blue Area, Islamabad, Pakistan

Phone No: 092-51-9202839, Fax No: 092-51-9221205

E-mail address: ntc@ntc.gov.pk

Visit us at: www.ntc.gov.pk

PLEASE NOTE THAT THIS QUESTIONNAIRE HAS TO BE COMPLETED IN CONFIDENTIAL AND NON-CONFIDENTIAL VERSIONS AND SUBMIT TO THE COMMISSION BOTH IN THE HARD AND IN SOFT COPIES.

General Instructions

This questionnaire has been designed to enable the Commission to obtain information necessary for the Sunset Review (herein-after referred to as the "Review").

It is in the interest of exporters/foreign producers to reply as accurately and completely as possible and to attach all supporting documents as requested. If the required information is not communicated to the Commission within the time limit specified, the Commission may make its determination on the basis of information available in accordance with the section 32 of the Anti-dumping Duties Act 2015 (herein after referred as to the "Act"). Such action may be averse to the interests of parties who do not cooperate with the Commission in providing information requested in this questionnaire and any subsequent requests for information or clarification. If you are unable to answer any questions fully due to lack of data/information and in the format requested, please describe the efforts you have made to obtain the data and why you have not been able to do so. You should immediately communicate with the Officer in Charge if you have particular difficulties. Communications with the Officer in Charge and with the Commission in general may be oral initially, but only explanations and suggestions submitted in written form will become part of the official record on which determinations will be made. The Commission is willing to consider alternate methods of reporting if they provide the Commission with adequate information in time to permit the timely completion of the Review and do not deprive other parties of their rights of participation.

Two versions of this questionnaire has to be furnished; confidential version and non-confidential version. Non-confidential version would be placed in **Public File** established and maintained by the Commission in accordance with Rule 7 of Anti-Dumping Duties Rules 2022. Public file shall be opened for inspection and copying throughout the Review by the parties registered as 'interested parties' in the investigation. If you believe any information is confidential, you also must explain why it should be treated as confidential, unless the information is confidential by nature i.e. prices of individual transactions, identity of your customers or suppliers, detailed internal cost information, etc. You must provide a non-confidential summary of the confidential information. If there is any information that you wish to be treated as confidential but for which a non-confidential summary is not feasible, in that case you must explain why the information is not susceptible to summary. Failure to supply a non-confidential summary of confidential information or to justify why summarization is not possible may lead the Commission to disregard the said information and use information otherwise available in making its determination, which may lead to a result which is less favorable than if the party did cooperate.

Answers to the questions must follow the respective format given in the questionnaire. Please repeat the question in your response. All worksheets and documents compiled to answer the questionnaire, in particular those linking the information supplied with management records and audited or unaudited accounts, must be retained for inspection. Also, note that you may be asked to provide worksheets to illustrate your calculation methodology for portions of your response.

The pages of the answers to the questionnaire should be sequentially numbered. Appendices should have their own numbering system, which includes the number of the appendix, and page number, (e.g., 3-1, 3-2. etc.) If any of your answers to the question require an attachment, for example, a copy of an agreement, the attachment should identify the question to which it responds, and the page number. ~~This will allow the Commission staff to readily relate the attachments to the response and refer them in their analysis.~~

Your response to this questionnaire should be in English language. Any source material that you provide with your response must be accompanied by a translation in English so as to allow its understanding. Failure to do so may preclude the Commission from considering the information.

If you have any queries regarding questionnaire you should contact the identified Officer in Charge on the cover of this questionnaire.

GUIDELINES FOR COMPLETING NON-CONFIDENTIAL VERSION OF THE QUESTIONNAIRE

When completing the questionnaire destined for inspection by interested parties (non-confidential version of the questionnaire) you should bear in mind that all the parties registered as interested parties in this investigation will have access to it. The reply destined for inspection by interested parties should be sufficiently detailed to permit a reasonable understanding of the substance of the information submitted as 'confidential'. When completing the questionnaire destined for inspection by interested parties the Commission advise you to act as follows:

Use the completed 'confidential version' of questionnaire response as a basis. Identify all information in the 'confidential' response, which you consider is not confidential, and copy it to the file destined for inspection by interested parties.

After this, check again whether the information you did not copy to the response destined for inspection by interested parties is really confidential. If you still consider it to be confidential, you must give the reasons why, item by item and summarize the confidential information in a form destined for inspection by interested parties. If, in exceptional circumstances, it is not possible to even summarize confidential information, give reasons why summarization is not possible.

Examples on how to summarize confidential information.

- **When the information concerns numbers for various years you can use indices.**

Example of confidential information:

2017	2018	2019
20.000 Rupees	30.000 Rupees	40.000 Rupees

The summary destined for inspection by interested parties could be as follows:

2017	2018	2019
=100	150	200

- **When the information concerns a single number, you can apply a % change to it.**

Example of confidential figure:

"My cost of production is Rs. 300 per tonne."

The summary destined for inspection by interested parties could be as follows:

"My cost of production is Rs. 330 per tonne" (+ footnote saying: "actual numbers have been amended by a margin of maximum +/- 10%, to protect confidentiality").

- **When the confidential information concerns text, you can either summarise it or eliminate the names of parties by indicating their function.**

Example of confidential information:

"TRADING COMPANY Ltd, told me that the prices of imports were 20% lower."

The summary destined for inspection by interested parties could be as follows:

"[One of my customers], told me that the prices of imports were 20% lower.

SECTION A – GENERAL INFORMATION

A IDENTIFICATION

A-1 Identify your company

Name:
Address:
Telephone No:
Fax No:
E-mail Address:

A-2 Identify the authorized contact person for your company for this review

Name:
Designation:
Address:
Telephone No:
Fax No:
E-mail address:

A-3 Legal Representative

If you have appointed a legal representative to assist you in this review, please provide following details:

Name:
Address:
Telephone No:
Fax No:
E-mail address:

A-4 Corporate Information

A-4.1 Legal form of your company

A-4.2 Please indicate address (es) of all your offices involved in the administration, sales and production of the product under review.

A-4.3 Supply detailed diagram outlining the overall internal hierarchical and organizational structure of your company.

A-4.4 Please provide your company's corporate structure and affiliations, including parent companies, subsidiaries or other related companies within the country and abroad.

A-4.5 Describe the nature of your relationship with related company (s). State whether you share any board members or senior executives with any of those entities. If so identify the persons and nature of their affiliations.

~~A-4.6 Specify in detail any financial or contractual links and joint ventures with any other company concerning production, sales, licensing, technical and patent agreements for the product under review.~~

SECTION B – PRODUCT SPECIFICATION

B-1 The product under review is Certain Uncoated Writing and Printing Paper of weight not less than 50g /m² and not more than 130g/m², containing 100 percent by weight of fibers made from wood (“Certain Paper”) (the “Product under review”). The investigated product is classified under Pakistan Customs Tariff (“PCT”) Nos. 4802.5510, 4802.5600, 4802.5700, 4802.6100 and 4802.6200. The product under review is mainly used for writing, printing, photocopying, and other graphic purposes and sold in reels and sheets in different sizes like A4 size etc.

B-2 Specifications of the Product under Review

The following information is necessary to define and distinguish the different types of the product under review produced and/or sold by your company and related companies.

B-2.1 Explain in detail the types of the product under review produced and/or sold by your company and your related companies. Also, provide different characteristics and final uses of the product under review.

B-2.2 Explain in detail all differences between the product under review sold by your company and your related companies on the domestic market and those exported to Pakistan. Points to be covered should include material, design, specifications and production processes. Explain any other factors that lead to a pricing differential between the types.

B-2.3 Describe in detail your company's product coding system. Provide a key to your production and sales codes, including all prefixes, suffixes, or other notations, that identify special specifications.

B-2.4 Provide a complete set of catalogues and brochures issued by your company and/or your related companies covering all types of the product under review.

SECTION-C: OPERATING STATISTICS AND TRADE RELATED INFORMATION

C-1 Provide information on installed production capacity, quantity produced, quantity sold and inventories of the product under review in the following table.

(Unit of measurement MT)

	Oct. 2014- Sep. 2015	July 2020- June 2021	July 2021- June 2022	July 2022- June 2023
Installed production capacity of product under review				
Quantity produced of the product under review				
Opening inventory of the product under review				
Domestic sales of the product under review				
Export sales of the product under review				
Internal transfers of the product under review				
Closing inventory of the product under review				

C-2 Total quantity and value of sales

C-2.1 Please fill in the table below (total quantities and net values¹ of your sales to **unrelated customers**) for sales of the product under review during each of the following periods.

(Volume in MT and Value in US\$)

Year*	Oct. 2014- Sep. 2015		July 2020- June 2021		July 2021- June 2022		July 2022- June 2023	
	Volume	Value	Volume	Value	Volume	Value	Volume	Value
Pakistan								
Country-A								
Country-B								
Country-C								
Country-D								
:								
:								
Other Countries								
B. Domestic Sales								

C-2.2 Please fill in the table below (total quantities and net values² of your sales to **related customers**) for sales of the product under review during each of the following periods.

(Volume in MT and Value in US\$)

Year*	Oct. 2014- Sep. 2015		July 2020- June 2021		July 2021- June 2022		July 2022- June 2023	
	Volume	Value	Volume	Value	Volume	Value	Volume	Value
Pakistan								
Country-A								
Country-B								
Country-C								
Country-D								
Other Countries								
B. Domestic Sales								

C-3. Are your firm's exports of the product under review subject to anti-dumping/countervailing or other measures in any country other than Pakistan?

No Yes

If yes, list the products(s), country(ies), the year of Imposition of measure, nature and rate of measures.

¹ The value of sales be reported at ex-factory/ex-works level and after deduction of all sales discounts and free of taxes. All values should be shown in your domestic currency as reported in the audited accounts.

² The value of sales be reported at ex-factory/ex-works level and after deduction of all sales discounts and free of taxes. All values should be shown in your domestic currency as reported in the audited accounts.

Product	Country	Year imposed	Nature of measure (if tariff, give rate)
_____	_____	_____	_____
_____	_____	_____	_____

C-4. Are your firm's exports of the product under review, subject to current Investigation in any country other than Pakistan that might result in tariff or non-tariff barriers to trade?

No Yes

If yes, list the products(s), country(ies), and type of investigation.

Product	Country	Type of investigation
_____	_____	_____
_____	_____	_____

C-5. Identify export markets (other than Pakistan) that you have developed or where you have increased your sales of the product under review, as a result of the antidumping duty imposed by Pakistan. Please identify and discuss below.

C-6. Describe the significance of the existing antidumping duty in terms of its effect on your firm's production capacity, production, home market sales, exports to Pakistan and other markets, and inventories. Please compare your firm's operations before and after the imposition of the duty.

C-7. Does your firm anticipate any changes in its production capacity, production, home market sales, exports to Pakistan and other markets, or inventories relating to the production of the product under review in the future if the antidumping duty on the product from Pakistan is revoked?

No Yes

If yes, supply details as to the time, nature, and significance of such changes and provide underlying assumptions, along with relevant portions of business plans or other supporting documentation, for any trends or projections you may provide.

SECTION-D: DETAILS OF DOMESTIC SALES OF THE PRODUCT UNDER REVIEW

In this section please provide specific information on all of your sales of the product under review in your domestic market during the last year of POR (i.e., July 2022 to June 2023).

D-1 General Information

D-1.1 Explain your company's channels of distribution on your domestic market starting from the factory gate up to the first resale to unrelated customers. Include a detailed flow chart indicating terms of sale and pricing policies for each class of customer (e.g.

end-users, distributors, etc.) including related companies.

- D-1.2 Describe each step in the sales negotiation process, from the first point of contact with customer through any after-sale price adjustments. If the sales process differs between classes of customers, please describe each variation separately.
- D-1.3 For all sales through related companies, give a detailed description of how sales are made indicating the procedure followed between time of order and delivery to the first unrelated customer. A full explanation of how the invoicing and payment are made should be given.
- D-1.4 If your sales are made pursuant to contracts (either long-term or short-term), describe in detail the process by which the contracts, and the prices and quantities therein, are agreed upon. Describe each of the types of contracts applicable to the POR, including the terms, the requirements for a price change or re-negotiation by either side, etc. Explain any commitments on either party, should the contract be terminated prematurely.
- D-1.5 Explain whether production begins after the customer has ordered the product and the sale has been made, or pursuant to normal company production schedules.
- D-1.6 Provide copies of all price lists (in English or accompanied by English translations) issued or in use during the POR for sales made on your domestic market, including those used by related companies.
- D-1.7 List any cost incurred by your related companies that have been paid or reimbursed by your company, directly or indirectly, regardless of whether the cost was related to the product subject to anti-dumping duty. Explain in detail the nature of these costs.

D-2 Allowances on Domestic Sales

In order to carry out a fair comparison between the **export price** and the **normal value** of the product under review, the following information is requested. Where the normal value and the export price as established are not on a comparable basis, due allowance, in the form of adjustments, should be made where prices and price comparability are affected. For this purpose, you should claim adjustments where it can be demonstrated that the factor concerned is one that has resulted in a different price being charged to your customers. You are requested to explain in detail all adjustments that could affect price comparisons, to report them on a transaction-by-transaction basis at point D-3. Report actual expenses rather than averages. If you allocate any of these expenses, explain the reason for your choice and the methodology used:

D-2.1 DIFFERENCES IN PHYSICAL CHARACTERISTICS

In comparing the product sold to Pakistan with the most similar domestic market product, an adjustment can be made to take account of physical differences between both the products.

The amount of the adjustment shall correspond to a reasonable estimate of the difference in market value between the comparable type sold on the domestic market and the type exported to Pakistan if it was sold on the domestic market. Identify the

physical differences separately for each type. Provide a detailed list of all physical differences with a full explanation of each item listed. For each difference claimed provide detailed information of the market value of such difference. Identify the source of your data. Report the amount of such difference in the transaction-by-transaction listing at point D-3 below).

D-2.2 IMPORT CHARGES OR INDIRECT TAXES

An adjustment concerning import charges (on inputs) and indirect taxes can be made. For such adjustments provide the following information:

List all indirect taxes imposed on sales of product under review in your domestic market which were either fully or partially exempted upon exportation or not collected on the products exported to Pakistan.

For each tax listed above, provide English translations of statutes and regulations authorizing the collection of the tax, including documents which explain the method of calculation, assessment, and payment of the tax.

For each tax listed above, separately provide information on the tax base or taxable price, the tax rate, the amount of taxes assessed, any deductions or offsets to the tax and the formula used to calculate the tax amount.

Indicate when you have a legal obligation or liability to pay tax. Report when you actually paid taxes and whether you maintain separate accounts for these taxes.

Report in the transaction-by-transaction (see D-3 below) the amount of such taxes applicable to each domestic sale.

D-2.3 DIFFERENCES IN DISCOUNTS, REBATES, AND QUANTITIES

Describe in detail your policy for granting discounts and rebates to your domestic customers. List all different kinds of discounts or rebates you granted, e.g., cash discounts, quantity discounts, loyalty discounts, year-end rebates, etc., and describe their terms. Include deferred discounts. If discounts or rebates vary by class of customer, explain separately the discounts and rebates given to each class. Note that the term "rebate" includes credit on current or future purchases, promissory notes, extension of credit, or free goods or services.

List all of your customers who were eligible for each discount or rebate program, and describe the criteria you used to determine their eligibility.

Provide your discount schedules, and be prepared to furnish on request contracts or agreements that reflect all discounts and rebates that were given.

Report the adjustment in the transaction-by-transaction listing at point D-3 below.

D-2.4 DIFFERENCES IN THE LEVEL OF TRADE

An adjustment for differences in levels of trade, including any differences which may arise in OEM (Original Equipment Manufacture) sales, can be made where, in relation to the distribution chain in both markets, it is shown that the export price, including a constructed export price, is at a different level of trade from the normal

value and the difference has affected price comparability which is demonstrated by consistent and distinct differences in functions and prices of the seller for the different level of trade in the domestic market of the exporting country. The amount of the adjustment has to be based on the market value of the difference.

However, in circumstances not envisaged in the paragraph above, when an existing difference in level of trade cannot be quantified because of the absence of the relevant levels on the domestic market of the exporting country, or where certain functions are shown clearly to relate to levels of trade other than the one which is to be used in the comparison, a special adjustment may be granted.

If you claim a level of trade adjustment the following information should be provided:

- a detailed description of the functions of each level of trade both on the domestic market and Pakistani market.
- a detailed description of the method used to determine the amount of adjustment.
- evidence showing that prices differ consistently for the different levels of trade on the domestic market.
- report in the transaction-by-transaction listing (at point D-3 below) the market value of the difference in level of trade.

D-2.5 DIFFERENCES IN TRANSPORTATION, INSURANCE, HANDLING, LOADING, AND ANCILLARY COSTS

List all charges that are included in domestic prices and explain how you have quantified each of these charges. Report the adjustment in the transaction-by-transaction listing at point D-3 below. Identify the general ledger account(s) where each such expense is located.

As far as transportation costs are concerned your attention is drawn to the fact that an adjustment can only be made for transportation costs that were incurred subsequent to the sale being made, for moving the products from the production premises to the customer.

D-2.6 DIFFERENCES IN PACKING COSTS

Specify the per unit cost of packing for the product under review. List material and labour costs separately. Be specific in describing packing materials.

Report the adjustment in the transaction-by-transaction listing below (see point D-3 below). Identify the general ledger account where the expense is located.

D-2.7 DIFFERENCES IN THE COST OF ANY CREDIT GRANTED FOR THE SALES

Cost of credit refers to the "costs" of granting credit for a specific sales transaction. The agreed terms of payment must be known to the parties involved and the cost of the credit terms must be reflected in the sales price of the product under review. Describe the method you have used to calculate the credit costs. Indicate the interest rate you used to compute expenses associated with granting credit on sales

Provide information on interest rates that you paid for short-term borrowings for the

currencies concerned. Explain your calculation of the credit costs reported in the transaction-by-transaction listing (see D-3 below).

D-2.8 DIFFERENCES IN THE DIRECT COSTS OF PROVIDING WARRANTIES, GUARANTEES, TECHNICAL ASSISTANCE, AND SERVICES, AS PROVIDED FOR BY LAW AND/OR IN THE SALES CONTRACT

List all costs mentioned above that were incurred and were specified in the domestic sales contracts, or were required by the law of the country concerned, e.g. the cost of the materials concerned.

Provide a record of warranty/guarantee expenses incurred for sales of the product under review during the last year of POR (i.e., July 2022 to June 2023).

State how you calculated these expenses. Identify your source of data. If these expenses were incurred only for certain customers, provide customer specific information. Explain your calculation of warranty/guarantee costs in the transaction-by-transaction listing at D-3 below.

Cost for technical services can include any service; repair, or consultation you provide to a customer regarding the product under review. An adjustment can only be made for expenses that are directly related to the sales of the product under review. If technical assistance and services are performed by a division or cost center of your firm, identify that division. Describe any technical assistance and service provided on the export market. Note any reimbursement you received for these services.

Report the adjustment in the transaction-by-transaction listing at D-3 below. Identify the general ledger account where the expense is located.

D-2.9 DIFFERENCES IN COMMISSIONS PAID IN RESPECT OF THE SALES UNDER CONSIDERATION

Where commissions were paid to agents, unrelated or related sellers, report the amount of commission expenses and explain the terms under which commissions are given. Report the adjustment in the transaction-by-transaction listing at D-3 below. Identify the general ledger account where the expense is located.

D-2.10 OTHER FACTORS

An adjustment may also be made for differences in other factors not provided above if it is demonstrated that they affect price comparability, in particular that customers consistently pay different prices on the domestic market because of the difference in such factors.

D-3 TRANSACTION-WISE INFORMATION ON DOMESTIC MARKET SALES

Following information should be provided for each sales transaction made in your domestic market during the last year of POR i.e., 1st July 2022 to 30th June 2023 in a table form. This information should also be supplied in soft form on USB or through email. These data files should be compatible to the US versions in EXCEL format.

	Information Required	Field Name
A	Sequential number for the transaction	S. No.
B	Product code (if any)	Code
C	Product description	Product
D	Date of issue of the invoice	IN. Date
E	Invoice number.	IN. No
F	Number of the bill of lading or other transport document.	LB No
G	Sales order or contract number.	SALORDNo
H	Date of the sales order or contract.	SaleDate
I	Customer name.	CUS. Name
J	Relationship with customer (show code "U" for "Unrelated customer", and code "R" for "Related customer").	CUS.REL
K	Quantity (in MT or Kgs) of the product under review, (for this transaction).	QTY
L	Gross value of this transaction in the currency of sale.	G.Value
M	Currency of sale	Currency
N	Number of the credit note (if any).	Crdt N.No
O	Date of the credit note issued.	Crdt Date
P	Quantity (in units) credited.	Crdt Qty
Q	Value credited.	Crdt Value
R	Net quantity (in units) (quantity of the invoice minus quantity of the credit note)	Net Qty
S	Payment terms (e.g. at sight, 30 days credit, etc.)	P.Terms
T	Interest rate (if sales is made on credit)	Int Rate
U	Credit Cost	Crdt Cost
V	Delivery terms	Del Terms
W	The actual amount of discounts which were not deducted on the invoice.	Discount
X	The actual amount of the rebate.	Rebate
Y	The amount of commission paid (if any).	Commission
Z	Adjustment for physical difference	Physical
AA	Amount of indirect taxes	Ind Tax
AB	The amount of freight in domestic market.	Freight
AC	The amount of insurance cost.	Insurance
AD	The amount of Handling, loading and ancillary expenses.	Handl Cost
AE	The bank charges related to this transaction, e.g. document fee, bank commission, currency exchange, etc..	Bank Char
AF	The amount of warranty and guarantee expenses (if any).	Warnty
AG	The amount of the expenses for technical assistance and services.	Tech Asst
AH	In case you claim any other non-specified allowance (please specify).	Other
AI	Net Value of this transaction (gross value-adjustments)	Net Value
AJ	Per unit total cost to make and sell (cost of production plus administrative, selling, financial expenses and other) for this transaction	COS

SECTION-E: DETAILS OF EXPORT SALES OF THE PRODUCT UNDER REVIEW TO PAKISTAN

In this section please provide specific information on all of your sales transactions of the product under review for exports to Pakistan during the last year of POR i.e., 1st July 2022 to 30th June 2023.

E-1 General Information

- E-1.1 Explain your company's channels of distribution to Pakistan starting from the factory gate up to the first resale to unrelated customers. Include a detailed flow chart indicating terms of sale and pricing policies to each class of customer (e.g., end-users, distributors, etc.) including related companies.
- E-1.2 Describe each step in the sales negotiation process, from the first point of contact with customer through any after-sale price adjustments. If the sales process differs between classes of customers, please describe each variation separately.
- E-1.3 Where export sales to Pakistan were made through intermediate countries, please provide the following information:
- a) Explain each distribution channel through which the product under review enters the Pakistan. Report the names of the companies involved and whether they are related to your company. Provide information on who holds legal title of the product under review while it is in intermediate countries. List the qualities of product under review and the countries from which they are shipped to Pakistan. Include a flow chart indicating the physical delivery, ordering, invoicing and payment of the sales concerned.
 - b) If there is any further processing or assembly, or if the product under review is changed or enhanced in any way in intermediate country, explain in detail.
- E-1.4 For all sales through related companies, give a detailed description of how sales are made indicating the procedure followed between time of order and delivery to the first unrelated customer. A full explanation of how the invoicing and payment is made should be given.
- E-1.5 If your sales are made pursuant to contracts (either long-term or short-term), describe in detail the process by which the contracts, and the prices and quantities therein, are agreed upon. Describe each of the types of contracts applicable to the product under review, including the terms, the requirements for a price change or re-negotiation by either side, etc. Explain any commitments on either party, should the contract be terminated prematurely.
- E-1.6 Explain whether production begins after the customer has ordered the product and the sale has been made, or pursuant to normal company production schedules.
- E-1.7 Provide copies of all price lists (in English or accompanied by English translation) issued or in use during the POR for exports to Pakistan, including those used by related companies.
- E-1.8 List any cost incurred by your related companies that have been paid or reimbursed by your company, directly or indirectly, regardless of whether the cost was related to

the product under review. Explain in detail the nature of these costs.

E-2 Allowances on Export Sales

In order to carry out a fair comparison between the **export price** and the **normal value** of the product under review, the following information is requested. Where the normal value and the export price as established are not on a comparable basis, due allowance, in form of adjustments, should be made where prices and price comparability are affected. For this purpose you should claim adjustments where it can be demonstrated that the factor concerned is one that has resulted in a different price being charged to your customers. You are requested to explain in detail all adjustments that could affect price comparisons, to report them on a transaction-by-transaction basis. Report actual expenses rather than averages. If you allocate any of these expenses, explain the reason for your choice and the methodology used:

E-2.1 DIFFERENCES IN DISCOUNTS, REBATES, AND QUANTITIES

Describe in detail your policy for granting discounts and rebates to customers in Pakistan. List all different kinds of discounts or rebates you granted, e.g., cash discounts, quantity discounts, loyalty discounts, year-end rebates, etc., and describe their terms. Include deferred discounts. If discounts or rebates vary by class of customer, explain separately the discounts and rebates given to each class. Note that the term "rebate" includes credit on current or future purchases, promissory notes, extension of credit, or free goods or services.

List all of your customers who were eligible for each discount or rebate program and describe the criteria you used to determine their eligibility.

Provide your discount schedules and be prepared to furnish on request contracts or agreements that reflect all discounts and rebates that were given.

Report the adjustment in the transaction-by-transaction listing below (see point E-3 below).

E-2.2 DIFFERENCES IN TRANSPORTATION, INSURANCE, HANDLING, LOADING, AND ANCILLARY COSTS

List all charges that are included in the export prices and explain how you have quantified each of these charges. Identify the general ledger account(s) where each such expense is located.

As far as transportation costs are concerned your attention is drawn to the fact that an adjustment can only be made for transportation costs that were incurred subsequent to the sale being made, for moving the products from the production premises to the unrelated customer. Report the adjustment in the transaction-by-transaction listing at point E-3 below).

E-2.3 DIFFERENCES IN PACKING COSTS

Specify the cost of packing for the product under review. List material and labour costs separately. Be specific in describing packing materials and any special or extraordinary procedures used in preparing the product under review for shipment to Pakistan. If the product under review is repackaged in Pakistan, report these charges and costs separately.

Report the adjustment in the transaction-by-transaction listing (see point E-3 below). Identify the general ledger account where the expense is located.

E-2.4 DIFFERENCES IN THE COST OF ANY CREDIT GRANTED FOR THE EXPORT SALES

Cost of credit refers to the "costs" of granting credit for a specific sales transaction. The agreed terms of payment must be known to the parties involved and the cost of the credit terms must be reflected in the sales price of the product under review. Describe the method you have used to calculate the credit costs. Indicate the interest rate you used to compute expenses associated with granting credit on sales.

Provide information on interest rates that you paid for short-term borrowings for the currencies concerned. Explain your calculation of the credit costs reported in the transaction-by-transaction listing (see E-3 below).

E-2.5 DIFFERENCES IN THE DIRECT COSTS OF PROVIDING WARRANTIES, GUARANTEES, TECHNICAL ASSISTANCE AND SERVICES, AS PROVIDED FOR BY LAW AND/OR IN THE SALES CONTRACT

List all costs mentioned above that were incurred and were specified in the export sales contracts, or were required by the law of the country concerned, e.g. the cost of the materials concerned.

Provide a record of warranty/guarantee expenses incurred for sales of the product under review during the POR.

State how you calculated these expenses. Identify your source of data. If these expenses were incurred only for certain customers, provide customer specific information. Explain your calculation of warranty/guarantee costs in the transaction-by-transaction listing at E-3 below.

Cost for technical services can include any service; repair, or consultation you provide to a customer regarding the product under review. An adjustment can only be made for expenses that are directly related to the sales of the product under review. If technical assistance and services are performed by a division or cost center of your firm, identify that division. Describe any technical assistance and service provided on the export market. Note any reimbursement you received for these services.

Report the adjustment in the transaction-by-transaction listing at E-3 below. Identify the general ledger account where the expense is located.

E-2.6 DIFFERENCES IN COMMISSIONS PAID IN RESPECT OF THE SALES UNDER CONSIDERATION

Where commissions were paid to agents, unrelated or related sellers, report the amount of commission expenses and explain the terms under which commissions are given. Report the adjustment in the transaction-by-transaction listing at E-3 below. Identify the general ledger account where the expense is located.

E-2.7 DUTY DRAWBACK, SUBSIDY OR REBATE

Provide original and English translations of statutes and regulations authorizing duty drawback, subsidy or rebate on exported goods and governing the methods

used to calculate duty drawback or rebate.

Report the total amounts of duty drawback you received separately for sales to Pakistan and for sales to third countries, and separately for the product under review and for other products.

Provide on a transaction-by-transaction basis, the amount of duty drawback or rebate you received for each sale to Pakistan at point E-3 below. Explain how you calculated this amount for each transaction.

Explain the method you used to connect the duty drawback amount to the specific Pakistani sale.

E-2.8 CURRENCY CONVERSIONS

In order to compare export with domestic sales prices a conversion of currency will be required. Fluctuations in exchange rates can only be taken into account under certain circumstances, i.e. when a fluctuation becomes a "sustained" movement.

If you claim an adjustment for currency conversion, provide detailed information on the movement in exchange rates in your country. Provide the official central bank exchange rates specifying the official daily buying and selling rates of exchange used for the foreign currencies concerned during the last two years in connection with the export of goods and services. Provide the unofficial exchange rates and the sources of these rates. Explain the adjustment you claim in the transaction-by-transaction listing (see E-3 below).

If you bought foreign currency in advance of the date of sale, provide the details of the forward purchase and explain whether the purchase was specifically linked to export transactions. If so, state the exchange rates of the forward purchase for the specific sale concerned in the transaction-by-transaction listing below (see E-3 below).

E-2.9 OTHER FACTORS

An adjustment may also be made for differences in other factors not provided above if it is demonstrated that they affect price comparability, in particular that customers consistently pay different prices on the domestic market because of the difference in such factors.

E-3 Information on Export Transactions

Following information should be provided for each export transaction made to Pakistan in the last year of POR i.e., 1st July 2022 to 30th June 2023 in a table form. This information should also be supplied in soft form on USB or through email. These data files should be compatible to the US versions in EXCEL format.

	Information Required	Field Name
A	Sequential number for the transaction/shipment	S. No.
B	Product code (if any)	Code
C	Product description	Product
D	Date of issue of the invoice	IN. Date
E	Invoice number.	IN. No
F	Number of the bill of lading or other transport document.	LB No
G	Sales order or contract number.	SALORDNo

H	Date of the sales order or contract.	SaleDate
I	Customer name.	CUS. Name
J	Relationship with customer (show code "U" for "Unrelated customer", and code "R" for "Related customer").	CUS.REL
K	Quantity (in MT or Kgs) of the product under review, (for this transaction).	QTY
L	Gross value of this transaction in the currency of sale.	G.Value
M	Currency of sale	Currency
N	Number of the credit note (if any).	Crdt N.No
O	Date of the credit note issued.	Crdt Date
P	Quantity (in units) credited.	Crdt Qty
Q	Value credited.	Crdt Value
R	Net quantity (in units) (quantity of the invoice minus quantity of the credit note)	Net Qty
S	Payment terms (e.g. at sight, 30 days, etc.)	P.Terms
T	CIF Value	
U	Interest rate (if sales is made on credit)	Int Rate
V	Credit Cost	Crdt Cost
W	Delivery terms (e.g. FOB, C&F, CIF, etc.).	Del Terms
X	The actual amount of discounts which were not deducted on the invoice.	Discount
Y	The actual amount of the rebate or subsidy.	Rebate
Z	The amount of commission paid (if any).	Commission
AA	The amount of inland freight in exporting country.	Inl Frt
AB	The amount of ocean freight.	Ocn Frt
AC	The amount of insurance cost.	Insurance
AD	The rate of export tax	Exp.tax Rt
AE	The amount of export tax	Exp.Tax
AF	The rate of value added tax	VAT rate
AG	The amount of value added tax	VAT
AH	Amount of duty draw back (if any)	Duty DB
AI	The amount of inland freight paid from the Pakistani port to the unrelated customer (if any).	InlPk Frt
AJ	The amount of Handling, loading and ancillary expenses.	Handl Cost
AK	The bank charges related to this transaction, e.g. document fee, bank commission, currency exchange, etc..	Bank Char
AL	The amount of warranty and guarantee expenses (if any).	Warnty
AM	The amount of the expenses for technical assistance and services.	Tech Asst
AN	In case you paid customs duties, in Pakistan indicate the amount.	Cus.Duty
AO	In case you claim any other non-specified allowance (please specify).	Other
AP	Net Value of this transaction (gross value-adjustments)	Net Value
AQ	Exchange rate used for the conversion of the currency of sale to your own accounting currency.	Exchange

SECTION-F MARKET FACTORS

F-1 To what extent have changes in the prices of raw materials affected your firm's

selling prices for the product under review? Also discuss any anticipated changes in your raw material costs in the future, identifying the time period(s) involved and the factor(s) that you believe would be responsible for such changes. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation, that address this issue.

- F-2 Have individual producers, importers, purchasers, or foreign producers/exporters of the product under review influenced the Pakistan wholesale market price of the product under consideration since year of the imposition of duty.

No Yes

Please identify any such firm(s) and note the time period when the firm(s) influenced price, whether the effect was to increase or decrease the price, and why your firm believes that the actions of the firm(s) were responsible for the price change.

- F-3 Describe how easily your firm can shift its sales of product under review between the Pakistan market and alternative country markets. In your discussion, please describe any contracts, other sales arrangements, or other constraints (including any third-country trade barriers such as tariffs, quotas, or other non-tariff barriers) that would prevent or retard your firm from shifting product under review between the Pakistan and alternative country markets. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation, that address this issue.

- F-4 Is the product range, product mix, or marketing of the product under review in your home market significantly different from the product range, product mix, or marketing of the product under review for export to Pakistan or to third-country markets? Have there been any significant changes in the product range, product mix, or marketing of the product under review in your home market, for export to the Pakistan, or for export to third-country markets since year of imposition of duty?

No Yes

Please describe and quantify if possible.

- F-5 Please discuss any anticipated changes in terms of the product range, product mix, or marketing of the product under review in your home market, for export to Pakistan, or for export to third-country markets in the future, identifying the time period(s) involved and the factor(s) that you believe would be responsible for such changes. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation, that address this issue.

- F-6 What other products may be substitutes for the product under review. Have there been any changes in the number or types of products that can be substituted for the product under review since year of the imposition of duty?

No Yes

Please explain.

- F-7 Please discuss any anticipated changes in terms of the substitutability of other

products for the product under review in the future, identifying the time period(s) involved and the factor(s) that you believe would be responsible for such changes. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation, that address this issue.

- F-8 Is the product under review produced by your firm and sold in its home market interchangeable (i.e., can be used in the same applications) with your firm's product under review sold to Pakistan and/or to third-country markets?

Yes No

Identify the market(s) and any differences in the products.

- F-9 Describe the end uses of the product under review that you manufacture and sell to your home market. If these end uses differ from those of the product under review you sell to Pakistani market or to third-country markets, explain.
- F-10 Discuss any changes in the end uses of the product under review since the year of the imposition of duty, by market and time period.
- F-11 Please discuss any anticipated changes in terms of the end uses of the product under review in the future, identifying the time period(s) involved, the market(s), and the factor(s) that you believe would be responsible for such changes. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation, that address this issue.
- F-12 How has the demand within your home market and the Pakistan (and worldwide, if known) for the product under review changed since the year of imposition of duty? What were the principal factors affecting changes in demand?
- F-13 Please discuss any anticipated changes in the product under review demand and supply in your home market and the Pakistan (and worldwide, if known) in the future, identifying the time period(s) involved and the factor(s) that you believe would be responsible for such changes. Provide any underlying assumptions, along with relevant portions of business plans or other supporting documentation, that address this issue.

SECTION G - COST OF PRODUCTION

Cost of production and raw materials/inputs information for each type of product under review should be reported in Appendix No. 1 and Appendix No. 2 for the year 2014-15 (from 1st Oct. 2014 to 30th Sep. 2015) and the POR i.e. (1st July 2020 to 30th June 2023)

The amounts reported in Appendix 1 should be based on the actual costs incurred by your company as recorded in your normal accounting system.

If you produce the product under review at more than one facility, total costs incurred at all facilities be reported in appendix 1.

Indicate your accounting period.

Please indicate the address where the accounting records concerning the activities of the

company are located. If they are maintained in different locations, please indicate which records are kept at what location.

Attach an English version of the audited accounts including Balance sheet, Profit and loss accounts and all reports, notes, footnotes and auditor's opinion to these documents for the POR for your company as well as for those companies related to you which are involved in the production, marketing or sales of the product subject to anti-dumping duty. If applicable, you should also provide copies of the consolidated financial statements for the same periods. In the event that your company's accounts have not been audited, attach the financial statements that are required by your country's business law. Provide copies of any financial statement or other financial report filed with the local or national government of the country in which your company or the related companies were located for the three most recent financial years.

If internal financial statements, management reports, standard cost reviews etc. are prepared and maintained for the product subject to anti-dumping duty, provide copies for the three most recent financial years.

Provide a chart of accounts (translated into English). This should also contain numbers and labels of accounts used for analytic purposes.

G-1 General Information Needed

The production process, financial accounting, and cost accounting information requested below is necessary for the Commission to better understand your operations, products and production processes, and financial and cost accounting practices. Please provide complete and detailed narrative responses to each of the items listed below.

G-1.1 Products and Production Process

Describe the manufacturing process for the product under review. Description should include the following:

- a) A description of your company's production facility. If production or any one process takes place at more than one facility, list all facilities informing their location, and provide brief descriptions of the production activities that take place at those major facilities.
- b) Please provide a list of all companies that are involved on a subcontracting basis in the manufacture of the product under review. Describe the part of the manufacturing process they are performing.
- c) Explain the production process of the product under review produced and sold by your firm and attach a complete flowchart of the production cycle, including descriptions of each stage in the process.
- d) All inputs used to produce the product under review.
- e) List the primary materials used in the manufacturing process and your relationship with the main suppliers (whether related or not). Indicate whether the primary materials were imported, and explain whether the value of the primary material includes import charges or indirect taxes.

- f) In case primary materials or components are used for the manufacturing of both the product under review and other products not subject to this proceeding please provide information concerning the overlapping material use.
- g) A description of how your account for processing yields or losses throughout the production cycle. Indicate each stage in the production cycle where processing yields are measured.
- h) All joint products, by-products or scrap, that result from producing the product under review and where in the production process they become individually identifiable. State whether any scrap material generated is reintroduced into the production cycle as raw materials, sold, or otherwise disposed of in the normal course of business.
- i) Identify any products manufactured by your company in the same production facilities as the product under review.
- j) Identify the major "by-products" resulting from the production of the product under review and describe the use given to these "by-products".
- k) Provide the number of days for which the product under review is held in inventory in either market (domestic and export) prior to the time of sale.
- l) Provide details of taxes and duties (e.g. Sales tax/value added tax etc.) applicable for production and sales of the product under review. Also indicate differences between taxes and duties on domestic sales and export sales of the product under review.

G-1.2 Financial Accounting Systems and Policies

Please provide a flowchart illustrating your financial accounting books and record keeping system. Indicate in your flowchart all subsidiary ledgers (e.g., subsidiary ledgers maintained for raw materials purchases, inventories, sales, accounts receivable, etc.) and reports generated by your financial accounting system, show in your flowchart how data from your financial accounting system are summarized in financial statements.

G-1.3 Cost Accounting Systems and Policies

Describe your normal cost accounting system and how it is used to classify, allocate, aggregate, and record the costs incurred to produce the product subject to anti-dumping duty in the normal course of business. It should be provided in narrative form and should include a flow chart that illustrates: (i) how the system records and reports costs for the product under review throughout the production process, and (ii) the various subsidiary cost ledgers maintained under the system and how they reconcile to your normal financial statement data. In addition, describe:

- the method used under your cost accounting system to account for scrap generated at each stage of the production process.
- the method used under your cost accounting system to account for joint products and by-products that result from producing the product under Review.
- all production costs incurred by your company which are valued differently for cost accounting purposes than for financial accounting purposes.

- how you value opening and closing inventories and materials issued for production.
- how you charge depreciation in the accounts e.g. straight line or other method
- how respective rates and amounts of interest on owners' capital and/ or loan are charged in the accounts.
- the subsidies/ rebates, export rebate available/ received and their treatment in the accounts;
- how indirect costs have been allocated to joint products and by-products e.g. market/ sales value method, quantitative/ physical unit method, average unit cost method, weighted average method etc.
- how specific items are treated differently in your financial and cost accounting systems.

G-1.4 Worksheets

Provide worksheets that illustrate:

- i. How you computed direct materials, direct labor, and fixed and variable overhead costs. If you rely on a standard cost accounting system, the worksheets for the product under review and for other products should show how you allocated any cost variances in deriving actual production costs.
- ii. How you computed general and administrative expense ratios. The worksheet should demonstrate how the G&A expenses used for Appendix 1 reconcile with your financial statements.
- iii. How you compute your net interest expense ratio? The worksheet should demonstrate how the interest income and expense figures used for Appendix 1 interest reconcile with your financial statements.

G-2 Purchase of Raw Materials

Please provide a complete list of your purchases of raw materials or components used for the production of the product under review, during the year 2022-23 (from 1st July 2022 to 30th June 2023). This list should at least contain references to the country of origin, date of purchase, weight/units, price, delivery terms, import duties paid, and should also allow a direct link to the original purchasing documents. Further, information on purchases and usage of inputs/raw materials should be provided in Appendix-3

If you claim a duty drawback adjustment based on the raw materials or components purchases list, please summarize your purchases during the POR and import duties paid, by filling in the following tables:

a) Materials and components purchased locally

Type/ Description of the input	Quantity	Value	Amount of duty/ tax normally payable	Amount of duty/tax paid	Quantity required to produce one unit of product under review
(Please specify)					
:					
:					
Totals					

b) Materials and components imported

Type/ Description of the input	Quantity	Value	Amount of duty/ tax normally payable	Amount of duty/tax paid	Quantity required to produce one unit of product under review
(Please specify)					
Totals					

SECTION H - EXCHANGE RATE

Please provide information on exchange rate in the following table
Exchange rates per one unit currency of exporting country

Period	US Dollar
2014	
2015	
2016	
2017	
2018	
2019	
2020	
2021	
2022	
2023	

CHECK LIST

The purpose of the following checklist is to ensure that you have answered all questions of the above Sections and to permit a quick survey on information, which may be missing. You are requested to tick the box where complete information is submitted or where information has not sufficiently been provided:

SECTION	PLEASE TICK IF YOU SUBMITTED ALL INFORMATION REQUESTED ✓	PLEASE TICK IF INFORMATION IS NOT OR INSUFFICIENTLY SUBMITTED ✓
GENERAL INFORMATION	<input type="checkbox"/>	<input type="checkbox"/>
PRODUCT SPECIFICATION	<input type="checkbox"/>	<input type="checkbox"/>
OPERATING STATISTICS AND TRADE RELATED INFORMATION	<input type="checkbox"/>	<input type="checkbox"/>
DOMESTIC SALES OF THE PRODUCT UNDER REVIEW	<input type="checkbox"/>	<input type="checkbox"/>
EXPORT SALES OF THE PRODUCT UNDER REVIEW TO PAKISTAN	<input type="checkbox"/>	<input type="checkbox"/>
MARKET FACTORS	<input type="checkbox"/>	<input type="checkbox"/>
COST OF PRODUCTION	<input type="checkbox"/>	<input type="checkbox"/>
EXCHANGE RATE	<input type="checkbox"/>	<input type="checkbox"/>
COST TO MAKE AND SELL OF THE PRODUCT UNDER REVIEW (APPENDIX 1)	<input type="checkbox"/>	<input type="checkbox"/>
COST OF RAW MATERIAL AND PACKAGING MATERIAL OF THE PRODUCT UNDER REVIEW (APPENDIX 2)	<input type="checkbox"/>	<input type="checkbox"/>

CERTIFICATION

It is certified that all information herein supplied in response to the questionnaire is complete and correct to the best of my knowledge and belief and understand that the information submitted may be subject to verification by the Pakistan National Tariff Commission.

Date

Signature of an authorized official

Name and designation of an authorized official

COST TO MAKE AND SELL OF THE PRODUCT UNDER REVIEW

Product Name with Grade/ Type/ Model: _____

Please provide information separately for the year 2014-15 (Oct. 2014 to Sep. 2015) and each year of POR (i.e., July 2020-June 2021, July 2021-June 2022 and July 2022-June 2023). Mention period to which the information pertains (e.g. 2022-23)

(Unit of measurement)
(Unit of Currency)

S.No.		Domestic Sales		Export Sales		Total Sales	
		Quantity (Units)	Value (currency)	Quantity (Units)	Value (currency)	Quantity (Units)	Value (currency)
1	1.1	Sales to un-related customers					
	1.2	Sales to related customers (other than subsidiary companies)					
	1.3	Sales to subsidiary companies					
	1.4	Internal transfer (please describe basis for valuation)					
	1.5	Total Sales					
2	COST OF GOODS SOLD						
2.1	Quantity produced (specify unit of measurement)						
			Variable Cost		Fixed Cost		Total Cost
2.2	i.	Raw and packing material					
		- local					
	ii.	Raw and packing material					
		- imported					
	iii.	Salaries and wages					
	iv.	Overheads details					

	- Stores, spares/supplies			
	- Electricity			
	- Gas/fuel			
	- Repair and maintenance			
	- Depreciation			
	- Miscellaneous/other expenses			
2.3	Total Cost of Production			
2.4	Plus opening stock			
2.5	Available for sale (2.3+2.4)			
2.6	Less closing stock			
2.7	Cost of goods sold (2.5-2.6)			
3.	Gross profit on sales (1.5-2.7)			
4.	Selling, administrative and financial expenses			
	4.1 Selling expenses			
	4.2 Administrative expenses			
	4.3 Financial expenses			
5	Other/bi-product's income			
6.	Cost to make and sell (2.7+4-5)			
7.	Net Profit on sales (1.5-5)			

Note:

All items of income & expenditure should be reconcilable with Annual Audited Accounts. In case more than one products are produced and sold, a statement showing the results for the product under review and all other products be prepared to reconcile the results with audited accounts.



Royal Thai Embassy Islamabad
No. 801.....
Received on 22/11/23

Bulleh Shah Packaging (Private) Limited

Updated Version for Revised POR (Jul 2020 – Jun 2023)

Sunset Review Application under Section 58 of the Antidumping Duties ACT, 2015 concerning continuation of Antidumping Duties levied in ADC No. 42/2016/NTC/CUWP on Dumped Imports Of "Certain Uncoated Writing / Printing Paper" into Pakistan Originating in and/or Exported from Federative Republic of Brazil, People's Republic of China, Republic of Indonesia, State of Japan and Kingdom of Thailand

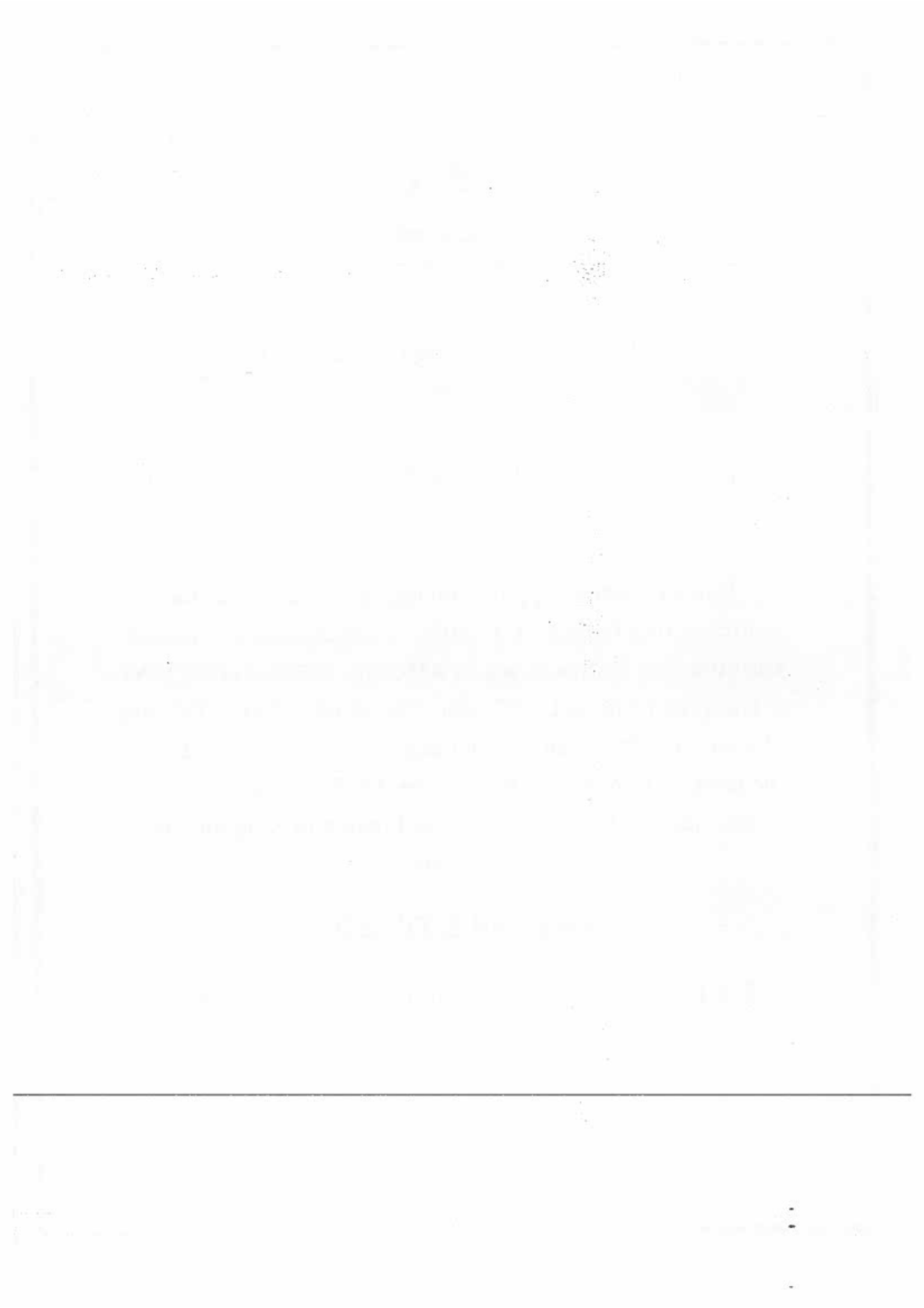
Prepared & Filed By:

S.U.Khan Associates Corporate & Legal Consultants

Submitted To:

National Tariff Commission (NTC)

PAGE NO



SUNSET REVIEW APPLICATION

This application is being filed on behalf of the domestic industry producing manufacturing Certain Uncoated Writing and Printing Paper of weight not less than 50 g/m² and not more than 130 g/m², containing 100 percent by weight of fibers, made from wood ("Certain Paper" or "domestic like product") for initiation of a Sunset Review Investigation for continuation of definitive anti-dumping duties for another period of 5 years, under Section 58 of the Act, on dumped imports of Certain Paper (product subject to anti-dumping duty) falling under PCT Codes 4802.5510, 4802.5600, 4802.5700, 4802.6100 and 4802.6200 into Pakistan originating in and/or exported from Federative Republic of Brazil (Brazil), People's Republic of China (China), Republic of Indonesia (Indonesia), State of Japan (Japan) and Kingdom of Thailand (Thailand) hereinafter referred as (the "Exporting Countries").

As per information of the domestic industry, a considerable quantity of the investigated product i.e. Certain Paper, is also being imported under some additional PCT Codes (4802.5590, 4802.5890, 4802.6990, 4804.1100, 4809.9000, 4810.1390, 4810.2900, 4810.9200, 4811.4100 hereinafter referred as additional PCTs) to avoid antidumping duties levied by the Commission. Since, in an antidumping investigation, it is the product that is subject to antidumping duty and PCT Codes are merely used for their classification for collection of taxes / duties including antidumping duty, hence the domestic industry has considered the volume of dumped imports of investigated product under these additional PCTs as well. The Commission has access to PRAL import data wherein it can verify the instant fact from description of products imported under the above additional PCTs. Keeping in view the above, the Commission is requested to take appropriate action to make sure that antidumping duties are not avoided by importers.

PAGE NO

1) APPLICANT'S IDENTIFICATION

1.1 Your application is from

- i) A single company (✓)
or
ii) Association
or
iii) Jointly from the whole industry

1.2 a) Identification of the applicant:

Name: Bulleh Shah Packaging (Private) Limited
Address: Shahrah-E-Roomi, P.O Amer Sidu, Lahore
Telephone no: +42-42-35811541-6
Fax no: +92-42-3581214
E-mail address: pb-sales@bullehshah.com.pk

b) Name(s) of the applicant's authorized officer dealing with the case.

Name: Waqas Munir
Designation: Chief Financial Officer (CFO)
Address: Shahrah-E-Roomi, P.O Amer Sidu, Lahore.
Telephone no: +42-42-35811541-6
Fax no: +92-42-3581214
E-mail address: waqas.munir@bullehshah.com.pk

PAGE NO

c) Name(s) of the applicant's authorized consultant / attorney: -

Name: Saifullah Khan
Designation: Managing Partner
S.U.Khan Associates Corporate & Legal Consultants
Address: 92-Razia Sharif Plaza, first floor, fazal-e- haq
road, blue area, Islamabad.
Telephone no: +92-51-2347441-42
Fax no: +92-51-2344743
E-mail address: saifullah.khan@sukhan.com.pk

1.3 Mention your accounting year

(Jan 01 – Dec 31)

(Financial Statements for the last three years (both audited and unaudited of the Applicant are provided as Annexure-A).

Initially M/s Bulleh Shah Paper Mill (Private) Limited was incorporated as a Private Limited Company under the Companies Ordinance 1984 in 2005 as a wholly owned subsidiary of Packages Limited whereas it started commercial production in 2007. In 2012, the name of the company M/s Bulleh Shah Paper Mill (Private) Limited was changed to M/s Bulleh Shah Packaging (Private) Limited and in April 2013, the company started commercial operation as an independent entity. At that time Bulleh Shah

PAGE NO

Packaging (Private) Limited was a joint venture between Packages Limited and Stora Enso South Asia Holdings AB of Sweden. In 2017, Packages Limited purchased 35% share held by Stora Enso and Bulleh Shah Packaging (Private) Limited became wholly owned subsidiary of Packages Limited.

The Company's principal activity is manufacturing of paper, paper-board and other packaging items. Major products of the company include Writing & Printing Paper, Photocopy Paper, Coated Bleach Board, One Side Coated Duplex Paperboard Grey Back, Liquid Packaging Board (LPB), Test Liner and Fluting/Corrugated medium paper. The Company's production facility is located at Kasur. The investigated product is mainly used for writing, printing, photocopying and other graphic purposes and sold in reels, sheets and A4 size etc.

PAGE NO

2) INDUSTRY IDENTIFICATION

2.1 List details of all domestic producers (including the Applicant) of the like product whether supporting, opposing or silent, in the format given below:

S #	Name	Tel & Fax	Authorized Officer	Share in domestic production (%age)	Supporting/ Opposing/ Indifferent
1.	Bulleh Shah Packaging (Pvt) Limited	042 - 35811541-6	Waqas Munir – CFO		Applicant
2.	Century Paper & Board Mills Limited	021 - 35698000	Aftab Ahmad – CEO		Supporting
Total Domestic Industry					

2.2 Provide details of an industry association (if any) including producers of the domestic like product.

The Applicant does not have any industry association specifically for the product concerned.

2.3 Describe any known relationship the interested party(s) to this application may have with the foreign exporter or producer, or with a Pakistani importer of the product under consideration.

The applicant does not have any relationship with the foreign exporters or producers, or with any Pakistani importer of the product under consideration.

PAGE NO

3) IDENTIFICATION OF IMPORTER(S)

3.1 Give details of importers of the product subject to anti-dumping duty in the following format:

S #	NAMES OF IMPORTERS	ADDRESS
1	Variety Papers	
2	Atique Traders	
3	Jamal & Brothers	
4	Salman Paper Products (Pvt.) Limited	
5	Madiha International (Pvt.) Limited	
6	Gul Impex	
7	Office World	
8	Amanco	
9	Ubc Convertec (Pvt) Limited	
10	Al Hamra Traders	
11	Art & Graphics (Pvt) Ltd.	
12	Trade International	
13	Junaid Traders	
14	Z.A. Corporation	
15	Premier Copy (Pvt.) Limited	

PAGE NO

16	Rayyan International	
17	Paradise Press (Private) Limited.	
18	Times Business Aids	
19	M/S Hunain Paper Mart	
20	Tick Industries (Private) Limited	
21	Salman Enterprises	
22	Ali's Trading Company	
23	Cloud Traders	

PAGE NO

4) LIKELY CONTINUATION OR RECURRENCE OF INJURY

- 4.1 Describe the significance of the existing definitive anti-dumping duty imposed in terms of its effect on the overall state of the domestic industry.

The existing antidumping duty ranging from 10.62% to 39.10% of C&F value was imposed against dumped imports of certain paper importable from the Federative Republic of Brazil ("Brazil"), People's Republic of China ("China"), Republic of Indonesia ("Indonesia"), State of Japan ("Japan") and Kingdom of Thailand ("Thailand") hereinafter referred as (the "Exporting Countries") for a period of five years effective from March 30, 2018. However, the domestic industry could not get the benefit of antidumping duties due to various stay orders against imposition of antidumping duties. Therefore, antidumping duty was not in place for the major part of total duration for which antidumping duty was levied by the Commission. Secondly, the pandemic also played its role and effected the consumption of certain paper not only in Pakistan but also globally.

During the early months of the pandemic, there was a significant decrease in demand for writing and printing paper as many businesses and offices closed or transitioned to remote work, leading to a reduction in overall printing and paper usage. This was particularly noticeable in industries such as education and tourism, where there was a sharp decline in demand for printed materials. ~~In addition, there were also supply chain disruptions and shortages of certain~~ paper products during the pandemic, which also has affected overall

PAGE NO

consumption levels. That is why the domestic sales as well as volume of imports of certain paper decreased significantly. The domestic sales of domestic industry reduced from 26.96% of the domestic market during POI to 23.29% of the domestic market during first year of POR i.e. Jul 20-Jun 21 which included the period of shutdowns due to Covid. Similarly, the volume of dumped imports decreased from 69.97% of the domestic market to 58.84% of the domestic market over the same period.

During the subsequent year Jul 21 – Jun 22, domestic sales of domestic industry remained same. On the other hand, the volume of dumped imports increased significantly from 58.84% of the domestic market to 67.07% of the domestic market during Jul 21-Jun 22. This was because antidumping duties were not in place during the POR due to various stay orders filed for by various importers from time to time. However, during last year of POR i.e. Jul 22-Jun 23, the volume of dumped imports decreased to 62.16% of the domestic market. Reason being, imports were temporarily restricted during the start of this year to address current account deficit.

Antidumping duties would have greater significance for the domestic industry that was adversely affected due to dumped imports from exporting countries. But in the absence of levy of antidumping duties the injury to the domestic industry continued. The benefits that it could have gained in the fair trade environment could not be enjoyed by the domestic industry. Therefore, the dumping and injury both continued throughout the POR.

PAGE NO

An analysis of landed cost of dumped imports with and without antidumping duties and average ex-factory prices of antidumping duties have been carried out below to demonstrate the significance of antidumping duties for the domestic industry in case the same would have been in place during the POR.

Paper consumption patterns are depending on work patterns. Remote work and digital communication is continuing to play a significant role in many industries, which is leading to a continued reduction in overall paper consumption and this may have a long-term impact on the paper industry. Many companies and organizations are looking to reduce their environmental impact, and this may lead to a continued shift towards digital solutions and away from paper-based products. This may contribute to an even significant threat of material injury and likelihood of continuation of dumping and injury to the domestic industry. Reason being, the countries already having abundant supply of paper will face reduced demand from their own markets and from other export destinations as well. This will create an exportable surplus in these countries which will eventually be dumped in order to maintain operating levels at ideal levels.

At the time of already reducing demand, exportable capacities in exporting countries and in the presence of established networks of exporters in Pakistan, dumped imports will pose even bigger threat of material injury to the domestic industry if the antidumping duties are terminated.

Levy of antidumping duty on dumped imports of certain paper did not provide the domestic industry much wanted relief. Antidumping duty was not in place

PAGE NO

for the whole POR but for the few months only due to various stay orders against imposition of antidumping duty. Therefore, the domestic industry was not being able to increase its production or sales in the domestic market during most of the time of POR.

Paper is a commodity and its demand is highly price sensitive. If imported product is lesser in price, there will be a shift towards imports and if imported product is higher in prices, there will be a shift towards domestic product. The imported product had caused a price undercutting of 6.83% during the original POI which continued during the POR. Antidumping duties were not in place for most of the time during POR and the landed cost of dumped imports continued to coerce the domestic prices. Due to insignificant price difference between the prices of dumped imports and domestic ex-factory prices, it was difficult for the domestic industry to compete with dumped imports fully and increase its production and sale.

i. Volume of Imports:

Provide details of volume and value of import of the product subject to anti-dumping duty as per Appendix I. (*Where the measures involve imports from more than one country, please provide the above information for each country, separately*)

The Appendix I and Appendix-II are showing the details concerning import of product subject to antidumping duty from subject dumped and non-dumped sources during the last three years on quarterly basis.

PAGE NO

To analyze the impact of dumped imports on the domestic industry, the imports for the last three years (Jul 20 – Jun 21, Jul 21 – Jun 22 and Jul 22 – Jun 23) along with the imports in the original investigation period i.e. Oct 14 - Sep 15, have been provided in the table below:

Table-1

Year/Period	Qty (MT)	Imports from Subject Dumped Source as a percentage of	
		Domestic Consumption*	Domestic Production**
Oct 14 - Sep 15 Original POI	100.00	69.97%	270.30%
Jul 20 – Jun 21	78.84	58.84%	302.99%
Jul 21 – Jun 22	90.99	67.07%	288.41%
Jul 22 – Jun 23	75.12	62.16%	161.36%

* BSP Sales + Total Imports

** BSP production only

Note:

- i. Total Imports from Subject Dumped Sources of the product under consideration for the Original POI has been indexed as 100 and the imports for the POR have been indexed accordingly.
- ii. Information in the above table is provided to the Commission in confidence under Section 31(2)(a) of the Act since its disclosure would lead to disclosure of by nature confidential information of the Applicants (mentioned in other tables of this application) which is not publically available. Hence provided to the Commission in confidence under Section 31 of the Act.

As can be seen from the table above, there was a contraction in the domestic market during first year of POR as compared to POI. This was due to the effect of pandemic. However, during the second year of POR, there was minimal expansion in the domestic market as compared to previous year. During the

PAGE 110

third year of POR, there was a significant decrease in overall market due to multiple factors, thoroughly mentioned in the later part of this document.

Dumped imports decreased during the first year of POR due to the effect of pandemic but thereafter increased in volume as compared to the first year of POR. This was due to excess capacities available in these countries which are meant for export. The volume from dumped sources kept on increasing during the POR. The share of other sources was also taken up by the dumped imports and domestic industry could not increase or even maintain its production, capacity utilization, sales and market share. However, there was unannounced restriction on imports during the start of this year (i.e. 2023) to curtail current account deficits, which fortunately helped the domestic industry to increase its sales volume (upto 41.47% over the preceding year). But it is pertinent to mention that it was a temporary phenomenon.

Moreover, due to the absence of the antidumping duties in the entire period of review or majority of the time during period of review, the domestic industry could not take material benefit of levy of antidumping duties in the POR. Had there been antidumping duties levied on dumped imports, there would have been significant reduction in volume of dumped imports as the quantum of antidumping duties would have sufficiently increased the landed cost of dumped imports. Resultantly, the dumped imports would not have been lucrative for the user industry. Therefore, to enjoy the actual benefits of antidumping duties, domestic industry demands continued imposition of antidumping duties for a period of five years. Otherwise, the dumped imports will be continued and kept on causing continued injury to the domestic industry.

PAGE NO

ii. Sales & Output:

- a) Provide information, on a quarterly basis showing sales volume by the domestic industry and its share in the domestic market, for the most recent three years as per Appendix II.

Quarterly information on sales and its share in domestic market is provided in Appendix – II.

- b) Provide evidence of the size of the domestic market for the most recent three years.

Domestic market consists of domestic sales and imports. Domestic sales can be verified from the data provided by the Applicant, whereas, imports are estimated on the basis of market intelligence of the applicant.

The requisite data/information is as follows:

Table -2

Year	Share of Domestic Industry in the Domestic Market		Share of Dumped Imports in Domestic Market		Share of Other Imports in Domestic Market		Total Domestic Market	
	MT	%	MT	%	MT	%	MT	%
Oct 14 - Sep 15 Original POI	26.96	26.96%	69.97	69.97%	3.07	3.07%	100.00	100%
Jul 20 – Jun 21	21.83	23.29%	55.16	58.84%	16.76	17.87%	93.75	100%
Jul 21 – Jun 22	21.83	22.99%	63.67	67.07%	9.43	9.93%	94.92	100%
Jul 22 – Jun 23	30.88	36.52%	52.56	62.16%	1.12	1.32%	84.56	100%

Note:

- i. Total Domestic Market of the product under consideration for the Original POI has been indexed as 100.
- ii. Information in the above table is provided to the Commission in confidence under Section 31(2)(a) of the Act since its disclosure would lead to disclosure of by nature confidential information of the Applicants which is not publicly available. Hence provided to the Commission in confidence under Section 31 of the Act.

As the antidumping duties were not applicable during most of the POR, therefore, the domestic industry could not increase its market share and it decreased from 26.96% during the POI to 23.29% during the first year of POR. During the second year of POR, it further decreased to 22.99% and then, in the third year of POR, it rose to 36.52%, primarily due to restriction on imports and LC opening issues during the start of this year (i.e. 2023) by federal government to manage the depleting forex reserves. On the other hand, the share of dumped imports also decreased from 69.97% to 58.84% during the first year of POR, increased to 67.07% in the second year of POR and then fell to 62.16% of the total domestic market due to the earlier mentioned reason. Here it is also necessary to analyse that import

from non-dumped sources during this period also fell to 1.32% in the last year of POR from 17.87% in the first year of POR.

There cannot be any improvement in the market share of domestic industry unless antidumping duties are continued without any hindrances for a sufficient period of time at least for five years initially. The continued imports at dumped prices and continued injury to the domestic industry is evident of the fact that the same situation will continue if the antidumping duties are terminated. In order to avoid this likelihood, it is necessary that the antidumping duties levied on dumped sources may be continued for a period of 5 years.

c) Provide details of inventory and changes in sales as per Appendix III.

Please have a look at the table given below:

Table-3 (MT)

Period	Opening Inventory	Production	Sales		Closing Inventory	Change in Inventory
			Domestic	Export		
Oct 14 - Sep 15 Original POI	39.95	100.00	105.53	-	34.41	- 5.53
Jul 20 – Jun 21	18.39	74.66	89.53	-	3.52	- 14.87
Jul 21 – Jun 22	3.52	90.52	89.50	-	4.54	1.02
Jul 22 – Jun 23	4.54	133.57	126.62	-	11.48	6.95

Note:

- i. Total production of the product under consideration for the Original POI has been indexed as 100.
- ii. Information in the above table is provided to the Commission in confidence under Section 31(2) of the Act as information on sales and inventories is by nature confidential information under Section 31(3) of the Act.

PAGE NO

Whereas production figures are claimed confidential as their disclosure may lead to disclosure of by nature confidential information.

- iii. *Disclosure of information in the above table could have significant competitive advantage to the competitors or could have significantly adverse effect on the Applicant. However, for a meaningful analysis non confidential summary is provided in the above table in pursuance of Section 31(5) of the Act.*

The above data shows that the inventories have decreased during the POR (except for the third year of POR which was abnormal for the reasons mentioned earlier) as compared to the POI. This is basically because domestic industry reduced its production of the product concerned keeping in view the increased volume of dumped imports. Domestic industry was not able to increase its production and sales due to minor difference in prices of imports from the dumped sources. Had there been antidumping duty on dumped sources (which could have played a detrimental role), imports from dumped sources would not have a major share in the domestic market, resulting in betterment of the domestic industry on this account.

In the above situation, if the antidumping duties are removed from dumped sources it will cause continuation of further dumped imports from these sources which would result into continuation of material injury to the domestic industry on account of production, sales and inventories. As discussed above, the dumped sources will have excess supply of certain paper which will be continued to dump in Pakistan market at highly dumped prices in the absence of antidumping duties.

iii. Price Effects:

PAGE NO

Please provide details of the current and likely effect of the imports of the product subject to anti-dumping duty on prices of the domestic like product.

Information on price effects should be provided for each product, model or type, subject to anti-dumping duty as per Appendix IV for the most recent three years on quarterly basis.

The required information is given in Appendix-IV, however price effects with analysis are given in subsequent paras.

Price undercutting:

In this regard Applicant's average ex-factory price of domestic like product has been compared with average landed cost of dumped imports in the following table: -

(Table - 4)

Year/Period	Price undercutting (%age)
Oct 14 - Sep 15 Original POI	6.83%
Jul 20 – Jun 21	-
Jul 21 – Jun 22	-
Jul 22 – Jun 23	-

As the antidumping duties were not in place for a major part of the POR, the comparison of landed cost including antidumping duties with average ex-factory prices of domestic industry is not relevant. Therefore, a comparison of

PART NO

landed cost without antidumping duties and average ex-factory prices of domestic industry has been presented below:

Year/Period	Price undercutting (%age) (without AD Duty)
Oct 14 - Sep 15 Original POI	6.83%
Jul 20 – Jun 21	8.68%
Jul 21 – Jun 22	-
Jul 22 – Jun 23	-

Dumped imports were undercutting the prices of the domestic industry by a margin of 6.83% during the POI. This proven undercutting resulted in losses of the domestic industry and encouraged the Commission to levy antidumping duties on such imports. The level of price undercutting increased expressively during the first year of POR in the absence of antidumping duties and with the continuous penetration of dumped imports throughout POR, kept hurting the domestic industry. The import data also shows that the volume of dumped imports was increasing due to dumped prices offered by the dumped sources (except for the third year of POR which was abnormal for the reasons mentioned earlier) and insignificant price difference did not let the domestic industry to increase or even maintain its market share.

As depicted below, it is evident that if the levied antidumping duties were in place, it could have played significant role in positively contribute towards the growth of the domestic industry and the current state of industry would have been in a much better position. Moreover, as mentioned earlier, since the market

PAGE NO

is price sensitive, the difference in average ex-factory price of domestic like product and landed cost per MT (upto 22%), depicted in the table below, would have induced the user industry to divert its consumption, more towards locally manufactured domestic like product.

PERIOD	Average Ex-Factory Price of Domestic Like Product excluding S.Tax	LANDED COST PER MT - DUMPED SOURCES (With AD Duties)	Difference in Average Ex-Factory Price of Domestic Like Product and Landed Cost of Dumped Imports	
			Absolute	%age
Jul-Sep 2020	173,304.02	177,922.71	4,618.69	2.60%
Oct-Dec 2020	166,386.70	162,371.73	-	-
Jan-Mar 2021	170,974.01	166,050.89	-	-
Apr-Jun 2021	183,106.39	192,405.82	9,299.43	4.83%
Jul 20-Jun 21	172,775.68	173,089.94	314.25	0.18%
Jul-Sep 2021	195,381.85	218,496.91	23,115.05	10.58%
Oct-Dec 2021	213,632.68	229,217.02	15,584.34	6.80%
Jan-Mar 2022	224,738.30	240,712.76	15,974.46	6.64%
Apr-Jun 2022	270,163.36	298,674.70	28,511.34	9.55%
Jul 21-Jun 22	225,013.77	253,294.17	28,280.39	11.17%
Jul-Sep 2022	298,837.11	382,202.48	83,365.37	21.81%
Oct-Dec 2022	322,047.74	358,868.11	36,820.36	10.26%
Jan-Mar 2023	383,338.69	493,600.14	110,261.45	22.34%
Apr-Jun 2023	460,775.18	511,312.55	50,537.37	9.88%
Jul 22-Jun 23	367,707.56	412,543.74	44,836.18	10.87%

Had there been antidumping duties duly collected on dumped imports during POR, such increased level of price erosion effect of imports could have been

PAGE NO

avoided and the domestic industry would have been able to increase its market share in the presence of level playing field. Therefore, in the above situation, it is requested to the Commission to continue the existing antidumping duties on dumped sources. If the antidumping duties are not continued, it will cause continuation of dumped imports from dumped sources which would result into continuation of material injury to the domestic industry on account of price undercutting.

Price Depression:

It is given in the following table:

(Table-7)

Rs. /MT

Year/Period	Price Depression
Oct 14 - Sep 15 Original POI	-
Jul 20 - Jun 21	-
Jul 21 - Jun 22	-
Jul 22 - Jun 23	-

As the cost of production of certain paper increased throughout the POR, therefore, there was no price depression. Further, there was significant difference between the landed cost of dumped imports and average prices of domestic industry that the domestic industry could not reduce its prices to take market share in the domestic market. In this situation, the importance of levy

PAGE NO

and continuation of antidumping duties for the domestic industry can be easily understandable.

If antidumping duties are removed now, there is every likelihood of more dumped imports from dumped sources compelling the domestic industry to depress its prices or sacrifice its market share. To avoid likely price depression, it is requested to continue antidumping duties on dumped sources.

Price Suppression:

(Table - 8)

Rs. /MT

Year/ Period	Increase/ (decrease) in cost of production	Increase/ (decrease) in price	Price Suppression
Oct 14 - Sep 15 Original POI	3,584	265	3,319
Jul 20 – Jun 21	-	-	-
Jul 21 – Jun 22	32.17%	30.23%	1.94%
Jul 22 – Jun 23	66.28%	63.42%	2.87%

As can be seen from the table above, the cost to make and sell of the domestic industry has increased throughout the POR as compared to original POI. The domestic industry increased its prices but not to the extent of increase in its cost to make and sell. During the second year of POR, the increase in cost to make and sell was recorded at 32.17% over the previous year whereas it only increased its prices to the tune of 30.23%. Same goes with the third year of POR where the increase in cost to make and sell was recorded at 66.28% over the previous year whereas it only increased its prices to the tune of 63.42%. Hence, the domestic

PAGE NO

industry could not pass on the increased cost of production to the end user and suffered on account of squeezed profitability in percentage terms.

Had there been antidumping duties duly collected on dumped imports during POR, such increased level of price suppressing effect of imports could have been avoided and the domestic industry would have been able to maximize its market share. Further, if antidumping duties are discontinued at this point of time, it will result in more severe price effects to the domestic industry.

iv. Profit & Loss:

Explain how the domestic industry's gross and net profits on sales of the domestic like product would be affected if the anti-dumping duty expires. Please provide information on sales, cost of sales and profits for the most recent three years in Appendix V.

Please see Appendix V to this application. Copies of audited and un-audited accounts are also attached as Annexure-A. Based on Appendix-V, the position of gross and net profit during last 3 years remained as under: -

PAGE NO

(Table – 9)

Rs. (in millions)

Year/Period	Net Profit/(Loss)
Oct 14 - Sep 15 Original POI	-100.00
Jul 20 – Jun 21	315.11
Jul 21 – Jun 22	376.71
Jul 22 – Jun 23	777.85

Note:

- i. Net loss of the domestic industry during the original POI has been indexed as 100.
- ii. Information in the above table is provided to the Commission in confidence under Section 31(2) of the Act since information on profits/ (losses) is by nature confidential information under Section 31(3) of the Act. Its disclosure could have significant competitive advantage to the competitors or could have significantly adverse effect on the Applicant. However, for a meaningful analysis non-confidential summary is provided in the above table in pursuance of Section 31(5) of the Act.

The profits of the domestic industry improved during the POR but the potential of making profits in case of optimal production and sales can be well-imagined. Main reasons for such profitability were exchange rate depreciation and higher freight costs making landed cost of dumped imports higher and giving a cushion to domestic industry to increase its prices in accordance with the increase in its cost to make and sell. But obviously these factors are not permanent. Such profit could have been improved even further in case of levy of antidumping duties during the POR. The domestic industry would have been able to increase its production and sales resulting in reduced per unit cost and more sales would result in more profits. Here it is pertinent to mention that instant apparent increased profitability of the product under review does not depict the real scenario as it reduced in relative terms as evident from the table

below:

PAGE NO

Year/Period	Domestic Sales Price to Net Profit Ratio
Jul 20 – Jun 21	15.32%
Jul 21 – Jun 22	14.06%
Jul 22 – Jun 23	12.55%

In such a situation, if antidumping duty is removed from dumped sources, there is likelihood of continuation of dumping and injury from dumped sources, resulting into further deterioration in profitability of the domestic industry. Therefore, it becomes imperative to continue the existing antidumping duties on the product under review for another period of 5 years.

v. **Utilization of Production Capacity:**

- a) What is the domestic industry's production capacity for the domestic like product? Explain the basis e.g. machine capacity, number of shifts, and state the units of measurement, for example tons, meters, liters etc.

Capacity Utilization of the domestic industry remained as under:

PAGE NO

(Table-10)

Year	Capacity Utilization%
Oct 14 - Sep 15 Original POI	22.73%
Jul 20 – Jun 21	16.97%
Jul 21 – Jun 22	20.58%
Jul 22 – Jun 23	30.37%

Domestic industry could not increase its capacity utilization (as compared to original POI) during the first two years of POR because it could not increase its market share in the domestic market due to continuous penetration of dumped imports causing an undercutting of around 9% during the first year of POR and insignificant difference in average prices of domestic like product and average landed cost of dumped imports. The increased capacity utilization in the third year of POR was primarily due to temporary restriction on imports and LC opening issues by federal government to manage the depleting forex reserves but, as mentioned earlier, it was temporary phenomenon.

The domestic industry could have utilized its normal capacity levels in the absence of dumped imports but non-application of antidumping duties during the POR due to stay orders did not let the domestic industry to increase its capacity utilization to a significant level. If the antidumping duties are discontinued now, it will result in continuation of dumped imports and injury to the domestic market. Keeping in view the significant potential in the domestic market, a reasonable level of capacity was installed by the domestic industry. Recently, the domestic industry has removed some bottlenecks at its

PAGE NO

manufacturing facility which also had increased its installed capacity to the tune of 160,000 MT per annum which is enough to cater the entire demand of the domestic market.

In order to utilize such capacity, continuation of antidumping duties for a period of five years is very much needed to safeguard the huge investments. If the antidumping duties are not continued, it will cause continuation of dumped imports which would result into continuation of injury to the domestic industry on account of capacity utilization.

- b) What was the domestic industry's capacity utilization rate for the most recent three years? Please supply information on installed capacity and quantity produced by each unit of the domestic industry as per Appendix VI on quarterly basis.

Quarterly information on quantity produced by the domestic industry for the most recent three years is provided in Appendix VI.

4.2 Other Injury Factors:

Provide Information, for the domestic industry, on following factors for the last three years on quarterly basis:

➤ Cash Flow:

It is given in the following table: -

PAGE NO

(Table-11)

(Rs in Million)

Year	Cash Flows from operating activities
Oct 14 - Sep 15 Original POI	-1,979
Jul 20 – Jun 21	1,609
Jul 21 – Jun 22	-649
Jul 22 – Jun 23	5,640

The increased cash flows during the last year of POR was primarily due to the changes in working capital, mainly effected by reduced raw material inventory levels as there were LC opening issues at domestic level, the domestic industry managed its production through existing inventories of pulps. Moreover, the LCs which were opened during the instant period were for the longer credit period, which provided cushion to the domestic industry on account of positive cash flows. The instant fact can be verified during on-the-spot verification at the premises of Applicant domestic industry. If the antidumping duties are not continued, it will cause continuation or recurrence of dumped imports from these sources which would result into further severe material injury to the domestic industry on account of cash flows.

➤ Employment, salaries & wages and productivity:

Employment, salaries & wages and productivity for the year 2017-18 to 2019-20 are given below:-

PAGE NO

(Table-12)

Year	Number of employees	Productivity per worker in MT	Salaries and wages Rs. per MT.
Jul 20 – Jun 21	100.00	100.00	100.00
Jul 21 – Jun 22	103.51	107.95	102.17
Jul 22 – Jun 23	108.70	88.28	149.04

Note:

- i. Figures concerning Number of employees, Productivity per worker and Salaries and wages per MT for Jul 20 – Jun 21 have been indexed as 100.
- ii. Information in the above table is provided to the Commission in confidence under Section 31(2) of the Act since such information is by nature confidential information specified under Section 31(3). Its disclosure could have significant competitive advantage to the competitors or significant adverse effect on the application. For reasonable understanding of the substance of information provided in the above table, non-confidential summary compliant with Section 31(5) of the Act has been provided.

The information is provided for the entire company and no meaningful analysis can be made on this basis concerning significance of antidumping duties.

➤ **Growth:**

Based on Applicant data, growth during past three years remained as under: -

PAGE 017

(Table-13)

Year	Increase / (Decrease) in Fixed Assets (Rs. In Million)
Oct 14 - Sep 15 Original POI	-173.678
Jul 20 – Jun 21	809
Jul 21 – Jun 22	3,603
Jul 22 – Jun 23	11,049

The growth figures are for entire company that also produces products in addition to product under review. There cannot be any growth in the fixed assets installed for the product under review when the existing capacities are not being utilized optimally due to non-application of antidumping duties.

➤ Ability to raise investment:

The applicant could not utilize its existing capacity optimally, the question of raise further investment does not arise.

➤ Return on investment:

The return on total investment is provided in the following table:

NO

(Table-14)

Year	Return on investment %
Oct 14 - Sep 15 Original POI	-3.17%
Jul 20 – Jun 21	29.03%
Jul 21 – Jun 22	14.63%
Jul 22 – Jun 23	12.23%

Domestic industry was able to earn positive and increased return on investment throughout the POR when it increased its sales prices in accordance with its cost to make and sell. This was possible due to exchange rate depreciation and higher freight cost effecting landed cost of dumped imports but these factors are obviously not permanent and will not save domestic industry from adverse effects of dumped sources.

Removal of antidumping duty will of course adversely affect the sale prices and profitability of the Applicant thereby adversely affecting its return on investment. Hence, there is a need to continue the existing antidumping duties on the dumped source for a further period of 5 years.

4.3 Anticipated Adverse Effects:

Does the domestic industry anticipate continuation or recurrence of injury in future if the anti-dumping duty imposed on the investigated product from exporting country is terminated?

PAGE NO

Please mark "✓" as appropriate.

NO

✓ YES

If yes, Please provide appropriate explanation and documentary evidence to support this claim in light of the factors and indices listed below.

➤ Volume of Imports subject to antidumping duty:

Comparison of volume of imports subject to antidumping duty during original POI and the current POR is provided in the following table;

(Table-15)

Country	(Oct 14 – Sep 15) (Original POI)		(Jul 22 - Jun 23) (Period of Review)	
	Imports (MT)	C&F Price (US\$/MT)	Imports (MT)	C&F Price (US\$/MT)
BRAZIL	5.86	100.88	-	-
CHINA	5.18	96.32	0.48	116.65
INDONESIA	74.01	98.72	63.74	141.22
JAPAN	5.95	98.93	0.70	112.43
THAILAND	9.01	131.37	10.19	147.73
Total Dumped	100.00	100.00	75.12	141.67
Total Non-Dumped	4.39	111.53	1.60	113.10

Note:

- i. Volume of dumped imports and corresponding C&F Price US\$/ MT during the original POI (Oct 14 – Sep 15) have been indexed as 100 and the remaining figures have been indexed accordingly.

- ii. *Volume of import from dumped source and its corresponding C&F Price has been kept confidential since its disclosure would lead to disclosure of by nature confidential information of the Applicants which is not publically available. Hence provided to the Commission in confidence under Section 31 of the Act.*

As regards to volume of dumped imports, it is evident from the data provided in the above table that overall dumped imports have maintained their market share during POR. The reason, as discussed above, is non-application of antidumping duties during most of the POR due to stay orders by high courts. It is quite clear from the strong presence of dumped imports that the benefit that was expected to achieve through levy of antidumping duties could not be achieved due to non-imposition of antidumping duties. Indonesia maintained its original volume during the POR. This is because it had surplus capacities and production of paper. After Indonesia, Thailand has second largest share in imports to Pakistan and this share has increased considerably during the POR as compared to POI. This is also because export-oriented growth of paper mills in Thailand. Other dumped sources, except Brazil, also kept their presence in the domestic market and did not leave exporting to Pakistan. Had there been antidumping duty in force, dumped imports would not have been able to maintain or increase their market share in domestic market.

➤ Effects of the product subject to antidumping duty on the prices of the domestic like product:

As per Commission's final determination of the original investigation, the domestic industry suffered material injury on account of price undercutting during the POI. The same situation continued during the POR. As the duties

PAGE NO

were not in force, landed cost of dumped imports continued to undercut / suppress the prices of domestic industry.

Had there been antidumping duties on dumped imports during the POR, the domestic industry would not have been struggling against the dumped imports to increase its production, sales, market share and profitability etc. Therefore, if antidumping duties are removed there is likelihood of more pronounced injury on account of price effects to the domestic industry.

PAGE NO

5. LIKELY CONTINUATION OR RECURRENCE OF DUMPING

- 5.1 Does the domestic industry anticipate continuation or recurrence of dumping in the future if the anti-dumping duty on product subject to anti-dumping duty, from exporting country is terminated?

Please mark "√" as appropriate.

√ YES

NO

If yes, please provide reasons and supporting documentary evidence.

Likely continuation or recurrence of dumping of the investigated product into Pakistan has been explained in the following paragraphs keeping in view following factors were frequently used by the Commission in its various earlier sunset review investigations.

- i. Whether exporters/foreign producers of the Exporting Country stopped or continued exporting to Pakistan the product under review after imposition of antidumping duties;
- ii. Likelihood of dumping and calculation of likely dumping margins for exporters/ foreign producers of the Exporting Country;

PAGE NO

- iii. Whether exporters of the Exporting Country have developed other export markets after imposition of antidumping duties; and
- iv. Whether Exporting Country has exportable surplus of the product under review.

Evaluation of the above factors / considerations is provided in the following paragraphs.

- i. Whether Exporters of the Exporting Country Continued or Stopped Exporting to Pakistan the Product Under Review after Imposition of Duties:

Volume of imports of the product under review from dumped sources to Pakistan declined significantly after imposition of antidumping duties as compared to the dumped imports during the original POI. Following table shows the imports of the product under review before and after imposition of antidumping duties.

Table-16

Period	Dumped Imports as (%) of total domestic market	Rate of Antidumping duty imposed
Oct 14 - Sep 15 Original POI	69.97%	10.62% to 39.10%
Jul 20 - Jun 21	58.84%	
Jul 21 - Jun 22	67.07%	
Jul 22 - Jun 23	62.16%	

PAGE NO

The above table clearly indicates share of dumped imports of the product under review from the Exporting Countries maintained its market share during POR due to non-application of antidumping duties. Share of dumped imports of the product under review, which was 69.97 percent of total domestic consumption during the original POI slightly reduced to 67.07 percent of total domestic consumption in the current POR. Further, the share of Indonesia and Thailand has maintained / increased. Hence, it can be concluded that the strong presence of dumped imports of the product under review is only due to non-application of antidumping duties. In case antidumping duties are removed, the volume of dumped imports is likely to increase sharply further since the excess capacities and surplus inventories in the exporting countries are looking for lucrative markets for consumption.

ii. Likelihood of dumping and calculation of likely dumping margins for exporters/ foreign producers of the Exporting Country:

In the original investigation, the domestic industry established the dumping margins based on constructed normal value method since published prices or the evidence of domestic prices of paper in exporting countries could not be found. For the purpose of sunset review investigation, in order to determine likelihood of dumping, the domestic industry has again relied on the constructed normal value method as provided in the Act. Dumping margin thus calculated has been provided in the following table;

MAAF NO

Table-17

Exporting Country	Dumping Margin in % age on C&F Basis
Brazil	48.39%
China	43.45%
Indonesia	12.69%
Japan	48.67%
Thailand	7.57%

Note:

- 1) Evidence of Normal value of certain paper for dumped sources is placed below as Appendix-4.
- 2) Calculation of normal value and Adjusted/Ex-Factory export price for dumped sources is placed below as Annexure-B.

It can be seen from the above table that exporters from dumped sources are still engaged in dumping due to which they are maintaining their share in domestic market. This leads to the conclusion that if antidumping duties (which were imposed but not applicable during POR) are removed, domestic industry would continue to suffer due to dumped imports as it will not be able to gain any share in the domestic market.

iii. Whether exporters of the Exporting Country have developed other export markets after imposition of antidumping duties:

As the antidumping duties did not remain in force for most of the POR, such analysis that the exporters of the exporting countries have developed other export market after imposition of antidumping duties may not be relevant. In

PAGE NO

order to assess the benefit of antidumping duties on domestic industry and behavior of the exporters from dumped sources whether they will shift their exports to other markets, antidumping duties need to be continued for a longer period of five years. The domestic industry has already suffered a lot due to non-application of antidumping duties, they need to be continued so that the domestic industry could get the benefit of fair market competition. From the tables below, it can be seen that exports of product under review has decreased from dumped sources except Indonesia due to reduced demand globally due to the impact of Covid-19 pandemic. Such reduced demand must have created exportable surplus in these dumped sources.

China Exports						
	2017	2018	2019	2020	2021	2022
HS Code	Quantity (tonnes)					
480255	217,818	184,505	232,131	147,309	173,164	369,228
480256	439,035	368,300	356,711	317,309	279,304	298,299
480257	270,909	190,562	250,376	123,198	81,185	216,705
480261	27,246	14,016	12,090	4,045	4,346	37,865
480262	12,096	9,000	14,994	13,302	13,623	27,922
Total	967,104	766,383	866,302	605,163	551,622	950,019

PAGE NO

	Top Export Destinations from China in 2017 under Chapter 4802 (Qty in MT)		Top Export Destinations from China in 2022 under Chapter 4802 (Qty in MT)	
1	Japan	223,743	Japan	146,678
2	Korea, Republic of	130,522	Türkiye	60,123
3	Hong Kong, China	92,349	Hong Kong, China	58,386
4	Iran, Islamic Republic	85,648	Korea, Republic of	52,793
5	Malaysia	79,713	Mexico	49,547
	Total	1,088,333	Total	1,021,834

Brazil Exports						
	2017	2018	2019	2020	2021	2022
HS Code	Quantity tones					
480255	313,454	298,275	331,649	309,969	198,807	224,320
480256	508,198	507,282	508,247	400,686	465,581	465,352
480257	96,807	85,607	91,856	98,687	108,668	92,986
480261	0	187	9	26	102	586
480262	0	0	8	0	0	-
Total	918,459	891,351	931,769	809,368	773,158	783,244

	Top Export Destinations from Brazil in 2017 under Chapter 4802 (Qty in MT)		Top Export Destinations from Brazil in 2022 under Chapter 4802 (Qty in MT)	
1	Cayman Islands	142,519	United States of America	159,554
2	Peru	104,089	Peru	111,154
3	Chile	88,242	Chile	92,366
4	United Kingdom	82,946	United Kingdom	63,638
5	United States of America	63,652	Colombia	37,616
	Total	943,351	Total	806,658

Indonesia Exports						
	2017	2018	2019	2020	2021	2022
HS Code	Quantity tones					
480255	408,078	705,442	720,689	785,970	855,467	834,245
480256	1,338,957	1,586,828	1,774,366	1,468,193	1,432,346	1,516,457
480257	919,391	427,031	376,896	532,837	515,019	450,454
480261	-	227	-	13	-	-
480262	222	294	239	78	62	112
Total	2,666,648	2,719,822	2,872,190	2,787,091	2,802,894	2,801,268

	Top Export Destinations from Indonesia in 2017 under Chapter 4802 (Qty in MT)		Top Export Destinations from Indonesia in 2022 under Chapter 4802 (Qty in MT)	
1	China	363,718	Japan	301,852
2	Japan	292,555	China	201,697
3	India	238,333	Philippines	181,937
4	Malaysia	192,114	Malaysia	181,860
5	Philippines	160,290	Mexico	162,734
	Total	2,778,139	Total	2,919,638

Thailand Exports						
	2017	2018	2019	2020	2021	2022
HS Code	Quantity tones					
480255	58,825	55,208	59,436	55,792	63,994	73,108
480256	456,896	412,139	417,044	339,420	345,418	409,292
480257	64,622	49,393	62,074	47,763	34,277	34,230
480261	634	698	960	1,163	1,370	890
480262	351	46	52	277	174	11
Total	581,328	517,484	539,566	444,415	445,233	517,531

PAGE NO

	Top Export Destinations from Thailand in 2017 under Chapter 4802 (Qty in MT)		Top Export Destinations from Thailand in 2022 under Chapter 4802 (Qty in MT)	
1	Korea, Republic of	81,850	Korea, Republic of	76,086
2	Viet Nam	73,097	Viet Nam	69,995
3	China	70,843	China	54,894
4	United States of America	54,166	United Arab Emirates	40,980
5	Malaysia	30,072	United States of America	32,319
	Total	600,486	Total	536,885

Japan Exports						
	2017	2018	2019	2020	2021	2022
HS Code	Quantity tones					
480255	172,288	214,523	150,408	117,566	145,441	136,980
480256	1,642	1,678	1,477	1,426	1,202	1,018
480257	49,436	58,761	35,093	27,784	29,116	20,237
480261	2,341	7,197	4,920	3,074	7,040	18,125
480262	86	41	45	12	19	13
Total	225,707	282,159	191,898	149,850	182,799	176,373

	Top Export Destinations from Japan in 2017 under Chapter 4802 (Qty in MT)		Top Export Destinations from Japan in 2022 under Chapter 4802 (Qty in MT)	
1	Thailand	55,433	China	61,047
2	China	45,588	Taipei, Chinese	35,444
3	Taipei, Chinese	34,373	Korea, Republic of	22,610
4	Viet Nam	25,699	Thailand	20,447
5	Korea, Republic of	23,159	Philippines	16,829
	Total	253,007	Total	202,344

PAGE NO

Source: trademap

The above information indicates that their excess production / inventories as well as production capacities are waiting for lucrative markets which poses a threat of recurrence of dumped imports from the dumped source, if the antidumping duties imposed are abolished. Hence, the duties imposed on dumped sources needs to be continued for another period of 5 years.

iv. Whether Exporting Country has exportable surplus of the product under review.

All of the five exporting countries of paper have export-oriented paper industries and have huge capacities installed to export paper and board and related products to various destinations. Although there are projects to increase installed capacities of paper further but current capacities are also posing increased threat of dumping. Reason being, the demand of writing and printing paper is being reduced gradually due to digitalization. Therefore, the existing capacities are also not operating at optimal levels and are sufficient to determined likelihood of continuation of dumping and injury to the domestic industry. The increased volume of dumped imports during the last year of POR are evident of this.

BRAZIL

As per "Brazil: Market for Printing and Writing Paper 2022" (Annexure-C), there is a decline in domestic consumption as well as exports of paper from Brazil recently. This shows that Brazil must have exportable surplus of paper. The extracts of the article are as follows:

PAGE NO

"Market Size for Printing and Writing Paper in Brazil

In 2021, the Brazilian printing and writing paper market increased by X% to \$X for the first time since 2018, thus ending a two-year declining trend. Overall, consumption, however, showed a perceptible setback. Printing and writing paper consumption peaked at \$X in 2012; however, from 2013 to 2021, consumption remained at a lower figure.

Production of Printing and Writing Paper in Brazil

In value terms, printing and writing paper production rose markedly to \$X in 2021 estimated in export price. Overall, production, however, showed a mild setback. The most prominent rate of growth was recorded in 2018 when the production volume increased by X% against the previous year. Over the period under review, production attained the maximum level at \$X in 2012; however, from 2013 to 2021, production stood at a somewhat lower figure.

Exports of Printing and Writing Paper

Exports from Brazil

In 2021, exports of printing and writing paper from Brazil reached X tons, remaining stable against 2020. In general, exports, however, saw a mild descent. The pace of growth was the most pronounced in 2019 when exports increased by X% against the previous year. As a result, the exports reached the peak of X tons. From 2020 to 2021, the growth of the exports remained at a

PAGE NO

somewhat lower figure. In value terms, printing and writing paper exports shrank modestly to \$X in 2021. Overall, exports, however, recorded a pronounced reduction. The growth pace was the most rapid in 2019 when exports increased by X%. The exports peaked at \$X in 2013; however, from 2014 to 2021, the exports failed to regain momentum."

United States has recently concluded a review of antidumping duties imposed on uncoated paper from Brazil, China, Indonesia and Portugal on January 2022 (Annexure-D) and continued the imposition of measures and analyzed that:

"The uncoated paper industry in Brazil is export oriented and has demonstrated a continuing interest in serving the U.S. market. The United States remained an important export market for uncoated paper from Brazil throughout the period of review, despite the disciplining effect of the order, as evidenced by its continued presence in the U.S. market, and Commerce's recent affirmative anticircumvention determination with respect to Brazil further demonstrates Brazil's interest in supplying the U.S. market. Based on the foregoing, including the increasing volume of subject imports from Brazil during the original investigations, the recent increase in such imports in interim 2021 compared to interim 2020, and the Brazilian industry's excess capacity and export orientation throughout the period of review, we find that revocation of the antidumping duty order on subject imports from Brazil would not likely have no discernible adverse impact on the domestic industry."

W-10

CHINA

United States has recently concluded a review of antidumping duties imposed on uncoated paper from Brazil, China, Indonesia and Portugal on January 2022 (Annexure-D) and continued the imposition of measures and analyzed that:

*The current reviews contain limited new information concerning the Chinese uncoated paper industry, as no Chinese producer or exporter responded to the Commission's questionnaire. The Domestic Interested Parties identified ten firms as possible producers or exporters of uncoated paper in China. The Domestic Interested Parties also provided evidence that the Chinese industry added at least *** short tons of uncoated paper production capacity over the POR. Official Commerce statistics indicate that the quantity of subject imports from China was 36,241 short tons in 2015 (or 0.9 percent of apparent U.S. consumption), 732 short tons in 2016 (or 0.0 percent of apparent U.S. consumption), 604 short tons in 2017 (or 0.0 percent of apparent U.S. consumption), 461 short tons in 2018 (or 0.0 percent of apparent U.S. consumption), 2,462 short tons in 2019 (or 0.1 percent of apparent U.S. consumption), and 1,390 short tons in 2020 (or 0.1 percent of apparent U.S. consumption), for an overall decrease during the period. Subject imports from China were lower in interim 2021 at 58 short tons than interim 2020 at 1,138 short tons (or 0.1 percent of apparent U.S. consumption).*

Information regarding the global paper and paperboard industry, a category which includes in-scope and out-of-scope merchandise, indicates that China is the largest producer of paper and paperboard in the world. In 2020, the top export markets for paper and paperboard from China were Japan, Hong Kong, and South Korea. The United States was among the smallest export markets for paper and

PAGE NO

paperboard from China in 2020, although exports of paper and paperboard to the United States were reported during each year of the period of review. Commerce reached an affirmative anticircumvention determination concerning imports of certain uncoated paper from China to the United States in December 2021, indicating that Chinese producers and exporters remain interested in supplying the U.S. market.

Subject imports from China undersold the domestic like product in 20 of 21 quarterly comparisons during the original investigations, and in one of three quarterly comparisons in these reviews.

Based on the foregoing, including the increasing volume of subject imports from China during the original investigations, underselling of the domestic like product by subject imports from China during the original investigations and continued underselling during the POR, the large size of the paper and paperboard industry in China including the addition of significant production capacity during the POR, and the substantial volume of uncoated paper and paperboard products exported by producers in China, we find that revocation of the antidumping and countervailing duty orders on subject imports from China would not likely have no discernible adverse impact on the domestic industry."

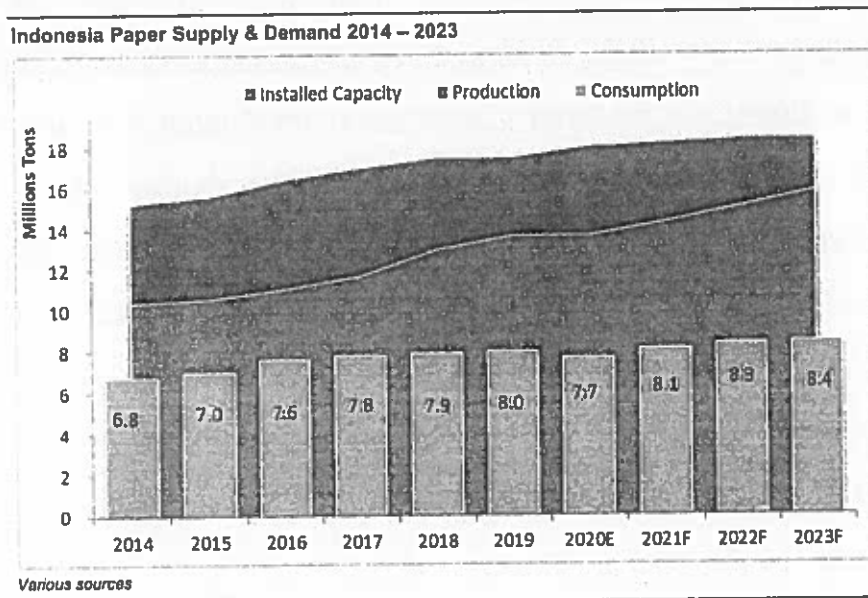
The findings of US Authority shows that China had exportable surplus of paper which can easily be diverted to Pakistan.

INDONESIA

As per Article "Indonesia's Pulp and Paper Industry as GDP Contributor" (Annexure-E) dated Dec 29, 2022,

Production of writing and printing paper is the second largest in Indonesia, even though this type of product experienced a decline in growth in 2020 compared to 2019 with a total production of 5.2 million tons. The decline in production is expected to be due to the declining trend of reading offline mass media due to the pandemic. The pandemic has also forced workers and students to carry out their activities at home which has reduced the use of paper.

This shows that reduced demand will be creating exportable surplus of writing and printing paper in Indonesia. Further, the below graph also shows that installed capacity and production of paper in Indonesia is increasing whereas domestic demand is stagnant.



United States has recently concluded a review of antidumping duties imposed on uncoated paper from Brazil, China, Indonesia and Portugal on January 2022 (Annexure-D) and continued the imposition of measures and analyzed that:

NOTED

“the increasing volume of subject imports from Indonesia in the original investigations, the continued presence of subject imports from Indonesia during the POR, the significant underselling by subject imports from Indonesia during the original investigations, and the high and increasing export orientation of the Indonesian industry, we find that revocation of the antidumping and countervailing duty orders on subject imports from Indonesia would not likely have no discernible adverse impact on the domestic industry.”

Indian investigating authority – Directorate General of Trade Remedies noted in their final findings of “Sunset Review anti-dumping investigation concerning imports of “Uncoated Copier Paper” originating in or exported from Indonesia and Singapore” (Annexure-F) that:

Surplus capacity in Indonesia

The Authority notes that the domestic industry has provided information from Poyry’s Report, RISI Report and data extracted from Food and Agricultural Organisation (FAO). Based on the information provided in these Reports, the domestic industry reported that the unutilized capacity in Indonesia for product under consideration is approximately 6 lakh tons during the POI, which exceeds the gross Indian demand.

It is seen that: the capacities established by the producers is significantly more than the domestic demand. The surplus capacity is 9 times of the demand prevailing in Indonesia. While APRIL group’s capacity is fully utilized, the APP group, which has higher capacities, has significant unutilized capacities. The surplus capacity with APP Group alone is higher than the gross Indian demand for the product.

High export orientation of producers.

The Authority notes that a significant portion of the capacity for the subject goods in Indonesia is meant for export markets. The aggregate information with regard

to domestic sales and export sales by participating producers from Indonesia is given below.

Sales Quantity - PUC (APP Group)	MT	Total	Share of Sales in Percentage	Range
(a) Domestic Sales – PUC	MT	***	***	5-15%
(b) Export Sales - India – PUC	MT	***	***	0-10%
(c) Export Sales - Other Countries - PUC	MT	***	***	85-95%
(d) Total Sales	MT	***	100%	100%

Sales Quantity - PUC (APRIL Group)	MT	Total	Share of Sales in Percentage	Range
(a) Domestic Sales – PUC	MT	***	***	10-20%
(b) Export Sales - India – PUC	MT	***	***	0-10%
(c) Export Sales - Other Countries - PUC	MT	***	***	85-95%
(d) Total Sales	MT	***	100%	100%

It is seen that the exports to other countries by the producers in Indonesia is in the range of 85-95%. Thus, the producers are highly export oriented. Further, these producers are selling to a number of third countries at a low price."

The findings of Indian and US authorities also confirms that Indonesia has an exportable surplus of product under review that causes a likelihood of dumping from this source.

THAILAND

As per "Thailand: Market for Printing and Writing Paper 2023" (Annexure-G), there is a decline in domestic consumption as well as exports of paper from Thailand recently which indicate that Thailand must have exportable surplus of paper. The extracts of the article are as follows:

PAGE NO

The Thai printing and writing paper market declined markedly to less than \$X in 2022, which is down by 99.9% against the previous year. In general, consumption, however, recorded a notable increase. As a result, consumption attained the peak level of \$X. From 2021 to 2022, the growth of the market failed to regain momentum.

In value terms, printing and writing paper production declined dramatically to less than \$X in 2022 estimated in export price. In general, production, however, enjoyed a slight expansion. The growth pace was the most rapid in 2020 with an increase of 20%. As a result, production attained the peak level of \$X. From 2021 to 2022, production growth failed to regain momentum.

Exports from Thailand:

In 2022, approx. X tons of printing and writing paper were exported from Thailand; picking up by 13% against 2021. In general, exports continue to indicate a relatively flat trend pattern. The most prominent rate of growth was recorded in 2016 when exports increased by 20% against the previous year. Over the period under review, the exports reached the peak figure at X tons in 2017; however, from 2018 to 2022, the exports failed to regain momentum. In value terms, printing and writing paper exports soared to \$X in 2022. Overall, exports, however, showed a relatively flat trend pattern. The exports peaked at \$X in 2019; however, from 2020 to 2022, the exports stood at a somewhat lower figure.

PAGE NO

The above pieces of information strongly indicate that Thailand's exportable surplus is increasing and pose a serious threat of recurrence of dumping into Pakistan and consequent injury to the domestic industry.

5.2 Please provide information reasonably available on the following:

- i. Disposable or an imminent/substantial increase in production capacity of the product subject to anti-dumping duty by the exporting/foreign producer.

In the instant case, the countries involved in dumping as per original investigation has huge installed capacities of the investigated product not only for domestic consumption but also meant for export purposes. In addition, they have further increased their capacities and few expansions are also in the planning stage. The evidences of increased capacities are provided below:

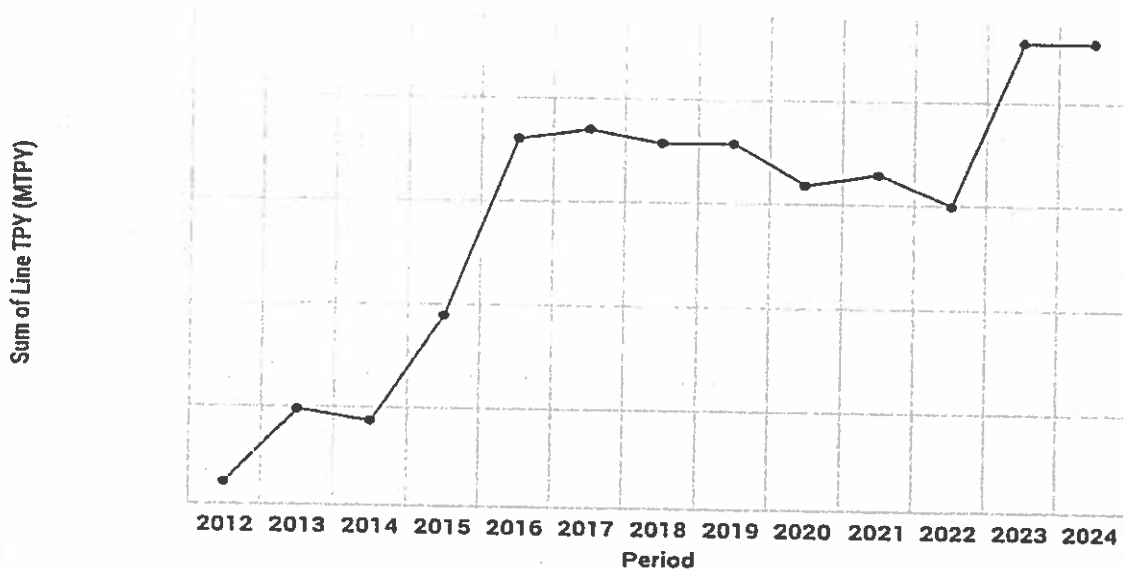
Indonesia:

As per "Pulp & Paper Market Spotlight: Indonesia" by Fisher International (Annexure-H) dated Oct 03, 2022:

"When looking at Indonesia's capacity trend over the last several years, it's interesting to note the significant increase in capacity that occurred from 2014-2016 before it began to gradually decrease from 2017-present. In fact, Indonesia is expected to end 2022 with the lowest capacity since 2015. However, according to

our data from Fisher Solve, production capacity is then expected to redirect its growth in 2023 with an anticipated 8% increase”

Pulp & Paper Capacity in Indonesia (Actual and Announced 2012-2024)



Source: FisherSolve

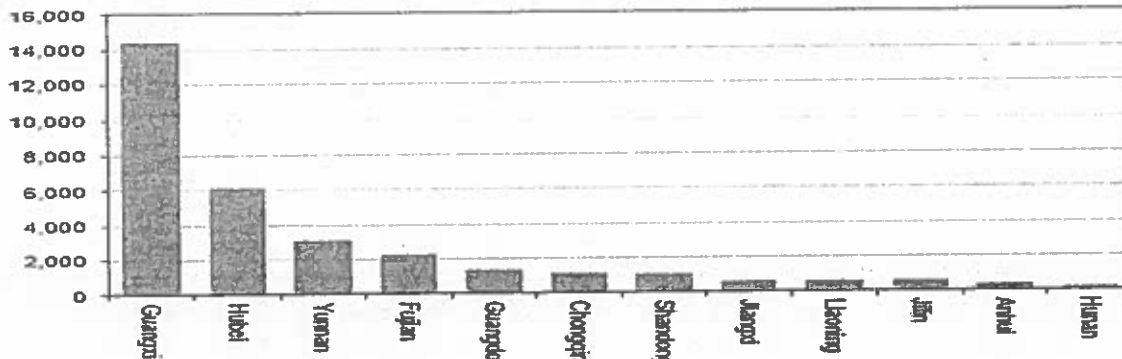
China:

As per Fast markets (Annexure-I) dated September 16, 2021

“Over the last few years, many pulp and paper companies have unveiled aggressive expansion plans to invest in new wood pulp capacity in China. Our tracking shows 30 wood pulp projects with more than 30 million tons of capacity announced between January 2019 and July 2021. More than 60% of the announced capacity is concentrated in the Guangxi Zhuang Autonomous Region and Hubei Province.

PAGE NO

Figure 1
Chinese wood pulp expansion announced between
January 2019 and July 2021
Thousand tonnes



Note: Not all projects have firm commitments, including approval, financing, site acquisition and equipment contracts.

The increasing capacity of wood pulp will also increase the capacities of Paper in China and China is also investing in the capacities of writing and printing paper. Further, as per article "Sun paper: it plans to invest 20 billion yuan in the construction of Forest Pulp paper integration and supporting industrial park project" (Annexure-J) dated Feb 27, 2022:

"Sun paper announced that on February 26, the company signed the strategic cooperation framework agreement with Nanning Municipal People's Government of Guangxi Zhuang Autonomous Region, which agreed that sun paper would invest in the construction of the "Forest Pulp paper integration and supporting industrial park project with an annual output of 5.25 million tons" in Nanning, with a total investment of about 20 billion yuan."

Brazil:

As per Article, "Suzano to build new pulp mill with 2.3 million t capacity in Brazil"

(Attached as Annexure-K) dated 19 May 2021 states that:

"Brazilian paper and pulp group Suzano will build a new pulp mill in Brazil with the world's largest fiber line and a capacity of 2.3 million t of eucalyptus"

PAR 17 2021

pulp. Production is scheduled to start in the first quarter of 2024, the company announced in mid-May."

As per Article, "Klabin starts up first paper machine of Puma II Project"
(Attached as Annexure-L) dated August 30, 2021

"Brazil's largest producer and exporter of paper for packaging and paper packaging, Klabin takes another important step in its growth strategy with the startup of the first paper machine (MP27) of the Puma II Project located in Ortigueira, Paraná, which is its largest investment to date.

The Puma II Project is the result of a R\$12.9 billion investment made by Klabin to build two new paper machines, by 2023, with integrated pulp production"

- ii. Inventories of the product subject to anti-dumping duty by the exporter/importer.

From the foregoing analysis, it is evident that the producers in the subject exporting country have increased and are planning to increase their manufacturing capacities after imposition of antidumping duties on exporting country. In the situation of low growth in demand as discussed above, the expanded production capacities will create sufficient exportable surplus, which is an indication of likelihood of continuation or recurrence of dumping of the product under review, if antidumping duties imposed on dumped imports of certain paper from the exporting country are removed.

Indian investigating authority – Directorate General of Trade Remedies noted in their final findings of "Sunset Review anti-dumping investigation

PAGE 44

concerning imports of "Uncoated Copier Paper" originating in or exported from Indonesia and Singapore" (Annexure-F) that:

"The aggregate information with regard to inventories held by participating producers from Indonesia is given below

<i>Inventories</i>	<i>Unit</i>	<i>Total</i>	<i>Range</i>
<i>April Group</i>	<i>MT</i>	<i>***</i>	<i>10,000-20,000</i>
<i>APP Group</i>	<i>MT</i>	<i>***</i>	<i>90,000-100,000</i>

The inventory level is significant. The inventory level alone is 22% of the total Indian demand. "

- iii. Anti-dumping/countervailing measures taken by other countries on the product subject to anti-dumping duty.

As per the below information, it is noted that trade remedial measures have been imposed on the product under review from dumped sources by other countries as well. This shows that the producers in the subject countries have been dumping goods in other countries and causing injury to the domestic industry of such countries, It also indicates that these markets (US, Australia, India and Mexico) remain restricted for producers in dumped sources, thus, making the possibility of diversion of their surplus capacities to Pakistan market even greater in the event of cessation of duties. Below is the detail of antidumping measures imposed by other countries on dumped

sources:

PAGE NO

- a. On 3rd March 2022, India has continued the antidumping duty on imports of uncoated copier paper from Indonesia in an expiry review during 2022. (Annexure-M)
- b. On 30th March 2022, Australia has also enhanced the antidumping duty in a review of change of circumstance on imports of A4 copy paper from Brazil, China, Indonesia and Thailand. (Annexure-N)
- c. On February 09, 2022, US has also extended antidumping duties on uncoated paper from Australia, Brazil, China, Indonesia, and Portugal. (Annexure-O)
- d. On 25 March 2019, the Mexican authorities extended the definitive duty imposed on imports of certain bond paper from Brazil following the conclusion of sunset review. (Annexure-P)

The export restraints from the export destinations and increasing capacities will force the exporters in the exporting countries to dump their product in other markets. Therefore, removal of antidumping duty would be devastating for the domestic industry since exporting countries will continue to increase their market share in Pakistan by offering lower prices which is going to severely deteriorate competition in the domestic market. Domestic industry will surely not be able to withstand such intense unfair competition and will therefore be driven away from the domestic market and its survival would be at stake.

PAGE NO

- iv. Details of the quantities and values of the product subject to anti-dumping duty exported by each exporter (separately if possible) for the most recent three years.

Attached as Appendix-I.

- v. Indicate the ex-factory export prices of each exporter for the product subject to anti-dumping duty.

Ex-factory prices for imports from the dumping sources from whom dumped imports are still coming are given below:-

(Table-24)

Country Name	Weighted Average Ex-factory price (US\$/MT)
Brazil	100.00
China	108.28
Indonesia	136.93
Japan	103.36
Thailand	148.89

Note:

- i. Evidence of Ocean Freight is attached as Annexure-Q.
- ii. Weighted Average Ex-factory price of Brazil has been indexed as 100 and the remaining figures have been indexed accordingly.

- vi. Explain in detail any known relationship between importer and exporter or any other interested parties.

The Applicant does not know about any relationship between importer and exporter or any other interested party.

5.3 Any additional comment regarding your response to the questions including your efforts to determine any information that is not readily available.

No Comments.

PAGE NO

CONCLUSION

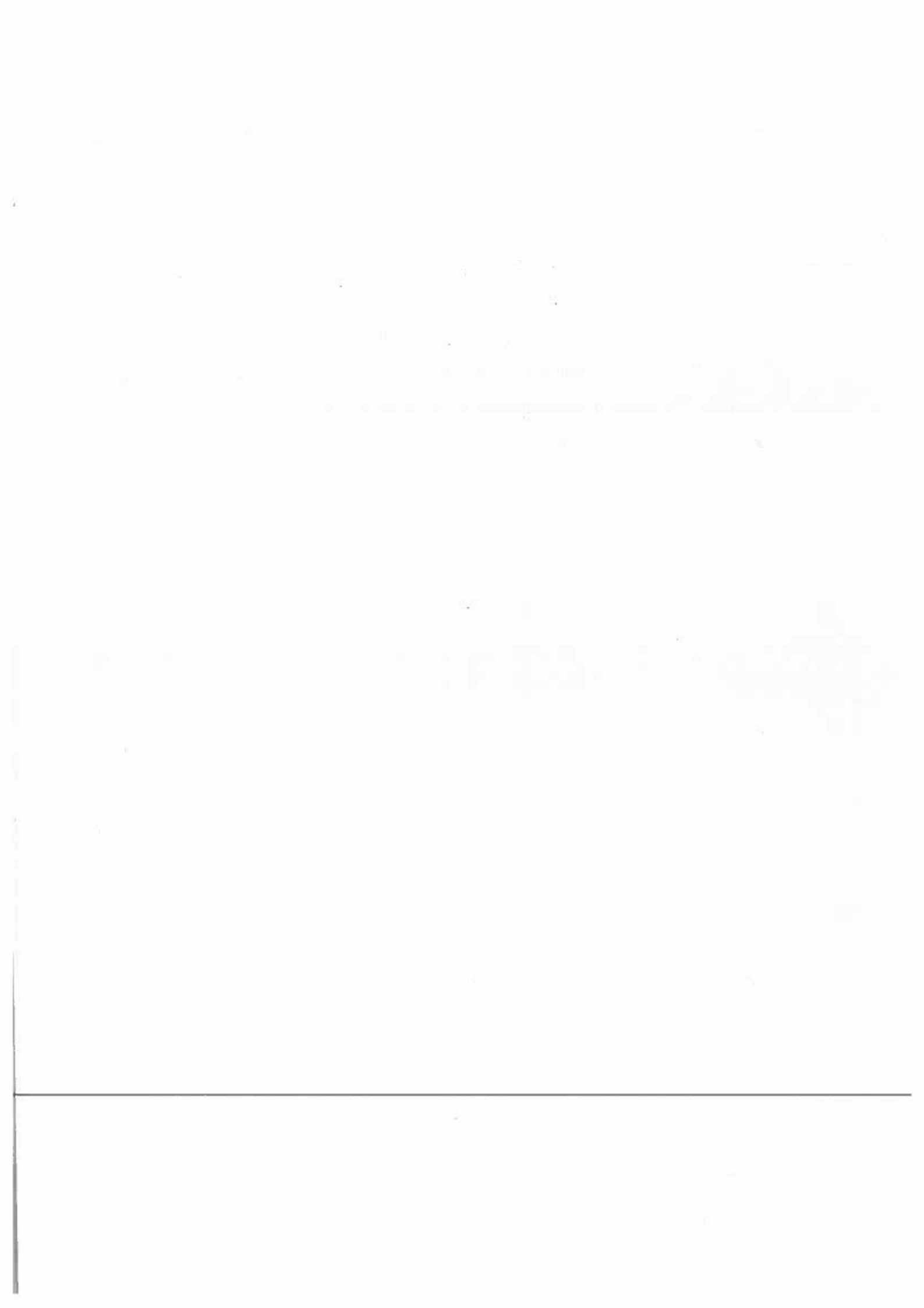
- i) The levy of antidumping duties would have been beneficial provided that the duties would have levied for the entire period of last five years. But actually the duties were not in force for most of the period in the last five years. Therefore, no significance of such antidumping duties can be seen on the operations of the domestic industry during the POR. Infact, production, sales and market share of domestic industry has reduced during the POR (except for the last year of POR) as compared to original POI. On the other hand, the volume of dumped imports has maintained its presence during the last year of POR over the same period.
- ii) If levied continuously, these duties would have been resulted in increased landed cost of dumped imports, reduced volume of dumped imports, increased production, capacity utilization, increased sales, better profitability, healthy cash flows, better return on investment, more employment etc.
- iii) Domestic industry had a little improvement in its profits, but that was due to the exchange rate depreciation and higher freight cost due to which landed cost of imports increased giving a cushion to domestic industry to increase its price in accordance with increase in its cost to make and sell.

In case antidumping duties are removed, dumped imports will continue in the domestic market in huge volumes challenging the survival of the domestic industry and will offer more severe and unfair competition to the domestic industry. Therefore, to save the domestic industry from likely injury, there is a need for continuation of antidumping duties already in force.

PAGE NO

P R A Y E R

Based upon the evidences of likelihood of continuation or recurrence of dumping, the Commission is requested to save the domestic industry from devastating adverse effect of continuation or recurrence of dumping and consequent injury. Therefore, the present antidumping duties levied against dumped imports from Brazil, China, Indonesia, Japan and Thailand, may kindly be continued for a further period of five years.



Appendices

PAGE NO

אשר יבא אל הארץ אשר אנכי נשבע לאבותי לאמר

אני נתתי את הארץ הזאת לכם

אשר יבא אל הארץ אשר אנכי נשבע לאבותי לאמר

אני נתתי את הארץ הזאת לכם

אשר יבא אל הארץ אשר אנכי נשבע לאבותי לאמר

אני נתתי את הארץ הזאת לכם

אשר יבא אל הארץ אשר אנכי נשבע לאבותי לאמר

אני נתתי את הארץ הזאת לכם

אשר יבא אל הארץ אשר אנכי נשבע לאבותי לאמר

אני נתתי את הארץ הזאת לכם

DETAILS OF IMPORTS OF THE PRODUCT SUBJECT TO ANTI-DUMPING DUTY
CERTAIN UNCOATED WRITING /PRINTING PAPER

APPENDIX-I
NON_CONFIDENTIAL

Period (Last three years)	Total Imports from all sources		Imports from Dumping Sources	
	Source (specify country name)	Quantity (MT)	Source (specify country name)	Quantity (MT)
2020	TOTAL	100.00	TOTAL	76.74
	Dumped Sources	76.74	Dumped Sources	76.74
	Other Sources	23.26		
	TOTAL	116.92	TOTAL	93.02
2021	Dumped Sources	93.02	Dumped Sources	93.02
	Other Sources	23.90		
	TOTAL	125.52	TOTAL	120.14
2022	Dumped Sources	120.14	Dumped Sources	120.14
	Other Sources	5.37		
	TOTAL	125.51	TOTAL	120.14

Note:

- i. Total Volume of imports of the product under consideration during Jan-Dec 2020 has been indexed as 100 and respective figures are indexed accordingly.
- ii. Information in the above table is provided to the Commission in confidence under Section 31(2) of the Act. Disclosure of information on imports may lead to the disclosure of information which is by nature confidential information under Section 31(3) of the Act. For a meaningful analysis non-confidential summary is provided in the above table in pursuance of Section 31(5) of the Act.

PAGE NO

**EFFECT OF DUMPED & NON-DUMPED IMPORTS ON SHARE OF LOCAL INDUSTRY IN THE DOMESTIC MARKET
CERTAIN UNCOATED WRITING/PRINTING PAPER**

YEAR	Quarter	Share of local Industry in the Domestic Market	INDEXED			Total Domestic Market
			Share of imports In Domestic Market from Dumped Sources	Share of imports In Domestic Market from Other Sources		
JAN-DEC 2020	Jan-Mar 20	10	15	3	28	
		34 %	54 %	12 %	100 %	
	Apr-Jun 20	3	13	3	20	
		18 %	66 %	16 %	100 %	
	Jul-Sep 20	5	10	5	20	
		27 %	51 %	22 %	100 %	
	Oct-Dec 20	7	19	6	32	
		21 %	59 %	20 %	100 %	
	Total	25	57	17	100	
	25 %	57.47 %	17 %	100 %		
JAN-DEC 2021	Jan-Mar 21	9	22	5	37	
		25 %	61 %	14 %	100 %	
	Apr-Jun 21	5	16	5	26	
		21 %	61 %	18 %	100 %	
	Jul-Sep 21	6	13	4	23	
		25 %	55 %	19 %	100 %	
	Oct-Dec 21	9	18	4	31	
		29 %	59 %	12 %	100 %	
	Total	29	70	18	117	
	25 %	60 %	15 %	100 %		
JAN-DEC 2022	Jan-Mar 22	6	21	2	30	
		20 %	72 %	8 %	100 %	
	Apr-Jun 22	6	25	1	33	
		19 %	78 %	3 %	100 %	
	Jul-Sep 22	7	19	0	27	
		28 %	71 %	1 %	100 %	
	Oct-Dec 22	10	24	0	34	
		29 %	70 %	1 %	100 %	
	Total	29	90	4	123	
	24 %	73 %	3 %	100 %		

Note:

I. Total Domestic Market of the product under consideration for the year Jan-Dec 2020 has been indexed as 100.

II. Information in the above table is provided in confidence under Section 31(2) of the Act. Information on sales of the domestic industry is by nature confidential information under Section 31(3) of the Act and its disclosure could have significant competitive advantage to the competitors and significantly adverse effect on the Applicant. Disclosure of information on imports may lead to the disclosure of information which is by nature confidential information under Section 31(3) of the Act. For a meaningful analysis non-confidential summary is provided in the above table in pursuance of Section 31(5) of the Act.

CHANGE IN INVENTORY - CERTAIN UNCOATED WRITING/PRINTING PAPER

(QTY - INDEXED)

Quarter/Period	Opening Inventory (Qty)	Production (Qty)	Sales (Qty)		Internal Consumption (Qty)	Closing Inventory	Change in Inventory
			Domestic	Export			
JAN-DEC 2020	14.13	100.00	88.83	-	-	25.30	11.17
JAN-DEC 2021	25.30	87.01	103.86	-	-	8.45	(16.84)
JAN-DEC 2022	8.45	103.48	104.26	-	-	7.67	(0.78)

Note:

i Domestic production of the Applicant domestic industry for the year Jan-Dec 2020 has been indexed as 100.

ii Information in the above table is provided to the Commission in confidence under Section 31(2)(a) of the Act. Information on inventories is by nature confidential information under Section 31(3) of the Act and its disclosure could have significant competitive advantage to the competitors or could have significantly adverse effect on the Applicant. However, for a meaningful analysis non confidential summary is provided in the above table in pursuance of Section 31(5) of the Act.

LANDED COST - (DUMPED & NON-DUMPED)
EFFECT ON PRICES ON QUARTERLY BASIS (CERTAIN UNCOATED WRITING/PRINTING PAPER)

Quarter	Average Cost of Domestic Production (Rs./MT)	Average sales price of Domestic Product (Rs./MT)	Weighted Average C & F price (Rs./MT)		Weighted Average Landed Cost (Rs./MT)			Average Exchange Rate of Currency US\$/Rs.
			For Dumped Imports	For Non-Dumped Imports	For Dumped Imports (Including AD Duty)	For Dumped Imports (Without AD Duty)	For Non-Dumped Imports	
JAN-DEC 2020	86.83	100.00	73.20	65.26	103.27	95.21	87.22	US\$ 1=Rs. 161.51
JAN-DEC 2021	97.04	110.47	78.40	69.79	114.77	103.94	93.55	US\$ 1=Rs. 162.91
JAN-DEC 2022	138.48	165.20	111.81	85.67	184.31	168.63	139.30	US\$ 1=Rs. 206.82

Note:

- Average Sales Price of Domestic Product for the year Jan-Dec 2020 has been indexed as 100
- Information on prices and costs of domestic like product has been provided to the Commission in confidence under Section 31(2)(a) of the Act since their disclosure could have significantly adverse effect on the Applicants. Information on landed cost of imports is submitted to the Commission in confidence since such information may lead to the disclosure of by nature confidential information. For reasonable understanding of the substance of information provided in the above table, non-confidential summary compliant with Section 31(6) of the Act has been provided.

Appendix-V

(Information in Appendix-V regarding costs, sales, inventories, income, profit, loss or expenditure relating to the product concerned is by nature confidential information in terms of Section 31(3)(c) of the Act. Its disclosure could be of significant competitive advantage to the competitors hence submitted to the Commission in confidence.

Non-confidential version of Appendix-V will disclose the business sensitive information of the company which will cause conflict of interest between the exporters, importers and other interested parties. Hence it is not susceptible to summarization.

Appendix-VI
Non Confidential

INSTALLED CAPACITY AND QUANTITY PRODUCED

Name of the industrial unit: BULLEH SHAH PACKAGING PVT. LTD

INDEXED

Period	Installed Capacity	Total Production
Jan-Dec 2020	100.00	93.08
Jan-Dec 2021	100.00	96.43
Jan-Dec 2022	100.00	97.24

Note:

- i) Installed capacity of the Applicant domestic industry for the first twelve months of POR i.e Jan-Dec 2020 has been indexed as 100.
- ii) Information in the above table is provided to the Commission in confidence under Section 31(2)(a) of the Act. Disclosure of information on production statistics may lead to disclosure of information on inventories which is by nature confidential information under Section 31(3) of the Act and its disclosure could have significant competitive advantage to the competitors or could have significantly adverse effect on the Applicant. However, for a meaningful analysis non confidential summary is provided in the above table in pursuance of Section 31(5) of the Act.

Annexure-A

(Financial Statements)

PAGE NO

ANNEXURE A

FINANCIAL STATEMENTS

BULLEH SHAH PACKAGING PRIVATE LIMITED (the applicant domestic industry) is a non-listed company which is not required to circulate its financial statements by way of provision to stock exchange or on the company website. Information concerning financial condition of the company which is not publicly available is by nature confidential information under Section 31 of the Act and therefore, financial statements of Bulleh Shah Packaging is provided to the Commission in confidence under Section 31(3) of the Act.

PAGE NO

Annexure-B

PAGE NO

Calculation of Ocean Freight Per MT & Adjusted Ex-Factory Export Prices from EXPORTING COUNTRIES

Annexure-B

NON_CONFIDENTIAL

1 Calculation of Ocean Freight Rates

Country	Port	Ocean Freight Per MT
BRAZIL	Santos	46.51
CHINA	Shanghai	23.30
INDONESIA	Jakarta	20.46
JAPAN	Tokyo	23.77
THAILAND	Laem Chabang	13.95

Note: Ocean Freight Evidence per MT is obtained from following link: <https://moverdb.com/container-shipping/pakistan/>

2 Calculation of Adjusted Ex-Factory Export Price

EXPORTER NAME	W.A C&F Prices	Ocean Freight per MT	Insurance 0.09% /MT	Handling Charges Internal Freight at FOB Level (1%)	Adjusted Ex-Factory Export Price
BRAZIL	148.12	46.51	0.13	1.48	100.00
CHINA	166.14	23.30	0.15	1.66	141.03
INDONESIA	182.52	20.46	0.16	1.83	160.06
JAPAN	150.01	23.77	0.14	1.50	124.60
THAILAND	199.99	13.95	0.18	2.00	183.86

3 Dumping Margin Calculation

Country Name	Normal Value (US\$/MT)	C&R Export Price (US\$/MT)	Ex-Factory (Adjusted) Export Price	Dumping Margin in		
				Absolute terms	%age on ex-factory basis	%age on C&F Basis
BRAZIL	210.79	148.12	100.00	110.79	110.79%	74.80%
CHINA	212.00	166.14	141.03	70.97	50.32%	42.72%
INDONESIA	193.79	182.52	160.06	33.73	21.07%	18.48%
JAPAN	202.55	150.01	124.60	77.94	62.55%	51.96%
THAILAND	200.49	199.99	183.86	16.64	9.05%	8.32%

Note: Weighted Average Ex-factory (adjusted) export price of Brazil has been indexed as 100 and the remaining values have been indexed accordingly. Information on prices of imports has been provided to the Commission in confidence under Section 31(2)(c) of the Act since their disclosure may lead to the disclosure of by nature confidential information of the Applicants falling under Section 31(3) of the Act. For reasonable understanding of the substance of information provided in the above table, non-confidential summary compliant with Section 31(5) of the Act has been provided.

Page No

Annexure-C

PAGE NO

Brazil: Market for Printing and Writing Paper 2022

Market Size for Printing and Writing Paper in Brazil

In 2021, the Brazilian printing and writing paper market increased by X% to \$X for the first time since 2018, thus ending a two-year declining trend. Overall, consumption, however, showed a perceptible setback. Printing and writing paper consumption peaked at \$X in 2012; however, from 2013 to 2021, consumption remained at a lower figure.

Production of Printing and Writing Paper in Brazil

In value terms, printing and writing paper production rose markedly to \$X in 2021 estimated in export price. Overall, production, however, showed a mild setback. The most prominent rate of growth was recorded in 2018 when the production volume increased by X% against the previous year. Over the period under review, production attained the maximum level at \$X in 2012; however, from 2013 to 2021, production stood at a somewhat lower figure.

Exports of Printing and Writing Paper

Exports from Brazil

In 2021, exports of printing and writing paper from Brazil reached X tons, remaining stable against 2020. In general, exports, however, saw a mild descent. The pace of growth was the most pronounced in 2019 when exports increased by X% against the previous year. As a result, the exports reached the peak of X tons. From 2020 to 2021, the growth of the exports remained at a somewhat lower figure. In value terms, printing and writing paper exports shrank modestly to \$X in 2021. Overall, exports, however, recorded a pronounced reduction. The growth pace was the most rapid in 2019 when exports increased by X%. The exports peaked at \$X in 2013; however, from 2014 to 2021, the exports failed to regain momentum.

Exports by Country

The United States (X tons), Argentina (X tons) and Peru (X tons) were the main destinations of printing and writing paper exports from Brazil, together accounting for X% of total exports. Chile, Mexico, China, the UK, Singapore, Paraguay, Colombia, South Africa, Italy and Ecuador lagged somewhat behind, together accounting for a further X 2012 to 2021, the biggest increases were in South Africa (with a CAGR of +X%), while shipments for the other leaders experienced more modest paces of growth. In value terms, the largest markets for printing and writing paper exported from Brazil were Argentina (\$X), the United States (\$X) and Peru (\$X), together comprising X% of total exports. These countries were followed by Chile, Mexico, China, the UK, Singapore, Paraguay, Colombia, South Africa, Ecuador and Italy, which together accounted for a further X Africa, with a CAGR of +X%, recorded the highest rates of growth with regard to the value of exports, in terms of the main countries of destination over the period under review, while shipments for the other leaders experienced more modest paces of growth.

Export Prices by Country

In 2021, the average printing and writing paper export price amounted to \$X per ton, with a decrease of -X% against the previous year. Overall, the export price recorded a slight descent. The growth pace was the most rapid in 2018 when the average export price increased by X%. Over the period under review, the average export prices reached the maximum at \$X per ton in 2014; however, from 2015 to 2021, the export prices failed to regain momentum. There were significant differences in the average prices for the major export markets. In 2021, the country with the highest price was Argentina (\$X per ton), while the average price for exports to the United States (\$X per ton) was amongst the lowest. From 2012 to 2021, the most notable rate of growth in terms of prices was recorded for supplies to Chile (-X%), while the prices for the other major destinations experienced a decline.

Imports of Printing and Writing Paper

Imports into Brazil

In 2021, approx. X tons of printing and writing paper were imported into Brazil; remaining constant against the previous year. In general, imports faced a abrupt slump. The most prominent rate of growth was recorded in 2017 when imports increased by X%. Imports peaked at X tons in 2012; however, from 2013 to 2021, imports stood at a somewhat lower figure. In value terms, printing and writing paper imports rose to \$X in 2021. Over the period under review, imports recorded a abrupt downturn. The growth pace was the most rapid in 2017 with an increase of X%. Over the period under review, imports reached the maximum at \$X in 2012; however, from 2013 to 2021, imports remained at a lower figure.

Imports by Country Sweden

(X tons), China (X tons) and Germany (X tons) were the main suppliers of printing and writing paper imports to Brazil, with a combined X% share of total imports. Finland, Austria, Colombia and Italy lagged somewhat behind, together accounting for a further X. From 2012 to 2021, the biggest increases were in Colombia (with a CAGR of +X%), while purchases for the other leaders experienced mixed trend patterns. In value terms, the largest printing and writing paper suppliers to Brazil were Sweden (\$X), China (\$X) and Germany (\$X), with a combined X% share of total imports. These countries were followed by Finland, Austria, Italy and Colombia, which together accounted for a further X. The main suppliers, Colombia, with a CAGR of +X%, saw the highest rates of growth with regard to the value of imports, over the period under review, while purchases for the other leaders experienced mixed trend patterns.

Import Prices by Country

The average printing and writing paper import price stood at \$X per ton in 2021, picking up by X% against the previous year. In general, the import price, however, showed a relatively flat trend pattern. The most prominent rate of growth was recorded in 2018 when the average import price increased by X% against the previous year. The import price peaked at \$X per ton in 2012; however, from 2013 to 2021, import prices remained at a lower figure. Prices varied noticeably countryorigin: the country with the highest price was China (\$X per ton), while the price for Colombia (\$X per ton) was amongst the lowest. From 2012 to 2021, the most notable rate of growth in terms of prices was attained by

China (+X%), while the prices for the other major suppliers experienced more modest paces of growth.

Source: <https://www.indexbox.io/store/brazil-printing-and-writing-paper-market-report-analysis-and-forecast-to-2020/>

1000 1000

Annexure-D

PAGE 110

Section 1: Introduction

Section 2: Methodology

Section 3: Results

Section 4: Discussion

Section 5: Conclusion

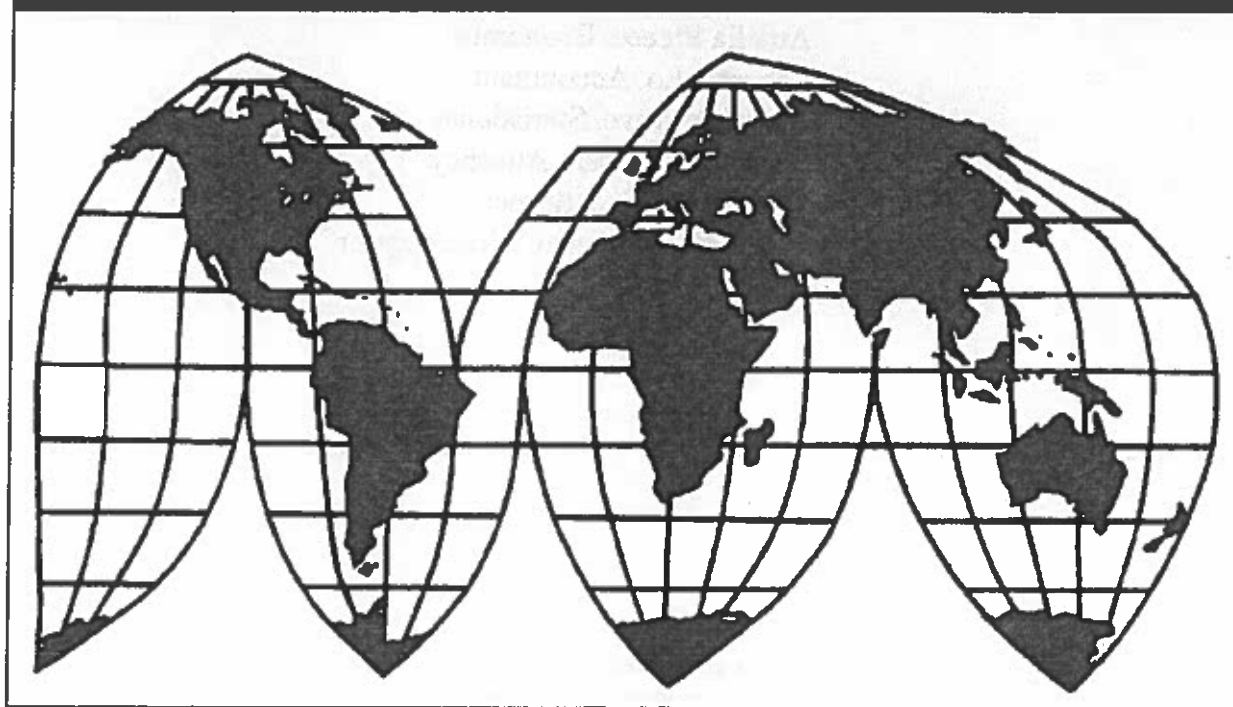
Uncoated Paper from Australia, Brazil, China, Indonesia, and Portugal

Investigation Nos. 701-TA-528-529 and 731-TA-1264-1268 (Review)

Publication 5275

January 2022

U.S. International Trade Commission



Washington, DC 20436

PAGE 10

U.S. International Trade Commission

COMMISSIONERS

Jason E. Kearns, Chair
Randolph J. Stayin, Vice Chair
David S. Johanson
Rhonda K. Schmidlein
Amy A. Karpel

Catherine DeFilippo
Director of Operations

Staff assigned

Calvin Chang, Investigator
Caitlyn Hendricks, Investigator
Robert Ireland, Industry Analyst
Amelia Preece, Economist
Joanna Lo, Accountant
Conor Hargrove, Statistician
Kelsey Christensen, Attorney
Brian Soiset, Attorney
Elizabeth Haines, Supervisory Investigator

Address all communications to
Secretary to the Commission

United States International Trade Commission
Washington, DC 20436

PAGE 10

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-528-529 and 731-TA-1264-1268 (Review)

Uncoated Paper from Australia, Brazil, China, Indonesia, and Portugal

DETERMINATIONS

On the basis of the record¹ developed in the subject five-year reviews, the United States International Trade Commission ("Commission") determines, pursuant to the Tariff Act of 1930 ("the Act"), that revocation of the countervailing duty orders on uncoated paper from China and Indonesia and the antidumping duty orders on uncoated paper from Australia, Brazil, China, Indonesia, and Portugal would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

BACKGROUND

The Commission instituted these reviews on February 1, 2021 (86 FR 7734) and determined on May 7, 2021, that it would conduct full reviews (86 FR 27650, May 21, 2021). Notice of the scheduling of the Commission's reviews and of a public hearing to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* on July 23, 2021 (86 FR 39057). The Commission conducted its hearing on November 18, 2021. All persons who requested the opportunity were permitted to participate.

¹ The record is defined in § 207.2(f) of the Commission's Rules of Practice and Procedure (19 CFR 207.2(f)).

PAGE NO

Views of the Commission

Based on the record in these five-year reviews, we determine under section 751(c) of the Tariff Act of 1930, as amended (“the Tariff Act”), that revocation of the countervailing duty orders on uncoated paper from China and Indonesia and the antidumping duty orders on uncoated paper from Australia, Brazil, China, Indonesia, and Portugal would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

I. Background

On January 21, 2015, the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union (“USW”); Domtar Corporation (“Domtar”); Finch Paper LLC (“Finch Paper”); P.H. Glatfelter Company (“Glatfelter”); and Packaging Corporation of America (“PCA”) filed petitions in the original investigations. In February 2016, the Commission determined that an industry in the United States was materially injured by reason of subsidized imports of uncoated paper from China and Indonesia and by reason of less-than-fair-value (“LTFV”) imports of uncoated paper from Australia, Brazil, China, Indonesia, and Portugal. On March 3, 2016, the Department of Commerce (“Commerce”) issued countervailing duty orders on subject imports from China and Indonesia and antidumping duty orders on subject imports from Australia, Brazil, China, Indonesia, and Portugal.¹

The Commission instituted these first five-year reviews on February 1, 2021.² The Commission received a joint response to its notice of institution from five domestic interested parties: Domtar, Finch Paper, North Pacific Paper Company (“NORPAC”), and PCA, which are domestic producers of uncoated paper; and the USW, which is a trade union representing workers at uncoated paper production facilities (collectively, “Domestic Interested Parties”).³

¹ Confidential Report, Memorandum INV-TT-136 (“CR”) and Public Report (“PR”) at I-2-3; *Certain Uncoated Paper From Australia, Brazil, Indonesia, the People’s Republic of China, and Portugal: Amended Final Affirmative Antidumping Determinations for Brazil and Indonesia and Antidumping Duty Orders*, 81 Fed. Reg. 11174 (Mar. 3, 2016); and *Certain Uncoated Paper From Indonesia and the People’s Republic of China: Amended Final Affirmative Countervailing Duty Determination and Countervailing Duty Order (Indonesia) and Countervailing Duty Order (People’s Republic of China)*, 81 Fed. Reg. 11187 (Mar. 3, 2016).

² *Certain Uncoated Paper From Australia, Brazil, China, Indonesia, and Portugal: Institution of Five-Year Reviews*, 86 Fed. Reg. 7734 (Feb. 1, 2021).

³ See Domestic Interested Parties’ Prehearing Br., EDIS Doc. 756104 (Nov. 8, 2021); Domestic Interested Parties’ Posthearing Br., EDIS Doc. 757551 (Nov. 30, 2021).

PAGE NO. 3

The Commission also received responses to its notice of institution from the following respondent interested parties: Indonesian producers and exporters PT. Pabrik Kerta Tjiwi Kimia Tbk, PT. Pindo Deli Pulp and Paper Mills, and PT. Indah Kiat Pulp and Paper Tbk. (collectively, "APP"); Australian producer and exporter Paper Australia Pty Ltd and its wholly owned subsidiary, Paper Products Marketing (USA) Inc. (collectively, "Australian Paper"); Portuguese producer and exporter The Navigator Company S.A. and U.S. importer and Navigator North America, Inc. (collectively, "Navigator"); and Brazilian producers and exporters International Paper do Brasil Ltda. and International Paper Exportadora Ltda. (collectively, "IP") and Suzano S.A. ("Suzano"). The Commission found that the domestic interested party group response to its notice of institution was adequate. The Commission also found that the respondent interested party group responses for which there was participation were adequate.⁴ In light of these findings, the Commission determined to conduct full reviews with respect to the countervailing duty orders on uncoated paper from China and Indonesia and antidumping duty orders on uncoated paper from Australia, Brazil, China, Indonesia, and Portugal.⁵

The Commission received joint prehearing and posthearing briefs from the Domestic Interested Parties, as well as final comments. The Domestic Interested Parties also appeared at the hearing represented by counsel.⁶

The Commission also received prehearing and posthearing briefs from Indonesian producers and exporters APP,⁷ Australian producer and exporter and U.S. importer Australian Paper,⁸ and Portuguese producer and exporter and U.S. importer Navigator.⁹ APP, Australian Paper, and Navigator appeared at the hearing represented by counsel. Australian Paper and Navigator also filed final comments.

⁴ The Commission did not receive a response to the notice of institution from any respondent interested party with respect to the antidumping and countervailing duty orders on uncoated paper from China, and determined that the respondent interested party group response was inadequate with respect to those orders. Nonetheless, the Commission determined to conduct full reviews with respect to the orders on uncoated paper from China in light of its determination to conduct full reviews of the orders on uncoated paper from Australia, Brazil, Indonesia, and Portugal.

⁵ *Certain Uncoated Paper From Australia, Brazil, China, Indonesia, and Portugal: Notice of Commission Determination to Conduct Full Five-Year Reviews*, 86 Fed. Reg. 27650 (May 21, 2021).

⁶ In light of the restrictions on access to the Commission building due to the COVID-19 pandemic, the Commission conducted the hearing through written witness testimony and video conference, as set forth in procedures provided to the parties and announced on its website.

⁷ See APP Prehearing Br., EDIS Doc. 756073 (Nov. 8, 2021); APP Posthearing Br., EDIS Doc. 757484 (Nov. 30, 2021).

⁸ See Australian Paper Prehearing Br., EDIS Doc. 756081 (Nov. 8, 2021); Australian Paper Posthearing Br., EDIS Doc. 757845 (Nov. 30, 2021).

⁹ See Navigator Prehearing Br., EDIS Doc. 756130 (Nov. 8, 2021); Navigator Posthearing Br., EDIS Doc. 757526 (Nov. 30, 2021).

U.S. industry data are based on the questionnaire responses of eight U.S. producers of uncoated paper that are believed to account for the vast majority of domestic production of uncoated paper in 2020.¹⁰ U.S. import data and related information are based on Commerce's official import statistics and the questionnaire responses of 17 U.S. importers of uncoated paper that accounted for *** percent of subject imports from Brazil and *** percent of subject U.S. imports from Portugal in 2020.¹¹ *** responding U.S. importer certified that there were no subject imports from Australia in 2020.¹² Responding U.S. importers reported no subject imports from China or Indonesia in 2020.¹³ Foreign industry data and related information are based on the questionnaire responses of one producer and exporter of uncoated paper in Australia, accounting for approximately *** percent of uncoated paper production in Australia in 2020;¹⁴ questionnaire responses from two producers and exporters of uncoated paper in Brazil, accounting for approximately *** percent of uncoated paper production in Brazil in 2020;¹⁵ a joint questionnaire response from three producers and exporters of uncoated paper in Indonesia, accounting for approximately *** percent of uncoated paper production in Indonesia in 2020;¹⁶ and a questionnaire response from one producer and exporter of uncoated paper in Portugal, accounting for approximately *** percent of uncoated paper production in Portugal.¹⁷ The Commission received no questionnaire responses from any producer or exporter of uncoated paper in China.¹⁸

¹⁰ CR/PR at III-1.

¹¹ CR/PR at IV-1. The coverage percentage of imports from Portugal is *** percent because *** CR/PR at IV-1 n.5.

¹² CR/PR at IV-1 n.3. *** reported subject imports from Australia only in 2015, accounting for *** percent of imports from Australia that year. Official Commerce statistics indicated that there was one short ton imported from Australia to the United States in 2020. *Id.*

¹³ CR/PR at IV-1. Responding firms *** from China in 2015, accounting for *** percent of imports from China that year. Responding firms *** from Indonesia in 2015 and 2018, accounting for *** and *** percent of imports, respectively. Official Commerce statistics indicate that there were 189 short tons of imports from Indonesia in 2020. CR/PR at IV-1 n.4.

¹⁴ CR/PR at IV-28, CR/PR at Table IV-9. The firm reported *** exports of uncoated paper to the United States in 2020. *Id.*

¹⁵ CR/PR at IV-41. Subject imports from Brazil accounted for *** percent of U.S. uncoated paper imports in 2020. Table IV-1.

¹⁶ CR/PR at IV-60. Subject imports from Indonesia accounted for *** percent of U.S. uncoated paper imports in 2020. CR/PR at Table IV-1.

¹⁷ CR/PR at IV-74. Subject imports from Portugal accounted for *** percent of U.S. imports of uncoated paper in 2020. CR/PR at Table IV-1.

¹⁸ CR/PR at IV-55, Tables IV-1 Source and IV-20.

II. Domestic Like Product and Industry

A. Domestic Like Product

In making its determination under section 751(c) of the Tariff Act, the Commission defines the "domestic like product" and the "industry."¹⁹ The Tariff Act defines "domestic like product" as "a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation under this subtitle."²⁰ The Commission's practice in five-year reviews is to examine the domestic like product definition from the original investigation and consider whether the record indicates any reason to revisit the prior findings.²¹

Commerce has defined the imported merchandise within the scope of the orders under review as follows:

The scope of these orders includes uncoated paper in sheet form; weighing at least 40 grams per square meter but not more than 150 grams per square meter; that either is a white paper with a GE brightness level 3 of 85 or higher or is a colored paper; whether or not surface-decorated, printed (except as described below), embossed, perforated, or punched; irrespective of the smoothness of the surface; and irrespective of dimensions (Certain Uncoated Paper).

Certain Uncoated Paper includes (a) uncoated free sheet paper that meets this scope definition; (b) uncoated ground wood paper produced from bleached chemi-thermo-mechanical pulp (BCTMP) that meets this scope definition; and (c) any other uncoated paper that meets this scope definition regardless of the type of pulp used to produce the paper.

¹⁹ 19 U.S.C. § 1677(4)(A).

²⁰ 19 U.S.C. § 1677(10); see, e.g., *Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Department of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int'l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int'l Trade 1996); *Torrington Co. v. United States*, 747 F. Supp. 744, 748-49 (Ct. Int'l Trade 1990), *aff'd*, 938 F.2d 1278 (Fed. Cir. 1991); see also S. Rep. No. 249, 96th Cong., 1st Sess. 90-91 (1979).

²¹ See, e.g., *Internal Combustion Industrial Forklift Trucks from Japan*, Inv. No. 731-TA-377 (Second Review), USITC Pub. 3831 at 8-9 (Dec. 2005); *Crawfish Tail Meat from China*, Inv. No. 731-TA-752 (Review), USITC Pub. 3614 at 4 (July 2003); *Steel Concrete Reinforcing Bar from Turkey*, Inv. No. 731-TA-745 (Review), USITC Pub. 3577 at 4 (Feb. 2003).

Specifically excluded from the scope are (1) paper printed with final content of printed text or graphics and (2) lined paper products, typically school supplies, composed of paper that incorporates straight horizontal and/or vertical lines that would make the paper unsuitable for copying or printing purposes. For purposes of this scope definition, paper shall be considered “printed with final content” where at least one side of the sheet has printed text and/or graphics that cover at least five percent of the surface area of the entire sheet.²²

The scope has not changed substantively since the original investigations. Since imposition of the orders, Commerce conducted two anti-circumvention inquiries. In November 2016, Commerce initiated an inquiry to determine whether imports of uncoated paper with a GE brightness of 83 ±1% (“83 bright paper”) was altered in form or appearance in minor respects such that it should be considered subject to the orders. It issued an affirmative determination in September 2017, and imports of 83 bright paper from subject countries were therefore included within the scope of the orders.²³ In October 2019, Commerce initiated anti-circumvention inquiries on whether imports of sheet rolls that are converted into uncoated paper sheets within the United States were circumventing the countervailing duty orders on uncoated paper from China and Indonesia and the antidumping duty orders on uncoated paper from Australia, Brazil, China, and Indonesia.²⁴ Commerce issued affirmative final determinations of circumvention in December 2021 regarding the antidumping and countervailing duty orders on China, the antidumping duty order on Brazil, and the

²² *Certain Uncoated Paper from Indonesia: Final Results of the Expedited First Five-Year Sunset Review of the Countervailing Duty Order*, 86 Fed. Reg. 29243 (June 1, 2021); *Uncoated Paper from Australia, Brazil, the People’s Republic of China, Indonesia, and Portugal, Final Results of the Expedited First Sunset Reviews of the Antidumping Duty Orders*, 86 Fed. Reg. 29248 (June 1, 2021); *Certain Uncoated Paper from the People’s Republic of China: Final Results of the Expedited Five-Year Sunset Review of the Countervailing Duty Order*, 86 Fed. Reg. 30260 (June 7, 2021).

²³ *Certain Uncoated Paper from Australia, Brazil, the People’s Republic of China, Indonesia, and Portugal: Affirmative Final Determination of Circumvention of the Antidumping and Countervailing Duty Orders*, 82 Fed. Reg. 41610 (Sept. 1, 2017) (“2017 Circumvention Determination”).

²⁴ *Certain Uncoated Paper Products from Australia, Brazil, the People’s Republic of China, and Indonesia: Initiation of Anti-Circumvention Inquiry of Antidumping and Countervailing Duty Orders*, 84 Fed. Reg. 55915 (Oct. 18, 2019). The antidumping duty order of uncoated paper from Portugal was not included in the circumvention inquiry.

antidumping and countervailing duty orders on Indonesia.²⁵ Commerce has not otherwise issued any scope rulings concerning these orders since the original investigations.

Uncoated paper subject to these reviews consists of paper in finished sheets, weighing between 40-150 grams per square meter, and that is white with a GE brightness level of 85²⁶ or higher or that is colored, and irrespective of surface finish, decoration, or dimensions. Uncoated paper is commonly used for office copy and printing paper, books, instruction manuals, inserts, business forms, flyers, maps, and brochures.²⁷ Uncoated paper may be sold to office superstores (such as Staples and Office Depot), club stores (such as Costco, Sam's Club, and BJ's), retailers (such as Walmart, Kroger, Walgreen's, Best Buy, CVS, and Target), paper merchants/distributors, and end users (such as commercial printers, schools, and offices).²⁸

In the original investigations, the Commission defined a single domestic like product consisting of certain uncoated paper that is coextensive with Commerce's scope.²⁹ The Commission found that all uncoated paper described in Commerce's scope shared the same physical characteristics and uses, were made in common manufacturing facilities using the same production processes and employees, were generally interchangeable, were sold in the same channels of distribution, and shared the same customer and producer perceptions.³⁰

In the current reviews, no party contests the definition of the domestic like product from the original investigations.³¹ The record in these reviews indicates that the characteristics

²⁵ *Certain Uncoated Paper from Brazil, the People's Republic of China, and Indonesia: Affirmative Final Determinations of Circumvention of the Antidumping and Countervailing Duty Orders for Certain Uncoated Paper Rolls*, 86 Fed. Reg. 71025 (Dec. 14, 2021) ("2021 Circumvention Determination"). Commerce published a negative preliminary determination of circumvention regarding the antidumping duty order on Australia in January 2021, and it has extended its deadline for the final determination until September 2022. *Certain Uncoated Paper from Australia: Negative Preliminary Determination of Circumvention of the Antidumping Duty Order for Uncoated Paper Rolls*, 86 Fed. Reg. 7256 (Jan. 27, 2021).

²⁶ Commerce, however, determined that subject imports that otherwise match the description of the scope but are white and with a GE brightness of 83 were subject to the orders pursuant to its circumvention determination. *2017 Circumvention Determination*, 82 Fed. Reg. 41610.

²⁷ CR/PR at I-22.

²⁸ CR/PR at I-22 & I-30.

²⁹ *Certain Uncoated Paper from Australia, Brazil, China, Indonesia, and Portugal*, Inv. Nos. 701-TA-528-529 and 731-TA-1264-1268 (Final), USITC Pub. 4592 ("Original Determinations") at 6-7.

³⁰ *Original Determinations*, USITC Pub. 4592 at 6-7; see also *Preliminary Determinations*, USITC Pub. 4522 at 7-10. In the original investigations, no respondent party addressed the definition of the domestic like product.

³¹ Domestic Interested Parties indicated in their response to the notice of institution that they did not contest the definition of domestic like product from the original investigations, and they have not otherwise addressed the definition in their subsequent arguments. Domestic Interested Parties

(Continued...)

and uses of domestically produced uncoated paper have not changed since the original investigations so as to warrant revisiting the definition.³² In light of this, and absent any argument to the contrary, we define a single domestic like product consisting of all uncoated paper, coextensive with Commerce's scope definition.

B. Domestic Industry

Section 771(4)(A) of the Tariff Act defines the relevant industry as the domestic "producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."³³ In defining the domestic industry, the Commission's general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

1. Sufficient Production-Related Activities

In deciding whether a firm qualifies as a domestic producer of the domestic like product, the Commission generally analyzes the overall nature of a firm's U.S. production-related activities, although production-related activity at minimum levels could be insufficient to constitute domestic production.³⁴

In the original investigations, the Commission considered whether independent converters performed sufficient production-related activities to be considered domestic

Response to Institution Notice at 24. Similarly, respondent interested parties indicated that they did not challenge the definition of the domestic like product from the original investigations for purposes of the institution phase, and they have not otherwise addressed the definition of the domestic like product in subsequent arguments. See APP Response to Institution Notice at 8; Australian Paper Response to Institution Notice at 16; Navigator Response to Institution Notice at 26; IPEX Response to Institution Notice at 11.

³² See CR/PR at I-21-26.

³³ 19 U.S.C. § 1677(4)(A). The definitions in 19 U.S.C. § 1677 are applicable to the entire subtitle containing the antidumping and countervailing duty laws, including 19 U.S.C. §§ 1675 and 1675a. See 19 U.S.C. § 1677.

³⁴ The Commission generally considers six factors: (1) source and extent of the firm's capital investment; (2) technical expertise involved in U.S. production activities; (3) value added to the product in the United States; (4) employment levels; (5) quantity and type of parts sourced in the United States; and (6) any other costs and activities in the United States directly leading to production of the like product. No single factor is determinative and the Commission may consider any other factors it deems relevant in light of the specific facts of any investigation. *Crystalline Silica Photovoltaic Cells and Modules from China*, Inv. Nos. 701-TA-481 and 731-TA-1190 (Final), USITC Pub. 4360 at 12-13 (Nov. 2012).

producers. At that time, more than 95 percent of domestically produced uncoated paper was sold as sheeted papers by producers, and the remainder was sold to converters for specialty cut-size products.³⁵ The Commission found that the operations of independent converters (or sheeters) were relatively small, compared to the operations of integrated firms.³⁶ It also found that independent converters' capital expenditures and number of production and related workers were modest.³⁷ There was limited information on the record to indicate the level of technical expertise required for conversion operations, although the Commission noted that conversion appeared to be a relatively simple process.³⁸ The principal input used in the conversion of uncoated paper was sheeter rolls, the vast majority of which appeared to have been sourced domestically.³⁹ The Commission found that the toll conversion of sheeter rolls provided substantial value added, ranging from *** to *** percent.⁴⁰ Based on the substantial value added to sheeter rolls by converters and the lack of any argument to the contrary, the Commission found that converters engaged in sufficient production-related activities to qualify as domestic producers.⁴¹

While the record on the production-related activities of independent converters is limited in these reviews, it is consistent with that of the original investigations. One converter provided a questionnaire response in these reviews, ***, and it reported that conversion ***.⁴² Further, this firm reported that it employed between *** production related workers from 2015 to 2020, and that it ***.⁴³ Finally, there is no information on the record indicating that the value added by sheeting has changed since the original investigations.⁴⁴ Based on these factors

³⁵ *Original Determinations*, USITC Pub. 4592 at 7-8.

³⁶ *Original Determinations*, USITC Pub. 4592 at 8.

³⁷ *Original Determinations*, USITC Pub. 4592 at 8.

³⁸ *Original Determinations*, USITC Pub. 4592 at 8.

³⁹ *Original Determinations*, USITC Pub. 4592 at 8.

⁴⁰ Confidential *Original Determinations*, EDIS Doc. 574985 at 11; *Original Determinations*, USITC Pub. 4592 at 8.

⁴¹ *Original Determinations*, USITC Pub. 4592 at 8.

⁴² U.S. Producer Questionnaire, EDIS Doc. *** at question II-4.

⁴³ U.S. Producer Questionnaire, EDIS Doc. *** at questions II-8 & II-10 (***)

⁴⁴ In the original investigations, the value added by converters was calculated based upon their tolling operations. Confidential *Original Determinations*, EDIS Doc. 574985 at 11; *Original Determinations*, USITC Pub. 4592 at 8. *** which is insufficient for purposes of calculating the value added by these tolling operations. CR/PR at III-12 n.20. As calculated by the annual total conversion costs divided by annual total COGS reported over the POR, *** value added for its conversion of purchased sheeter rolls into uncoated paper ranged between *** and *** percent over the POR. *Calculated from* U.S. Producer Questionnaire, EDIS Doc. *** at III-9a. This is similar to the ratio of total conversion costs divided by total COGS for converters in the original investigations, which ranged

(Continued...)

and the absence of any information or argument suggesting that the production-related activities of independent converters have changed since the original investigations, we find that converters engage in sufficient production-related activities to qualify as domestic producers.

2. Related Parties

We must determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to section 771(4)(B) of the Tariff Act. This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers.⁴⁵ Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.⁴⁶

In the original investigations, the Commission defined the domestic industry to include all U.S. producers of uncoated paper, including independent converters.⁴⁷ The Commission found that two domestic producers qualified for possible exclusion under the related parties provision. The Commission found that International Paper was a related party because ***, and that *** was a related party because it directly imported subject merchandise during the POI. Finding that both firms' primary interest was in domestic production, the Commission

from *** to *** percent over the POI. *Calculated from U.S. Producer Questionnaire, EDIS Doc. *** at III-9a.*

⁴⁵ See *Torrington Co v. United States*, 790 F. Supp. 1161, 1168 (Ct. Int'l Trade 1992), *aff'd without opinion*, 991 F.2d 809 (Fed. Cir. 1993); *Sandvik AB v. United States*, 721 F. Supp. 1322, 1331-32 (Ct. Int'l Trade 1989), *aff'd mem.*, 904 F.2d 46 (Fed. Cir. 1990); *Empire Plow Co. v. United States*, 675 F. Supp. 1348, 1352 (Ct. Int'l Trade 1987).

⁴⁶ The primary factors the Commission has examined in deciding whether appropriate circumstances exist to exclude a related party include the following:

- (1) the percentage of domestic production attributable to the importing producer;
- (2) the reason the U.S. producer has decided to import the product subject to investigation (whether the firm benefits from the LTFV sales or subsidies or whether the firm must import in order to enable it to continue production and compete in the U.S. market);
- (3) whether inclusion or exclusion of the related party will skew the data for the rest of the industry;

- (4) the ratio of import shipments to U.S. production for the imported product; and
- (5) whether the primary interest of the importing producer lies in domestic production or importation. *Changzhou Trina Solar Energy Co. v. USITC*, 100 F. Supp.3d 1314, 1326-31 (Ct. Int'l Trade 2015); see also *Torrington Co. v. United States*, 790 F. Supp. at 1168.

⁴⁷ *Original Determinations*, USITC Pub. 4592 at 10.

concluded that appropriate circumstances did not exist to exclude either firm from the domestic industry pursuant to 19 U.S.C. § 1677(4)(B).⁴⁸

In the current reviews, no party has addressed the definition of domestic industry.^{49 50} A single producer, ***, qualifies for possible exclusion under the related parties provision because ***,⁵¹ ***, which ***, was responsible for *** percent of reported U.S. production in 2020 and was the *** largest domestic producer.⁵² It did not directly import or purchase subject merchandise during the POR,⁵³ and *** exports to the United States were ***.⁵⁴ In view of this information, *** primary interest is in domestic production rather than importation. Accordingly, we find that appropriate circumstances do not exist for its exclusion from the domestic industry.

We therefore define the domestic industry as all U.S. producers of uncoated paper, including independent converters.

III. Cumulation

A. Legal Standard

With respect to five-year reviews, section 752(a) of the Tariff Act provides as follows:

the Commission may cumulatively assess the volume and effect of imports of the subject merchandise from all countries with respect to which reviews under

⁴⁸ Confidential Original Determinations at 13-14; *Original Determinations*, USITC Pub. 4592 at 9-10.

⁴⁹ While Commerce determined in December 2021 that imports of sheeter rolls from Brazil, China and Indonesia that U.S. converters cut into uncoated paper in the United States were circumventing the pertinent orders, the only converter providing a questionnaire response in these reviews, ***, certified that ***. See U.S. Importer Questionnaire, EDIS Doc. ***; see also ***.

⁵⁰ At the hearing, a representative of Navigator first informed the Commission that domestic producer Domtar would be acquired by Paper Excellence this year, and it asserted that Paper Excellence controls uncoated paper producers in China and Indonesia, including APP. Hearing Transcript ("Hearing Tr."), EDIS Doc. 756979 (Nov. 18, 2021) at 154 (Redondo). Domtar has clarified that Karta Halten B.V., an affiliate of Paper Excellence, acquired Domtar in a transaction that closed after the period of review, on November 30, 2021. Domestic Interested Parties Posthearing Br. at Exhibit 2; CR/PR at Table III-1. Domtar has indicated that this transaction will not allow APP to control it, and that ***. Domestic Interested Parties Posthearing Br. at Exhibit 2.

⁵¹ CR/PR at Table I-16; see also Foreign Producer Questionnaire, EDIS Doc. *** at II-11. ***.

⁵² CR/PR at Tables I-15 & III-4.

⁵³ CR/PR at Table III-9.

⁵⁴ ***. Foreign Producer Questionnaire, EDIS Doc. *** at II-9 & II-11.

section 1675(b) or (c) of this title were initiated on the same day, if such imports would be likely to compete with each other and with domestic like products in the United States market. The Commission shall not cumulatively assess the volume and effects of imports of the subject merchandise in a case in which it determines that such imports are likely to have no discernible adverse impact on the domestic industry.⁵⁵

Cumulation therefore is discretionary in five-year reviews, unlike original investigations, which are governed by section 771(7)(G)(i) of the Tariff Act.⁵⁶ The Commission may exercise its discretion to cumulate, however, only if the reviews are initiated on the same day, the Commission determines that the subject imports are likely to compete with each other and the domestic like product in the U.S. market, and imports from each such subject country are not likely to have no discernible adverse impact on the domestic industry in the event of revocation. Our focus in five-year reviews is not only on present conditions of competition, but also on likely conditions of competition in the reasonably foreseeable future.

In the original investigations, the Commission found that there was a reasonable overlap of competition between and among subject imports and the domestic like product, notwithstanding respondents' contrary arguments.⁵⁷ With respect to fungibility, the Commission found that market participants' general perceptions of interchangeability, comparability, and ability to meet quality specifications established that any difference in quality or environmental certifications alleged by respondents were not of sufficient magnitude to support a finding that the products were not fungible.⁵⁸ The Commission also found that there was a reasonable overlap of channels of distribution, that U.S. producers and importers of subject uncoated paper reported selling to all regions of the contiguous United States, and that uncoated paper from all sources was simultaneously present in the U.S. market to a sufficient

⁵⁵ 19 U.S.C. § 1675a(a)(7).

⁵⁶ 19 U.S.C. § 1677(7)(G)(i); *see also, e.g., Nucor Corp. v. United States*, 601 F.3d 1291, 1293 (Fed. Cir. 2010) (Commission may reasonably consider likely differing conditions of competition in deciding whether to cumulate subject imports in five-year reviews); *Allegheny Ludlum Corp. v. United States*, 475 F. Supp. 2d 1370, 1378 (Ct. Int'l Trade 2006) (recognizing the wide latitude the Commission has in selecting the types of factors it considers relevant in deciding whether to exercise discretion to cumulate subject imports in five-year reviews); *Nucor Corp. v. United States*, 569 F. Supp. 2d 1328, 1337-38 (Ct. Int'l Trade 2008).

⁵⁷ *Original Determinations*, USITC Pub. 4592 at 11.

⁵⁸ *Original Determinations*, USITC Pub. 4592 at 13.

degree.⁵⁹ Accordingly, the Commission cumulated subject imports from Australia, Brazil, China, Indonesia, and Portugal for purposes of its material injury analysis.⁶⁰

In these reviews, the statutory threshold for cumulation is satisfied because all reviews were initiated on the same day: February 1, 2021.⁶¹ In addition, we consider the following issues in deciding whether to exercise our discretion to cumulate the subject imports: (1) whether imports from any of the subject countries are precluded from cumulation because they are likely to have no discernible adverse impact on the domestic industry; (2) whether there is a likelihood of a reasonable overlap of competition among subject imports from the subject countries and the domestic like product; and (3) whether subject imports are likely to compete in the U.S. market under different conditions of competition.

B. Likelihood of No Discernible Adverse Impact

The statute precludes cumulation if the Commission finds that subject imports from a country are likely to have no discernible adverse impact on the domestic industry.⁶² Neither the statute nor the Uruguay Round Agreements Act ("URAA") Statement of Administrative Action ("SAA") provides specific guidance on what factors the Commission is to consider in determining that imports "are likely to have no discernible adverse impact" on the domestic industry.⁶³ With respect to this provision, the Commission generally considers the likely volume of subject imports and the likely impact of those imports on the domestic industry within a reasonably foreseeable time if the orders are revoked. Our analysis for each of the subject countries takes into account, among other things, the nature of the product and the behavior of subject imports in the original investigations. We consider the data pertinent to each subject country below.

Australia. In the original investigations, subject imports from Australia increased from *** short tons in 2012 (U.S. importers' U.S. shipments of such imports accounted for *** percent of apparent U.S. consumption) to *** short tons in 2013 (U.S. importers' U.S. shipments of such imports accounted for *** percent of apparent U.S. consumption) and *** short tons in 2014 (U.S. importers' U.S. shipments of such imports accounted for *** percent of apparent U.S. consumption).⁶⁴ Australian Paper, which accounted for all known production of

⁵⁹ *Original Determinations*, USITC Pub. 4592 at 13-14.

⁶⁰ *Original Determinations*, USITC Pub. 4592 at 11-14.

⁶¹ CR/PR at Table I-1.

⁶² 19 U.S.C. § 1675a(a)(7).

⁶³ SAA, H.R. Rep. No. 103-316, vol. I at 887 (1994).

⁶⁴ *Confidential Staff Report from Original Investigations*, EDIS Doc. 573166 at Tables IV-4, IV-11; *Original Determinations*, USITC Pub. 4592 at Tables IV-4, IV-11.

uncoated paper in Australia in 2014, responded to the Commission's questionnaire in the original investigations.⁶⁵ The United States was the largest export market for uncoated paper from Australia during the original investigations.⁶⁶

In the current reviews, Australian Paper continues to account for all production of uncoated paper in Australia.⁶⁷ The reported quantity of subject imports from Australia was *** short tons in 2015, accounting for *** percent of apparent U.S. consumption; no responding importer reported importing uncoated paper from Australia after 2015.⁶⁸ Australian Paper's capacity remained relatively steady throughout the period of review ("POR"), increasing by *** percent from *** short tons in 2015 to *** short tons in 2020, although its capacity was *** percentage points lower in interim 2021 (at *** short tons) than in interim 2020 (at *** short tons).⁶⁹ Australian Paper's production initially increased from 2015 to 2019, then decreased sharply by *** percent from 2019 to 2020, ending the period *** percent lower in 2020 than in 2015.⁷⁰ Consequently, Australian Paper's capacity utilization decreased from *** percent in 2015 to *** percent in 2020.⁷¹ Capacity utilization was *** percentage points lower in interim 2021, at *** percent, than interim 2020, at *** percent.⁷²

The quantity of Australian Paper's exports of uncoated paper fluctuated during the period of review, decreasing from its period-high of *** short tons (or *** percent of total shipments) in 2015 to a period-low of *** short tons (or *** percent of total shipments) in 2019 before increasing at the end of the POR to *** short tons (or *** percent of total shipments) in 2020.⁷³ ***.⁷⁴ The top export markets for uncoated paper and paperboard (a

⁶⁵ CR/PR at IV-28; *Original Determinations*, USITC Pub. 4592 at 32 n.171.

⁶⁶ Confidential Staff Report from Original Investigations at Table VII-3; *Original Determinations*, USITC Pub. 4592 at Table VII-3.

⁶⁷ CR/PR at IV-28.

⁶⁸ CR/PR at Table IV-1. According to official Commerce statistics, one short ton was imported from Australia in 2020. CR/PR at IV-1 n.3.

⁶⁹ CR/PR at IV-29, Table IV-11. Throughout these reviews, capacity data were collected based on the paper sheeting equipment rather than the papermaking capacity because the scope includes only sheeted paper. *Id.* at II-4. With respect to papermaking capacity, the record establishes that papermaking equipment cannot be turned on and off without incurring significant costs and risking damage to the equipment, and thus uncoated paper producers seek to maximize utilization of papermaking capacity. *See id.*; Hearing Tr. at 28 (Melton), 204 (Redondo). Both papermaking capacity and sheeting equipment may be used to produce products other than the subject uncoated paper. CR/PR at II-4.

⁷⁰ CR/PR at IV-29.

⁷¹ CR/PR at IV-30, Table IV-11.

⁷² CR/PR at IV-30, Table IV-11.

⁷³ CR/PR at Table IV-11.

⁷⁴ CR/PR at IV-30.

category which includes in-scope and out-of-scope merchandise) from Australia in 2020 were New Zealand, Germany, and Chile.⁷⁵

Subject imports from Australia undersold the domestic like product in 14 of 15 quarterly comparisons during the original investigations, and in all seven quarterly comparisons in the current reviews.⁷⁶

We are unpersuaded by Australian Paper's argument that subject imports from Australia are likely to have no discernible adverse impact if the order were revoked. Specifically, Australian Paper asserts that it has been uniquely focused on its home market rather than exports, particularly given Australia's imposition of orders on imports from China, Brazil, Indonesia, and Thailand in 2017 and on imports from Finland, Korea, Russia, and Slovakia in 2019.⁷⁷ Australian Paper further argues that its supply agreements with home market customers for A3 and A4 paper, which cannot be substituted for the 8.5 x 11 inch paper required in the United States, make it unlikely that it would redirect its supply to the U.S. market after revocation.⁷⁸ In addition, it states that it recently secured a two-year supply agreement with ***, a large purchaser in Australia. However, Australian Paper's substantial and increasing excess capacity indicates that it could increase its exports to the United States without reducing its shipments of A3 and A4 paper to home market customers.⁷⁹ Indeed, in 2020 Australian Paper increased its exports of uncoated paper to Chile and Mexico, which use 8.5 x 11 inch paper.⁸⁰ Moreover, at the hearing, an Australian Paper official stated that the new supply agreement with *** for A3 and A4 paper would only account for approximately five percent of Australian Paper's production, still leaving excess capacity with which it could supply the U.S. market with increasing volumes of uncoated paper.⁸¹

Other factors would also provide an incentive for the Australian industry to increase its exports to the United States after revocation, notwithstanding its commitments to home

⁷⁵ CR/PR at Table IV-13.

⁷⁶ CR/PR at V-17, V-17 n.20, and Table V-7. U.S. importers reported U.S. shipments of subject imports from Australia through the third quarter of 2016 although Australian Paper reported no exports of subject merchandise after 2015.

⁷⁷ Australian Paper Posthearing Br. at 3.

⁷⁸ Australian Paper Posthearing Br. at 5, 10.

⁷⁹ CR/PR at Table IV-11.

⁸⁰ See CR/PR at II-5 n.8; CR/PR at Table IV-13. In 2018, Australia reported no exports of uncoated paper to the United States, Chile, or Mexico. CR/PR at Table IV-13.

⁸¹ See Hearing Tr. at 197 (Leith). In its posthearing brief, Australian Paper claimed that under the agreement, it would supply *** with approximately *** short tons of paper each year, representing over *** percent of Australian Paper's current sheeting capacity. The supply agreement attached to Australian Paper's posthearing brief, however, does not contain any terms regarding the quantity of product to be supplied. Australian Paper's Posthearing Br. at 12, Exhibit 1.

market customers. Australian Paper has experienced poor financial performance since 2015, and claimed before the Australian Anti-Dumping Commission that declining demand in the Australian paper market had forced it to seek out alternative (export) markets in an effort to maintain production levels.⁸² Consistent with this evidence, Australia's export shipments increased in 2020 compared to the levels in 2017, 2018, and 2019, in both absolute terms and as a share of total shipments, and remained elevated in interim 2021.⁸³ Furthermore, Australian Paper still controls the U.S. subsidiary (PPM-USA) that it used prior to the orders to import its uncoated paper product, and the record indicates that PPM-USA sold domestically produced paper under an Australian Paper brand in the U.S. market during the POR.⁸⁴

We are also unpersuaded by Australian Paper's argument that subject imports from Australia are likely to have no discernible adverse impact on the U.S. market if the order were revoked because such imports would likely focus on underserved regions of the United States and because increased freight costs make underselling impossible.⁸⁵ Contrary to this argument, the record shows that when subject imports from Australia were in the U.S. market they served all regions of the market, as did the domestic industry.⁸⁶ Furthermore, a NORPAC official stated at the hearing that revocation of the order on Australia would likely result in an increase in subject imports from Australia to injurious levels in the West Coast market served by NORPAC, given the history of imports from Australian Paper targeting the West Coast and Australian Paper's larger production capacity relative to NORPAC's domestic production.⁸⁷

Nor would the relatively high freight costs prevailing towards the end of the POR likely preclude underselling by subject imports from Australia after revocation. While we recognize that freight costs were elevated in 2021, the record contains evidence that freight costs began

⁸² See Domestic Interested Parties' Prehearing Br. at Exhibit 13. The Australian Anti-Dumping Commission stated that "as these alternative markets attract prices that are lower than the Australian market, these export sales are currently also not profitable." *Id.* It also noted that the average annual size of the Australian market from 2016 to 2020 was down 25 percent compared to the average size of the market in the four-year period ending in 2015. *Id.*

⁸³ CR/PR at Tables IV-11 & IV-12. Australian Paper contends that it views New Zealand as part of its home market. Australian Paper Prehearing Br. at 8. Nonetheless, a substantial portion of its exports went to markets other than New Zealand. See Australian Paper Posthearing Br. at 6; CR/PR at Table IV-11.

⁸⁴ See Australian Paper's Response to Notice of Institution at 13; Australian Paper Posthearing Br. at 7.

⁸⁵ Australian Paper Prehearing Br. at 11-13.

⁸⁶ *Original Determinations*, USITC Pub. 4592 at 14 and Tables II-2, IV-9; Confidential Staff Report from Original Investigations at Tables II-2, IV-9; CR/PR at Table II-2; Hearing Tr. at 105 (Strand), 106 (Rotolo), 106 (LeBlanc).

⁸⁷ See Hearing Tr. at 104-05 (Anneberg); 186 (Leith).

to decline after September 2021 and lacks evidence that freight rates are expected to remain at the level reported in these reviews for the reasonably foreseeable future.⁸⁸ Furthermore, as noted above, subject imports from Australia pervasively undersold the domestic like product during both the original investigation and during the POR, and high freight costs did not prevent the Australian industry from exporting significant and increasing volumes of uncoated paper to the European Union, Middle East, and South/Central America towards the end of the POR.⁸⁹ Relatively high freight costs are also unlikely to deter the Australian industry from increasing its exports of uncoated paper to the U.S. market in light of the higher prices available in the U.S. market relative to third country markets, as recognized by witnesses for both domestic producers and respondents at the hearing.⁹⁰ Contrary to Australian Paper's arguments, the record indicates that Australian Paper has both the ability and incentive to export uncoated paper the United States if the order were revoked.

Based on the foregoing, including the increasing volume of subject imports from Australia during the original investigations, Australian Paper's excess production capacity, the continued existence of a U.S. subsidiary, the increasing importance of exports to the Australian industry, and the underselling of the domestic like product by subject imports from Australia during the original investigations and during the POR, we find that revocation of the antidumping duty order on subject imports from Australia would not likely have no discernible adverse impact on the domestic industry.

Brazil. In the original investigations, subject imports from Brazil increased from *** short tons in 2012 (U.S. importers' U.S. shipments of such imports accounted for *** percent of apparent U.S. consumption) to *** short tons in 2013 (U.S. importers' U.S. shipments of such imports accounted for *** percent of apparent U.S. consumption) and *** short tons in 2014 (U.S. importers' U.S. shipments of such imports accounted for *** percent of apparent U.S. consumption).⁹¹ Two producers of uncoated paper in Brazil, which accounted for *** percent

⁸⁸ See CR/PR at Table V-1; Hearing Tr. at 75 (Byers), 77 (Rotolo). Evidence submitted by the domestic interested parties shows that economists and industry observers were expecting supply chain disruptions and freight costs to abate towards the end of 2021 and into 2022, consistent with the decline in the Baltic Dry Index, a benchmark for the price of moving major raw materials based on 23 shipping routes, after early October 2021. Domestic Interested Parties' Responses to Commissioner Questions at 46-51, Exhibits 15-18.

⁸⁹ CR/PR at Tables IV-12 & IV-13; see also Australian Paper Posthearing Br. at 6, Exhibit 2; Navigator Posthearing Br. at I-23.

⁹⁰ CR/PR at Table IV-34; Hearing Tr. at 212 (Redondo), 213 (Leith), 213 (Gupta), 28 (Melton), and 103 (Strand); Domestic Interested Parties' Posthearing Br. at Exhibit 1 p. 39.

⁹¹ Confidential Staff Report from Original Investigations, EDIS Doc. 573166 at Tables IV-4, IV-11; Original Determinations, USITC Pub. 4592 at Tables IV-4, IV-11.

of production of uncoated paper in Brazil and *** percent of subject imports from Brazil in 2014, responded to the Commission's questionnaire.⁹²

The record indicates that two producers accounted for *** uncoated paper production in Brazil in 2020.⁹³ During the current period of review, the quantity of subject imports from Brazil was *** short tons in 2015 (or *** percent of apparent U.S. consumption), *** short tons in 2016 (or *** percent of apparent U.S. consumption), *** short tons in 2017 (or *** percent of apparent U.S. consumption), *** short tons in 2018 (or *** percent of apparent U.S. consumption), *** short tons in 2019 (or *** percent of apparent U.S. consumption), and *** short tons in 2020 (or *** percent of apparent U.S. consumption).⁹⁴ Subject imports from Brazil were *** percent higher in interim 2021 at *** short tons (or *** percent of apparent U.S. consumption) than interim 2020 at *** short tons (or *** percent of apparent U.S. consumption).⁹⁵

The Brazilian industry's capacity fluctuated but decreased overall by *** percent from *** short tons in 2015 to *** short tons in 2020, with the largest decrease in capacity of *** percent occurring between 2017 and 2018.⁹⁶ The industry's capacity was *** percent lower in interim 2021 than interim 2020.⁹⁷ Capacity utilization increased from *** percent in 2015 to *** percent in 2018 before decreasing to *** percent in 2020, a level *** percentage points lower than in 2015.⁹⁸ Capacity utilization was *** percentage points higher in interim 2021, at *** percent, than interim 2020, at *** percent.⁹⁹ The absolute quantity of exports of uncoated paper from Brazil decreased overall during the period of review, while the ratio of exports to total shipments increased.¹⁰⁰ The quantity of exports from Brazil decreased from *** short tons (or *** percent of total shipments) in 2015 to *** short tons (or *** percent of total shipments) in 2020.¹⁰¹ The United States was the top export market for uncoated paper and paperboard (a category that includes in-scope and out-of-scope merchandise) from Brazil in 2020, accounting for 13.0 percent of such exports, followed by the United Kingdom and Peru.¹⁰²

⁹² CR/PR at IV-41.

⁹³ CR/PR at IV-14.

⁹⁴ CR/PR at Tables IV-1, C-1.

⁹⁵ CR/PR at Tables IV-1, C-1.

⁹⁶ CR/PR at IV-42, Table IV-16. Combined capacity increased *** percent from 2018 to 2019, and was driven primarily by one firm (***). CR/PR at IV-42.

⁹⁷ CR/PR at IV-42.

⁹⁸ CR/PR at IV-43, Table IV-16.

⁹⁹ CR/PR at IV-43, Table IV-16.

¹⁰⁰ CR/PR at Table IV-16.

¹⁰¹ CR/PR at Table IV-16.

¹⁰² CR/PR at Table IV-19.

Exports of uncoated paper from Brazil are subject to antidumping orders in Australia, Mexico, and Pakistan.¹⁰³

Subject imports from Brazil undersold the domestic like product in seven of 30 quarterly comparisons during the original investigations, and in 18 of 26 quarterly comparisons during the period of review.¹⁰⁴

The uncoated paper industry in Brazil is export oriented and has demonstrated a continuing interest in serving the U.S. market. The United States remained an important export market for uncoated paper from Brazil throughout the period of review, despite the disciplining effect of the order, as evidenced by its continued presence in the U.S. market,¹⁰⁵ and Commerce's recent affirmative anticircumvention determination with respect to Brazil further demonstrates Brazil's interest in supplying the U.S. market.¹⁰⁶ Based on the foregoing, including the increasing volume of subject imports from Brazil during the original investigations, the recent increase in such imports in interim 2021 compared to interim 2020, and the Brazilian industry's excess capacity and export orientation throughout the period of review, we find that revocation of the antidumping duty order on subject imports from Brazil would not likely have no discernible adverse impact on the domestic industry.

China. In the original investigations, subject imports from China increased from *** short tons in 2012 (U.S. importers' U.S. shipments of such imports accounted for *** percent of apparent U.S. consumption) to *** short tons in 2013 (U.S. importers' U.S. shipments of such imports accounted for *** percent of apparent U.S. consumption) and *** short tons in 2014 (U.S. importers' U.S. shipments of such imports accounted for *** percent of apparent U.S. consumption).¹⁰⁷ The Commission received questionnaire responses from two firms in China, which accounted for approximately *** percent of production of uncoated paper in China in 2014 and approximately *** percent of uncoated paper exports from China to the United

¹⁰³ CR/PR at II-9.

¹⁰⁴ CR/PR at V-17, V-17 n.20, and Table V-7.

¹⁰⁵ CR/PR at Table IV-17. Producers and exporters of uncoated paper in Brazil also report exporting to a range of other markets. *Id.*

¹⁰⁶ See *Certain Uncoated Paper From Brazil, the People's Republic of China, and Indonesia: Affirmative Final Determinations of Circumvention of the Antidumping Duty Orders and Countervailing Duty Orders for Certain Uncoated Paper Rolls*, 86 Fed. Reg. 71025 (Dec. 14, 2021).

¹⁰⁷ Confidential Staff Report from Original Investigations, EDIS Doc. 573166 at Tables IV-4, IV-11; *Original Determinations*, USITC Pub. 4592 at Tables IV-4, IV-11.

States in 2014.¹⁰⁸ The record indicated that subject producers in China rapidly increased their capacity over the POI.¹⁰⁹

The current reviews contain limited new information concerning the Chinese uncoated paper industry, as no Chinese producer or exporter responded to the Commission's questionnaire.¹¹⁰ The Domestic Interested Parties identified ten firms as possible producers or exporters of uncoated paper in China.¹¹¹ The Domestic Interested Parties also provided evidence that the Chinese industry added at least *** short tons of uncoated paper production capacity over the POR.¹¹² Official Commerce statistics indicate that the quantity of subject imports from China was 36,241 short tons in 2015 (or 0.9 percent of apparent U.S. consumption), 732 short tons in 2016 (or 0.0 percent of apparent U.S. consumption), 604 short tons in 2017 (or 0.0 percent of apparent U.S. consumption), 461 short tons in 2018 (or 0.0 percent of apparent U.S. consumption), 2,462 short tons in 2019 (or 0.1 percent of apparent U.S. consumption), and 1,390 short tons in 2020 (or 0.1 percent of apparent U.S. consumption), for an overall decrease during the period.¹¹³ Subject imports from China were lower in interim 2021 at 58 short tons than interim 2020 at 1,138 short tons (or 0.1 percent of apparent U.S. consumption).¹¹⁴

Information regarding the global paper and paperboard industry, a category which includes in-scope and out-of-scope merchandise, indicates that China is the largest producer of paper and paperboard in the world.¹¹⁵ In 2020, the top export markets for paper and paperboard from China were Japan, Hong Kong, and South Korea.¹¹⁶ The United States was among the smallest export markets for paper and paperboard from China in 2020, although exports of paper and paperboard to the United States were reported during each year of the period of review.¹¹⁷ Commerce reached an affirmative anticircumvention determination concerning imports of certain uncoated paper from China to the United States in December

¹⁰⁸ CR/PR at IV-55.

¹⁰⁹ Confidential Staff Report from Original Investigations, EDIS Doc. 573166 at Table II-4, II-11; *Original Determinations*, USITC Pub. 4592 at Table II-4, II-6.

¹¹⁰ CR/PR at IV-55.

¹¹¹ CR/PR at IV-55.

¹¹² Domestic Interested Parties Prehearing Brief at 45-47 and Exhibit 17.

¹¹³ CR/PR at Table IV-1.

¹¹⁴ CR/PR at Table C-1.

¹¹⁵ See CR/PR at IV-55 and Table IV-20 Note.

¹¹⁶ CR/PR at Table IV-20.

¹¹⁷ See CR/PR at Table IV-20.

2021, indicating that Chinese producers and exporters remain interested in supplying the U.S. market.¹¹⁸

Subject imports from China undersold the domestic like product in 20 of 21 quarterly comparisons during the original investigations, and in one of three quarterly comparisons in these reviews.¹¹⁹

Based on the foregoing, including the increasing volume of subject imports from China during the original investigations, underselling of the domestic like product by subject imports from China during the original investigations and continued underselling during the POR, the large size of the paper and paperboard industry in China including the addition of significant production capacity during the POR, and the substantial volume of uncoated paper and paperboard products exported by producers in China, we find that revocation of the antidumping and countervailing duty orders on subject imports from China would not likely have no discernible adverse impact on the domestic industry.

Indonesia. In the original investigations, subject imports from Indonesia increased from *** short tons in 2012 (U.S. importers' U.S. shipments of such imports accounted for *** percent of apparent U.S. consumption) to *** short tons in 2013 (U.S. importers' U.S. shipments of such imports accounted for *** percent of apparent U.S. consumption) and *** short tons in 2014 (U.S. importers' U.S. shipments of such imports accounted for *** percent of apparent U.S. consumption).¹²⁰ The Commission received a questionnaire response from one firm in Indonesia, which accounted for approximately *** percent of production of uncoated paper in Indonesia in 2014 and approximately *** percent of uncoated paper exports from Indonesia to the United States in 2014.¹²¹

The record indicates that there are currently four producers of uncoated paper in Indonesia.¹²² During the current period of review, the Commission received a joint questionnaire response from three firms in Indonesia, APP, which accounted for approximately *** of uncoated paper production in that country.¹²³ The quantity of subject imports from Indonesia was 148,520 short tons in 2015 (or 3.7 percent of apparent U.S. consumption),

¹¹⁸ See *Certain Uncoated Paper From Brazil, the People's Republic of China, and Indonesia: Affirmative Final Determinations of Circumvention of the Antidumping Duty Orders and Countervailing Duty Orders for Certain Uncoated Paper Rolls*, 86 Fed. Reg. 71025 (Dec. 14, 2021).

¹¹⁹ CR/PR at V-17, V-17 n.20, and Table V-7.

¹²⁰ Confidential Staff Report from Original Investigations, EDIS Doc. 573166 at Table IV-4; *Original Determinations*, USITC Pub. 4592 at Table IV-4.

¹²¹ CR/PR at IV-60.

¹²² CR/PR at IV-60; APP Posthearing Br. at 4-5.

¹²³ CR/PR at IV-60. The fourth subject producer in Indonesia, APRIL, did not submit a questionnaire response.

43,339 short tons in 2016 (or 1.2 percent of apparent U.S. consumption), 15,317 short tons in 2017 (or 0.4 percent of apparent U.S. consumption), 12,280 short tons in 2018 (or 0.3 percent of apparent U.S. consumption), 21,749 short tons in 2019 (or 0.6 percent of apparent U.S. consumption), and 189 short tons in 2020 (or 0.0 percent of apparent U.S. consumption), for an overall decrease during the period.¹²⁴ There were no reported subject imports from Indonesia in interim 2021, compared to 189 short tons (or 0.0 percent of apparent U.S. consumption) of reported subject imports in interim 2020.

Although APP asserts that it has not exported subject merchandise to the United States since 2015, APP only accounted for approximately *** percent of uncoated paper production in Indonesia in 2020,¹²⁵ and official Commerce import statistics and Commerce's administrative reviews of the antidumping duty order on subject imports from Indonesia confirm that subject imports from Indonesia remained in the U.S. market during the POR.¹²⁶ Additionally, an affirmative anticircumvention determination by Commerce in December 2021 further indicates that Indonesian producers and exporters remain interested in supplying the U.S. market.¹²⁷

The Indonesian industry's reported capacity was approximately *** short tons each year from 2015 to 2017 but decreased by *** percent from 2017 to 2020 to *** short tons, ending the period *** percent lower than in 2015.¹²⁸ The industry's capacity was *** percent lower in interim 2021, at *** short tons, than in interim 2020, at *** short tons.¹²⁹ Capacity utilization in Indonesia increased irregularly from *** percent in 2015 to *** percent in 2020, a level *** percentage points higher than in 2015.¹³⁰ Capacity utilization was *** percentage points higher in interim 2021, at *** percent, than in interim 2020, at *** percent.¹³¹

The Indonesian industry's exports increased irregularly during the period of review, as did the ratio of exports to total shipments.¹³² The quantity of exports from Indonesia increased from *** short tons (or *** percent of total shipments) in 2015 to *** short tons (or *** percent of total shipments) in 2020 and was *** short tons in interim 2021 (or *** percent of total shipments), compared to *** short tons in interim 2020 (or *** percent of total

¹²⁴ CR/PR at Tables IV-1, C-1.

¹²⁵ CR/PR at IV-60.

¹²⁶ See CR/PR at I-11 and Table IV-1.

¹²⁷ See *Certain Uncoated Paper From Brazil, the People's Republic of China, and Indonesia: Affirmative Final Determinations of Circumvention of the Antidumping Duty Orders and Countervailing Duty Orders for Certain Uncoated Paper Rolls*, 86 Fed. Reg. 71025 (Dec. 14, 2021).

¹²⁸ CR/PR at IV-61.

¹²⁹ CR/PR at IV-61, Table IV-23.

¹³⁰ CR/PR at IV-61, Table IV-23.

¹³¹ CR/PR at IV-61, Table IV-23.

¹³² CR/PR at Table IV-23.

shipments).¹³³ The top export markets for uncoated paper and paperboard (a category that includes in-scope and out-of-scope merchandise) from Indonesia in 2020 were China and Japan.¹³⁴ In 2015, just prior to the imposition of the antidumping and countervailing duty orders, the United States was among the top export markets for paper and paperboard from Indonesia, accounting for 6.7 percent of such exports by quantity, behind only Japan and Malaysia.¹³⁵

Subject imports from Indonesia undersold the domestic like product in all 41 of 41 quarterly comparisons during the original investigations, and in two of eight quarterly comparisons during the period of review.¹³⁶

We are unpersuaded by APP's argument that high freight costs will prevent subject imports from Indonesia from having a discernible adverse impact on the domestic industry after revocation.¹³⁷ As discussed above, there is evidence that freight costs began to decline after September 2021. In any event, the record shows that high freight costs did not prevent a subsidiary of APP from exporting 65,000 short tons of out-of-scope paper products to the United States from January 1, 2021 to November 14, 2021.¹³⁸ Nor did high freight costs preclude the Indonesian industry from exporting uncoated paper to the European Union, Middle East, and South/Central American in interim 2021, albeit at reduced volumes relative to interim 2020.¹³⁹ Given this, and the relatively higher prices available in the U.S. market, we find that freight costs are unlikely to prevent Indonesian producers from increasing their exports to the U.S. market after revocation.¹⁴⁰

Based on the foregoing, including the increasing volume of subject imports from Indonesia in the original investigations, the continued presence of subject imports from Indonesia during the POR, the significant underselling by subject imports from Indonesia during

¹³³ CR/PR at Table IV-23.

¹³⁴ CR/PR at Table IV-26. The United States was the smallest listed export market in 2020, accounting for 0.0 percent of exports of paper and paperboard from Indonesia. *Id.*

¹³⁵ CR/PR at Table IV-26.

¹³⁶ CR/PR at V-17, V-17 n.20, and Table V-7.

¹³⁷ APP Prehearing Br. at 12.

¹³⁸ See Domestic Interested Parties' Responses to Commissioner Questions at 52, Exhibit 19.

¹³⁹ CR/PR at Table IV-24; see, e.g., Navigator Posthearing Br. at I-23; Australian Paper Posthearing Br. at 6, Exhibit. 2.

¹⁴⁰ See CR/PR at Table IV-34. Moreover, we do not find it likely that Karta Halten B.V.'s (an affiliate of Paper Excellence, which assertedly controls APP) acquisition of Domtar will likely constrain Indonesian producers from increasing exports upon revocation. As noted above, Domtar has indicated that this transaction will not allow APP to control it, and that ***. Domestic Interested Parties Posthearing Br. at Exhibit 2. Moreover, this transaction would have no impact on the export behavior of the other major Indonesian producer and exporter, APRIL.

the original investigations, and the high and increasing export orientation of the Indonesian industry, we find that revocation of the antidumping and countervailing duty orders on subject imports from Indonesia would not likely have no discernible adverse impact on the domestic industry.

Portugal. In the original investigations, subject imports from Portugal increased from *** short tons in 2012 (U.S. importers' U.S. shipments of such imports accounted for *** percent of apparent U.S. consumption) to *** short tons in 2013 (U.S. importers' U.S. shipments of such imports accounted for *** percent of apparent U.S. consumption) and decreased to *** short tons in 2014 (U.S. importers' U.S. shipments of such imports accounted for *** percent of apparent U.S. consumption).¹⁴¹ The Commission received a questionnaire response from one firm, which accounted for all known production and exports of uncoated paper from Portugal to the United States in 2014.¹⁴²

The record indicates that one producer continues to account for all or nearly all production of uncoated paper in Portugal.¹⁴³ During the current period of review, subject imports from Portugal maintained a significant presence in the U.S. market despite the disciplining effect of the antidumping duty order, and accounted for no less than *** percent of apparent U.S. consumption during any full year or interim period of the period of review. The quantity of subject imports from Portugal was *** short tons in 2015 (or *** percent of apparent U.S. consumption), *** short tons in 2016 (or *** percent of apparent U.S. consumption), *** short tons in 2017 (or *** percent of apparent U.S. consumption), *** short tons in 2018 (or *** percent of apparent U.S. consumption), *** short tons in 2019 (or *** percent of apparent U.S. consumption), and *** short tons in 2020 (or *** percent of apparent U.S. consumption), for an overall decrease during the period.¹⁴⁴ Subject imports from Portugal were higher in interim 2021 at *** short tons (or *** percent of apparent U.S. consumption) than in interim 2020 at *** short tons (or *** percent of apparent U.S. consumption).¹⁴⁵

¹⁴¹ Confidential Staff Report from Original Investigations, EDIS Doc. 573166 at Table IV-4; *Original Determinations*, USITC Pub. 4592 at Table IV-4.

¹⁴² CR/PR at IV-74.

¹⁴³ Navigator Prehearing Br. at 1 n.1; CR/PR at IV-74.

¹⁴⁴ CR/PR at Tables IV-29, C-1.

¹⁴⁵ CR/PR at Tables IV-29, C-1. Although Navigator argues that subject imports from Portugal are subject to lower dumping margins relative to subject imports from other countries, Commerce's finding that Navigator continued to sell uncoated paper in the U.S. market at less than fair value in every administrative review indicates that it continued to supply the U.S. market with unfairly priced products throughout the POR. See CR/PR at Table I-7; Navigator Prehearing Br. at 7-10.

The Portuguese industry's capacity remained *** short tons from 2015 to 2019 before declining by *** percent in 2020 to *** short tons.¹⁴⁶ Capacity was *** short tons in interim 2021, compared to *** short tons in interim 2020.¹⁴⁷ The Portuguese industry's capacity utilization decreased by *** percentage points during the 2015 to 2020 period, from *** percent in 2015 to *** percent in 2020, but was *** percentage points higher in interim 2021, at *** percent, than in interim 2020, at *** percent.¹⁴⁸

Although the quantity of exports from Portugal decreased overall during the period of review, exports as a share of total shipments remained high as the Portuguese industry exported *** of its production. The Portuguese industry's exports declined irregularly from *** short tons (or *** percent of total shipments) in 2015 to *** short tons (or *** percent of total shipments) in 2020.¹⁴⁹ They were *** short tons in interim 2021 (*** percent of total shipments), compared to *** short tons in interim 2020 (*** percent of total shipments). The top export markets for uncoated paper and paperboard (a category that includes in-scope and out-of-scope merchandise) from Portugal in 2020 were France (13.3 percent of export shipments by quantity), Germany (13.2 percent of export shipments by quantity), Spain (9.7 percent of export shipments by quantity), and the United States (for 9.6 percent of export shipments by quantity).¹⁵⁰ In 2015, just prior to the imposition of the antidumping duty order, the United States was the top export market for uncoated paper and paperboard from Portugal, accounting for 14.3 percent of such exports of paper and paperboard from Portugal by quantity, followed by Germany and France.¹⁵¹

Subject imports from Portugal undersold the domestic like product in two of 30 quarterly comparisons during the original investigations, and in five of 26 quarterly comparisons during the period of review.¹⁵²

We are unpersuaded by Navigator's argument that subject imports from Portugal are likely to have no discernible adverse impact if the order were revoked because Navigator supplies a high-quality product that does not compete directly with the domestic like product. According to the record, a majority of responding purchasers reported that domestically

¹⁴⁶ CR/PR at IV-75, Table IV-29.

¹⁴⁷ CR/PR at Table IV-29.

¹⁴⁸ CR/PR at IV-75-76, Table IV-29. Navigator argues that its sheeting production is constrained by its papermaking capacity. Navigator's Posthearing Br. at 10-11. Information submitted by the company, however, shows that ***. Navigator's Posthearing Brief at Exhibit 4.

¹⁴⁹ CR/PR at Table IV-29.

¹⁵⁰ CR/PR at Table IV-32.

¹⁵¹ CR/PR at Table IV-32.

¹⁵² CR/PR at V-17, V-17 n.20, and Table V-7.

produced uncoated paper is comparable or superior to subject imports from Portugal with respect to most of 19 factors considered by purchasers, including quality meeting and exceeding industry standards, jamming/misfeeds, and opacity.¹⁵³ In addition, the domestic like product and subject imports from Portugal were both sold primarily to distributors, further demonstrating the direct competition between the two.¹⁵⁴ Moreover, like domestic producers, ***.¹⁵⁵ Even to the extent that subject imports from Portugal purportedly consisted of higher quality products, subject imports from Portugal generally ***.¹⁵⁶

Based on the foregoing, including the significant volume and increase in volume of subject imports from Portugal during the original investigations; the significant presence of subject imports from Portugal in the U.S. market during the POR; the increasingly aggressive pricing and underselling by subject imports from Portugal towards the end of the POR; and the Portuguese industry's large capacity, excess capacity, and export orientation, we find that revocation of the antidumping duty order on subject imports from Portugal would not likely have no discernible adverse impact on the domestic industry.

C. Likelihood of a Reasonable Overlap of Competition

The Commission generally has considered four factors intended to provide a framework for determining whether subject imports compete with each other and with the domestic like product.¹⁵⁷ Only a "reasonable overlap" of competition is required.¹⁵⁸ In five-year reviews, the

¹⁵³ CR/PR at Table II-12.

¹⁵⁴ CR/PR at Table II-1.

¹⁵⁵ See Foreign Producer Questionnaire, EDIS Doc. 75229 (Sept. 22, 2021) at II-9c; Domestic Interested Parties' Posthearing Br. at Exhibit 1, p. 67; *but see* Hearing Tr. at 173 (Redondo).

¹⁵⁶ CR/PR at Table V-4.

¹⁵⁷ The four factors generally considered by the Commission in assessing whether imports compete with each other and with the domestic like product are as follows: (1) the degree of fungibility between subject imports from different countries and between subject imports and the domestic like product, including consideration of specific customer requirements and other quality-related questions; (2) the presence of sales or offers to sell in the same geographical markets of imports from different countries and the domestic like product; (3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and (4) whether subject imports are simultaneously present in the market with one another and the domestic like product. See, e.g., *Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int'l Trade 1989).

¹⁵⁸ See *Mukand Ltd. v. United States*, 937 F. Supp. 910, 916 (Ct. Int'l Trade 1996); *Wieland Werke*, 718 F. Supp. at 52 ("Completely overlapping markets are not required."); *United States Steel Group v. United States*, 873 F. Supp. 673, 685 (Ct. Int'l Trade 1994), *aff'd*, 96 F.3d 1352 (Fed. Cir. 1996). We note, however, that there have been investigations where the Commission has found an insufficient overlap in competition and has declined to cumulate subject imports. See, e.g., *Live Cattle from Canada* (Continued...)

relevant inquiry is whether there likely would be competition even if none currently exists because the subject imports are absent from the U.S. market.¹⁵⁹

Fungibility. In the original investigations, the Commission found that all uncoated paper, regardless of source, was at least moderately fungible.¹⁶⁰ In the current reviews, most U.S. producers reported that uncoated paper from all country pairs were always interchangeable.¹⁶¹ Most importers reported that product from all country pairs were always or frequently interchangeable.¹⁶² Most purchasers reported that domestically produced uncoated paper was always or frequently interchangeable with subject imports from Australia, Brazil, and Portugal, while they reported that domestically produced uncoated paper was sometimes or never interchangeable with subject imports from China and Indonesia.¹⁶³

Nevertheless, a majority or plurality of responding purchasers reported that domestically produced uncoated paper was comparable to subject imports from each source, including China and Indonesia, with respect to 19 factors that influence purchasing decisions. Specifically, most responding purchasers reported that uncoated paper from the United States and Australia were comparable for 14 of 19 factors; a majority or plurality reported that uncoated paper from the United States and Brazil were comparable for 15 of 19 factors; a majority or plurality of purchasers reported that uncoated paper from the United States and China were comparable for 11 of 19 factors; a majority or plurality of purchasers reported that uncoated paper from the United States and Indonesia were comparable for 15 of 19 factors; and a majority or plurality of purchasers reported that uncoated paper from the United States and Portugal were comparable for 17 of 19 factors.¹⁶⁴

Channels of Distribution. In the original determinations, the Commission found that most domestically produced uncoated paper and subject imports were sold mainly to distributors.¹⁶⁵ The record in the current reviews shows that U.S. producers and importers of uncoated paper from each subject country continued to sell mainly to distributors.¹⁶⁶ U.S.

and Mexico, Inv. Nos. 701-TA-386 and 731-TA-812-813 (Preliminary), USITC Pub. 3155 at 15 (Feb. 1999), aff'd sub nom, Ranchers-Cattlemen Action Legal Foundation v. United States, 74 F. Supp. 2d 1353 (Ct. Int'l Trade 1999); Static Random Access Memory Semiconductors from the Republic of Korea and Taiwan, Inv. Nos. 731-TA-761-62 (Final), USITC Pub. 3098 at 13-15 (Apr. 1998).

¹⁵⁹ See generally, *Cheflene Corp. v. United States*, 219 F. Supp. 2d 1313, 1314 (Ct. Int'l Trade 2002).

¹⁶⁰ *Original Determinations*, USITC Pub. 4592 at 11-13.

¹⁶¹ CR/PR at Table II-13.

¹⁶² CR/PR at Table II-14.

¹⁶³ CR/PR at Table II-15.

¹⁶⁴ CR/PR at Table II-12.

¹⁶⁵ *Original Determinations*, USITC Pub. 4592 at 13.

¹⁶⁶ CR/PR at Table II-1.

producers sold most of the remainder of their product to retailers with a smaller portion sold directly to end users, while importers reported few or no sales of subject imports to retailers and end users.¹⁶⁷

Geographic Overlap. In the original investigations, the Commission found that most responding U.S. producers and importers of uncoated paper from all subject countries reported selling uncoated paper to all regions in the contiguous United States.¹⁶⁸ In the current reviews, most U.S. producers and importers of uncoated paper from all subject countries again reported selling uncoated paper to all regions in the contiguous United States.¹⁶⁹

Simultaneous Presence in Market. In the original investigations, the Commission found that domestically produced uncoated paper and subject imports from each source were simultaneously present in the U.S. market in all or nearly all months of the POI.¹⁷⁰ In the current reviews, domestically produced uncoated paper was present in the market throughout the period for which data were collected. Subject imports from Brazil and Portugal were present in all 79 months, subject imports from China were present in 75 of 79 months, subject imports from Indonesia were present in 59 of 79 months, and subject imports from Australia were present in 13 of 79 months.¹⁷¹

Conclusion. The record indicates that there would likely be a reasonable overlap of competition between and among subject imports from each source and the domestic like product if the orders were revoked. Specifically, the record of the reviews shows that subject imports from each source and the domestic like product are fungible. The record also shows that if the orders were revoked, domestically produced uncoated paper and subject imports from each source would likely be sold through similar channels of distribution and in overlapping geographic markets, and would likely be simultaneously present in the U.S. market, as they were during the original POI. We consequently find that there would likely be a reasonable overlap of competition among subject imports from Australia, Brazil, China, Indonesia, and Portugal and between subject imports from each source and the domestic like product should the orders under review be revoked.

¹⁶⁷ CR/PR at Table II-1.

¹⁶⁸ *Original Determinations*, USITC Pub. 4592 at 14.

¹⁶⁹ CR/PR at Table II-2.

¹⁷⁰ Subject imports from Brazil, China, Indonesia, and Portugal were present in all 45 months of the POI, and subject imports from Australia were present in 44 of 45 months. *Original Determinations*, USITC Pub. 4592 at 14.

¹⁷¹ CR/PR at IV-13, Table IV-5.

D. Likely Conditions of Competition

The record in these reviews does not indicate that there would be significant differences between the conditions of competition under which imports from each subject country are likely to compete if the orders were revoked. Imports from each country increased during the original POI and declined after the orders were imposed.¹⁷² Responding foreign producers had significant excess capacity towards the end of the POR;¹⁷³ and imports from every subject country but Australia maintained a presence in the U.S. market during most of the period.¹⁷⁴

As discussed above, we are unpersuaded by the arguments advanced by Australian Paper and APP that high freight costs would preclude increased subject imports from Australia and Indonesia, respectively, if the orders were revoked.¹⁷⁵ The record contains evidence indicating that freight costs on trans-Pacific shipments began to decline after September 2021, and that, in any event, elevated freight costs did not preclude exports of out-of-scope paper from Indonesia to the United States through November 2021, or exports of uncoated paper from Australia and Indonesia to third-country markets outside the Pacific region in interim 2021.¹⁷⁶ Moreover, producers in Australia and Indonesia possess sufficient excess capacity to continue their shipments to home and regional customers, capitalizing on the relatively lower freight costs on sales to such customers, while at the same time increasing their exports to the United States.¹⁷⁷

We are also unpersuaded by Navigator's argument that subject imports from Portugal are likely to compete under distinct conditions of competition after revocation. Navigator asserts that subject imports from Portugal are unique in having maintained a consistent presence in the U.S. market, but subject imports from Brazil and Indonesia were also present throughout the POI and POR, with the exception of subject imports from Indonesia being absent in interim 2021.¹⁷⁸ Navigator also asserts that its use of eucalyptus fiber results in higher quality paper that distinguishes its product from uncoated paper from other sources. However,

¹⁷² See CR/PR at Table IV-1; Confidential Staff Report from Original Investigations at Table C-1; *Original Determinations*, USITC Pub. 4592 at Table C-1.

¹⁷³ See CR/PR at Table IV-11, IV-16, IV-23, IV-29. As discussed above, although no foreign producer from China responded to the Commission's questionnaire, available information shows that the paper and paperboard industry in China is the largest in the world. CR/PR at IV-55.

¹⁷⁴ See CR/PR at Tables IV-11, IV-16, IV-23, IV-29.

¹⁷⁵ See Australian Paper Prehearing Br. at 10; APP Prehearing Br. at 2-9.

¹⁷⁶ See Domestic Interested Parties' Responses to Commissioner Questions at 52, Exhibit 19; CR/PR at Tables IV-1, IV-12, IV-24, V-1.

¹⁷⁷ See CR/PR at Tables IV-11, IV-16, IV-23, IV-29.

¹⁷⁸ CR/PR at Table IV-1.

evidence on the record indicates that eucalyptus fibers are also used by producers in Brazil and Australia.¹⁷⁹ Moreover, a majority or plurality of purchasers reported that subject imports from Portugal are comparable to domestically produced uncoated paper with respect to most purchasing factors, like imports from the other subject countries.¹⁸⁰ Further, uncoated paper imports from Portugal, like the domestic product and imports from the other subject countries, were also sold primarily to distributors.¹⁸¹

In addition, we are unpersuaded by Navigator's argument that subject imports from Portugal should not be cumulated because they are distinguishable from other subject imports in terms of their allegedly "fair pricing practices," lower antidumping duty margins, and absence of circumvention findings.¹⁸² Navigator consistently received positive dumping margins in administrative reviews before Commerce, indicating that Navigator continued to sell uncoated paper at LTFV during the POR.¹⁸³ As noted above, the pricing of subject imports from Portugal became increasingly aggressive towards the end of the POR, with overselling during the 2015-19 period turning into ***.¹⁸⁴ This underselling by subject imports from Portugal towards the end of the POR, which is highly relevant to our consideration of the pricing practices likely to prevail in the reasonably foreseeable future in the event of revocation, is similar to the pattern of intensified underselling exhibited by subject imports from Brazil during the same period.¹⁸⁵

Finally, subject imports from Portugal are not distinguishable from other subject imports, as Navigator argues, because Navigator produces other products on the same equipment used to produce uncoated paper, faces no trade barriers in third-country markets, and focuses on the EU market.¹⁸⁶ Like other subject industries, the Portuguese uncoated paper industry possessed significant excess capacity at the end of the POR with which it could increase exports to the United States without reducing shipments to home and regional customers.¹⁸⁷ Subject producers in Brazil, Indonesia, and Portugal reported producing other products on the same equipment used to produce subject uncoated paper during the POR.¹⁸⁸

¹⁷⁹ CR/PR at II-35.

¹⁸⁰ CR/PR at Table II-12.

¹⁸¹ CR/PR at Table II-1.

¹⁸² Navigator Prehearing Br. at 16-20.

¹⁸³ CR/PR at Table I-7. The fact that the Portuguese industry was not found to engage in an additional unfair act by circumventing the order does not suggest different conditions of competition that merit de-cumulation.

¹⁸⁴ See CR/PR at Table V-4.

¹⁸⁵ CR/PR at Table V-7.

¹⁸⁶ Navigator Prehearing Br. at 11-15; CR/PR at II-10 & Tables IV-29, IV-31.

¹⁸⁷ CR/PR at Table IV-29.

¹⁸⁸ CR/PR at IV-49, IV-68, IV-83, Tables IV-18, IV-25, IV-31.

The Australian industry also does not face trade barriers in any third-country markets, so the Portuguese industry is not unique in that regard.¹⁸⁹ Furthermore, the Portuguese industry exported significant volumes of uncoated paper to the United States throughout the original investigations and the POR, indicating that the United States has remained an important export market for Navigator notwithstanding the importance of the EU market for Navigator and the absence of third-country trade barriers.¹⁹⁰ If the orders were revoked, the U.S. market would likely be an important export market for producers of uncoated paper in all subject countries within a reasonably foreseeable time.

For the reasons above, we find that imports from each subject country are likely to compete under similar conditions of competition in the U.S. market if the orders were revoked.

E. Conclusion

Based on the foregoing, we find that subject imports from Australia, Brazil, China, Indonesia, and Portugal, respectively, would not be likely to have no discernible adverse impact on the domestic industry if the orders under review were revoked. We also find a likely reasonable overlap of competition among subject imports from different sources and between the subject imports from each subject country and the domestic like product. Finally, we find that imports from each subject country are likely to compete in the U.S. market under similar conditions of competition should the orders be revoked. We therefore exercise our discretion to cumulate subject imports from Australia, Brazil, China, Indonesia, and Portugal for purposes of our analysis in these reviews.

IV. Revocation of the Antidumping and Countervailing Duty Orders Would Likely Lead to Continuation or Recurrence of Material Injury Within a Reasonably Foreseeable Time

A. Legal Standards

In a five-year review conducted under section 751(c) of the Tariff Act, Commerce will revoke an antidumping or countervailing duty order unless: (1) it makes a determination that dumping or subsidization is likely to continue or recur and (2) the Commission makes a determination that revocation of the antidumping or countervailing duty order “would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable

¹⁸⁹ See CR/PR at IV-96.

¹⁹⁰ CR/PR at Table IV-32.

time.”¹⁹¹ The SAA states that “under the likelihood standard, the Commission will engage in a counterfactual analysis; it must decide the likely impact in the reasonably foreseeable future of an important change in the status quo – the revocation or termination of a proceeding and the elimination of its restraining effects on volumes and prices of imports.”¹⁹² Thus, the likelihood standard is prospective in nature.¹⁹³ The U.S. Court of International Trade has found that “likely,” as used in the five-year review provisions of the Act, means “probable,” and the Commission applies that standard in five-year reviews.¹⁹⁴

The statute states that “the Commission shall consider that the effects of revocation or termination may not be imminent, but may manifest themselves only over a longer period of time.”¹⁹⁵ According to the SAA, a “‘reasonably foreseeable time’ will vary from case-to-case, but normally will exceed the ‘imminent’ timeframe applicable in a threat of injury analysis in original investigations.”¹⁹⁶

Although the standard in a five-year review is not the same as the standard applied in an original investigation, it contains some of the same fundamental elements. The statute provides that the Commission is to “consider the likely volume, price effect, and impact of

¹⁹¹ 19 U.S.C. § 1675a(a).

¹⁹² SAA at 883-84. The SAA states that “{t}he likelihood of injury standard applies regardless of the nature of the Commission’s original determination (material injury, threat of material injury, or material retardation of an industry). Likewise, the standard applies to suspended investigations that were never completed.” *Id.* at 883.

¹⁹³ While the SAA states that “a separate determination regarding current material injury is not necessary,” it indicates that “the Commission may consider relevant factors such as current and likely continued depressed shipment levels and current and likely continued (sic) prices for the domestic like product in the U.S. market in making its determination of the likelihood of continuation or recurrence of material injury if the order is revoked.” SAA at 884.

¹⁹⁴ See *NMB Singapore Ltd. v. United States*, 288 F. Supp. 2d 1306, 1352 (Ct. Int’l Trade 2003) (“‘likely’ means probable within the context of 19 U.S.C. § 1675(c) and 19 U.S.C. § 1675a(a)”), *aff’d mem.*, 140 Fed. Appx. 268 (Fed. Cir. 2005); *Nippon Steel Corp. v. United States*, 26 CIT 1416, 1419 (2002) (same); *Usinor Industeel, S.A. v. United States*, 26 CIT 1402, 1404 nn.3, 6 (2002) (“more likely than not” standard is “consistent with the court’s opinion;” “the court has not interpreted ‘likely’ to imply any particular degree of ‘certainty’”); *Indorama Chemicals (Thailand) Ltd. v. United States*, 26 CIT 1059, 1070 (2002) (“standard is based on a likelihood of continuation or recurrence of injury, not a certainty”); *Usinor v. United States*, 26 CIT 767, 794 (2002) (“‘likely’ is tantamount to ‘probable,’ not merely ‘possible’”).

¹⁹⁵ 19 U.S.C. § 1675a(a)(5).

¹⁹⁶ SAA at 887. Among the factors that the Commission should consider in this regard are “the fungibility or differentiation within the product in question, the level of substitutability between the imported and domestic products, the channels of distribution used, the methods of contracting (such as spot sales or long-term contracts), and lead times for delivery of goods, as well as other factors that may only manifest themselves in the longer term, such as planned investment and the shifting of production facilities.” *Id.*

imports of the subject merchandise on the industry if the orders are revoked or the suspended investigation is terminated.”¹⁹⁷ It directs the Commission to take into account its prior injury determination, whether any improvement in the state of the industry is related to the order or the suspension agreement under review, whether the industry is vulnerable to material injury if an order is revoked or a suspension agreement is terminated, and any findings by Commerce regarding duty absorption pursuant to 19 U.S.C. § 1675(a)(4).¹⁹⁸ The statute further provides that the presence or absence of any factor that the Commission is required to consider shall not necessarily give decisive guidance with respect to the Commission’s determination.¹⁹⁹

In evaluating the likely volume of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether the likely volume of imports would be significant either in absolute terms or relative to production or consumption in the United States.²⁰⁰ In doing so, the Commission must consider “all relevant economic factors,” including four enumerated factors: (1) any likely increase in production capacity or existing unused production capacity in the exporting country; (2) existing inventories of the subject merchandise, or likely increases in inventories; (3) the existence of barriers to the importation of the subject merchandise into countries other than the United States; and (4) the potential for product shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products.²⁰¹

In evaluating the likely price effects of subject imports if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether there is likely to be significant underselling by the subject imports as compared to the domestic like product and whether the subject imports are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of the domestic like product.²⁰²

¹⁹⁷ 19 U.S.C. § 1675a(a)(1).

¹⁹⁸ 19 U.S.C. § 1675a(a)(1). Commerce has not issued any duty absorption findings since imposition of the orders. CR/PR at I-11 n.8.

¹⁹⁹ 19 U.S.C. § 1675a(a)(5). Although the Commission must consider all factors, no one factor is necessarily dispositive. SAA at 886.

²⁰⁰ 19 U.S.C. § 1675a(a)(2).

²⁰¹ 19 U.S.C. § 1675a(a)(2)(A-D).

²⁰² See 19 U.S.C. § 1675a(a)(3). The SAA states that “{c}onsistent with its practice in investigations, in considering the likely price effects of imports in the event of revocation and termination, the Commission may rely on circumstantial, as well as direct, evidence of the adverse effects of unfairly traded imports on domestic prices.” SAA at 886.

In evaluating the likely impact of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider all relevant economic factors that are likely to have a bearing on the state of the industry in the United States, including but not limited to the following: (1) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity; (2) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment; and (3) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.²⁰³ All relevant economic factors are to be considered within the context of the business cycle and the conditions of competition that are distinctive to the industry. As instructed by the statute, we have considered the extent to which any improvement in the state of the domestic industry is related to the orders under review and whether the industry is vulnerable to material injury upon revocation.²⁰⁴

B. Conditions of Competition and the Business Cycle

In evaluating the likely impact of the subject imports on the domestic industry if an order is revoked, the statute directs the Commission to consider all relevant economic factors "within the context of the business cycle and conditions of competition that are distinctive to the affected industry."²⁰⁵ The following conditions of competition inform our determinations.

1. Demand Conditions

In the original determinations the Commission found that demand for uncoated paper depends on demand for written or printed paper materials that use uncoated paper, such as office/personal/school copying or printing, books, business forms, instruction manuals, inserts, flyers, brochures, and maps.²⁰⁶ The parties involved in the original investigations agreed that U.S. demand for uncoated paper had been in decline for more than ten years.²⁰⁷ During the period of investigation, apparent U.S. consumption, by quantity, decreased by 5.5 percent

²⁰³ 19 U.S.C. § 1675a(a)(4).

²⁰⁴ The SAA states that in assessing whether the domestic industry is vulnerable to injury if the order is revoked, the Commission "considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they may also demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports." SAA at 885.

²⁰⁵ 19 U.S.C. § 1675a(a)(4).

²⁰⁶ *Original Determinations*, USITC Pub. 4592 at 18.

²⁰⁷ *Original Determinations*, USITC Pub. 4592 at 18.

declining from 4.7 million short tons in 2012 to 4.6 million short tons in 2013 and 4.5 million short tons in 2014.²⁰⁸

In the current reviews, the drivers of demand for uncoated paper remain the same as in the original investigations: demand for written or printed paper materials including office/personal/school copying or printing, books, business forms, instruction manuals, inserts, flyers, brochures, and maps.²⁰⁹ The record indicates that U.S. producers and importers of subject merchandise sold the majority of their uncoated paper to distributors.²¹⁰

Most market participants reported that electronic media reduced demand for uncoated paper during the POR, including all seven responding U.S. producers, 13 of 14 responding U.S. importers, and 15 of 19 responding U.S. purchasers.²¹¹ Apparent U.S. consumption, by quantity, decreased each full year of the POR, ending 38.0 percent lower in 2020 than in 2015. Apparent U.S. consumption by quantity was 4.0 million short tons in 2015, 3.8 million short tons in 2016, 3.7 million short tons in 2017, 3.6 million short tons in 2018, 3.4 million short tons in 2019, and 2.5 million short tons in 2020.²¹² It was 1.27 million short tons in interim 2021, compared to 1.26 million short tons in interim 2020.²¹³

In 2020, the COVID-19 pandemic further reduced demand for uncoated paper by disrupting office and school operations.²¹⁴ The record indicates that apparent U.S. consumption recovered somewhat in interim 2021,²¹⁵ although market participants' responses varied regarding the changes in demand that they anticipate in the future.²¹⁶ At the hearing, an official from Domtar stated that there had been a "slight uptick" in demand, while the chief executive officer of Navigator stated that a "mild recovery" in demand was underway.²¹⁷

2. Supply Conditions

In the original investigations, the Commission observed that the domestic industry was the largest supplier to the U.S. market but that its market share fell steadily from 2012 to

²⁰⁸ *Original Determinations*, USITC Pub. 4592 at 18-19.

²⁰⁹ CR/PR at II-1.

²¹⁰ CR/PR at Table II-1.

²¹¹ CR/PR at Table II-4.

²¹² CR/PR at Table I-18.

²¹³ CR/PR at Table I-18.

²¹⁴ CR/PR at II-1, 4, 16-17; Hearing Tr. at 32 (LeBlanc), 78 (Melton), 148 (Redondo); Domestic Interested Parties' Prehearing Br. at 9-10.

²¹⁵ CR/PR at Table I-18.

²¹⁶ CR/PR at II-15.

²¹⁷ Hearing Tr. at 122-23 (Melton), 245 (Redondo).

2014.²¹⁸ The Commission noted that the domestic industry closed several production facilities during the POI and that the shutdown of one of International Paper's mills in 2014 was primarily responsible for the largest reduction in the domestic industry's capacity during the POI.²¹⁹

During the current period of review, the domestic industry was the largest supplier to the U.S. market.²²⁰ U.S. producers' market share by quantity fluctuated but increased overall during the POR, from 84.1 percent in 2015 to 85.9 percent in 2020 and 83.0 percent in interim 2021, compared to 86.4 percent in interim 2020.²²¹

There were two plant closings, one expansion, and several acquisitions during the period of review.²²² Several U.S. producers also reported re-purposing uncoated paper machines and prolonged shutdowns or curtailments during the POR.²²³ U.S. producers' capacity decreased each year of the POR from 4.35 million short tons in 2015 to 3.48 million in 2020.²²⁴ It was 1.34 million short tons in interim 2021, compared to 1.85 million short tons in interim 2020.²²⁵ Four of eight U.S. producers reported supply constraints since January 1, 2015.²²⁶ Most purchasers (14 of 19) also reported that they had experienced supply constraints since January 1, 2015.²²⁷ Domestic Interested Parties assert, however, that any supply disruptions caused by the domestic industry's shutdowns and curtailments were temporary.²²⁸ In July 2021, Domtar restarted a paper machine at its Ashdown facility, with full production expected by January 2022.²²⁹

Subject imports were the second largest source of supply to the U.S. market in 2015 and 2016, but the smallest source of supply thereafter.²³⁰ Cumulated subject imports' market

²¹⁸ *Original Investigations*, USITC Pub. 4592 at 19.

²¹⁹ *Original Investigations*, USITC Pub. 4592 at 19.

²²⁰ CR/PR at Table I-19.

²²¹ CR/PR at Table I-19.

²²² CR/PR at Table III-2.

²²³ CR/PR at Table III-2.

²²⁴ CR/PR at Table III-4.

²²⁵ CR/PR at Table III-4.

²²⁶ CR/PR at II-11.

²²⁷ CR/PR at II-12.

²²⁸ Hearing Tr. at 31-32 (LeBlanc); Domestic Interested Parties' Posthearing Br. at Exhibit 1, pp. 87-88. A witness for the domestic interested parties testified that "[a]s capacity reductions are necessarily lumpy, they result in some short-term excess demand on the market." Hearing Tr. at 31-32 (LeBlanc).

²²⁹ CR/PR at II-7 n.14.

²³⁰ CR/PR at Table I-19.

share, by quantity, declined from *** percent of in 2015 to *** percent in 2020, but was higher in interim 2021 at *** percent than in interim 2020 at *** percent.²³¹

Nonsubject imports were the smallest source of supply to the U.S. market in 2015 and 2016 but the second largest supplier to the U.S. market thereafter.²³² Nonsubject imports' market share by quantity increased from *** percent in 2015 to *** percent in 2020, and was *** percent in interim 2021, compared to *** percent in interim 2020.²³³ The largest sources of nonsubject imports during the POR were Canada, Thailand, and Finland.²³⁴

3. Substitutability and Other Conditions

In the original investigations, the Commission found that there was a high degree of substitutability between the domestic like product and subject imports.²³⁵ The Commission observed that all responding U.S. producers reported that product from all sources was always interchangeable, and most responding importers and purchasers reported that product from all countries was either always or frequently interchangeable.²³⁶ The Commission also found that price was an important factor in purchasing decisions.²³⁷

In these reviews, we again find a high degree of substitutability between domestically produced uncoated paper and subject imports.²³⁸ Most U.S. producers reported that uncoated paper from all country pairs was always interchangeable.²³⁹ Most importers reported that product from all country pairs was always or frequently interchangeable.²⁴⁰ Although purchaser responses were more varied regarding their views on interchangeability,²⁴¹ a majority or plurality of responding purchasers reported that domestically produced uncoated paper was comparable to subject imports from each source with respect to most non-price factors.²⁴²

²³¹ CR/PR at Table I-19.

²³² CR/PR at Table I-19.

²³³ CR/PR at Table I-19.

²³⁴ CR/PR at II-11.

²³⁵ *Original Investigations*, USITC Pub. 4592 at 20.

²³⁶ *Original Investigations*, USITC Pub. 4592 at 20.

²³⁷ *Original Investigations*, USITC Pub. 4592 at 20.

²³⁸ CR/PR at II-18.

²³⁹ CR/PR at Table II-13.

²⁴⁰ CR/PR at Table II-14.

²⁴¹ CR/PR at Table II-15. Most purchasers reported that the domestic product was always or frequently interchangeable with subject imports from Australia, Brazil, and Portugal; a majority of purchasers reported that the domestic like product was sometimes or never interchangeable with subject imports from China or Indonesia. *Id.*

²⁴² CR/PR at Tables II-15 & II-18.

ENCLOSURE

We also find that price is an important factor in purchasing decisions, although other factors are important as well.²⁴³ Responding purchasers most frequently cited price, quality, and availability as the top three factors influencing their purchasing decisions. Quality was the most frequently reported first-most important factor (9 firms), followed by price (6 firms).²⁴⁴ Responding purchasers most frequently reported availability (19 firms), reliability of supply (18 firms), quality meets industry standards (17 firms), and product consistency (17 firms) as very important to their purchasing decisions.²⁴⁵ Sixteen responding purchasers reported price as very important, tied with delivery time and runnability (16 firms each),²⁴⁶ and most purchasers reported that they always or usually purchase the lowest priced product.²⁴⁷

The principal raw materials for uncoated paper are paper pulp, recycled fibers, and a range of chemicals.²⁴⁸ On a per-unit basis, raw material costs increased irregularly from \$376 in 2015 to \$388 in 2020, but were lower in interim 2021 (at \$361) compared to interim 2020 (at \$399).²⁴⁹ As a share of total COGS, raw material costs decreased irregularly from 47.3 percent in 2015 to 42.9 percent in 2020, but was higher in interim 2021 at 44.5 percent compared to interim 2020 at 41.9 percent.²⁵⁰ Company specific per-short ton raw material costs varied widely within the industry due to the level of vertical integration and primary inputs used to produce uncoated paper.²⁵¹

Responding U.S. producers reported most frequently setting prices by contracts, followed by transaction-by-transaction and set price list; a majority of responding importers reported using transaction-by-transaction to set prices.²⁵² A majority of U.S. producers' commercial shipments were under annual contracts with spot sales accounting for the next largest share of shipments; a majority of subject imports were sold through spot sales followed by annual contracts.²⁵³

As discussed above, the record indicates that freight costs increased to historical levels during the POR, but that freight costs began to decline after September 2021.²⁵⁴

²⁴³ CR/PR at Tables II-8 & II-9.

²⁴⁴ CR/PR at Table II-8.

²⁴⁵ CR/PR at Table II-9.

²⁴⁶ CR/PR at Table II-9.

²⁴⁷ CR/PR at II-20.

²⁴⁸ CR/PR at V-1.

²⁴⁹ CR/PR at III-29-30, Table III-12.

²⁵⁰ CR/PR at Table III-12.

²⁵¹ CR/PR at III-32-33, Table III-14.

²⁵² CR/PR at Table V-2.

²⁵³ CR/PR at Table V-3.

²⁵⁴ See CR/PR at Table V-1; Hearing Tr. at 75 (Byers), 77 (Rotolo); Domestic Interested Parties' Responses to Commissioner Questions at 46-52, Exhibits 15-19.

Effective September 24, 2018, subject imports from China became subject to an additional 10 percent *ad valorem* duty under Section 301 of the Trade Act of 1974²⁵⁵ ("section 301 tariffs").²⁵⁶ Effective May 10, 2019, this additional duty increased from 10 percent to 25 percent *ad valorem*.²⁵⁷

C. Likely Volume of Subject Imports

Original Investigations. In the original investigations, the Commission observed that the volume of cumulated subject imports increased sharply during the POI, increasing from *** short tons in 2012 to *** short tons in 2014.²⁵⁸ Cumulated subject imports' market share also increased, from *** percent in 2012 to *** percent in 2014.²⁵⁹ The Commission found that the volume and increase in volume of cumulated subject imports were significant both in absolute terms and relative to consumption in the United States.²⁶⁰

Current Reviews. Cumulated subject imports maintained a smaller, but significant presence in the U.S. market throughout the POR even with the discipline of the orders. Cumulated subject imports volumes were *** short tons in 2015, *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, and *** short tons in 2020; cumulated subject import volumes were higher in interim 2021 (*** short tons) than in interim 2020 (*** short tons).²⁶¹ Cumulated subject import market share over this period was *** percent in 2015, *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, and *** percent in 2020; their market share was also higher in interim 2021 (*** percent) than in interim 2020 (*** percent).²⁶² While cumulated subject import volumes and market share declined overall during the POR, there were two increases in subject import volume during the POR, between 2018 and 2019 and in interim 2021 compared to interim 2020, which came at the domestic industry's expense.²⁶³ We find that the overall declines in

²⁵⁵ 19 U.S.C. § 2411.

²⁵⁶ CR/PR at I-21.

²⁵⁷ CR/PR at I-21.

²⁵⁸ Confidential Original Determinations at 31; *Original Determinations*, USITC Pub. 4592 at 21.

²⁵⁹ Confidential Original Determinations at 31; *Original Determinations*, USITC Pub. 4592 at 21-

22.

²⁶⁰ *Original Determinations*, USITC Pub. 4592 at 22.

²⁶¹ CR/PR at Table I-18.

²⁶² CR/PR at Table I-19.

²⁶³ Between 2018 and 2019, the domestic industry's shipments declined from 3.2 million shorts to 3.0 million short tons, and its market share declined from 89.0 percent to 87.4 percent. Between interim 2020 and interim 2021, the domestic industry's shipments declined from 1.09 million short tons to 1.05 million short tons, and its market share declined from 86.4 percent to 83.0 percent. CR/PR at Tables I-18 & I-19.

cumulated imports' volume and market share during the POR reflect the disciplining effect of the orders.²⁶⁴

The subject industries have the ability to export significant volumes of subject merchandise to the United States in the event of revocation. Subject uncoated paper firms have significant production capacity that remained relatively steady over the POR,²⁶⁵ and this capacity remained greater than either apparent U.S. consumption or the domestic industry's capacity throughout the POR.²⁶⁶ Further, subject producers have significant unused capacity,²⁶⁷ maintain substantial end-of-period inventories,²⁶⁸ and are export oriented, having exported ***

²⁶⁴ Respondent interested parties argue that increases in freight rates at the end of the POR would likely discourage exports from subject industries to the United States in the event of revocation. *See, e.g.*, Australian Paper Prehearing Br. at 30, APP Prehearing Br. at 11-12. While we recognize that freight costs were elevated in 2021, the record indicates that such costs began to decline after September 2021, as discussed above. *See* CR/PR at Table V-1; Hearing Tr. at 75 (Byers), 77 (Rotolo); Domestic Interested Parties' Responses to Commissioner Questions at 46-51, Exhibits 15-18. Nor does the record show that elevated freight costs in 2021 caused declines in cumulated subject import volumes or in subject producers' exports to the United States. Cumulated subject imports volumes in the United States were higher in Interim 2021 than in interim 2020. CR/PR at Table I-18. Further, subject producers' exports to the United States were higher in interim 2021 (** short tons) than in interim 2020 (** short tons); the ratio of subject producers' exports to the United States was also higher in interim 2021 (** percent) than in interim 2020 (** percent). CR/PR at Table IV-34. Thus, the record does not support the conclusion that freight rates would likely discourage exports to the United States in the event of revocation.

²⁶⁵ Total sheeting capacity for responding subject producers was *** short tons from 2015-2017, *** short tons from 2018 to 2019, and *** short tons in 2020; their sheeting capacity was *** short tons in interim 2020 and interim 2021. Between 2015 and 2020, subject producers' sheeting capacity declined only *** short tons, or by *** percent. CR/PR at Table IV-33. In comparison, apparent U.S. consumption of uncoated paper declined by 38.0 percent over this period. CR/PR at Table C-1.

²⁶⁶ Apparent U.S. consumption was highest in 2015, at 4.0 million short tons, and declined thereafter to 2.5 million short tons in 2020; it was 1.3 million short tons in Interim 2020 and interim 2021. Domestic producers' greatest sheeting capacity was 4.3 million short tons in 2015 and declined thereafter to 3.5 million short tons in 2020; it was 1.9 million short tons in interim 2020 and 1.3 million short tons in interim 2021. CR/PR at Table C-1.

²⁶⁷ Cumulated subject producers reported available sheeting capacity throughout the POR. Their capacity utilization rate was *** percent in 2015 and 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, and *** percent in 2020; it was *** percent in interim 2020 and *** percent in interim 2021. CR/PR at Table IV-33.

²⁶⁸ Total end-of-period inventories of responding producers in the subject countries were *** short tons in 2015, *** short tons in 2016, *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, and *** short tons in 2020; they were *** short tons in interim 2020 and *** short tons in interim 2021. CR/PR at Table IV-33. We recognize that these inventories likely reflect a variety of paper sizes, including A4 paper not commonly used in the United States. Nonetheless, the record supports that these inventories likely include types of uncoated paper used in the U.S. market. Other countries and regions use the 8.5 x 11 inch letter size paper common in the United States, and subject producers (Continued...)

percent of their total shipments in 2020.²⁶⁹ That same year, the excess capacity possessed by subject producers, *** short tons, was equivalent to *** percent of apparent U.S. consumption that year.²⁷⁰ Finally, given the high fixed costs incurred by integrated producers of uncoated paper,²⁷¹ there are strong incentives to export when experiencing declining shipments in other markets, so as to maintain economic rates of capacity utilization.²⁷²

The U.S. remains an attractive export market for subject producers, providing them with the incentive to export significant volumes of subject merchandise to the United States in the event of revocation. The record indicates that the average unit values ("AUV") of exports from each subject country from 2015-2020 were higher for exports to the U.S. market than for exports to other destination markets.²⁷³ Moreover, the existence of third-country trade barriers to subject imports from Brazil, China, and Indonesia would increase the relative attractiveness of the U.S. market to subject producers in those countries in the event of revocation,²⁷⁴ and the

exported to these regions over the POR. CR/PR at II-5 (other countries using 8.5 x 11 inch paper are Canada, Chile, Colombia, Costa Rica, Mexico, Panama, Guatemala, the Dominican Republic, and the Philippines); see also CR/PR at Table IV-34 (indicating that subject producers exports to Central/South America were greater than those to the United States throughout the POR). Finally, the pricing data confirm commercial U.S. shipments of 8.5 x 11 inch paper from each subject country over the POR. CR/PR at V-7-8.

²⁶⁹ Exports accounted for the vast majority of the subject industries' total shipments throughout the POR. Their exports accounted for *** percent of total shipments in 2015, *** percent in 2016, *** percent in 2016, *** percent in 2018, *** percent in 2019, and *** percent in 2020; exports accounted for *** percent of shipments in interim 2020 and *** percent in interim 2021. CR/PR at Table IV-33.

²⁷⁰ Calculated from CR/PR at Table IV-33 and Table C-1. Given the large size of the subject producers' excess capacity relative to the size of the U.S. market, we are unpersuaded by Australian Paper's argument that cumulated subject producers operated at high capacity-utilization rates that would preclude a significant increase in exports to the United States in the event of revocation. Australian Paper Prehearing Br. at 26.

²⁷¹ See, e.g., Hearing Tr. at 86 (Vaughn).

²⁷² For instance, while subject producers' total shipments declined between 2019 and 2020, export shipments declined less than home market shipments. As a result, subject producers' share of export shipments reached their highest level of the POR in 2020, *** percent, indicating an increased reliance on exports in a declining market. CR/PR at Table IV-33.

²⁷³ From 2015 to 2020, the AUVs for subject producers' exports to the United States were higher than those to any other export market. Only in interim 2021 were subject producers' AUVs to other markets higher than those to the United States, yet the ratio of exports to the United States versus other markets also increased in this time relative to interim 2020, indicating an increased reliance on the U.S. market notwithstanding lower AUVs. CR/PR at Table IV-34.

²⁷⁴ Subject producers face trade remedy actions in several third-country markets. Australia has imposed antidumping measures on A4 copy paper from Brazil, China, and Indonesia, and a countervailing measure on A4 copy paper from China. India has imposed an antidumping measure on uncoated copy paper from Indonesia. Mexico has imposed an antidumping measure on bond paper

(Continued...)

increasing presence of nonsubject imports in the U.S. market over the POR illustrates the general attractiveness of the United States as a destination market for uncoated paper exports.²⁷⁵ Finally, Commerce's affirmative circumvention determinations with respect to all orders on subject imports in 2017 and the orders on subject imports from Brazil, China, and Indonesia in December 2021 indicate that subject producers in those countries remain highly interested in serving the U.S. market.²⁷⁶

Accordingly, based on the subject producers' behavior during the original investigations, the continued significant presence of cumulated subject imports in the U.S. market during the POR, and subject producers' substantial production capacity, available unused capacity, inventories, export orientation, and the attractiveness of the U.S. market, we find that the likely volume of cumulated subject imports would be significant in the event of revocation.²⁷⁷

D. Likely Price Effects of Subject Imports

Original Investigations. The Commission found that the cumulated subject imports and the domestic like product were highly substitutable and that price was an important factor in purchasing decisions.²⁷⁸ The Commission focused its pricing analysis on pricing product 1

from Brazil, and Pakistan has imposed antidumping measures on uncoated printing and writing paper from Brazil, China, and Indonesia. CR/PR at IV-96.

²⁷⁵ In a declining U.S. market, imports from nonsubject sources increased absolutely each year between 2015 and 2019 and between the interim periods, and their decrease in quantity between 2019 and 2020 was less than declines in apparent U.S. consumption and resulted in an increased market share. Their share of the U.S. market increased each year of the POR, from *** percent in 2015 to *** percent in 2020, and it was higher in Interim 2021 (*** percent) than in Interim 2020 (*** percent). CR/PR at Table C-1.

Further, the Commission notes the significant volume of arranged subject imports in the second half of 2021, which reflects not only subject imports' continuing presence in the U.S. market but also the continuing interest by subject producers in the U.S. market. Arranged subject imports in that period totaled *** short tons, which is equal to *** percent of apparent U.S. consumption, *** percent of total U.S. imports, and *** percent of subject imports, in the Interim 2021 period. *Calculated from* CR/PR at Table IV-7 *and* Table C-1.

²⁷⁶ As discussed above, Commerce in 2017 found that imports of 83 bright paper from all subject countries had been altered in form or appearance in minor respects from subject merchandise and were circumventing the orders, and it found in 2021 that imports of sheeter rolls from China, Brazil, and Indonesia that are converted into uncoated paper sheets within the United States were circumventing the orders. *See 2017 Circumvention Determination & 2021 Circumvention Determination.*

²⁷⁷ We have also considered the other statutory factor – *i.e.*, the potential for product shifting – in our analysis of likely subject import volume. Producers in two of the five subject countries, *** and ***, indicated that they can shift from production of other products to production of subject merchandise using existing equipment. *See* CR/PR at Table II-3.

²⁷⁸ *Original Determinations*, USITC Pub. 4592 at 22.

565 F. 3d 1017

because sales for this product represented approximately *** percent of all sales for which pricing data were collected and accounted for nearly all competition between subject imports and the domestic like product.²⁷⁹ These pricing data showed that prices of cumulated subject imports undersold the domestic like product for pricing product 1 in 50 of 75 instances.²⁸⁰ The quantity of cumulated subject imports in quarters of underselling for product 1 was 1,021,856 short tons, compared to 508,245 short tons of cumulated subject imports in quarters of overselling. Due to the predominance of underselling and the importance of price in purchasing decisions, the Commission found the underselling by cumulated subject imports to be significant.²⁸¹

The Commission also found that cumulated subject imports had significantly depressed prices for the domestic like product. It observed that prices for domestically produced product 1 generally trended downward through 2013, increased during the first two quarters of 2014, and then declined again after the domestic producers were not able to sustain their earlier price increases.²⁸² The Commission noted that a substantial number of purchasers reported that domestic producers reduced prices in order to compete with lower-priced subject imports. The Commission concluded that cumulated subject imports had significant adverse effects on prices of the domestic like product.²⁸³

Current Reviews. As discussed above, the record in these reviews indicates that there is a high degree of substitutability between domestically produced uncoated paper and uncoated paper imported from subject sources, and that price is an important factor in purchasing decisions.

The Commission collected quarterly pricing data from U.S. producers and importers for one uncoated paper product shipped to unrelated U.S. customers during the POR.²⁸⁴ Eight U.S. producers and 9 importers provided usable pricing data for sales of the requested product, although not all firms reported pricing for the product for all quarters.²⁸⁵ In 2020, pricing data reported by these firms accounted for approximately 79.8 percent of U.S. producers' shipments

²⁷⁹ Confidential Original Determinations at 33, 35; *Original Determinations*, USITC Pub. 4592 at 21-23, 25.

²⁸⁰ *Original Determinations*, USITC Pub. 4592 at 22.

²⁸¹ *Original Determinations*, USITC Pub. 4592 at 23-24.

²⁸² *Original Determinations*, USITC Pub. 4592 at 24.

²⁸³ *Original Determinations*, USITC Pub. 4592 at 25.

²⁸⁴ CR/PR at V-7. The one pricing product, Product 1, is: Uncoated paper, weighing 20lb. (75 gsm), with dimensions of 8.5 x 11 inches, and with GE brightness greater than 90 white and plain (i.e., not altered through processes such as surface-decorating, printing, embossing, perforating, punching, or watermarking). *Id.*

²⁸⁵ CR/PR at V-7.

of uncoated paper, *** percent of U.S. shipments for subject imports from Brazil, and *** percent of U.S. shipments for subject imports from Portugal.²⁸⁶

These pricing data indicate that cumulated subject imports undersold the domestic like product in 37 of 70 quarterly comparisons, or 52.9 percent of the time, at underselling margins that ranged from 0.5 percent to 20.4 percent and averaging 5.3 percent; the quantity of subject imports in these comparisons was 438,151 short tons, or 47.3 percent of the total.²⁸⁷ Underselling increased during the latter portion of the period of review, in 2020 and interim 2021, when it accounted for nearly all quarterly comparisons and reported subject import sales volumes.²⁸⁸ For the entire POR, cumulated subject imports oversold the domestic like product in the remaining 33 comparisons, or 47.1 percent of the time, at overselling margins ranging from 0.5 percent to 17.2 percent and averaging 6.8 percent; the quantity of subject imports involved in these data was 487,454 short tons, or 52.7 percent of the total.²⁸⁹ Thus, notwithstanding the discipline of the orders, subject imports undersold the domestic like product in a majority of comparisons, which encompassed *** of the total volume of subject imports during the POR, and this underselling increased in 2020 and 2021.²⁹⁰

In light of the underselling observed during the original POI and during the POR with the orders in place, the significance of price in purchasing decisions, and the high degree of

²⁸⁶ CR/PR at V-7-8. There were no commercial U.S. shipments of subject imports from Australia, China, or Indonesia in 2020. However, over the entirety of the POR, pricing data accounted for *** percent of U.S. shipments for subject imports from Australia, *** percent of U.S. shipments for subject imports from China, and *** percent of U.S. shipments for subject imports from Indonesia. *Id.* at V-8 n.16.

In its comments on draft questionnaires, Navigator proposed additional pricing products that it argued would have given broader product coverage. Navigator's Responses to Commissioner Questions at 42. As summarized above, however, Product 1 accounted for *** of commercial U.S. shipments from the domestic industry and all subject countries. Navigator's counsel further conceded that the single pricing product resulted in "high coverage" for the POR. Hearing Tr. at 240-241 (Alves).

²⁸⁷ CR/PR at Table V-7.

²⁸⁸ In 2020 and 2021, subject imports undersold the domestic like product in *** of *** quarterly comparisons and involving *** short tons, versus *** quarter of overselling involving *** short tons. CR/PR at Table V-8.

²⁸⁹ CR/PR at Table V-7.

²⁹⁰ Australian Paper argues that because a majority of the reported sales quantity of subject imports corresponded to quarters of overselling, subject imports are unlikely to undersell the domestic like product in the event of revocation. Australian Paper Prehearing Br. at 30. As noted above, however, the quantity of subject imports corresponding to quarters of underselling accounted for 47.3 percent of the total quantity, and this underselling occurred even under the disciplining effect of the orders. Given the prevalence of this underselling and the increases in instances of underselling in 2020 and 2021, we find that subject producers would likely significantly undersell the domestic like product in the event of revocation, as a means of increasing their exports to the U.S. market.

substitutability between the domestic like product and subject imports, we find that significant underselling by cumulated subject imports is likely in the event of revocation.²⁹¹ Additionally, because price is an important factor in purchasing decisions and the domestic like product and subject imports are substitutable, the significant quantities of cumulated subject imports that would likely enter the United States and that would likely undersell the domestic like product would likely force the domestic industry to lower prices, forego price increases, or risk losing market share. Consequently, we find that cumulated subject imports would likely have significant price effects in the event of revocation within a reasonably foreseeable time.

E. Likely Impact of Subject Imports

Original Investigations. In the original investigations, the Commission found that the domestic industry's performance indicators almost universally declined.²⁹² It observed that the industry's U.S. shipments, net sales, and production all declined steadily between 2012 and 2014, and remained relatively unchanged from interim 2014 to interim 2015.²⁹³ It noted that the domestic industry's market share also declined steadily from 2012 to 2014, and that its market share in interim 2015 remained below 2012 and 2013 levels.²⁹⁴ Production-related workers, hours worked, and wages also decreased over the POI, although productivity increased.²⁹⁵ It observed that the domestic industry's operating income and net income declined sharply during the POI.²⁹⁶ The Commission determined that the significant and increasing volume of cumulated subject imports, at prices that undersold the domestic like product and had significant price effects on the domestic like product, had a significant impact on the domestic industry by reducing its market share, production, shipments, revenues, and financial performance.²⁹⁷

In its non-attribution analysis, the Commission found that the declining demand for uncoated paper could not fully explain the declines in the domestic industry's production, capacity utilization, shipments, market share, and financial performance observed during the

²⁹¹ The Commission notes that, in its expedited reviews, Commerce determined that revocation of the subject orders would be likely to lead to continuation or recurrence of dumping and/or subsidization at generally significant margins. CR/PR at Tables I-8-14.

²⁹² *Original Determinations*, USITC Pub. 4592 at 26.

²⁹³ *Original Determinations*, USITC Pub. 4592 at 26-27.

²⁹⁴ *Original Determinations*, USITC Pub. 4592 at 28.

²⁹⁵ *Original Determinations*, USITC Pub. 4592 at 28.

²⁹⁶ *Original Determinations*, USITC Pub. 4592 at 28.

²⁹⁷ *Original Determinations*, USITC Pub. 4592 at 29.

POI.²⁹⁸ It also found prices for nonsubject imports from Canada were higher than the prices for subject imports in 166 of 182 comparisons and concluded that nonsubject imports could not explain the significant price effects and impact observed during the POI.²⁹⁹

Current Reviews. The domestic industry's trade indicators generally declined during the POR. U.S. producers' capacity measured in short tons, decreased from 4.35 million in 2015 to 4.31 million in 2016, 4.29 million in 2017, 4.26 million in 2018, 3.97 million in 2019, and 3.48 million in 2020; it was lower in interim 2021 at 1.34 million short tons compared to interim 2020 at 1.85 million short tons.³⁰⁰ Production, measured in short tons, decreased from 3.64 million in 2015 to 3.53 million in 2016, 3.50 million in 2017, 3.43 million in 2018, 3.20 million in 2019, and 2.21 million in 2020; production was lower in interim 2021 at 1.04 million short tons compared to interim 2020 at 1.12 million short tons.³⁰¹ Capacity utilization also decreased during the POR with the largest decrease occurring from 2019 to 2020; capacity utilization was 83.8 percent in 2015, 81.9 percent in 2016, 81.5 percent in 2017, 80.4 percent in 2018, 80.5 percent in 2019, and 63.5 percent in 2020; it was higher in interim 2021 at 77.3 percent than interim 2020 at 60.5 percent.³⁰²

The domestic industry's volume-related indicators generally declined in tandem with the industry's production, although the industry's market share increased irregularly from 2015 to 2020. The industry's net sales by quantity in short tons decreased from 3.63 million in 2015 to 3.55 million in 2016, 3.49 million in 2017, 3.44 million in 2018, 3.16 million in 2019, and 2.26 million in 2020; net sales were lower in interim 2021 at 1.10 million short tons compared to interim 2020 at 1.15 million short tons.³⁰³ U.S. producers' U.S. shipments by quantity decreased during the POR from 3.39 million short tons in 2015 to 3.33 million short tons in 2016, 3.26 million short tons in 2017, 3.19 million short tons in 2018, 2.95 million short tons in 2019, and 2.14 million short tons in 2020; U.S. shipments were lower in interim 2021 at 1.05 million short tons than in interim 2020 at 1.09 million short tons.³⁰⁴ U.S. producers' U.S. shipments as a share of apparent U.S. consumption was 84.1 percent in 2015, 88.5 percent in 2016 and 2017, 89.0 percent in 2018, 87.4 percent in 2019, and 85.9 percent in 2020; it was lower in interim 2021 at 83.0 percent than interim 2020 at 86.4 percent.³⁰⁵ U.S. producers' inventories

²⁹⁸ *Original Determinations*, USITC Pub. 4592 at 29-30.

²⁹⁹ *Original Determinations*, USITC Pub. 4592 at 30.

³⁰⁰ CR/PR at Table III-6.

³⁰¹ CR/PR at Table C-1.

³⁰² CR/PR at Table C-1.

³⁰³ CR/PR at Table C-1.

³⁰⁴ CR/PR at Table C-1.

³⁰⁵ CR/PR at Table C-1.

fluctuated but declined overall during the POR, and were 347,848 short tons in 2015, 335,251 short tons in 2016, 346,627 short tons in 2017, 334,573 short tons in 2018, 391,314 short tons in 2019, and 298,457 short tons in 2020; U.S. producers' inventories were lower in interim 2021 at 234,633 short tons than interim 2020 at 349,974 short tons.³⁰⁶

The domestic industry's employment-related indicators generally fluctuated but decreased overall and reached period-lows in 2020. The number of production-related workers was 5,844 in 2015, 5,836 in 2016, 5,489 in 2017, 5,816 in 2018, 5,683 in 2019, and 4,201 in 2020; there were fewer production workers in interim 2021 at 3,242 compared to interim 2020 at 4,488.³⁰⁷ Total hours worked were 12.46 million in 2015, 12.41 million in 2016, 12.11 million in 2017, 12.65 million in 2018, 12.06 million in 2019, and 9.41 million in 2020; fewer total hours were worked in interim 2021 at 3.95 million hours than interim 2020 at 5.17 million hours.³⁰⁸ Similarly, total wages paid were \$485.50 million in 2015, \$490.97 million in 2016, \$461.57 million in 2017, \$495.92 million in 2018, \$497.91 million in 2019, and \$388.68 million in 2020; total wages paid were lower in interim 2021 at \$164.11 million than interim 2020 at \$214.15 million.³⁰⁹ Hourly wages did not follow this trend, instead increasing overall and reaching a period-low in 2017 and a period-high in 2020; hourly wages were \$38.96 in 2015, \$39.58 in 2016, \$38.11 in 2017, \$39.21 in 2018, \$41.28 in 2019, and \$41.29 in 2020; hourly wages were higher in interim 2021 at \$41.55 than interim 2020 at \$41.45.³¹⁰ Productivity, measured by short tons per 1,000 hours, fluctuated but decreased overall, and was 292 in 2015, 285 in 2016, 289 in 2017, 271 in 2018, 265 in 2019, and 235 in 2020; productivity was higher in interim 2021 at 263 short tons per 1,000 hours than interim 2020 at 217 short tons per 1,000 hours.³¹¹

Most of the domestic industry's financial indicators also generally declined from 2016 to 2020 before improving in interim 2021 compared to interim 2020. Gross profit fluctuated but decreased overall and was \$514.86 million in 2015, \$477.70 million in 2016, \$450.25 million in 2017, \$357.81 million in 2018, \$559.21 million in 2019, and \$261.27 million in 2020; gross profit was greater in interim 2021 at \$227.59 million than interim 2020 at \$81.20 million.³¹² Operating income fluctuated but decreased overall and was \$292.36 million in 2015, \$263.37 million in 2016, \$235.56 million in 2017, \$146.84 million in 2018, \$350.47 million in 2019, and \$159.48 million in 2020; operating income was greater in interim 2021 at \$179.56 million

³⁰⁶ CR/PR at Table C-1.

³⁰⁷ CR/PR at Table C-1.

³⁰⁸ CR/PR at Table C-1.

³⁰⁹ CR/PR at Table C-1.

³¹⁰ CR/PR at Table C-1.

³¹¹ CR/PR at Table C-1.

³¹² CR/PR at Table C-1.

compared to interim 2020 at \$19.36 million.³¹³ The industry's ratio of operating income to net sales was 8.6 percent in 2015, 7.9 percent in 2016, 7.3 percent in 2017, 4.4 percent in 2018, 10.7 percent in 2019, and 6.9 percent in 2020; the ratio of operating income to net sales was greater in interim 2021 at 16.0 percent compared to interim 2020 at 1.6 percent.³¹⁴ The domestic industry's net income fluctuated but decreased overall and was \$224.66 million in 2015, \$233.24 million in 2016, \$134.51 million in 2017, negative \$157.44 million in 2018, \$301.85 million in 2019, and negative \$11.61 million in 2020; net income was greater in interim 2021 at \$166.70 million compared to interim 2020 at \$10.33 million.³¹⁵ The industry's return on assets was *** percent in 2015, *** percent in 2016, *** percent in 2017, *** percent in 2018, *** percent in 2019, and *** percent in 2020.³¹⁶ Capital expenditures fluctuated but increased overall and initially decreased from \$*** in 2015 to \$*** in 2016, increased to \$*** in 2017, \$*** in 2018 and to its period-high \$*** in 2019, and decreased to \$*** in 2020; capital expenditures were higher in interim 2021 at \$*** than interim 2020 at \$***.³¹⁷ The domestic industry's research and development expenses fluctuated but decreased overall and were \$*** in 2015, \$*** in 2016, \$*** in 2017, \$*** in 2018, \$*** in 2019, \$*** in 2020, and were higher in interim 2021 at \$*** than interim 2020 at \$***.³¹⁸

In assessing the vulnerability of the domestic industry, we observe that the record evidence is mixed. Many of the domestic industry's performance indicators, such as production, capacity utilization, and net sales decreased during the POR, and apparent U.S. consumption declined throughout the period before recovering modestly in interim 2021 compared to interim 2020. However, the industry's market share remained predominant and increased irregularly during the POR, and its gross profit, operating income, operating income margin, net income, and capital expenditures were much higher in interim 2021 than in interim 2020.³¹⁹

³¹³ CR/PR at Table C-1.

³¹⁴ CR/PR at Table C-1.

³¹⁵ CR/PR at Table C-1.

³¹⁶ CR/PR at Table III-20.

³¹⁷ CR/PR at Table C-1.

³¹⁸ CR/PR at Table C-1.

³¹⁹ Given the long term secular decline in demand for uncoated paper, which was exacerbated by the COVID-19 pandemic in 2020, Chair Kearns finds that the domestic industry is in a weakened condition and vulnerable to the likelihood of material injury by reason of subject imports. He observes that the domestic industry, while dramatically reducing capacity by *** percent over the period of review, experienced even greater declines in production and capacity utilization, which fell by *** percent and *** percent, respectively. Both indicators plummeted in 2020 during the pandemic, as did the industry's profitability. Several employment indicators, including production workers, wages paid, (Continued...)

As discussed above, we have found that cumulated subject imports would likely be significant in the reasonably foreseeable future if the orders under review were revoked. Given the domestic industry's large share of the market and the high degree of substitutability between subject imports and the domestic like product, the likely volume of cumulated subject imports would likely take market share from the domestic industry, resulting in declines in the domestic industry's production, shipments, and employment.

Further, the significant volume of low-priced subject imports would likely have adverse price effects on the domestic industry. To compete with low-priced subject imports, the domestic industry would have to either cut prices or forego needed price increases, or else lose sales and market share to subject imports. The likely volume of cumulated subject imports, coupled with their adverse price effects, would have a direct adverse impact on the industry's profitability and employment as well as its ability to raise capital and make and maintain necessary capital investments. Therefore, we find that revocation of the orders under review would likely have a significant impact on the domestic industry.

We have also considered the role of factors other than subject imports so as not to attribute likely injury from other factors to the subject imports. Nonsubject imports increased during the POR in terms of both volume and market share. Nonsubject import volume increased from *** short tons in 2015 to *** short tons in 2020 and was higher in interim 2021, at *** short tons, compared to interim 2020, at *** short tons.³²⁰ Nonsubject imports as a share of apparent U.S. consumption increased from *** percent in 2015 to *** percent in 2020; their share of apparent U.S. consumption was *** percent in interim 2020 and *** percent in interim 2021.³²¹ Although nonsubject imports are likely to remain in the U.S. market after revocation, the likely volume of subject imports would likely take market share from the domestic industry, given the domestic industry's large share of the U.S. market and the high degree of substitutability between subject imports and the domestic like product. Further, the AUVs of nonsubject imports were higher than the AUVs of subject imports throughout the POR.³²² We find that the continued presence of nonsubject imports in the U.S. market would

hours worked, and productivity also declined overall between 2015 and 2020. Although the domestic industry's performance began to recover in interim 2021, the industry still suffered from low capacity utilization, which remained lower at 77.3 percent than at the beginning of the period of review at 83.8 percent. In his view, the domestic industry will continue to face a secular decline in demand as it recovers from the pandemic, making it susceptible to the likely significant increase in subject imports and consequent adverse impact upon revocation of the orders.

³²⁰ CR/PR at Table I-18.

³²¹ CR/PR at Table C-1.

³²² CR/PR at Table C-1.

not preclude subject imports from taking market share from the domestic industry or forcing the domestic industry to lower prices in order to retain sales and market share.

The record also indicates that the secular decline in demand for uncoated paper is likely to continue. During the POR, apparent U.S. consumption for uncoated paper declined due to the replacement of uncoated paper by electronic media and, in 2020, the COVID-19 pandemic.³²³ Some firms expect that demand may recover somewhat from the 2020 lows caused by COVID-19, while other firms expect that increased remote work will continue to reduce demand for uncoated paper.³²⁴ The significant volume of low-priced subject imports that is likely after revocation would exacerbate the injury caused by declining demand on the domestic industry, by further reducing the industry's sales, increasing the industry's per-unit fixed overhead costs, and placing additional downward pressure on domestic prices. Given these considerations, we find that the likely effects attributable to the subject imports are distinguishable from any likely effects of decreasing demand if the orders were revoked.

In sum, we conclude that, if the antidumping and countervailing duty orders were revoked, cumulated subject imports from Australia, Brazil, China, Indonesia, and Portugal would likely have a significant impact on the domestic industry within a reasonably foreseeable time.

V. Conclusion

For the above reasons, we determine that revocation of the countervailing duty orders on uncoated paper from China and Indonesia and the antidumping duty orders on uncoated paper from Australia, Brazil, China, Indonesia, and Portugal would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

³²³ CR/PR at II-14, II-16-17, Table II-4.

³²⁴ CR/PR at II-15.

THE UNIVERSITY OF CHICAGO

DEPARTMENT OF CHEMISTRY

PHYSICAL CHEMISTRY

LABORATORY

CHICAGO, ILLINOIS

1950

REPORT

ON

THE

MEASUREMENT

OF

THE

HEAT

OF

FUSION

OF

ICE

AT

THE

TRIPLE

POINT

U.S. International Trade Commission

Washington, DC 20436
www.usitc.gov

Uncoated Paper from Australia, Brazil, China, Indonesia, and Portugal

Investigation Nos. 701-TA-528-529 and 731-TA-1264-1268 (Review)

Publication 5275



January 2022

0101 111

General Information

...

CONTENTS

	Page
Determinations	1
Views of the Commission	3
Part I: Introduction	I-1
Background	I-1
The original investigation	I-3
The first five-year review.....	I-3
The second five-year review.....	I-4
The third five-year review	I-4
The fourth five-year review	I-5
Previous and related investigations	I-6
Summary data	I-6
Statutory criteria	I-12
Organization of report	I-13
Commerce's reviews	I-14
Administrative reviews.....	I-14
Changed circumstances reviews	I-16
Scope rulings.....	I-16
Five-year reviews.....	I-16
The subject merchandise	I-17
Commerce's scope	I-17
Tariff treatment.....	I-17
The product	I-17
Description and applications.....	I-17
Manufacturing processes	I-21
Domestic like product issues.....	I-26
U.S. market participants	I-26
U.S. producers	I-26
U.S. importers.....	I-28

CONTENTS

Page

Part I: Introduction	Continued
U.S. purchasers.....	I-29
Apparent U.S. consumption	I-30
U.S. market shares	I-32
Part II: Conditions of competition in the U.S. market	II-1
U.S. market characteristics.....	II-1
Channels of distribution	II-3
Geographic distribution	II-4
Supply and demand considerations.....	II-4
U.S. supply	II-4
U.S. demand	II-9
Substitutability issues.....	II-13
Factors affecting purchasing decisions.....	II-14
Purchase factor comparisons of domestic products, subject imports, and nonsubject imports	II-20
Comparison of U.S.-produced and imported potassium permanganate.....	II-22
Elasticity estimates.....	II-24
U.S. supply elasticity.....	II-24
U.S. demand elasticity	II-24
Substitution elasticity.....	II-25
Part III: Condition of the U.S. industry	III-1
Overview	III-1
Changes experienced by the industry	III-1
Anticipated changes in operations.....	III-2
U.S. production, capacity, and capacity utilization	III-2
Constraints on capacity	III-3
U.S. producer's U.S. shipments and exports.....	III-3

CONTENTS

Page

Part III: Condition of the U.S. industry	Continued
U.S. producer's inventories	III-9
U.S. producer's imports.....	III-10
U.S. employment, wages, and productivity	III-11
Financial experience of U.S. producer Carus	III-12
Background.....	III-12
Operations on potassium permanganate	III-12
Net sales	III-16
Cost of goods sold and gross profit or loss.....	III-18
SG&A expenses and operating income or loss.....	III-20
All other expenses and net income or loss	III-21
Variance analysis	III-21
Capital expenditures and research and development expenses	III-22
Assets and return on assets.....	III-23
Part IV: U.S. imports and the foreign industries	IV-1
U.S. imports.....	IV-1
Overview.....	IV-1
Imports from subject and nonsubject countries.....	IV-1
U.S. importers' imports subsequent to June 30, 2021	IV-3
U.S. importers' inventories	IV-4
The industry in China.....	IV-5
Overview.....	IV-5
Changes in operations	IV-7
Operations on potassium permanganate	IV-8
Alternative products.....	IV-11
Exports.....	IV-11
Third-country trade actions	IV-14

CONTENTS

Page

Part IV: U.S. imports and the foreign industries.....	Continued
Global market.....	IV-14
Part V: Pricing data.....	V-1
Factors affecting prices.....	V-1
Raw material costs.....	V-1
Transportation costs to the U.S. market.....	V-2
U.S. inland transportation costs.....	V-2
Pricing practices.....	V-2
Pricing methods.....	V-2
Sales terms and discounts.....	V-5
Price leadership.....	V-6
Price data.....	V-6
Price trends.....	V-9
Price comparisons.....	V-10
Prices in the U.S. market compared to non-U.S. markets.....	V-10
Appendixes	
A. Federal Register notices.....	A-1
B. List of hearing witnesses.....	B-1
C. Summary data.....	C-1
D. Likely effects of revocation.....	D-1
E. U.S. producer's and U.S. importers' U.S. shipments by source, grade, and period.....	E-1
F. U.S. imports, by source and by year.....	F-1
G. U.S. producer's and foreign producer's exports by grade and period.....	G-1

Note.—Information that would reveal confidential operations of individual concerns may not be published. Such information is identified by brackets in confidential reports and is deleted and replaced with asterisks (***) in public reports.

Part I: Introduction

Background

On February 1, 2021, the U.S. International Trade Commission (“Commission” or “USITC”) gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended (“the Act”),¹ that it had instituted reviews to determine whether revocation of the countervailing duty orders on uncoated paper from China and Indonesia and the antidumping duty orders on uncoated paper from Australia, Brazil, China, Indonesia, and Portugal would likely lead to the continuation or recurrence of material injury to a domestic industry.^{2 3} On May 7, 2021, the Commission determined that it would conduct full reviews pursuant to section 751(c)(5) of the Act.⁴ Table I-1 presents information relating to the background and schedule of these reviews:⁵

¹ 19 U.S.C. 1675(c).

² 86 FR 7734, February 1, 2021. All interested parties were requested to respond to this notice by submitting the information requested by the Commission.

³ In accordance with section 751(c) of the Act, the U.S. Department of Commerce (“Commerce”) published a notice of initiation of five-year reviews of the subject antidumping and countervailing duty orders. 86 FR 7709, February 1, 2021.

⁴ 86 FR 27650, May 21, 2021. The Commission found that both the domestic and respondent interested party group responses to its notice of institution were adequate.

⁵ The Commission’s notice of institution, notice to conduct full reviews, scheduling notice, and statement on adequacy are referenced in appendix A and may also be found at the Commission’s web site (internet address www.usitc.gov). Commissioners’ votes on whether to conduct expedited or full reviews may also be found at the web site. Appendix B is reserved for the witnesses appearing at the Commission’s hearing.

Table I-1

Uncoated paper: Information relating to the background and schedule of these reviews

Effective date	Action
March 3, 2016	Commerce's countervailing duty orders on uncoated paper from China and Indonesia (81 FR 11187) and antidumping duty orders on uncoated paper from Australia, Brazil, China, Indonesia, and Portugal (81 FR 11174)
February 1, 2021	Commission's institution of five-year reviews (86 FR 7734)
February 1, 2021	Commerce's initiation of five-year reviews (86 FR 7709)
May 7, 2021	Commission's determination to conduct full five-year reviews (86 FR 27650, May 21, 2021)
June 1, 2021	Commerce's final results of the expedited five-year review of the countervailing duty order on uncoated paper from Indonesia (86 FR 29243) and its final results of the expedited five-year reviews of the antidumping duty orders on uncoated paper from Australia, Brazil, China, Indonesia, and Portugal (86 FR 29248)
June 7, 2021	Commerce's final results of the expedited five-year review of the countervailing duty order on uncoated paper from China (86 FR 30260)
July 19, 2021	Commission's scheduling of the reviews (86 FR 39057, July 23, 2021)
November 18, 2021	Commission's hearing
January 11, 2022	Commission's vote
January 31, 2022	Commission's determinations and views

The original investigations

The original investigations resulted from petitions filed by United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union ("United Steelworkers" or "USW"), Pittsburgh, Pennsylvania; Domtar Corporation ("Domtar"), Ft. Mill, South Carolina; Finch Paper LLC ("Finch Paper"), Glen Falls, New York; P.H. Glatfelter Company ("Glatfelter"), York, Pennsylvania; and Packaging Corporation of America ("PCA"), Lake Forest, Illinois, alleging that an industry in the United States is materially injured and threatened with material injury by reason of subsidized imports of uncoated paper from China and Indonesia and less-than-fair-value ("LTFV") imports of uncoated paper from Australia, Brazil, China, Indonesia, and Portugal. Following notification of final determinations by Commerce that imports of uncoated paper from China and Indonesia were being subsidized and imports of uncoated paper from Australia, Brazil, China, Indonesia, and Portugal were sold at LTFV, the Commission determined on February 22, 2016, that a domestic industry was materially injured by reason of subsidized imports of uncoated paper from China and Indonesia and imports of uncoated paper from Australia, Brazil, China, Indonesia, and Portugal that were sold at LTFV.⁶ Commerce published the countervailing duty orders on subject imports of

⁶ Certain Uncoated Paper from Australia, Brazil, China, Indonesia, and Portugal Inv. Nos. 701-TA-528-529 and 731-TA-1264-1268 (Final), USITC Publication 4592, February 2016 ("Original publication"), p. 1.

uncoated paper from China and Indonesia and the antidumping duty orders on subject imports of uncoated paper from Australia, Brazil, China, Indonesia, and Portugal on March 3, 2016.⁷

Previous and related investigations

Uncoated paper that exactly meets the scope description of the item that is the subject of these five-year reviews has not been the subject of any prior countervailing or antidumping duty investigations in the United States. The Commission has conducted a number of previous import relief investigations on other paper merchandise, which are presented in table I-2.

⁷ 81 FR 11174 and 81 FR 11187, March 3, 2016.

CONFIDENTIAL

**Table I-2
Uncoated paper: Previous and related Commission proceedings**

Date	Number	Product / Country	Outcome of Original Investigation	Current Status
2005	701-TA-442	Certain Lined Paper School Supplies / India	Affirmative	Order continued after second review, March 6, 2018
2005	701-TA-443	Certain Lined Paper School Supplies / Indonesia	Affirmative	Order revoked after first review, August 31, 2012
2005	731-TA-1095	Certain Lined Paper School Supplies / China	Affirmative	Order continued after second review, March 6, 2018
2005	731-TA-1096	Certain Lined Paper School Supplies / India	Affirmative	Order continued after second review, March 6, 2018
2005	731-TA-1097	Certain Lined Paper School Supplies / Indonesia	Affirmative	Order revoked after first review, August 31, 2012
2006	701-TA-444	Coated Free Sheet Paper / China	Final Negative	---
2006	701-TA-445	Coated Free Sheet Paper / Indonesia	Final Negative	---
2006	701-TA-446	Coated Free Sheet Paper / Korea	Final Negative	---
2006	731-TA-1107	Coated Free Sheet Paper / China	Final Negative	---
2006	731-TA-1108	Coated Free Sheet Paper / Indonesia	Final Negative	---
2006	731-TA-1109	Coated Free Sheet Paper / Korea	Final Negative	---
2007	701-TA-451	Lightweight Thermal Paper / China	Affirmative	Order continued after second review, July 6, 2020
2007	731-TA-1126	Lightweight Thermal Paper / China	Affirmative	Order continued after second review, July 6, 2020
2007	731-TA-1127	Lightweight Thermal Paper / Germany	Affirmative	Order revoked after first review, January 30, 2015
2007	731-TA-1128	Lightweight Thermal Paper / Korea	Preliminary Negative	---
2009	701-TA-470	Certain Coated Paper Suitable for High-Quality Print Graphics Using Sheet-Fed Presses / China	Affirmative	Order continued after first review, January 6, 2017
2009	701-TA-471	Certain Coated Paper Suitable for High-Quality Print Graphics Using Sheet-Fed Presses / Indonesia	Affirmative	Order continued after first review, January 6, 2017
2009	731-TA-1169	Certain Coated Paper Suitable for High-Quality Print Graphics Using Sheet-Fed Presses / China	Affirmative	Order continued after first review, January 6, 2017
2009	731-TA-1170	Certain Coated Paper Suitable for High-Quality Print Graphics Using Sheet-Fed Presses / Indonesia	Affirmative	Order continued after first review, January 6, 2017

Table continued on next page

Table I-2 Continued

Uncoated paper: Previous and related Commission proceedings

Date	Number	Product / Country	Outcome of Original Investigation	Current Status
2015	701-TA-530	Supercalendered Paper / Canada	Affirmative	Order revoked by Commerce, August 3, 2015
2017	701-TA-584	Uncoated Groundwood Paper / Canada	Final Negative	---
2017	731-TA-1382	Uncoated Groundwood Paper / Canada	Final Negative	---
2020	731-TA-1546	Thermal Paper / Germany	Affirmative	Order issued on November 22, 2021
2020	731-TA-1547	Thermal Paper / Japan	Affirmative	Order issued on November 22, 2021
2020	731-TA-1548	Thermal Paper / Korea	Affirmative	Order issued on November 22, 2021
2020	731-TA-1549	Thermal Paper / Spain	Affirmative	Order issued on November 22, 2021

Note: "Date" refers to the year in which the investigation was instituted by the Commission. Decorative paper such as crepe paper and tissue paper are not included in this table.

Source: U.S. International Trade Commission publications and Federal Register notices.

Summary data

Table I-3 presents a summary of data from the original investigations and the current full five-year reviews. Apparent U.S. consumption, by quantity and value, were 44.1 percent and 44.2 percent lower, respectively, in 2020 than in 2014. U.S. producers' share of apparent U.S. consumption, by quantity, was *** percentage points higher in 2020 than in 2014, while subject imports' share of apparent U.S. consumption in 2020, by quantity, was *** percentage points lower than U.S. shipments of subject imports' share of apparent U.S. consumption in 2014. U.S. producers' production capacity and production were *** percent and *** percent lower, respectively, in 2020 than in 2014. The quantity of U.S. producers' U.S. shipments was *** percent lower in 2020 than in 2014, while the quantity of subject imports in 2020 was *** percent lower than the quantity of U.S. shipments of subject imports in 2014. The value of U.S. producers' U.S. shipments was *** percent lower in 2020 than in 2014, while the value of subject imports in 2020 was *** percent lower than the value of U.S. shipments of subject imports in 2014.

10/20/2021 10:40

Table I-3

Uncoated paper: Comparative data from the original investigations and first reviews

Quantity in short tons; value in 1,000 dollars; shares in percent

Item	Measure	2014,	2020
Apparent U.S. consumption	Quantity	4,466,557	2,496,623
U.S. producers market share	Share of quantity	79.4	85.9
Australia market share	Share of quantity	***	***
Brazil market share	Share of quantity	***	***
China market share	Share of quantity	***	0.1
Indonesia market share	Share of quantity	***	0.0
Portugal market share	Share of quantity	***	***
Subject market share	Share of quantity	17.0	***
Nonsubject market share	Share of quantity	3.5	***
Import market share	Share of quantity	20.6	14.1
Apparent U.S. consumption	Value	4,540,143	2,531,199
U.S. producers market share	Share of value	80.5	87.0
Australia market share	Share of value	***	***
Brazil market share	Share of value	***	***
China market share	Share of value	***	0.1
Indonesia market share	Share of value	***	0.0
Portugal market share	Share of value	***	***
Subject market share	Share of value	15.5	***
Nonsubject market share	Share of value	4.0	***
Import market share	Share of value	19.5	13.0

Table continued.

Table I-3 Continued

Uncoated paper: Comparative data from the original investigations and first reviews

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton

Item	Measure	2014	2020
Australia imports/shipments	Quantity	***	***
Australia imports/shipments	Value	***	***
Australia imports/shipments	Unit value	***	***
Brazil imports/shipments	Quantity	***	***
Brazil imports/shipments	Value	***	***
Brazil imports/shipments	Unit value	***	***
China imports/shipments	Quantity	***	1,390
China imports/shipments	Value	***	2,008
China imports/shipments	Unit value	***	1,445
Indonesia imports/shipments	Quantity	***	189
Indonesia imports/shipments	Value	***	144
Indonesia imports/shipments	Unit value	***	765
Portugal imports/shipments	Quantity	***	***
Portugal imports/shipments	Value	***	***
Portugal imports/shipments	Unit value	***	***
Subject imports/shipments	Quantity	***	***
Subject imports/shipments	Value	***	***
Subject imports/shipments	Unit value	***	***
Nonsubject imports/shipments	Quantity	***	***
Nonsubject imports/shipments	Value	***	***
Nonsubject imports/shipments	Unit value	***	***
All import source imports/shipments	Quantity	***	352,848
All import source imports/shipments	Value	***	329,808
All import source imports/shipments	Unit value	***	935

Table continued.

Table I-3 Continued

Uncoated paper: Comparative data from the original investigations and first reviews

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; ratios in percent

Item	Measure	2014	2020
Capacity	Quantity	***	3,476,598
Production	Quantity	***	2,208,112
Capacity utilization	Ratio	***	63.5
Producer U.S. shipments	Quantity	***	2,143,775
Producer U.S. shipments	Value	***	2,201,391
Producer U.S. shipments	Unit value	***	1,027
Producer inventories	Quantity	***	298,457
Producer inventory ratio to total shipments	Ratio	***	***
Production workers	Number	***	4,201
Hours worked	1,000 hours	***	9,413
Wages paid	Value	***	388,680
Hourly wages	Dollars per hour	\$***	\$41.29
Productivity	Short tons per 1,000 hours	***	235
Net sales	Quantity	***	2,261,139
Net sales	Value	***	2,305,494
Net sales	Unit value	***	1,020
Cost of goods sold	Value	***	2,044,220
Gross profit or (loss)	Value	***	261,274
SG&A expense	Value	***	101,791
Operating income or (loss)	Value	***	159,483
Unit COGS	Unit value	***	904
Unit operating income	Unit value	***	71
COGS/sales	Ratio	***	88.7
Operating income or (loss)/sales	Ratio	***	6.9

Source: Compiled data from Office of Investigations memorandum INV-TT-060 (April 26, 2021), official U.S import statistics, and responses to Commission questionnaires.

Note: Apparent U.S. consumption in 2014 is derived from U.S. shipments of imports, while apparent U.S. consumption in 2020 is derived from U.S. imports.

Note: Data for imports from China and Indonesia are based on official U.S. import statistics. Data for all other sources are based on data submitted in response to Commission questionnaires. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Statutory criteria

Section 751(c) of the Act requires Commerce and the Commission to conduct a review no later than five years after the issuance of an antidumping or countervailing duty order or the suspension of an investigation to determine whether revocation of the order or termination of the suspended investigation "would be likely to lead to continuation or recurrence of dumping or a countervailable subsidy (as the case may be) and of material injury."

Section 752(a) of the Act provides that in making its determination of likelihood of continuation or recurrence of material injury--

(1) IN GENERAL.-- . . . the Commission shall determine whether revocation of an order, or termination of a suspended investigation, would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time. The Commission shall consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the order is revoked or the suspended investigation is terminated. The Commission shall take into account--

(A) its prior injury determinations, including the volume, price effect, and impact of imports of the subject merchandise on the industry before the order was issued or the suspension agreement was accepted, (B) whether any improvement in the state of the industry is related to the order or the suspension agreement,

(C) whether the industry is vulnerable to material injury if the order is revoked or the suspension agreement is terminated, and

(D) in an antidumping proceeding . . . , (Commerce's findings) regarding duty absorption . . .

(2) VOLUME.--In evaluating the likely volume of imports of the subject merchandise if the order is revoked or the suspended investigation is terminated, the Commission shall consider whether the likely volume of imports of the subject merchandise would be significant if the order is revoked or the suspended investigation is terminated, either in absolute terms or relative to production or consumption in the United States. In so doing, the Commission shall consider all relevant economic factors, including--

(A) any likely increase in production capacity or existing unused production capacity in the exporting country,

(B) existing inventories of the subject merchandise, or likely increases in inventories,

(C) the existence of barriers to the importation of such merchandise into countries other than the United States, and

(D) the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products.

(3) PRICE.--In evaluating the likely price effects of imports of the subject merchandise if the order is revoked or the suspended investigation is terminated, the Commission shall consider whether--

(A) there is likely to be significant price underselling by imports of the subject merchandise as compared to domestic like products, and

(B) imports of the subject merchandise are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of domestic like products.

(4) IMPACT ON THE INDUSTRY.--In evaluating the likely impact of imports of the subject merchandise on the industry if the order is revoked or the suspended investigation is terminated, the Commission shall consider all relevant economic factors which are likely to have a bearing on the state of the industry in the United States, including, but not limited to--

(A) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity,

(B) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment, and

(C) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.

The Commission shall evaluate all such relevant economic factors . . . within the context of the business cycle and the conditions of competition that are distinctive to the affected industry.

Section 752(a)(6) of the Act states further that in making its determination, "the Commission may consider the magnitude of the margin of dumping or the magnitude of the net countervailable subsidy. If a countervailable subsidy is involved, the Commission shall consider information regarding the nature of the countervailable subsidy and whether the subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement."

Organization of report

Information obtained during the course of the reviews that relates to the statutory criteria is presented throughout this report. A summary of trade and financial data for uncoated paper as collected in the reviews is presented in appendix C. U.S. industry data are based on the questionnaire responses of eight U.S. producers of uncoated paper that are believed to have accounted for the vast majority of domestic production of uncoated paper in 2020. U.S. import data and related information are based on Commerce's official import statistics and the questionnaire responses of 17 U.S. importers of uncoated paper that are believed to have accounted for *** percent of subject imports during 2020. Foreign industry data and related information are based on the questionnaire responses of five producers of uncoated paper. One producer in Australia accounted for *** percent of total production; two producers in Brazil accounted for *** percent of total production; one producer in Indonesia accounted for *** percent of total production; one producer in Portugal accounted for *** percent of total production. The Commission did not receive a response to its questionnaire from producers in China.

Responses by U.S. producers, importers, purchasers, and foreign producers of uncoated paper to a series of questions concerning the significance of the existing antidumping and countervailing duty orders and the likely effects of revocation of such orders are presented in appendix D.

Commerce's reviews⁸

Administrative reviews

Commerce has completed two administrative reviews of the outstanding countervailing duty order on uncoated paper from Indonesia. Commerce has completed three administrative reviews of the outstanding antidumping duty order on uncoated paper from Brazil; three administrative reviews of the outstanding antidumping duty order on uncoated paper from Indonesia; and three administrative reviews of the outstanding antidumping duty order on uncoated paper from Portugal.⁹ There were no administrative reviews of the outstanding

⁸ Commerce has not conducted any scope rulings since the completion of the original investigations. In addition, Commerce has not issued any duty absorption findings or any company revocations since the imposition of the orders.

⁹ For previously reviewed or investigated companies not included in an administrative review, the cash deposit rate continues to be the company-specific rate published for the most recent period.

countervailing duty order on uncoated paper from China or on the outstanding antidumping duty orders on uncoated paper from Australia and China.

Brazil

Commerce has completed five antidumping duty administrative reviews with regard to subject imports of uncoated paper from Brazil. The results of the administrative reviews are shown in table I-4.

Table I-4
Uncoated paper: Administrative reviews of the antidumping duty order for Brazil

Date results published	Period of review	Producer or exporter	Margin (percent)
October 18, 2018, 83 FR 52804	August 27, 2015-February 28, 2017	Suzano Papel e Celulose S.A	18.80
October 23, 2019, 84 FR 56760	March 1, 2017-February 28, 2018	Suzano Papel e Celulose S.A	36.54
January 27, 2021, 86 FR 7254	March 1, 2018-February 28, 2019	Suzano Papel e Celulose S.A	32.31
January 27, 2021, 86 FR 7254	March 1, 2018-February 28, 2019	International Paper do Brasil Ltda. and International Paper Exportadora Ltda	20.80
October 7, 2021, 86 FR 55820	March 1, 2019-February 29, 2020	Suzano S.A	19.40

Source: Cited Federal Register notices.

Indonesia

Commerce has completed two countervailing duty administrative reviews and three antidumping duty administrative reviews with regard to subject imports of uncoated paper from Indonesia. The results of the administrative reviews are shown in tables I-5 and I-6.

Table I-5

Uncoated paper: Administrative reviews of the countervailing duty order for Indonesia

Date results published	Period of review	Producer or exporter	Margin, (percent)
November 14, 2018, 83 FR 56807	June 29, 2015-December 31, 2016	APRIL Fine Paper Macao Commercial Offshore Limited/PT Anugrah Kertas Utama/PT Riau Andalan Kertas/PT Intiguna Primatama/PT Riau Andalan Pulp & Paper/PT Esensindo Cipta Cemerlang/PT Sateri Viscose International/ PT ITCI Hutani Manunggal	11.73 (2015) 5.13 (2016)
January 29, 2020, 85 FR 5192	January 1, 2018-December 31, 2018	PT Anugerah Kertas Utama, PT Riau Andalan Kertas, APRIL Fine Paper Macao Offshore Limited, PT Asia Pacific Rayon, PT Sateri Viscose International, A P Fine Paper Trading (Hong Kong) Limited, and APRIL International Enterprise Pte. Ltd. (collectively, APRIL)	104.00

Source: Cited Federal Register notices.

**Table I-6
Uncoated paper: Administrative reviews of the antidumping duty order for Indonesia**

Date results published	Period of review	Producer or exporter	Margin (percent)
August 9, 2018, 83 FR 39410	August 26, 2015-February 28, 2017	PT Anugerah Kertas Utama/PT Riau Andalan Kertas/PT Sateri Viscose International/A P Fine Paper Trading (Hong Kong) Limited/APRIL Fine Paper Macao Offshore Limited (collectively, APRIL)	66.82
March 14, 2019, 84 FR 9294	March 1, 2017-February 28, 2018	PT Anugerah Kertas Utama, PT Riau Andalan Kertas, APRIL Fine Paper Macao Offshore Limited, PT Sateri Viscose International, and A P Fine Paper Trading (Hong Kong) Limited (collectively, APRIL)	66.82
January 6, 2020, 85 FR 496	March 1, 2018-February 28, 2019	APRIL Fine Paper Macao Offshore Limited, APRIL Fine Paper Trading Pte. Ltd., APRIL International Enterprise Pte. Ltd., A P Fine Paper Trading (Hong Kong) Limited, PT Anugerah Kertas Utama, PT Riau Andalan Kertas, PT Asia Pacific Rayon, and PT Sateri Viscose International (collectively, APRIL)	66.82

Source: Cited Federal Register notices.

Portugal

Commerce has completed five antidumping duty administrative reviews with regard to subject imports of uncoated paper from Portugal. The results of the administrative reviews are shown in table I-7.

PAGE NO

Table I-7

Uncoated paper: Administrative reviews of the antidumping duty order for Portugal

Date results published	Period of review	Producer or exporter	Margin (percent)
August 13, 2018, 83 FR 39982	August 26, 2015-February 28, 2017	The Navigator Company, S.A.	37.34
December 27, 2019, 84 FR 71376	March 1, 2017-February 28, 2018	The Navigator Company, S.A.	4.37
July 16, 2020, 85 FR 43208	August 26, 2015-February 28, 2017	The Navigator Company, S.A.	1.63
January 27, 2021, 86 FR 7269	March 1, 2018-February 28, 2019	The Navigator Company, S.A.	6.75
October 21, 2021, 86 FR 58251	March 1, 2019-February 29, 2020	The Navigator Company, S.A.	2.21

Source: Cited Federal Register notices.

Changed circumstances reviews

Commerce has conducted one changed circumstances review with respect to uncoated paper from Portugal. Commerce determined that the Navigator Company, S.A. and Navigator Fine Paper, S.A. (collectively "Navigator") is the successor-in-interest to Portucel S.A. and Portucel Sporcel Fine Paper, S.A. (collectively "Portucel") for the purposes of the antidumping duty order.

Anti-circumvention inquiries

On November 7, 2016, Commerce initiated an anti-circumvention inquiry to determine under the minor alterations provision whether uncoated paper with a GE brightness of 83 ±1% ("83 bright paper") is "altered in form or appearance in minor respects" from in-scope merchandise such that it may be considered subject to the countervailing duty orders on uncoated paper from China and Indonesia and the antidumping duty orders on uncoated paper from Australia, Brazil, China, Indonesia, and Portugal.¹⁰

On September 1, 2017, Commerce determined that imports of 83 bright paper, otherwise meeting the description of in-scope merchandise, constitute merchandise "altered in form or appearance in minor respects" from in-scope merchandise and are subject to the countervailing duty orders on uncoated paper from China and Indonesia and the antidumping duty orders on uncoated paper from Australia, Brazil, China, Indonesia, and Portugal.¹¹

¹⁰ 81 FR 78117, November 7, 2016.

¹¹ 82 FR 41610, September 1, 2017.

On October 18, 2019, Commerce initiated an anti-circumvention inquiry to determine whether certain imports of sheeter rolls of uncoated paper exported from Australia, Brazil, the People's Republic of China (China), and Indonesia, and completed by conversion into sheets of paper in the United States, are circumventing the countervailing duty orders on uncoated paper from China and Indonesia and the antidumping duty orders on uncoated paper from Australia, Brazil, China and Indonesia.¹² Commerce did not initiate an anti-circumvention inquiry on imports of uncoated paper rolls from Portugal. On December 8, 2021, Commerce issued its final determination that imports of uncoated paper rolls from Brazil, China, and Indonesia are circumventing the antidumping duty orders on uncoated paper from Brazil, China and Indonesia, and the countervailing duty orders on uncoated paper from China and Indonesia.¹³

Five-year reviews

Commerce has issued the final results of its expedited reviews with respect to all subject countries.¹⁴ Tables I-8 through I-14 present the countervailable subsidy margins and dumping margins calculated by Commerce in its original investigations and first five-year reviews.

Table I-8
Uncoated paper: Commerce's original and first five-year review dumping margins for producers/exporters in Australia

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
Paper Australia Pty. Ltd.	222.46	---
All others	138.87	---

Source: 81 FR 11174, March 3, 2016 and 86 FR 29248, June 1, 2021.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on uncoated paper from Australia would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 222.46 percent. Commerce did not present weighted-average dumping margins for individual companies or a country-wide dumping margin.

¹² 84 FR 55915, October 18, 2019.

¹³ 86 FR 71025, December 14, 2021.

¹⁴ 86 FR 29243 and 86 FR 29248, June 1, 2021. 86 FR 30260, June 7, 2021.

Table I-9

Uncoated paper: Commerce's original and first five-year review dumping margins for producers/exporters in Brazil

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
International Paper do Brasil Ltda. and International Paper Exportadora Ltda. (International Paper)	41.39	---
Suzano Papel e Celulose S.A.	22.37	---
All others	27.11	---

Source: 81 FR 11174, March 3, 2016 and 86 FR 29248, June 1, 2021.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on uncoated paper from Brazil would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 41.39 percent. Commerce did not present weighted-average dumping margins for any individual companies or a country-wide dumping margin.

Table I-10

Uncoated paper: Commerce's original and first five-year review countervailable subsidy margins for producers/exporters in China

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
Asia Symbol (Guangdong) Paper Co., Ltd. (AS Guangdong), Asia Symbol (Shandong) Pulp & Paper Co., Ltd. (AS Shandong), Asia Symbol (Guangdong) Omya Minerals Co., Ltd. (AS Omya), and Greenpoint Global Trading (Macao Commercial Offshore) Limited (Greenpoint) (collectively, Asia Symbol Companies)	7.23	7.23
Shandong Sun Paper Industry Joint Stock Co., Ltd. (Shandong Sun Paper), and Sun Paper (Hong Kong) Co., Ltd. (Sun Paper HK) (collectively, Sun Paper Companies)	176.75	176.75
UPM (China) Co. Ltd	176.75	176.75
All others	7.23	7.23

Source: 81 FR 11187, March 3, 2016 and 86 FR 30260, June 7, 2021.

Table I-11

Uncoated paper: Commerce's original and first five-year review dumping margins for producers/exporters in China

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
Greenpoint Global Trading (Macao Commercial Offshore) Ltd.	84.05	—
All others	149.00	—

Source: 81 FR 11174, March 3, 2016 and 86 FR 29248, June 1, 2021.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on uncoated paper from China would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 149.00 percent. Commerce did not present weighted-average dumping margins for any individual companies or a country-wide dumping margin.

Table I-12

Uncoated paper: Commerce's original and first five-year review countervailable subsidy margins for producers/exporters in Indonesia

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
PT Anugerah Kertas Utama, PT Riau Andalan Kertas, APRIL Fine Paper Macao Offshore Limited, PT Asia Pacific Rayon, PT Sateri Viscose International, A P Fine Paper Trading (Hong Kong) Limited, and APRIL International Enterprise Pte. Ltd	21.21	21.21
Great Champ Trading Limited	103.99	103.99
Indah Kiat Pulp & Paper TBK/Pabrik Kertas Tjiwi Kimia/PT Pindo Deli Pulp and Paper Mills	109.14	109.14
All others	21.21	21.21

Source: 81 FR 11187, March 3, 2016 and 86 FR 29243, June 1, 2021.

Table I-13

Uncoated paper: Commerce's original and first five-year review dumping margins for producers/exporters in Indonesia

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
PT Anugerah Kertas Utama, PT Riau Andalan Kertas, APRIL Fine Paper Macao Offshore Limited, PT Asia Pacific Rayon, PT Sateri Viscose International, A P Fine Paper Trading (Hong Kong) Limited, and APRIL International Enterprise Pte. Ltd	2.10	---
Indah Kiat Pulp & Paper TBK/Pabrik Kertas Tjiwi Kimia/PT Pindo Deli Pulp and Paper Mills	17.46	---
Great Champ Trading Limited	17.46	---
All others	2.10	---

Source: 81 FR 11174, March 3, 2016 and 86 FR 29248, June 1, 2021.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on uncoated paper from Indonesia would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 17.46 percent. Commerce did not present weighted-average dumping margins for any individual companies or a country-wide dumping margin.

Table I-14

Uncoated paper: Commerce's original and first five-year review dumping margins for producers/exporters in Portugal

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
The Navigator S.A. (previously Portucel)	7.80	---
All others	7.80	---

Source: 81 FR 11174, March 3, 2016 and 86 FR 29248, June 1, 2021.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on uncoated paper from Portugal would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 7.80 percent. Commerce did not present weighted-average dumping margins for any individual companies or a country-wide dumping margin.

The subject merchandise

Commerce's scope

In the current proceeding, Commerce has defined the scope as follows:

The scope of these orders includes uncoated paper in sheet form; weighing at least 40 grams per square meter but not more than 150 grams per square meter; that either is a white paper with a GE brightness level 3 of 85 or higher or is a colored paper; whether or not surface-decorated, printed (except as described below), embossed, perforated, or punched; irrespective of the smoothness of the surface; and irrespective of dimensions (Certain Uncoated Paper).

Certain Uncoated Paper includes (a) uncoated free sheet paper that meets this scope definition; (b) uncoated ground wood paper produced from bleached chemi-thermo-mechanical pulp (BCTMP) that meets this scope definition; and (c) any other uncoated paper that meets this scope definition regardless of the type of pulp used to produce the paper.

Specifically excluded from the scope are (1) paper printed with final content of printed text or graphics and (2) lined paper products, typically school supplies, composed of paper that incorporates straight horizontal and/or vertical lines that would make the paper unsuitable for copying or printing purposes. For purposes of this scope definition, paper shall be considered "printed with final content" where at least one side of the sheet has printed text and/or graphics that cover at least five percent of the surface area of the entire sheet.¹⁵

¹⁵ 86 FR 29243 and 86 FR 29248, June 1, 2021. 86 FR 30260, June 7, 2021.

Tariff treatment

Uncoated paper is currently imported under the following HTS subheadings: 4802.56.10, 4802.56.20, 4802.56.30, 4802.56.40, 4802.56.60, 4802.56.70, 4802.57.10, 4802.57.20, 4802.57.30, and 4802.57.40. Some imports of subject merchandise may also be currently imported under HTS subheadings 4802.62.10, 4802.62.20, 4802.62.30, 4802.62.50, 4802.62.61, 4802.69.10, 4802.69.20, and 4802.69.30, and statistical reporting numbers 4811.90.8050 and 4811.90.9080. Uncoated paper originating in Australia, Brazil, China, Indonesia, and Portugal imported into the U.S. market have a column 1-general duty rate of “free” for all relevant HTS subheadings. Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

HTS subheadings 4802.56.10, 4802.56.20, 4802.56.30, 4802.56.40, 4802.56.60, 4802.56.70, 4802.57.10, 4802.57.20, 4802.57.30, and 4802.57.40 were included in USTR’s third enumeration (“Tranche 3” or “List 3”) of products imported from China that became subject to the additional 10 percent ad valorem duties (annexes A and C of 83 FR 47974, on or after September 24, 2018) under Section 301 of the Trade Act of 1974.¹⁶ Escalation of this duty to 25 percent ad valorem was rescheduled from January 1, 2019 (annex B of 83 FR 47974)¹⁷ to March 2, 2019 (83 FR 65198),¹⁸ but was subsequently postponed until further notice,¹⁹ and then was implemented effective May 10, 2019 (84 FR 20459).²⁰ A subsequent modification was provided for subject goods produced in China prior to May 10, 2019 so that such goods were not subject to the escalated 25 percent duty as long as such goods were imported into the United States prior to June 1, 2019.^{21 22}

On February 5, 2020, USTR announced its determination to grant certain exclusion requests.²³ As of August 1, 2021, no exclusions were granted for any products under HTS subheadings 4802.56.10, 4802.56.20, 4802.56.30, 4802.56.40, 4802.56.60, 4802.56.70, 4802.57.10, 4802.57.20, 4802.57.30, and 4802.57.40.²⁴

¹⁶ 83 FR 47974, September 21, 2018.

¹⁷ *Ibid.*

¹⁸ 83 FR 65198, December 19, 2018.

¹⁹ 84 FR 7966, March 5, 2019.

²⁰ 84 FR 20459, May 9, 2019.

²¹ 84 FR 21892, May 15, 2019.

²² USTR proposed raising this additional duty from 25 percent to 30 percent on such products imported from China, on or after October 1, 2019 (Annex C – (List 3 - \$200 Billion Action), Part 1), 84 FR 46212, September 3, 2019.

²³ 85 FR 6674, February 5, 2020.

²⁴ HTS U.S. note 20, subchapter III, chapter 99; and USITC, “Harmonized Tariff Information,” August 8, 2021, https://www.usitc.gov/harmonized_tariff_information, retrieved August 18, 2021.

The product

Description and applications

Uncoated paper generally is used for office reprographics (copy and printer paper), books, instruction manuals, inserts, business forms, flyers, maps, and brochures. Uncoated paper is used in office and home printers and copiers and on sheet-fed printing presses, including but not limited to offset presses, digital color presses, color printers, and color copiers. Uncoated paper is sold to office superstores, club stores, retailers, paper merchants/distributors, and end users (such as commercial printers, schools, and offices).

Uncoated paper consists of uncoated paper in the form of finished sheets; weighing at least 40 grams per square meter ("gsm") but not more than 150 gsm; that either is a white paper with a GE²⁵ brightness level of 85 or higher or is a colored paper; whether or not surface decorated, printed, embossed, perforated, or punched; irrespective of the smoothness of the surface; and irrespective of dimensions. Uncoated paper consists of cut-size sheets and folio sheets. Cut-size sheets are produced in standard sizes of 8.5 x 11 inches (letter size), 8.5 x 14 inches (legal size), and 11 x 17 inches. Folio sheets are larger than cut-size sheets and have various dimensions; one common size of folio sheets is 17 x 22 inches. Most uncoated paper is sheeted and sold as finished sheets by paper producers; the remainder is sold in the form of sheeter rolls to independent converters, which sheet the rolls and sell the finished sheets. Important physical characteristics of uncoated paper include: (1) brightness, (2) basis weight, (3) opacity, (4) smoothness, and (5) caliper.

Brightness

Brightness is a measure of the paper's ability to reflect light. A GE Reflectance Scale is used for this measurement. The higher the brightness, the greater the contrast between the paper and the colors printed upon it. Brightness ranges from 1, a totally black grade, to 100, the brightest measured grade.

Basis weight

Basis weight, a traditional unit of measurement for the paper industry in the United States, is the weight in pounds of a ream of paper (500 sheets of paper) of a given size (the

²⁵ GE is short for General Electric, which invented one of the first machines to measure paper brightness.

basis).²⁶ The basis weight for office copy paper is predominately 20 pounds but can range from slightly less than this weight to more than 28 pounds.

Opacity

Opacity is a measure of the ability of a sheet of paper to have a printed image on one side without the image showing through to the other side. The measurement is expressed as a range from zero to 100 percent. The higher the value, the opaquer the paper; conversely, the lower the value, the more transparent the paper.

Smoothness

Paper smoothness refers to the amount of evenness the surface of the paper possesses. Factors that play into how smooth the finished paper is include the type of material used to make the paper and the surface treatment it receives in the later phases of production. Chief among the latter are how much wet pressing it receives, which types of coatings are used, and how much calendaring is performed. The most common method used to measure smoothness is the air leak test. This test measures the amount of time it takes for air to leak in between a smooth surface and that of the paper.²⁷

Caliper

Caliper is the thickness of a paper. Caliper is measured in thousandths of an inch and typically expressed as points (e.g., 10 points equals 0.010 inch, 8 points equals 0.008 inch, etc.).

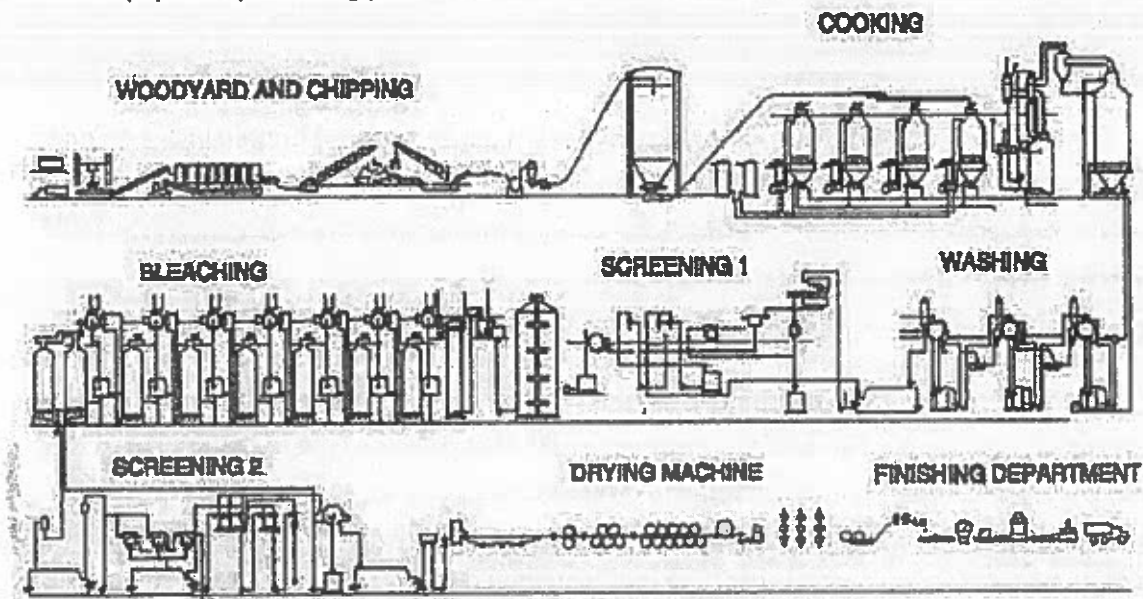
Manufacturing processes

Many U.S. producers of uncoated paper operate integrated manufacturing facilities, producing uncoated paper in one continuous process from the harvested log to the intermediate product (pulp) to the final paper product. The general production process is similar for all U.S. producers (figure I-1).

²⁶ On a metric basis, the weight of paper is measured in grams per square meter.

²⁷ "What is paper smoothness?" <https://navigator-business-optimizer.com/2016/03/what-is-paper-smoothness/>, retrieved April 7, 2021.

Figure I-1
Uncoated paper: Papermaking process



Source: "How is paper manufactured – uncoated paper,"
<https://jakethejeep.wordpress.com/2015/08/13/how-is-paper-manufactured-uncoated-paper/>, retrieved February 18, 2021.

The manufacturing process generally begins with the removal of the bark from logs in a debarking machine. The logs are then chipped into small uniformly sized chips in a chipper. The wood chips next undergo a chemical pulping process whereby they are cooked under pressure with water and chemicals in a digester cooking vessel to separate the cellulose fibers from the lignin (the glue that holds the fibers together) and other impurities. The resulting wood pulp is washed and bleached to attain a level of whiteness and brightness required for the grade of paper being produced and then refined to enable the wood fibers to mesh together and to increase their bonding properties. Different materials are added to the pulp, including kaolin clay and calcium carbonate for brightness, opacity, and smoothness, dyes for shade control, optical brighteners for whiteness, and sizing agents for moisture control. The exact proportions of these materials are determined by the specifications for the type of paper that is being produced. A large volume of water is also added.

The pulp mixture is 99.5 percent water as it enters the paper machine. A paper machine has three major parts—the base sheet forming section (the wet end), the press section, and the dryer section. The mixture is pumped out onto a continuously moving wire web that is usually oriented horizontally and which loops around rollers at both ends. As the wire web moves along, water drains through it, the fibers begin to bond, and a sheet (web) of paper begins to form on the wire. The web at this point has an 80 percent water content. The web of paper leaves the moving wire and enters the press section, where a set of steel rollers squeezes more water out of the web, reducing its water content to about 65 percent. The web then proceeds into the dryer section and passes over and under successive steam-heated drying cylinders. This drying process removes most of the remaining water from the web of paper.

The web may then undergo a calendaring process. A calendar is a set of steel rolls, stacked one on top of the other, through which the paper web is passed. The rolls apply heat and pressure to the paper, increasing the smoothness and gloss of the surface. The web of paper is wound onto large reels (jumbo rolls or parent rolls), which are transported to the finishing department where a slitter/rewinder unwinds and slits them into smaller width rolls (sheeter rolls) and rewinds them onto narrower reels. The widths of these narrower rolls are dictated by the sheet sizes into which they will be cut or by the width of the presses for which they are intended. At this point in the production process, any sheeter rolls that are to be sheeted by independent converters are wrapped and labeled for delivery to customers. The remaining sheeter rolls are processed on a sheeter, which cuts the rolls into sheets, performs a quality check of the surface of the paper, removes faulty sheets, counts and packages the sheets in ream quantities, and stacks them on pallets ready for delivery. Until the sheets and sheeter rolls actually leave the paper mill for the customer, they are kept in climate controlled areas and monitored carefully via inventory control software.

Domestic like product issues

In its original determinations, the Commission defined the domestic like product as consisting of uncoated paper that is coextensive with the scope of the investigations.²⁸ In its notice of institution in these current five-year reviews, the Commission solicited comments from interested parties regarding the appropriate domestic like product and domestic industry.²⁹ Six interested parties commented on the Commission's definition of the domestic like product. The domestic interested parties and respondents APP Group, Paper Australia, and

²⁸ Original publication, p. 7.

²⁹ 86 FR 7734, February 1, 2021.

Navigator do not contest the definition of the domestic like product as outlined in the Commission's notice of institution.³⁰ Respondent International Paper does not take a position on the definition of the domestic like product.³¹ Respondent Suzano did not address the issues relating to the domestic like product definition.³² No party requested that the Commission collect data concerning other possible domestic like products in their comments on the Commission's draft questionnaires and did not discuss the Commission's definition of the domestic like product in their prehearing or posthearing briefs.³³

U.S. market participants

U.S. producers

During the original investigations, ten firms supplied the Commission with information on their U.S. operations with respect to uncoated paper. These firms accounted for the vast majority of U.S. production of uncoated paper in 2014.³⁴ In these current proceedings, the Commission issued U.S. producers' questionnaires to 25 firms, eight of which provided the Commission with information on their uncoated paper operations. These firms are believed to account for the vast majority of U.S. production of uncoated paper in 2020. Presented in table I-15 is a list of domestic producers of uncoated paper and each company's position on continuation of the orders, production locations, related and/or affiliated firms, and share of reported U.S. production of uncoated paper in 2020.

³⁰ Substantive response of the domestic interested parties, p. 24; substantive response of respondent APP, p. 8; substantive response of respondent Paper Australia, p. 16; and substantive response of respondent Navigator, p. 25.

³¹ Substantive response of respondent International Paper do Brasil Ltda. and International Paper Exportadora Ltda, p. 11.

³² Substantive response of respondent Suzano S.A., p. 7.

³³ Comments on the draft questionnaires were filed on behalf of the domestic interested parties and respondent interested parties Navigator and Paper Australia.

³⁴ The ten U.S. producers that supplied the Commission with usable questionnaire information during the original investigations were: American Eagle, Boise, Domtar, Finch Paper, Georgia-Pacific, Glatfelter, International Paper, Neenah Paper, Performance Office Papers, and Summit Lake.

Table I-15

Uncoated paper: U.S. producers, positions on orders, U.S. production locations, and shares of reported U.S. production, 2020

Share in percent

Firm	Position on orders	Production location(s)	Share of production
Boise	***	International Falls, MN Jackson, AL	***
Domtar	***	Kingsport, TN Hawesville, KY Bennettsville, SC Ashdown, AR Johnsonberg, PA Rothschild, WI	***
Finch Paper	***	Glens Falls, NY	***
Georgia-Pacific	***	Zachary, LA Camas, WA	***
International Paper	***	Eastover, SC Selma, AL Ticonderoga, NY Georgetown, SC Sumter, SC	***
NORPAC	***	Longview, WA	***
Performance Office Paper	***	Lakeville, MN	***
Pixelle	***	Spring Grove, PA Chillicothe, OH	***
All firms	Various	Various	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Effective October 1, 2021, International Paper's communications paper business, which includes uncoated paper, has been spun off into a new publicly traded company, Sylvamo. *Introducing Sylvamo*, <https://www.internationalpaper.com/newsroom/introducing-sylvamo>, accessed October 4, 2021.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "—".

As indicated in table I-16, two U.S. producers are related to foreign producers of the subject merchandise and none are related to U.S. importers of the subject merchandise. In addition, as discussed in greater detail in Part III, one U.S. producer (***) directly imports uncoated paper and no producer purchased uncoated paper from U.S. importers.

Table I-16
Uncoated paper: U.S. producers' ownership, related and/or affiliated firms

Reporting firm	Relationship type and related firm	Details of relationship
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. importers

In the original investigations, 30 firms supplied the Commission with usable information on their operations involving the importation of uncoated paper, accounting for the following shares of the individual country's subject imports (as a share of official U.S. import statistics) in 2014 under HTS subheadings 4802.56 and 4802.57.³⁵

- All or virtually all of the subject imports from Australia;
- More than 95 percent of the subject imports from Brazil;
- Approximately 81 percent of the subject imports from China;
- Approximately 78 percent of the subject imports from Indonesia;
- All or virtually all of the subject imports from Portugal; and
- Approximately 79 percent of the subject imports from nonsubject sources.

Of the responding U.S. importers, *** were domestic producers: ***.

³⁵ Original publication, p. IV-1.

Table I-17 lists all responding U.S. importers of uncoated paper from subject sources and other sources, their locations, and their shares of U.S. imports in 2020.

Table I-17
Uncoated paper: U.S. importers, their headquarters, and shares of imports in 2020

Shares in percent

Firm	Headquarters	Subject sources	Nonsubject sources	All import sources
3A Press	Lajas, PR	***	***	***
Central National	Purchase, NY	***	***	***
Charta Global	Anaheim, CA	***	***	***
DD Office	Los Angeles, CA	***	***	***
Distribuidora Blanco	San Juan, PR	***	***	***
Domtar	Fort Mill, SC	***	***	***
Marubeni	New York, NY	***	***	***
Mondi Paper	Wien, Austria	***	***	***
Navigator	Norwalk, CT	***	***	***
Paper 360	Ontario, CA	***	***	***
Paper Products Marketing	Portland, OR	***	***	***
Perez Trading	Miami, FL	***	***	***
Roxcel	Greenville, SC	***	***	***
Shinsei	Torrance, CA	***	***	***
Simon Miller	Newtown Square, PA	***	***	***
Suzano	George Town, Cayman Islands,	***	***	***
UPM-Hymene	Naperville, IL	***	***	***
All firms	Various	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeros, null values, and undefined calculations are suppressed and shown as "---".

In the current proceedings, the Commission issued U.S. importers' questionnaires to 110 firms believed to be importers of uncoated paper and to all U.S. producers of uncoated paper. Usable questionnaire responses were received from 17 firms, representing *** percent of U.S. imports from Brazil and *** percent of U.S. imports from Portugal in 2020.³⁶ Responding U.S. importers reported imports from Australia and China only in 2015, representing *** percent and *** percent of imports from those sources, respectively. Responding firms *** from Indonesia in 2015 and 2018, accounting for *** and *** percent of imports from Indonesia in those years, respectively. Table I-17 lists all responding U.S. importers of uncoated paper from subject sources and other sources, their locations, and their shares of U.S. imports in 2020.

U.S. purchasers

The Commission received 20 usable questionnaire responses from firms that have purchased uncoated paper since January 2015.^{37 38 39} Thirteen responding purchasers reported that they are distributors, two reported that they are end users, five reported that they are retailers, and two reported "other" including ***. In general, responding purchasers were located in all regions of the United States including Puerto Rico. The largest purchasers of uncoated paper are (***). These firms' purchases accounted for *** percent of the total quantity reported by responding purchasers in 2020, with volume equivalent to *** percent of apparent U.S. consumption of uncoated paper in 2020.

³⁶ The coverage percentage of imports from Portugal is *** percent because, *** Email from ***, October 22, 2021.

³⁷ One firm (***) did not respond to most questions. ***.

³⁸ Of the 20 responding purchasers, 19 purchased domestic uncoated paper, 0 purchased imports from Australia, 8 purchased imports from Brazil, 2 purchased imports from China, 2 purchased imports from Indonesia, 11 purchased imports from Portugal, and 13 purchased imports from other sources.

³⁹ Purchaser questionnaires were provided by ***.

Apparent U.S. consumption

Table I-18 and figure I-2 present data on apparent U.S. consumption for uncoated paper. Apparent U.S. consumption by quantity, decreased in each year during 2015-20, ending 38.0 percent lower in 2020 than in 2015.⁴⁰ The majority of the decrease occurred from 2019-20, when apparent U.S. consumption decreased by 26.1 percent. It was 0.9 percent higher in January-June ("interim") 2021 than in interim 2020. The quantity of U.S. producers' U.S. shipments decreased by 36.7 percent during 2015-20, with the largest year-to-year decrease occurring from 2019 to 2020.⁴¹ It was 3.0 percent lower in interim 2021 than in interim 2020. U.S. imports from subject sources decreased by *** percent during 2015-20, with the majority of the decrease occurring from 2015 to 2017.⁴² It was *** percent higher in interim 2021 than in interim 2020. The decrease during 2015-20 is largely a result of U.S. imports from Indonesia decreasing by 89.7 percent during 2015-17 and nearly exiting the market by 2020, imports from Australia, as indicated by questionnaire responses, ***, and imports from China decreasing by 96.2 percent during 2015-20. The quantity of nonsubject imports increased by *** percent during 2015-19, but then decreased by *** percent in 2020, ending *** percent higher in 2020 than in 2015. It was *** percent higher in interim 2021 than in interim 2020. The value of apparent U.S. consumption fluctuated during 2015-20, decreasing by 9.9 percent from 2015 to 2017, then increasing by 2.5 percent from 2017 to 2019, and finally decreasing by 27.8 percent from 2019 to 2020, ending 33.3 percent lower in 2020 than in 2015. Apparent U.S. consumption, by value, was 1.1 percent lower in interim 2021 than in interim 2020.

⁴⁰ See part II for additional information on demand factors.

⁴¹ See part III for additional information on U.S. producers' U.S. shipments.

⁴² The quantities of U.S. imports from each subject source were lower in 2020 than in 2015. See part IV for additional information on U.S. imports.

Table I-18
Uncoated paper: Apparent U.S. consumption, by source and period

Quantity in short tons; value in 1,000 dollars

Source	Measure	2015	2016	2017
U.S. producers	Quantity	3,388,795	3,328,741	3,258,741
Australia	Quantity	***	***	***
Brazil	Quantity	***	***	***
China	Quantity	36,241	732	604
Indonesia	Quantity	148,520	43,339	15,317
Portugal	Quantity	***	***	***
Subject sources	Quantity	***	***	***
Nonsubject sources	Quantity	***	***	***
All import sources	Quantity	639,430	433,469	421,441
All sources	Quantity	4,028,225	3,762,210	3,680,182
U.S. producers	Value	3,213,635	3,158,395	3,041,065
Australia	Value	***	***	***
Brazil	Value	***	***	***
China	Value	29,394	901	825
Indonesia	Value	129,380	40,944	13,453
Portugal	Value	***	***	***
Subject sources	Value	***	***	***
Nonsubject sources	Value	***	***	***
All import sources	Value	581,031	397,245	378,447
All sources	Value	3,794,666	3,555,640	3,419,512

Table continued.

Table I-18 Continued
Uncoated paper: Apparent U.S. consumption, by source and period

Quantity in short tons; value in 1,000 dollars

Source	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
U.S. producers	Quantity	3,192,941	2,951,601	2,143,775	1,087,240	1,054,724
Australia	Quantity	***	***	***	***	***
Brazil	Quantity	***	***	***	***	***
China	Quantity	461	2,462	1,390	1,138	58
Indonesia	Quantity	12,280	21,749	189	189	---
Portugal	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	393,654	425,298	352,848	171,522	215,852
All sources	Quantity	3,586,595	3,376,899	2,496,623	1,258,762	1,270,576
U.S. producers	Value	3,112,681	3,087,613	2,201,391	1,122,490	1,076,026
Australia	Value	***	***	***	***	***
Brazil	Value	***	***	***	***	***
China	Value	627	2,868	2,008	1,543	211
Indonesia	Value	11,657	19,449	144	144	---
Portugal	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	362,071	417,544	329,808	160,354	192,385
All sources	Value	3,474,752	3,505,157	2,531,199	1,282,844	1,268,411

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using HTS statistical reporting numbers 4802.56.1000, 4802.56.2000, 4802.56.3000, 4802.56.4000, 4802.56.6000, 4802.56.7020, 4802.56.7040, 4802.56.7050, 4802.56.7090, 4802.57.1000, 4802.57.1020, 4802.57.1040, 4802.57.1090, 4802.57.2000, 4802.57.3000, 4802.57.4000, 4802.57.4020, 4802.57.4040, and 4802.57.4090, accessed October 21, 2021.

Note: Data for imports from China and Indonesia are based on official U.S. import statistics. Data for all other sources are based on questionnaire responses. Apparent U.S. consumption is calculated using U.S. imports. See Part IV for additional explanation on the presentation of import data. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure I-2
Uncoated paper: Apparent U.S. consumption, by source and period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using HTS statistical reporting numbers 4802.56.1000, 4802.56.2000, 4802.56.3000, 4802.56.4000, 4802.56.6000, 4802.56.7020, 4802.56.7040, 4802.56.7050, 4802.56.7090, 4802.57.1000, 4802.57.1020, 4802.57.1040, 4802.57.1090, 4802.57.2000, 4802.57.3000, 4802.57.4000, 4802.57.4020, 4802.57.4040, and 4802.57.4090, accessed October 21, 2021.

Note: Data for imports from China and Indonesia are based on official U.S. import statistics. Data for all other sources are based on data submitted in response to the Commission questionnaires. Apparent U.S. consumption is calculated using U.S. imports. See Part IV for additional explanation on the presentation of import data.

U.S. market shares

Table I-19 presents data on market share for uncoated paper. U.S. producers' market share, by quantity, increased from 84.1 percent in 2015 to 89.0 percent in 2018 and did not fall below 85.9 percent during 2018-20. It was 83.0 percent in interim 2021, compared to 86.4 percent in interim 2020. The market shares of U.S. imports from Brazil, Indonesia, and Portugal, by quantity, decreased by *** percentage points, 3.7 percentage points, and ***, respectively, during 2015-20. The market shares of U.S. imports from Brazil and Portugal, by quantity, were *** percent and *** percent, respectively, in interim 2021, compared to *** percent and *** percent, respectively, in interim 2020. The market share of U.S. imports from Indonesia was less than 0.05 percent in interim 2020 and zero percent in interim 2021. U.S. imports from Australia were present only in 2015, accounting for *** percent of market share, by quantity, while U.S. imports from China accounted for 0.9 percent of market share in 2015 and less than 0.05 percent of market share during in each year during 2016-20, except 2017, and in both interim periods. Overall, no single subject source accounted for more than *** percent of market share during 2015-20 and in both interim periods. Imports from Portugal held the highest market share among subject sources during 2015-20 and both interim periods.

Overall, the market share of subject imports, by quantity, decreased from *** percent to *** percent during 2015-18, but then increased to *** percent in 2020. The market share of subject imports, by quantity, was *** percent in interim 2021, compared to *** percent in interim 2020. The market share of imports from nonsubject sources, by quantity, increased from *** percent in 2015 to *** percent in 2020. It was *** percent in interim 2021, compared to *** percent in interim 2020.

Table I-19
Uncoated paper: Market shares, by source and period

Shares in percent

Source	Measure	2015	2016	2017
U.S. producers	Share of quantity	84.1	88.5	88.5
Australia	Share of quantity	***	***	***
Brazil	Share of quantity	***	***	***
China	Share of quantity	0.9	0.0	0.0
Indonesia	Share of quantity	3.7	1.2	0.4
Portugal	Share of quantity	***	***	***
Subject sources	Share of quantity	***	***	***
Nonsubject sources	Share of quantity	***	***	***
All import sources	Share of quantity	15.9	11.5	11.5
All sources	Share of quantity	100.0	100.0	100.0
U.S. producers	Share of value	84.7	88.8	88.9
Australia	Share of value	***	***	***
Brazil	Share of value	***	***	***
China	Share of value	0.8	0.0	0.0
Indonesia	Share of value	3.4	1.2	0.4
Portugal	Share of value	***	***	***
Subject sources	Share of value	***	***	***
Nonsubject sources	Share of value	***	***	***
All import sources	Share of value	15.3	11.2	11.1
All sources	Share of value	100.0	100.0	100.0

Table continued.

Table I-19 Continued
 Uncoated paper: Market shares, by source and period

Shares in percent

Source	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
U.S. producers	Share of quantity	89.0	87.4	85.9	86.4	83.0
Australia	Share of quantity	***	***	***	***	***
Brazil	Share of quantity	***	***	***	***	***
China	Share of quantity	0.0	0.1	0.1	0.1	0.0
Indonesia	Share of quantity	0.3	0.6	0.0	0.0	---
Portugal	Share of quantity	***	***	***	***	***
Subject sources	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	11.0	12.6	14.1	13.6	17.0
All sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
U.S. producers	Share of value	89.6	88.1	87.0	87.5	84.8
Australia	Share of value	***	***	***	***	***
Brazil	Share of value	***	***	***	***	***
China	Share of value	0.0	0.1	0.1	0.1	0.0
Indonesia	Share of value	0.3	0.6	0.0	0.0	---
Portugal	Share of value	***	***	***	***	***
Subject sources	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	10.4	11.9	13.0	12.5	15.2
All sources	Share of value	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics using HTS statistical reporting numbers 4802.56.1000, 4802.56.2000, 4802.56.3000, 4802.56.4000, 4802.56.6000, 4802.56.7020, 4802.56.7040, 4802.56.7050, 4802.56.7090, 4802.57.1000, 4802.57.1020, 4802.57.1040, 4802.57.1090, 4802.57.2000, 4802.57.3000, 4802.57.4000, 4802.57.4020, 4802.57.4040, and 4802.57.4090, accessed October 21, 2021.

Note: Data for imports from China and Indonesia are based on official U.S. import statistics. Data for all other sources are based on data submitted in response to the Commission questionnaires. See Part IV for additional explanation on the presentation of import data. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

1950

1951

1952

1953

Part II: Conditions of competition in the U.S. market

U.S. market characteristics

Uncoated paper is largely used in copy/printer machines by businesses, schools, governments, other institutions, and households. U.S. demand for uncoated paper has decreased as printed copies have been replaced by electronic media. In the original investigations, parties agreed that consumption of uncoated paper in the United States has fallen by more than 3 percent each year for during 1999-2014.¹ In 2020, the COVID-19 pandemic has caused major disruptions in offices and schools, reducing the use of uncoated paper.²

Apparent U.S. consumption of uncoated paper continued to decrease during 2015-20. Overall, apparent U.S. consumption in 2020 was *** percent lower than in 2015 (an average decline of *** percent per year). Much of the decline in uncoated paper apparent U.S. consumption occurred between 2019 and 2020. The decline from 2015 to 2019 was *** percent, a decline of *** percent per year.³ In response to the falling apparent U.S. consumption, a number of U.S. uncoated paper production facilities have stopped producing uncoated paper. See part III for details on closures and conversions of U.S. facilities.

Channels of distribution

Both U.S. producers and importers sold mainly to distributors, with retailers accounting most of their other sales, as shown in table II-1.

¹ Original publication p. II-1.

² Hearing transcript, pp. 32, 151 (Leblanc, Redondo).

³ Apparent U.S. consumption in interim 2021 was *** percent higher than apparent U.S. consumption in interim 2020.

Table II-1
Uncoated paper: Share of U.S. shipments by source, channel of distribution, and period

Shares in percent

Source	Channel	2015	2016	2017	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
United States	Distributors	***	***	***	***	***	***	***	***
United States	Retailers	***	***	***	***	***	***	***	***
United States	End users	***	***	***	***	***	***	***	***
Australia	Distributors	***	***	***	***	***	***	***	***
Australia	Retailers	***	***	***	***	***	***	***	***
Australia	End users	***	***	***	***	***	***	***	***
Brazil	Distributors	***	***	***	***	***	***	***	***
Brazil	Retailers	***	***	***	***	***	***	***	***
Brazil	End users	***	***	***	***	***	***	***	***
China	Distributors	***	***	***	***	***	***	***	***
China	Retailers	***	***	***	***	***	***	***	***
China	End users	***	***	***	***	***	***	***	***
Indonesia	Distributors	***	***	***	***	***	***	***	***
Indonesia	Retailers	***	***	***	***	***	***	***	***
Indonesia	End users	***	***	***	***	***	***	***	***
Portugal	Distributors	***	***	***	***	***	***	***	***
Portugal	Retailers	***	***	***	***	***	***	***	***
Portugal	End users	***	***	***	***	***	***	***	***
Subject sources	Distributors	***	***	***	***	***	***	***	***
Subject sources	Retailers	***	***	***	***	***	***	***	***
Subject sources	End users	***	***	***	***	***	***	***	***
Nonsubject sources	Distributors	***	***	***	***	***	***	***	***
Nonsubject sources	Retailers	***	***	***	***	***	***	***	***
Nonsubject sources	End users	***	***	***	***	***	***	***	***
All import sources	Distributors	***	***	***	***	***	***	***	***
All import sources	Retailers	***	***	***	***	***	***	***	***
All import sources	End users	***	***	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

PAGE NO

Geographic distribution

Most U.S. producers and importers from subject countries reported selling uncoated paper to all regions in the contiguous United States (table II-2). For U.S. producers, 18.2 percent of sales were within 100 miles of their production facility, 62.8 percent were between 101 and 1,000 miles, and 19.1 percent were over 1,000 miles. For importers *** percent of sales were within 100 miles of their U.S. point of shipment, *** percent between 101 and 1,000 miles, and *** percent over 1,000 miles.

Table II-2
Uncoated paper: Count of U.S. producers' and U.S. importers' geographic markets

Number of firms reporting

Region	U.S. producers	Australia	Brazil	China	Indonesia	Portugal	Subject sources
Northeast	8	***	***	1	2	***	7
Midwest	8	***	***	1	3	***	7
Southeast	8	***	***	1	2	***	6
Central Southwest	8	***	***	1	3	***	7
Mountain	7	***	***	1	2	***	6
Pacific Coast	7	***	***	4	4	***	9
Other	5	***	***	0	0	***	3
All regions (except Other)	7	***	***	1	2	***	6
Reporting firms	8	1	2	4	4	1	10

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Other U.S. markets include AK, HI, PR, and VI.

Supply and demand considerations

U.S. supply

Table II-3 provides a summary of the supply factors regarding uncoated paper from U.S. producers and from subject countries. COVID-19 has reduced demand for uncoated paper. Producers responded by reducing production; thus, capacity utilization was unusually low in 2020. In addition, firms idled equipment for relatively long periods of time, which led to some reductions in measured capacity in 2020. It is unclear how much of the change in both demand and supply caused by COVID-19 is permanent and how much is temporary, particularly given the continued uncertainty and disruptions from COVID-19. In order to provide information about market trends before COVID-19 became widespread, data for 2019 have also been included in table II-3. Discussions, however, will compare 2015 to 2020. COVID-19 has also caused logistics problems worldwide and created some supply disruptions. This is discussed in more detail in part V.

Since the subject uncoated paper includes only cut paper, capacity data were collected based on the paper sheeting equipment rather than the papermaking capacity. However, this sheeting capacity can only be used if the paper rolls are available to cut. Papermaking capacity, thus, may be a bottleneck that limits uncoated paper production. For example, Navigator stated that in its mills, paper machines are designed to always be the bottleneck while mills are designed to have excess sheeting capacity.^{4 5} Petitioners agree that papermaking equipment is very expensive and “cannot be turned on and off without incurring significant costs and risking damage to the equipment,”⁶ thus, there is a “huge” incentive “for producers to maximize their {paper making} capacity utilization.”⁷

⁴ Hearing transcript, pp. 204-205 (Redondo).

⁵ Both papermaking capacity and sheeting equipment may be used to produce products other than the subject uncoated paper. For more information on these products, please see “Domestic production” and “Subject imports”.

⁶ Hearing transcript, p. 28 (Molton).

⁷ Hearing transcript, p. 67 (Drake).

Most countries typically use A4 paper (8.27 x 11.7 inches), while the United States⁸ typically uses 8.5 x 11 inches (letter sized) paper.⁹ Paper webs designed to be used to produce A4 paper may result in increased waste if used to produce letter sized paper, or need to be adjusted to produce letter sized paper. Similarly, the equipment used to cut paper will need to be adjusted to change the size of paper produced. This adjustment adds a cost each time equipment is shifted between the two paper sizes and may reduce the efficiency of some foreign producers when they produce for the U.S. market. This cost, however, may be relatively small. Domestic producers estimate that the cost of “new gear” to change cut dimensions is about \$125,000 and changing over would require one 8 hour shift.¹⁰ Paper Australia reports that “it takes roughly two shifts to change over the one sheeter that can produce U.S.-cut letter size, 8-and-a-half by 11, and it takes two shifts again to go off it.”¹¹ In addition, respondents state that the weight and color (shades of white) of paper differs between markets and that this may require adjustments to the papermaking equipment.¹²

⁸ Other countries using letter sized are Canada, Chile, Colombia, Costa Rica, Mexico, Panama, Guatemala, the Dominican Republic, and the Philippines.

[https://en.wikipedia.org/wiki/Letter_\(paper_size\)](https://en.wikipedia.org/wiki/Letter_(paper_size)) retrieved July 13, 2021.

⁹ Standard sizes are letter size, 8.5 x 14 (legal size), 11 x 17 (tabloid size), and 17 x 11 (ledger size). <https://www.lifewire.com/north-american-paper-sheet-sizes-1078675>; and <https://www.papersizes.org/us-paper-sizes.htm>; both retrieved December 6, 2021. Pricing data in the original investigations were collected for letter size, legal size, and 23 x 35 inch size paper, and letter size paper accounted for *** percent of these data. Commission confidential views, p. 33.

¹⁰ Hearing transcript, p. 107 (Melton).

¹¹ Hearing transcript, p. 199 (Leith).

¹² Hearing transcript, p. 211 (Gupta). Paper produced for the Australian market also is a different basis weight than that sold in the United States, requiring adjustments in the papermaking machine. Hearing transcript, p. 199 (Leith).

Table II-3

Uncoated paper: Supply factors that affect the ability to increase shipments to the U.S. market, by country

Quantity in 1,000 short tons; ratio and share in percent; count is number of "yes" responses

Factor	Measure	United States	Australia	Brazil	China	Indonesia	Portugal	Subject suppliers
Sheeting capacity 2015	Quantity	4,347	***	***	0	***	***	***
Sheeting capacity 2019	Quantity	3,973	***	***	0	***	***	***
Sheeting capacity 2020	Quantity	3,477	***	***	0	***	***	***
Sheeting capacity utilization 2015	Ratio	83.8	***	***	0.0	***	***	***
Sheeting capacity utilization 2019	Ratio	80.5	***	***	0.0	***	***	***
Sheeting capacity utilization 2020	Ratio	63.5	***	***	0.0	***	***	***
Ending inventories 2015	Ratio	9.6	***	***	0.0	***	***	***
Ending inventories 2019	Ratio	12.4	***	***	0.0	***	***	***
Ending inventories 2020	Ratio	13.0	***	***	0.0	***	***	***
Home market 2019	Ratio	***	***	***	0.0	***	***	***
Home market 2020	Ratio	***	***	***	0.0	***	***	***
Non-US export markets 2019	Ratio	***	***	***	0.0	***	***	***
Non-US export markets 2020	Ratio	***	***	***	0.0	***	***	***
Ability to shift production	Count	6 of 8	***	***	0 of 0	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Responding U.S. producers accounted for a substantial majority of U.S. production of uncoated paper in 2020. Responding foreign producer/exporter firms accounted for virtually all of Australian uncoated paper production during 2020. Responding foreign producer/exporter firms accounted for virtually all of U.S. imports of uncoated paper from Brazil during 2020. No Chinese producer/exporter firms provided a questionnaire; public data on uncoated paper produced in China will be discussed below. Responding foreign producer/exporter firms accounted for more than half of U.S. imports of uncoated paper from Indonesia during 2019. (There were no imports from Indonesia in 2020). Responding foreign producer/exporter firms accounted for virtually all of U.S. imports of uncoated paper from Portugal during 2020. For additional data on the number of responding firms and their share of U.S. production and of U.S. imports from each subject country, please refer to Part I, "Summary Data and Data Sources."

Note: Capacity is sheeting capacity, not papermaking capacity.

NO

Domestic production

Based on available information, U.S. producers of uncoated paper have the ability to respond to changes in demand with small changes in the quantity of shipments of U.S.-produced uncoated paper to the U.S. market. The main factors that increase responsiveness of supply are the availability of unused sheeting capacity and the ability to shift production to or from alternate products. Factors mitigating responsiveness of supply include the bottleneck in the supply of paper that limits the use of the unused capacity, the closure of production facilities, limited inventories, and limited ability to shift shipments from alternate markets.

U.S. producers' sheeting capacity declined from 2015 to 2020, but production decreased by more than sheeting capacity, resulting in reduced sheeting capacity utilization.¹³ Reductions in consumption have led to closure or repurposing of U.S. papermaking equipment, resulting in a bottleneck limiting the availability of paper for use in paper sheeting equipment (discussed below under "Supply constraints"). As a result, U.S. producers are not able to respond to increased prices with increased quantities until the papermaking bottlenecks have been addressed.¹⁴ Major export markets included Canada and ***. Other products that producers reportedly can produce on the same equipment as uncoated paper are paper in roll format, heavier weight paper, and ***. Factors affecting U.S. producers' ability to shift production include demand, ***.

¹³ Georgia Pacific has stopped producing uncoated paper. Hearing transcript, p. 90 (Byers). Georgia Pacific reported it stopped producing office paper because demand was declining. Georgia-Pacific Announces Layoffs, Says It Will Stop Printing Office Paper <https://www.wabe.org/georgia-pacific-announces-layoffs-says-it-will-stop-printing-office-paper/>, retrieved October 1, 2021.

¹⁴ Domtar is restarting papermaking in Ashdown, Arkansas and intends to resume full operation by January 2022. This will increase Domtar's capacity by 7 percent. Hearing transcript, p. 29, 78 (Melton).

Subject imports from Australia

Based on available information, producers of uncoated paper from Australia have the ability to respond to changes in demand with moderate changes in the quantity of shipments of uncoated paper to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused sheeting capacity or inventories and an ability to shift shipments from alternate markets. Factors mitigating responsiveness of supply include possible bottlenecks, limited inventories,¹⁵ and limited ability to shift production to or from alternate products.¹⁶

Australian sheeting capacity is much lower than that of other subject countries. Between 2015 and 2020, sheeting capacity increased while production declined reducing capacity utilization. Australian papermaking equipment may be a bottleneck for its production of uncoated paper. Paper Australia reported that anti-dumping measures in Australia against dumped imports increased its share of the domestic market "from approximately 40 percent to almost 80 percent pre-pandemic" and exporting has become less attractive.¹⁷ Its largest export market is New Zealand.¹⁸

Subject imports from Brazil

Based on available information, producers of uncoated paper from Brazil have the ability to respond to changes in demand with moderate changes in the quantity of shipments of uncoated paper to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused sheeting capacity, ability to shift shipments from alternate markets, and ability to shift production to or from alternate products. Factors mitigating responsiveness of supply include possible bottlenecks and limited availability of inventories.

¹⁵ in the first half of 2021, "A miniscule amount of these inventories" (** short tons) were in 8 ½ x 11 inch format used in the United States. Australian Paper posthearing brief, p. 9.

¹⁶ Australian paper states that it is not able to switch production between uncoated paper and other products. Australian Paper posthearing brief, p. 9.

¹⁷ Hearing transcript, pp. 185-186, 198 (Loith).

¹⁸ Australian Paper posthearing brief, p. 6.

Both sheeting capacity and production declined between 2015 and 2020, however, production decreased by more than sheeting capacity, causing sheeting capacity utilization to fall. Brazilian papermaking equipment may be a bottleneck for its production of uncoated paper. Principal export markets include ***. Barriers to other markets included antidumping duties in Australia, Mexico, and Pakistan. Other products that responding foreign producers reportedly can produce on the same equipment as uncoated paper are ***. Factors affecting foreign producers' ability to shift production include ***.

Subject imports from China

No Chinese producer or exporter provided a questionnaire. IBIS World estimated that China produced 125 million tons of paper and paperboard in 2019 and 121 million tons in 2020. Of this, 23.2 percent was reported to be newsprint, writing paper, and other printing paper (a category that includes uncoated paper).^{19 20 ***.}²¹ China's large production of paper products indicates that it may be able to ship large amounts of uncoated paper to the United States.

Subject imports from Indonesia

Based on available information, producers of uncoated paper from Indonesia have the ability to respond to changes in demand with moderate changes in the quantity of shipments of uncoated paper to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of some unused sheeting capacity and the ability to shift shipments from alternate markets. Factors mitigating responsiveness of supply include possible bottlenecks, limited inventories,²² and no ability to shift production to or from alternative products.

¹⁹ IBIS World, "Paper and Paperboard Manufacturing in China," December 2020. IBIS World did not specify if this share reflected the share of value or the share of quantity, however, since the report mainly focused on value, it is likely that it is a share of value.

²⁰ These data are for paper making rather than sheeting capacity and therefore not comparable to the capacities reported for other countries.

²¹ Domestic posthearing brief, exhibit 27. ***.

²² APP reports that its inventories are in A4 sizes and thus not appropriate for the U.S. market. APP's posthearing brief, p, 7.

Indonesian sheeting capacity decreased from 2015 to 2020 while production increased. Indonesian papermaking equipment may be a bottleneck for its production of uncoated paper. Most Indonesian exports are sold to ***. Indonesian exports are reported to have ***.

Subject imports from Portugal

Based on available information, producers of uncoated paper from Portugal have the ability to respond to changes in demand with moderate changes in the quantity of shipments of uncoated paper to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused sheeting capacity, ability to shift shipments from alternate markets, and ability to shift production to or from alternate products. Factors mitigating responsiveness of supply include possible bottlenecks and limited inventories.

Both Portuguese production and sheeting capacity decreased between 2015 and 2020, however, production decreased more. Portuguese papermaking equipment may be a bottleneck for its production of uncoated paper. The Portuguese producer's principal export markets are the EU²³ ***. It reported no barriers to any market other than the United States and reported that ***. The other product that responding the foreign producer reportedly can produce on the same equipment as uncoated paper is ***. Navigator reported that it did not measure its capacity by the availability of sheeting capacity but by its papermaking capacity. Navigator reported that its papermaking capacity is fully utilized and that it produces "products with higher margins that do not require sheeting capacity."²⁴ Navigator reported that in 2020 it "reduced this capacity all over to keep market share

²³ Hearing transcript, p. 152 (Redondo).

²⁴ Hearing transcript, p. 153 (Redondo).

{customers'} budgets"; *** reported that customers were put on "allocation dependent on mill booking status, especially in 2021;" *** has been unable to import from *** since anti-dumping duties were imposed; and *** reported that the antidumping duties reduced the availability of imports and since then U.S. mills have been shut down, this had led to shortages and allocations.

Most purchasers (14 of 19) reported that they had experienced supply constraints since January 1, 2015. Seven purchasers specifically listed allocations by domestic producers and two of these reported that all domestic producers are using allocations. The other purchasers reporting allocations did not specify if the sellers were domestic producers or importers. *** reported suppliers were ending relationships, declining new business, and failing to meet shipment commitments. Similarly, *** reported that it was on allocation or faced shortages from ***, that *** stopped selling to it because it "could not keep up with demand and wanted to supply closer geographically to the mill," International Paper declined to sell to it, and Domtar declined to sell to ***. None of the purchasers reporting supply constraints, specifically listed imports from any source as having constrained supply.

Navigator claims that "The supply shortage in the United States became more acute after the June 2021 end of the data collection period in the Commission's questionnaires. RISI reports that U.S. mills are asking purchasers to wait 12 to 26 weeks for deliveries because their order books are full."²⁸

New suppliers

Seven of 18 responding purchasers indicated that new suppliers entered the U.S. market since January 1, 2015, or that they expect additional entrants. Purchasers cited U.S. producer Norpac as well as foreign producers Ittihad Paper (UAE) and Seshasayee (India) as new suppliers. Others reported the use of suppliers that they had not used before but that were not new to the market.

²⁸ Hearing transcript, p. 151 (Redondo). Navigator posthearing brief exhibit 8b, which reports backlogs ranging from 90 days to 6 months.

stable.”²⁵ Navigator stated that “2020 was the first time ever in our company that we have shuttered paper machines because of lack of orders....Until that time, we had never had a single hour of commercial shutdown. ...We have reduced this capacity all over to keep market share stable.”²⁶

Imports from nonsubject sources

Nonsubject imports accounted for 62.4 percent of total U.S. imports in 2020.²⁷ The largest sources of nonsubject imports during January 2015 to June 2021 were Canada, Thailand, and Finland. Combined, these countries accounted for 62.5 percent of nonsubject imports in 2020.

Supply constraints

Four of 8 U.S. producers and 8 of 16 importers reported that they had experienced supply constraints since January 1, 2015. U.S. producers listed a variety of production constraints. ***, ***, ***, ***. Importers also listed a variety of supply constraints including: two importers reported a shortage of shipping container limits imports into the United States; *** was “unable to support their

²⁵ Hearing transcript, p. 159-160 (Redondo). Navigator reported that ***.

²⁶ Hearing transcript, pp. 159-160 (Redondo).

²⁷ These numbers are from official statistics for the value of HTS statistical reporting numbers

4802.56.1000, 4802.56.2000, 4802.56.3000, 4802.56.4000, 4802.56.6000, 4802.56.7020, 4802.56.7050, 4802.56.7090, 4802.57.1000, 4802.57.2000, 4802.57.3000, and 4802.57.4000

U.S. demand

Based on available information, the overall demand for uncoated paper is likely to experience small changes in response to changes in price. The main contributing factors are the limited range of substitute products and the small share of cost of uncoated paper for most businesses. While direct substitutes (e.g., other papers that may be used to produce printed material on printer/copiers) are limited, printing technology continues to face competition from electronic media. Demand for paper has fallen because information that would have been printed is increasingly transmitted and stored in electronic form.

End uses and cost share

U.S. demand for uncoated paper depends on the demand for printed paper materials that use uncoated paper. Reported end uses include office/personal/school copying and printing, books, business forms, instruction manuals, inserts, flyers, brochures, and maps. All 7 responding U.S. producers, all 12 responding importers, 16 of 19 responding purchasers, and all 5 responding foreign producers reported no changes in end uses. The changes in end uses reported were continued electronic substitution, reduced paper use, and regular substitution between coated and uncoated paper. The use of uncoated paper is declining as electronic media replaces information printed on paper, however, this change does not appear to be caused by the cost of paper but based on the convenience and availability of electronic media.

Because uncoated paper is basically an end use product (the printed material in which it is used is typically not sold on its own), firms were not asked to estimate average cost share in its end uses. However, the cost of paper is not likely to be an important determinant of the amount of paper purchased.²⁹

Business cycles

Two of 6 responding U.S. producers, 6 of 16 responding importers, and 9 of 19 responding purchasers indicated that the market was subject to business cycles or unusual conditions of competition. Specifically, firms reported higher demand during parts of the year resulting from the needs of schools and increased demand due to elections. Distinctive conditions of competition include capacity closures and declining demand combined with capital intensive production and a commodity like product.

²⁹ The original investigations included details about the cost share of paper in the total cost of printed/copied pages (which depends on the type of printer/copier). Original publication, pp. II-9-II-10.

Demand trends

During the adequacy phase of these investigations, U.S. producers reported that electronic media had been a major source of the decrease in demand for uncoated paper since January 1, 2015. The Commission therefore asked firms if electronic media had reduced demand for uncoated paper and by how much demand had declined because of electronic media (table II-4).³⁰ The majority of the responding firms (including all responding U.S. domestic and foreign producers) reported electronic media had reduced demand for paper in the United States. Most firms also reported electronic media had reduced demand in foreign markets as well. Firms were asked to explain the impact of electronic media, most reported a shift to electronic documents. A few firms reported that the shift to electronic documents had accelerated recently because of improvements in electronic media and or because of COVID-19.

³⁰ Some of the changes reported may include the effect of the COVID-19 pandemic. Since much of the adjustments to this pandemic led to increased use of electronic media for education and office work, the distinction between the increased use of electronic media and the pandemic is unclear.

Table II-4

Uncoated paper: Count of firms' responses regarding if electronic media had reduced domestic and foreign demand since January 1, 2015 and the average and range of reductions reported by the firms

"Yes"/"no" responses in number of firms

Market	Firm type	Electronic media caused demand to fall (no)	Electronic media caused demand to fall (yes)	Average percent decrease reported	Highest percent decrease reported	Lowest percent decrease reported
Domestic demand	U.S. producers	0	7	6.8	20.0	1.0
Domestic demand	Importers	1	13	5.8	20.0	1.5
Domestic demand	Purchasers	4	15	5.7	12.0	3.0
Domestic demand	Foreign producers	0	5	8.4	18.3	3.0
Foreign demand	U.S. producers	0	6	3.5	5.0	0.5
Foreign demand	Importers	1	11	5.5	20.0	1.0
Foreign demand	Purchasers	2	8	9.0	25.0	3.0
Foreign demand (home market)	Foreign producers	1	4	4.5	8.8	1.0
Foreign demand (other markets)	Foreign producers	1	3	9.9	16.8	3.0

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Not all firms that reported demand had fallen estimated how much it declined per year. The average is for firms that provided an estimate. Some of the larger values for year to year decrease may reflect the decrease between 2019 and 2020, rather than average decrease for the whole period.

Firms were also asked if they anticipated that electronic media would cause demand to decrease in the future and they were asked to estimate the percentage change in future demand from electronic media (table II-5). Some firms expected substitution out of uncoated paper to slow because uncoated paper cannot be replaced in some uses and because demand may rebound from the 2020 lows caused by COVID-19. Other firms expected that increased remote work will continue to reduce demand for uncoated paper.

Table II-5

Uncoated paper: Count of firms' responses regarding anticipated electronic media reducing domestic and foreign demand overall domestic and foreign demand and the average and range of reductions reported by the firms

"Yes"/"no" responses in number of firms

Market	Firm type	Electronic media caused demand to fall (yes)	Electronic media caused demand to fall (no)	Average percentage decrease reported	Highest percentage decrease reported	Lowest percentage decrease reported
Domestic demand	U.S. producers	0	7	4.2	5.0	2.0
Domestic demand	Importers	2	11	5.7	20.0	1.0
Domestic demand	Purchasers	4	13	5.4	10.0	3.0
Domestic demand	Foreign producers	1	4	4.5	8.0	2.5
Foreign demand	U.S. producers	0	6	3.7	5.0	1.0
Foreign demand	Importers	3	9	6.5	20.0	1.0
Foreign demand	Purchasers	2	9	6.2	10.0	3.0
Foreign demand (home market)	Foreign producers	3	2	3.0	5.0	1.0
Foreign demand (other markets)	Foreign producers	3	1	2.0	3.0	1.0

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Not all firms expecting demand to fall predicted how much it would decline per year. The average is for firms that provided an estimate.

Foreign producers report that worldwide demand for uncoated paper was falling by an estimated 0.8 percent per year between 2015 and 2019 and 13 percent from 2019 to 2020. Demand in less developed country markets was stronger than in the United States, with either growth or smaller declines in some regions: demand in Asia ***; limitations on internet in *** slowed the shift away from paper in ***; and demand in the Middle East and Africa grew by about 2 percent a year during 2015-19.

Firms (U.S. producers, importers, purchasers, and foreign producers) were also asked if factors other than electronic media had changed U.S. demand since 2015 and if they expected other factors to influence demand in the future (table II-6). Most of the firms providing details (23 of the 31) listed COVID-19 or the pandemic as having changed U.S. demand.³¹ Some firms

³¹ Two firms reported a demand factor that were clearly unrelated to COVID-19, including increased use in election years and economic recessions reduce demand. Firms also reported supply chain.

(continued...)

PAGE NO

reported how much COVID-19 had reduced demand, one stating it reduced demand 25 percent in one quarter and another reported that it reduced demand 17 percent from full year 2019 to 2020. Firms listed a number of reasons COVID-19 led to the reduction in uncoated paper demand, including COVID-19 reduced office employment, closed schools, and increased remote work. (See appendix D for producer, importer, and importer responses to questions on the impact of COVID-19). Finally, one firm expects that there will be less chance of a rebound in paper demand when the pandemic ends as people have become more accustomed to using the electronic format. The quantity of product 1 in the price data reflects the quarter-to-quarter impact of COVID-19 on sales of 8½ by 11 inch paper (sold by domestic producers and importers from subject countries) in 2020 and the first half of 2021 (see part V for a discussion of these data).

When asked if they anticipated any changes in demand other than those caused by electronic media answers varied, a number reported that they expected demand to recover from the low caused by COVID-19, while others expected lingering effects from COVID-19 and the changes it caused.

Table II-6
Uncoated paper: Count of firms' responses regarding anticipated electronic media reducing domestic and foreign demand overall domestic and foreign demand

Market	Firm type	Other factors caused demand changes (yes)	Other factors caused demand changes (no)	Other factors anticipated to cause demand changes (yes)	Other factors anticipated to cause demand changes (no)
Domestic demand	U.S. producers	2	5	3	5
Domestic demand	Importers	4	9	7	5
Domestic demand	Purchasers	4	14	4	14
Domestic demand	Foreign producers	0	5	3	2
Foreign demand	U.S. producers	2	4	2	4
Foreign demand	Importers	3	9	5	7
Foreign demand	Purchasers	3	8	4	7
Foreign demand (home market)	Foreign producers	1	4	2	3
Foreign demand (other markets)	Foreign producers	0	5	1	4

Source: Compiled from data submitted in response to Commission questionnaires.

availability problems, reduced employment, and increased work from home, that may or may not be due to COVID-19.

Substitute products

Direct substitutes for uncoated paper are limited, although other types of paper may sometimes be used for making copies.³² Print media, however, is being replaced by electronic media, which has reduced demand for uncoated paper. The decision to shift to electronic media may have little to do with the cost of uncoated paper; rather, it reflects the falling costs, increasing convenience, and expanded availability of electronic media.

Most firms, *** responding U.S. producers, 10 of 12 responding importers, 15 of 19 responding purchasers, and 4 of 5 responding foreign producers reported that there had been no change in substitutes for uncoated paper. Changes in substitutes that were reported included electronic media and coated paper or uncoated paper outside of the scope of the investigation which could be used to make copies.

Substitutability issues

This section will assess the degree to which U.S.-produced uncoated paper and imports of uncoated paper from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of uncoated paper from domestic and imported sources based on those factors. Based on available data, staff believes that there is a high degree of substitutability between domestically produced uncoated paper and uncoated paper imported from subject sources.³³ Factors contributing to this level of substitutability include quality,³⁴ availability,³⁵ and lead times for uncoated paper from inventory, some preference for particular country of origin or producers, similarities between

³² For example, ***. Navigator posthearing brief, exhibit 9.

³³ The degree of substitution between domestic and imported uncoated paper depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced uncoated paper to the uncoated paper imported from subject countries (or vice versa) when prices change. The degree of substitution may include such factors as relative prices (discounts/rebates), quality differences (e.g., grade standards, defect rates, etc.), and differences in sales conditions (e.g., lead times between order and delivery dates, reliability of supply, product services, etc.).

³⁴ Most purchasers reported that U.S. and subject imports were equal in quality meets industry standards for all but one subject country.

³⁵ Almost all purchasers rated availability and reliability of supply as very important factors, and in the initial investigation most purchasers reported that U.S. uncoated paper and uncoated paper from most subject countries were comparable for availability and reliability of supply. However, in the current investigations, purchasers typically rated U.S. product as superior to that from subject on availability and reliability of supply. This change may reflect the impact of the orders on the availability and reliability of supply of uncoated paper from subject countries and thus if the orders were removed, the difference between U.S. and subject imports for availability and reliability of supply would probably diminish.

domestically produced uncoated paper and uncoated paper imported from subject countries across multiple purchase factors, interchangeability between domestic and subject sources, and limited significant factors other than price.

Factors affecting purchasing decisions³⁶

Purchaser decisions based on source

As shown in table II-7, most purchasers and their customers either sometimes or never make purchasing decisions based on the producer or country of origin. Of the four purchasers that reported that they always make decisions based the manufacturer three reported reasons including: due to the orders; purchased based on quality (age of equipment, fiber, defects, consistency, and aesthetics) and capacity; and preferred supplier.

Table II-7
Uncoated paper: Count of purchasing decisions by purchaser or their customer, based on producer and country of origin

Firm making decision	Decision based on	Always	Usually	Sometimes	Never
Purchaser	Producer	4	4	7	4
Customer	Producer	0	2	11	5
Purchaser	Country	3	2	11	3
Customer	Country	0	2	10	5

Source: Compiled from data submitted in response to Commission questionnaires.

Importance of purchasing domestic product

Eleven of 16 responding purchasers reported that 80 percent or more of their purchases did not require purchasing U.S.-produced product. Eight reported that domestic product was required by law (for 2.5 to 15.0 percent of their purchases), 10 reported it was required by their customers (for 0.5 to 40.0 percent of their purchases), and 3 reported other preferences for domestic product. Reasons cited for preferring domestic product included: price, availability, and prefer domestic in order to have a consistent product that runs well in copiers.

Most important purchase factors

The most often cited top three factors firms consider in their purchasing decisions for uncoated paper were price (17 firms), quality (17 firms), and availability (17 firms) as shown in table II-8. Quality was the most frequently cited first-most important factor (cited by 9 firms),

³⁶ Nineteen purchasers indicated they had marketing/pricing knowledge of domestic product, 1 of product from Australia, 9 of Brazil, 4 of China, 4 of Indonesia, 11 of Portugal, and 10 of product from nonsubject countries.

followed by price (6 firms); availability was the most frequently reported second-most important factor (9 firms); and price was the most frequently reported third-most important factor (8 firms).

Table II-8
Uncoated paper: Count of ranking of factors used in purchasing decisions as reported by U.S. purchasers, by factor

Factor	First	Second	Third	Total
Price	6	3	8	17
Quality	9	4	4	17
Availability/consistent supply/reliability	3	9	5	17
Relationship	1	0	0	1
Credit/terms	0	2	0	2
Fiber source	0	0	1	1

Source: Compiled from data submitted in response to Commission questionnaires.

Purchasers responses to how frequently they purchase the lowest-priced product varied. Most firms reported that they always (5 of 19) or usually (7 of 19) purchase the lowest-priced product. Of the remaining, five purchasers reported that they sometimes purchase the lowest-priced product and two that they never purchase the lowest-priced product.

Importance of specified purchase factors

Purchasers were asked to rate the importance of 19 factors in their purchasing decisions (table II-9). The factors rated as "very important" by more than half of responding purchasers were availability (19); reliability of supply (18); quality meets industry standards and product consistency, (17 each) delivery time, price, and runnability (16 each); jamming/misfeeds (15); delivery terms (12); U.S. transportation costs (11); and quality exceeds industry standards (10). The only factor that more firms reported as unimportant than as very important was minimum quantity requirement.

11-10
 PAGE NO

Table II-9

Uncoated paper: Count of importance of purchase factors, as reported by U.S. purchasers, by factor

Factor	Very important	Somewhat important	Not important
Availability	19	0	0
Brightness	8	11	0
Delivery terms	12	4	2
Delivery time	16	3	0
Discounts offered	9	6	4
Jamming/Misfeeds	15	2	1
Minimum quantity requirements	1	14	3
Opacity	7	11	0
Packaging	8	9	1
Payment terms	7	10	2
Price	16	2	1
Product consistency	17	1	0
Product range	3	12	2
Quality meets industry standards	17	2	0
Quality exceeds industry standards	10	6	2
Reliability of supply	18	1	0
Runnability	16	3	0
Technical support/service	7	11	0
U.S. transportation costs	11	7	0

Source: Compiled from data submitted in response to Commission questionnaires.

Lead times

Uncoated paper is primarily sold from inventory. U.S. producers reported 70.2 percent of their commercial U.S. shipments came from inventories, with lead times averaging 4 days. The remaining 29.8 percent of their commercial U.S. shipments were produced-to-order, with lead times averaging 23 days. Importers reported *** percent of their commercial U.S. shipments came from inventories, with lead times averaging 5 days. The remaining *** percent of their commercial U.S. shipments were produced-to-order, with lead times averaging 93 days.³⁷

Supplier certification

Seven of 19 responding purchasers require their suppliers to become certified or qualified to sell uncoated paper to their firm. Purchasers reported that the time to qualify a new supplier ranged from 10 to 180 days. Two purchasers reported that foreign suppliers had failed in its attempt to qualify uncoated paper, or had lost its approved status since 2015. One reported that *** were not qualified (but did

³⁷ No importer reported shipments from foreign inventories.

not explain why) and one reported that Asian and Indonesian producers were not qualified because of low whiteness.³⁸

Minimum quality specifications

As can be seen from table II-10, most responding purchasers reported that domestically produced uncoated paper as well as uncoated paper from Australia and Brazil "always" met minimum quality specifications. All responding purchasers reported that product from Portugal and other nonsubject countries "always" or "usually" met minimum quality specifications. Most responding purchasers reported that product from Indonesia either "always" or "usually" met minimum quality specifications. No firms reported that Chinese suppliers "always" met minimum quality specifications, but most firms reported that Chinese suppliers "usually" met minimum quality specifications.

Table II-10
Uncoated paper: Count of firms' responses regarding suppliers' ability to meet minimum quality specifications, by source

Source of purchases	Always	Usually	Sometimes	Rarely or never	Don't Know
United States	11	8	0	0	0
Australia	2	1	0	0	14
Brazil	5	4	0	1	7
China	0	4	2	0	11
Indonesia	3	4	2	0	9
Portugal	6	6	0	0	5
Nonsubject sources	3	3	0	0	4

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Purchasers were asked how often domestically produced or imported uncoated paper meets minimum quality specifications for their own or their customers' uses.

Nineteen purchasers reported factors that determined quality of uncoated paper. The most common responses included: appearance of the paper (brightness, whiteness, and opacity); shape of the paper (thickness/caliper/weight, finish, smoothness, and curl); other paper attributes (no miscuts, non-dusting, consistency, and fiber source); paper functioning in copiers/printers (runnability, consistently runs in different types of machines, does not jam, and printability); and packaging.³⁹ One purchaser reported that industry standards are well established and there is little variation from mill to mill.

³⁸ No U.S. producer was reported to have been unable to certify or qualify.

³⁹ One firm reported that price determined quality and one that brightness and price determined quality.

Changes in purchasing patterns

Thirteen of 19 responding purchasers reported that they had purchased uncoated paper from subject sources before 2015. Of these 13 purchasers, 6 reported their purchases were unchanged, 3 reported discontinuing purchases of uncoated paper from subject countries because of the order, 2 reported reducing purchases of uncoated paper from subject countries because of the order, and 2 reported changes for other reasons. One of these reported discontinuing purchases from 3 countries, reducing purchases from Brazil, and increasing purchases from Portugal. The other reported purchasing based on quality, availability, and price.

Purchasers were asked about changes in their purchasing patterns from different sources since 2015 (table II-11). Purchasers increasing purchases of U.S. product attributed this to the orders, increased demand and "new programs." All firms reporting that they decreased purchases of U.S. uncoated paper reported this was due to declines in demand or ***.

Almost all firms reported that either they had decreased purchases or made no purchases of uncoated paper from Australia, China, and Indonesia, they explained these responses either as a result of the orders or because they changed the relationship with the supplier.⁴⁰ A number of firms reported increased purchases from Portugal and Brazil because of the orders, changing relationships, or increased demand. Others reported constant purchases from Brazil and Portugal because they are a good supplier at a good price or because the volumes that are purchased from these sources are small.

⁴⁰ While a small number of firms reported constant purchase levels from these countries, no firm explained why purchases from these countries were constant. The only firm reporting that their purchases from China fluctuated reported that ***.

Table II-11

Uncoated paper: Count of changes in purchase patterns from U.S., subject, and nonsubject countries

Source of purchases	Decreased	Increased	Constant	Fluctuated	Did not purchase
United States	3	5	10	1	0
Australia	1	0	0	0	15
Brazil	3	1	3	2	8
China	2	0	1	1	12
Indonesia	2	0	2	0	13
Portugal	0	5	5	1	5
Nonsubject sources	0	4	5	1	6
Sources unknown	0	0	1	1	7

Source: Compiled from data submitted in response to Commission questionnaires.

Purchase factor comparisons of domestic products, subject imports, and nonsubject imports

Purchasers were asked a number of questions comparing uncoated paper produced in the United States, subject countries, and nonsubject countries. First, purchasers were asked for a country-by-country comparison on the same 19 factors (table II-12) for which they were asked to rate the importance (table II-9). This section focus on the eight factors that 15 or more purchasers reported were very important, other factors are included in table II-12 and the footnotes. While most responding purchasers reported domestic and Australian uncoated paper were comparable for most factors (including factors rated as very important by 15 or more purchasers: jamming/misfeeds, price, product consistency, quality meets industry standards, and runnability). U.S. product was rated as superior to Australian by most responding purchasers in availability, delivery time, and reliability of supply (factors that 15 or more purchasers had rated as very important).⁴¹ Most purchasers rated U.S. and Brazilian uncoated paper to be comparable for most factors (including factors rated as very important by 15 or more purchasers: jamming/misfeeds, price, product consistency, quality meets industry standards, and runnability). For availability, delivery time, and reliability of supply, (factors that 15 of more purchasers had rated as very important) responses were mixed, a plurality of purchasers rated U.S. product as superior to Brazilian, however more firms rated product as comparable or U.S. product as inferior, than rated U.S. product superior.⁴² Responses by purchasers comparing U.S. and Chinese uncoated paper were more varied. Of the eight factors

⁴¹ U.S. uncoated paper was also rated as superior to Australian uncoated paper for product range and technical support/service.

⁴² U.S. uncoated paper rated as superior to Brazilian by a plurality of purchasers for product range and technical support/service.

reported as very important by most purchasers, most rated U.S. product as superior for availability and reliability of supply; most rated U.S. and Chinese products as comparable for quality meets industry standards and price; and two purchasers each reported U.S. product was superior and U.S. and Chinese product were comparable for delivery time, jamming misfeeds, product consistency, and runnability.⁴³ A plurality of purchasers rated U.S. and Indonesian product comparable for 11 factors (including factors rated as very important by most purchasers: deliver time, jamming/ misfeeds, price, quality meets industry standards, and runnability). For other factors rated as very important by most purchasers U.S. product was rated as superior for availability, and reliability of supply; and two purchasers each rated U.S. product as superior, U.S. and Indonesian product as comparable, and U.S. product as inferior on product consistency.⁴⁴ Purchasers rated U.S. and Portuguese product as comparable for 17 factors (including factors rated as very important by most purchasers: availability, jamming/misfeeds, price, product consistency, quality meets industry standards, and runnability). The other factors rated as very important by most purchasers were delivery time and reliability of supply. For delivery time, five firms each reported U.S. product was superior and U.S. and Portuguese product were comparable and for reliability of supply a plurality of firms reported U.S. product was superior.⁴⁵

Most or a plurality of purchasers reported that U.S. and nonsubject uncoated paper were comparable for 18 of the 19 factors (including all factors very important by most firms except availability). For availability, there was no consensus, with three firms each reporting U.S. product was superior, U.S. product was comparable, and U.S. product was inferior.

⁴³ A plurality rated Chinese product as superior for brightness and discounts offered. A plurality rated U.S. product as superior for payment terms, product terms, and technical support/services. Two purchasers each reported U.S. product was inferior and U.S. and Chinese product were comparable for delivery terms. For the remaining factors a plurality of the firms reported U.S. and Chinese products were comparable.

⁴⁴ Other factors not rated as comparable by a plurality of purchasers were discounts offered, product range, and technical support/service a plurality rated U.S. product as superior; brightness three firms rated U.S. and Indonesia as comparable and U.S. product as inferior; discounts offered, two firms each rated U.S. and Indonesia comparable and U.S. inferior; and minimum quantity requirements two purchasers each rated U.S. product as superior and U.S. and Indonesian product as comparable.

⁴⁵ The other only other factor that a plurality of purchasers did not report to be comparable was technical support for which most firms rated U.S. product as superior.

Table II-12

Uncoated paper: Count of purchasers' responses comparing U.S.-produced and imported product

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs Australia	3	2	0
Brightness	U.S. vs Australia	0	3	2
Delivery terms	U.S. vs Australia	1	4	0
Delivery time	U.S. vs Australia	3	2	0
Discounts offered	U.S. vs Australia	1	3	0
Jamming/Misfeeds	U.S. vs Australia	0	5	0
Minimum quantity requirements	U.S. vs Australia	1	3	0
Opacity	U.S. vs Australia	0	4	1
Packaging	U.S. vs Australia	0	5	0
Payment terms	U.S. vs Australia	0	4	1
Price	U.S. vs Australia	0	3	2
Product consistency	U.S. vs Australia	1	4	0
Product range	U.S. vs Australia	3	2	0
Quality meets industry standards	U.S. vs Australia	2	3	0
Quality exceeds industry standards	U.S. vs Australia	2	3	0
Reliability of supply	U.S. vs Australia	3	2	0
Runnability	U.S. vs Australia	1	4	0
Technical support/service	U.S. vs Australia	4	1	0
U.S. transportation costs	U.S. vs Australia	0	4	0

Table continued.

Table II-12 Continued

Uncoated paper: Count of purchasers' responses comparing U.S.-produced and imported product

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs Brazil	4	3	3
Brightness	U.S. vs Brazil	1	5	3
Delivery terms	U.S. vs Brazil	2	7	1
Delivery time	U.S. vs Brazil	4	4	2
Discounts offered	U.S. vs Brazil	2	6	0
Jamming/Misfeeds	U.S. vs Brazil	3	5	1
Minimum quantity requirements	U.S. vs Brazil	1	7	1
Opacity	U.S. vs Brazil	0	8	2
Packaging	U.S. vs Brazil	3	6	1
Payment terms	U.S. vs Brazil	2	8	0
Price	U.S. vs Brazil	0	6	4
Product consistency	U.S. vs Brazil	3	7	0
Product range	U.S. vs Brazil	4	3	3
Quality meets industry standards	U.S. vs Brazil	1	9	0
Quality exceeds industry standards	U.S. vs Brazil	3	6	1
Reliability of supply	U.S. vs Brazil	4	3	3
Runnability	U.S. vs Brazil	3	7	0
Technical support/service	U.S. vs Brazil	6	1	2
U.S. transportation costs	U.S. vs Brazil	1	8	0

Table continued.

Table II-12 Continued

Uncoated paper: Count of purchasers' responses comparing U.S.-produced and imported product

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs China	3	0	2
Brightness	U.S. vs China	1	2	3
Delivery terms	U.S. vs China	1	2	2
Delivery time	U.S. vs China	2	2	1
Discounts offered	U.S. vs China	1	1	2
Jamming/Misfeeds	U.S. vs China	2	2	1
Minimum quantity requirements	U.S. vs China	2	1	1
Opacity	U.S. vs China	1	4	1
Packaging	U.S. vs China	1	3	1
Payment terms	U.S. vs China	4	1	1
Price	U.S. vs China	0	3	2
Product consistency	U.S. vs China	2	2	1
Product range	U.S. vs China	4	0	1
Quality meets industry standards	U.S. vs China	1	4	1
Quality exceeds industry standards	U.S. vs China	2	3	1
Reliability of supply	U.S. vs China	3	1	1
Runnability	U.S. vs China	2	2	1
Technical support/service	U.S. vs China	4	0	1
U.S. transportation costs	U.S. vs China	0	4	1

Table continued.

Table II-12 Continued

Uncoated paper: Count of purchasers' responses comparing U.S.-produced and imported product

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs Indonesia	3	1	2
Brightness	U.S. vs Indonesia	1	3	3
Delivery terms	U.S. vs Indonesia	1	4	1
Delivery time	U.S. vs Indonesia	2	3	1
Discounts offered	U.S. vs Indonesia	1	2	2
Jamming/Misfeeds	U.S. vs Indonesia	2	3	1
Minimum quantity requirements	U.S. vs Indonesia	2	2	1
Opacity	U.S. vs Indonesia	1	5	1
Packaging	U.S. vs Indonesia	1	4	1
Payment terms	U.S. vs Indonesia	2	4	1
Price	U.S. vs Indonesia	0	4	2
Product consistency	U.S. vs Indonesia	2	2	2
Product range	U.S. vs Indonesia	3	2	1
Quality meets industry standards	U.S. vs Indonesia	1	4	2
Quality exceeds industry standards	U.S. vs Indonesia	2	3	2
Reliability of supply	U.S. vs Indonesia	3	1	2
Runnability	U.S. vs Indonesia	2	3	1
Technical support/service	U.S. vs Indonesia	3	2	1
U.S. transportation costs	U.S. vs Indonesia	0	5	1

Table continued.

PAGE NO

Table II-12 Continued

Uncoated paper: Count of purchasers' responses comparing U.S.-produced and imported product

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs Portugal	4	6	0
Brightness	U.S. vs Portugal	0	7	4
Delivery terms	U.S. vs Portugal	4	6	0
Delivery time	U.S. vs Portugal	5	5	0
Discounts offered	U.S. vs Portugal	2	7	0
Jamming/Misfeeds	U.S. vs Portugal	0	10	0
Minimum quantity requirements	U.S. vs Portugal	1	8	0
Opacity	U.S. vs Portugal	0	8	3
Packaging	U.S. vs Portugal	1	9	0
Payment terms	U.S. vs Portugal	2	9	0
Price	U.S. vs Portugal	0	6	4
Product consistency	U.S. vs Portugal	1	8	1
Product range	U.S. vs Portugal	4	5	1
Quality meets industry standards	U.S. vs Portugal	0	10	1
Quality exceeds industry standards	U.S. vs Portugal	1	8	2
Reliability of supply	U.S. vs Portugal	5	4	1
Runnability	U.S. vs Portugal	1	9	0
Technical support/service	U.S. vs Portugal	6	3	1
U.S. transportation costs	U.S. vs Portugal	1	9	0

Table continued.

Table II-12 Continued

Uncoated paper: Count of purchasers' responses comparing U.S.-produced and imported product

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. vs Nonsubject	3	3	3
Brightness	U.S. vs Nonsubject	1	6	2
Delivery terms	U.S. vs Nonsubject	2	6	1
Delivery time	U.S. vs Nonsubject	1	6	2
Discounts offered	U.S. vs Nonsubject	1	6	1
Jamming/Misfeeds	U.S. vs Nonsubject	1	7	0
Minimum quantity requirements	U.S. vs Nonsubject	2	6	0
Opacity	U.S. vs Nonsubject	0	9	0
Packaging	U.S. vs Nonsubject	0	9	0
Payment terms	U.S. vs Nonsubject	0	8	1
Price	U.S. vs Nonsubject	1	6	2
Product consistency	U.S. vs Nonsubject	0	9	0
Product range	U.S. vs Nonsubject	2	7	0
Quality meets industry standards	U.S. vs Nonsubject	0	9	0
Quality exceeds industry standards	U.S. vs Nonsubject	1	8	0
Reliability of supply	U.S. vs Nonsubject	3	4	1
Runnability	U.S. vs Nonsubject	0	9	0
Technical support/service	U.S. vs Nonsubject	3	5	1
U.S. transportation costs	U.S. vs Nonsubject	1	8	0

Source: Compiled from data submitted in response to Commission questionnaires.

Note: A rating of superior means that price/U.S. transportation cost is generally lower. For example, if a firm reported "U.S. superior," it meant that the U.S. product was generally priced lower than the imported product.

Comparison of U.S.-produced and imported uncoated paper

In order to determine whether U.S.-produced uncoated paper can generally be used in the same applications as imports from subject countries, U.S. producers, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in tables II-13 and 14, most producers reported products from all country pairs were always interchangeable and most importers reported that they were always or frequently interchangeable. Purchaser responses were more varied (table II-15). More of the responding purchasers reported always or frequently than frequently or sometimes when comparing U.S. and Australia, Australia and Brazil, Australia and Portugal, Brazil and Portugal, and Australia and nonsubject countries. An equal number of the responding purchasers reported always or frequently as frequently or sometimes when comparing Australia and China, Australia and Indonesia, Indonesia and Portugal, Brazil and nonsubject countries, and Portugal and nonsubject countries. More purchasers reported frequently or sometimes for the 11 other country pairs.

Interchangeability was reported to be limited by differences in quality (lower quality paper from some Asian sources may increase jamming and reduce print quality), inconsistency in product from China and Indonesia, sizing (***) paper is only available in 8 ½ by 11, but not legal or double letter size limiting the purchasers since purchasers typically want to purchase all their paper from the same producer to get an identical shade), and differences in brightness, whiteness, smoothness, shade, opacity, fiber source, and packaging. One purchaser reported product was sometimes interchangeable between U.S. and product from China, Indonesia, Portugal, and nonsubject countries due to differences in quality, sizing, opacity, and runnability; Australia product was superior to that from China or Indonesia on bulk and runnability; Brazilian product is superior to that from China or Indonesia on bulk runnability and brightness; Chinese product is inferior to that from Indonesia and Portugal; and Indonesia product is superior to Portuguese and nonsubject product on product range.

Table II-13

Uncoated paper: Count of U.S. producers reporting the interchangeability between uncoated paper produced in the United States and in other countries, by country pair

Count of U.S. producers

Country pair	Always	Frequently	Sometimes	Never
United States vs. Australia	5	1	0	0
United States vs. Brazil	5	1	0	0
United States vs. China	5	1	0	0
United States vs. Indonesia	5	2	0	0
United States vs. Portugal	5	1	0	0
Australia vs. Brazil	5	0	0	0
Australia vs. China	5	0	0	0
Australia vs. Indonesia	5	0	0	0
Australia vs. Portugal	5	0	0	0
Brazil vs. China	5	0	0	0
Brazil vs. Indonesia	5	0	0	0
Brazil vs. Portugal	5	0	0	0
China vs. Indonesia	5	0	0	0
China vs. Portugal	5	0	0	0
Indonesia vs. Portugal	5	0	0	0
United States vs. nonsubject	5	2	0	0
Australia vs. nonsubject	5	0	0	0
Brazil vs. nonsubject	5	0	0	0
China vs. nonsubject	5	0	0	0
Indonesia vs. nonsubject	5	0	0	0
Portugal vs. nonsubject	5	0	0	0

Source: Compiled from data submitted in response to Commission questionnaires.

Table II-14

Uncoated paper: Count of importers reporting the interchangeability between uncoated paper produced in the United States and in other countries, by country pair

Count of importers

Country pair	Always	Frequently	Sometimes	Never
United States vs. Australia	6	0	4	0
United States vs. Brazil	5	3	4	0
United States vs. China	4	4	3	1
United States vs. Indonesia	6	4	4	0
United States vs. Portugal	5	1	5	0
Australia vs. Brazil	6	1	4	0
Australia vs. China	4	2	4	0
Australia vs. Indonesia	6	2	4	0
Australia vs. Portugal	5	1	5	0
Brazil vs. China	4	2	3	0
Brazil vs. Indonesia	6	2	3	0
Brazil vs. Portugal	5	2	3	0
China vs. Indonesia	6	2	2	0
China vs. Portugal	4	1	4	0
Indonesia vs. Portugal	5	1	4	0
United States vs. nonsubject	6	5	4	0
Australia vs. nonsubject	6	2	4	0
Brazil vs. nonsubject	6	2	3	0
China vs. nonsubject	5	2	3	0
Indonesia vs. nonsubject	6	2	3	0
Portugal vs. nonsubject	6	1	4	0

Source: Compiled from data submitted in response to Commission questionnaires.

Table II-15

Uncoated paper: Count of purchasers reporting the interchangeability between uncoated paper produced in the United States and in other countries, by country pair

Count of purchasers

Country/pair	Always	Frequently	Sometimes	Never
United States vs. Australia	4	0	2	0
United States vs. Brazil	3	5	4	0
United States vs. China	1	2	6	1
United States vs. Indonesia	1	3	6	1
United States vs. Portugal	3	5	4	0
Australia vs. Brazil	3	1	1	0
Australia vs. China	2	1	2	0
Australia vs. Indonesia	2	1	2	0
Australia vs. Portugal	3	1	1	0
Brazil vs. China	2	1	3	0
Brazil vs. Indonesia	2	1	4	0
Brazil vs. Portugal	3	4	2	0
China vs. Indonesia	2	1	3	0
China vs. Portugal	2	1	3	0
Indonesia vs. Portugal	3	1	3	0
United States vs. nonsubject	4	5	3	0
Australia vs. nonsubject	2	2	0	1
Brazil vs. nonsubject	2	3	2	0
China vs. nonsubject	1	2	2	0
Indonesia vs. nonsubject	1	2	2	1
Portugal vs. nonsubject	2	2	2	1

Source: Compiled from data submitted in response to Commission questionnaires.

In addition, U.S. producers, importers, and purchasers were asked to assess how often differences other than price were significant in sales of uncoated paper from the United States, subject, or nonsubject countries. As seen in table II-16, all responding U.S. producers reported that there were either sometimes or never differences other than price for uncoated paper from all country pairs except between the United States and Indonesia. Importer responses were more varied, but most responded either sometimes or never for all country pairs except U.S. and Portugal, China and Portugal, and Portugal and other (in these most the importers responded always or frequently) (table II-17). Half or more purchasers reported that there were always or frequently differences other than price for all country pairs except China and Portugal, and all subject countries compared to nonsubject countries (table II-18).

Table II-16

Uncoated paper: Count of U.S. producers reporting the significance of differences other than price between uncoated paper produced in the United States and in other countries, by country pair

Count of U.S. producers

Country pair	Always	Frequently	Sometimes	Never
United States vs. Australia	0	0	3	3
United States vs. Brazil	0	0	3	3
United States vs. China	0	0	3	3
United States vs. Indonesia	1	0	3	3
United States vs. Portugal	0	0	3	3
Australia vs. Brazil	0	0	2	3
Australia vs. China	0	0	2	3
Australia vs. Indonesia	0	0	2	3
Australia vs. Portugal	0	0	2	3
Brazil vs. China	0	0	2	3
Brazil vs. Indonesia	0	0	2	3
Brazil vs. Portugal	0	0	2	3
China vs. Indonesia	0	0	2	3
China vs. Portugal	0	0	2	3
Indonesia vs. Portugal	0	0	2	3
United States vs. nonsubject	0	0	4	3
Australia vs. nonsubject	0	0	2	3
Brazil vs. nonsubject	0	0	2	3
China vs. nonsubject	0	0	2	3
Indonesia vs. nonsubject	0	0	2	3
Portugal vs. nonsubject	0	0	2	3

Source: Compiled from data submitted in response to Commission questionnaires.

PAGE NO

Table II-17

Uncoated paper: Count of importers reporting the significance of differences between uncoated paper produced in the United States and in other countries, by country pair

Count of importers

Country pair	Always	Frequently	Sometimes	Never
United States vs. Australia	2	1	3	3
United States vs. Brazil	2	2	4	2
United States vs. China	2	0	5	3
United States vs. Indonesia	2	0	6	4
United States vs. Portugal	2	3	2	2
Australia vs. Brazil	2	1	3	3
Australia vs. China	2	1	3	2
Australia vs. Indonesia	2	1	4	3
Australia vs. Portugal	2	2	3	2
Brazil vs. China	3	0	2	2
Brazil vs. Indonesia	2	1	3	3
Brazil vs. Portugal	2	1	3	2
China vs. Indonesia	2	0	4	2
China vs. Portugal	2	2	1	2
Indonesia vs. Portugal	2	1	2	3
United States vs. nonsubject	3	0	8	2
Australia vs. nonsubject	3	1	4	2
Brazil vs. nonsubject	3	1	3	2
China vs. nonsubject	3	0	4	1
Indonesia vs. nonsubject	3	0	4	2
Portugal vs. nonsubject	3	2	2	2

Source: Compiled from data submitted in response to Commission questionnaires.

Table II-18

Uncoated paper: Count of purchasers reporting the significance of differences between uncoated paper produced in the United States and in other countries, by country pair

Count of purchasers

Country pair	Always	Frequently	Sometimes	Never
United States vs. Australia	2	1	3	0
United States vs. Brazil	4	2	4	0
United States vs. China	4	2	2	0
United States vs. Indonesia	4	1	4	0
United States vs. Portugal	4	2	6	0
Australia vs. Brazil	1	2	2	0
Australia vs. China	1	2	2	0
Australia vs. Indonesia	2	1	2	0
Australia vs. Portugal	2	1	2	0
Brazil vs. China	1	2	3	0
Brazil vs. Indonesia	1	2	3	0
Brazil vs. Portugal	1	3	4	0
China vs. Indonesia	1	2	2	1
China vs. Portugal	1	1	3	1
Indonesia vs. Portugal	1	2	2	1
U.S. vs. nonsubject	3	2	4	1
United States vs. nonsubject	1	0	2	1
Australia vs. nonsubject	1	0	3	1
Brazil vs. nonsubject	1	0	2	2
China vs. nonsubject	1	0	2	2
Indonesia vs. nonsubject	1	1	4	0

Source: Compiled from data submitted in response to Commission questionnaires.

A number of firms reported significant differences other than price. Many of these were already listed as factors that limited interchangeability. Differences not already listed included differences in U.S. product and Indonesian product on quality, availability, and transportation; product from Portugal is superior to that from product from other subject countries on availability (because the Portuguese importer faces lower antidumping margins than imports from other subject countries); Portuguese imports are superior to U.S. product on availability (because of the closure or conversion of U.S. mills away from uncoated paper production has reduced the availability of U.S. uncoated paper); product from Australia, Brazil, and Portugal is superior to uncoated paper from other sources because Australia, Brazil, and Portugal use eucalyptus fiber, which leads to superior paper performance; and U.S. producers' availability is better than that from any other source.

Elasticity estimates

This section discusses elasticity estimates. Parties did not comment on these estimates in their briefs. The U.S. supply elasticity, however, has been changed because of the information provided on production bottlenecks in papermaking equipment and shortages (discussed on page II-4 in this section).

U.S. supply elasticity

The domestic supply elasticity for uncoated paper measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of uncoated paper. The elasticity of domestic supply depends on several factors including the level of excess capacity, capacity bottlenecks, the ease with which producers can alter capacity, producers' ability to shift to production of other products, the existence of inventories, and the availability of alternate markets for U.S.-produced uncoated paper. Analysis of these factors above indicates that the U.S. industry has the ability to slightly increase or decrease shipments to the U.S. market in response to changes in demand; an estimate in the range of 1 to 3 is suggested. As bottlenecks are eliminated, firms will have increasing ability to change production in response to changes in demand.

U.S. demand elasticity

The U.S. demand elasticity for uncoated paper measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of uncoated paper. This estimate depends on factors discussed above such as the existence, availability, and commercial viability of substitute products, as well as the component share of the uncoated paper in the production of any downstream products. Based on the available information, the aggregate demand for uncoated paper is likely to be highly inelastic; a range of -0.25 to -0.5 is suggested.

Substitution elasticity

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.⁴⁶ Product differentiation, in turn, depends upon such factors as quality (e.g., chemistry, appearance, etc.) and conditions of sale (e.g., availability, sales terms/discounts/promotions, etc.). Based on available information, the elasticity of substitution between U.S.-produced uncoated paper and imported uncoated paper is likely to be in the range of 3 to 5.

⁴⁶ The substitution elasticity measures the responsiveness of the relative U.S. consumption levels of the subject imports and the domestic like products to changes in their relative prices. This reflects how easily purchasers switch from the U.S. product to the subject products (or vice versa) when prices change.

THE UNIVERSITY OF CHICAGO
DEPARTMENT OF CHEMISTRY
5800 S. UNIVERSITY AVENUE
CHICAGO, ILLINOIS 60637

100-100000

Part III: Condition of the U.S. industry

Overview

The information in this section of the report was compiled from responses to the Commission's questionnaires from eight firms, which accounted for the vast majority of U.S. production of uncoated paper during 2020.¹ Table III-1 presents developments in the industry since the imposition of the countervailing duty and antidumping duty orders.

¹ This section of the report includes data from U.S. producer ***.

**Table III-1
Uncoated paper: Developments in the U.S. industry since the imposition of the orders**

Year	Firm	Event
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
2018	Glatfelter	Glatfelter sold its specialty paper business unit to Lindsay Goldberg, which rebranded it as Pixelle Specialty Solutions. The assets include two mills (Spring Grove, Pennsylvania and Chillicothe, Ohio), converting operations (Fremont, Ohio), and woodyard operations (Delmar, Maryland; Piketon, Ohio; and Washington, West Virginia).
2019	Domtar	Domtar closes one paper machine at its Ashdown, Arkansas paper mill.
2019	***	***
2019	Georgia-Pacific and Flambeau River Paper	Georgia-Pacific (at its Port Hudson, Louisiana mill) and Flambeau River Paper (at its Park Falls, Wisconsin mill) exits communications paper business.
2020	Boise	Packaging Corporation of America announced it will temporarily idle uncoated freesheet manufacturing at its mill in Jackson, Alabama.
2020	Glatfelter	Glatfelter announced it is moving its corporate headquarters from City of York, Pennsylvania to Charlotte, North Carolina.
2020	Domtar	Domtar announced it is shutting down uncoated freesheet manufacturing at the Kingsport Mill in Kingsport, Tennessee and will convert it to manufacturing of containerboard.
August 2020	Domtar	Domtar announces it will permanently close its Port Huron, Michigan paper mill.
December 2020	International Paper	International Paper announces spin-off of printing papers business.
May 2021	Domtar	Paper Excellence enters into definitive agreement to acquire Domtar.
July 2021	Domtar	Domtar to restart paper machine at Ashdown, Arkansas.
July 2021	Domtar	Domtar, Paper Excellence merger approved by stockholders.
August 2021	International Paper	International Paper announces the record date and distribution date in connection with the spin-off of its printing papers business (Sylvamo Corporation).
October 2021	International Paper	International Paper completes the spin-off of its communications paper business (Sylvamo Corporation).
November 2021	Domtar	Paper Excellence Group announces the closing of its acquisition of Domtar Corporation.

Table continued.

Table III-1 Continued

Uncoated paper: Developments in the U.S. industry since the imposition of the orders

Sources: "Lindsay Goldberg Acquires Specialty Papers Business Unit of P.H. Glatfelter Company and Rebrands It Pixelle Specialty Solutions," October 31, 2018, <https://www.businesswire.com/news/home/20181031005751/en/Lindsay-Goldberg-Acquires-Specialty-Papers-Business-Unit-of-P.H.-Glatfelter-Company-and-Rebrands-It-Pixelle-Specialty-Solutions>, retrieved April 7, 2021; Domestic interested parties' response to the notice of institution, March 3, 2021, pp. 6 and 22; "Northern Wisconsin Paper Mill Seeks Buyer Amid Financial Struggles," May 10, 2019, <https://www.wpr.org/northern-wisconsin-paper-mill-seeks-buyer-amid-financial-struggles>, retrieved April 7, 2021; "Georgia-Pacific to Exit Communication Papers Business," January 10, 2019, <https://www.gp.com/news/2019/01/georgia-pacific-exits-communication-papers-business-port-hudson#:~:text=Port%20Hudson%20Communication%20Papers%20and%20Pulping%20Operations%20o%20Shut%20Down&text=ATLANTA%20%2F%20PORT%20HUDSON%2C%20LOUISIANA%20%E2%80%93,position%20in%20a%20declining%20market>, retrieved April 7, 2021; "The Domtar Plant in Ashdown Shut Down One of Its Two Paper Machines, Resulting in an Expected Downsizing of 79 Positions, October 10, 2019, <https://www.texarkanagazette.com/news/texarkana/story/2019/oct/10/domtar-plant-ashdown-shut-down-one-its-two-paper-machines-resulting-expected-downsizing-79-positions/799134/>, retrieved September 22, 2021; "PCA Announces Plans To Take Economic Downtime At Its Jackson, AL Uncoated Freesheet Mill," April 1, 2020, <http://ir.packagingcorp.com/news-releases/news-release-details/pca-announces-plans-take-economic-downtime-its-jackson-al>, retrieved April 1, 2021; "Glatfelter announces move out of York, ending 155-year run," February 12, 2020, <https://local21news.com/news/local/glatfelter-announces-move-out-of-york-ending-155-year-run>, retrieved April 1, 2021; "Domtar to Enter Containerboard Market with Kingsport Mill Conversion," September 5, 2020, <https://newsroom.domtar.com/containerboard-kingsport-mill-conversion/>, retrieved April 1, 2021; "Domtar Corp. to Close Port Huron Paper Mill, Eliminating About 200 Jobs, August 7, 2020, <https://www.thetimesherald.com/story/news/2020/08/07/domtar-corp-close-port-huron-mill-eliminate-200-jobs/3317308001/>, retrieved September 22, 2021; "International Paper to Sharpen Focus on Industrial Packaging, Announces Spin-Off of Printing Papers," December 3, 2020, <https://internationalpaper2015.q4web.com/news-releases/press-ri/2020/International-Paper-to-Sharpen-Focus-on-Industrial-Packaging-Announces-Spin-off-of-Printing-Papers/default.aspx>, retrieved September 22, 2021. "Paper Excellence Enters into Definitive Agreement to Acquire Domtar for \$55.50 Per Share in Cash, May 1, 2021, <https://newsroom.domtar.com/press-release/paper-excellence-enters-into-definitive-agreement-to-acquire-domtar-for-55-50-per-share-in-cash/>, retrieved September 22, 2021; "Domtar, Paper Excellence Merger Approved by Stockholders," July 29, 2021, <https://newsroom.domtar.com/press-release/domtar-paper-excellence-merger-approved-by-stockholders/>, retrieved September 22, 2021; "Domtar to Restart Paper Machine at Ashdown, Arkansas, Mill to Meet Customer Demand," July 15, 2021, <https://newsroom.domtar.com/press-release/domtar-to-restart-paper-machine-at-ashdown-arkansas-mill-to-meet-customer-demand/>. "Paper Excellence Welcomes Domtar Into Its Group of Companies", November 30, 2021, <https://paperexcellence.com/paper-excellence-welcomes-domtar-into-its-group-of-companies/>.

Changes experienced by the industry

Domestic producers were asked to indicate whether their firm had experienced any plant openings, relocations, expansions, acquisitions, consolidations, closures, or prolonged shutdowns because of strikes or equipment failure; curtailment of production because of shortages of materials or other reasons, including revision of labor agreements; or any other change in the character of their operations or organization relating to the production of

uncoated paper since January 1, 2015. All responding U.S. producers indicated that they had experienced such changes; their responses are presented in table III-2.

Table III-2
Uncoated paper: U.S. producers' reported changes in operations since January 1, 2015

Item	Firm name and accompanying narrative response
Plant closings	***
Expansions	***
Acquisitions	***
Acquisitions	***
Contractions or re-purposing	***
Contractions or re-purposing	***
Contractions or re-purposing	***
Prolonged shutdowns or curtailments	***
Prolonged shutdowns or curtailments	***
Prolonged shutdowns or curtailments	***
Revised labor agreements	***

Source: Compiled from data submitted in response to Commission questionnaires.

In February 2021, Packaging Corporation of America ("PCA"), the parent company of Boise, announced that it discontinued production of uncoated freesheet paper in paper machine number 3 at Boise's paper mill in Jackson, Alabama and began preparation for the permanent conversion to linerboard production.² This machine temporarily began producing linerboard in the fourth quarter of 2020 and continued production in the first quarter of 2021.³ It will be converted into a 700,000 ton-per-year, kraft linerboard machine over the next 36 months.⁴ According to PCA Chairman and CEO Mark Kowlzan, "this approach allows us to effectively enhance the mill's profitability and viability by managing the exacerbated decline in demand for uncoated freesheet product while addressing the Company's integrated containerboard supply needs."⁵

In 2020, Domtar stopped uncoated freesheet manufacturing in its paper mills in Kingsport, Tennessee, Port Huron, Michigan, and Ashdown, Arkansas as well as a converting center in Ridgefields, Tennessee.⁶ Domtar plans to enter the linerboard market by converting the Kingsport, Tennessee paper machine.⁷ The conversion is expected to be completed by the end of 2022.⁸ In July 2021, Domtar announced that it will restart a paper machine in its paper mill in Ashdown, Arkansas to meet increasing customer demand.⁹ The restart is expected to be completed in January 2022 and will enable Domtar to add 185,000 tons of uncoated freesheet capacity.¹⁰

² *Packaging Corporation of America Announces Conversion of Jackson, AL Mill Paper Machine To High-Performance Virgin Linerboard*, <http://ir.packagingcorp.com/news-releases/news-release-details/packaging-corporation-america-announces-conversion-jackson-al>, accessed October 10, 2021.

³ Ibid.

⁴ Ibid.

⁵ Ibid.

⁶ *Domtar Corporation Reports Preliminary Second Quarter 2020 Financial Results and Announced Strategic Initiatives*, <https://newsroom.domtar.com/press-release/domtar-corporation-reports-preliminary-second-quarter-2020-financial-results-and-announces-strategic-initiatives/>, accessed October 10, 2021.

⁷ Hearing transcript, p. 29 (Melton).

⁸ *Domtar Corporation Reports Preliminary Second Quarter 2020 Financial Results and Announced Strategic Initiatives*, <https://newsroom.domtar.com/press-release/domtar-corporation-reports-preliminary-second-quarter-2020-financial-results-and-announces-strategic-initiatives/>, accessed October 10, 2021 and *Domtar Corporation Reports Preliminary Third Quarter 2020 Financial Results*, <https://newsroom.domtar.com/press-release/domtar-corporation-reports-preliminary-third-quarter-2020-financial-results/>, accessed October 10, 2021.

⁹ *Domtar to Restart Paper Machine at Ashdown, Arkansas, Mill to Meet Customer Demand*, <https://newsroom.domtar.com/press-release/domtar-to-restart-paper-machine-at-ashdown-arkansas-mill-to-meet-customer-demand/>, accessed October 10, 2021.

¹⁰ Ibid. Hearing transcript, p. 29 (Melton).

In 2017, International Paper announced plans to invest approximately \$300 million to convert paper machine number 15 at its Riverdale paper mill in Selma, Alabama from uncoated freesheet production to whitetop linerboard and containerboard production.¹¹ Mike Amick Jr., International Paper's Senior Vice President for Papers in the Americas and India stated, "This investment proactively repositions Riverdale No. 15 to serve our growing packaging business."¹² The conversion of this paper machine was completed in the first quarter of 2021.¹³ In October 2021, International Paper completed the spin-off of its communications paper business to form a new company, Sylvamo.¹⁴

In January 2019, Georgia-Pacific announced its exit from the communications paper business after an "assessment of its long-term competitive position in a declining market."¹⁵ This exit resulted in the permanent shutdown of Georgia-Pacific's communications papers machines, related converters, and woodyard pulp mill in Port Hudson, Louisiana.¹⁶ According to Mike Adams, Georgia-Pacific's President of PRO and Communication Papers, "the required investment to sustain the operation long-term, coupled with the declining market, is not viable."¹⁷

Anticipated changes in operations

The Commission asked domestic producers to report anticipated changes in the character of their operations relating to the production of uncoated paper. Their responses appear in table III-3.

¹¹ *International Paper to Convert Riverdale Paper Machine*, <https://www.pulpapernews.com/20190803/8860/international-paper-convert-riverdale-paper-machine>, accessed October 10, 2021.

¹² *Ibid.*

¹³ *A Mostly Sunny Forecast for OCC, Mixed Paper Markets*, <https://www.recyclingtoday.com/article/mostly-sunny-forecast-occ-mixed-paper-markets/>, accessed October 10, 2021 and *Riverdale Mill – International Paper*, https://www.internationalpaper.com/docs/default-source/english/careers/riverdale-mill.pdf?sfvrsn=6824a533_14, accessed October 10, 2021.

¹⁴ *Introducing Sylvamo*, <https://www.internationalpaper.com/newsroom/introducing-sylvamo>, accessed October 10, 2021.

¹⁵ *Georgia-Pacific to Exit Communication Papers Business*, <https://gp.com/news/2019/01/georgia-pacific-exits-communication-papers-business-port-hudson>, accessed October 10, 2021.

¹⁶ *Ibid.*

¹⁷ *Ibid.*

Table III-3

Uncoated paper: U.S. producers' anticipated changes in operations

Item	Firm name and accompanying narrative response
Anticipated changes in operations	***.
Anticipated changes in operations	***.

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. production, sheeting capacity, and sheeting capacity utilization

Table III-4 presents data on U.S. producers' production, sheeting capacity, and sheeting capacity utilization. The collective annual sheeting capacity of the responding U.S. producers decreased in each year during 2015-20, ending 20.0 percent lower in 2020 than in 2015. The majority of the decrease during this period occurred during 2018-20, which reflected *** and the impact of the COVID-19 pandemic on several producers' operations in 2020. Among the five firms that reported sheeting capacity in each year during 2015-20, only *** reported more sheeting capacity in 2020 than in 2015.¹⁸ *** entered the uncoated paper industry in 2017 and its sheeting capacity *** during 2017-20. Responding U.S. producers' sheeting capacity was 27.4 percent lower in interim 2021 than in interim 2020. Four out of the seven firms that reported sheeting capacity in both interim periods had less sheeting capacity in interim 2021 than in interim 2020.¹⁹

¹⁸ *** sheeting capacity increased in each year during 2015-20, ending *** percent higher in 2015 than in 2020. *** sheeting capacities decreased by *** percent, *** percent, and *** percent, respectively, during 2015-20. *** sheeting capacity decreased less noticeably by *** percent over the same period. The majority of *** decreases in sheeting capacity occurred from 2019 to 2020. *** decrease in sheeting capacity from 2019 to 2020 was largely due to ***. *** decrease in sheeting capacity from 2019 to 2020 reflected ***. *** decrease in production capacity from 2019 to 2020 was caused by ***. Email from ***, September 22, 2021; email from ***, September 24, 2021; email from ***, September 24, 2021.

¹⁹ There was minimal difference in *** sheeting capacity between interim 2020 and interim 2021 (**% percent). *** sheeting capacities were *** percent, *** percent, and *** percent lower, respectively, in interim 2021 than in interim 2020. *** lower sheeting capacity in interim 2021 was due to ***. *** lower sheeting capacity in interim 2021 reflected ***. *** decreased production capacity in interim 2021 was caused by ***. Email from ***, September 22, 2021; email from ***, September 24, 2021; and email from ***, October 5, 2021.

Table III-4
Uncoated paper: U.S. producers' sheeting capacity, by firm and period

Capacity in short tons

Firm	2015	2016	2017
Boise	***	***	***
Domtar	***	***	***
Finch Paper	***	***	***
Georgia-Pacific	***	***	***
International Paper	***	***	***
NORPAC	***	***	***
Performance Office Paper	***	***	***
Pixelle	***	***	***
All firms	4,347,405	4,314,835	4,293,756

Table continued.

Table III-4 Continued
Uncoated paper: U.S. producers' sheeting capacity, by firm and period

Capacity in short tons

Firm	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Boise	***	***	***	***	***
Domtar	***	***	***	***	***
Finch Paper	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
International Paper	***	***	***	***	***
NORPAC	***	***	***	***	***
Performance Office Paper	***	***	***	***	***
Pixelle	***	***	***	***	***
All firms	4,259,054	3,972,716	3,476,598	1,850,914	1,343,360

Table continued.

Table III-4 Continued
Uncoated paper: U.S. producers' production, by firm and period

Production in short tons

Firm	2015	2016	2017
Boise	***	***	***
Domtar	***	***	***
Finch Paper	***	***	***
Georgia-Pacific	***	***	***
International Paper	***	***	***
NORPAC	***	***	***
Performance Office Paper	***	***	***
Pixelle	***	***	***
All firms	3,642,012	3,531,714	3,497,671

Table continued.

Table III-4 Continued
Uncoated paper: U.S. producers' production, by firm and period

Production in short tons

Firm	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Boise	***	***	***	***	***
Domtar	***	***	***	***	***
Finch Paper	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
International Paper	***	***	***	***	***
NORPAC	***	***	***	***	***
Performance Office Paper	***	***	***	***	***
Pixelle	***	***	***	***	***
All firms	3,426,136	3,198,896	2,208,112	1,119,265	1,039,049

Table continued.

Table III-4 Continued
Uncoated paper: U.S. producers' sheeting capacity utilization ratio, by firm and period

Ratio in percent

Firm	2015	2016	2017
Boise	***	***	***
Domtar	***	***	***
Finch Paper	***	***	***
Georgia-Pacific	***	***	***
International Paper	***	***	***
NORPAC	***	***	***
Performance Office Paper	***	***	***
Pixelle	***	***	***
All firms	83.8	81.9	81.5

Table continued.

Table III-4 Continued

Uncoated paper: U.S. producers' sheeting capacity utilization ratio, by firm and period

Ratio in percent

Firm	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Boise	***	***	***	***	***
Domtar	***	***	***	***	***
Finch Paper	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
International Paper	***	***	***	***	***
NORPAC	***	***	***	***	***
Performance Office Paper	***	***	***	***	***
Pixelle	***	***	***	***	***
All firms	80.4	80.5	63.5	60.5	77.3

Table continued.

Table III-4 Continued

Uncoated paper: U.S. producers' share of production, by firm and period

Share in percent

Firm	2015	2016	2017
Boise	***	***	***
Domtar	***	***	***
Finch Paper	***	***	***
Georgia-Pacific	***	***	***
International Paper	***	***	***
NORPAC	***	***	***
Performance Office Paper	***	***	***
Pixelle	***	***	***
All firms	100.0	100.0	100.0

Table continued.

Table III-4 Continued
 Uncoated paper: U.S. producers' share of production, by firm and period

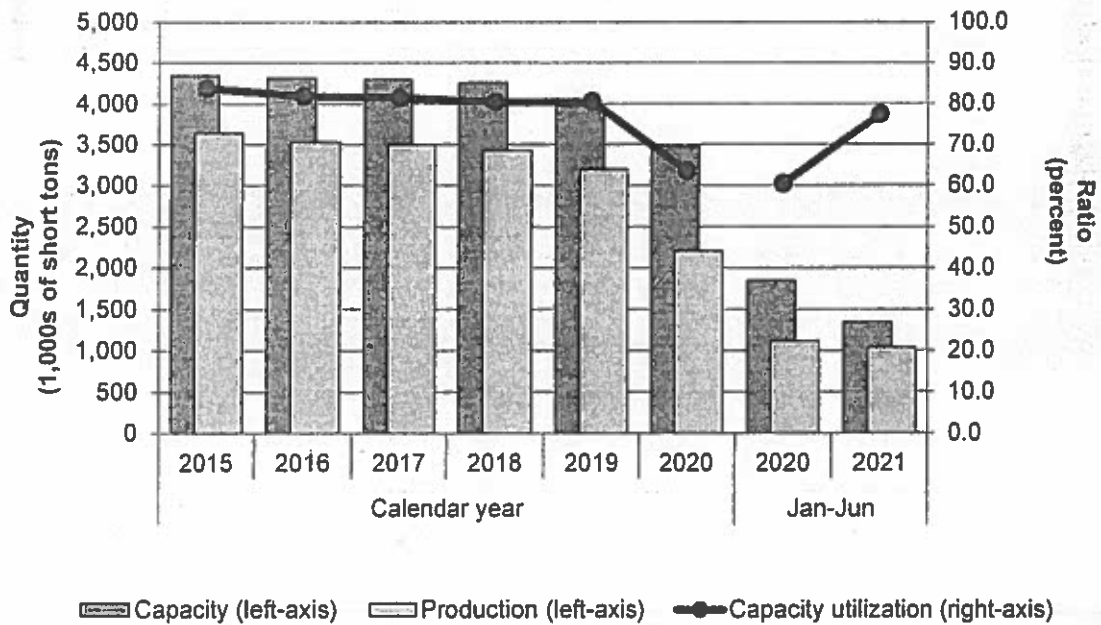
Share in percent

Firm	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Boise	***	***	***	***	***
Domtar	***	***	***	***	***
Finch Paper	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
International Paper	***	***	***	***	***
NORPAC	***	***	***	***	***
Performance Office Paper	***	***	***	***	***
Pixelle	***	***	***	***	***
All firms	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure III-1
 Uncoated paper: U.S. producers' capacity, production, and capacity utilization, by period



Source: Compiled from data submitted in response to Commission questionnaires.

Responding U.S. producers' combined production also decreased in each year during 2015-20, ending 39.4 percent lower in 2020 than in 2015.²⁰ The majority of their decrease in production occurred from 2019 to 2020, reflecting the impact of the COVID-19 pandemic on several firms' production in 2020. All five firms that reported production in each year during 2015-20 reported less production in 2020 than in 2015, with *** accounting for the vast majority of the decrease.²¹ U.S. producers' combined production was 7.2 percent lower in interim 2021 than in interim 2020. Although five of seven firms reported more production in interim 2021 than in interim 2020, this increase was offset by the reduced production reported by ***.²²

²⁰ ***.

²¹ *** production increased by *** percent and *** percent, respectively, during 2015-19, but then decreased by *** percent and *** percent, respectively, from 2019 to 2020. Overall, *** production were *** percent and *** percent lower, respectively, in 2020 than in 2015. ***. *** had a more continuous decrease in production during 2015-20, ending *** percent lower in 2020 than in 2015. ***. Email from ***, September 22, 2021; email from ***, September 24, 2021; and email from ***, October 5, 2021.

²² ***. Email from ***, September 24, 2021 and email from ***, October 5, 2021.

Responding U.S. producers' sheeting capacity utilization decreased irregularly from 83.8 percent in 2015 to 63.5 percent in 2020.²³ Most of this decrease occurred from 2019 to 2020 (80.5 percent to 63.5 percent) as production decreased faster than sheeting capacity. *** reported more than *** percent sheeting capacity utilization during 2015-19, but each reported noticeably lower sheeting capacity utilization in 2020 (*** percent and *** percent, respectively). ***, had a more gradual decrease in sheeting capacity utilization from *** percent in 2015 to *** percent in 2020. Responding U.S. producers' sheeting capacity utilization was 77.3 percent in interim 2021, compared to 60.5 percent in interim 2020. Five out of seven firms, including ***, reported a higher sheeting capacity utilization in interim 2021 than in interim 2020.

Table III-5 presents responding U.S. producers' production by input. Nearly all U.S. producers' production (over *** percent) during 2015-20 and both interim periods were from internally-produced sheeter rolls. Only one producer, ***, produced uncoated paper using purchased sheeter rolls during 2015-20 and in both interim periods. No responding firm produced uncoated paper using imported sheeter rolls during 2015-20 or in either interim period.

²³ Since the in-scope merchandise only includes cut paper, capacity is based on the papercutting equipment rather than the papermaking capacity. Navigator, however, states that its paper machines are designed to always be the bottleneck while its mills are designed to have excess sheeting capacity. Hearing transcript, pp. 204-205 (Redondo).

**Table III-5
Uncoated paper: U.S. producers' production, by input and period**

Quantity in short tons; share in percent

Item	Measure	2015	2016	2017
Internally produced rolls	Quantity	***	***	***
Domestically purchased rolls	Quantity	***	***	***
Imported rolls	Quantity	***	***	***
Total production	Quantity	3,642,012	3,531,714	3,497,671
Internally produced rolls	Share of quantity	***	***	***
Domestically purchased rolls	Share of quantity	***	***	***
Imported rolls	Share of quantity	***	***	***
Total production	Share of quantity	100.0	100.0	100.0

Table continued.

**Table III-5 Continued
Uncoated paper: U.S. producers' production, by input and period**

Quantity in short tons; share in percent

Item	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Internally produced rolls	Quantity	***	***	***	***	***
Domestically purchased rolls	Quantity	***	***	***	***	***
Imported rolls	Quantity	***	***	***	***	***
Total production	Quantity	3,426,136	3,198,896	2,208,112	1,119,265	1,039,049
Internally produced rolls	Share of quantity	***	***	***	***	***
Domestically purchased rolls	Share of quantity	***	***	***	***	***
Imported rolls	Share of quantity	***	***	***	***	***
Total production	Share of quantity	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" percent represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "--".

PAGE NO

Alternative products

As shown in table III-6, uncoated paper accounted for *** percent of total production on shared equipment in each year during 2015-20 and in both interim periods. *** reported production of out-of-scope merchandise on the same machinery used to produce uncoated paper during 2015-20 and both interim periods. ***.

Table III-6

Uncoated paper: U.S. producers' overall sheeting capacity and production on the same equipment as subject production, by product type and period

Quantity in short tons; share and ratio in percent

Item	Measure	2015	2016	2017
Overall sheeting capacity	Quantity	4,444,813	4,410,584	4,381,562
Production: Uncoated paper	Quantity	3,642,012	3,531,714	3,497,671
Production: Sheets over 150 gsm	Quantity	***	***	***
Production: Coated paper	Quantity	***	***	***
Production: Other products	Quantity	***	***	***
Production: Out-of-scope products	Quantity	***	***	***
Production: All products on same machinery	Quantity	***	***	***
Overall sheeting capacity utilization	Ratio	***	***	***
Production: Uncoated paper	Share	***	***	***
Production: Sheets over 150 gsm	Share	***	***	***
Production: Coated paper	Share	***	***	***
Production: Other products	Share	***	***	***
Production: Out-of-scope products	Share	***	***	***
Production: All products on same machinery	Share	100.0	100.0	100.0

Table continued.

Table III-6 Continued

Uncoated paper: U.S. producers' overall sheeting capacity and production on the same equipment as subject production, by product type and period

Quantity in short tons; share and ratio in percent

Item	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Overall sheeting capacity	Quantity	4,352,788	4,055,529	3,547,631	1,893,522	1,380,516
Production: Uncoated paper	Quantity	3,426,136	3,198,896	2,208,112	1,119,265	1,039,049
Production: Sheets over 150 gsm	Quantity	***	***	***	***	***
Production: Coated paper	Quantity	***	***	***	***	***
Production: Other products	Quantity	***	***	***	***	***
Production: Out-of-scope products	Quantity	***	***	***	***	***
Production: All products on same machinery	Quantity	***	***	***	***	***
Overall sheeting capacity utilization	Ratio	***	***	***	***	***
Production: Uncoated paper	Share	***	***	***	***	***
Production: Sheets over 150 gsm	Share	***	***	***	***	***
Production: Coated paper	Share	***	***	***	***	***
Production: Other products	Share	***	***	***	***	***
Production: Out-of-scope products	Share	***	***	***	***	***
Production: All products on same machinery	Share	100.0	100.0	100.0	100.0	100.0

Sources: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

Constraints on capacity

All eight responding U.S. producers reported production constraints. In their responses to the Commission's questionnaire, the firms cited *** as factors that limit production and production capacity of uncoated paper.

2024 APR 10

U.S. producers' U.S. shipments and exports

Table III-7 presents U.S. producers' U.S. shipments, export shipments, and total shipments. U.S. shipments accounted for the vast majority of responding U.S. producers' total shipments in each year during 2015-20 and in both interim periods.²⁴ Exhibiting a similar trend as production, the quantity of responding U.S. producers' U.S. shipments decreased in each year during 2015-20, ending 36.7 percent lower in 2020 than in 2015. The majority of the decrease occurred from 2019 to 2020 when U.S. shipments decreased by 27.4 percent. In contrast, the year-to-year decrease during 2015-19 never exceeded 7.6 percent and was no more than 2.1 percent for three of those years. Among the six firms that reported U.S. shipments in each year during 2015-20, only one, ***, reported more shipments in 2020 than in 2015. *** accounted for the vast majority of the decrease in U.S. shipments during 2015-20, with most of their decreases occurring from 2019 to 2020.²⁵ Responding U.S. producers' U.S. shipments quantity was 3.0 percent lower in interim 2021 and interim 2020. Five of the six firms that reported U.S. shipments in both interim periods had lower U.S. shipments in interim 2021 than in interim 2020. The value of responding U.S. producers' U.S. shipments irregularly decreased by 31.5 percent during 2015-20, with the vast majority of the decrease occurring from 2019 to 2020. It was 4.1 percent lower in interim 2021 than in interim 2020.

²⁴ *** reported commercial U.S. shipments in each year during 2015-20 and both interim periods, while *** reported commercial U.S. shipments only during 2015-19. *** reported internal consumption during 2015-20 and both interim periods. None of the responding U.S. producers reported transfers to related firms during the period for which data were collected.

²⁵ *** U.S. shipments irregularly increased by *** percent during 2015-19, but then decreased by *** percent from 2019 to 2020, ending *** percent lower in 2020 than in 2015. ***, *** U.S. shipments decreased by *** percent during 2015-19, but then decreased more by *** percent from 2019 to 2020, ending *** percent lower in 2020 than in 2015. According to ***, *** U.S. shipments irregularly increased by *** percent during 2015-19, but then decreased by *** percent from 2019 to 2020, ending *** percent lower in 2020 than in 2015. ***, Email from ***, September 22, 2021; email from ***, September 24, 2021; and email from ***, October 5, 2021.

Table III-7
Uncoated paper: U.S. producers' shipments, by destination and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; shares in percent

Item	Measure	2015	2016	2017
U.S. shipments	Quantity	3,388,795	3,328,741	3,258,741
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
U.S. shipments	Value	3,213,635	3,158,395	3,041,065
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***
U.S. shipments	Unit value	948	949	933
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
U.S. shipments	Share of quantity	***	***	***
Export shipments	Share of quantity	***	***	***
Total shipments	Share of quantity	100.0	100.0	100.0
U.S. shipments	Share of value	***	***	***
Export shipments	Share of value	***	***	***
Total shipments	Share of value	100.0	100.0	100.0

Table continued.

Table III-7 Continued

Uncoated paper: U.S. producers' shipments, by destination and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; shares in percent

Item	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
U.S. shipments	Quantity	3,192,941	2,951,601	2,143,775	1,087,240	1,054,724
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
U.S. shipments	Value	3,112,681	3,087,613	2,201,391	1,122,490	1,076,026
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***
U.S. shipments	Unit value	975	1,046	1,027	1,032	1,020
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
U.S. shipments	Share of quantity	***	***	***	***	***
Export shipments	Share of quantity	***	***	***	***	***
Total shipments	Share of quantity	100.0	100.0	100.0	100.0	100.0
U.S. shipments	Share of value	***	***	***	***	***
Export shipments	Share of value	***	***	***	***	***
Total shipments	Share of value	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

The average unit value of responding U.S. producers' U.S. shipments decreased from \$948 per short ton in 2015 to \$933 per short ton in 2017, but then increased irregularly to \$1,027 per short ton in 2020.²⁶ It was \$1,020 per short ton in interim 2021 and \$1,032 per short ton in interim 2020. Five out of seven firms reported lower unit values in interim 2021 than in interim 2020.²⁷

By quantity, export shipments accounted for a small minority of responding U.S. producers' total shipments in each year during 2015-20 and in both interim periods. *** reported export shipments during 2015-20.²⁸ Responding U.S. producers' export shipments, by quantity, fluctuated during 2015-20. It increased irregularly by *** percent from 2015 to 2018, but then decreased by *** percent during 2018-20, ending *** percent lower in 2020 than in 2015. The quantity of responding U.S. producers' export shipments was *** percent lower in interim 2021 than in interim 2020. Responding U.S. producers' export shipments, by value, also fluctuated during 2015-20. It increased by *** percent from 2015 to 2018, but then decreased by *** percent during 2018-20, ending *** percent lower in 2020 than in 2015. The combined value of U.S. producers' export shipments was *** percent lower in interim 2021 than in interim 2020. The unit value of export shipments was lower than the unit value of U.S. shipments in each year during 2015-20 and in both interim periods.

²⁶ The unit values of *** U.S. shipments followed the same trend as the average unit value, decreasing from 2015 to 2017, but then increasing from 2017 to 2020, ending higher in 2020 than in 2015. The unit value of *** U.S. shipments increased in each year during 2015-20, reaching a high of \$*** per short ton. ***. The unit values of *** U.S. shipments were *** per short ton in each year during 2015-20, while the unit value of *** U.S. shipments were *** per short ton. U.S. producers' unit values ranged from \$*** per short ton to \$*** per short ton during 2015-20.

²⁷ ***. Email from ***, September 22, 2021.

²⁸ In their responses to the Commission's U.S. producers' questionnaire, *** identified *** as their principal export market. *** also identified *** as a principal export market. *** did not identify its export markets.

U.S. producers' inventories

Table III-8 presents responding U.S. producers' end-of-period inventories and the ratio of inventories to their production, U.S. shipments, and total shipments. Responding U.S. producers' end-of-period inventories fluctuated year to year during 2015-20, ending 14.2 percent lower in 2020 than in 2015. It was 33.0 percent lower in interim 2021 than in interim 2020. The ratio of responding U.S. producers' end-of-period inventories to their production ranged from 9.5 percent in 2016 to 13.5 percent in 2020 and was 22.6 percent in interim 2021, compared with 31.3 percent in interim 2020.²⁹ The ratio of responding U.S. producers' end-of-period inventories to their U.S. shipments ranged from 10.1 percent in 2016 to 13.9 percent in 2020 and was 11.1 percent in interim 2021, compared with 16.1 percent in interim 2020.

Table III-8
Uncoated paper: U.S. producers' end-of-period inventories, by period

Quantity in short tons; inventory ratio in percent

Item	2015	2016	2017
End-of-period inventory quantity	347,848	335,251	346,627
Inventory ratio to U.S. production	9.6	9.5	9.9
Inventory ratio to U.S. shipments	10.3	10.1	10.6
Inventory ratio to total shipments	***	***	***

Table continued.

Table III-8 Continued
Uncoated paper: U.S. producers' end-of-period inventories, by period

Quantity in short tons; inventory ratio in percent

Item	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
End-of-period inventory quantity	334,573	391,314	298,457	349,974	234,633
Inventory ratio to U.S. production	9.8	12.2	13.5	31.3	22.6
Inventory ratio to U.S. shipments	10.5	13.3	13.9	16.1	11.1
Inventory ratio to total shipments	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

²⁹ The higher ratio in interim 2020 is largely due to the decrease in responding U.S. producers' production from 2019 to 2020 as a result of the COVID-19 pandemic, which is discussed previously in this Part.

U.S. producers' imports and purchases

Table III-9 presents data on *** imports of uncoated paper and table III-10 presents *** reasons for importing uncoated paper. *** imported uncoated paper from *** in each year during 2015-20. The ratio of *** imports from *** to its U.S. production ranged from *** percent in 2018 to *** percent in 2020 and was *** percent in interim 2021, compared with *** percent in interim 2020. No responding U.S. producer reported purchases of uncoated paper during 2015-20 or either interim periods.

Table III-9

Uncoated paper: * U.S. production, U.S. imports, and ratio of imports to production, by period**

Quantity in short tons; ratio in percent

Item	Measure	2015	2016	2017
U.S. production	Quantity	***	***	***
Imports from ***	Quantity	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***

Table continued.

Table III-9 Continued

Uncoated paper: * U.S. production, U.S. imports, and ratio of imports to production, by period**

Quantity in short tons; ratio in percent

Item	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
U.S. production	Quantity	***	***	***	***	***
Imports from ***	Quantity	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table III-10

Uncoated paper: * reasons for importing**

Item	Firm's narrative response
***'s reason for importing	***.

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. employment, wages, and productivity

Table III-11 presents U.S. producers' employment-related data. The number of production related workers ("PRWs") decreased by 28.1 percent during 2015-20 with the majority of the decrease occurring from 2019 to 2020 when the number of PRWs decreased by 26.1 percent. In contrast, the year-to-year change in the number PRWs did not exceed 6.0 percent during 2015-19. The number of PRWs was 27.8 percent lower in interim 2021 than in interim 2020. Productivity decreased in each year during 2015-20, except from 2016 to 2017, ending 19.7 percent lower in 2020 than in 2015. It was 21.4 percent higher in interim 2021 than in interim 2020. Unit labor costs increased in each year during 2015-20, except from 2016 to 2017, ending 32.0 percent higher in 2020 than in 2015. It was 17.5 percent lower in interim 2021 than in interim 2020. Total hours worked and wages paid were lower in 2020 than in 2015 and lower in interim 2021 than in interim 2020. However, hourly wages were higher in 2020 than in 2015 and were higher in interim 2021 than in interim 2020.

Table III-11
Uncoated paper: U.S. producers' employment-related data, by period

Item	2015	2016	2017
Production and related workers (PRWs) (number)	5,844	5,836	5,489
Total hours worked (1,000 hours)	12,461	12,406	12,111
Hours worked per PRW (hours)	2,132	2,126	2,206
Wages paid (\$1,000)	485,504	490,969	461,565
Hourly wages (dollars per hour)	\$38.96	\$39.58	\$38.11
Productivity (short tons per 1,000 hour)	292	285	289
Unit labor costs (dollars per short ton)	\$133	\$139	\$132

Table continued.

Table III-11 Continued
Uncoated paper: U.S. producers' employment-related data, by period

Item	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Production and related workers (PRWs) (number)	5,816	5,683	4,201	4,488	3,242
Total hours worked (1,000 hours)	12,647	12,063	9,413	5,166	3,950
Hours worked per PRW (hours)	2,175	2,123	2,241	1,151	1,218
Wages paid (\$1,000)	495,918	497,912	388,680	214,149	164,109
Hourly wages (dollars per hour)	\$39.21	\$41.28	\$41.29	\$41.45	\$41.55
Productivity (short tons per 1,000 hour)	271	265	235	217	263
Unit labor costs (dollars per short ton)	\$145	\$156	\$176	\$191	\$158

Source: Compiled from data submitted in response to Commission questionnaires.

Financial experience of U.S. producers

Background³⁰

Eight U.S. producers provided usable financial results on their uncoated paper operations: Boise, Domtar, Finch Paper, Georgia-Pacific, International Paper, NORPAC, Performance Office Paper, and Pixelle.^{31 32} All eight U.S. producers reported financial data for a fiscal year ending December 31 and on the basis of GAAP. The questionnaire responses are believed to account for over 80 percent of U.S. producers' sales of uncoated paper in 2020.^{33 34}

Net sales consisted primarily of commercial sales, with only one producer reporting internal consumption from January 2015 to June 2021.^{35 36} Non-commercial sales are included

³⁰ The following abbreviations may be used in the tables and/or text of this section: generally accepted accounting principles ("GAAP"), fiscal year ("FY"), net sales ("NS"), cost of goods sold ("COGS"), selling, general, and administrative expenses ("SG&A expenses"), average unit values ("AUVs"), research and development expenses ("R&D expenses"), and return on assets ("ROA").

³¹ Pixelle Specialty Solutions ("Pixelle") became a U.S. producer of uncoated paper in October 2018, when Lindsay Goldberg LLC acquired the assets from Glatfelter (two mills located in Spring Grove, Pennsylvania and Chillicothe, Ohio; one converting operation at Fremont, Ohio; and, three woodyard operations at Delmar, Maryland, Picketon, Ohio, and Washington, West Virginia). ***. See table III-1 for additional information. Email from Ben Pember, Pixelle, November 29, 2021.

³² On November 30, 2021, Domtar was acquired by Paper Excellence Group, a private limited company organized under the laws of the Netherlands ("Paper Excellence" with seven pulp and paper manufacturing facilities in Canada). Domtar will operate as a stand-alone business entity within Paper Excellence Group. Domtar added that it will have ***. Paper Excellence webpage, <https://paperexcellence.com/paper-excellence-welcomes-domtar-into-its-group-of-companies/>, retrieved December 14, 2021 and domestic interested parties' posthearing brief, exh. 2.

³³ Domestic interested parties' response to the notice of institution, March 3, 2021, p. 23 and exh. 3; Domestic interested parties' supplemental response to the notice of institution, April 1, 2021, p. 4.

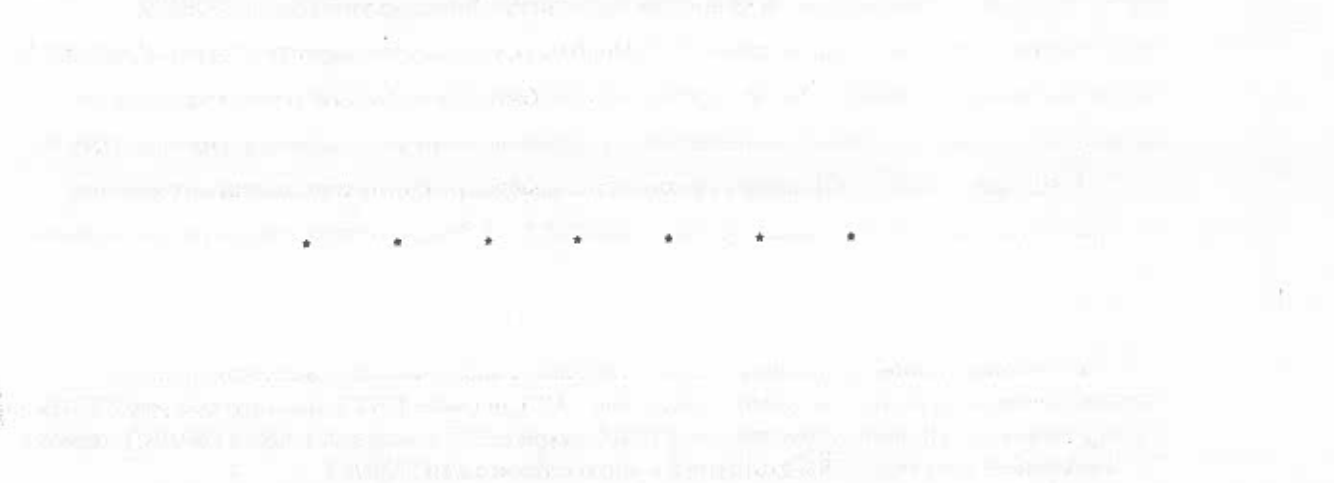
³⁴ Effective October 1, 2021, International Paper (NYSE: IP) has spun-off its Printing Papers segment into a standalone, publicly traded company called Sylvamo (NYSE: SLVM). International Paper and Sylvamo webpages: <https://www.internationalpaper.com/newsroom/introducing-sylvamo>; <https://internationalpaper2015.q4web.com/news-releases>; and, <https://www.sylvamo.com/us/en/newsroom>, retrieved October 12, 2021.

³⁵ The internal consumption reported by *** accounted for less than *** percent of total net sales by quantity and value from January 2015 to June 2021. No U.S. producer reported transfers to related firms during this period.

³⁶ Tolling arrangements of U.S. producers accounted for less than *** percent of total U.S. shipments by quantity in 2020. Four U.S. producers (***) reported toll arrangements as a tollee; *** reported operating as a toller for Boise and Pixelle (formerly Glatfelter). Individually, tolling arrangements by *** accounted for from *** to *** percent of each firm's total shipments in 2020 and have minimal impact on the financial data. *** did not have any tolling arrangement over the period for which data were collected. See footnote 20 in this section of the report and staff worksheet, EDIS Doc. 755308 (December 1, 2021).

but not presented separately in this section of the report. Figure III-2 presents each responding firm's share of the net sales quantity in 2020 in the uncoated paper market.

Figure III-2
Uncoated paper: Share of net sales quantity in 2020, by firm



Source: Compiled from data submitted in response to Commission questionnaires.

CASE NO

Operations on uncoated paper

Table III-12 presents aggregated data on U.S. producers' operations in relation to uncoated paper, while table III-13 presents corresponding changes in AUVs. Appendix table G-1 presents selected company-specific financial data. Differences in AUVs of sales and costs are largely attributable to differences in product mix and level of vertical integration among producers as well as the impact of COVID-19 on sales of uncoated paper in 2020.³⁷

Table III-12
Uncoated paper: Results of operations of U.S. producers, by item and period

Quantity in short tons; value in 1,000 dollars; ratios in percent and represent ratio to net sales

Item	Measure	2015	2016	2017
Total net sales	Quantity	3,623,700	3,549,814	3,486,383
Total net sales	Value	3,396,525	3,332,430	3,220,163
Raw material costs	Value	1,363,634	1,337,779	1,326,171
Energy costs	Value	207,042	195,618	203,380
Direct labor costs	Value	371,248	380,234	347,315
Other factory costs	Value	939,740	941,103	893,048
Cost of goods sold	Value	2,881,664	2,854,734	2,769,914
Gross profit or (loss)	Value	514,861	477,696	450,249
SG&A expenses	Value	222,498	214,322	214,694
Operating income or (loss)	Value	292,363	263,374	235,555
Other expense / (income), net	Value	67,699	30,137	101,047
Net income or (loss)	Value	224,664	233,237	134,508
Depreciation/amortization	Value	213,205	216,489	269,698
Cash flow	Value	437,869	449,726	404,206
Raw material costs	Ratio	40.1	40.1	41.2
Energy costs	Ratio	6.1	5.9	6.3
Direct labor costs	Ratio	10.9	11.4	10.8
Other factory costs	Ratio	27.7	28.2	27.7
Cost of goods sold	Ratio	84.8	85.7	86.0
Gross profit	Ratio	15.2	14.3	14.0
SG&A expense	Ratio	6.6	6.4	6.7
Operating income or (loss)	Ratio	8.6	7.9	7.3
Net income or (loss)	Ratio	6.6	7.0	4.2

Table continued on next page.

³⁷ Six of eight U.S. producers cited negative impact on financial performance and/or production as a result of conditions caused by COVID-19 such as reduced demand for uncoated paper and supply chain difficulties. U.S. producer questionnaires, II-2b. For additional information, see appendix G.

Table III-12—Continued

Uncoated paper: Results of operations of U.S. producers, by item and period

Quantity in short tons; value in 1,000 dollars; ratios in percent and represent ratio to net sales

Item	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Total net sales	Quantity	3,437,750	3,155,666	2,261,139	1,151,445	1,104,262
Total net sales	Value	3,322,432	3,270,723	2,305,494	1,177,281	1,123,554
Raw material costs	Value	1,364,316	1,266,316	877,288	459,604	398,457
Energy costs	Value	208,938	191,595	139,236	72,902	59,976
Direct labor costs	Value	381,779	388,904	331,562	182,182	134,613
Other factory costs	Value	1,009,594	864,703	696,134	381,393	302,920
Cost of goods sold	Value	2,964,627	2,711,518	2,044,220	1,096,081	895,966
Gross profit or (loss)	Value	357,805	559,205	261,274	81,200	227,588
SG&A expenses	Value	210,967	208,740	101,791	61,845	48,025
Operating income or (loss)	Value	146,838	350,465	159,483	19,355	179,563
Other expense / (income), net	Value	304,280	48,612	171,093	9,022	12,863
Net income or (loss)	Value	(157,442)	301,853	(11,610)	10,333	166,700
Depreciation/amortization	Value	437,588	139,414	120,339	62,940	33,716
Cash flow	Value	280,146	441,267	108,729	73,273	200,416
Raw material costs	Ratio	41.1	38.7	38.1	39.0	35.5
Energy costs	Ratio	6.3	5.9	6.0	6.2	5.3
Direct labor costs	Ratio	11.5	11.9	14.4	15.5	12.0
Other factory costs	Ratio	30.4	26.4	30.2	32.4	27.0
Cost of goods sold	Ratio	89.2	82.9	88.7	93.1	79.7
Gross profit	Ratio	10.8	17.1	11.3	6.9	20.3
SG&A expense	Ratio	6.3	6.4	4.4	5.3	4.3
Operating income or (loss)	Ratio	4.4	10.7	6.9	1.6	16.0
Net income or (loss)	Ratio	(4.7)	9.2	(0.5)	0.9	14.8

Table continued on next page.

Table III-12—Continued

Uncoated paper: Results of operations of U.S. producers, by item and period

Shares in percent and represent the share of COGS; unit values in dollars per short ton; count in number of firms reporting

Item	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Raw material costs	Share	46.0	46.7	42.9	41.9	44.5
Energy costs	Share	7.0	7.1	6.8	6.7	6.7
Direct labor costs	Share	12.9	14.3	16.2	16.6	15.0
Other factory costs	Share	34.1	31.9	34.1	34.8	33.8
Cost of goods sold	Share	100.0	100.0	100.0	100.0	100.0
Total net sales	Unit value	966	1,036	1,020	1,022	1,017
Raw material costs	Unit value	397	401	388	399	361
Energy costs	Unit value	61	61	62	63	54
Direct labor costs	Unit value	111	123	147	158	122
Other factory costs	Unit value	294	274	308	331	274
Cost of goods sold	Unit value	862	859	904	952	811
Gross profit or (loss)	Unit value	104	177	116	71	206
SG&A expenses	Unit value	61	66	45	54	43
Operating income or (loss)	Unit value	43	111	71	17	163
Net income or (loss)	Unit value	(46)	96	(5)	9	151
Operating losses	Count	3	1	1	2	0
Net losses	Count	3	1	1	2	0
Data	Count	8	8	7	7	7

Source: Compiled from data submitted in response to Commission questionnaires.

Table III-12—Continued

Uncoated paper: Results of operations of U.S. producers, by item and period

Shares in percent and represent the share of COGS; unit values in dollars per short ton; count in number of firms reporting

Item	Measure	2015	2016	2017
Raw material costs	Share	47.3	46.9	47.9
Energy costs	Share	7.2	6.9	7.3
Direct labor costs	Share	12.9	13.3	12.5
Other factory costs	Share	32.6	33.0	32.2
Cost of goods sold	Share	100.0	100.0	100.0
Total net sales	Unit value	937	939	924
Raw material costs	Unit value	376	377	380
Energy costs	Unit value	57	55	58
Direct labor costs	Unit value	102	107	100
Other factory costs	Unit value	259	265	256
Cost of goods sold	Unit value	795	804	794
Gross profit or (loss)	Unit value	142	135	129
SG&A expenses	Unit value	61	60	62
Operating income or (loss)	Unit value	81	74	68
Net income or (loss)	Unit value	62	66	39
Operating losses	Count	1	1	2
Net losses	Count	1	2	2
Data	Count	8	8	8

Table continued on next page.

Table III-13
Uncoated paper: Changes in AUVs between comparison periods

Changes in percent

Item	2015-20	2015-16	2016-17	2017-18	2018-19	2019-20	Jan-Jun 2020-21
Total net sales	▲ 8.8	▲ 0.2	▼ (1.6)	▲ 4.6	▲ 7.2	▼ (1.6)	▼ (0.5)
Raw material costs	▲ 3.1	▲ 0.1	▲ 0.9	▲ 4.3	▲ 1.1	▼ (3.3)	▼ (9.6)
Energy costs	▲ 7.8	▼ (3.6)	▲ 5.9	▲ 4.2	▼ (0.1)	▲ 1.4	▼ (14.2)
Direct labor costs	▲ 43.1	▲ 4.6	▼ (7.0)	▲ 11.5	▲ 11.0	▲ 19.0	▼ (23.0)
Other factory costs	▲ 18.7	▲ 2.2	▼ (3.4)	▲ 14.6	▼ (6.7)	▲ 12.4	▼ (17.2)
Cost of goods sold	▲ 13.7	▲ 1.1	▼ (1.2)	▲ 8.5	▼ (0.4)	▲ 5.2	▼ (14.8)

Table continued.

Table III-13—Continued
Uncoated paper: Changes in AUVs between comparison periods

Changes in dollars per short ton

Item	2015-20	2015-16	2016-17	2017-18	2018-19	2019-20	Jan-Jun 2020-21
Total net sales	▲ 82.3	▲ 1.5	▼ (15.1)	▲ 42.8	▲ 70.0	▼ (16.8)	▼ (5.0)
Raw material costs	▲ 11.7	▲ 0.5	▲ 3.5	▲ 16.5	▲ 4.4	▼ (13.3)	▼ (38.3)
Energy costs	▲ 4.4	▼ (2.0)	▲ 3.2	▲ 2.4	▼ (0.1)	▲ 0.9	▼ (9.0)
Direct labor costs	▲ 44.2	▲ 4.7	▼ (7.5)	▲ 11.4	▲ 12.2	▲ 23.4	▼ (36.3)
Other factory costs	▲ 48.5	▲ 5.8	▼ (9.0)	▲ 37.5	▼ (19.7)	▲ 33.9	▼ (56.9)
Cost of goods sold	▲ 108.8	▲ 9.0	▼ (9.7)	▲ 67.9	▼ (3.1)	▲ 44.8	▼ (140.5)
Gross profit or (loss)	▼ (26.5)	▼ (7.5)	▼ (5.4)	▼ (25.1)	▲ 73.1	▼ (61.7)	▲ 135.6
SG&A expense	▼ (16.4)	▼ (1.0)	▲ 1.2	▼ (0.2)	▲ 4.8	▼ (21.1)	▼ (10.2)
Operating income or (loss)	▼ (10.1)	▼ (6.5)	▼ (6.6)	▼ (24.9)	▲ 68.3	▼ (40.5)	▲ 145.8
Net income or (loss)	▼ (67.1)	▲ 3.7	▼ (27.1)	▼ (84.4)	▲ 141.5	▼ (100.8)	▲ 142.0

Source: Compiled from data submitted in response to Commission questionnaires.

Net sales

As presented in table III-12, U.S. producers reported declining net sales volume and value from 2015 to 2020, reflecting declines in both U.S. commercial sales and export sales. Total net sales fell by 37.6 percent and 32.1 percent, by quantity and value, respectively from 2015 to 2020; both net sales quantity and value were lower in January to June 2021 ("interim 2021") than in January to June 2020 ("interim 2020").³⁸

As shown in table III-12, the average unit value of sales increased irregularly by 8.8 percent from 2015 to 2020 and was slightly lower in interim 2021 than in interim 2020. Sales AUVs ranged from \$924 to \$1,036 from 2015 to 2020. Differences in unit values among the U.S. producers were largely attributable to product mix, level of integration, and volume of sales in the uncoated paper market.³⁹

Cost of goods sold and gross profit or loss

Raw materials accounted for the largest share of total COGS in each year and partial year period, ranging from 41.9 to 47.9 percent of total COGS (table III-12). Wood fiber accounted for the largest share of raw material costs followed by chemicals used in the papermaking process.⁴⁰ On a value basis, raw material costs fell (reflecting the decline in net sales quantity) from 2015 to 2020 and were lower in interim 2021 than in interim 2020. On a per-unit basis, raw material costs increased irregularly from \$376 in 2015 to \$388 in 2020 but were lower in interim 2021 than in interim 2020 (table III-12). Company-specific per-short ton raw material costs varied widely within the industry, primarily attributable to the level of vertical integration and the form of primary inputs used to produce uncoated paper.⁴¹ Table III-14 presents raw materials, by type.⁴²

³⁸ Table G-1 shows that all but one firm (***) reported reduced sales quantity and value from 2015 to 2020. At the beginning of the period for which data was collected, ***, as a result, its sales increases from 2015 to 2020. See table III-1 and staff telephone interview with ***.

³⁹ With the exception of U.S. producer ***, *** consistently reported ***, ranging from \$*** to \$*** per short ton (table G-1).

⁴⁰ Chemicals listed by U.S. producers include precipitated calcium carbonate (PCC/GCC), sodium chlorate, starch, bleach, optical brighteners, and other additives.

⁴¹ As shown in table G-1, the highest unit values were calculated from the data ***, while the lowest values were those of ***.

⁴² One firm (***) reported ***. ***, *** U.S. producer questionnaire, III-7a.

Table III-14
Uncoated paper: Raw material costs in 2020

Value in 1,000 dollars; Unit values in dollars per short ton; Share of value in percent

Item	Value	Unit value	Share of value
Wood fiber	330,726	146	37.7
Pulp	81,129	36	9.3
Chemicals	283,319	125	32.3
Other material inputs	181,797	80	20.7
All raw materials	876,970	388	100.0

Note: Total raw materials value in table III-12 is slightly higher (by .04 percent) due to rounding differences.

Source: Compiled from data submitted in response to Commission questionnaires.

Other factory costs (including fixed and variable manufacturing overhead costs but excluding energy costs) were the second largest component of COGS, ranging from 31.9 to 34.1 percent of total COGS from 2015 to 2020 (table III-12). The per-short ton other factory costs fluctuated but increased overall from \$259 to \$308 during this period. Other factory costs AUVs were lower in interim 2021 than in interim 2020. U.S. producers reported large fluctuations in other factory costs per-short ton from 2015 to 2020 and for the interim periods (table G-1).^{43 44} Direct labor was the third largest component of COGS, accounting for between 12.5 to 16.2 percent of total COGS from 2015 to 2020 (table III-12). The per-short ton cost of direct labor increased irregularly, from \$102 in 2015 to \$147 in 2020 and was lower in interim 2021 than in interim 2020.

Energy costs made up the smallest share of COGS, ranging from 6.8 percent to 7.3 percent of total COGS (table III-12). The per-short ton energy costs fluctuated but increased overall, from \$57 in 2015 to \$62 in 2020 but was lower in interim 2021 than in interim 2020.

As presented in table III-12, total COGS to sales ratio increased irregularly from 84.8 to 88.7 percent from 2015 to 2020 but were lower in interim 2021 than in interim 2020.⁴⁵ Table III-12 shows that unit COGS fluctuated but increased overall from \$795 in 2015 to \$904 in 2020;

⁴³ *** per-short ton other factory costs, these fluctuated from 2015 to 2020, reflecting fluctuations in its net sales quantity. ***'s per-short ton other factory costs were lower in interim 2021 than in interim 2020.

⁴⁴ *** reported the largest variation in per-short ton other factory costs, ***.

⁴⁵ The high COGS to sales ratios reported by U.S. producers is partially attributable to plant closures, shutdowns, and repurposing uncoated paper facilities to produce other products. Two U.S. producers (***) reported selling uncoated paper at prices lower than their COGS for several periods from 2015 to 2020, resulting in COGS to sales ratio of over 100 percent. As of early 2019, *** is no longer operating any uncoated paper facility in the United States. See table III-2 for additional information on changes in U.S. producers' operations.

unit COGS was lower in interim 2021 than in interim 2020. Company-specific differences in the direction of unit COGS reflect variations in both average raw material costs and conversion costs (combined direct labor, other factory, and energy costs).^{46 47}

Gross profit fluctuated from \$514.9 million in 2015 to \$261.3 million in 2020 and was higher in interim 2021 than in 2020 (table III-12).⁴⁸

SG&A expenses and operating income or loss

As presented in table III-12, SG&A expenses declined irregularly from 2015 to 2020 and were lower in interim 2021 than in interim 2020. The SG&A expense ratio (i.e., total SG&A expenses divided by total revenue) irregularly decreased from 6.6 percent to 4.4 percent from 2015 to 2020 and was lower in interim 2021 than in interim 2020.⁴⁹

Operating income reflected the changes in sales and costs/expenses, declining irregularly from \$292.4 million in 2015 to \$159.5 million in 2020; operating income was higher in interim 2021 than in interim 2020 (table III-12). The number of companies reporting operating income declines year-to-year increased from three U.S. producers *** at the beginning of the period (2015-16) to *** U.S. producers at the end of the annual period (2019-20).⁵⁰

⁴⁶ *** U.S. producers *** reported the highest increases in unit COGS from 2015 to 2020 (see table G-1).

⁴⁷ Industry witnesses testified at the hearing that shutdowns caused by COVID-19 pandemic led to fewer orders; however, their fixed costs stayed high resulted in the high COGS to net sales ratios in interim 2020. In addition, the industry realigned its capacity (throughout the period, especially in 2020) to reduce fixed costs, converting uncoated paper machines to other products (e.g., container paper). Hearing transcript, p. 116 (Melton) and p. 117 (LeBlanc); domestic interested parties' posthearing brief, exh. 1, p. 88-90.

⁴⁸ *** are the only U.S. producer reporting negative gross profits in any full year period for which data were collected. *** accounted for the largest decline in gross profit from 2015 to 2020 and reported gross losses in interim 2020, reflecting COGS that increased at rates higher than sales price (see table G-1).

⁴⁹ On a company-specific basis (see table G-1), U.S. producers reported a wide range of SG&A expense ratios, with *** reporting the largest increase from 2015 to 2020 ***. Small producer ***. Email from ***, November 29, 2021. *** U.S. producers (***) *** and reported fluctuating but overall declining SG&A expense ratios as a result of SG&A expenses that generally declined more than net sales values.

⁵⁰ The count of U.S. producers' declining operating profits from 2019-20 ***. U.S. producers *** accounted for most of the operating income declines from 2015 to 2020 (see table G-1).

All other expenses and net income or loss

Classified below the operating income level are interest expense, and all other expenses or income, which are usually allocated to the subject product from high levels in the corporation. In table III-12, these items are aggregated with the net amount shown. "All other expenses/income, net" reflect net expenses throughout the reporting period, and fluctuated but increased overall from 2015 to 2020. Net expenses were higher in interim 2021 than in interim 2020.⁵¹ Net income followed the same directional trend as operating income throughout the period for which data were collected.⁵²

Capital expenditures and research and development expenses

Table III-15 presents capital expenditures, by firm, and table III-17 presents R&D expenses, by firm. Tables III-16 and III-18 present the firms' narrative explanations of the nature, focus, and significance of their capital expenditures and R&D expenses, respectively.⁵³

Table III-15

Uncoated paper: U.S. producers' capital expenditures, by firm and period

Value in 1,000 dollars; zeroes and null values are suppressed and shown as "---".

Firm	2015	2016	2017
Boise	***	***	***
Domtar	***	***	***
Finch Paper	***	***	***
Georgia-Pacific	***	***	***
International Paper	***	***	***
NORPAC	***	***	***
Performance Office Paper	***	***	***
Pixelle	***	***	***
All firms	***	***	***

Table continued.

⁵¹ A positive number for "all other income/expenses, net" indicates that interest expense and all other expenses were higher than all other income (i.e., it had a negative effect on net income). The large "all other income/expenses, net" costs in 2017 and 2018 ***. In 2020, U.S. producer (***) reported nonrecurring "all other expenses" of \$*** from ***. U.S. producers questionnaire, III-10.

⁵² A variance analysis is not shown due to large differences in product mix, production of other products, and the extent of vertical integration of U.S. producers. These differences result in wide variations in the costs allocated to uncoated paper operations as well as the cost structures among the reporting firms.

⁵³ A hearing witness for Domtar testified that a comparable paper facility would cost \$1.5 billion dollars to build today. Hearing transcript, p. 28 (Melton).

Table III-15—Continued

Uncoated paper: U.S. producers' capital expenditures, by firm and period

Value in 1,000 dollars; zeroes and null values are suppressed and shown as "—".

Firm	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Boise	***	***	***	***	***
Domtar	***	***	***	***	***
Finch Paper	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
International Paper	***	***	***	***	***
NORPAC	***	***	***	***	***
Performance Office Paper	***	***	***	***	***
Pixelle	***	***	***	***	***
All firms	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table III-16

Uncoated paper: Narrative descriptions of U.S. producers' capital expenditures, by firm

Firm	Narrative explanation
Boise	***
Domtar	***
Finch Paper	***
Georgia-Pacific	***
International Paper	***
NORPAC	***
Performance Office Paper	***
Pixelle	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table III-17

Uncoated paper: U.S. producers' R&D expenses, by firm and period

Value in 1,000 dollars; zeroes and null values are suppressed and shown as "---".

Firm	2015	2016	2017
Boise	***	***	***
Domtar	***	***	***
Finch Paper	***	***	***
Georgia-Pacific	***	***	***
International Paper	***	***	***
NORPAC	***	***	***
Performance Office Paper	***	***	***
Pixelle	***	***	***
All firms	***	***	***

Table continued.

Table III-17—Continued

Uncoated paper: U.S. producers' R&D expenses, by firm and period

Value in 1,000 dollars; zeroes and null values are suppressed and shown as "---".

Firm	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Boise	***	***	***	***	***
Domtar	***	***	***	***	***
Finch Paper	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
International Paper	***	***	***	***	***
NORPAC	***	***	***	***	***
Performance Office Paper	***	***	***	***	***
Pixelle	***	***	***	***	***
All firms	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table III-18

Uncoated paper: Narrative descriptions of U.S. producers R&D expenses, by firm

Firm	Narrative explanation
Boise	***
Domtar	***
Finch Paper	***
International Paper	***
NORPAC	***
Performance Office Paper	***
Pixelle	***

Source: Compiled from data submitted in response to Commission questionnaires.

Assets and return on assets

Table III-19 presents data on the U.S. producers' total net assets, while table III-20 presents their operating ROA.⁵⁴ ⁵⁵ Table III-21 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time. Fixed asset values reflect an allocation to uncoated paper from total production, such as by the relative share of production or sales of uncoated paper to the total.⁵⁶ Current assets are also allocated.

Table III-19
Uncoated paper: U.S. producers' total net assets, by firm and period

Value in 1,000 dollars

Firm	2015	2016	2017	2018	2019	2020
Boise	***	***	***	***	***	***
Domtar	***	***	***	***	***	***
Finch Paper	***	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***	***
International Paper	***	***	***	***	***	***
NORPAC	***	***	***	***	***	***
Performance Office Paper	***	***	***	***	***	***
Pixelle	***	***	***	***	***	***
All firms	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

⁵⁴ Total net assets include current and non-current assets, associated with the production, warehousing, and sale of uncoated paper.

⁵⁵ The operating ROA is calculated as operating income divided by total assets. With respect to a firm's overall operations, the total asset value reflects an aggregation of a number of assets which are generally not product specific. Thus, high-level allocations are generally required in order to report a total asset value for uncoated paper.

⁵⁶ In the original investigations, petitioners estimated a new paper machine installed in an existing paper mill with supporting pulp product to cost in excess of \$600 million and a new greenfield pulp and paper mill to cost in excess of \$1 billion. The cost of a sheeting line was estimated at \$15 to \$20 million. The cost of switching sheeting sizes would be \$500,000 to \$600,000 to permit sheeting of different sizes (e.g., switching from international to U.S. sizes or vice-versa). These estimates were provided in 2016. *Certain Uncoated Paper from Australia, Brazil, China, Indonesia, and Portugal*, Inv. Nos. 701-TA-528-529 and 731-TA-1264-1268 (Final), USITC Publication 4592, February 2016, p. VI-7, footnote 18.

Table III-20
Uncoated paper: U.S. producers' ROA, by firm and period

Ratio in percent

Firm	2015	2016	2017	2018	2019	2020
Boise	***	***	***	***	***	***
Domtar	***	***	***	***	***	***
Finch Paper	***	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***	***
International Paper	***	***	***	***	***	***
NORPAC	***	***	***	***	***	***
Performance Office Paper	***	***	***	***	***	***
Pixelle	***	***	***	***	***	***
All firms	***	***	***	***	***	***

Note: Ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Source: Compiled from data submitted in response to Commission questionnaires.

Table III-21
Uncoated paper: Narrative descriptions of U.S. producers' total net assets, by firm

Firm	Narrative explanation
Boise	***
Domtar	***
Georgia-Pacific	***
International Paper	***
NORPAC	***
Performance Office Paper	***
Pixelle	***

Source: Compiled from data submitted in response to Commission questionnaires.

EACB NC

1971

1972

1973

1974

1975

1976

1977

1978

1979

1980

1981

1982

1983

1984

1985

1986

1987

1988

1989

1990

1991

1992

1993

1994

1995

1996

1997

1998

1999

2000

2001

2002

2003

2004

2005

2006

2007

2008

2009

2010

2011

2012

2013

2014

2015

2016

2017

2018

2019

2020

2021

2022

2023

2024

2025

2026

2027

2028

2029

2030

2031

2032

2033

2034

2035

2036

2037

2038

2039

2040

2041

2042

2043

2044

2045

2046

2047

2048

2049

2050

2051

2052

2053

2054

2055

2056

2057

2058

2059

2060

2061

2062

2063

2064

2065

2066

2067

2068

2069

2070

2071

2072

2073

2074

2075

2076

2077

2078

2079

2080

2081

2082

2083

2084

2085

2086

2087

2088

2089

2090

2091

2092

2093

2094

2095

2096

2097

2098

2099

2100

2101

2102

2103

2104

2105

2106

2107

2108

2109

2110

2111

2112

2113

2114

2115

2116

2117

2118

2119

2120

2121

2122

2123

2124

2125

2126

2127

2128

2129

2130

2131

2132

2133

2134

2135

2136

2137

2138

2139

2140

2141

2142

2143

2144

2145

2146

2147

2148

2149

2150

Part IV: U.S. imports and the foreign industries

U.S. imports

Overview

The Commission issued questionnaires to 110 potential importers of uncoated paper between 2015 and 2020.¹ Seventeen firms provided data and information in response to the questionnaires, while thirteen firms indicated that they had not imported product during the period for which data were collected.² Based on official Commerce statistics for imports of uncoated paper, importers' questionnaire data accounted for *** percent of total U.S. imports during 2020 and *** percent of total subject imports during 2020. Firms responding to the Commission's questionnaire accounted for the following shares of individual subject country's subject imports (as a share of official import statistics, by quantity) during 2020.

- *** percent of subject imports from Australia, China, and Indonesia during 2020³ ⁴
- *** percent of the subject imports from Brazil during 2020
- *** percent of the subject imports from Portugal during 2020⁵
- *** percent of nonsubject imports during 2020

¹ The Commission issued questionnaires to those firms identified in responses to the notice of institution, along with firms that, based on a review of data from third-party sources, may have imported more than one percent of total imports under HTS statistical reporting numbers 4802.56.1000, 4802.56.2000, 4802.56.3000, 4802.56.4000, 4802.56.6000, 4802.56.7020, 4802.56.7040, 4802.56.7050, 4802.56.7090, 4802.57.1000, 4802.57.1020, 4802.57.1040, 4802.57.1090, 4802.57.2000, 4802.57.3000, 4802.57.4000, 4802.57.4020, 4802.57.4040, and 4802.57.4090 in any year since 2015.

² Three U.S. importers that responded to the questionnaire, ***, ***, and *** were removed from the data due to reporting importing only a small quantity of uncoated paper during 2015-20. ***, ***, and ***.

³ *** firm reported imports from Australia and ***. *** accounted for *** percent of imports from Australia in 2015. According to official Commerce statistics, there was one short ton imported from Australia into the U.S. in 2020.

⁴ Responding firms *** from China in 2015, accounting for *** percent of imports from China in that year. Responding firms *** from Indonesia in 2015 and 2018, accounting for *** and *** percent of imports respectively. According to official Commerce statistics, there were 189 short tons of imports from Indonesia in 2020.

⁵ The coverage percentage of imports from Portugal is *** percent because, *** Email from ***, October 22, 2021.

In light of the data coverage by the Commission's questionnaires, import data from China and Indonesia are based on *official Commerce statistics* while import data from Australia, Brazil, and Portugal are based on *questionnaire responses*.⁶

The Commission requested data on imports of 83+/-1 percent bright uncoated paper from Australia, Brazil, China, Indonesia, and Portugal as a result of Commerce's affirmative anti-circumvention determination.⁷ Additionally, the Commission requested data on out-of-scope sheeter rolls as a result of Commerce's affirmative determination that that imports of certain uncoated paper rolls from Brazil, China, and Indonesia are circumventing the antidumping duty orders on uncoated paper from Brazil, China, and Indonesia, and that imports of certain uncoated paper rolls from China and Indonesia are circumventing the countervailing duty orders on uncoated paper from China and Indonesia.⁸ One importer reported that the majority of their imports from Brazil entered directly into a foreign trade zone (FTZ) and were not entered into the United States for consumption. Therefore, those imports are omitted in the report.⁹

Imports from subject and nonsubject countries

Table IV-1 and figure IV-1 present information on U.S. imports of uncoated paper from Australia, Brazil, China, Indonesia, Portugal, and all other sources during 2015-20, January-June ("interim") 2020, and interim 2021. Questionnaire data and official Commerce statistics indicate the quantity of imports of uncoated paper from subject sources declined *** percent from 2015 to 2020.¹⁰ However, imports of uncoated paper from subject sources were *** percent higher in interim 2021 than in interim 2020.¹¹ Imports from nonsubject sources, by quantity, increased by *** percent during 2015-19, but then decreased by *** percent from 2019 to 2020, ending *** percent higher in 2020 than in 2015. Imports from nonsubject sources saw the largest increase in 2016-17 of *** percent, driven by *** and

⁶ Official U.S. import statistics using HTS statistical reporting numbers 4802.56.1000, 4802.56.2000, 4802.56.3000, 4802.56.4000, 4802.56.6000, 4802.56.7020, 4802.56.7040, 4802.56.7050, 4802.56.7090, 4802.57.1000, 4802.57.1020, 4802.57.1040, 4802.57.1090, 4802.57.2000, 4802.57.3000, 4802.57.4000, 4802.57.4020, 4802.57.4040, and 4802.57.4090 accessed October 21, 2021.

⁷ 82 FR 41610, September 1, 2017.

⁸ 86 FR 71025, December 14, 2021.

⁹ Email from ***, August 20, 2021.

¹⁰ See appendix D for producer, importer, and importer responses to questions on the impact of COVID-19.

¹¹ This increase is driven by *** who both claim that the increase is driven by ***. Email from ***, September 27, 2021. Email from ***, September 27, 2021.

***. ¹² Nonsubject imports were *** percent higher in interim 2021 than in interim 2020. The difference between the interim periods was driven by ***.¹³ ¹⁴ The three largest nonsubject sources in 2020 were Canada, Thailand, and Finland. ¹⁵

¹² *** Email from ***, October 11, 2021. *** Email from ***, September 22, 2021.

¹³ *** attributed the increase to ***. Email from ***, September 23, 2021.

¹⁴ Contrarily, *** reported fewer imports in interim 2021 than interim 2020 because the ***. Email from ***, September 22, 2021.

¹⁵ According to official import statistics, 72.4 percent of imports of uncoated paper in 2020 were from nonsubject sources. In 2020, 27.4 percent of all U.S. imports of uncoated paper were from Canada.

Table IV-1
Uncoated paper: U.S. imports by source and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short tons

Source	Measure	2015	2016	2017
Australia	Quantity	***	***	***
Brazil	Quantity	***	***	***
China	Quantity	36,241	732	604
Indonesia	Quantity	148,520	43,339	15,317
Portugal	Quantity	***	***	***
Subject sources	Quantity	***	***	***
Nonsubject sources	Quantity	***	***	***
All import sources	Quantity	639,430	433,469	421,441
Australia	Value	***	***	***
Brazil	Value	***	***	***
China	Value	29,394	901	825
Indonesia	Value	129,380	40,944	13,453
Portugal	Value	***	***	***
Subject sources	Value	***	***	***
Nonsubject sources	Value	***	***	***
All import sources	Value	581,031	397,245	378,447
Australia	Unit value	***	***	***
Brazil	Unit value	***	***	***
China	Unit value	811	1,232	1,365
Indonesia	Unit value	871	945	878
Portugal	Unit value	***	***	***
Subject sources	Unit value	***	***	***
Nonsubject sources	Unit value	***	***	***
All import sources	Unit value	909	916	898

Table continued.

Table IV-1 Continued
 Uncoated paper: U.S. imports by source and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short tons

Source	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Australia	Quantity	***	***	***	***	***
Brazil	Quantity	***	***	***	***	***
China	Quantity	461	2,462	1,390	1,138	58
Indonesia	Quantity	12,280	21,749	189	189	---
Portugal	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	393,654	425,298	352,848	171,522	215,852
Australia	Value	***	***	***	***	***
Brazil	Value	***	***	***	***	***
China	Value	627	2,868	2,008	1,543	211
Indonesia	Value	11,657	19,449	144	144	---
Portugal	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	362,071	417,544	329,808	160,354	192,385
Australia	Unit value	***	***	***	***	***
Brazil	Unit value	***	***	***	***	***
China	Unit value	1,359	1,165	1,445	1,356	3,603
Indonesia	Unit value	949	894	765	765	---
Portugal	Unit value	***	***	***	***	***
Subject sources	Unit value	***	***	***	***	***
Nonsubject sources	Unit value	***	***	***	***	***
All import sources	Unit value	920	982	935	935	891

Table continued.

Table IV-1 Continued
 Uncoated paper: Share of U.S. imports by source and period

Share and ratio in percent

Source	Measure	2015	2016	2017
Australia	Share of quantity	***	***	***
Brazil	Share of quantity	***	***	***
China	Share of quantity	5.7	0.2	0.1
Indonesia	Share of quantity	23.2	10.0	3.6
Portugal	Share of quantity	***	***	***
Subject sources	Share of quantity	***	***	***
Nonsubject sources	Share of quantity	***	***	***
All import sources	Share of quantity	100.0	100.0	100.0
Australia	Share of value	***	***	***
Brazil	Share of value	***	***	***
China	Share of value	5.1	0.2	0.2
Indonesia	Share of value	22.3	10.3	3.6
Portugal	Share of value	***	***	***
Subject sources	Share of value	***	***	***
Nonsubject sources	Share of value	***	***	***
All import sources	Share of value	100.0	100.0	100.0
Australia	Ratio	***	***	***
Brazil	Ratio	***	***	***
China	Ratio	1.0	0.0	0.0
Indonesia	Ratio	4.1	1.2	0.4
Portugal	Ratio	***	***	***
Subject sources	Ratio	***	***	***
Nonsubject sources	Ratio	***	***	***
All import sources	Ratio	17.6	12.3	12.0

Table continued.

PAGE NO

Table IV-1 Continued

Uncoated paper: Share of U.S. imports by source and period

Share and ratio in percent

Source	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Australia	Share of quantity	***	***	***	***	***
Brazil	Share of quantity	***	***	***	***	***
China	Share of quantity	0.1	0.6	0.4	0.7	0.0
Indonesia	Share of quantity	3.1	5.1	0.1	0.1	---
Portugal	Share of quantity	***	***	***	***	***
Subject sources	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
Australia	Share of value	***	***	***	***	***
Brazil	Share of value	***	***	***	***	***
China	Share of value	0.2	0.7	0.6	1.0	0.1
Indonesia	Share of value	3.2	4.7	0.0	0.1	---
Portugal	Share of value	***	***	***	***	***
Subject sources	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
Australia	Ratio	***	***	***	***	***
Brazil	Ratio	***	***	***	***	***
China	Ratio	0.0	0.1	0.1	0.1	0.0
Indonesia	Ratio	0.4	0.7	0.0	0.0	---
Portugal	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	11.5	13.3	16.0	15.3	20.8

Source: Compiled from data submitted in response to Commission questionnaires and Official U.S. import statistics using HTS statistical reporting numbers 4802.56.1000, 4802.56.2000, 4802.56.3000, 4802.56.4000, 4802.56.6000, 4802.56.7020, 4802.56.7040, 4802.56.7050, 4802.56.7090, 4802.57.1000, 4802.57.1020, 4802.57.1040, 4802.57.1090, 4802.57.2000, 4802.57.3000, 4802.57.4000, 4802.57.4020, 4802.57.4040, and 4802.57.4090 accessed October 21, 2021.

Note: Data for imports from China and Indonesia are based on official Commerce statistics. Data for all other sources are based on questionnaire responses. Share of quantity is the share of all U.S. imports by quantity; share of value is the share of all U.S. imports by value; and ratio are U.S. imports to U.S. production. Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure IV-1

Uncoated paper: U.S. import quantities and average unit values by period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires and Official U.S. import statistics using HTS statistical reporting numbers 4802.56.1000, 4802.56.2000, 4802.56.3000, 4802.56.4000, 4802.56.6000, 4802.56.7020, 4802.56.7040, 4802.56.7050, 4802.56.7090, 4802.57.1000, 4802.57.1020, 4802.57.1040, 4802.57.1090, 4802.57.2000, 4802.57.3000, 4802.57.4000, 4802.57.4020, 4802.57.4040, and 4802.57.4090 accessed October 21, 2021.

Cumulation considerations

In assessing whether U.S. imports from the subject countries are likely to compete with each other and with the domestic like product, the Commission has generally considered four factors: (1) fungibility, (2) presence of sales or offers to sell in the same geographical markets, (3) common or similar channels of distribution, and (4) simultaneous presence in the market. Information regarding channels of distribution, market areas, and interchangeability appear in Part II. Additional information concerning fungibility, geographical markets, and simultaneous presence in the market is presented below.

PAGE NO

Fungibility

Table IV-2 and figure IV-2 present U.S. producers' and U.S. importers' U.S. shipments by type (plain white letter size and all other) and source in 2020. Plain letter white sized accounted for the majority of U.S. producers' U.S. shipments and U.S. shipments of imports from Brazil and Portugal in 2020. There were no shipments of imports of uncoated paper from Australia or Indonesia in 2020 and just *** of U.S. shipments of imports from China. Plain letter white sized accounted for the majority of U.S. shipments of subject imports in 2020 (***) percent). Plain white letter size accounted for the majority of U.S. shipments by U.S. producers and subject sources at *** percent and *** percent, respectively.

Table IV-2

Uncoated paper: U.S. producers' and U.S. importers' U.S. shipments by type and source, 2020

Quantity in short tons

Source	Plain white letter size	All other	All types
U.S. producers	***	***	2,143,775
Australia	***	***	***
Brazil	***	***	***
China	***	***	***
Indonesia	***	***	***
Portugal	***	***	***
Subject sources	***	***	***
All sources	***	***	***

Table continued.

Table IV-2 Continued

Uncoated paper: U.S. producers' and U.S. importers' U.S. shipments by type and source, 2020

Share across in percent

Source	Plain white letter size	All other	All types
U.S. producers	***	***	***
Australia	***	***	***
Brazil	***	***	***
China	***	***	***
Indonesia	***	***	***
Portugal	***	***	***
Subject sources	***	***	***
All sources	***	***	***

Table continued.

Table IV-2 Continued
Uncoated paper: U.S. producers' and U.S. importers' U.S. shipments by type and source, 2020

Share down in percent

Source	Plain white letter size	All other	All types
U.S. producers	***	***	***
Australia	***	***	***
Brazil	***	***	***
China	***	***	***
Indonesia	***	***	***
Portugal	***	***	***
Subject sources	***	***	***
All sources	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeros, null values, and undefined calculations are suppressed and shown as "---".

Figure IV-2
Uncoated paper: U.S. producers' and U.S. importers' U.S. shipments by type and source, 2020

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Table IV-3 and figure IV-3 presents data on foreign producers' total shipments by type in 2020. The majority of shipments of uncoated paper by Australia, Brazil, Indonesia, and Portugal are plain, white other dimensions, ranging from *** percent to *** percent of all types.

Table IV-3
Uncoated paper: Foreign producers' total shipments by type and source, 2020

Quantity in short tons

Source	Plain white letter size	Plain white other dimensions	All other	All types
U.S producers	***	***	***	2,143,775
Australia producers	***	***	***	***
Brazil producers	***	***	***	***
China producers	***	***	***	***
Indonesia producers	***	***	***	***
Portugal producers	***	***	***	***
Subject sources	***	***	***	***
U.S. and subject producers	***	***	***	***

Table continued.

Table IV-3 Continued
Uncoated paper: Foreign producers' total shipments by type and source, 2020

Share across in percent

Source	Plain white letter size	Plain white other dimensions	All other	All types
U.S producers	***	***	***	***
Australia producers	***	***	***	***
Brazil producers	***	***	***	***
China producers	***	***	***	***
Indonesia producers	***	***	***	***
Portugal producers	***	***	***	***
Subject sources	***	***	***	***
U.S. and subject producers	***	***	***	***

Table continued.

Table IV-3 Continued

Uncoated paper: Foreign producers' total shipments by type and source, 2020

Share down in percent

Source	Plain, white letter size	Plain, white other dimensions	All other	All types
U.S producers	***	***	***	***
Australia producers	***	***	***	***
Brazil producers	***	***	***	***
China producers	***	***	***	***
Indonesia producers	***	***	***	***
Portugal producers	***	***	***	***
Subject sources	***	***	***	***
U.S. and subject producers	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure IV-3

Uncoated paper: Foreign producers' total shipments by type and source, 2020

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

FACT NO

Geographical markets

Uncoated paper produced in the United States is shipped nationwide (see Part II for more information on geographic markets). U.S. imports of subject merchandise from Australia, Brazil, China, Indonesia, and Portugal entered multiple U.S. ports of entry across the nation. Table IV-4 presents U.S. imports of uncoated paper, by source and border of entry in 2020, based on official import statistics. The vast majority of imports of uncoated paper from subject sources (79.2 percent) entered through the eastern border of entry.¹⁶ The majority of imports from Brazil and Portugal (86.3 percent and 76.8 percent, respectively) entered the United States in 2020 through ports located in the East. The majority of imports from Indonesia (63.8 percent) and 92.4 percent of imports from China entered the United States through ports located on the southern border in 2020. The majority of imports from nonsubject countries (50.5 percent) entered the United States through ports located in the East.

Table IV-4
Uncoated paper: Quantity of U.S. imports by border of entry, 2020

Quantity in short tons

Source	East	North	South	West	All borders
Australia	1	---	---	---	1
Brazil	39,053	---	3,333	2,882	45,268
China	23	23	1,284	60	1,390
Indonesia	---	---	120	68	189
Portugal	63,040	5,858	10,362	2,817	82,077
Subject sources	102,118	5,881	15,099	5,827	128,925
Nonsubject sources	171,200	80,738	50,566	36,250	338,755
All import sources	273,318	86,619	65,666	42,077	467,680

Table continued.

¹⁶ According to Official Commerce Statistics, there were no reported imports of uncoated paper from Australia in 2020.

Table IV-4 Continued

Uncoated paper: Share of quantity of U.S. imports by border of entry region, 2020

Share in percent

Source	East	North	South	West	All borders
Australia	100.0	---	---	---	100.0
Brazil	86.3	---	7.4	6.4	100.0
China	1.7	1.6	92.4	4.3	100.0
Indonesia	---	---	63.8	36.2	100.0
Portugal	76.8	7.1	12.6	3.4	100.0
Subject sources	79.2	4.6	11.7	4.5	100.0
Nonsubject sources	50.5	23.8	14.9	10.7	100.0
All import sources	58.4	18.5	14.0	9.0	100.0

Table continued.

Table IV-4 Continued

Uncoated paper: Share of quantity of U.S. imports by source, 2020

Share in percent

Source	East	North	South	West	All borders
Australia	0.0	---	---	---	0.0
Brazil	14.3	---	5.1	6.8	9.7
China	0.0	0.0	2.0	0.1	0.3
Indonesia	---	---	0.2	0.2	0.0
Portugal	23.1	6.8	15.8	6.7	17.5
Subject sources	37.4	6.8	23.0	13.8	27.6
Nonsubject sources	62.6	93.2	77.0	86.2	72.4
All import sources	100.0	100.0	100.0	100.0	100.0

Source: Official U.S. import statistics using HTS statistical reporting numbers 4802.56.1000, 4802.56.2000, 4802.56.3000, 4802.56.4000, 4802.56.6000, 4802.56.7020, 4802.56.7040, 4802.56.7050, 4802.56.7090, 4802.57.1000, 4802.57.1020, 4802.57.1040, 4802.57.1090, 4802.57.2000, 4802.57.3000, 4802.57.4000, 4802.57.4020, 4802.57.4040, and 4802.57.4090 accessed October 21, 2021.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeros, null values, and undefined calculations are suppressed and shown as "---".

Presence in the market

Uncoated paper produced in the United States was present in the market throughout the period for which data were collected. Tables IV-5 and IV-6 and figures IV-4 and IV-5 present monthly data for U.S. imports of uncoated paper from subject and nonsubject sources between January 2015 and December 2020. Imports from Brazil and Portugal were present in each month during this period. Imports from China were present in 75 out of 79 months, imports from Indonesia were present in 59 out of 79 months, and imports from Australia were present in 13 out of 79 months.

Table IV-5
Uncoated paper: Quantity of U.S. imports, by month

Quantity in short tons

Year	Month	Australia	Brazil	China	Indonesia	Portugal
2015	January	4,326	19,757	4,615	17,472	5,664
2015	February	4,852	17,567	3,694	18,832	19,400
2015	March	6,290	16,444	6,996	23,432	17,374
2015	April	6,850	8,945	7,776	22,533	9,554
2015	May	7,105	15,816	6,523	32,370	18,868
2015	June	5,649	16,401	2,416	24,856	18,773
2015	July	8,337	12,459	230	746	15,438
2015	August	4,284	6,910	2,599	2,309	22,555
2015	September	---	8,904	680	462	18,644
2015	October	---	4,486	56	500	11,316
2015	November	43	4,832	632	2,149	22,658
2015	December	---	7,049	24	2,859	8,411
2016	January	---	2,644	11	10,226	1,928
2016	February	---	5,298	140	6,758	17,370
2016	March	---	11,139	3	344	18,261
2016	April	---	8,968	16	1,832	11,367
2016	May	---	10,631	63	2,139	13,876
2016	June	---	10,300	127	4,677	12,770
2016	July	---	5,441	34	1,238	12,044
2016	August	---	11,433	12	5,127	15,344
2016	September	---	4,630	70	3,339	12,241
2016	October	23	6,628	24	2,705	16,827
2016	November	---	5,817	231	3,142	11,110
2016	December	---	6,362	0	1,812	6,793

Table continued.

PAGE 60

Table IV-5 Continued
Uncoated paper: Quantity of U.S. imports, by month

Quantity in short tons

Year	Month	Australia	Brazil	China	Indonesia	Portugal
2017	January	---	3,565	8	2,243	3,639
2017	February	---	5,936	2	1,573	8,400
2017	March	---	7,996	1	854	13,704
2017	April	---	10,469	141	1,224	14,137
2017	May	---	7,217	52	1,165	9,518
2017	June	---	3,654	3	1,442	9,708
2017	July	---	5,260	6	489	3,333
2017	August	---	6,936	12	2,270	12,992
2017	September	---	2,952	315	1,833	15,116
2017	October	---	2,409	58	1,110	8,402
2017	November	---	3,400	4	844	13,565
2017	December	---	2,203	4	271	9,919
2018	January	---	1,281	7	456	8,768
2018	February	---	2,099	2	430	6,317
2018	March	---	2,065	---	157	12,850
2018	April	---	1,449	---	886	16,197
2018	May	---	1,253	114	862	11,270
2018	June	---	1,200	7	161	13,200
2018	July	---	1,503	1	2,426	11,724
2018	August	---	1,551	94	2,030	11,569
2018	September	---	1,484	1	578	12,920
2018	October	---	2,368	109	621	10,776
2018	November	---	3,979	42	2,814	11,811
2018	December	---	4,634	85	857	8,803

Table continued.

Table IV-5 Continued
 Uncoated paper: Quantity of U.S. imports, by month

Quantity in short tons

Year	Month	Australia	Brazil	China	Indonesia	Portugal
2019	January	---	4,164	---	859	9,023
2019	February	---	4,463	242	830	7,129
2019	March	---	3,927	---	822	13,735
2019	April	---	7,148	421	5,834	8,150
2019	May	---	7,826	377	8,703	8,504
2019	June	---	12,364	9	989	13,544
2019	July	---	5,981	378	2,540	9,508
2019	August	---	2,780	147	96	11,977
2019	September	70	7,050	247	980	10,482
2019	October	105	2,810	290	98	4,958
2019	November	---	1,355	174	---	6,948
2019	December	---	383	177	---	7,743
2020	January	---	769	19	---	3,950
2020	February	---	1,379	261	---	5,420
2020	March	---	1,892	213	189	12,343
2020	April	---	4,878	291	---	6,877
2020	May	1	5,584	349	---	10,708
2020	June	---	3,820	5	---	4,766
2020	July	---	4,362	19	---	5,771
2020	August	---	2,478	5	---	2,531
2020	September	---	5,808	9	---	8,311
2020	October	---	2,732	197	---	8,343
2020	November	---	3,534	19	---	5,509
2020	December	---	8,033	3	---	7,548

Table continued.

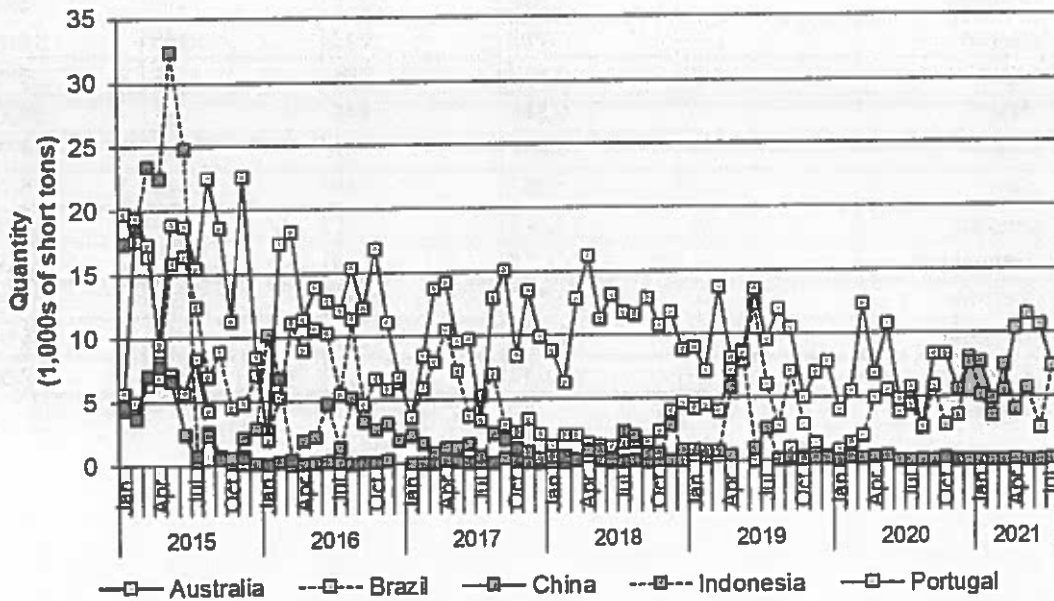
Table IV-5 Continued
Uncoated paper: Quantity of U.S. imports, by month

Quantity in short tons

Year	Month	Australia	Brazil	China	Indonesia	Portugal
2021	January	---	5,076	2	---	7,656
2021	February	---	3,491	2	---	4,828
2021	March	---	7,466	1	---	5,450
2021	April	---	4,008	46	---	10,356
2021	May	---	5,592	3	---	11,488
2021	June	---	2,457	4	---	10,629
2021	July	---	7,400	22	---	7,395

Source: Official U.S. import statistics using HTS statistical reporting numbers 4802.56.1000, 4802.56.2000, 4802.56.3000, 4802.56.4000, 4802.56.6000, 4802.56.7020, 4802.56.7040, 4802.56.7050, 4802.56.7090, 4802.57.1000, 4802.57.1020, 4802.57.1040, 4802.57.1090, 4802.57.2000, 4802.57.3000, 4802.57.4000, 4802.57.4020, 4802.57.4040, and 4802.57.4090 accessed October 21, 2021.

Figure IV-4
Uncoated paper: U.S. imports from individual subject sources, by month and source



Source: Official U.S. import statistics using HTS statistical reporting number 4802.56.1000, 4802.56.2000, 4802.56.3000, 4802.56.4000, 4802.56.6000, 4802.56.7020, 4802.56.7040, 4802.56.7050, 4802.56.7090, 4802.57.1000, 4802.57.1020, 4802.57.1040, 4802.57.1090, 4802.57.2000, 4802.57.3000, 4802.57.4000, 4802.57.4020, 4802.57.4040, and 4802.57.4090 accessed October 21, 2021.

Table IV-6
Uncoated paper: Subject and nonsubject U.S. imports by month and source

Quantity in short tons

Year	Month	Subject sources	Nonsubject sources	All import sources
2015	January	51,834	16,585	68,420
2015	February	64,345	18,015	82,361
2015	March	70,536	16,918	87,454
2015	April	55,659	17,525	73,184
2015	May	80,683	21,061	101,744
2015	June	68,094	25,043	93,138
2015	July	37,210	19,265	56,474
2015	August	38,656	19,969	58,625
2015	September	28,689	22,365	51,054
2015	October	16,358	26,752	43,110
2015	November	30,315	29,994	60,309
2015	December	18,343	26,300	44,642
2016	January	14,809	23,887	38,696
2016	February	29,566	22,518	52,084
2016	March	29,747	25,382	55,129
2016	April	22,184	24,303	46,487
2016	May	26,710	22,741	49,451
2016	June	27,875	26,896	54,771
2016	July	18,757	27,750	46,507
2016	August	31,916	32,501	64,417
2016	September	20,279	28,368	48,647
2016	October	26,207	26,783	52,990
2016	November	20,299	29,064	49,363
2016	December	14,968	30,157	45,125

Table continued.

Table IV-6 Continued
Uncoated paper: Subject and nonsubject U.S. imports by month and source

Quantity in short tons

Year	Month	Subject sources	Nonsubject sources	All import sources
2017	January	9,456	30,297	39,753
2017	February	15,910	27,147	43,057
2017	March	22,555	34,990	57,545
2017	April	25,971	23,298	49,269
2017	May	17,952	26,915	44,867
2017	June	14,807	21,721	36,528
2017	July	9,088	20,987	30,075
2017	August	22,209	29,372	51,581
2017	September	20,215	27,604	47,819
2017	October	11,978	24,862	36,839
2017	November	17,812	25,765	43,577
2017	December	12,397	28,484	40,881
2018	January	10,512	24,365	34,878
2018	February	8,849	25,462	34,311
2018	March	15,072	26,664	41,735
2018	April	18,533	29,271	47,804
2018	May	13,499	29,438	42,937
2018	June	14,567	28,470	43,037
2018	July	15,654	30,776	46,430
2018	August	15,244	33,078	48,321
2018	September	14,983	28,387	43,370
2018	October	13,874	37,890	51,764
2018	November	18,646	35,086	53,731
2018	December	14,379	32,640	47,019

Table continued.

Table IV-6 Continued
Uncoated paper: Subject and nonsubject U.S. imports by month and source

Quantity in short tons

Year	Month	Subject sources	Nonsubject sources	All import sources
2019	January	14,046	37,302	51,347
2019	February	12,664	32,591	45,254
2019	March	18,484	38,849	57,334
2019	April	21,552	45,045	66,597
2019	May	25,410	45,949	71,359
2019	June	26,906	30,967	57,873
2019	July	18,407	40,406	58,814
2019	August	14,999	36,113	51,112
2019	September	18,828	29,524	48,352
2019	October	8,260	34,732	42,992
2019	November	8,477	24,555	33,031
2019	December	8,303	21,990	30,293
2020	January	4,739	23,343	28,082
2020	February	7,059	22,590	29,650
2020	March	14,636	25,156	39,792
2020	April	12,047	30,906	42,952
2020	May	16,642	32,140	48,782
2020	June	8,591	31,865	40,456
2020	July	10,151	29,008	39,159
2020	August	5,014	26,865	31,879
2020	September	14,129	25,733	39,862
2020	October	11,272	28,092	39,364
2020	November	9,061	29,307	38,369
2020	December	15,584	33,749	49,333

Table continued.

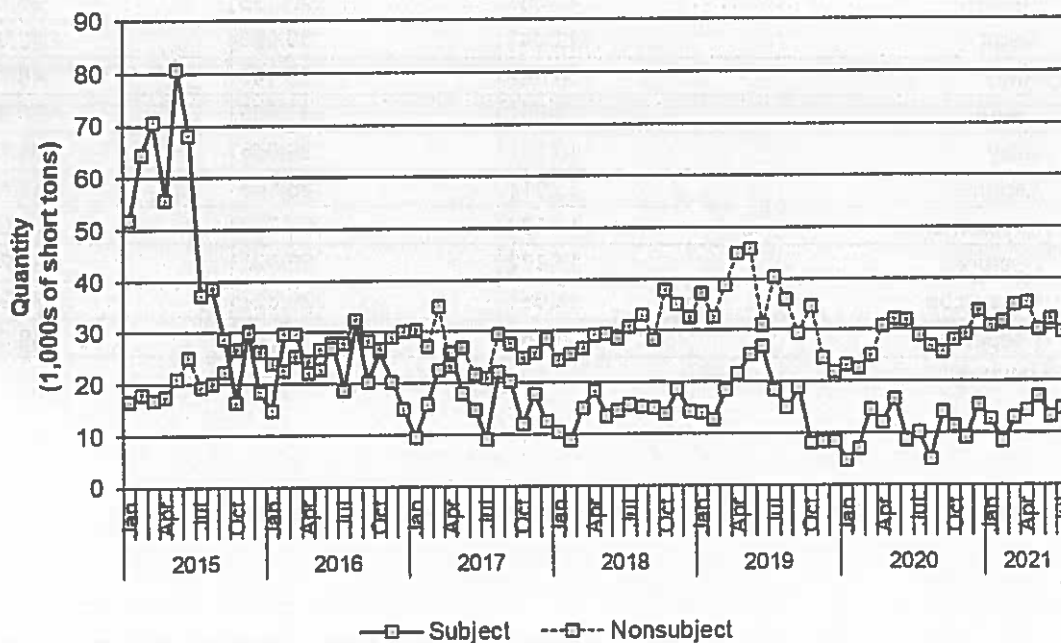
Table IV-6 Continued
Uncoated paper: Subject and nonsubject U.S. imports by month and source

Quantity in short tons

Year	Month	Subject sources	Nonsubject sources	All import sources
2021	January	12,734	30,862	43,596
2021	February	8,322	31,694	40,016
2021	March	12,917	35,014	47,931
2021	April	14,410	35,439	49,849
2021	May	17,083	30,041	47,124
2021	June	13,090	32,231	45,322
2021	July	14,817	29,748	44,565

Source: Official U.S. import statistics using HTS statistical reporting numbers 4802.56.1000, 4802.56.2000, 4802.56.3000, 4802.56.4000, 4802.56.6000, 4802.56.7020, 4802.56.7040, 4802.56.7050, 4802.56.7090, 4802.57.1000, 4802.57.1020, 4802.57.1040, 4802.57.1090, 4802.57.2000, 4802.57.3000, 4802.57.4000, 4802.57.4020, 4802.57.4040, and 4802.57.4090 accessed October 21, 2021.

Figure IV-5
Uncoated paper: U.S. imports from aggregated subject and nonsubject sources, by year and month



Source: Official U.S. import statistics using HTS statistical reporting numbers 4802.56.1000, 4802.56.2000, 4802.56.3000, 4802.56.4000, 4802.56.6000, 4802.56.7020, 4802.56.7040, 4802.56.7050, 4802.56.7090, 4802.57.1000, 4802.57.1020, 4802.57.1040, 4802.57.1090, 4802.57.2000, 4802.57.3000, 4802.57.4000, 4802.57.4020, 4802.57.4040, and 4802.57.4090 accessed October 21, 2021.

PAGE NO

U.S. importers' inventories

Table IV-8 presents data for inventories of U.S. imports of uncoated paper from Australia, Brazil, China, Indonesia, Portugal, and all other sources held in the United States.¹⁷ End-of period inventories of subject imports decreased by *** percent during 2015-19, before increasing *** percent in 2019-20, ending *** percent lower in 2020 than in 2015. This decrease was driven by ***. End-of-period inventories of subject imports were *** percent lower in interim 2021 than in interim 2020.

U.S. importers' end-of-period inventories of nonsubject imports fluctuated during 2015-20. End-of-period inventories of nonsubject imports decreased by *** percent from 2015 to 2018, but then increased by *** from 2018 to 2020, ending *** percent higher in 2020 than in 2015. The increase during 2018-20 reflects *** operations.¹⁸

¹⁷ Inventories for uncoated paper from Australia were reported *** in 2015 and inventories from China *** after 2017.

¹⁸ ***. Email from ***, October 11, 2021.

U.S. importers' imports subsequent to June 30, 2021

The Commission requested importers to indicate whether they had imported or arranged for the importation of uncoated paper from Australia, Brazil, China, Indonesia, and Portugal for delivery after June 30, 2021, presented in Table IV-7. *** importers reported that they had arranged imports for delivery after June 30, 2021, while *** importers reported no arranged imports. Importers arranged *** short tons of imports from subject sources between July 2021 and December 2021. *** reported arranged imports from any subject source after December 2021. *** importers reported that they had arranged *** short tons in imports from nonsubject sources between July 2021 to June 2022.

Table IV-7
Uncoated paper: Arranged imports by period

Quantity in short tons

Source of arranged imports	Jul-Sept 2021	Oct-Dec 2021	Jan-Mar 2022	Apr-Jun 2022	Total
Australia	***	***	***	***	***
Brazil	***	***	***	***	***
China	***	***	***	***	***
Indonesia	***	***	***	***	***
Portugal	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table IV-8 Continued

Uncoated paper: U.S. importers' end-of-period inventories of imports, by source, by period

Quantity in short tons; ratio in percent

Measure	Source	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Inventories quantity	Australia	***	***	***	***	***
Ratio to imports	Australia	***	***	***	***	***
Ratio to U.S. shipments of imports	Australia	***	***	***	***	***
Ratio to total shipments of imports	Australia	***	***	***	***	***
Inventories quantity	Brazil	***	***	***	***	***
Ratio to imports	Brazil	***	***	***	***	***
Ratio to U.S. shipments of imports	Brazil	***	***	***	***	***
Ratio to total shipments of imports	Brazil	***	***	***	***	***
Inventories quantity	China	***	***	***	***	***
Ratio to imports	China	***	***	***	***	***
Ratio to U.S. shipments of imports	China	***	***	***	***	***
Ratio to total shipments of imports	China	***	***	***	***	***
Inventories quantity	Indonesia	***	***	***	***	***
Ratio to imports	Indonesia	***	***	***	***	***
Ratio to U.S. shipments of imports	Indonesia	***	***	***	***	***
Ratio to total shipments of imports	Indonesia	***	***	***	***	***
Inventories quantity	Portugal	***	***	***	***	***
Ratio to imports	Portugal	***	***	***	***	***
Ratio to U.S. shipments of imports	Portugal	***	***	***	***	***
Ratio to total shipments of imports	Portugal	***	***	***	***	***

Table continued.

Table IV-8
 Uncoated paper: U.S. importers' end-of-period inventories of imports, by source, by period

Quantity in short tons; ratio in percent

Measure	Source	2015	2016	2017
Inventories quantity	Australia	***	***	***
Ratio to imports	Australia	***	***	***
Ratio to U.S. shipments of imports	Australia	***	***	***
Ratio to total shipments of imports	Australia	***	***	***
Inventories quantity	Brazil	***	***	***
Ratio to imports	Brazil	***	***	***
Ratio to U.S. shipments of imports	Brazil	***	***	***
Ratio to total shipments of imports	Brazil	***	***	***
Inventories quantity	China	***	***	***
Ratio to imports	China	***	***	***
Ratio to U.S. shipments of imports	China	***	***	***
Ratio to total shipments of imports	China	***	***	***
Inventories quantity	Indonesia	***	***	***
Ratio to imports	Indonesia	***	***	***
Ratio to U.S. shipments of imports	Indonesia	***	***	***
Ratio to total shipments of imports	Indonesia	***	***	***
Inventories quantity	Portugal	***	***	***
Ratio to imports	Portugal	***	***	***
Ratio to U.S. shipments of imports	Portugal	***	***	***
Ratio to total shipments of imports	Portugal	***	***	***
Inventories quantity	Subject	***	***	***
Ratio to imports	Subject	***	***	***
Ratio to U.S. shipments of imports	Subject	***	***	***
Ratio to total shipments of imports	Subject	***	***	***
Inventories quantity	Nonsubject	***	***	***
Ratio to imports	Nonsubject	***	***	***
Ratio to U.S. shipments of imports	Nonsubject	***	***	***
Ratio to total shipments of imports	Nonsubject	***	***	***
Inventories quantity	All sources	***	***	***
Ratio to imports	All sources	***	***	***
Ratio to U.S. shipments of imports	All sources	***	***	***
Ratio to total shipments of imports	All sources	***	***	***

Table continued.

2015-2017 NO

The industry in Australia

Overview

During the final phase of the original investigations, the Commission received one foreign producer/exporter questionnaire, which accounted for all known production and exports of uncoated paper from Australia to the United States during 2014.

In these first full five-year reviews, the Commission issued and received a response to the foreign producer/exporter questionnaire from Paper Australia Pty LTD ("Paper Australia"), which was the only firm identified as possible producer or exporter of uncoated paper in Australia. By its estimate, Paper Australia accounted for approximately *** percent of uncoated paper production in Australia during 2020.

Table IV-9 presents information on the uncoated paper operations of the responding producer and exporter in Australia.

Table IV-9
Uncoated paper: Summary data for producers in Australia, 2020

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Paper Australia	***	***	***	***	***	***
All firms	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "--".

Changes in operations

As presented in table IV-10, the producer in Australia reported several operational and organizational changes since January 1, 2015.

Table IV-8 Continued
Uncoated paper: U.S. importers' end-of-period inventories of imports, by source, by period

Quantity in short tons; ratio in percent

Measure	Source	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Inventories quantity	Subject	***	***	***	***	***
Ratio to imports	Subject	***	***	***	***	***
Ratio to U.S. shipments of imports	Subject	***	***	***	***	***
Ratio to total shipments of imports	Subject	***	***	***	***	***
Inventories quantity	Nonsubject	***	***	***	***	***
Ratio to imports	Nonsubject	***	***	***	***	***
Ratio to U.S. shipments of imports	Nonsubject	***	***	***	***	***
Ratio to total shipments of imports	Nonsubject	***	***	***	***	***
Inventories quantity	All sources	***	***	***	***	***
Ratio to imports	All sources	***	***	***	***	***
Ratio to U.S. shipments of imports	All sources	***	***	***	***	***
Ratio to total shipments of imports	All sources	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

uncoated paper was *** percent lower in interim 2021 than interim 2020.²⁰ Sheeting capacity utilization decreased *** percentage points during 2015-20, with the largest decrease occurring from 2019 to 2020 (*** percentage points).²¹ ²² Sheeting capacity utilization was *** percentage points lower in interim 2021 than interim 2020.

End-of-period inventories decreased by *** percent during 2015-20.²³ End-of-period inventories were *** percent lower in interim 2021 than interim 2020. Home market shipments accounted for between *** percent of total shipments from 2015 to 2020.

Home market shipments, by quantity, increased *** percent from 2015-19, then decreased by *** percent from 2019-20, ending *** percent higher in 2020 than in 2015. It was *** percent lower in interim 2021 than in interim 2020. The value of home market shipments increased by *** percent from 2015 to 2018, and then decreased by *** percent from 2018 to 2020, ending *** percent lower in 2020 than in 2015. However, it was *** percent higher in interim 2021 than in interim 2020. The unit value of home market shipments decreased in each year from 2015-20.²⁴

²⁰ *** notes that ***. *** foreign producer questionnaire response, section II-3d.

²¹ This reflects the *** as referenced above.

²² Since the subject uncoated paper includes only cut paper, the capacity was collected based on the papercutting equipment rather than the papermaking capacity. However, this cutting capacity can only be used if the paper rolls are available to cut. As a result, papermaking capacity may be a bottleneck that limits uncoated paper production. Navigator states that paper machines are designed to always be the bottleneck while mills are designed to have excess sheeting capacity. Petitioners agree that papermaking equipment is very expensive and "cannot be turned on and off without incurring significant costs and risking damage to the equipment" thus there is a "huge" incentive "for producers to maximize their [paper making] capacity utilization." Hearing transcript, pp. 204-205 (Redondo); hearing transcript, p. 28 (Melton); and hearing transcript, p. 67 (Drake).

²³ The reason for this decrease in ending inventories was ***. Email from ***, September 28, 2021.

²⁴ *** reported that this decrease was because, ***

Table IV-10
Uncoated paper: Australia producers' reported changes in operations, since January 1, 2015

Item	Firm name and accompanying narrative response
Acquisitions	***
Revised labor agreements	***

Source: Compiled from data submitted in response to Commission questionnaires.

Operations on uncoated paper

Table IV-11 presents data on the uncoated paper operations of the responding producer in Australia for 2015-20, interim 2020, and interim 2021. Table IV-12 presents data on the responding Australian producer's export shipments by market. Paper Australia's sheeting capacity remained relatively steady, increasing by *** percent during 2015-20. It was *** percent lower in interim 2021 than in interim 2020.

Production increased by *** percent from 2015 to 2019, but then decreased by *** percent from 2019 to 2020, ending *** percent lower in 2020 than in 2015.¹⁹ Production of

¹⁹ *** attributes the decrease in production from 2019-2020 to ***. Email from ***, September 28, 2021.

Table IV-11
Uncoated Paper: Australian sheeting capacity, production, shipments, and inventories, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2015	2016	2017
Sheeting capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***

Table continued.

Table IV-11 Continued
Uncoated Paper: Australian sheeting capacity, production, shipments, and inventories, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Sheeting capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued.

Export shipments, by quantity, decreased *** percent from 2015-19, and then increased *** percent from 2019 to 2020, ending *** percent lower in 2020 than 2015.²⁵ It was *** percent lower in interim 2021 than in interim 2020. The value of export shipments decreased by *** percent from 2015-19, and then increased *** percent from 2019-20, ending *** percent lower in 2020 than in 2015. Export shipments, by value, were *** percent higher in interim 2021 than in interim 2020. Australian Paper reported ***.²⁶

***. Email from ***, September 28, 2021.

²⁵ A representative of Paper Australia testified that the increase in export shipments from 2019-20 was due to "orders that were taken prior to the pandemic, we fulfilled those orders. The overall capacity and production was reduced due to circumstances related to COVID, like everyone else. So they produced those orders also because of the opposition and the uncertainty, the acquisition of fiber assets of Aurora Packaging in Australia New Zealand by our parent company. We also were managing our cash flow. We had inventories we did not see demand for in the going forward period of 2020 because of COVID, and we chose to sell those as cash, that was all paid for product and sold to the Southeast Asia markets." Hearing transcript, p. 187 (Leith).

²⁶ ***. Email from ***, September 28, 2021.

Table IV-12

Uncoated paper: Producers' and exporters' in Australia exports, by destination market and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; ratio in percent

Destination market	Measure	2015	2016	2017
United States	Quantity	***	***	***
European Union	Quantity	***	***	***
Asia	Quantity	***	***	***
Middle East	Quantity	***	***	***
South/Central America	Quantity	***	***	***
All other markets	Quantity	***	***	***
All markets	Quantity	***	***	***
United States	Value	***	***	***
European Union	Value	***	***	***
Asia	Value	***	***	***
Middle East	Value	***	***	***
South/Central America	Value	***	***	***
All other markets	Value	***	***	***
All markets	Value	***	***	***
United States	Unit value	***	***	***
European Union	Unit value	***	***	***
Asia	Unit value	***	***	***
Middle East	Unit value	***	***	***
South/Central America	Unit value	***	***	***
All other markets	Unit value	***	***	***
All markets	Unit value	***	***	***
United States	Ratio	***	***	***
European Union	Ratio	***	***	***
Asia	Ratio	***	***	***
Middle East	Ratio	***	***	***
South/Central America	Ratio	***	***	***
All other markets	Ratio	***	***	***
All markets	Ratio	***	***	***

Table continued.

Table IV-11 Continued
Uncoated Paper: Australian sheeting capacity, production, shipments, and inventories, by period

Unit value in dollars per short ton; ratio and share in percent

Item	Measure	2015	2016	2017
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Sheeting capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Export shipments	Share	***	***	***
Total shipments	Share	***	***	***

Table continued.

Table IV-11 Continued
Uncoated Paper: Australian sheeting capacity, production, shipments, and inventories, by period

Unit value in dollars per short ton; ratio and share in percent

Item	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Sheeting capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export shipments	Share	***	***	***	***	***
Total shipments	Share	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeros, null values, and undefined calculations are suppressed and shown as "—".

Alternative products

Paper Australia did not report production of other products on the same machinery used to produce uncoated paper.²⁷

Exports

Table IV-13 presents data for uncoated paper and paperboard from Australia in descending order of quantity for 2020. During 2020, New Zealand was the top export market for uncoated paper from Australia, by quantity, accounting for 38.2 percent, followed by Germany, accounting for 9.6 percent. The United States accounted for less than 0.3 percent of exports from Australia in 2020, by quantity.

²⁷ Paper Australia stated ***. *** foreign producer questionnaire response, section II-3e.

Table IV-12 Continued
 Uncoated paper: Producers' and exporters' in Australia exports, by destination market and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; ratio in percent

Destination market	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
United States	Quantity	***	***	***	***	***
European Union	Quantity	***	***	***	***	***
Asia	Quantity	***	***	***	***	***
Middle East	Quantity	***	***	***	***	***
South/Central America	Quantity	***	***	***	***	***
All other markets	Quantity	***	***	***	***	***
All markets	Quantity	***	***	***	***	***
United States	Value	***	***	***	***	***
European Union	Value	***	***	***	***	***
Asia	Value	***	***	***	***	***
Middle East	Value	***	***	***	***	***
South/Central America	Value	***	***	***	***	***
All other markets	Value	***	***	***	***	***
All markets	Value	***	***	***	***	***
United States	Unit value	***	***	***	***	***
European Union	Unit value	***	***	***	***	***
Asia	Unit value	***	***	***	***	***
Middle East	Unit value	***	***	***	***	***
South/Central America	Unit value	***	***	***	***	***
All other markets	Unit value	***	***	***	***	***
All markets	Unit value	***	***	***	***	***
United States	Ratio	***	***	***	***	***
European Union	Ratio	***	***	***	***	***
Asia	Ratio	***	***	***	***	***
Middle East	Ratio	***	***	***	***	***
South/Central America	Ratio	***	***	***	***	***
All other markets	Ratio	***	***	***	***	***
All markets	Ratio	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Ratios represent the ratio of exports to production.

Table IV-13 Continued

Uncoated paper and paperboard: Exports from Australia, by destination market and by year

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2018	2019	2020
United States	Quantity	---	482	105
New Zealand	Quantity	20,485	15,015	15,211
Germany	Quantity	1,570	545	3,833
Chile	Quantity	---	688	3,233
Mexico	Quantity	---	---	2,262
Hong Kong	Quantity	811	755	1,773
Pakistan	Quantity	---	---	1,727
Papua New Guinea	Quantity	1,375	1,238	1,346
Lithuania	Quantity	---	52	1,071
All other destination markets	Quantity	3,197	2,983	9,268
All destination markets	Quantity	27,438	21,756	39,829
United States	Value	5	393	72
New Zealand	Value	16,330	12,053	11,272
Germany	Value	1,266	382	2,208
Chile	Value	---	449	1,965
Mexico	Value	---	---	1,049
Hong Kong	Value	686	669	1,206
Pakistan	Value	---	---	965
Papua New Guinea	Value	1,367	1,270	1,338
Lithuania	Value	---	38	588
All other destination markets	Value	3,504	2,533	5,783
All destination markets	Value	23,158	17,787	26,447

Table continued.

Table IV-13
Uncoated paper and paperboard: Exports from Australia, by destination market and by year

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2015	2016	2017
United States	Quantity	44,128	2	1
New Zealand	Quantity	12,110	20,129	17,752
Germany	Quantity	11,601	14,533	9,386
Chile	Quantity	1,629	8,317	2,726
Mexico	Quantity	44	22	---
Hong Kong	Quantity	482	430	583
Pakistan	Quantity	---	---	---
Papua New Guinea	Quantity	1,564	1,553	1,116
Lithuania	Quantity	606	886	126
All other destination markets	Quantity	12,613	17,060	7,579
All destination markets	Quantity	84,776	62,933	39,269
United States	Value	32,473	12	2
New Zealand	Value	9,395	15,423	14,040
Germany	Value	6,927	8,805	5,828
Chile	Value	1,100	5,414	1,786
Mexico	Value	29	13	---
Hong Kong	Value	504	317	474
Pakistan	Value	---	---	---
Papua New Guinea	Value	1,600	1,565	1,127
Lithuania	Value	345	523	86
All other destination markets	Value	8,284	10,553	4,755
All destination markets	Value	60,656	42,626	28,098

Table continued.

Table IV-13 Continued

Uncoated paper and paperboard: Exports from Australia, by destination market and by year

Unit value in dollars per short ton; share in percent

Destination market	Measure	2018	2019	2020
United States	Unit value	---	815	689
New Zealand	Unit value	797	803	741
Germany	Unit value	807	701	576
Chile	Unit value	---	653	608
Mexico	Unit value	---	---	464
Hong Kong	Unit value	846	885	681
Pakistan	Unit value	---	---	559
Papua New Guinea	Unit value	995	1,026	994
Lithuania	Unit value	---	726	549
All other destination markets	Unit value	1,096	849	624
All destination markets	Unit value	844	818	664
United States	Share of quantity	---	2.2	0.3
New Zealand	Share of quantity	74.7	69.0	38.2
Germany	Share of quantity	5.7	2.5	9.6
Chile	Share of quantity	---	3.2	8.1
Mexico	Share of quantity	---	---	5.7
Hong Kong	Share of quantity	3.0	3.5	4.5
Pakistan	Share of quantity	---	---	4.3
Papua New Guinea	Share of quantity	5.0	5.7	3.4
Lithuania	Share of quantity	---	0.2	2.7
All other destination markets	Share of quantity	11.7	13.7	23.3
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 4802.56 and 4802.57 reported by the Australian Bureau of Statistics in the Global Trade Atlas database, accessed September 15, 2021.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top, all remaining top export destinations shown in descending order of 2020 data. HS subheadings 4802.56 and 4802.57 are basket categories that contain products outside the scope of these reviews.

Table IV-13 Continued
 Uncoated paper and paperboard: Exports from Australia, by destination market and by year

Unit value in dollars per short ton; share in percent

Destination market	Measure	2015	2016	2017
United States	Unit value	736	5,530	2,177
New Zealand	Unit value	776	766	791
Germany	Unit value	597	606	621
Chile	Unit value	675	651	655
Mexico	Unit value	653	606	---
Hong Kong	Unit value	1,045	738	813
Pakistan	Unit value	---	---	---
Papua New Guinea	Unit value	1,023	1,008	1,010
Lithuania	Unit value	569	590	680
All other destination markets	Unit value	657	619	627
All destination markets	Unit value	715	677	716
United States	Share of quantity	52.1	0.0	0.0
New Zealand	Share of quantity	14.3	32.0	45.2
Germany	Share of quantity	13.7	23.1	23.9
Chile	Share of quantity	1.9	13.2	6.9
Mexico	Share of quantity	0.1	0.0	---
Hong Kong	Share of quantity	0.6	0.7	1.5
Pakistan	Share of quantity	---	---	---
Papua New Guinea	Share of quantity	1.8	2.5	2.8
Lithuania	Share of quantity	0.7	1.4	0.3
All other destination markets	Share of quantity	14.9	27.1	19.3
All destination markets	Share of quantity	100.0	100.0	100.0

Table continued.

The industry in Brazil

Overview

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from two firms, Suzano and International Paper Brazil, that accounted for *** percent of production of uncoated paper in Brazil and *** percent of U.S. imports of uncoated paper from Brazil during 2014. In these first full five-year reviews, the Commission issued foreign producer/exporter questionnaires to two firms identified as possible producers of uncoated paper in Brazil. The Commission received a usable questionnaire response from: Suzano S.A. ("Suzano") and Sylvamo Do Brazil Ltda. And Sylvamo Exports Ltda. ("Sylvamo"). By their estimates, the Brazilian foreign producers accounted for approximately *** percent of uncoated paper production in Brazil and responding U.S. importers' U.S. imports of uncoated paper from Brazil during 2020.

Table IV-14 presents information on the uncoated paper operations of the responding producers in Brazil.

Table IV-14
Uncoated paper: Summary data for producers in Brazil, 2020

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Suzano	***	***	***	***	***	***
Sylvamo	***	***	***	***	***	***
All firms	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Changes in operations

As presented in table IV-15 producers in Brazil reported several operational and organizational changes since January 1, 2015.

Table IV-15
Uncoated paper: Brazilian producers' reported changes in operations, since January 1, 2015

Item	Firm name and accompanying narrative response
Plant openings	***.
Expansions	***
Contractions or re-purposing	***.
Prolonged shutdowns or curtailments	***.
Prolonged shutdowns or curtailments	***.
Revised labor agreements	***.

Source: Compiled from data submitted in response to Commission questionnaires.

Operations on uncoated paper

Table IV-16 presents data on the uncoated paper operations of the responding producers in Brazil for 2015-20, interim 2020, and interim 2021. Table IV-17 presents data on the responding Brazilian producers' export shipments by market. Sheeting capacity in Brazil decreased by *** percent during 2015-20. Brazil saw the largest decrease in sheeting capacity of *** percent between 2017 and 2018, which was driven by ***.²⁸ Sheeting capacity then increased *** percent from 2018-20. Sheeting capacity was *** percent lower in interim 2021 than in interim 2020.

Production in Brazil decreased in each year during 2015-20, ending *** percent lower in 2020 than in 2015. The majority of the decrease occurred from 2019 to 2020, with ***. Production was *** percent higher in interim 2021 than in interim 2020.²⁹ Sheeting capacity utilization in Brazil fluctuated during 2015-20. After a *** percentage point increase from 2015 to 2018,

²⁸ *** attributed the decline as a result of ***. Email from ***, September 28, 2021. ***, *** foreign producer questionnaire response, section II-11.

²⁹ ***. Email from ***, September 30, 2021.

2021-10-20
 PAGE 10

sheeting capacity utilization decreased by *** percentage points from 2018 to 2020, ending *** percentage points lower in 2020 than in 2015. Sheeting capacity utilization was *** percentage points higher in interim 2021 than interim 2020.³⁰

End-of-period inventories irregularly increased by *** percent from 2015 to 2020. However, end-of-period inventories were *** percent lower in interim 2021 than interim 2020.

Home market shipments accounted for between *** percent of total shipments from 2015 to 2020. Home market shipments, by quantity, decreased in each year during 2015-20, except from 2015 to 2016, ending *** percent lower in 2020 than in 2015. The majority of the decrease occurred from 2019 to 2020, when home market shipments decreased by *** percent.³¹ It was *** percent higher in interim 2021 than interim 2020. The value of home market shipments increased *** percent from 2015-17, then decreased *** percent from 2017-20, ending *** percent lower in 2020 than in 2015. However, it was *** percent higher in interim 2021 than in interim 2020. The unit value of home market shipments increased *** percent from 2015 to 2017, before decreasing *** percent from 2017 to 2020, ending *** percent lower in 2020 than in 2015.

Export shipments, by quantity, decreased by *** percent between 2015-20, decreasing in each period, except for 2017-18, and accounted for between *** percent of total shipments during 2015-20. However, export shipments were *** percent higher in interim 2021 than interim 2020.³² The value of export shipments decreased *** percent from 2015 to 2020, declining in each period, except 2017-18. It was *** percent higher in interim 2021 than in interim 2020. The average unit value of export shipments decreased from 2015-17, then increased from 2017-18 before declining *** percent from 2019 to 2020.³³ From 2015 through interim 2021, Brazilian producers primarily exported to ***.

³⁰ ***. Email from ***, September 30, 2021.

³¹ ***. Email from ***, September 28, 2021.

³² *** reports that the increase in quantity exports ***. Email from ***, September 28, 2021.

³³ ***. Email from ***, September 30, 2021.

Table IV-16

Uncoated paper: Brazilian sheeting capacity, production, shipments, and inventories, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2015	2016	2017
Sheeting capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***

Table continued.

Table IV-16 Continued

Uncoated paper: Brazilian sheeting capacity, production, shipments, and inventories, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Sheeting capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued.

Table IV-16 Continued

Uncoated paper: Brazilian sheeting capacity, production, shipments, and inventories, by period

Unit value in dollars per short ton; ratio and share in percent

Item	Measure	2015	2016	2017
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Sheeting capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Export shipments	Share	***	***	***
Total shipments	Share	***	***	***

Table continued.

Table IV-16 Continued

Uncoated paper: Brazilian sheeting capacity, production, shipments, and inventories, by period

Unit value in dollars per short ton; ratio and share in percent

Item	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Sheeting capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export shipments	Share	***	***	***	***	***
Total shipments	Share	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeros, null values, and undefined calculations are suppressed and shown as "---".

Table IV-17

Uncoated paper: Producers' and exporters' in Brazil exports, by destination market and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; ratio in percent

Destination market	Measure	2015	2016	2017
United States	Quantity	***	***	***
European Union	Quantity	***	***	***
Asia	Quantity	***	***	***
Middle East	Quantity	***	***	***
South/Central America	Quantity	***	***	***
All other markets	Quantity	***	***	***
All markets	Quantity	***	***	***
United States	Value	***	***	***
European Union	Value	***	***	***
Asia	Value	***	***	***
Middle East	Value	***	***	***
South/Central America	Value	***	***	***
All other markets	Value	***	***	***
All markets	Value	***	***	***
United States	Unit value	***	***	***
European Union	Unit value	***	***	***
Asia	Unit value	***	***	***
Middle East	Unit value	***	***	***
South/Central America	Unit value	***	***	***
All other markets	Unit value	***	***	***
All markets	Unit value	***	***	***
United States	Ratio	***	***	***
European Union	Ratio	***	***	***
Asia	Ratio	***	***	***
Middle East	Ratio	***	***	***
South/Central America	Ratio	***	***	***
All other markets	Ratio	***	***	***
All markets	Ratio	***	***	***

Table continued.

20 3/2017

Table IV-17 Continued

Uncoated paper: Producers' and exporters' in Brazil exports, by destination market and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; ratio in percent

Destination market	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
United States	Quantity	***	***	***	***	***
European Union	Quantity	***	***	***	***	***
Asia	Quantity	***	***	***	***	***
Middle East	Quantity	***	***	***	***	***
South/Central America	Quantity	***	***	***	***	***
All other markets	Quantity	***	***	***	***	***
All markets	Quantity	***	***	***	***	***
United States	Value	***	***	***	***	***
European Union	Value	***	***	***	***	***
Asia	Value	***	***	***	***	***
Middle East	Value	***	***	***	***	***
South/Central America	Value	***	***	***	***	***
All other markets	Value	***	***	***	***	***
All markets	Value	***	***	***	***	***
United States	Unit value	***	***	***	***	***
European Union	Unit value	***	***	***	***	***
Asia	Unit value	***	***	***	***	***
Middle East	Unit value	***	***	***	***	***
South/Central America	Unit value	***	***	***	***	***
All other markets	Unit value	***	***	***	***	***
All markets	Unit value	***	***	***	***	***
United States	Ratio	***	***	***	***	***
European Union	Ratio	***	***	***	***	***
Asia	Ratio	***	***	***	***	***
Middle East	Ratio	***	***	***	***	***
South/Central America	Ratio	***	***	***	***	***
All other markets	Ratio	***	***	***	***	***
All markets	Ratio	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Ratios represent the ratio of exports to production.

Alternative products

As shown in table IV-18, responding Brazilian firms produced other products on the same equipment and machinery used to produce uncoated paper.

Table IV-18

Uncoated paper: Brazilian producers' overall sheeting capacity and production on the same equipment as subject production, by period

Quantity in short tons; share and ratio in percent

Item	Measure	2015	2016	2017
Overall sheeting capacity	Quantity	***	***	***
Production: Uncoated paper	Quantity	***	***	***
Production: Sheets over 150 gsm	Quantity	***	***	***
Production: Coated paper	Quantity	***	***	***
Production: Other products	Quantity	***	***	***
Production: Out-of-scope products	Quantity	***	***	***
Production: All products on same machinery	Quantity	***	***	***
Overall sheeting capacity utilization	Ratio	***	***	***
Production: Uncoated paper	Share	***	***	***
Production: Sheets over 150 gsm	Share	***	***	***
Production: Coated paper	Share	***	***	***
Production: Other products	Share	***	***	***
Production: Out-of-scope products	Share	***	***	***
Production: All products on same machinery	Share	***	***	***

Table continued.

Table IV-18 Continued

Uncoated paper: Brazilian producers' overall sheeting capacity and production on the same equipment as subject production, by period

Quantity in short tons; share and ratio in percent

Item	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Overall sheeting capacity	Quantity	***	***	***	***	***
Production: Uncoated paper	Quantity	***	***	***	***	***
Production: Sheets over 150 gsm	Quantity	***	***	***	***	***
Production: Coated paper	Quantity	***	***	***	***	***
Production: Other products	Quantity	***	***	***	***	***
Production: Out-of-scope products	Quantity	***	***	***	***	***
Production: All products on same machinery	Quantity	***	***	***	***	***
Overall sheeting capacity utilization	Ratio	***	***	***	***	***
Production: Uncoated paper	Share	***	***	***	***	***
Production: Sheets over 150 gsm	Share	***	***	***	***	***
Production: Coated paper	Share	***	***	***	***	***
Production: Other products	Share	***	***	***	***	***
Production: Out-of-scope products	Share	***	***	***	***	***
Production: All products on same machinery	Share	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Exports

Table IV-19 presents data for exports of uncoated paper and paperboard from Brazil in descending order of quantity for 2020. During 2020, the United States was the top export market for uncoated paper and paperboard from Brazil, accounting for 13.0 percent, followed by the United Kingdom, accounting for 9.5 percent.

Table IV-19
Uncoated paper and paperboard: Exports from Brazil, by period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2015	2016	2017
United States	Quantity	155,518	110,777	53,599
United Kingdom	Quantity	115,673	102,592	88,725
Peru	Quantity	42,918	46,301	45,886
Chile	Quantity	70,060	62,491	62,588
Cayman Islands	Quantity	11,270	69,016	109,874
Argentina	Quantity	24,649	24,445	26,632
China	Quantity	7,857	6,468	14,134
Egypt	Quantity	7,346	6,800	2,608
France	Quantity	10,779	8,547	7,756
All other destination markets	Quantity	287,846	245,251	255,103
All destination markets	Quantity	733,917	682,688	666,904
United States	Value	126,221	78,442	36,462
United Kingdom	Value	84,666	62,695	48,840
Peru	Value	36,638	33,553	33,199
Chile	Value	61,071	51,382	52,832
Cayman Islands	Value	9,146	46,582	73,067
Argentina	Value	39,813	28,633	26,808
China	Value	5,629	4,537	8,913
Egypt	Value	5,087	4,407	1,764
France	Value	6,771	4,949	4,404
All other destination markets	Value	214,612	167,698	173,816
All destination markets	Value	589,655	482,877	460,104

Table continued.

Table IV-19 Continued
Uncoated paper and paperboard: Exports from Brazil, by period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2018	2019	2020
United States	Quantity	59,034	103,263	71,620
United Kingdom	Quantity	80,373	75,563	52,253
Peru	Quantity	81,438	73,499	47,014
Chile	Quantity	78,319	66,926	41,322
Cayman Islands	Quantity	53,005	13,394	31,738
Argentina	Quantity	17,381	20,688	21,262
China	Quantity	19,145	16,075	17,182
Egypt	Quantity	1,820	9,008	15,203
France	Quantity	12,286	15,719	14,965
All other destination markets	Quantity	250,747	274,154	237,905
All destination markets	Quantity	653,547	668,290	550,464
United States	Value	46,406	82,996	47,641
United Kingdom	Value	52,953	50,916	32,268
Peru	Value	62,562	54,487	29,969
Chile	Value	66,601	55,143	32,491
Cayman Islands	Value	36,526	8,930	20,172
Argentina	Value	17,955	17,492	20,736
China	Value	12,267	10,680	9,655
Egypt	Value	1,327	5,563	8,321
France	Value	7,426	9,380	7,893
All other destination markets	Value	194,594	191,449	138,344
All destination markets	Value	498,616	487,037	347,491

Table continued.

Table IV-19 Continued
Uncoated paper and paperboard: Exports from Brazil, by period

Unit value in dollars per short ton; share in percent

Destination market	Measure	2015	2016	2017
United States	Unit value	812	708	680
United Kingdom	Unit value	732	611	550
Peru	Unit value	854	725	724
Chile	Unit value	872	822	844
Cayman Islands	Unit value	812	675	665
Argentina	Unit value	1,615	1,171	1,007
China	Unit value	716	701	631
Egypt	Unit value	693	648	676
France	Unit value	628	579	568
All other destination markets	Unit value	746	684	681
All destination markets	Unit value	803	707	690
United States	Share of quantity	21.2	16.2	8.0
United Kingdom	Share of quantity	15.8	15.0	13.3
Peru	Share of quantity	5.8	6.8	6.9
Chile	Share of quantity	9.5	9.2	9.4
Cayman Islands	Share of quantity	1.5	10.1	16.5
Argentina	Share of quantity	3.4	3.6	4.0
China	Share of quantity	1.1	0.9	2.1
Egypt	Share of quantity	1.0	1.0	0.4
France	Share of quantity	1.5	1.3	1.2
All other destination markets	Share of quantity	39.2	35.9	38.3
All destination markets	Share of quantity	100.0	100.0	100.0

Table continued.

PA 21 40

Table IV-19 Continued
Uncoated paper and paperboard: Exports from Brazil, by period

Unit value in dollars per short ton; share in percent

Destination market	Measure	2018	2019	2020
United States	Unit value	786	804	665
United Kingdom	Unit value	659	674	618
Peru	Unit value	768	741	637
Chile	Unit value	850	824	786
Cayman Islands	Unit value	689	667	636
Argentina	Unit value	1,033	845	975
China	Unit value	641	664	562
Egypt	Unit value	729	618	547
France	Unit value	604	597	527
All other destination markets	Unit value	776	698	582
All destination markets	Unit value	763	729	631
United States	Share of quantity	9.0	15.5	13.0
United Kingdom	Share of quantity	12.3	11.3	9.5
Peru	Share of quantity	12.5	11.0	8.5
Chile	Share of quantity	12.0	10.0	7.5
Cayman Islands	Share of quantity	8.1	2.0	5.8
Argentina	Share of quantity	2.7	3.1	3.9
China	Share of quantity	2.9	2.4	3.1
Egypt	Share of quantity	0.3	1.3	2.8
France	Share of quantity	1.9	2.4	2.7
All other destination markets	Share of quantity	38.4	41.0	43.2
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 4802.56 and 4802.57 reported by SECEX – Foreign Trade Secretariat in the Global Trade Atlas database, accessed September 15, 2021.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeros, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top, all remaining top export destinations shown in descending order of 2020 data. HS subheadings 4802.56 and 4802.57 are basket categories that contain products outside the scope of these reviews.

The industry in China

Overview

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from two firms, which accounted for approximately *** percent of production of uncoated paper in China during 2014, and approximately *** percent of uncoated paper exports from China to the United States during 2014.³⁴ In these first full five-year reviews, the Commission issued foreign producer/exporter questionnaires to ten firms identified as possible producers or exporters of uncoated paper in China. The Commission did not receive a response from any Chinese producers or exporters.

China is the largest manufacturer of paper and paperboard in the world, having surpassed the United States in 2008.³⁵ The major companies in the paper and paperboard manufacturing industry in China include Sinar Mas Group Co., Ltd. (which holds the largest market share in the Chinese industry at 6.2 percent), Shandong Chenming Paper Holdings Co., Ltd., Anhui Shanying Paper Industry Co. Ltd., Shandong Sun Paper Industry Joint Stock Co., and Shandong Huatai Paper Group Co., Ltd.³⁶ Revenue for the Chinese paper and paperboard manufacturing industry reportedly declined by 2.3 percent in 2020, due to the COVID-19 pandemic (which caused weaker domestic and international demand).³⁷ An industry analyst forecasts that the Chinese paper and paperboard industry revenue will increase annually by 4.0 percent to \$213.4 billion in 2025, due to anticipated steady growth in domestic demand from manufacturers, offices, and households.³⁸

Newsprint, writing paper, and other paper, which includes uncoated paper as well as paper outside the scope of this investigation, make up the second-largest product segment, accounting for 23.2 percent of the Chinese paper industry's production in 2020.³⁹ ***.⁴⁰

³⁴ Original confidential report, p. VII-24.

³⁵ IBIS World, "Paper and Paperboard Manufacturing in China," p. 11, December 2020.

³⁶ IBIS World, "Paper and Paperboard Manufacturing in China," pp. 5, 8, December 2020.

³⁷ IBIS World, "Paper and Paperboard Manufacturing in China," p. 3, 9 December 2020.

³⁸ IBIS World, "Paper and Paperboard Manufacturing in China," p. 9, December 2020.

³⁹ IBIS World, "Paper and Paperboard Manufacturing in China," p. 16, December 2020.

⁴⁰ Domestic posthearing brief, exhibit 27. ***.

Exports

Table IV-20 presents data for exports of uncoated paper and paperboard from China in descending order of quantity for 2020. During 2020, the United States was among the smallest export markets for uncoated paper from China, accounting for 0.3 percent of China's exports. Japan was the top export market for uncoated paper from China in 2020, by quantity, accounting for 34.6 percent, followed by Hong Kong, which accounted for 10.3 percent.

Table IV-20
Uncoated paper and paperboard: Exports from China, by period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2015	2016	2017
United States	Quantity	35,949	379	1,127
Japan	Quantity	194,075	189,805	233,488
Hong Kong	Quantity	84,738	83,891	72,202
Korea, South	Quantity	84,542	108,063	115,521
Philippines	Quantity	14,148	24,826	24,715
Australia	Quantity	76,934	41,196	10,535
Malaysia	Quantity	20,109	47,163	40,002
Thailand	Quantity	16,977	15,045	15,789
Singapore	Quantity	29,446	28,657	31,064
All other destination markets	Quantity	254,390	342,652	237,962
All destination markets	Quantity	811,307	881,677	782,405
United States	Value	28,238	492	917
Japan	Value	138,389	151,931	173,144
Hong Kong	Value	63,837	60,680	51,559
Korea, South	Value	62,081	77,385	79,651
Philippines	Value	11,151	17,820	17,253
Australia	Value	60,010	30,798	7,483
Malaysia	Value	14,968	31,280	27,174
Thailand	Value	12,714	10,307	11,001
Singapore	Value	23,041	21,378	21,909
All other destination markets	Value	204,349	243,689	175,358
All destination markets	Value	618,778	645,758	565,447

Table continued.

Table IV-20 Continued
Uncoated paper and paperboard: Exports from China, by period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2018	2019	2020
United States	Quantity	950	1,150	1,386
Japan	Quantity	211,434	187,704	168,006
Hong Kong	Quantity	66,075	67,039	50,093
Korea, South	Quantity	71,243	45,675	38,170
Philippines	Quantity	17,893	22,897	33,074
Australia	Quantity	9,383	16,129	30,986
Malaysia	Quantity	29,647	26,746	20,706
Thailand	Quantity	11,301	13,916	13,404
Singapore	Quantity	33,129	23,564	13,352
All other destination markets	Quantity	164,999	264,220	116,407
All destination markets	Quantity	616,054	669,040	485,584
United States	Value	1,168	1,218	1,072
Japan	Value	161,787	148,702	132,265
Hong Kong	Value	51,410	53,727	35,602
Korea, South	Value	53,176	35,242	27,332
Philippines	Value	14,117	18,123	24,043
Australia	Value	7,372	12,770	23,674
Malaysia	Value	23,392	21,196	15,857
Thailand	Value	8,872	10,111	9,408
Singapore	Value	25,836	20,485	12,903
All other destination markets	Value	137,155	203,479	91,448
All destination markets	Value	484,286	525,054	373,602

Table continued.

Table IV-20 Continued
Uncoated paper and paperboard: Exports from China, by period

Unit value in dollars per short ton; share in percent

Destination market	Measure	2015	2016	2017
United States	Unit value	786	1,298	814
Japan	Unit value	713	800	742
Hong Kong	Unit value	753	723	714
Korea, South	Unit value	734	716	689
Philippines	Unit value	788	718	698
Australia	Unit value	780	748	710
Malaysia	Unit value	744	663	679
Thailand	Unit value	749	685	697
Singapore	Unit value	782	746	705
All other destination markets	Unit value	803	711	737
All destination markets	Unit value	763	732	723
United States	Share of quantity	4.4	0.0	0.1
Japan	Share of quantity	23.9	21.5	29.8
Hong Kong	Share of quantity	10.4	9.5	9.2
Korea, South	Share of quantity	10.4	12.3	14.8
Philippines	Share of quantity	1.7	2.8	3.2
Australia	Share of quantity	9.5	4.7	1.3
Malaysia	Share of quantity	2.5	5.3	5.1
Thailand	Share of quantity	2.1	1.7	2.0
Singapore	Share of quantity	3.6	3.3	4.0
All other destination markets	Share of quantity	31.4	38.9	30.4
All destination markets	Share of quantity	100.0	100.0	100.0

Table continued.

Table IV-20 Continued
Uncoated paper and paperboard: Exports from China, by period

Unit value in dollars per short ton; share in percent

Destination market	Measure	2018	2019	2020
United States	Unit value	1,229	1,060	773
Japan	Unit value	765	792	787
Hong Kong	Unit value	778	801	711
Korea, South	Unit value	746	772	716
Philippines	Unit value	789	791	727
Australia	Unit value	786	792	764
Malaysia	Unit value	789	792	766
Thailand	Unit value	785	727	702
Singapore	Unit value	780	869	966
All other destination markets	Unit value	831	770	786
All destination markets	Unit value	786	785	769
United States	Share of quantity	0.2	0.2	0.3
Japan	Share of quantity	34.3	28.1	34.6
Hong Kong	Share of quantity	10.7	10.0	10.3
Korea, South	Share of quantity	11.6	6.8	7.9
Philippines	Share of quantity	2.9	3.4	6.8
Australia	Share of quantity	1.5	2.4	6.4
Malaysia	Share of quantity	4.8	4.0	4.3
Thailand	Share of quantity	1.8	2.1	2.8
Singapore	Share of quantity	5.4	3.5	2.7
All other destination markets	Share of quantity	26.8	39.5	24.0
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 4802.56 and 4802.57 reported by SECEX – Foreign Trade Secretariat in the Global Trade Atlas database, accessed September 15, 2021.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top, all remaining top export destinations shown in descending order of 2020 data. HS subheadings 4802.56 and 4802.57 are basket categories that contain products outside the scope of these reviews.

The industry in Indonesia

Overview

During the final phase of the original investigations, the Commission received a foreign producer/exporter questionnaire from one firm which accounted for *** percent of production of uncoated paper in Indonesia during 2014, and approximately *** percent of uncoated paper exports from Indonesia to the United States during 2014. In these first full five-year reviews, the Commission issued foreign producer/exporter questionnaires to four firms identified as possible producers or exporters of uncoated paper in Indonesia. The Commission received a usable questionnaire response from three producers: PT. Pabrik Kertas Tjiwi Kimia Tbk, PT. Pindo Deli Pulp and Paper Mills, and PT. Indah Kiat Pulp and Paper Tbk. ("APP Group"). By its estimate, APP Group accounted for approximately *** percent of uncoated paper production in Indonesia during 2020.⁴¹

Table IV-21 presents information on the uncoated paper operations of the responding producer in Indonesia.

Table IV-21
Uncoated paper: Summary data for producers in Indonesia, 2020

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
APP Group	***	***	***	***	***	***
All firms	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Changes in operations

As presented in table IV-22, the producer in Indonesia reported several operational and organizational changes since January 1, 2015.

⁴¹ APP Group ***.

Table IV-22

Uncoated paper: Indonesian producers' reported changes in operations, since January 1, 2015

Item	Firm name and accompanying narrative response
Plant closings	***

Source: Compiled from data submitted in response to Commission questionnaires.

Operations on uncoated paper

Table IV-23 presents data on the uncoated paper operations of the responding producers in Indonesia for 2015-20, interim 2020, and interim 2021. Table IV-24 presents data on the responding Indonesian producers' export shipments by market. Sheeting capacity in Indonesia increased by *** percent during 2015-17, but then decreased by *** percent from 2017 to 2020, ending *** percent lower in 2020 than in 2015.⁴² Sheeting capacity was *** percent lower in interim 2021 than interim 2020. Production remained relatively steady, fluctuating over the period, ending *** percent lower in 2020 than 2015.⁴³

Production in Indonesia was *** percent lower in interim 2021 than in interim 2020. Despite a *** percentage point decrease from 2019 to 2020, sheeting capacity utilization in Indonesia increased overall by *** percentage points during 2015-20.⁴⁴ Sheeting capacity utilization was *** percentage points higher in interim 2021 than interim 2020.

End-of-period inventories fluctuated over the period, increasing by *** percent from 2015 to 2018, decreasing by *** percent from 2018 to 2019, and increasing by *** percent

⁴² The decrease in APP Group's sheeting capacity reflects the group's shift towards packaging material production in response to growing demand driven by delivery services such as Amazon. Hearing transcript, p. 143 (Gupta); ***. Email from ***, September 28, 2021. *** foreign producer questionnaire response, section II-2a.

⁴³ ***. Email from ***, September 28, 2021.

⁴⁴ Sheeting capacity *** during the period. ***. Email from ***, September 28, 2021.

between 2019 and 2020, ending *** percent higher in 2020 than in 2015.⁴⁵ End-of-period inventories were *** percent lower in interim 2021 than interim 2020.

Home market shipments, by quantity, fluctuated during 2015-20, with the largest decrease *** between 2019 and 2020, ending the period *** percent lower in 2020 than 2015. It was *** percent higher in interim 2021 than in interim 2020. The value of home market shipments increased *** percent from 2015-19, and then decreased *** percent from 2019 to 2020, ending *** percent lower in 2020 than in 2015. It was *** percent higher in interim 2021 than in interim 2020. The unit value of home market shipments saw the largest increase (***) percent) between 2017 and 2018, before decreasing *** percent from 2019 to 2020.⁴⁶

Export shipments accounted for between *** percent of total shipments in Indonesia from 2015-20. Export shipments, by quantity, fluctuated over the period, ending *** percent higher in 2020 than in 2015. They were *** percent higher in interim 2021 than in interim 2020. The value of export shipments decreased *** percent between 2015 and 2016 before increasing *** percent from 2016 to 2019, and then decreased *** percent from 2019 to 2020, ending *** percent lower in 2020 than in 2015. Export shipments, by value, were *** percent higher in interim 2021 than in interim 2020. The unit value of export shipments fluctuated during 2015-20, with the largest increase of *** percent from 2017 to 2018, before declining *** percent from 2019 to 2020. APP Group reported it ***. *** represents the largest export market from 2015 to interim 2021.⁴⁷

⁴⁵ *** reported that *** Email from ***, September 28, 2021.

⁴⁶ *** denotes that the ***. Email from ***, September 28, 2021.

⁴⁷ APP Group's main export markets are Indonesia, China, Japan, and Malaysia. Hearing transcript p. 145 (Gupta).

Table IV-23

Uncoated paper: Indonesian sheeting capacity, production, shipments, and inventories, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2015	2016	2017
Sheeting capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***

Table continued.

Table IV-23 Continued

Uncoated paper: Indonesian sheeting capacity, production, shipments, and inventories, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Sheeting capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued.

Table IV-23 Continued

Uncoated paper: Indonesian sheeting capacity, production, shipments, and inventories, by period

Unit value in dollars per short ton; share and ratio in percent

Item	Measure	2015	2016	2017
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Sheeting capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Export shipments	Share	***	***	***
Total shipments	Share	***	***	***

Table continued.

PAGE 110

Table IV-23 Continued

Uncoated paper: Indonesian sheeting capacity, production, shipments, and inventories, by period

Unit value in dollars per short ton; share and ratio in percent

Item	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Sheeting capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export shipments	Share	***	***	***	***	***
Total shipments	Share	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table IV-24
Uncoated paper: Producers' and exporters' in Indonesia exports, by destination market and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; ratio in percent

Destination market	Measure	2015	2016	2017
United States	Quantity	***	***	***
European Union	Quantity	***	***	***
Asia	Quantity	***	***	***
Middle East	Quantity	***	***	***
South/Central America	Quantity	***	***	***
All other markets	Quantity	***	***	***
All markets	Quantity	***	***	***
United States	Value	***	***	***
European Union	Value	***	***	***
Asia	Value	***	***	***
Middle East	Value	***	***	***
South/Central America	Value	***	***	***
All other markets	Value	***	***	***
All markets	Value	***	***	***
United States	Unit value	***	***	***
European Union	Unit value	***	***	***
Asia	Unit value	***	***	***
Middle East	Unit value	***	***	***
South/Central America	Unit value	***	***	***
All other markets	Unit value	***	***	***
All markets	Unit value	***	***	***
United States	Ratio	***	***	***
European Union	Ratio	***	***	***
Asia	Ratio	***	***	***
Middle East	Ratio	***	***	***
South/Central America	Ratio	***	***	***
All other markets	Ratio	***	***	***
All markets	Ratio	***	***	***

Table continued.

Table IV-24 Continued

Uncoated paper: Producers' and exporters' in Indonesia exports, by destination market and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; ratio in percent

Destination market	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
United States	Quantity	***	***	***	***	***
European Union	Quantity	***	***	***	***	***
Asia	Quantity	***	***	***	***	***
Middle East	Quantity	***	***	***	***	***
South/Central America	Quantity	***	***	***	***	***
All other markets	Quantity	***	***	***	***	***
All markets	Quantity	***	***	***	***	***
United States	Value	***	***	***	***	***
European Union	Value	***	***	***	***	***
Asia	Value	***	***	***	***	***
Middle East	Value	***	***	***	***	***
South/Central America	Value	***	***	***	***	***
All other markets	Value	***	***	***	***	***
All markets	Value	***	***	***	***	***
United States	Unit value	***	***	***	***	***
European Union	Unit value	***	***	***	***	***
Asia	Unit value	***	***	***	***	***
Middle East	Unit value	***	***	***	***	***
South/Central America	Unit value	***	***	***	***	***
All other markets	Unit value	***	***	***	***	***
All markets	Unit value	***	***	***	***	***
United States	Ratio	***	***	***	***	***
European Union	Ratio	***	***	***	***	***
Asia	Ratio	***	***	***	***	***
Middle East	Ratio	***	***	***	***	***
South/Central America	Ratio	***	***	***	***	***
All other markets	Ratio	***	***	***	***	***
All markets	Ratio	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Ratio represents the ratio of export shipments to production.

Alternative products

As shown in table IV-25, responding Indonesian firms produced other products on the same equipment and machinery used to produce uncoated paper.

Table IV-25
Uncoated paper: Indonesian producers' overall sheeting capacity and production on the same equipment as subject production, by period

Quantity in short tons; share and ratio in percent

Item	Measure	2015	2016	2017
Overall sheeting capacity	Quantity	***	***	***
Production: Uncoated paper	Quantity	***	***	***
Production: Sheets over 150 gsm	Quantity	***	***	***
Production: Coated paper	Quantity	***	***	***
Production: Other products	Quantity	***	***	***
Production: Out-of-scope products	Quantity	***	***	***
Production: All products on same machinery	Quantity	***	***	***
Overall sheeting capacity utilization	Ratio	***	***	***
Production: Uncoated paper	Share	***	***	***
Production: Sheets over 150 gsm	Share	***	***	***
Production: Coated paper	Share	***	***	***
Production: Other products	Share	***	***	***
Production: Out-of-scope products	Share	***	***	***
Production: All products on same machinery	Share	***	***	***

Table continued.

Table IV-25 Continued

Uncoated paper: Indonesian producers' overall sheeting capacity and production on the same equipment as subject production, by period

Quantity in short tons; share and ratio in percent

Item	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Overall sheeting capacity	Quantity	***	***	***	***	***
Production: Uncoated paper	Quantity	***	***	***	***	***
Production: Sheets over 150 gsm	Quantity	***	***	***	***	***
Production: Coated paper	Quantity	***	***	***	***	***
Production: Other products	Quantity	***	***	***	***	***
Production: Out-of-scope products	Quantity	***	***	***	***	***
Production: All products on same machinery	Quantity	***	***	***	***	***
Overall sheeting capacity utilization	Ratio	***	***	***	***	***
Production: Uncoated paper	Share	***	***	***	***	***
Production: Sheets over 150 gsm	Share	***	***	***	***	***
Production: Coated paper	Share	***	***	***	***	***
Production: Other products	Share	***	***	***	***	***
Production: Out-of-scope products	Share	***	***	***	***	***
Production: All products on same machinery	Share	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Exports

Table IV-26 presents data for exports of uncoated paper and paperboard from Indonesia in descending order of quantity for 2020. During 2020, the United States was among the smallest export markets for uncoated paper and paperboard from Indonesia, by quantity, accounting for less than 0.05 percent. The largest export market in 2020 for uncoated paper and paperboard from Indonesia, by quantity, was China, accounting for 18.1 percent.

Table IV-26
Uncoated paper and paperboard: Exports from Indonesia, by period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2015	2016	2017
United States	Quantity	140,074	38,957	19,698
China	Quantity	16,582	41,143	129,497
Japan	Quantity	404,511	358,155	321,480
Philippines	Quantity	90,664	106,360	137,050
Malaysia	Quantity	163,027	176,101	182,218
Taiwan	Quantity	63,698	71,566	75,240
Korea	Quantity	65,835	53,775	40,588
Vietnam	Quantity	75,160	82,422	89,548
United Arab Emirates	Quantity	76,472	49,124	58,599
All other destination markets	Quantity	994,787	1,214,079	1,435,480
All destination markets	Quantity	2,090,811	2,191,681	2,489,400
United States	Value	99,502	26,809	12,879
China	Value	11,417	25,162	77,538
Japan	Value	325,122	293,240	264,421
Philippines	Value	52,708	61,976	80,433
Malaysia	Value	111,255	113,429	121,001
Taiwan	Value	41,715	44,617	50,335
Korea	Value	43,559	34,605	27,559
Vietnam	Value	47,639	52,432	58,270
United Arab Emirates	Value	54,449	34,866	37,740
All other destination markets	Value	671,286	787,175	915,095
All destination markets	Value	1,458,652	1,474,312	1,645,271

Table continued.

Table IV-26 Continued
Uncoated paper and paperboard: Exports from Indonesia, by period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2018	2019	2020
United States	Quantity	6,023	155	36
China	Quantity	133,182	68,020	399,811
Japan	Quantity	302,194	331,999	304,109
Philippines	Quantity	118,218	118,643	172,051
Malaysia	Quantity	145,024	163,262	136,023
Taiwan	Quantity	88,441	79,730	95,457
Korea	Quantity	90,465	97,589	92,926
Vietnam	Quantity	86,866	72,872	75,599
United Arab Emirates	Quantity	55,067	84,962	58,386
All other destination markets	Quantity	1,194,416	1,354,720	871,358
All destination markets	Quantity	2,219,897	2,371,952	2,205,755
United States	Value	4,125	120	28
China	Value	102,934	45,279	189,180
Japan	Value	255,403	271,157	242,855
Philippines	Value	83,142	74,587	95,023
Malaysia	Value	113,520	114,346	87,445
Taiwan	Value	68,271	55,170	59,742
Korea	Value	63,802	62,461	52,554
Vietnam	Value	66,442	51,610	48,880
United Arab Emirates	Value	40,689	55,184	32,192
All other destination markets	Value	888,558	922,417	523,660
All destination markets	Value	1,686,886	1,652,332	1,331,561

Table continued.

Table IV-26-Continued
Uncoated paper: Exports from Indonesia, by period

Unit value in dollars per short ton; share in percent

Destination market	Measure	2015	2016	2017
United States	Unit value	710	688	654
China	Unit value	688	612	599
Japan	Unit value	804	819	823
Philippines	Unit value	581	583	587
Malaysia	Unit value	682	644	664
Taiwan	Unit value	655	623	669
Korea	Unit value	662	644	679
Vietnam	Unit value	634	636	651
United Arab Emirates	Unit value	712	710	644
All other destination markets	Unit value	675	648	637
All destination markets	Unit value	698	673	661
United States	Share of quantity	6.7	1.8	0.8
China	Share of quantity	0.8	1.9	5.2
Japan	Share of quantity	19.3	16.3	12.9
Philippines	Share of quantity	4.3	4.9	5.5
Malaysia	Share of quantity	7.8	8.0	7.3
Taiwan	Share of quantity	3.0	3.3	3.0
Korea	Share of quantity	3.1	2.5	1.6
Vietnam	Share of quantity	3.6	3.8	3.6
United Arab Emirates	Share of quantity	3.7	2.2	2.4
All other destination markets	Share of quantity	47.6	55.4	57.7
All destination markets	Share of quantity	100.0	100.0	100.0

Table continued.

Table IV-26 Continued
Uncoated paper and paperboard: Exports from Indonesia, by period

Unit value in dollars per short ton; share in percent

Destination market	Measure	2018	2019	2020
United States	Unit value	685	775	777
China	Unit value	773	666	473
Japan	Unit value	845	817	799
Philippines	Unit value	703	629	552
Malaysia	Unit value	783	700	643
Taiwan	Unit value	772	692	626
Korea	Unit value	705	640	566
Vietnam	Unit value	765	708	647
United Arab Emirates	Unit value	739	650	551
All other destination markets	Unit value	744	681	601
All destination markets	Unit value	760	697	604
United States	Share of quantity	0.3	0.0	0.0
China	Share of quantity	6.0	2.9	18.1
Japan	Share of quantity	13.6	14.0	13.8
Philippines	Share of quantity	5.3	5.0	7.8
Malaysia	Share of quantity	6.5	6.9	6.2
Taiwan	Share of quantity	4.0	3.4	4.3
Korea	Share of quantity	4.1	4.1	4.2
Vietnam	Share of quantity	3.9	3.1	3.4
United Arab Emirates	Share of quantity	2.5	3.6	2.6
All other destination markets	Share of quantity	53.8	57.1	39.5
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 4802.56 and 4802.57 reported by Statistics Indonesia in the Global Trade Atlas database, accessed September 15, 2021.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "--". United States is shown at the top, all remaining top export destinations shown in descending order of 2020 data. HS subheadings 4802.56 and 4802.57 are basket categories that contain products outside the scope of these reviews.

The industry in Portugal

Overview

During the final phase of the original investigations, the Commission received a foreign producer/exporter questionnaire from one firm, The Portucel Soporcel Group, which accounted for all known production and exports of uncoated paper from Portugal to the United States during 2014. In these first full five-year reviews, the Commission issued a foreign producer/exporter questionnaire to and received a response from The Navigator Company ("Navigator"), which was the lone firm identified as a possible producer or exporter of uncoated paper in Portugal. By its estimate, Navigator accounted for approximately *** percent of uncoated paper production and *** percent of exports of uncoated paper from Portugal to the United States in Portugal during 2020.

Table IV-27 presents information on the uncoated paper operations of the responding producer in Portugal.

Table IV-27
Uncoated paper: Summary data for producers in Portugal, 2020

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Navigator	***	***	***	***	***	***
All firms	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Changes in operations

As presented in table IV-28 producers in Portugal reported several operational and organizational changes since January 1, 2015.

Table IV-28

Uncoated paper: Portuguese producers' reported changes in operations, since January 1, 2015

Item	Firm name and accompanying narrative response
Contractions or re-purposing	***
Prolonged shutdowns or curtailments	***
Other	***

Source: Compiled from data submitted in response to Commission questionnaires.

Operations on uncoated paper

Table IV-29 presents data on the uncoated paper operations of the responding producer in Portugal for 2015-20, interim 2020, and interim 2021. Table IV-30 presents data on the responding Portuguese producer's export shipments by market. Sheeting capacity in Portugal *** during 2015-19 and then decreased by *** percent from 2019 to 2020.⁴⁸ Sheeting capacity was *** short tons (***) higher in interim 2021 than in interim 2020. Navigator's production of uncoated paper decreased in each year during 2015-20, except from 2016 to 2017, ending *** percent lower in 2020 than in 2015.⁴⁹ Production in Portugal was *** percent higher in interim 2021 than in interim 2020.⁵⁰ Sheeting capacity utilization in

⁴⁸ The decrease in sheeting capacity between the interim periods was *** Email from ***, September 28, 2021.

⁴⁹ ***. Email from ***, September 28, 2021.

⁵⁰ ***.

Portugal decreased by *** percentage points from 2015 to 2020.⁵¹ Sheeting capacity utilization was *** percentage points higher in interim 2021 than interim 2020.⁵²

End-of-period inventories fluctuated from year to year, but ultimately increased *** percent from 2015 to 2020. End-of-period inventories increased by *** percent from 2015 to 2018, then decreased by *** percent during 2018-19, before increasing by *** percent from 2019 to 2020. End-of-period inventories were *** percent lower in interim 2021 than interim 2020.

Home market shipments accounted for between *** percent of total shipments from 2015 to 2020. Home market shipments, by quantity, decreased *** percent from 2015 to 2016 before increasing *** percent from 2016 to 2018, and decreasing *** percent from 2018 to 2020, ending *** percent lower in 2020 than in 2015. It was *** percent higher in interim 2021 than in interim 2020. The value of home market shipments decreased *** percent from 2015-16, and then increased *** percent from 2016 to 2018, before decreasing *** percent from 2018 to 2020, ending *** percent lower in 2020 than in 2015. It was *** percent higher in interim 2021 than in interim 2020. The unit value of home market shipments increased from 2015 to 2018 and decreased 2018 to 2020.

Export shipments accounted for *** percent of Navigator's total shipments during 2015-20, with the majority of exports going to the ***. Export shipments, by quantity, decreased in each year from 2015 to 2020, ending *** percent lower in 2020 than 2015.⁵³ However, were *** percent higher in interim 2021 than in interim 2020.⁵⁴ The value of export shipments decreased by *** percent from 2015 to 2016, and then increased *** percent from 2016 to 2018, before decreasing *** percent from 2018 to 2020, ending *** percent lower in 2020 than in 2015. Export shipments, by value, were *** percent higher in interim

***. Email from ***, September 28, 2021.

⁵¹ ***. Email from ***, September 28, 2021.

⁵² ***. Email from ***, September 28, 2021.

⁵³ ***. Email from ***, September 28, 2021.

⁵⁴ ***. Email from ***, September 28, 2021.

2021 than in interim 2020. The *** represents the largest export market in each year from 2015 to 2020 and in interim 2021.⁵⁵

Table IV-29
Uncoated paper: Portuguese sheeting capacity, production, shipments, and inventories, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2015	2016	2017
Sheeting capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***

Table continued.

⁵⁵ Navigator reports that the EU is by far their largest and most important market. A representative from Navigator testified, "As an EU member, we have obvious advantages selling in the region in terms of common currency, customs conveniences, and geographic proximity. The recent capacity closures in Finland and France also make Europe even more attractive to us." Hearing transcript, p. 152 (Dutt).

Table IV-29 Continued

Uncoated paper: Portuguese sheeting capacity, production, shipments, and inventories, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Sheeting capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued.

Table IV-29 Continued

Uncoated paper: Portuguese sheeting capacity, production, shipments, and inventories, by period

Unit value in dollars per short ton; ratio and share in percent

Item	Measure	2015	2016	2017
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Sheeting capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Export shipments	Share	***	***	***
Total shipments	Share	***	***	***

Table continued.

Table IV-29 Continued

Uncoated paper: Portuguese sheeting capacity, production, shipments, and inventories, by period

Unit value in dollars per short ton; ratio and share in percent

Item	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Sheeting capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export shipments	Share	***	***	***	***	***
Total shipments	Share	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeros, null values, and undefined calculations are suppressed and shown as "---".

Table IV-30

Uncoated paper: Producers' and exporters' in Portugal exports, by destination market and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; ratio to production

Destination market	Measure	2015	2016	2017
United States	Quantity	***	***	***
European Union	Quantity	***	***	***
Asia	Quantity	***	***	***
Middle East	Quantity	***	***	***
South/Central America	Quantity	***	***	***
All other markets	Quantity	***	***	***
All markets	Quantity	***	***	***
United States	Value	***	***	***
European Union	Value	***	***	***
Asia	Value	***	***	***
Middle East	Value	***	***	***
South/Central America	Value	***	***	***
All other markets	Value	***	***	***
All markets	Value	***	***	***
United States	Unit value	***	***	***
European Union	Unit value	***	***	***
Asia	Unit value	***	***	***
Middle East	Unit value	***	***	***
South/Central America	Unit value	***	***	***
All other markets	Unit value	***	***	***
All markets	Unit value	***	***	***
United States	Ratio	***	***	***
European Union	Ratio	***	***	***
Asia	Ratio	***	***	***
Middle East	Ratio	***	***	***
South/Central America	Ratio	***	***	***
All other markets	Ratio	***	***	***
All markets	Ratio	***	***	***

Table continued.

Table IV-30- Continued

Uncoated paper: Producers' and exporters' in Portugal exports, by destination market and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; ratio in percent

Destination market	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
United States	Quantity	***	***	***	***	***
European Union	Quantity	***	***	***	***	***
Asia	Quantity	***	***	***	***	***
Middle East	Quantity	***	***	***	***	***
South/Central America	Quantity	***	***	***	***	***
All other markets	Quantity	***	***	***	***	***
All markets	Quantity	***	***	***	***	***
United States	Value	***	***	***	***	***
European Union	Value	***	***	***	***	***
Asia	Value	***	***	***	***	***
Middle East	Value	***	***	***	***	***
South/Central America	Value	***	***	***	***	***
All other markets	Value	***	***	***	***	***
All markets	Value	***	***	***	***	***
United States	Unit value	***	***	***	***	***
European Union	Unit value	***	***	***	***	***
Asia	Unit value	***	***	***	***	***
Middle East	Unit value	***	***	***	***	***
South/Central America	Unit value	***	***	***	***	***
All other markets	Unit value	***	***	***	***	***
All markets	Unit value	***	***	***	***	***
United States	Ratio	***	***	***	***	***
European Union	Ratio	***	***	***	***	***
Asia	Ratio	***	***	***	***	***
Middle East	Ratio	***	***	***	***	***
South/Central America	Ratio	***	***	***	***	***
All other markets	Ratio	***	***	***	***	***
All markets	Ratio	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Ratio represents the ratio of export shipments to production.

Alternative products

As shown in table IV-31, responding Portuguese firms produced other products on the same equipment and machinery used to produce uncoated paper.

Table IV-31

Uncoated paper: Portuguese producers' overall sheeting capacity and production on the same equipment as subject production, by period

Quantity in short tons; share and ratio in percent

Item	Measure	2015	2016	2017
Overall sheeting capacity	Quantity	***	***	***
Production: Uncoated paper	Quantity	***	***	***
Production: Sheets over 150 gsm	Quantity	***	***	***
Production: Coated paper	Quantity	***	***	***
Production: Other products	Quantity	***	***	***
Production: Out-of-scope products	Quantity	***	***	***
Production: All products on same machinery	Quantity	***	***	***
Overall sheeting capacity utilization	Ratio	***	***	***
Production: Uncoated paper	Share	***	***	***
Production: Sheets over 150 gsm	Share	***	***	***
Production: Coated paper	Share	***	***	***
Production: Other products	Share	***	***	***
Production: Out-of-scope products	Share	***	***	***
Production: All products on same machinery	Share	***	***	***

Table continued.

Table IV-31 Continued
Uncoated paper: Portuguese producers' overall sheeting capacity and production on the same equipment as subject production, by period

Quantity in short tons; share and ratio in percent

Item	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Overall sheeting capacity	Quantity	***	***	***	***	***
Production: Uncoated paper	Quantity	***	***	***	***	***
Production: Sheets over 150 gsm	Quantity	***	***	***	***	***
Production: Coated paper	Quantity	***	***	***	***	***
Production: Other products	Quantity	***	***	***	***	***
Production: Out-of-scope products	Quantity	***	***	***	***	***
Production: All products on same machinery	Quantity	***	***	***	***	***
Overall sheeting capacity utilization	Ratio	***	***	***	***	***
Production: Uncoated paper	Share	***	***	***	***	***
Production: Sheets over 150 gsm	Share	***	***	***	***	***
Production: Coated paper	Share	***	***	***	***	***
Production: Other products	Share	***	***	***	***	***
Production: Out-of-scope products	Share	***	***	***	***	***
Production: All products on same machinery	Share	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "—".

30 10 11 PAGE NO

Exports

Table IV-32 presents data for exports of uncoated paper and paperboard from Portugal in descending order of quantity for 2020. During 2020, the United States was the fourth largest export market for uncoated paper and paperboard from Portugal, by quantity, accounting for 9.6 percent. The largest export market for uncoated paper and paperboard from Portugal in 2020, by quantity, was France, accounting for 13.3 percent.

Table IV-32
Uncoated paper and paperboard: Exports from Portugal, by period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2015	2016	2017
United States	Quantity	180,790	150,690	125,366
France	Quantity	146,938	157,951	169,313
Germany	Quantity	167,122	167,563	159,779
Spain	Quantity	144,621	136,896	129,989
United Kingdom	Quantity	101,627	101,244	96,475
Italy	Quantity	106,831	114,682	107,340
Egypt	Quantity	38,035	38,876	43,270
Netherlands	Quantity	36,894	35,381	35,775
Belgium	Quantity	31,018	31,659	26,793
All other destination markets	Quantity	310,901	307,179	342,541
All destination markets	Quantity	1,264,778	1,242,121	1,236,640
United States	Value	156,174	131,010	114,325
France	Value	122,201	130,025	140,239
Germany	Value	138,415	137,935	134,257
Spain	Value	119,091	114,213	109,077
United Kingdom	Value	95,749	85,082	79,378
Italy	Value	84,307	91,103	87,224
Egypt	Value	29,885	29,299	32,908
Netherlands	Value	29,583	28,648	29,121
Belgium	Value	27,005	27,736	23,468
All other destination markets	Value	242,687	233,615	266,947
All destination markets	Value	1,045,097	1,008,665	1,016,943

Table continued.

Table IV-32 Continued
Uncoated paper: Exports from Portugal, by period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2018	2019	2020
United States	Quantity	139,719	109,412	88,162
France	Quantity	150,340	150,439	122,256
Germany	Quantity	150,736	142,900	121,644
Spain	Quantity	116,146	108,996	89,191
United Kingdom	Quantity	91,972	88,292	74,813
Italy	Quantity	80,739	74,140	69,879
Egypt	Quantity	39,383	46,272	47,360
Netherlands	Quantity	37,546	34,039	31,968
Belgium	Quantity	27,841	26,189	21,334
All other destination markets	Quantity	347,378	287,378	252,081
All destination markets	Quantity	1,181,800	1,068,057	918,687
United States	Value	121,530	98,269	74,673
France	Value	141,407	139,270	106,250
Germany	Value	142,835	131,530	106,512
Spain	Value	110,462	103,256	78,954
United Kingdom	Value	88,070	82,250	63,459
Italy	Value	76,237	68,020	59,398
Egypt	Value	33,878	37,022	33,775
Netherlands	Value	33,484	30,168	26,194
Belgium	Value	27,217	25,262	19,992
All other destination markets	Value	303,262	246,330	198,890
All destination markets	Value	1,078,381	961,377	768,096

Table continued.

PAGE TWO

Table IV-32 Continued
Uncoated paper: Exports from Portugal, by period

Unit value in dollars per short ton; share in percent

Destination market	Measure	2015	2016	2017
United States	Unit value	864	869	912
France	Unit value	832	823	828
Germany	Unit value	828	823	840
Spain	Unit value	823	834	839
United Kingdom	Unit value	942	840	823
Italy	Unit value	789	794	813
Egypt	Unit value	786	754	761
Netherlands	Unit value	802	810	814
Belgium	Unit value	871	876	876
All other destination markets	Unit value	781	761	779
All destination markets	Unit value	826	812	822
United States	Share of quantity	14.3	12.1	10.1
France	Share of quantity	11.6	12.7	13.7
Germany	Share of quantity	13.2	13.5	12.9
Spain	Share of quantity	11.4	11.0	10.5
United Kingdom	Share of quantity	8.0	8.2	7.8
Italy	Share of quantity	8.4	9.2	8.7
Egypt	Share of quantity	3.0	3.1	3.5
Netherlands	Share of quantity	2.9	2.8	2.9
Belgium	Share of quantity	2.5	2.5	2.2
All other destination markets	Share of quantity	24.6	24.7	27.7
All destination markets	Share of quantity	100.0	100.0	100.0

Table continued.

BRUNO

Table IV-32 Continued
Uncoated paper: Exports from Portugal, by period

Unit value in dollars per short ton; share in percent

Destination market	Measure	2018	2019	2020
United States	Unit value	870	898	847
France	Unit value	941	926	869
Germany	Unit value	948	920	876
Spain	Unit value	951	947	885
United Kingdom	Unit value	958	932	848
Italy	Unit value	944	917	850
Egypt	Unit value	860	800	713
Netherlands	Unit value	892	886	819
Belgium	Unit value	978	965	937
All other destination markets	Unit value	873	857	789
All destination markets	Unit value	912	900	836
United States	Share of quantity	11.8	10.2	9.6
France	Share of quantity	12.7	14.1	13.3
Germany	Share of quantity	12.8	13.4	13.2
Spain	Share of quantity	9.8	10.2	9.7
United Kingdom	Share of quantity	7.8	8.3	8.1
Italy	Share of quantity	6.8	6.9	7.6
Egypt	Share of quantity	3.3	4.3	5.2
Netherlands	Share of quantity	3.2	3.2	3.5
Belgium	Share of quantity	2.4	2.5	2.3
All other destination markets	Share of quantity	29.4	26.9	27.4
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 4802.56 and 4802.57 reported by Statistics Indonesia in the Global Trade Atlas database, accessed September 15, 2021.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top, all remaining top export destinations shown in descending order of 2020 data. HS subheadings 4802.56 and 4802.57 are basket categories that contain products outside the scope of these reviews.

Subject countries combined

Table IV-33 presents summary data on uncoated paper operations of the reporting producers in the subject countries for 2015-20, interim 2020, and interim 2021 and table IV-34 presents data on the responding producers' export shipments by market. Sheeting capacity fluctuated during 2015-20, ending *** percent lower in 2015 than in 2020. Sheeting capacity was *** percent lower in interim 2021 than interim 2020. Production increased by *** percent during 2015-17, and then decreased by *** percent during 2017-20, ending *** percent lower in 2015 than in 2020. The majority of the decrease occurred from 2019 to 2020 when production decreased by *** percent. Production was *** percent higher in interim 2021 than interim 2020. Export and home market shipments irregularly decreased during 2015-20, with the largest year-to-year decrease occurring between 2019 and 2020. Export and home market shipments were higher in interim 2021 than in interim 2020.

Table IV-33
Uncoated paper: Data on the industry in subject countries, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2015	2016	2017
Sheeting capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Export shipments	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Export shipments	Value	***	***	***
Total shipments	Value	***	***	***

Table continued.

Table IV-33 Continued
Uncoated paper: Data on the industry in subject countries, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Sheeting capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export shipments	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export shipments	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued.

Table IV-33 Continued
Uncoated paper: Data on the industry in subject countries, by period

Unit value in dollars per short ton; ratio and share in percent

Item	Measure	2015	2016	2017
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Export shipments	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Sheeting capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Export shipments	Share	***	***	***
Total shipments	Share	***	***	***

Table continued.

Table IV-33 Continued
Uncoated paper: Data on the industry in subject countries, by period

Unit value in dollars per short ton; ratio and share in percent

Item	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export shipments	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Sheeting capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export shipments	Share	***	***	***	***	***
Total shipments	Share	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "----".

Table IV-34

Uncoated paper: Producers' and exporters' in subject countries exports, by destination market and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; ratio in percent

Destination market	Measure	2015	2016	2017
United States	Quantity	***	***	***
European Union	Quantity	***	***	***
Asia	Quantity	***	***	***
Middle East	Quantity	***	***	***
South/Central America	Quantity	***	***	***
All other markets	Quantity	***	***	***
All markets	Quantity	***	***	***
United States	Value	***	***	***
European Union	Value	***	***	***
Asia	Value	***	***	***
Middle East	Value	***	***	***
South/Central America	Value	***	***	***
All other markets	Value	***	***	***
All markets	Value	***	***	***
United States	Unit value	***	***	***
European Union	Unit value	***	***	***
Asia	Unit value	***	***	***
Middle East	Unit value	***	***	***
South/Central America	Unit value	***	***	***
All other markets	Unit value	***	***	***
All markets	Unit value	***	***	***
United States	Ratio	***	***	***
European Union	Ratio	***	***	***
Asia	Ratio	***	***	***
Middle East	Ratio	***	***	***
South/Central America	Ratio	***	***	***
All other markets	Ratio	***	***	***
All markets	Ratio	***	***	***

Table continued.

Table IV-34 Continued

Uncoated paper: Producers' and exporters' in subject countries exports, by destination market and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; ratio in percent

Destination market	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
United States	Quantity	***	***	***	***	***
European Union	Quantity	***	***	***	***	***
Asia	Quantity	***	***	***	***	***
Middle East	Quantity	***	***	***	***	***
South/Central America	Quantity	***	***	***	***	***
All other markets	Quantity	***	***	***	***	***
All markets	Quantity	***	***	***	***	***
United States	Value	***	***	***	***	***
European Union	Value	***	***	***	***	***
Asia	Value	***	***	***	***	***
Middle East	Value	***	***	***	***	***
South/Central America	Value	***	***	***	***	***
All other markets	Value	***	***	***	***	***
All markets	Value	***	***	***	***	***
United States	Unit value	***	***	***	***	***
European Union	Unit value	***	***	***	***	***
Asia	Unit value	***	***	***	***	***
Middle East	Unit value	***	***	***	***	***
South/Central America	Unit value	***	***	***	***	***
All other markets	Unit value	***	***	***	***	***
All markets	Unit value	***	***	***	***	***
United States	Ratio	***	***	***	***	***
European Union	Ratio	***	***	***	***	***
Asia	Ratio	***	***	***	***	***
Middle East	Ratio	***	***	***	***	***
South/Central America	Ratio	***	***	***	***	***
All other markets	Ratio	***	***	***	***	***
All markets	Ratio	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Ratio represents the ratio of exports shipments to production.

PAGE NO

Alternative products

As shown in table IV-35, responding subject foreign producers produced other products on the same equipment and machinery used to produce uncoated paper.

Table IV-35
Uncoated paper: Overall sheeting capacity and production on the same equipment as in-scope production by producers from subject sources by period

Quantity in short tons; share and ratio in percent

Item	Measure	2015	2016	2017
Overall sheeting capacity	Quantity	***	***	***
Production: Uncoated paper	Quantity	***	***	***
Production: Sheets over 150 gsm	Quantity	***	***	***
Production: Coated paper	Quantity	***	***	***
Production: Other products	Quantity	***	***	***
Production: Out-of-scope products	Quantity	***	***	***
Production: All products on same machinery	Quantity	***	***	***
Overall sheeting capacity utilization	Ratio	***	***	***
Production: Uncoated paper	Share	***	***	***
Production: Sheets over 150 gsm	Share	***	***	***
Production: Coated paper	Share	***	***	***
Production: Other products	Share	***	***	***
Production: Out-of-scope products	Share	***	***	***
Production: All products on same machinery	Share	***	***	***

Table continued.

Table IV-35 Continued

Uncoated paper: Overall sheeting capacity and production on the same equipment as in-scope production by producers from subject sources by period

Quantity in short tons; share and ratio in percent

Item	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Overall sheeting capacity	***	***	***	***	***
Production: Uncoated paper	***	***	***	***	***
Production: Sheets over 150 gsm	***	***	***	***	***
Production: Coated paper	***	***	***	***	***
Production: Other products	***	***	***	***	***
Production: Out-of-scope products	***	***	***	***	***
Production: All products on same machinery	***	***	***	***	***
Overall sheeting capacity utilization	***	***	***	***	***
Production: Uncoated paper	***	***	***	***	***
Production: Sheets over 150 gsm	***	***	***	***	***
Production: Coated paper	***	***	***	***	***
Production: Other products	***	***	***	***	***
Production: Out-of-scope products	***	***	***	***	***
Production: All products on same machinery	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "--".

Antidumping or countervailing duty orders in third-country markets

There are several known trade remedy actions on uncoated paper from subject countries in third-country markets. These include Australia (antidumping measures covering A4 copy paper from Brazil, China, and Indonesia, and a countervailing measure covering A4 copy paper from China); India (an antidumping measure covering uncoated copy paper from Indonesia); Mexico (an antidumping measure in effect on cut bond paper from Brazil); and Pakistan (antidumping measures covering uncoated printing and writing papers from Brazil, China, and Indonesia).⁵⁶

Global market

Table IV-36 presents data for global exports of uncoated paper and paperboard by exporter in descending order of quantity for 2020. In 2020, Indonesia was the largest exporter of uncoated paper and paperboard in 2020, accounting for 24.3 percent of global exports, followed by Portugal, accounting for 10.1 percent of global exports. The United States accounted for 2.0 percent of global exports of uncoated paper and paperboard in 2020.

⁵⁶ Domestic interested parties' response to notice of institution, March 3, 2021, pp. 15-16.

Table IV-36
Uncoated paper: Global exports by exporter by year

Quantity in short tons; value in 1,000 dollars

Exporting country	Measure	2015	2016	2017
United States	Quantity	375,367	384,896	380,864
Indonesia	Quantity	2,090,811	2,191,681	2,489,400
Portugal	Quantity	1,264,778	1,242,121	1,236,640
China	Quantity	811,307	881,677	782,405
Brazil	Quantity	733,917	682,688	666,904
Singapore	Quantity	550,131	608,896	956,501
Slovakia	Quantity	548,347	579,915	548,951
Thailand	Quantity	471,010	560,145	574,924
Germany	Quantity	594,931	503,727	507,623
Finland	Quantity	407,607	393,107	426,806
Poland	Quantity	446,883	386,759	392,288
France	Quantity	315,630	324,645	312,647
All other exporters	Quantity	2,346,633	2,243,544	2,244,076
All reporting exporters	Quantity	10,957,353	10,983,802	11,520,028
United States	Value	396,814	388,367	371,325
Indonesia	Value	1,458,652	1,474,312	1,645,271
Portugal	Value	1,045,097	1,008,665	1,016,943
China	Value	618,778	645,758	565,447
Brazil	Value	589,655	482,877	460,104
Singapore	Value	407,430	426,066	661,551
Slovakia	Value	368,936	391,388	389,636
Thailand	Value	408,286	452,818	466,256
Germany	Value	613,043	562,875	570,570
Finland	Value	273,653	275,729	307,457
Poland	Value	380,029	345,307	360,315
France	Value	359,855	340,723	325,479
All other exporters	Value	2,196,295	2,060,818	2,154,657
All reporting exporters	Value	9,116,523	8,855,704	9,295,011

Table continued.

Table IV-36- Continued
 Uncoated paper: Global exports by exporter by year

Quantity in short tons; value in 1,000 dollars

Exporting country	Measure	2018	2019	2020
United States	Quantity	348,165	292,113	185,067
Indonesia	Quantity	2,219,897	2,371,952	2,205,755
Portugal	Quantity	1,181,800	1,068,057	918,687
China	Quantity	616,054	669,040	485,584
Brazil	Quantity	653,547	668,290	550,464
Singapore	Quantity	642,648	705,959	654,017
Slovakia	Quantity	552,919	539,902	487,686
Thailand	Quantity	509,046	528,135	426,796
Germany	Quantity	496,065	480,005	407,989
Finland	Quantity	428,481	370,903	296,636
Poland	Quantity	406,044	413,712	392,555
France	Quantity	262,966	247,667	186,775
All other exporters	Quantity	2,170,856	2,147,773	1,897,406
All reporting exporters	Quantity	10,488,486	10,503,509	9,095,418
United States	Value	367,650	304,518	189,490
Indonesia	Value	1,686,886	1,652,332	1,331,561
Portugal	Value	1,078,381	961,377	768,096
China	Value	484,286	525,054	373,602
Brazil	Value	498,616	487,037	347,491
Singapore	Value	533,814	542,067	433,342
Slovakia	Value	450,638	411,559	335,164
Thailand	Value	459,158	474,634	371,860
Germany	Value	595,637	608,922	509,950
Finland	Value	350,638	298,424	221,430
Poland	Value	419,316	409,404	370,869
France	Value	324,475	266,746	194,828
All other exporters	Value	2,239,691	2,283,717	1,933,712
All reporting exporters	Value	9,489,186	9,225,791	7,381,396

Table continued.

Table IV-36- Continued
 Uncoated paper: Global exports by exporter by year

Unit value in dollars per short ton; share in percent

Exporting country	Measure	2015	2016	2017
United States	Unit value	1,057	1,009	975
Indonesia	Unit value	698	673	661
Portugal	Unit value	826	812	822
China	Unit value	763	732	723
Brazil	Unit value	803	707	690
Singapore	Unit value	741	700	692
Slovakia	Unit value	673	675	710
Thailand	Unit value	867	808	811
Germany	Unit value	1,030	1,117	1,124
Finland	Unit value	671	701	720
Poland	Unit value	850	893	918
France	Unit value	1,140	1,050	1,041
All other exporters	Unit value	936	919	960
All reporting exporters	Unit value	832	806	807
United States	Share of quantity	3.4	3.5	3.3
Indonesia	Share of quantity	19.1	20.0	21.6
Portugal	Share of quantity	11.5	11.3	10.7
China	Share of quantity	7.4	8.0	6.8
Brazil	Share of quantity	6.7	6.2	5.8
Singapore	Share of quantity	5.0	5.5	8.3
Slovakia	Share of quantity	5.0	5.3	4.8
Thailand	Share of quantity	4.3	5.1	5.0
Germany	Share of quantity	5.4	4.6	4.4
Finland	Share of quantity	3.7	3.6	3.7
Poland	Share of quantity	4.1	3.5	3.4
France	Share of quantity	2.9	3.0	2.7
All other exporters	Share of quantity	21.4	20.4	19.5
All reporting exporters	Share of quantity	100.0	100.0	100.0

Table continued.

PAGE NO

Table IV-36- Continued
Uncoated paper: Global exports by exporter by year

Unit value in dollars per short ton; share in percent

Exporting country	Measure	2018	2019	2020
United States	Unit value	1,056	1,042	1,024
Indonesia	Unit value	760	697	604
Portugal	Unit value	912	900	836
China	Unit value	786	785	769
Brazil	Unit value	763	729	631
Singapore	Unit value	831	768	663
Slovakia	Unit value	815	762	687
Thailand	Unit value	902	899	871
Germany	Unit value	1,201	1,269	1,250
Finland	Unit value	818	805	746
Poland	Unit value	1,033	990	945
France	Unit value	1,234	1,077	1,043
All other exporters	Unit value	1,032	1,063	1,019
All reporting exporters	Unit value	905	878	812
United States	Share of quantity	3.3	2.8	2.0
Indonesia	Share of quantity	21.2	22.6	24.3
Portugal	Share of quantity	11.3	10.2	10.1
China	Share of quantity	5.9	6.4	5.3
Brazil	Share of quantity	6.2	6.4	6.1
Singapore	Share of quantity	6.1	6.7	7.2
Slovakia	Share of quantity	5.3	5.1	5.4
Thailand	Share of quantity	4.9	5.0	4.7
Germany	Share of quantity	4.7	4.6	4.5
Finland	Share of quantity	4.1	3.5	3.3
Poland	Share of quantity	3.9	3.9	4.3
France	Share of quantity	2.5	2.4	2.1
All other exporters	Share of quantity	20.7	20.4	20.9
All reporting exporters	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 4802.56 and 4802.57 reported by various national statistical authorities in the Global Trade Atlas database, accessed September 15, 2021.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top followed by the countries under investigation, all remaining top exporting countries in descending order of 2020 data. HS subheadings 4802.56 and 4802.57 are basket categories that contain products outside the scope of these reviews.

Part V: Pricing data

Factors affecting prices

Raw material costs

The major U.S. producers of uncoated paper are vertically integrated. In 2020 the major producers were Domtar, International Paper, and Boise. Accordingly, the raw materials used in the production of uncoated paper include paper pulp (which most U.S. producers produce), recycled fibers (used in recycled paper), which most U.S. producers purchase, and a range of chemicals. As discussed in greater detail in Part III, raw material costs accounted for *** percent of U.S. producers' cost of goods sold in 2020.

U.S. inland transportation costs

All 7 responding U.S. producers¹ and all 12 responding importers reported that they typically arrange transportation to their customers. Most U.S. producers reported that their U.S. inland transportation costs ranged from 5 to 15 percent, while most responding importers reported costs of 3 to 10 percent.

International transportation costs

The Australian, Indonesian, and Portuguese respondents stated that the cost of transportation has increased recently and that they expect it to remain high for some time in the future. Navigator claimed that costs were 5 to 10 times "what they used to be."² This is the result of countries restarting their economies at different times and 2020 cancellation of orders in 2020 for equipment used for transportation.³ This has resulted in a short-term increase in the cost of transportation. In addition, Navigator did not expect that transportation costs would return to previously low levels because of new rules from the International Maritime Organization and the EU that require costly changes in order to limit emissions, and use of renewable fuels, which will reduce competition from long distance importers.⁴ APP stated that freight rates are "prohibitively high" and that it expects the rates to remain thus for "the next

¹ ***.

² Hearing transcript, pp. 177 (Redondo).

³ Hearing transcript, pp. 178 (Redondo).

⁴ Hearing transcript, pp. 178-179 (Redondo).

several years.”⁵ Paper Australia stated that high freight costs were an issue and freight costs from Australia to Southeast Asia are “significantly lower than to the United States.”⁶

Table V-1 and figure V-1 show publicly available spot freight rates from Shanghai to Los Angeles (Asia) and Rotterdam to New York (Europe) to the United States between March 2016 and November 2021.⁷ Many firms pay freight rates that are different from spot rates.⁸ Spot freight rates are more variable than contract freight rates, however, contract rates tend reflect spot freight rates at the time the contracts were negotiated.⁹ Spot freight rates have increased between the beginning of 2020 and November 2021; the rates for freight from Asia have increased more than rates from Europe. Freight rates from Asia began increasing noticeably between May and June 2020, freight rates for both Asia and Europe to the United States began increasing rapidly between April and May of 2021. These spot freight rates peaked in August (Europe) and September (Asia) 2021.¹⁰

⁵ Hearing transcript, p. 183 (Morgan).

⁶ Hearing transcript, p. 185 (Leith).

⁷ Publicly available data were not available for 2015.

⁸ The average carrier rate has increased by less than the spot rate. https://www.joc.com/maritime-news/market-needs-separate-container-rate-extremes-reality_20210129.html; retrieved November 29, 2021.

⁹ “The spot rate is a leading indicator of the direction of contract rates” and spot prices can vary from “hour-to-hour”. Smaller shippers tend to pay spot rates, while larger shippers or those with more predictable flows will use contract rates except when they have extra freight. The spot market is used by “medium to large shippers to cover freight when their routing guide of contract carriers fails to meet the demands for the day, the freight spot market fits specific needs for smaller shippers that do not have enough volume to obtain yearly pricing contracts.” One industry analysis stated that “Companies are far better off to have their freight on contracted rates than spot rates” because of the greater risk in using spot rates. Freight Contract Rates vs Spot Rates – Comprehensive Guide <https://blog.intekfreight-logistics.com/freight-contract-rates-vs-spot-rates-comprehensive-guide>; retrieved November 26, 2021.

¹⁰ “Supply-Chain Problems Show Signs of Easing” with a number of large U.S. chain stores “well stocked for the holidays,” however, backlogs at ports and supply chain problems remain. Domestic posthearing brief, ex. 15.

Table V-1
Freight rates: Spot freight rates by month and route January 2016 to November 2021

Value in dollars per 40 foot container

Year	Month	Shanghai to Los Angeles	Rotterdam to New York City
2016	January	NA	NA
2016	February	NA	NA
2016	March	875	1,397
2016	April	778	1,347
2016	May	NA	NA
2016	June	875	1,364
2016	July	1,293	1,380
2016	August	1,453	1,331
2016	September	NA	NA
2016	October	1,743	1,264
2016	November	1,807	1,264
2016	December	NA	NA
2017	January	1,968	1,281
2017	February	2,000	1,264
2017	March	1,357	1,298
2017	April	NA	NA
2017	May	1,582	1,298
2017	June	1,260	1,248
2017	July	1,228	1,231
2017	August	NA	NA
2017	September	1,486	1,248
2017	October	1,325	1,380
2017	November	NA	NA
2017	December	1,196	1,314
2018	January	1,389	1,529
2018	February	NA	NA
2018	March	1,486	1,612
2018	April	1,196	1,529
2018	May	1,389	1,446
2018	June	NA	NA
2018	July	1,325	1,380
2018	August	2,193	1,496
2018	September	2,386	1,512
2018	October	NA	NA
2018	November	2,707	1,579
2018	December	2,064	1,579

Table continued.

Table V-1
Freight rates: Spot freight rates by month and route January 2016 to November 2021

Value in dollars per 40 foot container, if no value was reported in a month NA is recorded

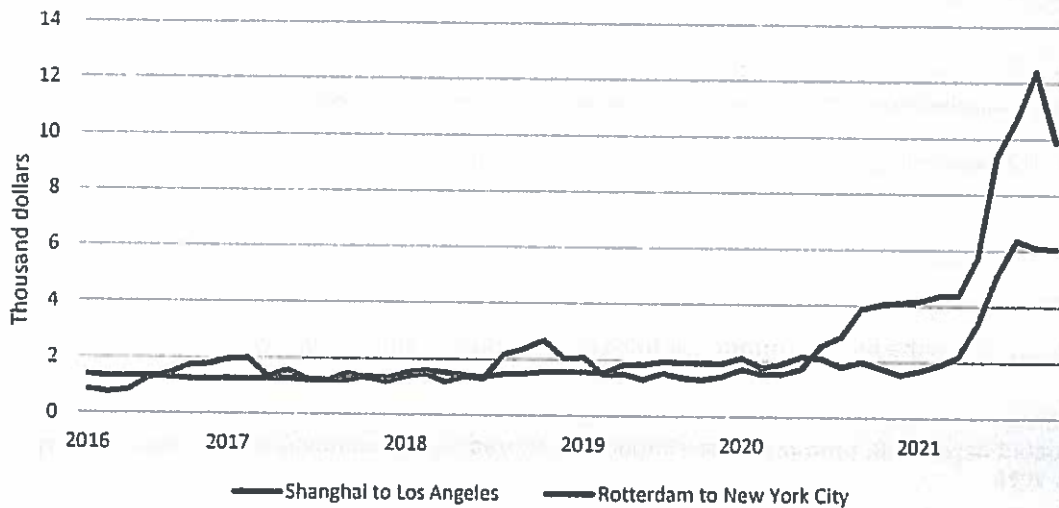
Year	Month	Shanghai to Los Angeles	Rotterdam to New York City
2019	January	NA	NA
2019	February	2,096	1,579
2019	March	1,486	1,545
2019	April	1,518	1,843
2019	May	NA	NA
2019	June	1,325	1,860
2019	July	1,550	1,975
2019	August	NA	NA
2019	September	1,389	1,942
2019	October	1,325	1,926
2019	November	1,453	1,909
2019	December	NA	NA
2020	January	1,711	2,124
2020	February	1,550	1,777
2020	March	1,550	1,909
2020	April	NA	NA
2020	May	1,743	2,174
2020	June	2,579	2,124
2020	July	2,900	1,810
2020	August	NA	NA
2020	September	3,897	2,008
2020	October	4,058	1,777
2020	November	NA	NA
2020	December	4,122	1,545
2021	January	4,186	1,694
2021	February	4,379	1,893
2021	March	NA	NA
2021	April	4,379	2,207
2021	May	5,730	3,331
2021	June	NA	NA
2021	July	9,363	5,050
2021	August	10,714	6,355
2021	September	12,418	6,091
2021	October	NA	NA
2021	November	9,878	6,058

Source: Drewry, World Container Index, <https://infogram.com/world-container-index-1h17493095xl4zi> accessed November 23, 2021.

Note: Data were not available for all months. Data were collected on single days at intervals that were longer than one month apart. Data were typically collected on different days for the different routes, although the data for different routes were collected in the same month.

Figure V-1
International freight rates: Spot freight rates from Shanghai to Los Angeles and from Rotterdam to New York City, March 2016 to November 2021

U.S. dollars per 40 foot container



Source: Drewry, World Container Index, <https://infogram.com/world-container-index-1h17493095xl4zi> accessed November 23, 2021.

Note: Data were not available for all months, nonetheless, data is shown as continuous.

Pricing practices

Pricing methods

Most U.S. producers used multiple ways to set prices (table V-2). Six responding producers reported using contracts, five reported using price lists, and five reported transaction-by-transaction prices. Ten of 14 responding importers reported transaction-by-transaction prices, 4 reported using contracts, 3 reported using price lists, and 2 reported using "other" methods. Other pricing methods included ***.

Table V-2

Uncoated paper: U.S. producers' and importers' reported price setting methods, count

Method	U.S. producers	Importers
Transaction-by-transaction	5	10
Contract	6	4
Set price list	5	3
Other	0	2
Responding firms	7	14

Source: Compiled from data submitted in response to Commission questionnaires.

Note: The response count down may not match the total number of responding firms as each firm was instructed to check all applicable price setting methods employed.

The majority of U.S. producers' sales were on an annual contract basis, while the majority of importers' sales were on a spot basis (table V-3). Among contracts, one-year contracts were the most common for both U.S. producers and importers.

Table V-3

Uncoated paper: U.S. producers' and importers' shares of U.S. commercial shipments, by type of sale, 2020

Share in percent

Method	U.S. producers	Importers
Long-term contracts	16.5	8.1
Annual contracts	53.3	20.1
Short-term contracts	9.4	3.3
Spot sales	20.8	68.5

Source: Compiled from data submitted in response to Commission questionnaires.

Six purchasers reported that they purchase product daily, eight purchase weekly, and three purchase monthly. Most (16 of 18) purchasers contact one to five suppliers before making a purchase.

Sales terms and discounts

U.S. producers and importers typically quote prices on a delivered basis. Most responding producers (6 of 7) offer either quantity or total volume discounts or both, one reported no discount policy, and two reported other discounts (in addition to quantity and volume discounts). One of these producers (***) reported discounts to meet competition. The other (***) reported that it "evaluates business based on Net Selling Price. Net Selling Price equals Invoice Price less all rebates and payment terms. ***.

***. Most responding importers (9 of 14) reported no discount policy, three offered both quantity and total volume discounts, one offered only quantity discounts, and two reported other discounts (payment terms).¹¹

Price leadership

Thirteen purchasers reported one or more price leaders. Domtar and International Paper were each reported to be price leaders by nine purchasers, while Boise and Navigator were each reported to be price leaders by two firms. No other firm was listed as a price leader by more than one purchaser.

Price data

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and delivered¹² value of the following uncoated paper product¹³ shipped to unrelated U.S. customers from January 2015 to June 2021.

Product 1.-- Uncoated paper, weighing 20 lb. (75 gsm), with dimensions of 8 1/2 x 11 inches, and with GE brightness greater than 90 white and plain (i.e., not altered through processes such as surface-decorating, printing, embossing, perforating, punching, or watermarking)

Eight U.S. producers and 9 importers provided usable pricing data for sales of the requested product, although not all firms reported pricing for the product for all quarters.¹⁴ Pricing data reported by these firms accounted for approximately 79.8 percent of U.S. producers' shipments of uncoated paper in 2020. Importers' reported price data accounted for

¹¹ Only one of the importers reported what other discounts were.

¹² The Commission proposed that the price data be collected on a delivered basis, as it had been collected in the original investigations.

¹³ In the original investigations, in the original investigation, price data were collected for letter size, legal size, and 23 x 35 inch size in the original investigations. Letter sized paper represented approximately *** percent of the price data collected in the final investigation. Imports from all subject countries reported the majority of their sales were of product 1. Commission confidential final views, p. 33. As a result, in these investigations, the Commission focused on the price data for letter size paper.

¹⁴ Per-unit pricing data are calculated from total quantity and total value data provided by U.S. producers and importers. The precision and variation of these figures may be affected by rounding, limited quantities, and producer or importer estimates.

*** percent of the U.S. shipments of subject imports from Brazil and *** percent of the U.S. shipments of subject imports from Portugal in 2020.¹⁵ Thus, imports from Brazil and Portugal continued to be sold in the U.S. market in spite of the orders. There were no commercial shipments of imports from Australia, China, or Indonesia in 2020.¹⁶

Price data for product 1 are presented in table V-4 and figure V-2.

The data reported for product 1 represent the majority of apparent U.S. consumption of uncoated paper throughout the period of review.¹⁷ The quantity of product 1 (U.S. and imports) reported declined relatively steadily from the first quarter of 2015 to the first quarter of 2020, reflecting the overall decline in demand reported for uncoated paper during that period. In contrast, the quantity of product 1 reported declined sharply (*** percent) between the first and second quarter of 2020 (when the COVID-19 pandemic fully hit the United States).¹⁸ The quantity of product 1 reported recovered somewhat from the second quarter of 2020 to the third quarter of 2020 (increasing *** percent). Changes in the quantities of product 1 sold in the third quarter of 2020 and the second quarter of 2021 were within similar to the quarter to quarter product 1 quantity changes before 2020.

¹⁵ Pricing coverage is based on U.S. shipments reported in questionnaires.

¹⁶ Price data share of commercial U.S. shipments of subject product by country during January 2015 to June 2021 for Australia represented *** percent, for China *** percent, and for Indonesia *** percent. ***.

¹⁷ The price data for product 1 falls from *** percent of apparent U.S. consumption in 2015 to *** percent in 2020.

¹⁸ The WHO declared COVID 19 a pandemic on March 11, 2020. "WHO Director-General's opening remarks at the media briefing on COVID-19 11 March 2020". <https://www.who.int/director-general/speeches/detail/who-director-general-s-opening-remarks-at-the-media-briefing-on-covid-19---11-march-2020>, retrieved October 13, 2021.

11/10 9.11.11
PAGE NO

Table V-4

Uncoated paper: Weighted-average delivered prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	US price	US quantity	Australia Price	Australia quantity	Australia margin	Brazil price	Brazil quantity	Brazil margin
2015 Q1	***	***	***	***	***	***	***	***
2015 Q2	***	***	***	***	***	***	***	***
2015 Q3	***	***	***	***	***	***	***	***
2015 Q4	***	***	***	***	***	***	***	***
2016 Q1	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***
2019 Q1	***	***	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***

Table Continued

Table V-4 Continued

Uncoated paper: Weighted-average delivered prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	China Price	China quantity	China margin	Indonesia price	Indonesia quantity	Indonesia margin	Portugal price	Portugal quantity	Portugal margin
2015 Q1	***	***	***	***	***	***	***	***	***
2015 Q2	***	***	***	***	***	***	***	***	***
2015 Q3	***	***	***	***	***	***	***	***	***
2015 Q4	***	***	***	***	***	***	***	***	***
2016 Q1	***	***	***	***	***	***	***	***	***
2016 Q2	***	***	***	***	***	***	***	***	***
2016 Q3	***	***	***	***	***	***	***	***	***
2016 Q4	***	***	***	***	***	***	***	***	***
2017 Q1	***	***	***	***	***	***	***	***	***
2017 Q2	***	***	***	***	***	***	***	***	***
2017 Q3	***	***	***	***	***	***	***	***	***
2017 Q4	***	***	***	***	***	***	***	***	***
2018 Q1	***	***	***	***	***	***	***	***	***
2018 Q2	***	***	***	***	***	***	***	***	***
2018 Q3	***	***	***	***	***	***	***	***	***
2018 Q4	***	***	***	***	***	***	***	***	***
2019 Q1	***	***	***	***	***	***	***	***	***
2019 Q2	***	***	***	***	***	***	***	***	***
2019 Q3	***	***	***	***	***	***	***	***	***
2019 Q4	***	***	***	***	***	***	***	***	***
2020 Q1	***	***	***	***	***	***	***	***	***
2020 Q2	***	***	***	***	***	***	***	***	***
2020 Q3	***	***	***	***	***	***	***	***	***
2020 Q4	***	***	***	***	***	***	***	***	***
2021 Q1	***	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***	***

Table Continued

06 1299

PAGE NO

Table V-4 Continued

Uncoated paper: Weighted-average delivered prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	US price	US quantity	Subject price	Subject quantity	Subject margin
2015 Q1	***	***	***	***	***
2015 Q2	***	***	***	***	***
2015 Q3	***	***	***	***	***
2015 Q4	***	***	***	***	***
2016 Q1	***	***	***	***	***
2016 Q2	***	***	***	***	***
2016 Q3	***	***	***	***	***
2016 Q4	***	***	***	***	***
2017 Q1	***	***	***	***	***
2017 Q2	***	***	***	***	***
2017 Q3	***	***	***	***	***
2017 Q4	***	***	***	***	***
2018 Q1	***	***	***	***	***
2018 Q2	***	***	***	***	***
2018 Q3	***	***	***	***	***
2018 Q4	***	***	***	***	***
2019 Q1	***	***	***	***	***
2019 Q2	***	***	***	***	***
2019 Q3	***	***	***	***	***
2019 Q4	***	***	***	***	***
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 1: Uncoated paper, weighing 20 lb. (75 gsm), with dimensions of 8 1/2 x 11 inches, and with GE brightness greater than 90 white and plain (i.e., not altered through processes such as surface-decorating, printing, embossing, perforating, punching, or watermarking).

PAGE NO

Figure V-2

Uncoated paper: Weighted-average prices and quantities of domestic and imported product 1, by quarter

		Price of product 1					
		Q1	Q2	Q3	Q4	Q1	Q2
		*	*	*	*	*	*
		Volume of product 1					
		*	*	*	*	*	*

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 1: Uncoated paper, weighing 20 lb. (75 gsm), with dimensions of 8 1/2 x 11 inches, and with GE brightness greater than 90 white and plain (i.e., not altered through processes such as surface-decorating, printing, embossing, perforating, punching, or watermarking).

Price trends

The price of U.S.-produced product 1 increased overall from January 2015 to June 2021; in contrast, the price of the subject imports tended to decrease overall. Table V-4 summarizes the price trends, by country. As shown in the table, domestic prices increased by *** percent during January 2015 to June 2021, while import price decreases ranged from *** percent. Indexed prices tended to decrease from the first quarter of 2015, with the average import price reaching a low in the first quarter of 2017 and the average U.S. price reaching its minimum in the third quarter of 2017 through the first quarter of 2018 (tables V-5 and V-6 and figure V-3). The price of imports rose above its original value in the first quarter of 2018, while the price of U.S. product rose above its original value in the third quarter of 2018.¹⁹ Import prices peaked in the first quarter of 2019 and then began to decline, while U.S. prices peaked in the first quarter of 2019 and began declining in the fourth quarter of 2019. Both import and U.S. prices began to increase in the first quarter of 2021.

¹⁹ During the POR, raw material costs increased the most (\$*** per short ton) between 2017 and 2018. See table III-13. This increase in costs and the lag in price changes caused by annual contracts may explain the increase in U.S. prices in 2018 to 2019.

Table V-5

Uncoated paper: Number of quarters containing observations, low price, high price, price at first quarter, price at last quarter, and change in price, by source

Volume in short tons, price in dollars per ton

Source	Number of quarters	Volume of shipments	Low price	High price	First quarter price	Last quarter price	Percent change in price over period
United States	26	***	***	***	***	***	***
Australia	7	***	***	***	***	***	***
Brazil	26	***	***	***	***	***	***
China	3	***	***	***	***	***	***
Indonesia	8	***	***	***	***	***	***
Portugal	26	***	***	***	***	***	***
Subject	26	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Percent change column is percentage change from the first quarter 2015 to the second quarter 2021. When these are available. Indonesian prices increased *** percent from the first quarter of 2015 to the third quarter of 2018. Import prices from Australia and China were only available at the beginning of the period.

Table V-6
Uncoated paper: Indexed U.S. producer and subject U.S. importers prices January 2015 through June 2021

First quarter 2015 = 100

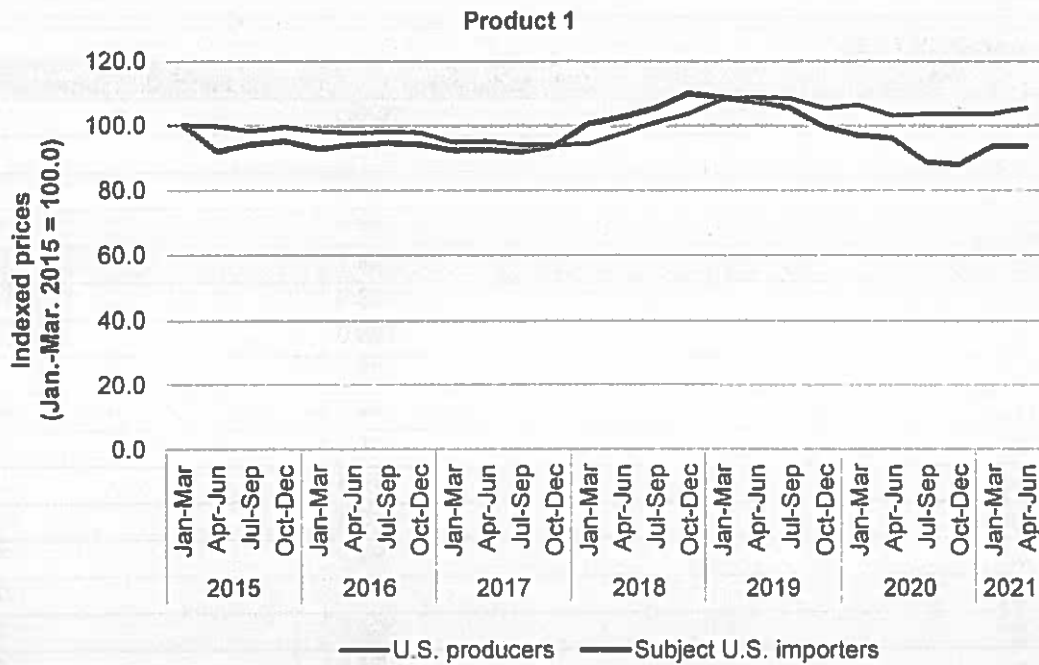
Period	U.S. producers	Subject U.S. importers
2015 Q1	100.0	100.0
2015 Q2	99.7	91.9
2015 Q3	98.2	94.1
2015 Q4	99.4	95.1
2016 Q1	98.1	92.7
2016 Q2	97.6	93.9
2016 Q3	98.0	94.6
2016 Q4	97.7	94.1
2017 Q1	94.7	92.1
2017 Q2	95.0	92.3
2017 Q3	94.0	91.8
2017 Q4	93.8	93.6
2018 Q1	94.2	100.4
2018 Q2	97.4	102.5
2018 Q3	100.8	105.2
2018 Q4	103.5	109.8
2019 Q1	108.0	108.6
2019 Q2	108.5	107.3
2019 Q3	108.3	105.3
2019 Q4	105.1	99.4
2020 Q1	106.2	96.7
2020 Q2	103.1	96.0
2020 Q3	103.4	88.7
2020 Q4	103.5	87.9
2021 Q1	103.5	93.4
2021 Q2	105.3	93.4

Source: Compiled from data submitted in response to Commission questionnaires.

PAGE NO

02 30 44

Figure V-3
Uncoated paper: Indexed U.S. producer and subject U.S. importers prices of product 1 January 2015 through June 2021



Source: Compiled from data submitted in response to Commission questionnaires.

PAGE NO

Price comparisons²⁰

As shown in table V-7, prices for uncoated paper imported from subject countries were below those for U.S.-produced product for Australia in all 7 instances (margins of underselling ranged from *** percent); Brazil in 18 of 26 instances (margins of underselling ranged from *** percent); China in 1 of 3 instances (the margin of underselling was *** percent); Indonesia in 2 of 20 instances (margins of underselling ranged from *** percent); and Portugal in 5 of 26 instances (margins of underselling ranged from *** percent). In the remaining 49 instances, prices for uncoated paper from subject countries were higher than prices for domestic product; for Australia, there were no instances of overselling; for Brazil there were 8 instances (margins of overselling were between *** percent); for China there were 2 instances (margins of overselling were between *** percent); for Indonesia there were 18 instances (margins of overselling were between *** percent); and for Portugal there were 21 instances (margins of overselling were between *** percent).

²⁰ In the original investigations, subject imports from Australia were priced lower than domestic product in 14 of 15 comparisons, with underselling margins ranging from *** to *** percent; subject imports from Brazil were priced lower than domestic product in 7 of 30 comparisons, with underselling margins ranging from *** to *** percent; subject imports from China were priced lower than domestic product in 20 of 21 comparisons, with underselling margins ranging from *** to *** percent; subject imports from Indonesia were priced lower than domestic product in 41 of 41 comparisons, with underselling margins ranging from *** to *** percent; and subject imports from Portugal were priced lower than domestic product in 2 of 30 comparisons, with underselling margins ranging from *** to *** percent. Imported product 1 prices were lower than U.S. product 1 prices for imports from Australia in 14 of 15 instances, for imports from Brazil in 6 of 15 instances, for imports from China in 14 of 15 instances, for imports from Indonesia in 15 of 15 instances, and for imports from Portugal in 1 of 15 instances. Investigation Nos. 701-TA-528-529 and 731-TA-1264-1268 (Final): Uncoated Paper from Australia, Brazil, China, Indonesia, and Portugal, Confidential Report, INV-OO-004, January 28, 2016, table V-9 and p. V-25.

Table V-7

Uncoated paper: Instances of underselling/overselling, quantity, the range and average of margins, by country

Quantity in short tons; margin in percent

Source	Under/over selling	Number of quarters	Quantity	Average margin	Min margin	Max margin
Australia	Underselling	7	***	***	***	***
Brazil	Underselling	18	***	***	***	***
China	Underselling	1	***	***	***	***
Indonesia	Underselling	6	***	***	***	***
Portugal	Underselling	5	***	***	***	***
Total	Underselling	37	438,151	5.3	0.5	20.4
Australia	Overselling	0	***	***	***	***
Brazil	Overselling	8	***	***	***	***
China	Overselling	2	***	***	***	***
Indonesia	Overselling	2	***	***	***	***
Portugal	Overselling	21	***	***	***	***
Total	Overselling	33	487,454	(6.8)	(0.5)	(17.2)

Source: Compiled from data submitted in response to Commission questionnaires.

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Table V-8 shows the underselling and overselling by year. The share of instances in which imports undersold U.S. product 1 was highest in the first half of 2021 (underselling in all four instances), followed by 2020 (underselling in 7 of 8 instances). The average margins of underselling were highest in 2020. Import's share of instances in which imports oversold U.S. product 1 was highest in 2018 (overselling in all 9 instances) followed by 2019 (overselling in 6 of 8 instances), and margins of overselling tended to be large in 2017 and 2018.

Table V-8

Uncoated paper: Instances of underselling/overselling, quantity, the range and average of margins, by year

Quantity in short tons; margin in percent

Source	Under/over selling	Number of quarters	Quantity	Average margin	Min margin	Max margin
2015	Underselling	***	***	***	***	***
2016	Underselling	***	***	***	***	***
2017	Underselling	***	***	***	***	***
2018	Underselling	***	***	***	***	***
2019	Underselling	***	***	***	***	***
2020	Underselling	***	***	***	***	***
2021	Underselling	***	***	***	***	***
Total	Underselling	37	438,151	5.3	0.5	20.4
2015	Overselling	***	***	***	***	***
2016	Overselling	***	***	***	***	***
2017	Overselling	***	***	***	***	***
2018	Overselling	***	***	***	***	***
2019	Overselling	***	***	***	***	***
2020	Overselling	***	***	***	***	***
2021	Overselling	***	***	***	***	***
Total	Overselling	33	487,454	(6.8)	(0.5)	(17.2)

Source: Compiled from data submitted in response to Commission questionnaires.

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

3



100 200

APPENDIX A
FEDERAL REGISTER NOTICES

[Faint, illegible text covering the majority of the page, possibly bleed-through from the reverse side.]



100 10000

The Commission makes available notices relevant to its investigations and reviews on its website, www.usitc.gov. In addition, the following tabulation presents, in chronological order, *Federal Register* notices issued by the Commission and Commerce during the current proceeding.

Citation	Title	Link
81 FR 11174, March 3, 2016	<i>Certain Uncoated Paper From Australia, Brazil, Indonesia, the People's Republic of China, and Portugal: Amended Final Affirmative Antidumping Determinations for Brazil and Indonesia and Antidumping Duty Orders</i>	https://www.govinfo.gov/content/pkg/FR-2016-03-03/pdf/2016-04699.pdf
81 FR 11187, March 3, 2016	<i>Certain Uncoated Paper From Indonesia and the People's Republic of China: Amended Final Affirmative Countervailing Duty Determination and Countervailing Duty Order (Indonesia) and Countervailing Duty Order (People's Republic of China)</i>	https://www.govinfo.gov/content/pkg/FR-2016-03-03/pdf/2016-04717.pdf
86 FR 7709, February 1, 2021	<i>Initiation of Five-Year (Sunset) Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2021-02-01/pdf/2021-02078.pdf
86 FR 7734, February 1, 2021	<i>Certain Uncoated Paper From Australia, Brazil, China, Indonesia, and Portugal; Institution of Five-Year Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2021-02-01/pdf/2021-02087.pdf
86 FR 27650, May 21, 2021	<i>Certain Uncoated Paper From Australia, Brazil, China, Indonesia, and Portugal; Notice of Commission Determination To Conduct Full Five-Year Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2021-05-21/pdf/2021-10766.pdf
86 FR 29243, June 1, 2021	<i>Certain Uncoated Paper From Indonesia: Final Results of the Expedited First Five-Year Sunset Review of the Countervailing Duty Order</i>	https://www.govinfo.gov/content/pkg/FR-2021-06-01/pdf/2021-11461.pdf

Citation	Title	Link
86 FR 29248, June 1, 2021	<i>Uncoated Paper From Australia, Brazil, the People's Republic of China, Indonesia, and Portugal: Final Results of the Expedited First Sunset Reviews of the Antidumping Duty Orders</i>	https://www.govinfo.gov/content/pkg/FR-2021-06-01/pdf/2021-11460.pdf
86 FR 30260, June 7, 2021	<i>Certain Uncoated Paper From the People's Republic of China: Final Results of the Expedited Five-Year Sunset Review of the Countervailing Duty Order</i>	https://www.govinfo.gov/content/pkg/FR-2021-06-07/pdf/2021-11854.pdf
86 FR 39057, July 23, 2021	<i>Uncoated Paper From Australia, Brazil, China, Indonesia, and Portugal; Scheduling of Full Five-Year Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2021-07-23/pdf/2021-15670.pdf

Note: A summary of the Commission's votes concerning adequacy and the conduct of a full or expedited review can be found at

[Uncoated Paper from Australia, Brazil, China, Indonesia, and Portugal | USITC](#)

The Commission's explanation of its determinations can be found at:

[USTIC Five-Year \(Sunset\) Reviews: Case Profile List](#)

APPENDIX B
LIST OF HEARING WITNESSES

B-1

PAGE NO

[Faint, illegible text covering the majority of the page, possibly bleed-through from the reverse side.]

ATTENTION

BY TELEPHONE

[Faint, illegible text at the bottom of the page, possibly bleed-through from the reverse side.]

CALENDAR OF PUBLIC HEARING

Those listed below appeared in the United States International Trade Commission's hearing via videoconference:

Subject: Uncoated Paper from Australia, Brazil, China, Indonesia, and Portugal

Inv. Nos.: 701-TA-528-529 and 731-TA-1264-1268 (Review)

Date and Time: November 18, 2021 - 9:30 a.m.

OPENING REMARKS:

In Support of Continuation (**Stephen J. Orava**, King & Spalding LLP)
In Opposition to Continuation (**Jonathan M. Zielinski**, Cassidy Levy Kent (USA) LLP)

In Support of the Continuation of Antidumping and Countervailing Duty Orders:

King & Spalding LLP
Schagrin Associates
Washington, DC
on behalf of

Domtar Corporation
Finch Paper LLC
North Pacific Paper Company
Packaging Corporation of America
United Steel, Paper and Forestry, Rubber, Manufacturing,
Energy, Allied Industrial and Service Workers
International Union ("USW")

Robert Melton, Senior Vice President, Commercial, Domtar Corporation

Gregory Strand, Vice President, Office Supply, Domtar Corporation

Alex Rotolo, Vice President, Chief Financial Officer, Finch Paper LLC

Craig Anneberg, Chief Executive Officer, North Pacific Paper Company

Tom Crowley, Vice President, Sales and Marketing, North Pacific Paper Company

**In Support of the Continuation of
Antidumping and Countervailing Duty Orders (continued):**

Paul LeBlanc, Vice President, BOISE Paper, a division of Packaging Corporation of America

Leeann Foster, International Vice President, USW

Bonnie B. Byers, Consultant, King & Spalding LLP

Travis Pope, Project Manager, Capital Trade, Inc.

Stephen J. Orava)
Stephen P. Vaughn)
Clinton R. Long)
) – OF COUNSEL
Barbara Medrado)
Elizabeth Drake)
Nicholas J. Birch)

**In Opposition to the Continuation of
Antidumping and Countervailing Duty Orders:**

Cassidy Levy Kent (USA) LLP
Washington, DC
on behalf of

The Navigator Company, S.A.
Navigator North America, Inc.
(collectively "Navigator")

António Redondo, Chief Executive Officer, Navigator

Mike Dutt, Manager, Navigator

Jonathan M. Zielinski)
Mary Jane Alves) – OF COUNSEL
Myles S. Getlan)

**In Opposition to the Continuation of
Antidumping and Countervailing Duty Orders (continued):**

Sidley Austin LLP
Washington, DC
on behalf of

Paper Australia Pty Ltd ("Australian Paper")
Paper Products Marketing (USA) Inc. ("PPM-USA")

Steven Leith, President, PPM-USA

Shawn M. Higgins) – OF COUNSEL

Trade Law Defense PLLC
Alexandria, VA
on behalf of

PT. Pindo Deli Pulp and Paper Mills
PT. Pabrik Kertas Tjiwi Kimia
Tbk
PT Indah Kiat Tbk
(collectively "APP")

Arvind Gupta, Head Task Force Remedies for the APP Group

Frank Morgan) – OF COUNSEL

REBUTTAL/CLOSING REMARKS:

In Support of Continuation (**Stephen P. Vaughn, King & Spalding LLP and Elizabeth Drake, Schagrin Associates**)

In Opposition to Continuation (**Frank Morgan, Trade Law Defense PLLC and Mary Jane Alves, Cassidy Levy Kent (USA) LLP**)

-END-

Faint header text at the top of the page, possibly including a title or reference number.

First main section of faint text, appearing to be a list or series of entries.

Second main section of faint text, continuing the list or entries.

Third main section of faint text, possibly a summary or conclusion.

Fourth main section of faint text, located in the lower middle part of the page.

Bottom section of faint text, possibly a footer or additional notes.

APPENDIX C
SUMMARY DATA

[Faint, illegible text covering the majority of the page, possibly bleed-through from the reverse side.]

SECRET

SECRET

Table C-1

Uncoated paper: Summary data concerning the U.S. market, 2015-20, January to June 2020, and January to June 2021

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent—exceptions noted

	Reported data							
	Calendar year						Jan-Jun	
	2015	2016	2017	2018	2019	2020	2020	2021
U.S. consumption quantity:								
Amount.....	4,028,225	3,782,210	3,680,182	3,586,595	3,376,899	2,486,623	1,258,762	1,270,576
Producers' share (fn1).....	84.1	88.5	88.5	89.0	87.4	85.9	88.4	83.0
Importers' share (fn1):								
Australia.....
Brazil.....
China.....	0.9	0.0	0.0	0.0	0.1	0.1	0.1	0.0
Indonesia.....	3.7	1.2	0.4	0.3	0.6	0.0	0.0	—
Portugal.....
Subject sources.....
Nonsubject sources.....
All import sources.....	15.9	11.5	11.5	11.0	12.6	14.1	13.6	17.0
U.S. consumption value:								
Amount.....	3,794,668	3,555,640	3,419,512	3,474,752	3,505,157	2,531,199	1,282,844	1,288,411
Producers' share (fn1).....	84.7	88.8	88.9	89.8	86.1	87.0	87.5	84.8
Importers' share (fn1):								
Australia.....
Brazil.....
China.....	0.8	0.0	0.0	0.0	0.1	0.1	0.1	0.0
Indonesia.....	3.4	1.2	0.4	0.3	0.6	0.0	0.0	—
Portugal.....
Subject sources.....
Nonsubject sources.....
All import sources.....	15.3	11.2	11.1	10.4	11.9	13.0	12.5	15.2
U.S. imports from:								
Australia:								
Quantity.....
Value.....
Unit value.....
Ending inventory quantity.....
Brazil:								
Quantity.....
Value.....
Unit value.....
Ending inventory quantity.....
China:								
Quantity.....	36,241	732	604	461	2,462	1,390	1,138	58
Value.....	29,394	901	825	627	2,868	2,008	1,543	211
Unit value.....	\$811	\$1,232	\$1,365	\$1,359	\$1,165	\$1,445	\$1,358	\$3,603
Ending inventory quantity.....
Indonesia:								
Quantity.....	148,520	43,339	15,317	12,280	21,749	189	189	—
Value.....	129,380	40,944	13,453	11,657	19,449	144	144	—
Unit value.....	\$871	\$945	\$878	\$949	\$884	\$765	\$765	—
Ending inventory quantity.....
Portugal:								
Quantity.....
Value.....
Unit value.....
Ending inventory quantity.....

Table continued.

Table C-1 continued

Uncoated paper: Summary data concerning the U.S. market, 2015-20, January to June 2020, and January to June 2021

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent—exceptions noted

	Period changes						
	2015-20	2015-18	Comparison years		2018-19	2019-20	Jan-Jun 2020-21
			2016-17	2017-18			
U.S. consumption quantity:							
Amount.....	▼(38.0)	▼(6.6)	▼(2.2)	▼(2.5)	▼(5.8)	▼(26.1)	▲0.9
Producers' share (fn1).....	▲1.7	▲4.4	▲0.1	▲0.5	▼(1.8)	▼(1.5)	▼(3.4)
Importers' share (fn1):							
Australia.....	▼***	▼***	***	***	***	***	***
Brazil.....	▼***	▼***	▼***	▼***	▲***	▲***	▲***
China.....	▼(0.8)	▼(0.9)	▼(0.0)	▼(0.0)	▲0.1	▼(0.0)	▼(0.1)
Indonesia.....	▼(3.7)	▼(2.5)	▼(0.7)	▼(0.1)	▲0.3	▼(0.5)	▼(0.0)
Portugal.....	▼***	▼***	▼***	▲***	▼***	▲***	▲***
Subject sources.....	▼***	▼***	▼***	▼***	▲***	▼***	▲***
Nonsubject sources.....	▲***	▲***	▲***	▲***	▲***	▲***	▲***
All import sources.....	▼(1.7)	▼(4.4)	▼(0.1)	▼(0.5)	▲1.8	▲1.5	▲3.4
U.S. consumption value:							
Amount.....	▼(33.3)	▼(6.3)	▼(3.8)	▲1.8	▲0.9	▼(27.8)	▼(1.1)
Producers' share (fn1).....	▲2.3	▲4.1	▲0.1	▲0.8	▼(1.5)	▼(1.1)	▼(2.7)
Importers' share (fn1):							
Australia.....	▼***	▼***	***	***	***	***	***
Brazil.....	▼***	▼***	▼***	▼***	▲***	▼***	▲***
China.....	▼(0.7)	▼(0.7)	▼(0.0)	▼(0.0)	▲0.1	▼(0.0)	▼(0.1)
Indonesia.....	▼(3.4)	▼(2.3)	▼(0.8)	▼(0.1)	▲0.2	▼(0.5)	▼(0.0)
Portugal.....	▼***	▼***	▼***	▲***	▼***	▲***	▲***
Subject sources.....	▼***	▼***	▼***	▼***	▲***	▼***	▲***
Nonsubject sources.....	▲***	▲***	▲***	▲***	▲***	▲***	▲***
All import sources.....	▼(2.3)	▼(4.1)	▼(0.1)	▼(0.6)	▲1.5	▲1.1	▲2.7
U.S. imports from:							
Australia:							
Quantity.....	▼***	▼***	***	***	***	***	***
Value.....	▼***	▼***	***	***	***	***	***
Unit value.....	▼***	▼***	***	***	***	***	***
Ending inventory quantity.....	▼***	▼***	***	***	***	***	***
Brazil:							
Quantity.....	▼***	▼***	▼***	▼***	▲***	▼***	▲***
Value.....	▼***	▼***	▼***	▼***	▲***	▼***	▲***
Unit value.....	▼***	▼***	▲***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	▼***	▲***	▼***	▲***	▲***	▲***	▼***
China:							
Quantity.....	▼(98.2)	▼(98.0)	▼(17.4)	▼(23.7)	▲433.6	▼(43.6)	▼(94.9)
Value.....	▼(93.2)	▼(98.9)	▼(8.4)	▼(24.0)	▲357.4	▼(30.0)	▼(88.3)
Unit value.....	▲78.2	▲51.9	▲10.9	▼(0.5)	▼(14.3)	▲24.1	▲165.8
Ending inventory quantity.....	▼***	▼***	▼***	▼***	***	▼***	***
Indonesia:							
Quantity.....	▼(99.9)	▼(70.8)	▼(84.7)	▼(19.8)	▲77.1	▼(99.1)	▼(100.0)
Value.....	▼(98.9)	▼(68.4)	▼(67.1)	▼(13.4)	▲66.9	▼(99.3)	▼(100.0)
Unit value.....	▼(12.2)	▲8.5	▼(7.0)	▲8.1	▼(5.8)	▼(14.5)	▼(100.0)
Ending inventory quantity.....	▼***	▼***	***	***	***	***	***
Portugal:							
Quantity.....	▼***	▼***	▼***	▲***	▼***	▼***	▲***
Value.....	▼***	▼***	▼***	▲***	▼***	▼***	▲***
Unit value.....	▼***	▲***	▲***	▼***	▲***	▼***	▼***
Ending inventory quantity.....	▼***	▲***	▼***	▼***	▼***	▲***	▼***

Table continued.

Table C-1 continued

Uncoated paper: Summary data concerning the U.S. market, 2015-20, January to June 2020, and January to June 2021

Quantity=short tons; Value=1,000 dollars. Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent—exceptions noted

	Reported data							
	Calendar year							Jan-Jun
	2015	2016	2017	2018	2019	2020	2020	2021
U.S. imports from:								
Subject sources:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***
Nonsubject sources:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***
All import sources:								
Quantity.....	639,430	433,469	421,441	393,654	425,298	352,848	171,522	215,852
Value.....	581,031	397,245	378,447	362,071	417,544	329,808	180,354	192,385
Unit value.....	\$909	\$916	\$898	\$920	\$982	\$935	\$935	\$891
Ending inventory quantity.....	***	***	***	***	***	***	***	***
U.S. producers':								
Average sheeting capacity quantity.....	4,347,405	4,314,835	4,293,756	4,259,054	3,972,718	3,476,598	1,850,914	1,343,380
Production quantity.....	3,642,012	3,531,714	3,497,671	3,426,136	3,198,696	2,208,112	1,119,265	1,039,049
Capacity utilization (fn1).....	83.8	81.9	81.5	80.4	80.5	63.5	60.5	77.3
U.S. shipments:								
Quantity.....	3,368,795	3,328,741	3,258,741	3,192,941	2,951,601	2,143,775	1,087,240	1,054,724
Value.....	3,213,635	3,156,385	3,041,065	3,112,681	3,087,813	2,201,391	1,122,490	1,076,026
Unit value.....	\$948	\$949	\$933	\$975	\$1,046	\$1,027	\$1,032	\$1,020
Export shipments:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Ending inventory quantity.....	347,848	335,251	346,627	334,573	391,314	288,457	349,974	234,633
Inventories/total shipments (fn1).....	***	***	***	***	***	***	***	***
Production workers.....	5,844	5,836	5,489	5,816	5,883	4,201	4,488	3,242
Hours worked (1,000s).....	12,461	12,406	12,111	12,647	12,063	9,413	5,166	3,950
Wages paid (\$1,000).....	485,504	490,969	461,565	495,918	497,912	388,680	214,149	164,109
Hourly wages (dollars per hour).....	\$38.96	\$39.58	\$38.11	\$39.21	\$41.28	\$41.29	\$41.45	\$41.55
Productivity (short tons per 1,000 hours).....	292	285	289	271	265	235	217	263
Unit labor costs.....	\$133	\$139	\$132	\$145	\$156	\$176	\$191	\$158

Table continued.

Table C-1 continued

Uncoated paper: Summary data concerning the U.S. market, 2015-20, January to June 2020, and January to June 2021
 Quantity=short tons, Value=1,000 dollars, Unit values, unit labor costs, and unit expenses=dollars per short ton, Period changes=percent—exceptions noted

	Period changes						
	Comparison years						Jan-Jun 2020-21
	2015-20	2015-16	2016-17	2017-18	2018-19	2019-20	
U.S. imports from:							
Subject sources:							
Quantity.....	▼***	▼***	▼***	▼***	▲***	▼***	▲***
Value.....	▼***	▼***	▼***	▼***	▲***	▼***	▲***
Unit value.....	▼***	▲***	▼***	▼***	▲***	▼***	▼***
Ending inventory quantity.....	▼***	▼***	▼***	▼***	▼***	▲***	▼***
Nonsubject sources:							
Quantity.....	▲***	▲***	▲***	▲***	▲***	▼***	▲***
Value.....	▲***	▲***	▲***	▲***	▲***	▼***	▲***
Unit value.....	▼***	▼***	▼***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	▲***	▼***	▲***	▼***	▲***	▲***	▼***
All import sources:							
Quantity.....	▼(44.8)	▼(32.2)	▼(2.6)	▼(6.6)	▲8.0	▼(17.0)	▲25.8
Value.....	▼(43.2)	▼(31.6)	▼(4.7)	▼(4.3)	▲15.3	▼(21.0)	▲20.0
Unit value.....	▲2.9	▲0.9	▼(2.0)	▲2.4	▲6.7	▼(4.8)	▼(4.7)
Ending inventory quantity.....	▼***	▼***	▼***	▼***	▲***	▲***	▼***
U.S. producers:							
Average sheeting capacity quantity.....	▼(20.0)	▼(0.7)	▼(0.5)	▼(0.8)	▼(6.7)	▼(12.5)	▼(27.4)
Production quantity.....	▼(39.4)	▼(3.0)	▼(1.0)	▼(2.0)	▼(6.6)	▼(31.0)	▼(7.2)
Sheeting capacity utilization (fn1).....	▼(20.3)	▼(1.9)	▼(0.4)	▼(1.0)	▲0.1	▼(17.0)	▲16.9
U.S. shipments:							
Quantity.....	▼(36.7)	▼(1.8)	▼(2.1)	▼(2.0)	▼(7.6)	▼(27.4)	▼(3.0)
Value.....	▼(31.5)	▼(1.7)	▼(3.7)	▲2.4	▼(0.8)	▼(28.7)	▼(4.1)
Unit value.....	▲8.3	▲0.1	▼(1.8)	▲4.5	▲7.3	▼(1.8)	▼(1.2)
Export shipments:							
Quantity.....	▼***	▼***	▲***	▲***	▼***	▼***	▼***
Value.....	▼***	▼***	▲***	▲***	▼***	▼***	▼***
Unit value.....	▲***	▲***	▼***	▲***	▲***	▼***	▲***
Ending inventory quantity.....	▼(14.2)	▼(3.5)	▲3.4	▼(3.5)	▲17.0	▼(23.7)	▼(33.0)
Inventories/total shipments (fn1).....	▲***	▼***	▲***	▼***	▲***	▲***	▼***
Production workers.....	▼(28.1)	▼(0.1)	▼(5.9)	▲6.0	▼(2.3)	▼(28.1)	▼(27.8)
Hours worked (1,000s).....	▼(24.5)	▼(0.4)	▼(2.4)	▲4.4	▼(4.6)	▼(22.0)	▼(23.5)
Wages paid (\$1,000).....	▼(19.9)	▲1.1	▼(6.0)	▲7.4	▲0.4	▼(21.9)	▼(23.4)
Hourly wages (dollars per hour).....	▲6.0	▲1.6	▼(3.7)	▲2.9	▲5.3	▲0.9	▲0.2
Productivity (short tons per 1,000 hours).....	▼(19.7)	▼(2.6)	▲1.4	▼(6.2)	▼(2.1)	▼(11.5)	▲21.4
Unit labor costs.....	▲32.0	▲4.3	▼(5.1)	▲9.7	▲7.5	▲13.1	▼(17.5)

Table continued.

Table C-1 continued

Uncoated paper: Summary data concerning the U.S. market, 2015-20, January to June 2020, and January to June 2021

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent—exceptions noted

	Reported data							
	Calendar year						Jan-Jun	
	2015	2016	2017	2018	2019	2020	2020	2021
Net sales:								
Quantity	3,823,700	3,549,814	3,486,383	3,437,750	3,155,868	2,261,139	1,151,445	1,104,282
Value.....	3,396,525	3,332,430	3,220,163	3,322,432	3,270,723	2,305,494	1,177,281	1,123,554
Unit value.....	\$937	\$939	\$924	\$966	\$1,036	\$1,020	\$1,022	\$1,017
Cost of goods sold (COGS).....	2,881,664	2,854,734	2,769,914	2,964,627	2,711,518	2,044,220	1,098,081	895,968
Gross profit or (loss) (fn2).....	514,861	477,696	450,249	357,805	559,205	261,274	81,200	227,588
SG&A expenses.....	222,498	214,322	214,694	210,987	208,740	101,791	81,845	48,025
Operating income or (loss) (fn2).....	292,363	263,374	235,555	146,838	350,465	159,483	19,355	179,563
Net income or (loss) (fn2).....	224,664	233,237	134,508	(157,442)	301,853	(11,610)	10,333	168,700
Unit COGS.....	\$795	\$804	\$794	\$862	\$859	\$904	\$952	\$811
Unit SG&A expenses.....	\$81	\$80	\$82	\$81	\$86	\$45	\$54	\$43
Unit operating income or (loss) (fn2).....	\$81	\$74	\$68	\$43	\$111	\$71	\$17	\$183
Unit net income or (loss) (fn2).....	\$62	\$66	\$39	\$(46)	\$98	\$(5)	\$9	\$151
COGS/sales (fn1).....	84.8	85.7	86.0	89.2	82.9	88.7	93.1	79.7
Operating income or (loss)/sales (fn1).....	8.6	7.9	7.3	4.4	10.7	8.9	1.8	18.0
Net income or (loss)/sales (fn1).....	6.6	7.0	4.2	(4.7)	9.2	(0.5)	0.9	14.8
Capital expenditures.....
Research and development expenses.....
Net assets.....

Table continued.

Table C-1 continued

Uncoated paper: Summary data concerning the U.S. market, 2015-20, January to June 2020, and January to June 2021

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent—exceptions noted

	Period changes						
	Comparison years						Jan-Jun 2020-21
	2015-20	2015-18	2016-17	2017-18	2018-19	2019-20	
Net sales:							
Quantity.....	▼(37.6)	▼(2.0)	▼(1.8)	▼(1.4)	▼(8.2)	▼(28.3)	▼(4.1)
Value.....	▼(32.1)	▼(1.9)	▼(3.4)	▲3.2	▼(1.6)	▼(29.5)	▼(4.6)
Unit value.....	▲8.8	▲0.2	▼(1.6)	▲4.6	▲7.2	▼(1.5)	▼(0.5)
Cost of goods sold (COGS).....	▼(29.1)	▼(0.9)	▼(3.0)	▲7.0	▼(8.5)	▼(24.6)	▼(18.3)
Gross profit or (loss) (fn2).....	▼(49.3)	▼(7.2)	▼(5.7)	▼(20.5)	▲56.3	▼(53.3)	▲180.3
SG&A expenses.....	▼(54.3)	▼(3.7)	▲0.2	▼(1.7)	▼(1.1)	▼(51.2)	▼(22.3)
Operating income or (loss) (fn2).....	▼(45.5)	▼(9.9)	▼(10.6)	▼(37.7)	▲138.7	▼(54.5)	▲827.7
Net income or (loss) (fn2).....	▼***	▲3.8	▼(42.3)	▼***	▲***	▼***	▲1,513.3
Unit COGS.....	▲13.7	▲1.1	▼(1.2)	▲8.5	▼(0.4)	▲5.2	▼(14.8)
Unit SG&A expenses.....	▼(26.7)	▼(1.7)	▲2.0	▼(0.3)	▲7.8	▼(31.9)	▼(19.0)
Unit operating income or (loss) (fn2).....	▼(12.6)	▼(8.0)	▼(8.9)	▼(38.8)	▲160.0	▼(36.5)	▲867.4
Unit net income or (loss) (fn2).....	▼***	▲6.0	▼(41.3)	▼***	▲***	▼***	▲1,582.2
COGS/sales (fn1).....	▲3.8	▲0.8	▲0.4	▲3.2	▼(6.3)	▲5.8	▼(13.4)
Operating income or (loss)/sales (fn1).....	▼(1.7)	▼(0.7)	▼(0.6)	▼(2.9)	▲6.3	▼(3.8)	▲14.3
Net income or (loss)/sales (fn1).....	▼(7.1)	▲0.4	▼(2.8)	▼(8.9)	▲14.0	▼(9.7)	▲14.0
Capital expenditures.....	▲***	▼***	▲***	▲***	▲***	▼***	▲***
Research and development expenses.....	▼***	▲***	▼***	▲***	▼***	▼***	▲***
Net assets.....	▲***	▲***	▲***	▲***	▲***	▲***	NA

Note.—Data for imports from China and Indonesia are based on official Commerce statistics. Data for all other sources are based on questionnaire responses. Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "0.05" percent (if negative). Zeros, null values, and undefined calculations are suppressed and shown as "—". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

fn1.—Reported data are in percent and period changes are in percentage points.

fn2.—Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

Source: Compiled from data submitted in response to Commission questionnaires and Official U.S. Import statistics using HTS statistical reporting number 4802.56.1000, 4802.56.2000, 4802.56.3000, 4802.56.4000, 4802.56.6000, 4802.56.7020, 4802.56.7040, 4802.56.7050, 4802.56.7090, 4802.57.1000, 4802.57.1020, 4802.57.1040, 4802.57.1090, 4802.57.2000, 4802.57.3000, 4802.57.4000, 4802.57.4020, 4802.57.4040, and 4802.57.4090 accessed October 21, 2021.

APPENDIX D

FIRMS' NARRATIVES ON THE IMPACT OF COVID-19

MEMORANDUM FOR THE RECORD OF CONDUCT



104 1304

Table D-1

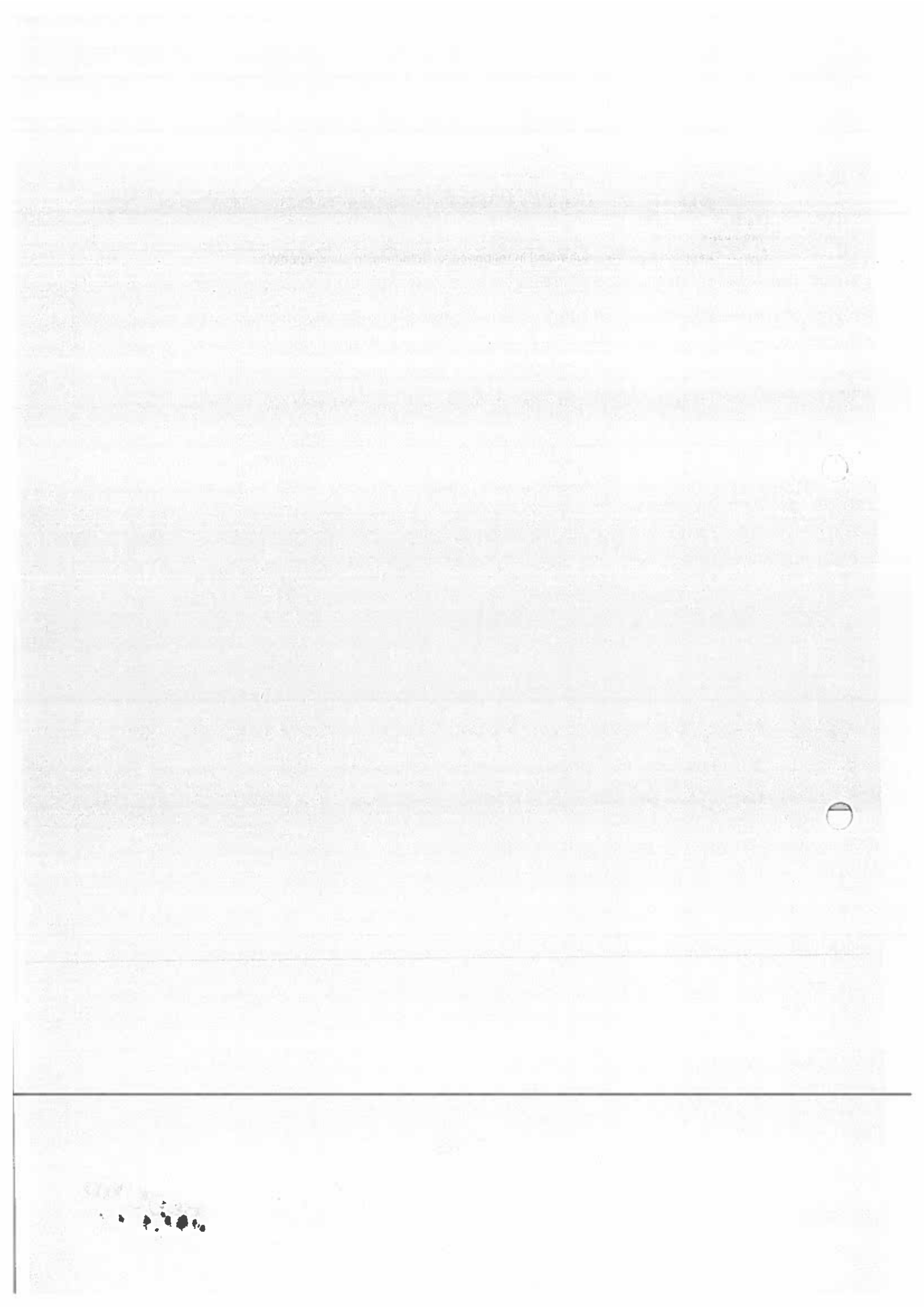
Uncoated paper: Firms' narratives on the impact of COVID-19

Firm type	Firm name and its narrative response on impact or likely impact
U.S. producers	***.
U.S. producers	***.
U.S. producers	***.
U.S. producers	***.
U.S. producers	***.
U.S. producers	***.
Importers	***.
Importers	***.
Importers	***.
Importers	***.
Importers	***.
Importers	***.
Importers	***.
Importers	***.

Firm type	Firm name and its narrative response on impact or likely impact
Importers	***
Importers	***
Foreign producers	***
Foreign producers	***
Foreign producers	***
Foreign producers	***

Firm type	Firm name and its narrative response on impact or likely impact
Foreign producers	***

Source: Compiled from data submitted in response to Commission questionnaires.



APPENDIX E
LIKELY EFFECTS OF REVOCATION

EXHIBIT

STATE OF CALIFORNIA

1/17/2017

01/17/2017

Table E-1
Uncoated paper: Firms' narrative response on the effect of the orders and the likely impact of revocation

Response type	Firm type	Firm name and its narrative response on impact or likely impact
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***

PAGE NO

Response type	Firm type	Firm name and its narrative response on impact or likely impact
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***

Response type	Firm type	Firm name and its narrative response on impact or likely impact
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***

Response type	Firm type	Firm name and its narrative response on impact or likely impact
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***

Response type	Firm type	Firm name and its narrative response on impact or likely impact
Likely impact of revocation	Importers	***
Effect of revocation	Purchasers	***
Effect of revocation	Purchasers	***
Effect of revocation	Purchasers	***
Effect of revocation	Purchasers	***
Effect of revocation	Purchasers	***
Effect of revocation	Purchasers	***
Effect of revocation	Purchasers	***
Effect of revocation	Purchasers	***
Effect of revocation	Purchasers	***
Effect of revocation	Purchasers	***
Effect of revocation	Purchasers	***
Effect of revocation	Purchasers	***
Effect of revocation	Purchasers	***
Effect of revocation	Purchasers	***
Effect of revocation	Purchasers	***

Response type	Firm type	Firm name and its narrative response on impact or likely impact
Effect of revocation	Purchasers	***
Effect of revocation	Purchasers	***
Effect of revocation	Purchasers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***

Response type	Firm type	Firm name and its narrative response on impact or likely impact
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table with multiple rows and columns, containing mostly illegible text and some faint markings.

Handwritten notes or signatures at the bottom of the page, including a prominent dark ink mark.

APPENDIX F
OFFICIAL IMPORT STATISTICS

OFFICE REPORT



10/10/10

Table F-1
Uncoated paper: U.S. imports, by source and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton

Source	Measure	2015	2016	2017
Australia	Quantity	47,735	23	—
Brazil	Quantity	139,570	89,290	61,996
China	Quantity	36,241	732	604
Indonesia	Quantity	148,520	43,339	15,317
Portugal	Quantity	188,656	149,933	122,433
Subject sources	Quantity	560,722	283,317	200,350
Nonsubject sources	Quantity	259,793	320,349	321,440
All import sources	Quantity	820,515	603,666	521,790
Australia	Value	39,875	14	—
Brazil	Value	120,282	79,242	53,709
China	Value	29,394	901	825
Indonesia	Value	129,380	40,944	13,453
Portugal	Value	179,251	153,132	130,958
Subject sources	Value	498,182	274,233	198,945
Nonsubject sources	Value	266,195	303,864	302,521
All import sources	Value	764,377	578,097	501,467
Australia	Unit value	835	585	—
Brazil	Unit value	862	887	866
China	Unit value	811	1,232	1,365
Indonesia	Unit value	871	945	878
Portugal	Unit value	950	1,021	1,070
Subject sources	Unit value	888	968	993
Nonsubject sources	Unit value	1,025	949	941
All import sources	Unit value	932	958	961

Table continued on next page.

Table F-1- continued
Uncoated paper: U.S. imports, by source and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton

Source	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Australia	Quantity	---	174	1	1	---
Brazil	Quantity	24,866	60,251	45,268	18,323	28,091
China	Quantity	461	2,462	1,390	1,138	58
Indonesia	Quantity	12,280	21,749	189	189	---
Portugal	Quantity	136,205	111,701	82,077	44,063	50,407
Subject sources	Quantity	173,812	196,337	128,925	63,714	78,556
Nonsubject sources	Quantity	361,527	418,021	338,755	166,000	195,281
All import sources	Quantity	535,339	614,359	467,680	229,714	273,838
Australia	Value	---	149	4	4	---
Brazil	Value	25,154	65,361	43,168	18,932	20,485
China	Value	627	2,868	2,008	1,543	211
Indonesia	Value	11,657	19,449	144	144	---
Portugal	Value	128,971	107,686	76,374	40,841	45,328
Subject sources	Value	166,408	195,513	121,699	61,464	66,023
Nonsubject sources	Value	351,052	438,625	337,901	166,031	207,502
All import sources	Value	517,460	634,139	459,599	227,495	273,525
Australia	Unit value	---	856	3,146	3,146	---
Brazil	Unit value	1,012	1,085	954	1,033	729
China	Unit value	1,359	1,165	1,445	1,356	3,603
Indonesia	Unit value	949	894	765	765	---
Portugal	Unit value	947	964	931	927	899
Subject sources	Unit value	957	996	944	965	840
Nonsubject sources	Unit value	971	1,049	997	1,000	1,063
All import sources	Unit value	967	1,032	983	990	999

Table continued on next page.

Table F-1- continued

Uncoated paper: U.S. imports, by source and period

Share and ratio in percent; ratios represent the ratio to U.S. production

Source	Measure	2015	2016	2017
Australia	Share of quantity	5.8	0.0	—
Brazil	Share of quantity	17.0	14.8	11.9
China	Share of quantity	4.4	0.1	0.1
Indonesia	Share of quantity	18.1	7.2	2.9
Portugal	Share of quantity	23.0	24.8	23.5
Subject sources	Share of quantity	68.3	46.9	38.4
Nonsubject sources	Share of quantity	31.7	53.1	61.6
All import sources	Share of quantity	100.0	100.0	100.0
Australia	Share of value	5.2	0.0	—
Brazil	Share of value	15.7	13.7	10.7
China	Share of value	3.8	0.2	0.2
Indonesia	Share of value	16.9	7.1	2.7
Portugal	Share of value	23.5	26.5	26.1
Subject sources	Share of value	65.2	47.4	39.7
Nonsubject sources	Share of value	34.8	52.6	60.3
All import sources	Share of value	100.0	100.0	100.0
Australia	Ratio	1.3	0.0	—
Brazil	Ratio	3.9	2.6	1.8
China	Ratio	1.0	0.0	0.0
Indonesia	Ratio	4.1	1.2	0.4
Portugal	Ratio	5.2	4.3	3.5
Subject sources	Ratio	15.6	8.1	5.8
Nonsubject sources	Ratio	7.2	9.2	9.3
All import sources	Ratio	22.8	17.3	15.1

Table continued on next page.

Table F-1 continued
Uncoated paper: U.S. imports, by source and period

Share and ratio in percent; ratios represent the ratio to U.S. production

Source	Measure	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Australia	Share of quantity	---	0.0	0.0	0.0	---
Brazil	Share of quantity	4.6	9.8	9.7	8.0	10.3
China	Share of quantity	0.1	0.4	0.3	0.5	0.0
Indonesia	Share of quantity	2.3	3.5	0.0	0.1	---
Portugal	Share of quantity	25.4	18.2	17.5	19.2	18.4
Subject sources	Share of quantity	32.5	32.0	27.6	27.7	28.7
Nonsubject sources	Share of quantity	67.5	68.0	72.4	72.3	71.3
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
Australia	Share of value	---	0.0	0.0	0.0	---
Brazil	Share of value	4.9	10.3	9.4	8.3	7.5
China	Share of value	0.1	0.5	0.4	0.7	0.1
Indonesia	Share of value	2.3	3.1	0.0	0.1	---
Portugal	Share of value	24.9	17.0	16.6	18.0	16.6
Subject sources	Share of value	32.2	30.8	26.5	27.0	24.1
Nonsubject sources	Share of value	67.8	69.2	73.5	73.0	75.9
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
Australia	Ratio	---	0.0	0.0	0.0	---
Brazil	Ratio	0.7	1.9	2.1	1.7	2.8
China	Ratio	0.0	0.1	0.1	0.1	0.0
Indonesia	Ratio	0.4	0.7	0.0	0.0	---
Portugal	Ratio	4.0	3.5	3.8	4.0	5.0
Subject sources	Ratio	5.1	6.2	5.9	5.8	7.7
Nonsubject sources	Ratio	10.7	13.2	15.6	15.1	19.2
All import sources	Ratio	15.8	19.4	21.5	20.8	26.9

Source: Official U.S. import statistics using HTS statistical reporting number 4802.56.1000, 4802.56.2000, 4802.56.3000, 4802.56.4000, 4802.56.6000, 4802.56.7020, 4802.56.7040, 4802.56.7050, 4802.56.7090, 4802.57.1000, 4802.57.1020, 4802.57.1040, 4802.57.1090, 4802.57.2000, 4802.57.3000, 4802.57.4000, 4802.57.4020, 4802.57.4040, and 4802.57.4090 accessed October 21, 2021.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeros, null values, and undefined calculations are suppressed and shown as "---".

Please check As per Appendix B-Part II serial 12, NOC from Pakistan Security Papers and Security Printing Corporation is required on import of "Security paper", Provided that Pakistan Security Printing Corporation shall be allowed to import the said paper without taking NOC from the Security Papers Limited to meet its own requirement

Please check As per Appendix G serial 264 "Weighing 40 g/ m² or more but not more than 150 g/ m², in , sheets with one side not exceeding 435 mm and the other side not exceeding 297mm in the unfolded state" classifiable under PCT 4802.5600 is Not Impor

Exemptions / SROs

Duty	SRO	Description
Customs Duty	SRO1261(I)/2007-2568	Table-I - Custom Duty @ 20% on imports of goods into Pakistan from Malaysia under FTA - Weighing 40 g/ m ² or more but not more than 150 g/ m ² , in sheets with one side not exceeding 435 mm and the other side not exceeding 297mm in the unfolded state
Customs Duty	SRO280(I)/2014-1	Federal Government is pleased to exempt on import into Pakistan from Sri Lanka, if made in conformity with the "rules of Determination of Origin of Goods under the Free Trade Agreement between the Islamic Republic of Pakistan and the Democratic Socialist Republic of Sri Lanka (Pakistan-Sri Lanka FTA Rules of Origin)" and the operating "Certification Procedures for the Rules of Origin", notified by the Ministry of Commerce- ALL THE GOODS MENTIONED IN THE FISRT SCHEDULE TO THE SAID ACT BUT NOT SPECIFIED IN TABLES I, II & III OF SRO 280(I)/2014
Customs Duty	SRO558(I)/2004-956	Concession of Customs Duty @15% under the Agreement of LDC countries on the import of - Weighing 40 g/m ² or more but not more than 150 g/m ² , in sheets with one side not exceeding 435 mm and the other side not exceeding 297 mm in the unfolded state. .
Income Tax	Part II of First Schedule-3	Persons importing goods classified in Part-III of the Twelfth Schedule for ATL

1954 25000

APPENDIX G

FINANCIAL EXPERIENCE OF U.S. PRODUCERS

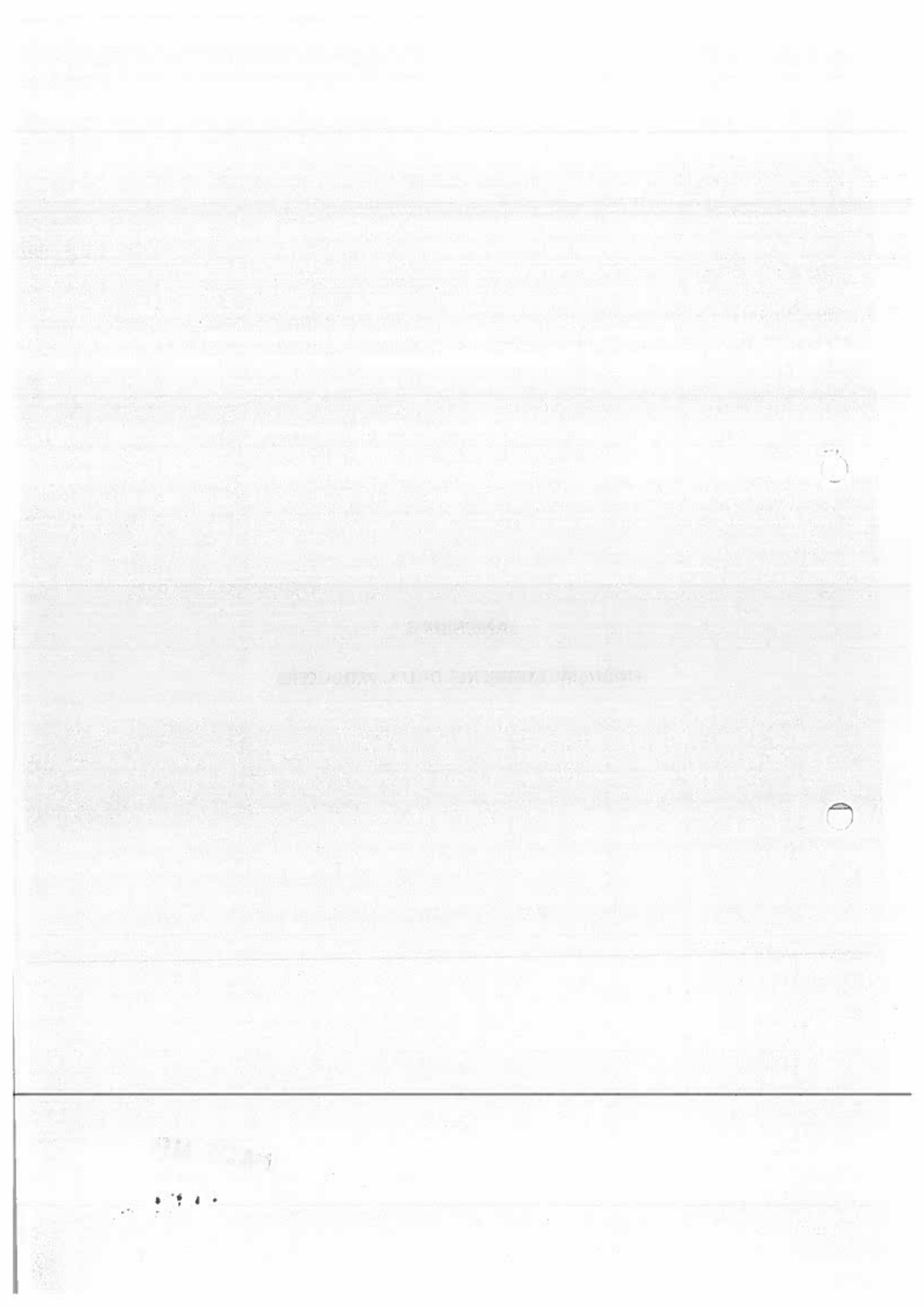


Table G-1
Uncoated paper: Firm-by-firm total net sales quantity, by period

Net sales quantity

Quantity in short tons

Firm	2015	2016	2017
Boise	***	***	***
Domtar	***	***	***
Finch Paper	***	***	***
Georgia-Pacific	***	***	***
International Paper	***	***	***
NORPAC	***	***	***
Performance Office Paper	***	***	***
Pixelle	***	***	***
All firms	3,623,700	3,549,814	3,486,383

Table continued.

Table G-1—Continued
Uncoated paper: Firm-by-firm total net sales quantity, by period

Net sales quantity

Quantity in short tons

Firm	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Boise	***	***	***	***	***
Domtar	***	***	***	***	***
Finch Paper	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
International Paper	***	***	***	***	***
NORPAC	***	***	***	***	***
Performance Office Paper	***	***	***	***	***
Pixelle	***	***	***	***	***
All firms	3,437,750	3,155,666	2,261,139	1,151,445	1,104,262

Table continued.

Table G-1—Continued
Uncoated paper: Firm-by-firm total net sales value, by period

Net sales value

Value in 1,000 dollars

Firm	2015	2016	2017
Boise	***	***	***
Domtar	***	***	***
Finch Paper	***	***	***
Georgia-Pacific	***	***	***
International Paper	***	***	***
NORPAC	***	***	***
Performance Office Paper	***	***	***
Pixelle	***	***	***
All firms	3,396,525	3,332,430	3,220,163

Table continued.

Table G-1—Continued
Uncoated paper: Firm-by-firm total net sales value, by period

Net sales value

Value in 1,000 dollars

Firm	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Boise	***	***	***	***	***
Domtar	***	***	***	***	***
Finch Paper	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
International Paper	***	***	***	***	***
NORPAC	***	***	***	***	***
Performance Office Paper	***	***	***	***	***
Pixelle	***	***	***	***	***
All firms	3,322,432	3,270,723	2,305,494	1,177,281	1,123,554

Table continued.

Table G-1—Continued
Uncoated paper: Firm-by-firm cost of goods sold ("COGS"), by period

COGS

Value in 1,000 dollars

Firm	2015	2016	2017
Boise	***	***	***
Domtar	***	***	***
Finch Paper	***	***	***
Georgia-Pacific	***	***	***
International Paper	***	***	***
NORPAC	***	***	***
Performance Office Paper	***	***	***
Pixelle	***	***	***
All firms	2,881,664	2,854,734	2,769,914

Table continued.

Table G-1—Continued
Uncoated paper: Firm-by-firm cost of goods sold ("COGS"), by period

COGS

Value in 1,000 dollars

Firm	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Boise	***	***	***	***	***
Domtar	***	***	***	***	***
Finch Paper	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
International Paper	***	***	***	***	***
NORPAC	***	***	***	***	***
Performance Office Paper	***	***	***	***	***
Pixelle	***	***	***	***	***
All firms	2,964,627	2,711,518	2,044,220	1,096,081	895,966

Table continued.

Table G-1—Continued

Uncoated paper: Firm-by-firm gross profit or (loss), by period

Gross profit or (loss)

Value in 1,000 dollars

Firm	2015	2016	2017
Boise	***	***	***
Domtar	***	***	***
Finch Paper	***	***	***
Georgia-Pacific	***	***	***
International Paper	***	***	***
NORPAC	***	***	***
Performance Office Paper	***	***	***
Pixelle	***	***	***
All firms	514,861	477,696	450,249

Table continued.

Table G-1—Continued

Uncoated paper: Firm-by-firm gross profit or (loss), by period

Gross profit or (loss)

Value in 1,000 dollars

Firm	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Boise	***	***	***	***	***
Domtar	***	***	***	***	***
Finch Paper	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
International Paper	***	***	***	***	***
NORPAC	***	***	***	***	***
Performance Office Paper	***	***	***	***	***
Pixelle	***	***	***	***	***
All firms	357,805	559,205	261,274	81,200	227,588

Table continued.

Table G-1—Continued

Uncoated paper: Firm-by-firm selling, general, and administrative ("SG&A") expenses, by period

SG&A expenses

Value in 1,000 dollars

Firm	2015	2016	2017
Boise	***	***	***
Domtar	***	***	***
Finch Paper	***	***	***
Georgia-Pacific	***	***	***
International Paper	***	***	***
NORPAC	***	***	***
Performance Office Paper	***	***	***
Pixelle	***	***	***
All firms	222,498	214,322	214,694

Table continued.

Table G-1—Continued

Uncoated paper: Firm-by-firm selling, general, and administrative ("SG&A") expenses, by period

SG&A expenses

Value in 1,000 dollars

Firm	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Boise	***	***	***	***	***
Domtar	***	***	***	***	***
Finch Paper	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
International Paper	***	***	***	***	***
NORPAC	***	***	***	***	***
Performance Office Paper	***	***	***	***	***
Pixelle	***	***	***	***	***
All firms	210,967	208,740	101,791	61,845	48,025

Table continued.

Table G-1—Continued

Uncoated paper: Firm-by-firm operating income or (loss), by period

Operating income or (loss)

Value in 1,000 dollars

Firm	2015	2016	2017
Boise	***	***	***
Domtar	***	***	***
Finch Paper	***	***	***
Georgia-Pacific	***	***	***
International Paper	***	***	***
NORPAC	***	***	***
Performance Office Paper	***	***	***
Pixelle	***	***	***
All firms	292,363	263,374	235,555

Table continued.

Table G-1—Continued

Uncoated paper: Firm-by-firm operating income or (loss), by period

Operating income or (loss)

Value in 1,000 dollars

Firm	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Boise	***	***	***	***	***
Domtar	***	***	***	***	***
Finch Paper	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
International Paper	***	***	***	***	***
NORPAC	***	***	***	***	***
Performance Office Paper	***	***	***	***	***
Pixelle	***	***	***	***	***
All firms	146,838	350,466	150,483	19,355	179,583

Table continued.

Table G-1—Continued
 Uncoated paper: Firm-by-firm net income or (loss), by period

Net income or (loss)

Value in 1,000 dollars

Firm	2015	2016	2017
Boise	***	***	***
Domtar	***	***	***
Finch Paper	***	***	***
Georgia-Pacific	***	***	***
International Paper	***	***	***
NORPAC	***	***	***
Performance Office Paper	***	***	***
Pixelle	***	***	***
All firms	224,664	233,237	134,508

Table continued.

Table G-1—Continued
 Uncoated paper: Firm-by-firm net income or (loss), by period

Net income or (loss)

Value in 1,000 dollars

Firm	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Boise	***	***	***	***	***
Domtar	***	***	***	***	***
Finch Paper	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
International Paper	***	***	***	***	***
NORPAC	***	***	***	***	***
Performance Office Paper	***	***	***	***	***
Pixelle	***	***	***	***	***
All firms	(157,442)	301,853	(11,610)	10,333	166,700

Table continued.

Table G-1—Continued
 Uncoated paper: Firm-by-firm ratio of COGS to net sales value, by period

COGS to net sales ratio

Ratios in percent

Firm	2015	2016	2017
Boise	***	***	***
Domtar	***	***	***
Finch Paper	***	***	***
Georgia-Pacific	***	***	***
International Paper	***	***	***
NORPAC	***	***	***
Performance Office Paper	***	***	***
Pixelle	***	***	***
All firms	84.8	85.7	86.0

Table continued.

Table G-1—Continued
Uncoated paper: Firm-by-firm ratio of COGS to net sales value, by period

COGS to net sales ratio

Ratios in percent

Firm	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Boise	***	***	***	***	***
Domtar	***	***	***	***	***
Finch Paper	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
International Paper	***	***	***	***	***
NORPAC	***	***	***	***	***
Performance Office Paper	***	***	***	***	***
Pixelle	***	***	***	***	***
All firms	89.2	82.9	88.7	93.1	79.7

Table continued.

Table G-1—Continued
Uncoated paper: Firm-by-firm ratio of gross profit or (loss) to net sales value, by period

Gross profit or (loss) to net sales ratio

Ratios in percent

Firm	2015	2016	2017
Boise	***	***	***
Domtar	***	***	***
Finch Paper	***	***	***
Georgia-Pacific	***	***	***
International Paper	***	***	***
NORPAC	***	***	***
Performance Office Paper	***	***	***
Pixelle	***	***	***
All firms	15.2	14.3	14.0

Table continued.

Table G-1—Continued
Uncoated paper: Firm-by-firm ratio of gross profit or (loss) to net sales value, by period

Gross profit or (loss) to net sales ratio

Ratios in percent

Firm	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Boise	***	***	***	***	***
Domtar	***	***	***	***	***
Finch Paper	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
International Paper	***	***	***	***	***
NORPAC	***	***	***	***	***
Performance Office Paper	***	***	***	***	***
Pixelle	***	***	***	***	***
All firms	10.8	17.1	11.3	6.9	20.3

Table continued.

Table G-1—Continued

Uncoated paper: Firm-by-firm ratio of SG&A expenses to net sales value, by period

SG&A expenses to net sales ratio

Ratios in percent

Firm	2015	2016	2017
Boise	***	***	***
Domtar	***	***	***
Finch Paper	***	***	***
Georgia-Pacific	***	***	***
International Paper	***	***	***
NORPAC	***	***	***
Performance Office Paper	***	***	***
Pixelle	***	***	***
All firms	6.6	6.4	6.7

Table continued.

Table G-1—Continued

Uncoated paper: Firm-by-firm ratio of SG&A expenses to net sales value, by period

SG&A expenses to net sales ratio

Ratios in percent

Firm	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Boise	***	***	***	***	***
Domtar	***	***	***	***	***
Finch Paper	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
International Paper	***	***	***	***	***
NORPAC	***	***	***	***	***
Performance Office Paper	***	***	***	***	***
Pixelle	***	***	***	***	***
All firms	6.3	6.4	4.4	5.3	4.3

Table continued.

Table G-1—Continued

Uncoated paper: Firm-by-firm ratio of operating income or (loss) to net sales value, by period

Operating income or (loss) to net sales ratio

Ratios in percent

Firm	2015	2016	2017
Boise	***	***	***
Domtar	***	***	***
Finch Paper	***	***	***
Georgia-Pacific	***	***	***
International Paper	***	***	***
NORPAC	***	***	***
Performance Office Paper	***	***	***
Pixelle	***	***	***
All firms	8.6	7.9	7.3

Table continued.

Table G-1—Continued

Uncoated paper: Firm-by-firm ratio of operating income or (loss) to net sales value, by period

Operating income or (loss) to net sales ratio

Ratios in percent

Firm	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Boise	***	***	***	***	***
Domtar	***	***	***	***	***
Finch Paper	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
International Paper	***	***	***	***	***
NORPAC	***	***	***	***	***
Performance Office Paper	***	***	***	***	***
Pixelle	***	***	***	***	***
All firms	4.4	10.7	6.9	1.6	16.0

Table continued.

Table G-1—Continued

Uncoated paper: Firm-by-firm ratio of net income or (loss) to net sales value, by period

Net income or (loss) to net sales ratio

Ratios in percent

Firm	2015	2016	2017
Boise	***	***	***
Domtar	***	***	***
Finch Paper	***	***	***
Georgia-Pacific	***	***	***
International Paper	***	***	***
NORPAC	***	***	***
Performance Office Paper	***	***	***
Pixelle	***	***	***
All firms	6.6	7.0	4.2

Table continued.

Table G-1—Continued

Uncoated paper: Firm-by-firm ratio of net income or (loss) to net sales value, by period

Net income or (loss) to net sales ratio

Ratios in percent

Firm	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Boise	***	***	***	***	***
Domtar	***	***	***	***	***
Finch Paper	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
International Paper	***	***	***	***	***
NORPAC	***	***	***	***	***
Performance Office Paper	***	***	***	***	***
Pixelle	***	***	***	***	***
All firms	(4.7)	9.2	(0.5)	0.9	14.8

Table continued.

Table G-1—Continued
Uncoated paper: Firm-by-firm unit net sales value, by period

Unit net sales value

Unit values in dollars per short ton

Firm	2015	2016	2017
Boise	***	***	***
Domtar	***	***	***
Finch Paper	***	***	***
Georgia-Pacific	***	***	***
International Paper	***	***	***
NORPAC	***	***	***
Performance Office Paper	***	***	***
Pixelle	***	***	***
All firms	937	939	924

Table continued.

Table G-1—Continued
Uncoated paper: Firm-by-firm unit net sales value, by period

Unit net sales value

Unit values in dollars per short ton

Firm	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Boise	***	***	***	***	***
Domtar	***	***	***	***	***
Finch Paper	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
International Paper	***	***	***	***	***
NORPAC	***	***	***	***	***
Performance Office Paper	***	***	***	***	***
Pixelle	***	***	***	***	***
All firms	966	1,036	1,020	1,022	1,017

Table continued.

Table G-1—Continued
Uncoated paper: Firm-by-firm unit raw material costs, by period

Unit raw material

Unit values in dollars per short ton

Firm	2015	2016	2017
Boise	***	***	***
Domtar	***	***	***
Finch Paper	***	***	***
Georgia-Pacific	***	***	***
International Paper	***	***	***
NORPAC	***	***	***
Performance Office Paper	***	***	***
Pixelle	***	***	***
All firms	376	377	380

Table continued.

Table G-1—Continued
Uncoated paper: Firm-by-firm unit raw material costs, by period

Unit raw material

Unit values in dollars per short ton

Firm	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Boise	***	***	***	***	***
Domtar	***	***	***	***	***
Finch Paper	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
International Paper	***	***	***	***	***
NORPAC	***	***	***	***	***
Performance Office Paper	***	***	***	***	***
Pixelle	***	***	***	***	***
All firms	397	401	388	399	361

Table continued.

Table G-1—Continued
Uncoated paper: Firm-by-firm unit direct labor cost, by period

Unit direct labor

Unit values in dollars per short ton

Firm	2015	2016	2017
Boise	***	***	***
Domtar	***	***	***
Finch Paper	***	***	***
Georgia-Pacific	***	***	***
International Paper	***	***	***
NORPAC	***	***	***
Performance Office Paper	***	***	***
Pixelle	***	***	***
All firms	102	107	100

Table continued.

Table G-1—Continued
Uncoated paper: Firm-by-firm unit direct labor cost, by period

Unit direct labor

Unit values in dollars per short ton

Firm	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Boise	***	***	***	***	***
Domtar	***	***	***	***	***
Finch Paper	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
International Paper	***	***	***	***	***
NORPAC	***	***	***	***	***
Performance Office Paper	***	***	***	***	***
Pixelle	***	***	***	***	***
All firms	111	123	147	156	122

Table continued.

FACT NO

Table G-1—Continued

Uncoated paper: Firm-by-firm unit other factory costs, by period

Unit other factory costs

Unit values in dollars per short ton

Firm	2015	2016	2017
Boise	***	***	***
Domtar	***	***	***
Finch Paper	***	***	***
Georgia-Pacific	***	***	***
International Paper	***	***	***
NORPAC	***	***	***
Performance Office Paper	***	***	***
Pixelle	***	***	***
All firms	259	265	256

Table continued.

Table G-1—Continued

Uncoated paper: Firm-by-firm unit other factory costs, by period

Unit other factory costs

Unit values in dollars per short ton

Firm	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Boise	***	***	***	***	***
Domtar	***	***	***	***	***
Finch Paper	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
International Paper	***	***	***	***	***
NORPAC	***	***	***	***	***
Performance Office Paper	***	***	***	***	***
Pixelle	***	***	***	***	***
All firms	294	274	308	331	274

Table continued.

Table G-1—Continued

Uncoated paper: Firm-by-firm unit COGS, by period

Unit COGS

Unit values in dollars per short ton

Firm	2015	2016	2017
Boise	***	***	***
Domtar	***	***	***
Finch Paper	***	***	***
Georgia-Pacific	***	***	***
International Paper	***	***	***
NORPAC	***	***	***
Performance Office Paper	***	***	***
Pixelle	***	***	***
All firms	795	804	794

Table continued.

Table G-1—Continued
Uncoated paper: Firm-by-firm unit COGS, by period

Unit COGS

Unit values in dollars per short ton

Firm	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Boise	***	***	***	***	***
Domtar	***	***	***	***	***
Finch Paper	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
International Paper	***	***	***	***	***
NORPAC	***	***	***	***	***
Performance Office Paper	***	***	***	***	***
Pixelle	***	***	***	***	***
All firms	862	859	904	952	811

Table continued.

Table G-1—Continued
Uncoated paper: Firm-by-firm unit gross profit or (loss), by period

Unit gross profit or (loss)

Unit values in dollars per short ton

Firm	2015	2016	2017
Boise	***	***	***
Domtar	***	***	***
Finch Paper	***	***	***
Georgia-Pacific	***	***	***
International Paper	***	***	***
NORPAC	***	***	***
Performance Office Paper	***	***	***
Pixelle	***	***	***
All firms	142	135	129

Table continued.

Table G-1—Continued
Uncoated paper: Firm-by-firm unit gross profit or (loss), by period

Unit gross profit or (loss)

Unit values in dollars per short ton

Firm	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Boise	***	***	***	***	***
Domtar	***	***	***	***	***
Finch Paper	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
International Paper	***	***	***	***	***
NORPAC	***	***	***	***	***
Performance Office Paper	***	***	***	***	***
Pixelle	***	***	***	***	***
All firms	104	177	116	71	206

Table continued.

Table G-1—Continued

Uncoated paper: Firm-by-firm unit SG&A expenses, by period

Unit SG&A expenses

Unit values in dollars per short ton

Firm	2015	2016	2017
Boise	***	***	***
Domtar	***	***	***
Finch Paper	***	***	***
Georgia-Pacific	***	***	***
International Paper	***	***	***
NORPAC	***	***	***
Performance Office Paper	***	***	***
Pixelle	***	***	***
All firms	61	60	62

Table continued.

Table G-1—Continued

Uncoated paper: Firm-by-firm unit SG&A expenses, by period

Unit SG&A expenses

Unit values in dollars per short ton

Firm	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Boise	***	***	***	***	***
Domtar	***	***	***	***	***
Finch Paper	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
International Paper	***	***	***	***	***
NORPAC	***	***	***	***	***
Performance Office Paper	***	***	***	***	***
Pixelle	***	***	***	***	***
All firms	61	66	45	54	43

Table continued.

Table G-1—Continued

Uncoated paper: Firm-by-firm unit operating income or (loss), by period

Unit operating income or (loss)

Unit values in dollars per short ton

Firm	2015	2016	2017
Boise	***	***	***
Domtar	***	***	***
Finch Paper	***	***	***
Georgia-Pacific	***	***	***
International Paper	***	***	***
NORPAC	***	***	***
Performance Office Paper	***	***	***
Pixelle	***	***	***
All firms	81	74	68

Table continued.

PLCE NO

Table G-1—Continued

Uncoated paper: Firm-by-firm unit operating income or (loss), by period

Unit operating income or (loss)

Unit values in dollars per short ton

Firm	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Boise	***	***	***	***	***
Domtar	***	***	***	***	***
Finch Paper	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
International Paper	***	***	***	***	***
NORPAC	***	***	***	***	***
Performance Office Paper	***	***	***	***	***
Pixelle	***	***	***	***	***
All firms	43	111	71	17	163

Table continued.

Table G-1—Continued

Uncoated paper: Firm-by-firm unit net income or (loss), by period

Unit net income or (loss)

Unit values in dollars per short ton

Firm	2015	2016	2017
Boise	***	***	***
Domtar	***	***	***
Finch Paper	***	***	***
Georgia-Pacific	***	***	***
International Paper	***	***	***
NORPAC	***	***	***
Performance Office Paper	***	***	***
Pixelle	***	***	***
All firms	62	66	39

Table continued.

Table G-1—Continued

Uncoated paper: Firm-by-firm unit net income or (loss), by period

Unit net income or (loss)

Unit values in dollars per short ton

Firm	2018	2019	2020	Jan-Jun 2020	Jan-Jun 2021
Boise	***	***	***	***	***
Domtar	***	***	***	***	***
Finch Paper	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
International Paper	***	***	***	***	***
NORPAC	***	***	***	***	***
Performance Office Paper	***	***	***	***	***
Pixelle	***	***	***	***	***
All firms	(46)	96	(5)	9	151

Source: Compiled from data submitted in response to Commission questionnaires.

Annexure-E

PAGE NO

Annexure-B



12/12/2023



Indonesia's Pulp and Paper Industry as GDP Contributor

by Syarifah | Dec 29, 2022 | Market Research | 0 comments

What are the opportunity drivers from the pulp and paper industry that can be optimized? How Indonesia has the potential to become the world's largest producer of pulp and paper?

Source: Unsplash

PAGE NO

Currently, paper packaging is increasingly being used in various sectors. One of the industries that use the largest paper packaging is quick service restaurants (QSR) or fast food restaurants. The growth of this industry has driven demand for paper packaging products, mainly due to the takeaway preference. In addition, food ordered through delivery services also contributed to the increase in the use of paper packaging. On the other hand, increasing concern for the environment such as global warming, biodegradability, and health problems caused by plastic packaging also contributes to market growth.

How is the growth of the pulp and paper industry of Indonesia? What are the top three products which have the highest demand and show potential?

The Growth and Potential of the Pulp and Paper Industry Globally

The market value of pulp and paper is predicted to continue to grow to USD 380.12 billion in 2030 with a CAGR of 4% for the period 2022 to 2030. Market growth was triggered by the increasing use of paper-based packaging due to the development of the e-commerce, smartphone, and internet industries, especially in developing countries. The rapid expansion of online retail in the developing countries is seen as supporting the growth. The rapid expansion of online retail in developing countries is seen as supporting growth.

The global trend that is also happening is that a number of companies and even countries are trying to create environmentally friendly and sustainable methods by enforcing regulations on the use of plastic for bags and packaging. This has also fueled a rise in paper bags as a more environmentally friendly and cost-effective substitute for plastic bags. This regulation makes shops, restaurants, supermarkets, and food service providers use paper-based packaging.

Based on its use, paper products on the global market include printing & writing, corrugating materials, tissue, wrapping paper, and others. In 2019, the corrugating segment contributed the largest revenue, namely more than 30% of the total market share in the world. Asia Pacific is a market with a higher demand for pulp compared to the European region. Asia Pacific is also one of the main pulp producers and users in the world, mainly due to

high domestic demand supported by easy access to capital.

A Solid Potential of The Pulp & Paper Industry in Indonesia

Based on data from the Rakyat Merdeka, the pulp and paper industry is also an industry that plays an important role in Indonesia's economic growth, with a contribution to GDP of 0.67% and generating state foreign exchange reaching USD 7.5 billion in 2021. Where is this foreign exchange generated? From pulp exports worth USD 3.28 billion to several countries such as China, Korea, India, Bangladesh, and Vietnam

Meanwhile, the export value of paper reached USD 4.22 billion with destinations to China, Japan, Vietnam, Malaysia, and the Philippines. With this export value, paper ranks 1st, and pulp ranks 4th for exports of forestry products in 2022 in Indonesia. Not only that, but Indonesia's pulp products also rank 1st in ASEAN and rank 3rd in Asia, while the paper is ranked 4th in Asia. At the world level, Indonesia is ranked 8th for pulp and 6th in the world for paper products.

Based on data from Fisher International, with 115 operating locations from 2014 to 2021, Indonesia plays an impactful role in the global structure of the pulp and paper industry. Forest Insight said that Indonesia has a very adequate availability of raw materials, making Indonesia present a large business potential that has a significant impact on the national economy. In 2022 Indonesia's pulp industry production capacity will be 12.13 million tons per year, while the paper production capacity will be 18.26 million tons per year.

Also based on data from Kontan.co.id, another impact created by the pulp and paper industry are its ability to provide employment to more than 161 thousand people directly and 1.2 million people indirectly. The Indonesian pulp and paper industry still has greater potential, by diversifying its products to increase added value, such as processing dissolving pulp to become viscose rayon as a raw material for textiles.

Investment in Indonesia's Market for Diversification of Environmentally Friendly Products

Based on data from Kontan.co.id, PT Riau Andalan Pulp and

NO
100

Paper (RAPP) will make an additional investment of USD 2.16 billion until 2023. The investment is intended for the construction of a paperboard-based green packaging factory with an estimated production capacity of 1.2 million tonnes per year which is recyclable and easily biodegradable. Also on AntaraNews.com that the investment would also increase kraft pulp production by 1.06 million tons and 600 thousand tons of Bleached Chemi-Thermo Mechanical Pulp (BCTMP).

According to Kontan.co.id, RAPP is a pulp producer of the Bleach Hardwood Kraft (BHK) type and dissolving pulp which uses up to 85% biomass energy in its production operations. The RAPP factory is integrated with the downstream industry and equipped with a modern nursery capable of producing up to 200 million tree seedlings per year and around 150 million trees are planted each year.

The new investment from RAPP indicates and answers the challenge that the Indonesian manufacturing sector is still vibrant and promising amidst the sluggish global economy. The government sees the paper industry has great potential because almost all types of paper including banknotes and valuable paper that have special specifications in meeting security aspects can already be produced domestically.

Top Demanded Products of the Pulp and Paper Industry in Indonesia

According to the report of the Food and Agriculture Organisation (FAO) 2019, Indonesia's paper consumption based on application is divided into packaging and paperboard at 49% of the total production, writing and printing paper at 41%, and hygiene paper at 9%. There are the top three pulp and paper products demand and hereby the details of each product type.

1. Packaging and Cartons

Paper and paperboard packaging production was recorded at 6.6 million tonnes in 2020. The growth was 1.5% compared to last year and higher than the industry's total growth, which was an average of -2%. Paper and paperboard packaging is widely used to produce cardboard boxes, kraft, sacks, to wrap paper. The growth of packaging paper and paperboard is expected to continue positively following the development trend of e-

commerce in Indonesia.

2. Writing and Printing Paper

Production of writing and printing paper is the second largest in Indonesia, even though this type of product experienced a decline in growth in 2020 compared to 2019 with a total production of 5.2 million tons. The decline in production is expected to be due to the declining trend of reading offline mass media due to the pandemic. The pandemic has also forced workers and students to carry out their activities at home which has reduced the use of paper.

3. Cleaning Paper

Hygienic paper production grew by 1.4%, from 1.1 million tonnes in 2019 to 1.3 million tonnes in 2020. Some of the drivers of growth came from the increased use of tissue during the pandemic. Consumers prefer to use a tissue instead of a cloth to simply clean their hands. This growth is also predicted to continue to increase due to pandemic factors.

Enter The Indonesian Pulp and Paper Market with BRIGHT Indonesia

Because of the huge impact of the pulp and paper industry in Indonesia, of course, it takes a lot of in-depth research about the pulp and paper market in Indonesia. So, to enter the Indonesian market, you need the right local partner to assist you.

BRIGHT Indonesia is an ideal business partner for you. We will assist you on the ground, including virtual assistants during the mission, logistical planning, and detailed communication. It can cause your company to focus on developing partnership cooperation rather than the hassles of the business trip.

BRIGHT Indonesia provides several services such as **Market Insight Research, Business Partnership Engagement, Management and Strategy Consulting, and Foreign Direct Investment**. The services will help your business to:

1. Provide assistance for you in expanding and developing your business by identification of potential partners.
2. Secure the agreement between client companies and future

Indonesian business partners by providing a list of potentially suitable partners, arranging business meetings, and acting as a liaison.

3. Supporting our foreign client companies from the private sector with developing corporate or business unit strategies or helping your company from public sector organizations with public policy.

4. Link client companies both from the private and public sectors in global foreign direct investment (FDI) through training and assisting your company in entering FDI source countries to gather investment for your company's local markets.

For more information, email info@brightindonesia.net

0 Comments

PA-1-10

Reach Us

BRIGHT Indonesia

Alamanda Tower, Level
23B
Jl. TB Simatupang Kav 23-
24
Jakarta, Indonesia

P : 021 22767137

M :
info@brightindonesia.net

BRIGHT Indonesia

Alamanda Tower, Level
23B

Jl. TB Simatupang Kav 23-
24

Jakarta, Indonesia

P : 021 22767137

info@brightindonesia.net
BRIGHT Indonesia

Alamanda Tower, Level
23B

Jl. TB Simatupang Kav 23-
24

Jakarta, Indonesia

P : 021 22767137

info@brightindonesia.net
BRIGHT Indonesia

Alamanda Tower, Level
23B

Jl. TB Simatupang Kav 23-
24

Jakarta, Indonesia

P : 021 22767137

info@brightindonesia.net
BRIGHT Indonesia

Have a Question ?

Interested in learning
more about our services?
Tell us how can we help
you and we will get in
touch with you soon

Have a Question ?

Interested in learning
more about our services?
Tell us how can we help
you and we will get in
touch with you soon

Submit

Reach Us

BRIGHT Indonesia

Alamanda Tower, Level
23B
Jl. TB Simatupang Kav 23-
24
Jakarta, Indonesia

P : 021 22767137

M :

info@brightindonesia.net

Have a Question ?

Interested in learning more about our services? Tell us how can we help you and we will get in touch with you soon

Submit

Annexure-F

PAGE NO

2023

5/1/19 1:45 PM

F. No. 7/8/2021-DGTR
Government of India
Ministry of Commerce & Industry
Department of Commerce
Directorate General of Trade Remedies
Jeevan Tara Building, 5 Parliament Street, New Delhi – 110001

Dated 26.11.2021

NOTIFICATION

FINAL FINDINGS

Case No. (SSR - 08/2021)

Subject: Sunset Review anti-dumping investigation concerning imports of “Uncoated Copier Paper” originating in or exported from Indonesia and Singapore.

A. BACKGROUND OF THE CASE

1. An anti-dumping investigation concerning imports of Uncoated copier paper (hereinafter also referred to as the subject goods or product under consideration or ‘PUC’) originating in or exported from Thailand, Singapore and Indonesia, was initiated by the Designated Authority (hereinafter referred to as ‘the Authority’) vide Notification No. 6/32/2017-DGAD dated 2nd November 2017. The Authority notified the final findings on 30th October 2018 recommending definitive anti-dumping duty on the imports of the subject goods from the subject countries. The definitive anti-dumping duty on the subject goods imported from the subject countries was imposed vide Notification No. 56/2018-Customs dated 4th December 2018 for a period of three years.
2. In terms of Section 9A (5) of the Act, anti-dumping duty imposed shall, unless revoked earlier, cease to have effect on expiry of five years from the date of such imposition and the Authority is required to review whether the expiry of anti-dumping duty is likely to lead to continuation or recurrence of dumping and injury.
3. In accordance with the above, the Authority is required to review, on the basis of a duly substantiated request made by or on behalf of the domestic industry, as to whether the expiry of anti-dumping duty is likely to lead to continuation or recurrence of dumping and injury.
4. And whereas, in terms of above provisions, M/s JK Paper Limited (hereinafter referred to as the “Applicant”) filed an application before the Designated Authority in accordance with the Customs Tariff Act, 1975 and the Anti-Dumping Rules requesting initiation of sunset review of anti-dumping duty (ADD) imposed on imports of “Uncoated copier

paper" (hereinafter referred to as "subject goods" or "product under consideration" or "PUC"), originating in or exported from Thailand, Indonesia and Singapore.

5. The Applicant sought continuation of the anti-dumping duty against imports of "Uncoated copier paper" from Indonesia, Singapore and Thailand. The request was based on the ground that the expiry of the anti-dumping duty was likely to result in continuation/recurrence of dumping of the subject goods and consequent injury to the domestic industry.
6. On the basis of *prima facie* evidence of likelihood of dumping and injury, the Authority initiated Sunset Review (SSR) investigation vide Notification No. 7/8/2021-DGTR dated 19th May 2021 to review the need for continued imposition of the duties in force in respect of the subject goods, originating in or exported from Indonesia and Singapore (hereinafter referred to as "subject countries") and to examine whether the expiry of the said ADD is likely to lead to continuation or recurrence of dumping and injury to the domestic industry. Sunset review investigation was not initiated on imports from Thailand.
7. Pending conclusion of the present review, the anti- dumping duty were extended up to and inclusive of 28th February 2022 vide Notification No. 48/2021-Customs (ADD) dated 27th August 2021.
8. The scope of the present review covers all aspects of the Final Findings Notification No. No. 6/32/2017-DGAD dated 30th October 2018.

B. PROCEDURE

9. The procedure described below has been followed in the present review:
 - i. The Authority vide Notification No. 7/8/2021-DGTR dated 19th May 2021 issued a public notice in the Gazette of India Extraordinary, initiating Sunset Review Investigation concerning anti-dumping duty imposed on imports of the subject goods from the subject countries.
 - ii. In accordance with rule 6(2) of the AD Rules, the Authority forwarded a copy of the initiation notification dated 19th May 2021, to the Embassies of the subject countries in India, the known producers and exporters from the subject countries, known importers/user associations and other interested parties, as per the addresses made available by the Applicant. The interested parties were advised to provide relevant information in the prescribed form and manner and to make their submissions known in writing within the prescribed time limit.
 - iii. The Authority provided a copy of the non-confidential version of the application to ~~the known producers/exporters and to the Embassies of the subject countries in~~ India in accordance with Rule 6(3) of the Rules.

- xvii. Desk Verification of the information submitted by the domestic industry and other interested parties was conducted to the extent considered necessary for the purpose of the present review.
- xviii. M/s West Coast Paper Mills Ltd. and M/s Tamil Nadu Newsprint and Papers Ltd. (TNPL) filed information relating to their performance (both injury and costing information), after initiation of the investigation.
- xix. The Non-Injurious Price (hereinafter referred to as 'NIP') has been worked out based on the optimum cost of production and cost to make and sell the subject goods in India based on the information furnished by the domestic industry on the basis of Generally Accepted Accounting Principles (GAAP).
- xx. The submissions made by the interested parties to the extent considered relevant by the Authority have been addressed in these final findings.
- xxi. Wherever an interested party has refused access to or has otherwise not provided necessary information during the course of the present investigations, or has significantly impeded the investigation, the Authority has recorded its observation on the basis of the facts available.
- xxii. The Authority has considered all the arguments raised and information provided by all the interested parties, to the extent supported with evidence and considered relevant to the present review, in the present final findings.
- xxiii. In accordance with Rule 16 of the Rules, the essential facts of the investigation were disclosed to the known interested parties vide Disclosure Statement dated 18th November, 2021 and comments received thereon, considered relevant by the Authority, have been addressed in these final findings. The Authority notes that most of the post disclosure submissions made by the interested parties are mere reiteration of their earlier submissions. However, the post disclosure submissions to the extent considered relevant are being examined in these Final Findings.
- xxiv. *** in these final findings represents information furnished by an interested party on confidential basis, and so considered by the Authority under the Rules.
- xxv. Exchange rate considered for the POI for conversion of USD to Indian Rupees is 1USD = Rs. 74.99.

C. PRODUCT UNDER CONSIDERATION AND LIKE ARTICLE

C.1. Submissions made by other Interested Parties

10. None of the exporters, importers, consumers, and other interested parties have filed any comment or submissions with regard to scope of the product under consideration and the like article.

C.2. Submissions made by the Domestic Industry

11. The domestic industry has made the following submissions with regard to the scope of the product under consideration and like article:
- i. The instant investigation being a sunset review investigation for reviewing the need for continued imposition of the anti-dumping duty in force, the product under consideration remains the same as has been defined in the previous investigation.
 - ii. The product involved in the previous investigations and the present review investigation is uncoated paper in rectangular sheet of following sizes, with permissible limits (a) 210mm x 297 mm also known as A4 size; (b) 297mm x 420mm also known as A3 size; (c) 215mm x 345mm also known as FS or legal size.
 - iii. Subject goods fall within Chapter 48 of the Customs Tariff Act, 1975 under customs sub-headings 4802 of the Customs Tariff Act, 1975. The classification is however indicative only and in no way binding on the scope of the present review.
 - iv. There is no known difference in subject goods produced by the domestic industry and subject goods imported into India. They are comparable in terms of the technical specifications, quality, functions, or end-uses. The two are technically and commercially substitutable. The customers are using the two interchangeably and hence should be treated as like article in accordance with the Rules.

C.3. Examination by the Authority

12. The present investigation is a sunset review and the scope of the product under consideration remains the same as defined in the original investigation. The product under consideration determined in the original anti-dumping investigation vide Final Findings No. 6/32/2017-DGAD dated 30.10.2018 is reproduced herein below:

"6. The Authority has noted submissions made by various interested parties with regard to scope of the product under consideration and like article offered by the DI. With respect to the product under consideration, the Authority notes:

a) The product under consideration for the purpose of present investigation is "uncoated paper in rectangular sheet of following sizes, with permissible limits (a) 210mm x 297 mm also known as A4 size; (b) 297mm x 420mm also known as A3 size; (c) 215mm x 345mm also known as FS or legal size." The product under consideration practically implies cut to size "uncoated copier paper".

b) The product under consideration is generally (but not exclusively) used as a photocopy or copy paper and therefore is popularly known as "copy paper", "copier

paper", "photocopy paper", "multipurpose paper", "uncoated copier paper", "A4 Size Paper", "A3 Size Paper" or "FS Size Paper". It is in the form of finished sheets; weighing in different gsm. It can be a white paper or a punched paper and in different smoothness of the surface.

c) Regarding the PUC, the Authority examined the scope of possible circumvention of any anti-dumping duty, if imposed, by import of copier paper in rolls, reels and large sized sheet and cutting it to size in India. The DI as well as the exporters informed that this was not feasible as copier paper was traded in cut to size and packed sheets. The cost differential between copier paper sold in cut and sized packs and paper imported in rolls was very small, making any cutting and packing operation commercially unviable. Thus, specifically excluded from the scope of the product under consideration are uncoated paper of a kind used for writing, printing, photocopying/copying, other graphic purposes etc. in rolls, reels and large sized sheet (i.e., other than sizes specified above) forms.

d) Product under consideration is classified under customs heading 4802. The customs classification is indicative only and in no way, it is binding upon the product scope."

13. The Authority therefore determined that the PUC in the present investigation shall be the same as in the original investigation. The product under consideration is classified under Customs Tariff sub-heading 4802 of the Customs Tariff Act. This classification is, however, indicative only and in no way binding on the scope of the present investigation.
14. The Authority notes from the information on record that the product under consideration produced by the domestic industry is like article to the goods imported from the subject countries. The product under consideration produced by the Indian industry and imported from the subject countries are comparable in terms of technical specifications, functions or end-uses, product specifications, pricing, distribution & marketing, and tariff classification of the goods. The two are technically and commercially substitutable. The consumers are using the two interchangeably.

D. SCOPE OF DOMESTIC INDUSTRY & STANDING

D.1. Submissions made by other Interested Parties

15. Following submissions have been made by other interested parties:
 - a. The domestic industry was defined in the original investigation as comprising of all three producers namely JK Paper Ltd., West Coast Paper Mills Ltd. and Tamil Nadu Newsprint & Papers Ltd. The same cannot be altered in the sunset review investigation.

- b. Alteration in the constituents of domestic industry will create risk of distortion by way of demonstrating a non-existent injury to the domestic industry. The Authority is required to ensure that such an alteration has not been done to impact the evaluation of injury parameters.
- c. Information provided in the non-confidential version of the application of the domestic industry regarding standing of the domestic industry is insufficient and inconclusive because a broad range of production share is provided.
- d. The applicant domestic industry may have taken a low production quantity of other domestic producers to meet the threshold of major proportion requirement.
- c. Absence of information from West Coast Paper Mills Limited & Tamil Nadu Newsprint and Papers Limited is prejudicial to the interest of the interested parties.

D.2. Submissions made by the Domestic Industry

16. The domestic industry has made the following submissions with regard to the scope of domestic industry and standing:
- i. JK Paper Limited filed the application and post filing of the application, West Coast Paper Mills Ltd. and Tamil Nadu Newsprint and Papers Ltd. (TNPL) supported the application. All requisite information in the prescribed formats along with consolidated Format H for all the three companies have been provided.
 - ii. If the costing information of the other two domestic producers, West Coast Paper Mills Ltd. and Tamil Nadu Newsprint and Papers Ltd., were to be included, then it would increase overall NIP.
 - iii. There is no basis to claim that the scope of domestic industry cannot change in review investigations. There are similar instances in several past cases wherein the scope of the domestic industry changed in review investigations. In the investigation relating to SBR, the original domestic industry ceased operations by the time of review investigation.
 - iv. The argument that the alteration to the composition of the domestic industry would lead to demonstration of non-existent injury to the domestic industry surmises no reference to the facts of the case. The principles of judicial economy require that the Designated Authority considers whether the issue is even relevant to the facts of the present case, rather than looking into a non-existent future possible situation.
 - v. Standing is not a requirement in sunset review investigation. The applicant cannot possibly be aware of the exact figures and once aware of the exact figures of TNPL and West Coast considering their support, the standing was revised accordingly.

The applicant has filed complete information for TNPL and West Coast. Further, Format H aggregate was filed and shared, including revised confidentiality claim.

D.3 Examination by the Authority

17. Rule 2(b) of the Anti-Dumping Rules defines domestic industry as under:

"(b) 'domestic industry' means the domestic producers as a whole engaged in the manufacture of the like article and any activity connected therewith or those whose collective output of the said article constitutes a major proportion of the total domestic production of that article except when such producers are related to the exporters or importers of the alleged dumped article or are themselves importers thereof in such case the term 'domestic industry' may be construed as referring to the rest of the producers".

18. The application has been filed by JK Paper Ltd. Further, the application has been supported by West Coast Paper Mills Ltd. and Tamil Nadu Newsprint and Papers Ltd. Post initiation of the present review, the supporter companies, i.e., West Coast Paper Mills Ltd. and Tamil Nadu Newsprint and Papers Ltd., have submitted the injury and costing information.

19. The production of the applicant i.e. JK Paper Ltd. constitutes ***% of the total domestic production in India. JK Paper Ltd. thus constitutes domestic industry within the meaning of the Rules. Therefore, the Authority has not taken into account the injury information submitted by West Coast Paper Mills Ltd. and Tamil Nadu Newsprint and Papers Ltd in the injury examination. However, since these companies have provided relevant information, the same has been nevertheless separately examined in order to ascertain whether their performance shows materially different position as compared to the applicant domestic industry.

20. The Authority further notes that JK Paper Ltd. has not imported the subject goods during the period of investigation and is not related to any producer or exporter of the subject goods from the subject countries or any importer of the subject goods in India.

21. In view of the above, the Authority holds that JK Paper Ltd. constitutes domestic industry within the meaning of Rule 2(b) of the Rules and satisfies the criteria of standing in terms of Rule 5(3).

E. CONFIDENTIALITY

E.1. Submissions made by other Interested Parties

22. Other interested parties have made the following submissions:

- a. Non-compliance of the domestic industry with Trade Notice has prevented the respondents from assessing, and thereafter, commenting on the situation of the domestic industry as a whole.
- b. The said non-compliance does not become irrelevant in the present case just because the domestic industry has not claimed any injury. It may be appreciated that the word 'continued' in Section 9A(5) and Rule 23(1B) covers a temporal relationship between past and future. Thus, no likelihood analysis can be carried out unless the complete and accurate information for injury is provided.
- c. The applicant has not provided trend of the data/information as per Annexure I of the Trade Notice 10/2018 and has left the parameters blank or claimed them as business sensitive information with no good cause for departure from the requirements of the Trade Notice.
- d. The petitioner has claimed complete confidentiality over Formats A, B, C, D, E, I, J, K, and L. Apart from the actual figures, the petitioner has an obligation to disclose the non-confidential version of the formats containing relevant heads of costs, expenses, time period etc., that was considered by the domestic industry.
- e. The petitioner has failed to provide non-injurious price range in the Petition as per the prescribed +/-10% range in the trade notice and absence of reasonable information in this regard prejudices interested parties as it provides no reasonable estimate of the actual non-injurious price that the domestic industry claims to have calculated.
- f. The range of 30-60% provided in the original petition by the applicant as non-confidential summary of their share in total Indian production and the range of 20-40% subsequently provided in the revised additional submission cannot be considered as an appropriate summary of confidential information permitting reasonable understanding of the substance of information contained therein.

E.2. Submissions made by the Domestic Industry

23. Submission by domestic industry with regard to confidentiality are as follows.

- i. Disclosure of actual information would readily enable one of the domestic industries to judge performance of other two producers. Even domestic competitors would get access to sensitive business information. Despite the trade notice guidelines, the Authority has allowed confidentiality on price parameters in its final

findings where there are three or more producers within the scope of domestic industry.

- ii. There is no prejudice to any interested party and the analysis and ability to comment does not get jeopardized on the ground of non-disclosure of certain volume related information.
- iii. Information claimed confidential by the applicant in any case is similar to the information claimed confidential by other parties as well.

E.3 Examination by the Authority

24. With regard to confidentiality of information, Rule 7 of the Rules provides as follows:

" Confidential information : (1) Notwithstanding anything contained in sub-Rules (2), (3) and (7) of rule 6, sub-rule (2) of rule 12, and sub-rule (4) of rule 15, and sub-rule (4) of rule 17, the copies of applications received under sub-rule (1) of rule 5, or any other information provided to the designated authority on a confidential basis by any party in the course of the investigation shall, upon the designated authority being satisfied as to its confidentiality be treated as such by it and no such information shall be disclosed to any other party without specific authorisation of the party providing such information.

(2) The designated authority may require the party's providing information on confidential basis to furnish non-confidential summary thereof and if, in the opinion of a party providing such information, such information is not susceptible of summary, such party may submit to the designated authority a statement of reasons why summarization is not possible.

(3) Notwithstanding anything contained in sub-rule (2), if the designated authority is satisfied that the request for confidentiality is not warranted or the supplier of the information is either unwilling to make the information public or to authorize its disclosure in a generalized or summary form, it may disregard such information. "

25. Submissions made by the domestic industry and other opposing interested parties with regard to confidentiality, to the extent considered relevant, were examined by the Authority and addressed accordingly. The Authority notes that the information provided by the interested parties on confidential basis was duly examined with regard to sufficiency of the confidentiality claim. On being satisfied, the Authority has accepted the confidentiality claims, wherever warranted and such information has been considered confidential and not disclosed to other interested parties. Wherever possible, parties providing information on confidential basis were directed to provide sufficient non-confidential version of the information filed on confidential basis. The Authority also notes that all interested parties have claimed their business-related sensitive information as confidential.

26. A list of all interested parties was uploaded on DGTR's website along with the request therein to all of them to email the non-confidential version of their submissions to all other interested parties.

F. MISCELLANEOUS ISSUES

F.1. Submissions made by other Interested Parties

27. Views of other interested parties with regard to other issues are as follows:

- i. Hearing held on 11.08.2021 cannot be termed as an effective opportunity of hearing in terms of principles of natural justice, Rule 6 (6) of Anti-dumping Rules and Article 6 of the Anti-dumping agreement because:
 - a. certain information was shared after business hours on 10th August 2021.
 - b. information was still not as per the trade notice. Exemption have been sought on certain critical information such as costs, selling price, profits, cash flow, ROI, interest, depreciation, etc.
 - c. once the case was initiated excluding Thailand, the domestic industry was under obligation to provide updated injury related information excluding Thailand.
 - d. even otherwise, the email of the domestic industry was not marked to all the interested parties.
- ii. The approach adopted to remove Thailand from the subject countries at the stage of initiation has led to a final decision by the Authority even before hearing any party or having any information required for making such determination. The exclusion of a particular country might cause serious prejudice to the exporters from other countries who are competing in the very same market.
- iii. The exclusion of a country or a product at the initiation stage introduces material risks of manipulation and discrimination.
- iv. Anti-dumping duty for limited period of 3 years was deemed appropriate by the Authority instead of the normal duration of 5 years because protection for a limited time period was deemed appropriate to mitigate the injury caused to the domestic industry.
- v. The consolidated information for JK Paper Limited, Tamil Nadu Newsprint Paper Limited and West Coast Paper Mills Limited was not shared with the Respondents before the oral hearing. Selective dissemination of information by the Applicant with certain interested parties is against the principles of natural justice. Information was provided to certain interested parties only after the oral hearing.

F.2. Submissions made by the Domestic Industry

28. Submissions made by the domestic industry with regard to other issues are as follows:

- i. The domestic producers shared the consolidated information on 2nd August 2021 to enable the interested parties to comment on the same even before the Authority takes a call on the composition and scope of the domestic industry. Format H was shared a day prior to hearing after disclosing the volume parameters and giving due justification for claiming the price parameters confidential.
- ii. The applicant had shared all information with all the interested parties on 2nd August 2021 including consolidated information of all the 3 companies via email which included two email IDs of the legal representatives of APRIL Group. Interested parties had sufficient time and opportunity to make comments on the consolidated information of the domestic producers.
- iii. The applicant revised the non-confidential version of the consolidated information and shared such revised information on 10th August 2021 after issues of excessive confidentiality were raised by other interested parties. The applicant did not selectively disseminate information, but due to an error missed sharing the revised submission with APRIL Group. This was rectified and shared immediately, after the hearing.
- iv. DGTR does have the right to decide on the subject countries to be covered in the sunset review investigation. There is no mala-fide in the exclusion of Thailand from the subject countries.
- v. It is illogical to say that since the subject countries have undergone change, the duties also need to undergo change. The import volume has declined, and the export price is unreliable, hence, the duties should be continued as was in existence. The existing duties in force are in the form of benchmark prices which was the NIP determined in the original investigation.
- vi. The period for which duty has been imposed has no bearing on any sunset review investigation and industry cannot be denied the right to seek sunset review and thereby continuation of duties under the Act and Rules. Reference made to the O-acid case to state that the practice is not to conduct sunset review in those cases where original period of levy of duty was less than 5 years is incorrect.

F.3. Examination by the Authority

29. The miscellaneous submissions have been examined as under:

- i. As regards the submission on exclusion of Thailand from subject countries at the stage of initiation, it is noted that the same was excluded because the dumping

margin in respect of exports from Thailand was found to be below de-minimis level. It is further noted that the Authority, prior to initiation of an investigation, is required to undertake a prima facie scrutiny of the application and has therefore the right not to initiate the investigation against a country not found appropriate to be investigated against.

- ii. As regards the submission that original duties were levied only for a period of 3 years and therefore sunset review should not have been initiated, it is noted that sunset review investigation is not contingent upon the period for which the duty was originally levied.
- iii. With respect to submission regarding sharing of consolidated information by domestic industry, it is noted that the consolidated information was made available by the domestic industry to all the interested parties and appropriate opportunity was available with all interested parties to file comments.

G. NORMAL VALUE, EXPORT PRICE AND DETERMINATION OF DUMPING MARGIN

G.1. Submissions made by other interested Parties

30. The submission made by other interested parties with regard to normal value, export price and dumping margin, are as follows:
 - i. The approach to refer only to one single price of a paper product, namely ChameX A4 Copy Paper, to determine normal value for Indonesia is unacceptable. Firstly, the scope of the product subject to this investigation covers a wide variety of copier paper. Secondly, the prices of paper for the same size may also vary for each brand as several factors like quality, margin of profit, product cost etc. influence the pricing of the product.
 - ii. Government of Indonesia questions the applicant's method to depend on Maplitho data for calculating the dumping margin in subject countries, including Indonesia.
 - iii. Claim concerning the existence of a particular market situation in Indonesia is erroneous. The applicant has simply copied the finding of the Australian authority on the anti-dumping investigation on A4 copier paper without providing any information or facts regarding the relevant laws and regulations applicable during the investigation period. Also, the period of investigation of the current case and the past case referred by the applicant is different.
 - iv. Existence of "particular market situation" cannot be examined for the first time in a sunset review investigation in terms of Rule 23(1B).

- v. The Authority has consistently, in the past, decided to examine the issue of ~~availability of raw material at less than adequate remuneration through an anti-subsidy investigation only.~~
- vi. The findings of ADC do not hold any relevance as far as the present investigation is concerned as the duties against Pindo Deli and IK were revoked through Review 547 by ADC. The findings in the said review regarding PMS is of no consequence for them. For APRIL, the ADC noted that its domestic sales are suitable for use in determining normal value and, thus, the same were taken into consideration.
- vii. The WTO Appellate Body in EC-Fasteners has envisaged two conditions where "Particular Market Situation" can be said to exist (i) a complete or substantially complete monopoly of its trade and (ii) where all domestic prices are fixed by the State.
- viii. The domestic industry did not even address the question that even if it were assumed that government policies lower the cost of raw materials in Indonesia, the costs of all the goods, irrespective of the fact that whether the same were for domestic or export market would have got affected.
- ix. Determination of dumping margin and injury margin should be based on the information provided by the Respondents in the EQR, and not based on assertions/assumptions made by the Applicant.
- x. Export price of subject goods reported in the Exporter Questionnaire Responses of participating producers/exporters should be relied upon by the Authority. Customs data of Indonesia cannot be relied on for dumping, injury and likelihood analysis as Indonesia customs data will not reflect prices of exports made via Singapore. Claims that import data of Maplitho paper should be relied on for likely margins is erroneous, as it not PUC and a different product, and no legal basis has been provided for such reliance.
- xi. There is no particular market situation prevailing in the Republic of Indonesia warranting rejection of actual domestic selling price for determination of dumping margin. No PMS was argued in the original investigation. WTO Panel in Australia – Anti-Dumping Measures on Paper noted that the phrase "*particular market situation*" is relevant only if it affects price comparison between normal value and export price. Australian Commission in the review noted that despite PMS a proper comparison is permitted between APRIL's domestic sales and its export sales. Pulp is also raw material for viscose staple fibre, on which SSR has been done by the Authority recently but there was no claim of PMS in the viscose staple fibre SSR case.

- xii. Indonesian exporters have maintained their financial records based on GAAP, and the determination of dumping margin for Indonesian exporters shall be based on the data and information provided by them through the questionnaire response as mandated by the WTO ADA.
- xiii. The reference of the petitioner to an ADC investigation conducted in 2016 was misleading. Although ADD imposition was applied against Indonesia, this imposition does not represent the final and factual condition of the case.
- xiv. The Government of Indonesia refers to the Appellate body EU – Biodiesel case and states that the Applicants' request to adjust the cost and prices in Indonesia with the international price should be disregarded as it is based on a mere assumption that the particular market situation exists in Indonesia and is not supported by any adequate basis.
- xv. The domestic prices of Indonesian producers are suitable to be used in determining normal value since the actual domestic price and export price of Indonesia producers irrefutably permit proper comparison according to Article 2.2 of ADA, and applicant should not have misled the Authority by using Australian investigation as reference.

G.2. Submissions made by the Domestic Industry

- 31. Submissions of the domestic industry with regard to normal value, export price and dumping margin, are as follows:
 - i. The present import price from Indonesia as per DGCI&S data is not reliable and there exists significant difference in the import price of uncoated copier paper and Maplitho paper after imposition of anti-dumping duty. Export price as per Indonesian customs data shows significant difference as compared to prices reported in Indian customs. No justification has been given by any party for this significant difference. Hence, the applicant submits that export price should be determined based on FOB export price reported in Indonesian customs. For likelihood purposes, the import price of uncoated paper in rolls should be considered.
 - ii. Particular Market situation prevails in Indonesia due to various measures taken by the Government of Indonesia leading to artificially low price of raw materials which affects the price comparability between normal value and export price. Further, PMS gives unfair cost advantage to the exporters to sell the subject goods at artificially low prices in home market and provides significant leverage in the international/export market to compete with all other suppliers of those markets.

- iii. PT Pabrik Kertas Tjiwi Kimia Tbk (TBK) has claimed most contents in its EQR ~~confidential which includes information available in the public domain~~ hence, the applicant is prejudiced to comment on the information.
- iv. PT Indah Kiat Pulp & Paper Tbk (IK) has claimed most of their content as confidential in their EQR and hence the applicant is unable to comment on the same.
- v. Most information in the EQR of PT Pindo Deli Pulp and Paper Mills was claimed confidential, hence, the applicant is unable to comment on the same.
- vi. The Australian Commission held that PMS did not permit proper price comparison between normal value and export price for APP Group and that PMS did not impact the price comparison for the APRIL group in another finding. Hence, the price and cost comparability is a fact-based examination for each investigation based on the information relevant for that period. The exporter must establish that PMS does not adversely impact the price comparison.
- vii. The applicant has considered prices published by sellers on various websites to determine Normal Value for Indonesia as no other evidence was available. These prices were considered at retail level and due adjustments were made to come to the actual price prevailing in the subject countries. The same normal value has been considered for Singapore.
- viii. The dumping margin continues to be positive despite imposition of anti-dumping duty.
- ix. Injury is not on account of imports. The import price reported in DGCI&S data is unreliable as it is materially different from the import prices reported in Indonesia and Indian Customs data and Government of Indonesia should show how the importers in India reported higher price when their own data shows much lower price.
- x. According to the EQRs filed, it is evident that the domestic sales declined in the POI, contrary to the Indonesian government's submission that demand is stable and growing. Though imports declined in the POI, the decline in demand globally and in Indonesia would likely add to the surplus capacity of Indonesian producers making India an attractive market in the event of cessation of duty.
- xi. It is for the foreign producers to establish that the prices of paper for the same size vary with factors such as quality, margin of profit, product cost etc. and not Government of Indonesia (GOI). The meaning of quality was not established by GOI nor its impact quantified. Difference in quality, margin of profit, or cost cannot lead to dumping as all these factors equally apply to the normal value and export price.

- xii. Indonesian government is to prove with positive evidence that the facts concluded recently by the USITC, Australian Commission (found to be correct in the WTO Panel report) establishing particular market situation due to various actions and/or policies of the Government no longer exists. In the absence of a contrary proof, it is to be concluded based on evidence available that such a situation continues to exist.
- xiii. There is no basis in the argument that since particular market situation was not claimed in the original investigation PMS cannot be alleged and examined in the sunset review investigation when dumping margin is being determined under Article 2.
- xiv. It is not denied that PMS might lead to countervailable subsidies, but the same does not bar the examination of PMS as subsidy in the form of LTAR. The Australian Authority did not consider export ban on logs as countervailable subsidy, however, considered the same as a relevant parameter for PMS. The duties were not extended against Pindo Deli group in the review investigation as the dumping margin was negligible. The PMS situation affecting price comparability has to be verified based on the facts of the present case.
- xv. The reference to EC Fasteners case is incorrect as the case does not refer to Particular Market situation at all.
- xvi. The domestic industry submits that the lowering of costs by various government policies has impacted only the domestic price and not the export price.
- xvii. The information submitted by the exporters must be critically reviewed in the background of whether the exporters are impacted by Particular Market Situation and such particular market situation affects price comparability and if found to be correct and true to the extent required, the same can be considered for margins.
- xviii. The Authority may kindly verify the prices and expenses charged by the trader in Singapore.
- xix. Price and cost comparability is a fact-based examination for each investigation, based on the information relevant for that period. Therefore, the exporters must establish that the PMS does not adversely impact the price comparison. The Indian Authority cannot simply accept Australian Commission's determination for APRIL group and will have to investigate individually as well.

G.3. Examination by the Authority

32. Under Section 9A (1) (c) normal value in relation to an article means:

(i) *the comparable price, in the ordinary course of trade, for the like article when meant for consumption in the exporting country or territory as determined in accordance with the rules made under sub-section (6); or*

(ii) *when there are no sales of the like article in the ordinary course of trade in the domestic market of the exporting country or territory, or when because of the particular market situation or low volume of the sales in the domestic market of the exporting country or territory, such sales do not permit a proper comparison, the normal value shall be either-*

(a) comparable representative price of the like article when exported from the exporting country or territory or an appropriate third country as determined in accordance with the rules made under sub-section (6); or

(b) the cost of production of the said article in the country of origin along with reasonable addition for administrative, selling and general costs, and for profits, as determined in accordance with the rules made under sub-section (6):

Provided that in the case of import of the article from a country other than the country of origin and where the article has been merely transshipped through the country of export or such article is not produced in the country of export or there is no comparable price in the country of export, the normal value shall be determined with reference to its price in the country of origin.

33. At the time of initiation, the Authority determined the normal value taking into account the evidence placed before the Authority by the domestic industry and which was considered sufficient to initiate the investigation, However, after initiation of the present sunset review, the producers/exporters from the subject countries have filed questionnaire responses and normal value has been determined based on the information received from the producers/exporters from the subject countries.

34. The applicant has alleged existence of particular market situation in Indonesia and has submitted that the costs are required to be adjusted for international price of major input. The applicant has submitted that Government of Indonesia, vide various policies and actions, has influenced and artificially lowered the prices of input material (wood pulp).

35. The Authority notes that the domestic industry has not provided sufficient factual evidence that alleged existence of particular market situation has distorted selling price of uncoated copier paper in the domestic market in Indonesia. The domestic industry has claimed particular market situation due to lower price of raw material arising out of government intervention. However, the domestic industry has not provided any evidence or explanation to demonstrate that the alleged lower prices of raw material wood pulp due to government intervention in Indonesia has led to distorted and lower price of the product in the domestic market. Even if it is considered that the prices of raw material wood pulp are artificially lowered due to government intervention in Indonesia, there is

no evidence to show that this has led to lower prices only in the domestic market and not the export price.

36. Thus, the Authority notes that there is no sufficient evidence on record to reject actual cost of raw material of producers/exporters from Indonesia.
37. The Authority sent questionnaires to the known producers/exporters from the subject countries, advising them to provide information in the form and manner prescribed by the Authority. The following producers/exporters from the subject countries have filed exporter's questionnaire response:
- a. PT. Indah Kiat Pulp and Paper Tbk. ("IK")
 - b. P.T. Pindo-Deli Pulp and Paper Mills ("PD")
 - c. PT. Pabrik Kertas Tjiwi Kimia Tbk. ("TK")
 - d. PT Riau Andalan Kertas ("RAK")
 - e. PT Anugerah Kertas Utama ("AKU")
 - f. PT Asia Pacific Rayon ("APR")
 - g. APRIL International Enterprise Pte. Ltd ("AIE")
 - h. PT Sarana Jaya Andalan, Indonesia ("PT SJA")

Indonesia

Normal Value for PT Riau Andalan Kertas, PT Anugrah Kertas Utama and PT Asia Pacific Rayon, Indonesia, ("Producers") ("APRIL Group")

38. PT Riau Andalan Kertas ("RAK"), PT Anugrah Kertas Utama ("AKU") and PT Asia Pacific Rayon ("APR") are engaged in production of the product under consideration in Indonesia. The three producer companies have provided all the relevant information in requisite formats. The Authority notes that all companies have made sales of the product under consideration in the domestic market during the POI. However, the product under consideration manufactured by only RAK has been exported to India during the POI.
39. The Authority examined the domestic sales made by all the producers and noted that the sales in the domestic market are representative when compared to exports of the product under consideration to India. The Authority has, therefore, decided to determine the normal value based on domestic sales of RAK, AKU and APR.
40. To determine the normal value, the Authority conducted the ordinary course of trade test to determine profit making domestic sales transactions with reference to cost of production of product under consideration. The cost of production of subject goods submitted by the producers was duly verified and the same has been adopted for conducting ordinary course of trade test. The Authority has also examined the details of purchases of raw material (wood pulp) from related parties and satisfied itself regarding the arm's length pricing between the related parties. If profit making transactions are more than 80% then the Authority has considered all the transactions in the domestic market for the determination of the normal value and in case, profitable transactions are less than 80%, only profitable domestic sales are taken into consideration for the determination of

normal value. In this case, based on the ordinary course of trade test, all domestic sales ~~have been taken for determination of normal value, since the profitable sales were more~~ than 80%. RAK, AKU and APR have claimed adjustments for inland transportation, handling and other expenses, ocean freight (one island to another), insurance, credit cost, Rebate/Discount and packing cost and the same have been allowed by the Authority. Accordingly, normal value at ex-factory level for the participating producers has been determined and the weighted average normal value has been determined for APRIL Group as mentioned in dumping margin table below.

Export price for PT Riau Andalan Kertas, PT Anugrah Kertas Utama and PT Asia Pacific Rayon, Indonesia, ("Producers") and their related exporter April International Enterprise Pte Ltd, Singapore, unrelated trader in Indonesia, PT Sarana Jaya Andalan ("PT SJA") and related importer AIE Fiber Resource and Trading (India) Private Limited ("AFRT India")

41. The Authority notes that the subject goods produced by PT Riau Andalan Kertas ("RAK") have been exported to India during POI through two traders namely PT Sarana Jaya Andalan ("PT SJA") & April International Enterprise Pte Ltd ("AIE"). AIE is related to RAK. All exports to India by AIE have been made to related importer AIE Fiber Resource and Trading (India) Private Limited ("AFRT India") who has resold the product under consideration to unrelated customers in India on High Sea Sales basis. PT SJA is not related to RAK and has exported the product under consideration directly to unrelated customers in India. All these companies have provided the relevant information in prescribed formats.
42. It was also noted that in some cases, product under consideration is exported to Singapore on barges and then it is unloaded & loaded in Singapore for exports to India and other countries.
43. The Authority has worked out the ex-factory export price after making adjustments on account of inland freight, port handling charges in Indonesia, credit cost, packing cost, rebate, ocean freight, barging cost, handling expenses in Singapore. The Authority has also made adjustments on account of loss incurred by AIE. The Authority has also examined the profitability of AFRT India and notes that AFRT India has made profits on resale of subject goods to unrelated customers in India. The export price has been determined for APRIL Group as mentioned in dumping margin table below.

M/s PT Indah Kiat Pulp & Paper Tbk, Indonesia, PT Pindo Delhi Pulp and Paper Mills, Indonesia and PT Pabrik Kertas Tjiwi Kimia Tbk, Indonesia ("Producers") ("APP Group")

Normal value

44. From the response filed by producers in APP Group, i.e., M/s PT Indah Kiat Pulp & Paper Tbk, PT Pindo Delhi Pulp and Paper Mills and PT Pabrik Kertas Tjiwi Kimia Tbk,

Indonesia, Authority notes that all companies have made sales of product under consideration in domestic market during the POI. However, due to the reasons mentioned in the export price determination related paragraph below, the Authority holds not to accept the responses filed by APP Group and not to determine an individual dumping margin for APP group.

Export Price

45. From the response filed by producers/exporters in APP Group i.e. M/s PT Indah Kiat Pulp & Paper Tbk (IK) PT Pindo Delhi Pulp and Paper Mills (PD) and PT Pabrik Kertas Tjiwi Kimia Tbk (TK), Indonesia, the Authority notes that only IK has exported the product under consideration manufactured by it to India during the POI. IK has made exports to India directly as well as through unrelated traders during the POI. The Authority notes that the quantum of exports to India through unrelated traders is more than 30% of total exports by IK to India during the POI. These unrelated traders have not participated in the present sunset review investigation and have not filed the exporter questionnaire response with the Authority. Considering the fact that the exports through unrelated non-cooperative traders is more than 30% of total exports by IK to India, the Authority holds not to accept the response filed by APP Group keeping in mind its consistent practice and instead determine the export price on the basis of facts available.

All other non-cooperating producers/exporters in Indonesia

46. The Authority notes that no other producer/exporter from Indonesia has responded to the Authority in the present investigation. In view of non-cooperation, the Authority has determined normal value for all non-cooperating producers as per facts available in terms of Rule 6(8) of the Rules.
47. With regard to export price, in view of non-cooperation of the producers/exporters, the Authority determined export price for all non-cooperating producers as per facts available in terms of Rule 6(8) of the Rules. The normal value and export price for all other non-cooperating producers and exporters of Indonesia is mentioned in the dumping margin table below.

Singapore

48. From the information available on record, the Authority notes that there is no producer of the product under consideration in Singapore. The product under consideration manufactured in Indonesia is sometimes unloaded in Singapore and then exported to India from Singapore. The exporters in Singapore have responded in this investigation. Separate/individual dumping margin has already been determined for these exporters from Singapore along with their concerned producers from Indonesia.

Therefore, there is no requirement for determination of any separate dumping margin for these exporters from Singapore.

Dumping Margin

49. Considering the normal value and export price determined, as explained above, it is noted that the dumping margin is more than the de-minimis limit prescribed under the Rules.

Dumping Margin Table

Producers	Normal Value USD per MT	Export Price USD per MT	Dumping Margin USD per MT	Dumping Margin%	Dumping Margin Range
<ul style="list-style-type: none"> • PT Riau Andalan Kertas • PT Anugrah Kertas Utama • PT Asia Pacific Rayon 	***	***	***	***	35-45%

H. ASSESSMENT OF INJURY AND CAUSAL LINK

H.1. Submissions made by other Interested Parties

50. Submissions made by other interested parties with respect to injury and causal link, are as follows:
- i. The economic indicators of the applicant contradict the presumption of the applicant that the injury still exists. The indicators show that there is no injury to the applicant and other domestic producers. There is no likelihood for injury as gap between imports and sales of domestic producers is too large.
 - ii. Price undercutting only occurred in two periods i.e., 2017-18 and 2019-20. Alleged occurrence of undercutting in 2019-20 can be associated with domestic competition and cannot be attributed to imports.
 - iii. Domestic Industry improved its performance despite the fact that bulk of the POI was hugely affected by the Covid-19 pandemic. There is no linkage between the imports and the performance of the domestic industry in any of the preceding years and the POI.
 - iv. The total imports from the subject countries declined from 86,990 MT in the base year to 21,019 MT in the period of investigation.
 - v. The information pertaining to capacity as submitted by the petitioner is unreliable. Annual reports of 2018-19 and 2019-20 show that domestic industry underwent a capacity expansion in 2018 when it acquired Sirpur Paper Mills, and the capacity increased from 4,55,000 in 2018-19 to 5,91,000 in 2019-20.

H.2. Submissions made by the Domestic Industry

51. Submissions made by the domestic industry with regard to injury and causal link, are as follows:
- i. The dumping margin continues to be positive despite imposition of anti-dumping duty.
 - ii. Demand for subject goods increased throughout the injury period but declined in the POI due to the worldwide slowdown due to COVID pandemic.
 - iii. Import volume from the subject countries declined in the POI post imposition of duties and imports in relative terms followed the same trend.
 - iv. Price undercutting is negative in the POI because of unreliable import price. Considering the export price as per Indonesian customs, price undercutting is heavily positive and imports are likely to undercut the prices of the domestic industry in the event of cessation of duties.
 - v. The prices of subject goods and Maplitho paper are representative of each other when comparison is made at the same measurement unit (MT) as the only minor difference is with the GSM. References made to maplitho are only to (a) assess the credibility of actual import price of subject goods and (b) assess the likelihood of prices of the subject goods, and to display that maplitho's import price are the prices at which subject goods would be sold, if duty ceases to exist.
 - vi. Imports would significantly undercut the prices of the domestic industry, which would depress and suppress the prices and also cause price underselling.
 - vii. Capacity of the domestic industry has remained stagnant over the years, while capacity utilization, production, and domestic sales first increased and then declined in the POI due to decline in demand.
 - viii. Market share of the domestic industry and Indian industry increased, whereas that of the subject imports declined. Inventories declined after imposition of duties but increased in the POI due to decline in demand.
 - ix. Profitability, cash profits, and ROI improved till 2019-20 and declined in the POI, but the profit per unit, cash profits per unit did not decline in POI as compared to the preceding 2 years. Hence, decline in gross profits, cash profits, and ROI was due to Covid and not due to imports.
 - x. Employment remained relatively stable over the injury period, while productivity and wages increased up to 2019-20 and declined in the POI.
 - xi. The decline in imports post imposition of duty and positive dumping margin in such imports implies likelihood of dumping in the event of withdrawal of duty and justifies extension of anti-dumping duty.
 - xii. Sirpur is largely manufacturing maplitho which is not PUC. The company commenced production of PUC only in March 2020. Information pertaining to the Sirpur Mill was ~~not included in the application as it would have meant including all the additional expenses incurred by them as well for commencement of production~~

H.3. Examination by the Authority

52. Rule 11 of the Rules read with Annexure-II provides that an injury determination shall involve an examination of factors that may indicate injury to the domestic industry, taking into account all relevant facts, including the volume of dumped imports, their effect on prices in the domestic market for like articles and the consequent effect of such imports on domestic producers of such articles. In considering the effect of the dumped imports on prices, it is considered necessary to examine whether there has been a significant price undercutting by the dumped imports as compared with the price of the like article in India or whether the effect of such imports is otherwise to depress prices to a significant degree or to prevent price increases, which otherwise would have occurred, to a significant degree. For the examination of the impact of the dumped imports on the domestic industry in India, indices having a bearing on the state of the industry such as production, capacity utilization, sales volume, inventory, profitability, net sales realization, the magnitude and margin of dumping, etc. have been considered in accordance with Annexure II of the Rules.
53. The submissions made by the domestic industry and other interested parties during the course of the investigation with regard to injury and causal link and considered relevant by the Authority are examined and addressed in the present final findings.
54. In consideration of the various submissions made by the interested parties in this regard, the Authority has examined the current injury, if any, to the domestic industry before proceeding to examine the likelihood aspects of dumping and injury.
55. The Authority has taken note of various submissions made by the domestic industry and other interested parties on injury and causal link, and has analyzed the same considering the facts available on record and applicable laws. The injury analysis made by the Authority ipso facto addresses submissions made by the domestic industry and the other interested parties.
56. As regards the argument that capacity submitted by the petitioner is unreliable as the applicant underwent a capacity expansion in 2018 when it acquired Sirpur Paper Mills, the Authority notes that the Sirpur plant was acquired in 2018 and the production started in March 2020. The Sirpur plant largely produced Maplitho paper. The domestic industry has not considered such capacity and nor has it considered any information pertaining to Sirpur plant (including expenses) in the injury information and thus does not affect the injury analysis.
57. Authority notes that the domestic industry was in production and was selling the material even during country wide lockdown. The domestic industry submitted that it stopped production and sales only for a period of 14 days and recommenced both production and sales even during the lock down period. The data filed by the domestic industry shows production and sale in April, May and June, 2020. Nevertheless, the Authority has additionally examined information excluding Covid period (April-June 2020).

Volume Effect of Dumped Imports on the Domestic Industry

a) Assessment of Demand/apparent consumption

58. Demand or apparent consumption of the product in India has been determined as the sum of domestic sales of the Indian producers and imports from all sources.

Particulars	Unit	2017-18	2018-19	2019-20	POI	POI (Excl. covid period)	POI (Excl. covid period) Annualise d
Imports from subject countries	MT	86,990	72,316	64,127	21,019	15,949	21,266
	Indexe d	100	83	74	24	18	24
Imports from other countries	MT	5,433	4,284	3,453	1,865	1,142	1,522
	Indexe d	100	79	64	34	21	28
Domestic Sales of DI	MT	***	***	***	***	***	***
	Indexe d	100	107	104	77	64	85
Domestic Sales of other domestic producers	MT	***	***	***	***	***	***
	Indexe d	100	117	111	84	70	93
Demand	MT	***	***	***	***	***	***
	Indexe d	100	109	104	74	61	82
Imports from subject countries in relation to Consumption (including captive)	%	***	***	***	***	***	***
	Range	10-20	0-10	0-10	0-10	0-10	0-10
Imports from subject countries in relation to total Domestic production	%	***	***	***	***	***	***
	Range	10-20	0-10	0-10	0-10	0-10	0-10

59. It is noted that the demand for the product under consideration increased till 2018-19 and declined thereafter in 2019-20 and further in the POI.

b) Import Volumes from subject countries

60. With regard to the volume of the dumped imports, the Authority is required to consider whether there has been a significant increase in dumped imports, either in absolute terms or relative to production or consumption in India. For the purpose of injury analysis, the Authority has relied on the transaction wise import data procured from DGCI&S. The

import volumes of the subject goods from subject country and share of the dumped import during the injury investigation period are as follows:

Particulars	Unit	2017-18	2018-19	2019-20	POI	POI (Excl. covid period)	POI (Excl. covid period) Annualised
Imports from subject countries	MT	86,990	72,316	64,127	21,019	15,949	21,266
	Indexed	100	83	74	24	18	24
Imports from other countries	MT	5,433	4,284	3,453	1,865	1,142	1,522
	Indexed	100	79	64	34	21	28
Domestic Sales of DI	MT	***	***	***	***	***	***
	Indexed	100	107	104	77	64	85
Domestic Sales of other domestic producers	MT	***	***	***	***	***	***
	Indexed	100	117	111	84	70	93
Demand	MT	***	***	***	***	***	***
	Indexed	100	109	104	74	61	82
Imports from subject countries in relation to Consumption	%	***	***	***	***	***	***
	Range	10-20	0-10	0-10	0-10	0-10	0-10
Imports from subject countries in relation to total Domestic production	%	***	***	***	***	***	***
	Range	10-20	0-10	0-10	0-10	0-10	0-10

61. It is seen that imports from subject countries, in absolute terms, has seen a declining trend since 2018-19. Imports in relation to production and consumption also followed the same trend. Subject imports in both absolute terms and relative terms have declined since imposition of duties.

Price Effect of the Dumped Imports on the Domestic Industry

62. The impact on the prices of the domestic industry on account of the dumped imports from subject country has been examined with reference to the price undercutting, price suppression and price depression, if any. For the purpose of this analysis, the cost of production and net sales realization (NSR) of the domestic industry have been compared with the landed price of imports of the subject goods from the subject country.

a) Price Undercutting

63. Price undercutting information is given in the table below.

Particulars	Unit	2017-18	2018-19	2019-20	POI	POI (Excl. covid period)	POI (Excl. covid period) Annualized
Landed Value	INR/MT	49,550	63,676	62,572	63,961	63,283	63,283
	Indexed	100	129	126	129	128	128
Domestic Selling Prices	INR/MT	***	***	***	***	***	***
	Indexed	100	111	114	109	110	110
Price Undercutting	INR/MT	***	***	***	***	***	***
	%	***	***	***	***	***	***
	% Range	5-15	(5)-5	0-10	(5)-(15)	5-15	5-15

64. It is seen that landed price of imports is above selling price of the domestic industry and are thus imports are not undercutting the prices of the domestic industry. It has been claimed by the domestic industry that the anti-dumping duty imposed on the basis of reference price has prevented the imports from entering the domestic market at low prices.

b) Price Suppression and Depression

65. In order to assess as to whether imports from subject countries were suppressing/depressing the prices of the domestic industry and whether the effect of such imports is to suppress prices to a significant degree or prevent price increases which otherwise would have occurred to a significant degree, the Authority has compared the cost of production and net selling price of the domestic industry over the injury period, and shown in the table below:

Particulars	Unit	2017-18	2018-19	2019-20	POI
Cost of sales	Rs/MT	***	***	***	***
Selling price	Rs/MT	***	***	***	***
Cost of sales	Index	100	97	95	99
Selling price	Index	100	111	114	109

66. It is seen that after imposition of ADD, whereas the cost of sales has remained in similar region, the selling price has increased over the injury period.

Economic Parameters of the Domestic Industry

67. Annexure II to the Anti-Dumping Rules requires that the determination of injury shall involve an objective examination of the consequent impact of dumped imports on

domestic producers of such products. With regard to the consequent impact of dumped imports on domestic producers of such products, the Anti-dumping Rules further provide that the examination of the impact of the dumped imports on the Domestic industry should include an objective and unbiased evaluation of all relevant economic factors and indices having a bearing on the state of the industry, including actual and potential decline in sales, profits, output, market share, productivity, return on investments or utilization of capacity, factors affecting domestic prices, the magnitude of the margin of dumping, actual and potential negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital investments. The Authority has examined the injury parameters objectively considering various facts and submissions made before the Authority.

a) Production, Capacity, Capacity Utilization and Sales

68. Capacity, production, sales, and capacity utilization of the domestic industry over the injury period is given in the following table:

Particulars	Unit	2017-18	2018-19	2019-20	POI		POI (Excl. covid period) Annualized
					POI	(Excl. covid period)	
Installed Capacity	MT	***	***	***	***	***	***
	Indexed	100	100	100	100	75	100
Production-Plant	MT	***	***	***	***	***	***
	Indexed	100	103	108	87	69	91
Production-PUC	MT	***	***	***	***	***	***
	Indexed	100	103	112	88	69	92
Capacity Utilization	%	***	***	***	***	***	***
	Indexed	100	103	108	87	91	91
Domestic Sales	MT	***	***	***	***	***	***
	Indexed	100	107	104	77	64	85

69. It is noted that:

- i. Capacity of the domestic industry has remained constant over the injury investigation period.
- ii. Production, sales and capacity utilisation increased till 2019-20, but declined in the POI.

b) Market Share in Demand

70. Market share of the domestic industry in demand for the product under consideration is given in the table below:

Particulars	Unit	2017-18	2018-19	2019-20	POI	POI (Excl. covid period)	POI (Excl. covid period) Annualised
Imports from subject countries	%	***	***	***	***	***	***
	Indexed	100	76	71	33	30	30
Imports from other countries	%	***	***	***	***	***	***
	Indexed	100	72	61	47	34	34
Domestic Sales of DI	%	***	***	***	***	***	***
	Indexed	100	98	100	104	105	105
Sales of other domestic producers	%	***	***	***	***	***	***
	Indexed	100	107	107	114	109	112

71. It is seen that the market share of the Indian domestic producers as a whole has increased after the imposition of anti-dumping duty, whereas market share of imports from subject country has declined. Market share of Indian domestic producers as a whole is more than 95% during the POI.

c) Inventories

72. Inventory position with the domestic industry over the injury period is given in the table below:

Particulars	Unit	2017-18	2018-19	2019-20	POI	POI (Excl. covid period)	POI (Excl. covid period) Annualised
Inventory	MT	***	***	***	***	***	***
	Indexed	100	48	127	224	224	224
Inventory as No. of days of Production	No	***	***	***	***	***	***
	Indexed	100	46	113	256	243	243
Inventory as No. of days of Sales	No	***	***	***	***	***	***
	Indexed	100	47	128	261	234	234

73. Average inventory level with the domestic industry has increased in the POI due to fall in demand as a result of Covid-19 Pandemic.

d) Profitability, Return on Investment and Cash Flow

74. The profit/loss per unit, return on investment and cash profit during the injury period is indicated in the table below:

Particulars	Unit	2017-18	2018-19	2019-20	POI	POI (Excl. covid period)	POI (Excl. covid period) Ann

Cost of Sales - Domestic	INR/MT	***	***	***	***	***	***
	Indexed	100	97	95	99	99	99
Selling Price- Domestic	INR/MT	***	***	***	***	***	***
	Indexed	100	111	114	109	110	110
Profit	INR/MT.	***	***	***	***	***	***
	Indexed	100	175	207	160	161	161
Profit	Rs. in Lacs	***	***	***	***	***	***
	Indexed	100	187	216	123	103	137
PBIT- Domestic Sales	INR/MT	***	***	***	***	***	***
	Indexed	100	150	174	139	137	137
Cash Profit	INR/MT	***	***	***	***	***	***
	Indexed	100	148	181	203	201	201
PBIT - Domestic	Rs. in Lacs	***	***	***	***	***	***
	Indexed	100	160	182	107	88	117
Cash Profit	Rs. in Lacs	***	***	***	***	***	***
	Indexed	100	158	189	156	129	171
Return on capital employed	%	***	***	***	***	***	***
	Range	10-20	20-30	20-30	15-25	15-25	15-25

75. It is seen that after imposition of anti-dumping duty, the profitability of the domestic industry has improved till 2019-20 and declined thereafter in the POI. However, the ROI in the POI was still higher than base year.

e) Employment, Productivity and Wages

76. The analysis of the number of employees employed by the domestic industry, its productivity and wages paid show as follows:

Particulars	Unit	2017-18	2018-19	2019-20	POI	POI (Excl. covid period)
No of Employees	No	***	***	***	***	***
	Indexed	100	101	102	101	101
Wages	Rs. in Crores	***	***	***	***	***
	Indexed	100	121	134	98	77
	INR/MT	***	***	***	***	***
	Indexed	100	118	119	112	112
Productivity per Day	MT/Day	***	***	***	***	***
	Indexed	100	103	112	88	92

77. There are no significant changes in employment and wages during the injury investigation period.

f) Growth

78. It is seen that the growth of the domestic industry has been positive and it has been able to register an improvement in performance with imposition of duties. The decline in economic parameters of the domestic industry seen in the POI is result of the Covid-19 pandemic and is not attributable to imports.

Particulars	Unit	2018-19	2019-20	POI	POI (Excl. covid period) Annualised
Production- Plant	Y/Y	0-10%	0-10%	(15-25)%	(10-20)%
Production- PUC	Y/Y	0-10%	0-10%	(15-25)%	(10-20)%
Capacity Utilisation	Y/Y	0-10%	0-10%	(15-25)%	(10-20)%
Domestic Sales	Y/Y	0-10%	(0-10)%	(20-30)%	(10-20)%
Profit/Loss per unit	Y/Y	70-80%	10-20%	(15-25)%	(20-30)%
Cash Profit	Y/Y	50-60%	10-20%	(10-20)%	(10-20)%
Return on Capital Employed	Y/Y	50-60%	0-10%	(20-30)%	(10-20)%
Inventories	Y/Y	(50-50)%	160-170%	70-80%	70-80%

g) Ability to Raise Capital Investments

79. There is no impact on the ability of the domestic industry to raise capital investments.

h) Magnitude of Dumping Margin

80. The dumping margin is positive and significant.

i) Magnitude of Injury Margin

81. The Authority has determined the NIP for the domestic industry on the basis of principles laid down in the Anti-Dumping Rules read with Annexure III, as amended. The NIP of the product under consideration has been determined by adopting the information/data relating to the cost of production provided by the domestic industry and duly certified by the practicing accountant for the period of investigation. The NIP has been compared with the landed price from the subject countries for calculating injury margin. For all the non-cooperative producers/exporters from the subject countries, the Authority has ~~determined the landed price based on facts available. It has been claimed that the anti-dumping duty imposed on the basis of reference price has prevented the imports from entering the domestic market at low prices.~~

Injury Margin Table

S. No.	Producer/Exporter from Indonesia	NIP USD/MT	Landed value USD/MT	Injury Margin USD/MT	Injury Margin %	Range%
1.	<ul style="list-style-type: none"> • PT Riau Andalan Kertas • PT Anugrah Kertas Utama • PT Asia Pacific Rayon 	***	***	***	***	Negative

j) Performance of other domestic producers

82. As noted earlier, M/s West Coast Paper Mills Ltd. and M/s Tamil Nadu Newsprint and Papers Ltd. (TNPL) filed information relating to their performance (both injury and costing information) after initiation of investigation. However, since the applicant has sought extension of ADD on the ground of likelihood of recurrence of injury from subject imports, in the event of cessation of ADD, these producers have not been considered as part of domestic industry. It is however noted that these producers have provided certified injury information as shown below:

Particulars	UOM	2017-18	2018-19	2019-20	POI
Production PUC	MT	***	***	***	***
	Index	100	122	124	102
Capacity Utilization	%	***	***	***	***
	Index	100	114	115	85
Domestic Sales Volume	MT	***	***	***	***
	Index	100	123	122	85
Average Stock	MT	***	***	***	***
	Index	100	129	280	1,537
Cost of sales	Rs./MT	***	***	***	***
	Index	100	109	107	119
Selling price	Rs./MT	***	***	***	***
	Index	100	110	115	111
Profit/(Loss)	Rs./MT	***	***	***	***
	Index	100	124	173	45
Profit/(Loss)	Rs.Lacs	***	***	***	***
	Index	100	153	210	38
Cash Profit	Rs.Lacs	***	***	***	***
	Index	100	149	187	86

Return on Capital Employed	%	***	***	***	***
	Index	100	130	198	72

83. It is thus seen that the certified information furnished by West Coast Paper Mills Ltd. and Tamil Nadu Newsprint and Papers Ltd. (TNPL) show a trend similar to that of the applicant domestic industry, JK Paper Ltd. Further, the NIP claimed by these companies is higher than JK Paper Ltd.

Conclusion on current injury

84. It is concluded that the volume of imports has significantly declined during the POI in absolute terms, and in relation to production & consumption. However, the volume of imports still remained substantial and were at a price very close to the reference price/benchmark price fixed for collection of anti-dumping duty in the original investigation. Imports at the prices reported to Indian customs during the POI are not undercutting the domestic industry prices. The domestic industry did not suffer depressing or suppressing effect due to imports on its prices because of the benchmark form of the existing anti-dumping duty. Performance of domestic industry has not deteriorated due to imports over the current injury period. The domestic industry has accordingly not suffered material injury due to subject imports owing to the anti-dumping duty in force.

I. CAUSAL LINK AND OTHER FACTORS

85. The Authority has examined whether other factors listed under the Rules caused injury to the domestic industry.

Volume and value of imports not sold at dumping prices

86. Imports from other countries are not significant in volume and hence cannot be considered as the cause of the injury to the domestic industry.

Contraction in demand or changes in the pattern of consumption

87. Demand for the product under consideration has registered decline during the POI primarily due to ongoing Covid-19 pandemic.

Change in pattern of consumption

88. The pattern of consumption for the product under consideration has undergone a change. Countrywide Covid-19 pandemic has led to increased use of electronic media instead of paper. The consumption of the product under consideration has seen a declining trend with digitisation.

Trade restrictive practices of and competition between the foreign and domestic producers

89. There is no known trade restrictive practice which could have contributed to the injury claimed by the domestic industry.

Developments in Technology

90. Technology for production of the product under consideration has not undergone any change nor is any change likely in the foreseeable future. Developments in technology is, therefore, not a factor of injury.

Export Performance of the domestic industry

91. Injury examination has been conducted for the domestic operations of the applicant.

J. LIKELIHOOD OF CONTINUATION OR RECURRENCE OF DUMPING AND INJURY

92. The Authority notes that this is a sunset review investigation. The domestic industry has claimed that it is not suffering any continued injury and that it is likely to suffer injury in the event of cessation of anti-dumping duty. Accordingly, the Authority has examined the likely scenario of continuation of dumping and recurrence of injury on account of dumped imports, if anti-dumping duty is to be allowed to expire.

J.1. Submissions made by other interested parties

93. Submissions made by the other interested parties on likelihood of continuation or recurrence of dumping and injury are as follows:

- i. Total capacity of subject goods in the exporting country is not the correct criterion to determine the likelihood of dumping and injury to the domestic injury. Total capacity of the responding producers in excess of total sales is to be examined for determining surplus capacity.
- ii. Mere existence of surplus capacity is not sufficient to establish likelihood of continuation or recurrence of dumping and material injury to the Domestic Industry as was stated by the Hon'ble Tribunal in *Indian Spinners Association v. Designated Authority*. The Petitioner must prove that there is a likelihood of diversion of these surplus capacities to India.
- iii. There is no unutilized capacity for the subject goods and the Respondents are already operating at optimum capacity utilization level and therefore there is no scope for utilizing unused capacity to increase exports of subject goods to India. The Respondents also submit that that there is no plan for capacity expansion of subject goods in Indonesia by the producers RAK, AKU and APR.

- iv. The data regarding sales of the Respondents show that there is no scope for diversion of subject goods from domestic market sales or other country sales to India. Export sales to India by Respondents RAK, AKU and APR are insignificant when compared to domestic sales and export sales to other countries during the POI. Respondents are not dependent on India for the sale of subject goods manufactured by them.
- v. The circumstances prevalent for the Respondents with regard to surplus capacity and exports to India necessitate a separate assessment of likelihood of injury for the Respondents.
- vi. In the absence of any present injury, there can be no likelihood of continuation of injury to the domestic injury due to imports of subject goods from Indonesia.
- vii. The decline in performance of the Applicant during the POI would have happened even in the absence of any imports. Such information regarding relevant economic parameters is not reflective of the normal situation and cannot form the basis for determination of actual injury and/or likelihood of continuation of injury.
- viii. Analysis of post-POI data will show that the entire claim of injury and likelihood of injury to the domestic industry is based on an abnormal situation that has prevailed in the six months of the POI.
- ix. It is misleading to conclude that India is Indonesia's only market for paper products. India ranks 8th in the list of top export market destination on Indonesia's paper products and the share of exports to India in 2020 was just 2.6%, much smaller than the exports of Indonesia to other countries during the POI.
- x. Indonesia's exports to most of its main export destination countries showed negative trend after 2018 and there was no diversion of exports to other countries due to imposition of anti-dumping duty by India, hence, there is no indication that Indonesia would divert its exports to India in the event of cessation of anti-dumping duty.
- xi. Reference was made to the Appellate Body in the US – Corrosion-Resistant Steel Sunset Review which considered Article 11.3 and laid down a mandatory rule with an exception and thus imposes a temporal limitation on the imposition of anti-dumping duties. The expiry of duties would not lead to the continuation or recurrence of injury to the Indian domestic industry.
- xii. The gap between imports and consumption increased over the last 2 years and this indicates that the domestic product has heavily saturated India's domestic market and that the domestic producers have taken over a major share of the Indian market. This minimizes the likelihood of recurrence of injury.
- xiii. The presumption that the Indonesian market is declining and therefore the Indonesian producers shifted their target market to India to compensate the declining market in Indonesia is misleading. The Indonesian market for paper product is relatively stable and growing and the Indonesian domestic market conditions does not correlate with injury and likelihood of recurrence of injury as presumed by the applicant.

J.2. Submissions made by the domestic industry

- 94. Submissions made by the domestic industry on likelihood of continuation or recurrence of dumping and injury are as follows:

- i. According the RISI Global Paper Outlook 2019, the producers of the subject goods in Indonesia have high capacities far exceeding the domestic demand. As per Poyry's Report of 2017, the capacity of APP group was estimated at 2.4 Million tons/annum and the capacity of APRIL group as 1.2 Million tons. This capacity is to be seen against the total Indian demand of 0.4 million and total Indian production of 0.5 million tons.
- ii. When the latest production figures and estimated capacity is considered, there will be an unutilized capacity of 0.6 million tons in Indonesia and this unutilized capacity is much higher than the total Indian demand and Indian production.
- iii. According to FAO data, the production in Indonesia has increased despite declining demand in the domestic market. According to RISI report, India is the only key market that registered increasing demand, which naturally led to increasing Indian production. Hence, the increasing Indonesian production is likely to be diverted to India, should duties cease to exist.
- iv. Indonesia is highly export oriented and more than 90% of Indonesian production is being exported. Since, there was a decline in domestic demand in 2018 and 2019, the exports increased during the same period. Further, utilization in the POI has declined for most of the producers which resulted in significant increase in inventories.
- v. There is a decline in demand globally for the subject goods and markets like Indonesia are seeing negative growth in contrast to India which has positive growth. Moreover, Asian market is in a state of over-supply and duty were imposed on Indonesia for the subject goods by three countries indicating a strong likelihood of diversion of subject goods to India, should duty cease to exist.
- vi. Indonesian producers enjoy cost advantage as a result of availability of raw materials at distorted prices and Indonesia is one of the top producers of subject goods in the world.
- vii. Duties were imposed by Australia, USA and Pakistan on the subject goods from Indonesia and Australian Commission has initiated a fresh dumping investigation on A4 Copy paper.
- viii. The likely dumping margin and injury margin considering price of Maplitho paper from subject countries is positive and substantial.
- ix. The export price from Indonesia to top five countries vary significantly. It is as high as 880 USD/MT to as low as 522 USD/MT.
- x. Exports from Indonesia to Australia, Pakistan and USA have been made at dumped and injurious prices. Thus, the price to these countries also shows that the dumping and injury is likely to recur in the event of cessation of duties.
- xi. Decline in demand has caused adverse impact on the performance of the domestic industry but the claim of the domestic industry is that cessation of anti-dumping duty is likely to lead to continuation of dumping and recurrence of injury to the domestic industry which is in a fragile state in view of decline in demand.
- xii. The domestic industry would be forced to reduce the prices of the product concerned significantly in the event of cessation of duty having regard to the likely prices of import of subject goods into India. This would further lead to decline in profits, cash flow and return on investment.

- xiii. Domestic industry is likely to lose its sales volume if it maintains its normal price levels as the consumers would increasingly switch over to the imports and if the domestic industry prefers to lose sales volume, it will result in bigger injury with an increase in inventories, decline in production, utilization and productivity.
- xiv. Removal or anti-dumping duty besides impacting the producing companies, would also impact the 500,000 farmers who are engaged in farm forestry. This would further affect the employment opportunities of the local community in the rural areas, reducing their income and aggravating the rural-urban distress migration.

J.3. Examination by the Authority

- 95. The Authority observes that this is a sunset review investigation and the Authority is conducting a likelihood examination of dumping and consequent injury in the event of cessation of existing anti-dumping duty.
- 96. All factors brought to the notice of the Authority have been examined to determine as to whether there is a likelihood of continuation or recurrence of dumping and injury in the event of cessation of the duty. The Authority has considered various information, as made available by the interested parties during the course of investigation, in order to evaluate the likelihood of continuation or recurrence of dumping or injury.
- 97. There are no specific methodologies available to conduct such a likelihood analysis. However, Clause (vii) of Annexure II of the Rules provides, inter alia for factors which are required to be taken into consideration viz.:
 - i. A significant rate of increase of dumped imports into India indicating the likelihood of substantially increased importation;
 - ii. Sufficient freely disposable, or an imminent, substantial increase in, capacity of the exporter indicating the likelihood of substantially increased dumped exports to Indian markets, taking into account the availability of other export markets to absorb any additional exports;
 - iii. Whether imports are entering at prices that will have a significant depressing or suppressing effect on domestic prices, and would likely increase demand for further imports; and
 - iv. Inventories of the article being investigated.
- 98. Further, the Authority has also examined other relevant factors having a bearing on the likelihood of continuation or recurrence of dumping and consequent injury to the domestic industry.

- i. **Continued & existing dumping**

PAGE NO

99. The Authority notes that dumping of product under consideration has continued from ~~subject countries. The dumping margin determined for responding exporters is positive~~ and substantial. In fact, the dumping margin determined in the present investigation is higher than the dumping margin determined at the time of original investigations. Thus, the exporters are resorting to dumping despite measures in place and is indicative of likely dumping in the event of cessation of duties. The Authority notes that combined production and exports of the two responding producers is significantly high. The domestic industry submitted that these responding producers represent the entirety of Indonesian capacities for the product. None of these responding producers have provided any justification or evidence why dumping in significant volumes would not resume in the event of cessation of ADD. Further, the evidence on record establishes that the volume of dumped imports would resume in significant volumes in the event of cessation of ADD. The contention of the domestic industry that the export price of the producers is significantly lower than the export price of the traders eventually exporting the product to India has also remained uncontroverted.

ii. Volume of imports of subject goods from subject countries

100. The Authority notes that imports from the subject countries have declined significantly after the imposition of anti-dumping duty. The price at which the producers have sold the material to respective traders, the price at which subject goods have been exported to a number of countries and the extent of unutilised capacities collectively demonstrate that the volume of imports is likely to increase significantly in the event of cessation of duty.

iii. Surplus capacity in Indonesia

101. The Authority notes that the domestic industry has provided information from Poyry's Report, RISI Report and data extracted from Food and Agricultural Organisation (FAO). Based on the information provided in these Reports, the domestic industry reported that the unutilised capacity in Indonesia for product under consideration is approximately 6 lakh tonnes during the POI, which exceeds the gross Indian demand.

iv. Surplus capacity with cooperating producers in Indonesia

102. Indonesia is one of the largest producers/exporters of the subject goods. The aggregate information with regard to surplus capacity held by participating producers from Indonesia is as under:

Particulars (APRIL Group)	Unit	Total
Total Installed Capacity	Ton/Year	***
Total Production	Ton/Year	***
Capacity Utilisation Percentage	%	***
Capacity Utilisation Percentage Range	%	95-105

Particulars (APP Group)	Unit	Total
Total Installed Capacity	Ton/Year	***
Production Quantity	Ton/Year	***
Capacity Utilisation Percentage	%	***
Capacity Utilisation Percentage Range	%	60-70

Particulars	Unit	Total
Demand in Indonesia*	MT/year	***
Capacity (APRIL +APP)	MT/year	***
Surplus capacity	MT/year	***
Surplus capacity	Range	(20,00,000-30,00,000)

*Source: Questionnaire response filed by APP Group

103. It is seen that:

- i. the capacities established by the producers is significantly more than the domestic demand. The surplus capacity is 9 times of the demand prevailing in Indonesia.
- ii. While APRIL group's capacity is fully utilised, the APP group, which has higher capacities, has significant unutilised capacities. The surplus capacity with APP Group alone is higher than the gross Indian demand for the product.

v. High export orientation of producers

104. The Authority notes that a significant portion of the capacity for the subject goods in Indonesia is meant for export markets. The aggregate information with regard to domestic sales and export sales by participating producers from Indonesia is given below.

Sales Quantity - PUC (APP Group)	MT	Total	Share of Sales in Percentage	Range
(a) Domestic Sales - PUC	MT	***	***	5-15%
(b) Export Sales - India - PUC	MT	***	***	0-10%
(c) Export Sales - Other Countries - PUC	MT	***	***	85-95%
(d) Total Sales	MT	***	100%	100%

Sales Quantity - PUC (APRIL Group)	MT	Total	Share of Sales in Percentage	Range
(a) Domestic Sales - PUC	MT	***	***	10-20%
(b) Export Sales - India - PUC	MT	***	***	0-10%
(c) Export Sales - Other Countries - PUC	MT	***	***	85-95%
(d) Total Sales	MT	***	100%	100%

105. It is seen that the exports to other countries by the producers in Indonesia is in the range of 85-95%. Thus, the producers are highly export oriented. Further, these producers are selling to a number of third countries at a low price.

i. Trade remedial measures imposed by other countries on Indonesia

106. As per information available on record, it is noted that trade remedial measures have been imposed by the United States of America (USA), Australia and Pakistan on the product under consideration exported from Indonesia. This shows that the producers in the subject country have been dumping goods in other countries and causing injury to the domestic industry of such countries. It also indicates that these markets (US, Australia and Pakistan) remain restricted for producers in Indonesia, thus, making the possibility of diversion of their surplus capacities to Indian market even greater in the event of cessation of duties.

ii. Inventories with participating producers/exporters from Indonesia

107. The aggregate information with regard to inventories held by participating producers from Indonesia is given below.

Inventories	Unit	Total	Range
APRIL Group	MT	***	10,000-20000
APP Group	MT	***	90,000-100000

108. The inventory level is significant. The inventory level alone is 22% of the total Indian demand.

iii. Price attractiveness of Indian market

109. The aggregate information furnished with regard to export sales to India and third countries by participating producers from Indonesia is given below.

FOR POI	Unit	Customs data	APP	April
Third Country volume	MT	14,76,878	***	***
Third country rate				
Producer's price	\$/MT	691	***	***
Exporter's price	\$/MT		***	***
Volume of exports to third countries below				
DI selling Price	MT	***	***	***
NIP for the DI	MT	***	***	***
Foreign producer's export price to India	MT		***	***
Indian Demand for POI	MT	***	***	***
Volume of exports to third countries below (as % of Indian demand)				
DI selling Price	%Range	230-240%	80-90%	100-110%
NIP - DI	%Range	60-70%	10-20%	100-110%

Exporter export price to India	%Range	100-110%	100-110%
--------------------------------	--------	----------	----------

110. It is seen from the table above that:

- a. Export price from producers of APP group to other countries are at higher price as compared to the export price of the producers of APRIL group. However, there are significant differences in the prices reported by the producers and exporters. Further, whereas APRIL group has fully utilised its production capacities, APP Group holds unutilised production capacities beyond the Indian demand.
- b. The combined volume of exports made at price below the level of selling price prevailing in India, as per information provided by the producers in Indonesia, is *** MT and amounts to almost ***% of Indian demand
- c. The combined volume of exports made at price below the level of non-injurious price prevailing in India, as per information provided by the producers in Indonesia, is *** MT which amounts to almost ***% of Indian demand.
- d. The combined volume of exports made at price below the level of price at which exports have been made to India, as per information provided by the producers in Indonesia, is *** MT and amounts to almost *** % of Indian demand.
- e. Response by Indonesian producers/ exporters also shows significant variation between export prices to various countries.
 - i. The unutilised capacity with the APP group is more than the gross Indian demand and therefore are in itself sufficient to cater to the entire demand for the product in the country.
 - ii. While April group is fully utilised as far as its capacity is concerned, it is seen that its export price to India during the investigation period was materially below the selling price, cost of production and NIP of the domestic industry.
 - iii. Further, considering the low-priced volume of exports by the company to other countries, the company is capable of taking away significant portion of Indian demand by diverting their third country exports to Indian market in the event of cessation of anti-dumping duty.

It is thus seen that the Indian market is high price attractive to the subject foreign producers and cessation of duties is likely to lead to diversion of significant third countries exports to Indian market.

Conclusion on Likelihood of Dumping and Injury

111. Considering the information on record, and after due examination of the evidence on record, the Authority concludes that:

- i. Even when volume of imports has declined in the current period, the dumping has continued from the subject countries and the margin of dumping is also quite significant. In fact, the dumping margin has increased.

- ii. The responses filed by the responding producers show that there are significant ~~unutilised capacities available with APP group, sufficient enough to cater to~~ the entire Indian demand.
- iii. Significant exports to third countries have been made by participating producers/ exporters at prices below the level of export prices to India, Indian domestic selling price and non-injurious price of the domestic industry.
- iv. Significant quantum of third country exports have been made at prices below the level of export price to India, Indian domestic selling price and Indian non-injurious price. Thus, significant exports can be diverted to India at injurious price.
- v. Both the producers are highly export oriented. The domestic demand in Indonesia can hardly meet 10% of installed capacities. The foreign producers have maintained significant inventories.
- vi. Various parameters collectively and cumulatively thus establish that the subject imports are likely to increase significantly at dumped and injurious prices in Indian market in the event of cessation of the existing ADD, leading to likelihood of continuation of dumping and recurrence of injury to the domestic industry.

K. POST-DISCLOSURE COMMENTS

Submissions of other interested parties

112. Other interested parties have reiterated their submissions with regard to determination of normal value, injury and causal link and likelihood of continuation or recurrence of dumping and injury. Additionally, the following submissions have been made:
- a. The landed prices are higher than the non-injurious price of the Domestic Industry. In view thereof, the Authority should consider the export price and landed value of participating producers/ exporters and provide individual dumping margin and injury margin.
- b. Authority should give due consideration to the difficulties experienced by interested parties in supplying the information in terms of Article 6.13. However, in the instant investigation, the Authority has not given any due cognizance of the fact that producer cannot compel unrelated exporters to participate in the investigation. The Authority has also not provided the legal basis or logic under the Anti-Dumping Rules or Anti-Dumping Agreement to reject the response on such basis. The Appellate Body of WTO has held that the Authority has to give due consideration to the difficulty faced by the responding exporter in supplying some information. The Appellate Body also emphasized that cooperation is a two-way process, stated that the investigating authority are not entitled to insist upon absolute standards or impose unreasonable burden upon the exporters.
- c. The exporter requested re-consideration of their data as they have done their due diligence by requesting unrelated exporters to participate in the investigation.

0065 50
24/3/2022

Therefore, now for their non-corporation, DGTR should penalize responding exporters.

- d. Since the current investigation is a sunset review investigation, the Authority is required to reach to a determination about likely prices of the subject goods and also about the likelihood of dumping and injury. Therefore, the Authority should consider their direct prices recovered from Indian market.
- e. While considering capacity and capacity utilization, the Authority has not discounted covid impact for exporters during POI. This has resulted in misleading likelihood analysis as far as it related to excess or surplus capacity.
- f. Even if only JK Paper Ltd. is treated as a constituent of the domestic industry, the Authority should nevertheless verify the information submitted by West Coast Paper Mills Ltd. and Tamil Nadu Newsprint and Papers Ltd and thereafter consider the same for objective assessment of material injury and likelihood of continuation or recurrence of injury to the domestic industry as a whole.
- g. The observations of the Authority indicate absence of injury and likelihood of injury to the domestic industry due to import of subject goods from the subject countries.
- h. The decline in production, sales and capacity utilisation in POI is because of a decline in demand in India in the POI due to Covid-19 pandemic and not due to the imports. This should be clearly noted as reason for the decline in these volume parameters in the final findings.
- i. If the Authority concludes in the final findings that anti-dumping duty is to be recommended, the Authority is required to consider the lower of injury margin and dumping margin determined in the disclosure statement while recommending the duty in accordance with lesser duty rule.
- j. Even if anti-dumping duty is continued on exports of subject goods made from Indonesia and Singapore pursuant, the Authority should determine that no anti-dumping duty is required to be continued on exports made by APRIL Group.
- k. There is no likelihood of dumping and injury to domestic industry due to import of subject goods from APRIL group because the Authority has noted that:
 - (i) There has been a significant decline in the imports of subject goods from subject countries after the imposition of anti-dumping duty.
 - (ii) There is no surplus capacity available with the Respondents.
 - (iii) Respondents only have inventories in the range of 10,000-20,000 MT available with them. This is insignificant as compared with the Indian demand.
 - (iv) Majority of exports by Respondents are to third countries. Export sales to India by Respondents are insignificant when compared with export sales to other countries. There are no factors indicating diversion of these exports from third countries to India. There is no surplus capacity or inventory available with the Respondents that can be put to use to increase exports to India if the anti-dumping duty is withdrawn by India.
- l. The claim of surplus capacity of 0.6 million tonnes is incorrect. Actual capacity of participating producers/exporters in the subject investigation namely, APRIL group and APP group is required to be considered for assessing existence of surplus capacity in Indonesia.

- m. Export price to third countries has remained higher than export price to India during all three years prior to the POI. Export price to India in the POI is higher due to special circumstances prevailing in 2020. There is no trend showing that Indian market is price attractive.
- n. There has been no request either from participating producers/exporters from subject countries or from the domestic industry to examine price attractiveness by comparing volume of exports to third countries at low prices with Indian demand.
- o. This analysis has not been undertaken by the Authority in any of the earlier sunset review investigations. Such examination has also not been suggested by any court or tribunal in India as a relevant counter-factual assessment in sunset review investigation for determining the likelihood of dumping and injury.
- p. It is not relevant to determine price attractiveness of Indian market based on a simple comparison of export sales to third countries with Indian demand without further context regarding likelihood of diversion of exports from third countries to India.
- q. The Authority must examine the post-POI data of JK Paper Ltd. and other domestic producers in India. There is substantial improvement in overall profitability of these paper producers in the post-POI period.
- r. If the Authority concludes that anti-dumping duty should be recommended for further period on all exports from Republic of Indonesia and Republic of Singapore, Respondent requests the Authority to consider that original anti-dumping duty was recommended for a period of 3 years instead of full 5 years period and therefore antidumping duty should not be continued for more than 3 years pursuant to the sunset review.
- s. If the Authority recommends continuation of anti-dumping duty, Respondent also requests the Authority to recommend reference price-based duty as done in the original investigation but after reducing the level of reference price from the present USD 855.01 per MT to the level of NIP determined in the subject investigation.

Submissions made by the domestic industry

113. The domestic industry has reiterated its earlier submissions with regard to likelihood of recurrence of injury and public interest, and in addition has submitted as follows in its comments to the Disclosure Statement.
- a. The import price from Indonesia reported in DGCI&S is unreliable considering significant difference in the import price reported to the Indian customs and Indonesian customs. Uncoated paper in rolls was earlier being imported at a price Rs. 3,472 pmt lower than Uncoated paper in sheet, with imposition of antidumping duty, the product is now being imported at a price Rs. 9698 cheaper than Uncoated paper in sheet. This clearly shows unreliability of the import price. The difference between CIF and FOB price is to the tune of 250 USD/MT. This difference amount is very high and unattributed to the traders' margins. The Authority considering huge discrepancy in data should determine export price based on prices reported by the producers.
- b. Considering the Authority's observation in the previous investigation that significant volume of imports is being reported as originating in Singapore even though there is no manufacturing in Singapore, the Authority is requested to kindly fully reconcile the

- imports reported as originating in Singapore in the questionnaire responses of participating producers and Indian customs data.
- c. The present duty needs to be extended without modification since the dumping and injury to the domestic industry is based on the likelihood of dumping and injury to the domestic industry.
 - d. The Authority failed to consider submissions by domestic industry concerning (a) declining demand in Indonesia and globally; (b) likely dumping and injury margin from Indonesia; (c) cost advantages with exporters in Indonesia.
 - e. The non-injurious price determined is too low resulting into insufficient injury margin. Further, the Authority has reduced the non-injurious price on account of number of factors without sufficient disclosure thus not allowing the domestic industry to make any effective comments.
 - f. Highest utilization should not be considered as optimum for determination of NIP. If the domestic industry has been able to produce beyond 100%, making that actual capacity utilisation as the norm is penalising efficient industries and dubbing them inefficient for subsequent lower utilisation.
 - g. The Authority is requested to disclose various facts in non-confidential version, such as (a) copy of communications sent by the Authority and copy of replies filed by the interested parties; (b) submissions by interested parties; (c) copy of rejoinder submissions; (d) disclosure of exports to third countries; (e) full disclosure of NIP.
 - h. The absence of duty will also impact the large number of farmers engaged in growing plantations of Eucalyptus, Subabul, Casuarina, Acacia, Poplar, etc. The domestic industry is fully competent to cater to the entire Indian demand of the subject goods. There are large number of producers of subject goods in the domestic market and capacities with the Indian industry is largely unutilized. Currently, imports of the subject goods from Indonesia attract NIL rate of duty. Therefore, in a situation where NIL duty exists, the impact of ADD on the consumer will be minimal while providing a level playing field to the domestic industry. None of other interested parties have claimed or substantiated any adverse impact of duty.

Examination by the Authority

114. The Authority notes that some of the submissions by the domestic industry and other interested parties are repetitive in nature. These submissions have already been examined at appropriate places in the Final Findings. Further, the Authority has examined the additional submissions of the interested parties as under:

- i. As regards the argument that rejection of response of APP group is not correct, it is noted that the quantum of exports to India through non-participating unrelated traders is substantial and therefore Authority found it appropriate not to accept the response filed by APP Group as per the consistent practice followed by the Authority and instead determined the export price on the basis of facts available.
- ii. As regards the argument that covid period adjustment has not been done for the exporters, it is noted that there is no data provided with regard to quantification of impact of Covid19 by the exporters themselves.
- iii. As regards the argument that there is no likelihood with respect to APRIL group, the Authority notes that even though the capacities with the APRIL group have

been fully utilized, there is significant gap between the export prices reported by the producers of APRIL group and their traders, thus demonstrating the leverage available to the producer to export at dumped and injurious price. The producer's export price to third countries for significant volumes are at low price and below the level of selling price and NIP of the domestic industry. Thus, high export orientation and third country export prices of APRIL group indicate likelihood of diversion of exports of subject goods from other countries to India at injurious prices and consequent recurrence of injury to the domestic industry in the event of cessation of ADD.

- iv. As regards the argument that post POI data should be examined as the domestic industry has improved its performance, it is noted that since there is enough evidence on record to establish the likelihood of continuation of dumping and recurrence of injury, it was not deemed necessary to examine post-POI data.
- v. As regards the argument that NIP determined is low, it is noted that NIP has been determined as per Annexure III of the Rules and is consistent with the past practice of the DGTR.
- vi. As regards the submission of opposing interested parties that the duties should be extended only for three years as was done in the original investigation, the Authority notes that no justification has been given for limiting duties to three years. The mere fact that the duties were earlier recommended for three years in itself does not imply that the present extension should also be for three years only. In any case, the interested parties are free to seek review of duties, if they consider that there is no justification for continued imposition of ADD.
- vii. As regards furnishing of transaction wise import data, it is clarified that APP Group has provided the said information was not furnished initially in the exporter's questionnaire response but has subsequently been provided during desk verification.

L. INDIAN INDUSTRY'S INTEREST AND OTHER ISSUES

115. Authority considered whether imposition of proposed ADD shall have adverse public interest. For the same, the Authority examined whether the imposition of the proposed duty on imports of the product under investigation would be against the larger public interest. This determination is based on consideration of information on record and interests of various parties, including domestic industry, importers and consumers of the product.
116. The authority issued gazette notification inviting views from all interested parties, including importers, consumers and other interested parties. Authority also prescribed a questionnaire for the consumers to provide relevant information with regard to present

investigations, including possible effect of ADD on their operations. The duties have been in force since 4th December, 2018.

117. From the information on record, it is noted that imports have occurred above the reference price during the period of investigation and no burden of antidumping duty has been faced by the users. The subject goods do not have a downstream industry and is largely used by public at large. The Authority has assessed the impact of current level of ADD on the end consumers. It is noted that the impact on the end consumer at the current level of anti-dumping duty is approximately 0.64% of average selling price of the product.
118. There are other alternate sources of supply of subject goods. Countries such as Thailand, USA, Australia, Vietnam and Malaysia are other manufacturers of subject goods, wherefrom imports can be sourced in case of demand-supply gap.
119. The Authority notes that fair competition in the Indian market will not be reduced by the continuation of the anti-dumping measures. On the contrary, continuation of anti-dumping measures would remove the unfair advantages gained by dumping practices and prevent the decline of the domestic industry and help maintain availability of wider choice to the consumers of the subject goods.
120. The purpose of anti-dumping duties, in general, is to eliminate injury caused to the domestic industry by the unfair trade practices of dumping so as to re-establish a situation of open and fair competition in the Indian market, which is in the general interest of the country. From the information submitted by the domestic industry, it is noted that the imposition of duties has benefitted the producers of the subject goods.

M. CONCLUSION

121. Having regard to the contentions raised, information provided, submissions made and facts available before the Authority as recorded in these findings and on the basis of the determination of dumping and consequent injury to the domestic industry made hereinabove, the Authority concludes that:
 - a. The applicant domestic producer constitutes domestic industry under Rule 2(b) of the Rules and the application filed by the applicant on behalf of domestic producers satisfies the criteria of standing in terms of Rule 5(3) of the Rules. Since the application is based on likelihood of dumping and injury, West Coast Paper Mills Ltd. and Tamil Nadu Newsprint and Papers Ltd have not been included in the scope of domestic industry.
 - b. The product under consideration continues to be exported to India at prices below normal value resulting in continued dumping. The volume of imports has declined because of antidumping duty. However, the volume of import is likely to increase significantly, considering the dumped and injurious price at which goods have been exported from Indonesia to third countries, high export orientation, significant surplus capacities in Indonesia. It is evident that the dumping of the product is likely

to continue and the volume of imports is likely to increase significantly in the event of cessation of anti-dumping duties.

- c. The volume of imports has significantly declined in absolute terms, and in relation to production & consumption in India. Imports were not undercutting the domestic industry prices & the domestic industry did not suffer depressing or suppressing effect on its prices due to the existing antidumping duty. Further, performance of domestic industry has not deteriorated over the current injury period, and the domestic industry has not suffered material injury due to subject imports owing to the anti-dumping duty in force.
- d. In event of expiry of anti-dumping duty, there is clear possibility of dumping in significant volumes and consequent injury to the domestic industry. Indonesia is one of the largest producers of the subject goods. There are significant unutilized capacities in Indonesia, sufficient to cater to entire Indian demand. Significant exports to third countries have been made by the producers at prices below the level of selling price, non-injurious price of the domestic industry and third country prices. It is also seen that various countries have imposed trade remedial measures on subject goods from Indonesia.
- e. There is thus likelihood of continuation of dumping and recurrence of injury to the domestic industry considering (a) sufficient surplus capacity (b) high export orientation of Indonesian producers (c) the significant quantum of injurious exports to third countries (d) price attractiveness of Indian market and (e) trade remedial measures imposed by other WTO member countries on imports of subject goods from Indonesia.

N. RECOMMENDATIONS

122. The Authority notes that the sunset review was initiated and notified to all the interested parties and adequate opportunity was given to the domestic industry, exporters, importers/ users and the other interested parties to provide information on the aspects of dumping, injury and causal link and the likelihood of continuation or recurrence of dumping and injury. Having initiated and conducted the sunset review into dumping, injury and causal link and the likelihood of continuation or recurrence of dumping and injury in terms of the provisions laid down under the rules, the Authority is of the view that continued imposition of anti-dumping duty is required on the subject goods from the subject countries.
123. Under these circumstances, the Designated Authority considers it appropriate to recommend continuation of existing quantum of anti-dumping duty on the imports of subject goods from subject countries. The Authority, thus, considers it necessary to recommend continuation of existing definitive anti-dumping duty imposed vide Notification no. 56/2018-Customs dated 4th December 2018 for further period of two (2) years from the date of notification to be issued in this regard by the Central Government, as the difference between the landed value of the subject goods and the amount indicated

in Col. 7 of the duty table appended below, provided the landed value is less than the value indicated in Col 7.

DUTY TABLE

S N	Heading/ Sub- heading	Description of Goods	Country of Origin	Country of Export	Producer	Amount (US\$/MT)
1	2	3	4	5	6	7
1	4802*	Uncoated paper in rectangular sheet of following sizes, with permissible limits (a) 210mm x 297 mm also known as A4 size; (b) 297mm x 420mm also known as A3 size; (c) 215mm x 345mm	Indonesia	Any country including Indonesia.	a) PT Riau Andalan Kertas b) PT Anugrah Kertas Utama c) PT Asia Pacific Rayon	855.01
2	- do -	- do -	Indonesia	Any country including Indonesia.	Any combination other than S. No.1	855.01
3	- do -	- do -	Any country other than Indonesia	Indonesia/ Singapore	Any	855.01

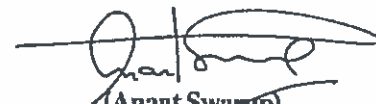
** Custom classification is only indicative and the determination of the duty shall be made as per the description of PUC.*

124. Landed value of imports for the purpose of this Notification shall be the assessable value as determined by the Customs under the Customs Act, 1962 (52 of 1962) and includes all duties of customs except duties under sections 3, 88,9 and 9A of the customs Tariff Act, 1975, as amended from time to time.

✓

O. FURTHER PROCEDURE

125. An appeal against these findings after its acceptance by the Central Government shall lie before the Customs' Excise and Service tax Appellate Tribunal in accordance with the Customs Tariff Act, 1975 as amended in 1995 and Customs Tariff Rules, 1995.


(Anant Swarup)
Designated Authority

STANDARD
STANDARD

()

⊖

THE

Annexure-G

FILE NO

THE UNIVERSITY OF CHICAGO

PHYSICS DEPARTMENT

PHYSICS 351

LECTURE 1

MECHANICS

1.1

1.2

1.3

1.4

<https://www.statista.com/statistics/1052855/thailand-export-value-of-pulp-paper-and-prints-by-quarter>

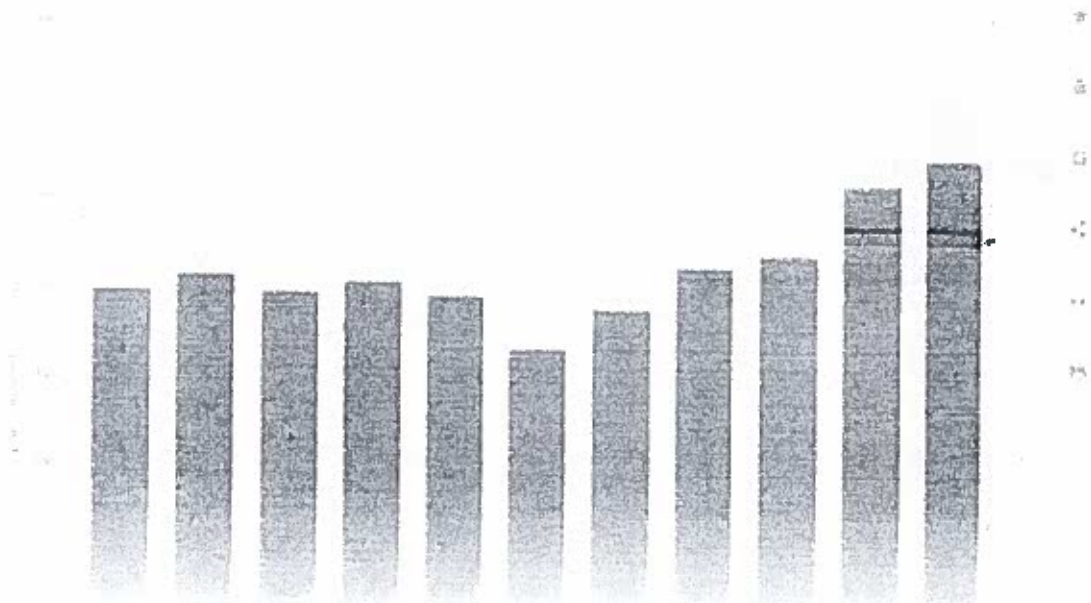
Export value of pulp, paper, and prints Thailand Q1 2019-Q3 2021

Published by Statista Research Department, Dec 14, 2022

In the third quarter of 2021, the export value of pulp, paper, and print media in Thailand amounted to approximately 649 million U.S. dollars, which was an increase compared to the previous quarter. The main trade partners for this product segment include the United States and China.

Export value of pulp, paper, and print media in Thailand from 1st quarter 2019 to 4th quarter 2020

(in million U.S. dollars)



© Statista 2022

© Statista 2022

© Statista 2022

PAGE NO

[Additional Information](#)

© Statista 2023

[Show source](#)

Sources

- [Show sources information](#)
- [Show publisher information](#)
- [Use Ask Statista Research Service](#)

Release date

February 2022

Region

Thailand

Survey time period

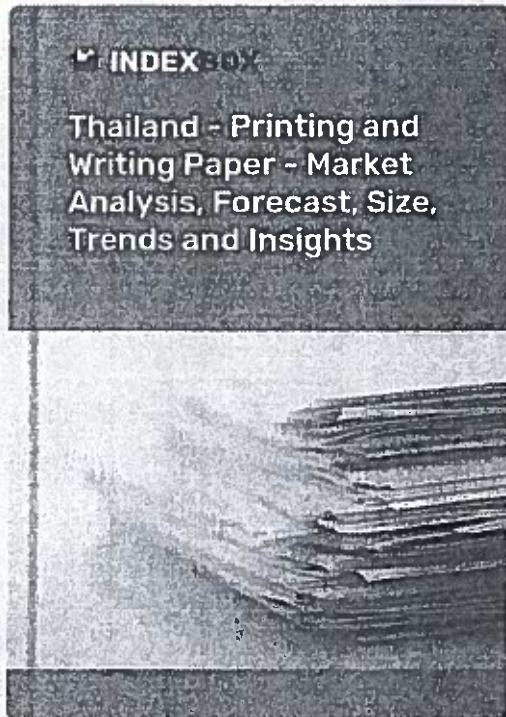
Q1 2019 to Q3 2021

Citation formats

- [View options](#)

INDEXBOX

Store → Wood and Paper Products → Pulp, Paper and Paperboard → Printing and Writing Paper



Report Update: Nov 1, 2023

Thailand - Printing and Writing Paper - Market Analysis, Forecast, Size, Trends and Insights

Single report

Sent by email within 24h (Mon-Fri)

- \$499**
Basic Edition
- \$1995**
Professional Edition

What's the difference?

Buy the report

Subscription

Online access and download

from **\$280/month**

Get instant access to more than 2 million reports, dashboards, and datasets on the IndexBox Platform.

Have a question?
Ask me! **PAGE NO**

Key Stats Description Table of Contents

We use cookies to improve your experience and for marketing. Read our [cookie policy](#) or [manage cookies](#).

[Accept essential cookies](#)

[Accept all cookies](#)

INDEXBOX

Market Size for Printing and Writing Paper in Thailand

The Thai printing and writing paper market declined markedly to less than \$X in 2022, which is down by 99.9% against the previous year. In general, consumption, however, recorded a notable increase. As a result, consumption attained the peak level of \$X. From 2021 to 2022, the growth of the market failed to regain momentum.

Production of Printing and Writing Paper in Thailand

In value terms, printing and writing paper production declined dramatically to less than \$X in 2022 estimated in export price. In general, production, however, enjoyed a slight expansion. The growth pace was the most rapid in 2020 with an increase of 20%. As a result, production attained the peak level of \$X. From 2021 to 2022, production growth failed to regain momentum.

Exports of Printing and Writing Paper from Thailand

Exports from Thailand

PAGE NO



X

Have a question?
Ask me!

INDEXBOX

failed to regain momentum.

In value terms, printing and writing paper exports soared to \$X in 2022. Overall, exports, however, showed a relatively flat trend pattern. The exports peaked at \$X in 2019; however, from 2020 to 2022, the exports stood at a somewhat lower figure.

Exports by Country

Vietnam (X tons), South Korea (X tons) and China (X tons) were the main destinations of printing and writing paper exports from Thailand, together accounting for 47% of total exports. The United Arab Emirates, Taiwan (Chinese), Malaysia, the United States, Cambodia, the Philippines, Hong Kong SAR, Singapore, Pakistan and Australia lagged somewhat behind, together accounting for a further 36%.

From 2012 to 2021, the biggest increases were recorded for the United States (with a CAGR of +29.9%), while shipments for the other leaders experienced more modest paces of growth.

In value terms, South Korea (\$X), Vietnam (\$X) and China (\$X) appeared to be the largest markets for printing and writing paper exported from Thailand worldwide, with a combined 50% share. Taiwan (Chinese), Malaysia, the United Arab Emirates, the United States, the Philippines, Hong Kong SAR, Singapore, Pakistan and Australia lagged somewhat behind, together c

Among the main countries of destination, the CAGR of +23.1%, recorded the highest rates of growth.



Have a question?

Ask me!

PAGE NO

We use cookies to improve your experience and for marketing. [Read our cookie policy](#) or [manage cookies](#).

[Accept essential cookies](#)

[Accept all cookies](#)

INDEXBOX

The average printing and writing paper export price stood at \$X per ton in 2021, falling by -1.9% against the previous year. Overall, the export price recorded a slight contraction. The growth pace was the most rapid in 2018 when the average export price increased by 13% against the previous year. Over the period under review, the average export prices reached the maximum at \$X per ton in 2013; however, from 2014 to 2021, the export prices remained at a lower figure.

Prices varied noticeably by country of destination: amid the top suppliers, the country with the highest price was Australia (\$X per ton), while the average price for exports to the United Arab Emirates (\$X per ton) was amongst the lowest.

From 2012 to 2021, the most notable rate of growth in terms of prices was recorded for supplies to Cambodia (+2.1%), while the prices for the other major destinations experienced mixed trend patterns.

Imports of Printing and Writing Paper

Imports into Thailand

After two years of growth, supplies from abroad paper decreased by -13.1% to X tons in 2022, to indicate a mild setback. The most prominent recorded in 2013 when imports increased by year. Over the period under review, imports reached X tons in 2017; however, from 2018 to 2022, imports remained at a lower figure.



Have a question?
[Ask me!](#)

INDEXBOX

Imports by Country

China (X tons), Japan (X tons) and Indonesia (X tons) were the main suppliers of printing and writing paper imports to Thailand, with a combined 81% share of total imports.

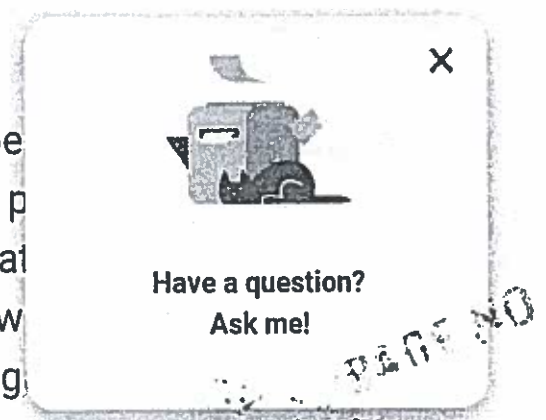
From 2012 to 2021, the most notable rate of growth in terms of purchases, amongst the main suppliers, was attained by Japan (with a CAGR of +4.4%), while imports for the other leaders experienced more modest paces of growth.

In value terms, China (\$X), Japan (\$X) and Indonesia (\$X) were the largest printing and writing paper suppliers to Thailand, together accounting for 80% of total imports.

In terms of the main suppliers, Japan, with a CAGR of +2.8%, recorded the highest growth rate of the value of imports, over the period under review, while purchases for the other leaders experienced more modest paces of growth.

Import Prices by Country

In 2021, the average printing and writing paper to \$X per ton, picking up by 8.4% against the p the import price, however, continues to indicate pattern. The most prominent rate of growth w the average import price increased by 13% ag



We use cookies to improve your experience and for marketing. Read our [cookie policy](#) or [manage cookies](#)

Accept essential cookies

Accept all cookies

INDEXBOX

highest prices were Taiwan (Chinese) (\$X per ton) and China (\$X per ton), while the price for Sweden (\$X per ton) and Japan (\$X per ton) were amongst the lowest.

From 2012 to 2021, the most notable rate of growth in terms of prices was attained by South Korea (+1.6%), while the prices for the other major suppliers experienced more modest paces of growth.

Source: IndexBox Platform

Base Year	Historical Period	Forecast Period	Units
2022	2012-2022	2023-2030	US\$, Tons

Frequently Asked Questions (FAQ) :

What are the largest markets for printing and writing paper in the world? +


What are the largest producers of printing and writing paper in the world? +

What are the leading suppliers of printing and writing paper to Thailand? +

What are the leading importers of printing and writing paper to Thailand? +

What is the average export price for printing and writing paper to Thailand? +

What is the average import price for printing and writing paper to Thailand? +



Have a question?
Ask me!

PAGE 10

INDEXBOX

This report provides an in-depth analysis of the market for printing and writing paper in Asia.

U.S. - Printing and Writing Paper - Market Analysis, Forecast, Size, Trends and Insights **\$499**

Nov 1, 2023 546

This report provides an in-depth analysis of the market for printing and writing paper in the U.S..

China - Printing and Writing Paper - Market Analysis, Forecast, Size, Trends and Insights **\$499**

Nov 1, 2023 481

This report provides an in-depth analysis of the market for printing and writing paper in China.

EU - Printing and Writing Paper - Market Analysis, Forecast, Size, Trends and Insights **\$499**

Nov 1, 2023 358

This report provides an in-depth analysis of the market for p
EU.

World - Printing and Writing Paper - Ma Forecast, Size, Trends and Insights

Have a question?
Ask me!

PAGE NO

We use cookies to improve your experience and for marketing. Read our [cookie policy](#) or [manage cookies](#).

[Accept essential cookies](#)

[Accept all cookies](#)

INDEXBOX

Pulp for Paper Market Dissolving Grade Wood Pulp Market

Soda and Sulphate Chemical Wood Pulp Market Sulphite Wood Pulp Market

Pulp From Fibres Other Than Wood Market Recovered Fibre Pulp Market Recovered Paper Market

Newsprint Market

Free Data: Printing and Writing Paper - Thailand

Table

Dashboard

Market	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030
Production Volume	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000
Consumption Volume	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000
Production Volume	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000
Production Volume	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000
Consumption Volume	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000
Production Volume	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000
Production Volume	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000
Production Volume	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000	1000000



Have a question?
Ask me!

[Pricing](#) [Resources](#) [Store](#) [Co](#)

PAGE NO

manage cookies

cookie policy

Accept essential cookies

Accept all cookies

INDEXBOX

ASK AI Chatbot

Chemicals

Food Products

Mining

Pharmaceuticals

Textiles, Apparel
And Leather

Wood and Paper

Privacy Policy

Cookies

Cookie settings

INDEXBOX S.r.l.

29, Boulevard

Grande-Duchesse

Charlotte

L-1331 Luxembourg

LU



© 2023 IndexBox, Inc



Have a question?
Ask me!

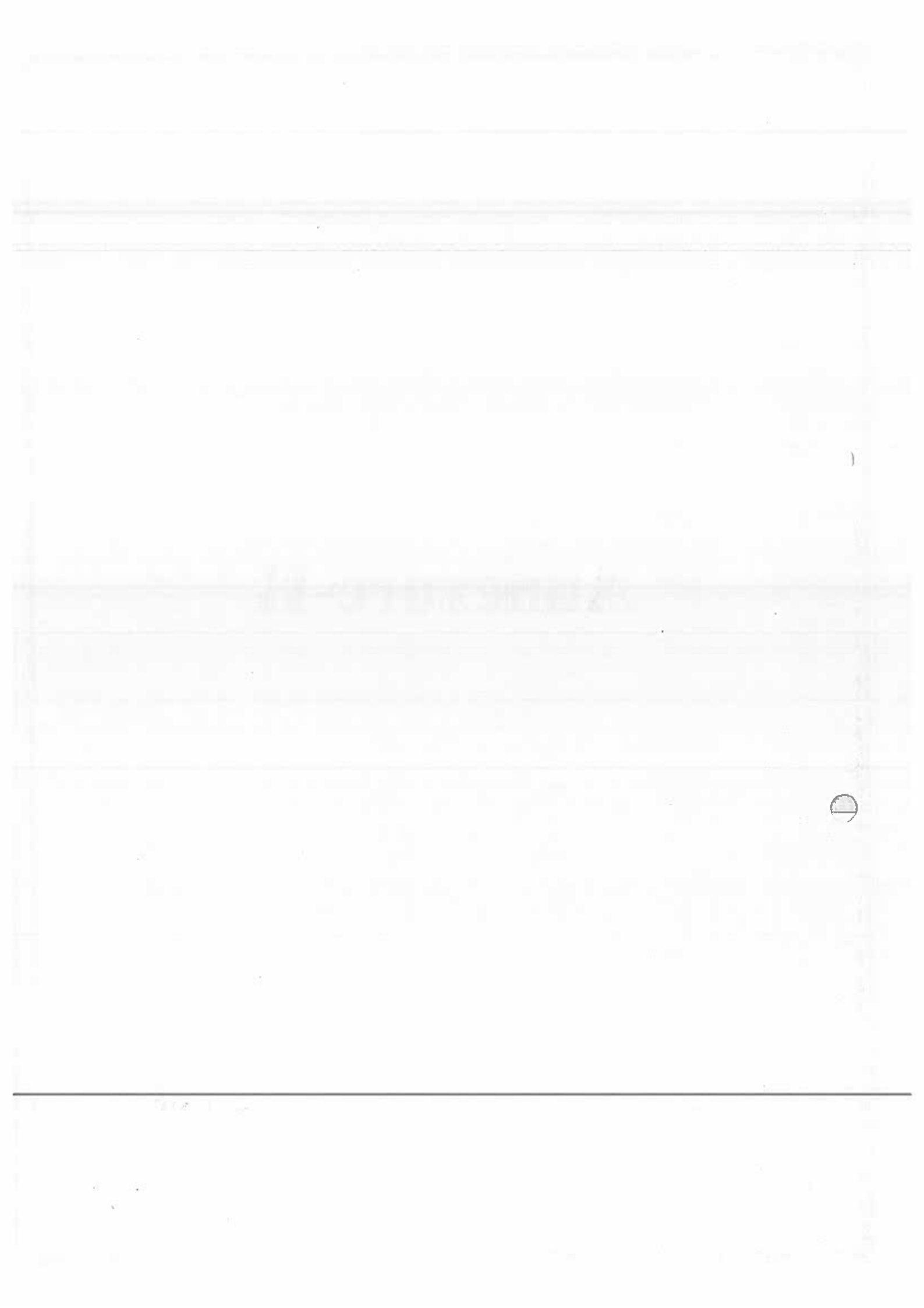
PAGE NO

[Faint, illegible text covering the majority of the page]

Handwritten mark or signature

Annexure-H

PAGE NO



Pulp & Paper Market Spotlight: Indonesia

October 03, 2022 Pulp and Paper

Author: Fisher International

Share   

As we've discussed in previous posts, when examining any sort of market trend across the pulp and paper supply chain, it's not only important to keep up with the major players in your backyard and in your unique sector; it's equally important to maintain awareness of what's happening in the P&P industry in other markets and countries around the world as well.

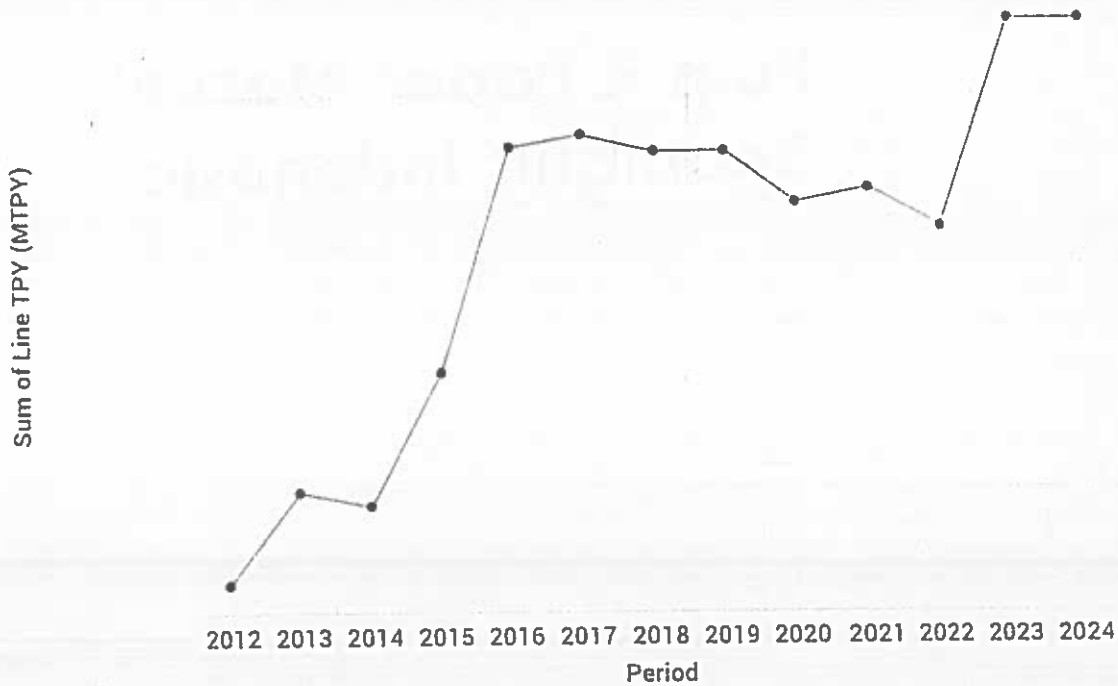
For example, Indonesia's pulp and paper capacity growth experienced a CAGR of 1.83 from 2014-2021 and currently has 115 operating sites. While these numbers don't necessarily compare to those of China, the United States or India, they still play an impactful role in the interconnected global structure of the P&P industry. As a dynamic market, it's important to understand the current state of Indonesia's P&P industry and the factors that are shaping its future.

A Quick Overview

When looking at Indonesia's capacity trend over the last several years, it's interesting to note the significant increase in capacity that occurred from 2014-2016 before it began to gradually decrease from 2017-present. In fact, Indonesia is expected to end 2022 with the lowest capacity since 2015. However, according to our data from FisherSolve, production capacity is

then expected to redirect its growth in 2023 with an anticipated 8% increase.

Pulp & Paper Capacity in Indonesia (Actual and Announced 2012-2024)



Source: FisherSolve

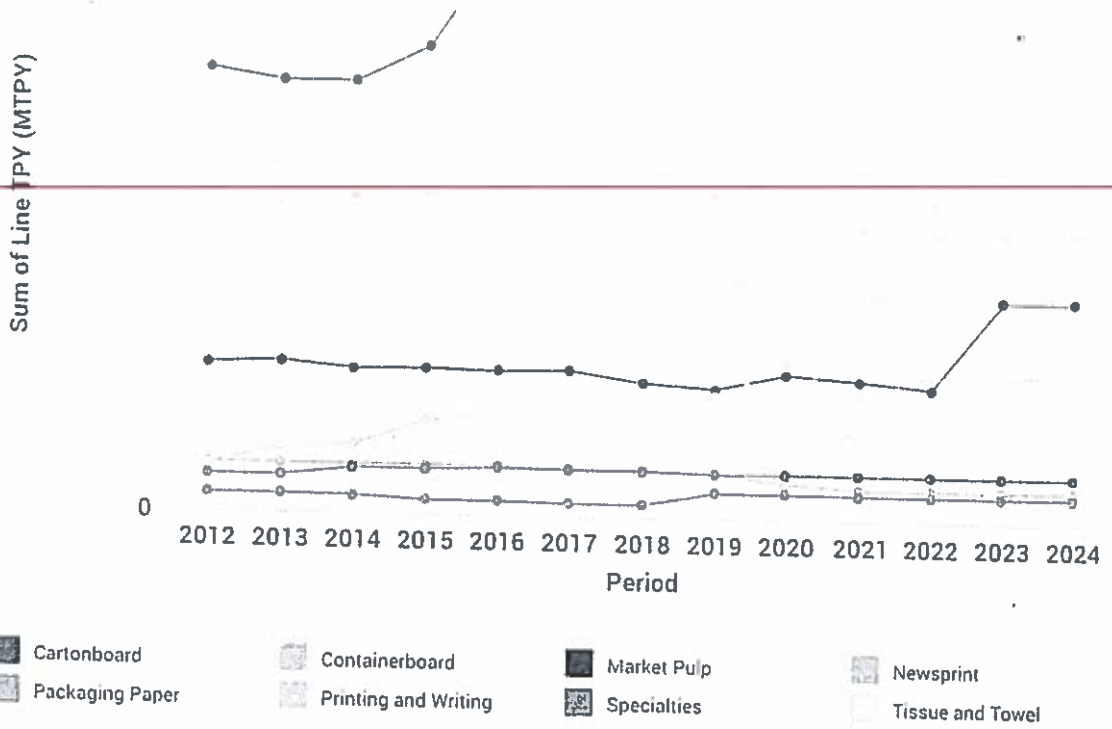
When we break this down by major grades, there is a trend we haven't typically seen when analyzing major grade capacity in various regions: market pulp is the clear-cut leading grade produced in Indonesia compared to the others. Within the last few years, we are used to seeing containerboard as the leading grade – however, at the end of 2022, there will be an expected 86% difference between market pulp capacity and containerboard capacity in Indonesia.

Similar to 2022, the top three leading grades in 2023 and 2024 in this region will consist of market pulp, containerboard, and printing and writing. Although, cartonboard is expected to see a significant increase in production in 2023, moving closer to the three aforementioned grades – a trend that will be crucial to keep an eye on. Most of the other grades are not expected to move as much over the next two years.

Pulp & Paper Capacity in Indonesia by Major Grade (Actual and Announced 2012-2024)

PAGE NO

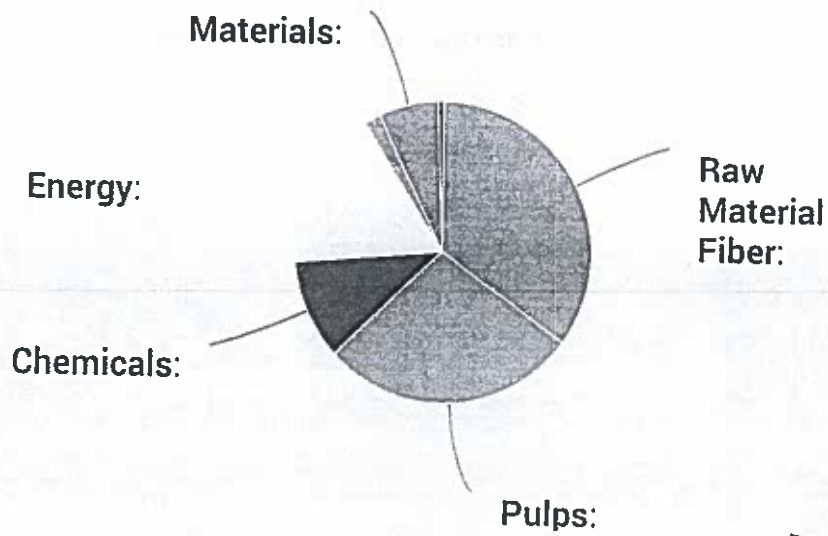




Source: FisherSolve

The graph below illustrates a cost breakdown of Indonesia's P&P industry, and as we can see, raw material fiber (35%), pulps (28%) and energy (17%) make up the top three largest cost components – a similar trend to many other countries.

Cost Breakdown of Indonesia's P&P Industry



5485 NO

2024/1/10

Source: FisherSolve

Factors Impacting Indonesia's P&P Industry

There are a number of factors influencing Indonesia's Pulp and Paper industry, but some of the most notable include:

- Indonesia's position as one of the largest exporters for paper and market pulp creates significant growth potential, pushing its P&P market in an upward trend.
- Indonesian paper producers are well consolidated, meaning that the production economy will be better than its peer countries with fragmented producers, such as India.
- The country's energy cost is one of the highest contributors to total cost due to high coal & gas prices in Indonesia. Its future fuel price trend will have a major influence on the overall competitiveness of its P&P industry.
- Since the government is increasing awareness of the importance to preserve the natural environment, there is less room for the expansion of local pulp and paper manufacturing facilities.
- Indonesia has relatively strong tissue demand as the migrant labor force supplements the slow population growth, and consumer income growth will support further tissue demand.

Overall, we believe that the Indonesian market has high potential due to growing domestic demand and global demand for P&P products. For in-depth analysis backed up by real market data, please [contact our Fisher professionals today.](#)

Fisher Solve Next

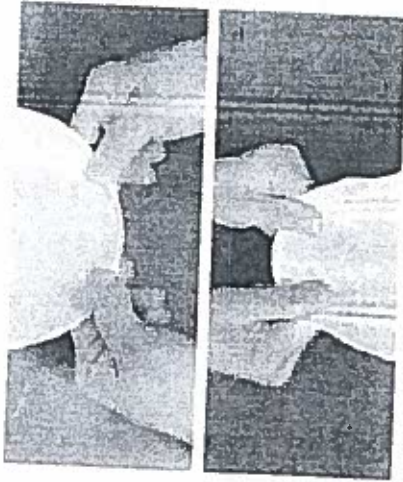
Free Product Demonstration

Schedule a free product demonstration with one of our experts

CONTACT US NOW
www.fishersolve.com

PAGE NO

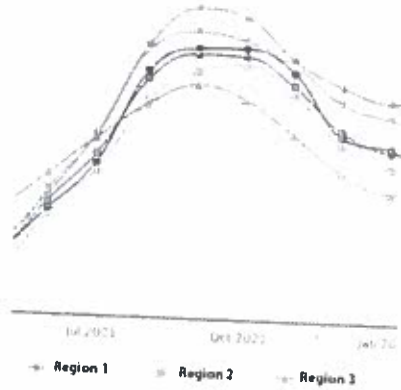
You May Also be Interested In



February 22, 2023
Pulp and Paper

Paper that Stretches? A Deepish Dive on Stretchable Paper and the Opportunities It Presents

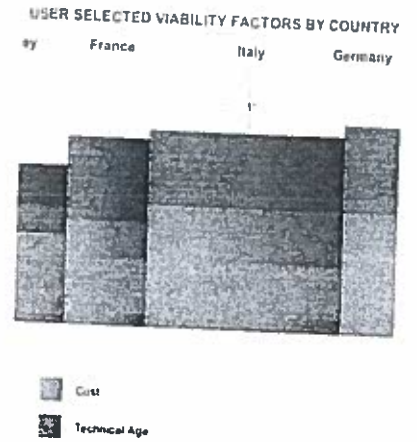
[Continue Reading](#)



February 20, 2023
Pulp and Paper

The Lack of Transparency with Current Recycled Fiber Price Indices: How Recycled Fiber 360 Can Help

[Continue Reading](#)



February 16, 2023
Pulp and Paper

Impact of Out-of-Office Work Opportunities and Spain's Preferred Climate Expected to Result in Further Gains

[Continue Reading](#)

PAGE NO

Subscribe to our Email Updates

Subscribe to Fisher International's
email updates,
right in your email

Subscribe



[Solutions](#)

[Fisher Solve Next](#)

[Sustainability](#)

[Consulting](#)

[About](#)

[FI Insights](#)

[Privacy Policy](#)

[Terms of Use](#)

[Site Credits](#)

North America: Headquarters - Charlotte, NC

253.854.1000

Europe - Finland

358 9 411 1111

Asia - China

Latin America - Brazil

Connect



in

©2023 Fisher International. All rights reserved.

PAGE NO

Annexure-I

PAGE 20



China policies are driving a wood pulp expansion frenzy

Producers have announced aggressive plans for more than 30 million tonnes of pulp capacity

September 16, 2021

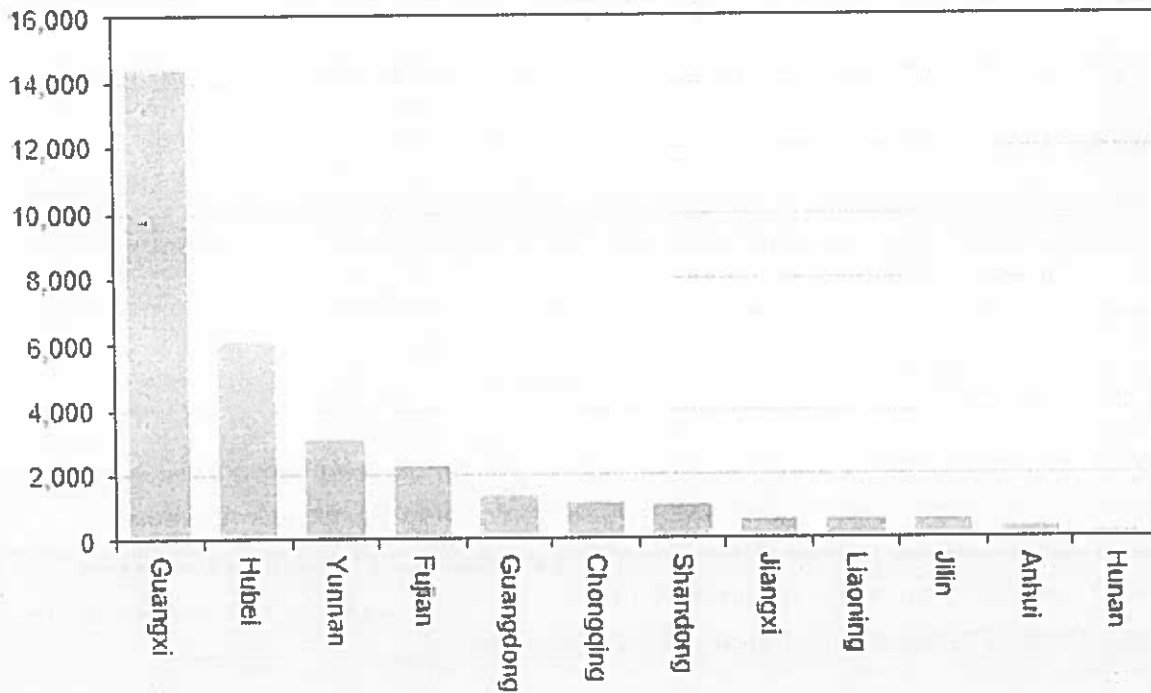
[China](#) [Pulp](#) [Packaging](#) [Paper](#)

By: Minnie Kong, Economist, Fastmarkets Forest Products

Over the last few years, many pulp and paper companies have unveiled aggressive expansion plans to invest in new wood pulp capacity in China. Our tracking shows 30 wood pulp projects with more than 30 million tonnes of capacity announced between January 2019 and July 2021. More than 60% of the announced capacity is concentrated in the Guangxi Zhuang Autonomous Region and Hubei Province.

In addition to forward integration benefits, which improves the economics of pulp production in China, favorable local government policies are key drivers behind the significant wave of capacity expansion. The government enforces environmental regulations, controls the permitting processes for new pulp lines and mills, and owns or controls most of the banks in the country, which make loans to the industry. The government also exerts a large degree of influence over forestry and controls land usage. So, understanding the current policies supporting the pulp projects in China is important to understanding the general course of the industry. Here, we provide a brief overview of the policies in the Guangxi Zhuang Autonomous Region and Hubei Province, the top two regions where new wood pulp projects are located.

Figure 1
Chinese wood pulp expansion announced between
January 2019 and July 2021
 Thousand tonnes



Note: Not all projects have firm commitments, including approval, financing, site acquisition and equipment contracts.

Guangxi Zhuang Autonomous Region

The regional government released the "Industrial Promotion Work Plan for 'Two-pronged Ten Billion Projects and New Projects'" in 2019, in a bid to attract enterprises to invest in the region. Wood processing and paper making is one of the 12 industrial clusters that the autonomous region is focusing on developing. Over the last 30 months, more than 14 million tonnes of new wood pulp capacity has been announced in Guangxi.

"Two-pronged ten billion" projects refer to major industrial projects with an investment exceeding RMB 10 billion or an output value exceeding RMB 10 billion. "Two-pronged new" projects refer to new industries and new technology projects. New industry projects include key projects such as strategic emerging industries, new formats and new models, while new technology projects refer to key projects that adopt new technologies to transform and upgrade traditional industries.

Major supportive policies for the above-mentioned industrial projects are as follows:

1. Increasing financial support strength

Over 50% of the funds are collectively earmarked from the special funds for industrial and information development, innovation-driven projects, Beibu Gulf development, capital construction investment within the budget and so on every year. The use of the earmarked funds is approved and arranged by the "Two-pronged Projects"

construction headquarters of the autonomous region to support their construction. The government investment guidance fund, Public-Private Partnership (PPP) project, government purchasing services, financing guarantee, loan with discounted interest, post-hoc awards and subsidies, and other means are comprehensively utilized to beef up support for the two-pronged projects.

2. Increasing banking and credit support strength

Banking financial institutions are encouraged to support the construction of two-pronged projects by means of consortium loans, joint credit granting, concerted investment action, supply chain banking, M&A loans and bank-insurance interaction. And banking financial institutions are encouraged to list the enterprises in the two-pronged projects drive as key customers at the head office and branch levels and increase the allocation of credit resources.

3. Reducing tax burden for enterprises

The preferential policies on value-added tax and income tax introduced by the state and the autonomous region shall be implemented. Education surcharges, employment security funds for the disabled, trade union dues and other expenses can be reduced or exempted for enterprises meeting the requirements according to regulations.

4. Prioritizing project land use

The approval time for the use of forest land will be shortened and the approval mechanism for the use of forest land will be improved. According to the national land spatial planning, the government will accelerate the preparation and improvement of the park planning and give priority to the requirements of the national land spatial planning adjustment for the two-pronged projects and handle them expediently with a simplified procedure. The Department of Natural Resources of Guangxi Zhuang Autonomous Region has established a special office for the land service of the two-pronged projects to speed up the guarantee of project land use.

5. Further reducing the construction and operation costs of the project

The two-pronged projects of the autonomous region are preferentially included in the scope of electricity market-oriented transactions in the autonomous region. The government will support enterprises to further lower power consumption costs by participating in annual long-term contracts, monthly bidding and incremental transactions, and will strive to control the power price at about RMB 0.5/kWh. The government will accelerate the pace of gas price reform, further bring down gas prices and implement direct supply when users of the two-pronged projects meet a certain gas consumption standard. The government will also effectively reduce the logistics costs of the two-pronged projects in the autonomous region.

6. **Establishing a tolerance mechanism for project approval and a "green channel"**
For the two-pronged projects, the tolerance mechanism for investment approval and the investment commitment system of the project owner shall be implemented. After the completion of the initial main requirements, such as a project feasibility study and approval, environmental impact assessment and issuance of a land use certificate, the project owner can make a legally effective written commitment and the project construction can begin. The government will improve approval efficiency by reviewing and approving the two-pronged projects as they arrive.
7. **Implementing the classified approval system for environmental impact assessments.**
The government will simplify relevant content when preparing the report on environmental impact assessment for the two-pronged projects located in an industrial park or industrial cluster district which has already gone through an environment impact assessment.

Hubei Province

There are also ambitious expansion plans in Hubei by several pulp and paper companies. Hubei Province, which was hit hard by Covid-19 in 2020, has sought to attract investment in the region with the aim of boosting and revitalizing its economy that was disrupted by the pandemic. The local government issued the "Opinions on Accelerating the Construction of Major Projects and Focusing on Expanding Effective Investment" after the lockdown was lifted in April 2020. According to the All-China Federation of Industry and Commerce, private enterprises invested RMB 476.5 billion (USD 68.5 billion) in 1,577 new projects in Hubei Province between late March and early August 2020 as part of the economic revival efforts in the region following Covid-19.

The key measures and investment stimulus in the Opinions include:

1. **Reform the mode of land supply**

The allocation of new construction land quotas focuses on ensuring the construction of key projects in the province and giving prior support to these projects. To encourage the implementation of a transfer mode of a "sample plot", all localities should study and put forward the related indicators of leading industries, project direction, investment intensity, etc. and declare these transfer conditions at one time, as well as promote the project as "starting construction upon acquiring the land".

2. **Improve the energy consumption mechanism**

The province seeks to optimize the allocation of total energy consumption quotas to ensure the rational use of energy for new construction and commissioning projects in 2020; it will also give priority to the arrangement of the energy consumption for the major national and provincial projects in the 14th Five-Year Plan. To facilitate approval for construction in accordance with the national industrial layout plan and commissioning plan, the major projects that were newly set up in 2020 and put into

Annexure-J

PAGE NO

[Faint, illegible text, likely bleed-through from the reverse side of the page]

[Faint, illegible text at the bottom of the page]

Sun paper: it plans to invest 20 billion yuan in the construction of Forest Pulp paper integration and supporting industrial park project

© Feb 27, 2022 05:19 PM (GMT+8) · EqualOcean s

Sun paper announced that on February 26, the company signed the strategic cooperation framework agreement with Nanning Municipal People's Government of Guangxi Zhuang Autonomous Region, which agreed that sun paper would invest in the construction of the "Forest Pulp paper integration and supporting industrial park project with an annual output of 5.25 million tons" in Nanning, with a total investment of about 20 billion yuan.

This text is a result of machine translation.

Briefing

Power Device Company Maplesemi Completes Series A+ Financing Round

Briefing

Acoustic Technology Company Audfly Completes Series B Financing Round



Technology

Can Chinese Companies Create the Next ChatGPT?

This article discusses the possible birth of the Chinese version of "ChatGPT" and relevant challenges. Additionally, this article also tries to make meaningful ..

Briefing

Wicue Raised CNY 200 Mn in Series C+ Financing Round

Briefing

Intelligent Industrial Drone and UAV Systems Developer I-KINGTEC Closed A Series C+ Financing Round



Briefing

Em-Data Technology Completed Strategic Financing Round

Briefing

We-Linking Raised Over CNY 10 Mn in Angel Round

Briefing

Intraoperative Neurophysiological Monitoring Equipment Developer NeuroFlag Closed An Angel Round

Briefing

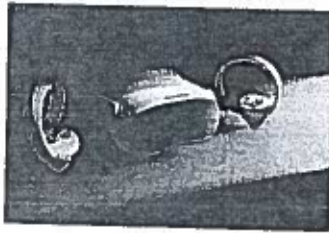
Innovative Drug Developer Rezu Bio Raised CNY 10 Mn in Series Pre-A



Technology

Xorbits Completes USD Multi-Million Angel Round of Financing

The Python native ecosystem will play an increasingly important role in future infrastructure.



Technology

VR Hardware Manufacturer Pimax Completes C1 Round of Financing of CNY 200 Million

In 2026, the overall scale of the domestic virtual reality industry will exceed CNY 350 billion.

Briefing

ZD Medtech Raised Over CNY 100 Mn in Series B

Briefing

Smart Powered Bionic Prosthetic Star BionicM Nets Over CNY 10 Mn

Briefing

JD's REIT Debuts on STEC Raising over CNY 1.75 Bn



Technology

15 Companies to Watch in February 2023 — Technology

We at EqualOcean tracked the major funding rounds and industry events in China's technology space in February 2023. And the following is a list of deals w...



Healthcare

Pulnovo Medical: Chinese Medical Device Companies are Making Their Voices Heard Globally

Chinese medical device companies, represented by Pulnovo Medical, have always pursued medical innovation under the support of policies and capital. They hav...

Briefing

Medical Technology Company MacroLux Nets Nearly CNY 100 Mn in Series A

Briefing

ForLong Biotech Nets Over CNY 100 Mn in Series A

Briefing

CytoCan Corp. Nets CNY 10 Mn in Seed Round

Briefing

iPhone Assembler Foxconn Hires Former Nissan Exec Jun Seki as EV Strategy Head

See more

Read next

In-depth

15 Companies to Watch in February 20...

Technology

15 Companies to Watch in February 20...

In-depth

Pulnovo Medical: Chinese...

Healthcare

Pulnovo Medical: Chinese...

In-depth

Can Chinese Companies Create the...

Technology

Can Chinese Companies Create the...

In-depth

An Overview of The Energy Storage Market

Technology

An Overview of The Energy Storage Market

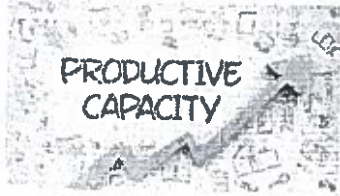
Annexure-K

PAGE NO

1120 0221

Suzano to build new pulp mill with 2.3 million t capacity in Brazil

EUWID + 19 May 2021 | ~ 1 min | Published on 26 May 2023



Brazilian paper and pulp group Suzano will build a new pulp mill in Brazil with the world's largest fibre line and a capacity of 2.3 million t of eucalyptus pulp. Production is scheduled to start in the first quarter of 2024, the company announced in mid-May. The large-scale project, called Cerrado, is being

built ...

Read more
EUWID +

You can only use this article with a valid subscription and registration. Registered subscribers can access all articles after entering their user name and password.

© 2021 EUWID Europäischer Wirtschaftsdienst GmbH | All Rights Reserved

Copyright notice The regular and systematic circulation of price tables from the EUWID Premium section is not permitted. Only one copy is permitted to be printed out for the purpose of circulation within the company. Distribution of EUWID price tables by intranet or by E-Mail within a company, throughout a group of companies, to customers, or to independent sales representatives is not permitted and constitutes an infringement of copyright law.

PAGE NO

الذاتية

الذاتية

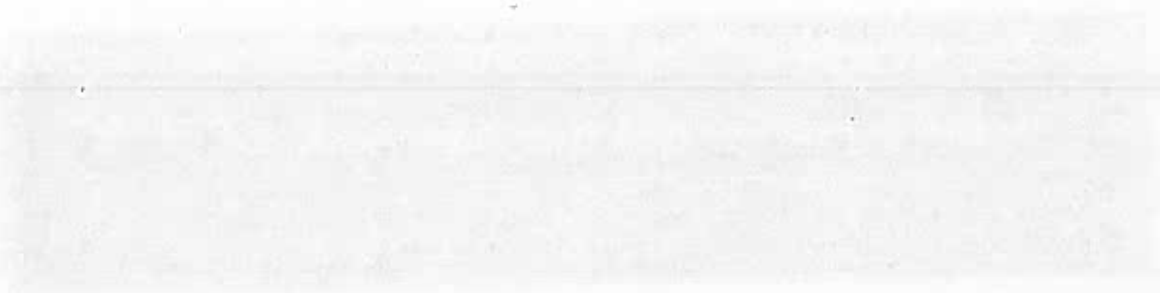
الذاتية

الذاتية

الذاتية

الذاتية

الذاتية



Handwritten marks or scribbles at the bottom left of the page.

Annexure-L

PAGE NO

1-2-1954

1

1-2-1954

Paper Technology International is a unique information and news resource for the global pulp, board, paper, and tissue industry.



PAPER TECHNOLOGY INTERNATIONAL

THE DEFINITIVE TECHNOLOGY REVIEW FOR THE PULP AND PAPER INDUSTRY

[\(https://papertechnologyinternational.com/\)](https://papertechnologyinternational.com/)

[\(!\[\]\(339a16584d5da0f0a3ca4e9ec17bf6a1_img.jpg\) https://twitter.com/PaperTechnology\)](https://twitter.com/PaperTechnology)

[\(!\[\]\(a870788d6ed9b8fd294b7654a8c8526b_img.jpg\) https://www.facebook.com/Paper-Technology-International-103976258284269\)](https://www.facebook.com/Paper-Technology-International-103976258284269)

[\(!\[\]\(de95854c7ee024cfadc48187bbb781b2_img.jpg\) https://www.linkedin.com/company/paper-technology-international\)](https://www.linkedin.com/company/paper-technology-international)

[HOME \(HTTPS://PAPERTECHNOLOGYINTERNATIONAL.COM/\)](https://papertechnologyinternational.com/)

[ABOUT \(HTTPS://PAPERTECHNOLOGYINTERNATIONAL.COM/ABOUT/\)](https://papertechnologyinternational.com/about/)

[ARTICLES \(HTTPS://PAPERTECHNOLOGYINTERNATIONAL.COM/ARTICLES/\)](https://papertechnologyinternational.com/articles/)

[WHITEPAPERS](https://papertechnologyinternational.com/whitepapers/)

[\(HTTPS://PAPERTECHNOLOGYINTERNATIONAL.COM/WHITEPAPERS/\)](https://papertechnologyinternational.com/whitepapers/)

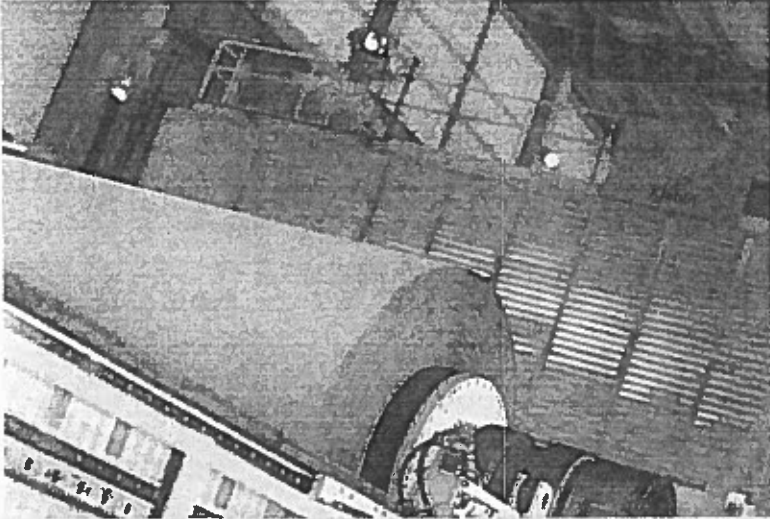
[MEDIA \(HTTPS://PAPERTECHNOLOGYINTERNATIONAL.COM/MEDIA/\)](https://papertechnologyinternational.com/media/)

[PAPER INDUSTRY NEWS](https://papertechnologyinternational.com/paper-industry-news/)

[\(HTTPS://PAPERTECHNOLOGYINTERNATIONAL.COM/PAPER-INDUSTRY-](https://papertechnologyinternational.com/paper-industry-news/)

[NEWS/\)](https://papertechnologyinternational.com/paper-industry-news/)

[CONTACT \(HTTPS://PAPERTECHNOLOGYINTERNATIONAL.COM/CONTACT/\)](https://papertechnologyinternational.com/contact/)



Klabin starts up first paper machine of Puma II Project

Klabin starts up first paper machine of Puma II Project

Brazil's largest producer and exporter of paper for packaging and paper packaging, Klabin takes another important step in its growth strategy with the startup of the first paper machine (MP27) of the Puma II Project located in Ortigueira, Paraná, which is its largest investment to date. With a production capacity of 450,000 tons, MP27 launches production of Eukaliner®, the world's first kraftliner paper made 100% from eucalyptus fiber.

São Paulo, August 30, 2021 – The Puma II Project is the result of a R\$12.9 billion investment made by Klabin to build two new paper machines, by 2023, with integrated pulp production. The startup marks an important milestone in the Company's current expansion cycle and

reinforces its capacity for sustainable growth combined with technology.

"We sought the most modern technology to, like we did with the Puma Unit, make Puma II a global reference in sustainability, technology and innovation, combined with the principles of Industry 4.0, and guided by the mission of supplying the market with high-quality products to create value for the Company and for society, always aligned with the best health and safety practices and focusing on the development of local communities." said Francisco Razzolini, director of Industrial Technology, Innovation and Sustainability at Klabin.

To anticipate market transformations driven by new consumer habits and profiles, Klabin took advantage of the diversity of its forestry assets and conducted in-depth research that made the development of Eukaliner® possible, a product patented by the Company and whose production is 100% sold, 70% of which through contracts already signed, serving the domestic and international markets.

"Eukaliner® is the world's first kraftliner paper made exclusively from eucalyptus fiber, an innovative product that combines a series of competitive advantages, including a more robust structure, enabling a reduction in density of up to 10% in corrugated board packaging and higher strength, better printing quality and sustainability attributes, since it uses less resources to produce the same amount of paper." explained Flávio Deganutti, Paper director at Klabin.

In parallel with the startup of MP27, the construction of the second paper machine of the Puma II Project, whose startup is slated for 2023, already has begun and is following all mandatory health and safety protocols. MP28, with annual production capacity of 460,000 tons, will focus on the production of paperboard and consolidate Klabin's position as a global producer of paperboard for liquid (milks and juices) and processed foods (cereals, chocolate, pizza, proteins, etc.), personal and home care products (laundry detergent, toothpaste) and multi-pack packaging for cans and bottles, as well as paperboard for the growing food service segment, such as cups and trays, building on the Company's growth and expansion plans. The decision on the paperboard machine, which was announced in May 2021, was based on an in-depth assessment of market trends, opportunities and conditions.

"The sector is in a prosperous moment, and we think the market will remain strong over the coming years, driven by growing demand for sustainability. Paperboard represents good opportunities for our business, which is integrated, diversified and flexible. It also can be combined with barriers, which have been registering strong growth as an alternative to single-use plastic packaging," said Deganutti.

Sustainability-oriented strategy

The Puma II Project was designed to combine productivity with the lowest possible environmental impact. One of the various initiatives planned is the construction of a sulfuric acid plant that will make the unit self-sufficient in the production of this chemical compound, which is used in the pulp and paper production process and will be produced from gases collected in the mill. Another important initiative is the construction of a Biomass Gasification Plant, which will supply renewable fuel to the Lime Kiln, replacing the use of fossil fuels. At the unit, Klabin also will install Turbogenerator 3 (TG-3), which will transform thermal energy from steam (generated by the Recovery and Strength Boilers from biomass) into electricity.

Some of the benefits of adopting these technologies include expanding our renewable energy matrix and reducing greenhouse gas emissions. These are critical actions for combating climate change, which is a topic of huge importance and is the guiding principles for this project and for the Company's future investments. The initiatives are part of a strategic plan to reach the ambitious targets and commitments undertaken by Klabin," added Razzolini.

Largest private investment ever in the state of Paraná

Klabin has had a large position in the state of Paraná since 1934, when it arrived in the state to build Brazil's first integrated pulp and paper plant. Since then, it has actively contributed to the state's local development. The municipality of Ortigueira, where the Puma Unit is located, for example, has registered strong economic growth in recent years.

According to the Brazilian Institute of Geography and Statistics (IBGE), in 2018, the city once again registered the highest GDP growth in the region, which grew by 17.78% to R\$2 billion for the first time (R\$2.17 billion, eight times higher than in 2010, when GDP stood at R\$247.67 million). The construction of the Puma II Project at the same Unit has contributed R\$198 million in wages to date, or approximately R\$8 million per month on average.

Klabin's investments over the last ten years in Paraná have surpassed R\$20 billion. Moreover, the Puma II Project has so far created over 21,300 direct and indirect jobs. In its construction phase, 76% of workers lived in Paraná, with over half of living in Ortigueira (where the project is located), Telêmaco Borba and Imbaú, and 14% in other cities of the state, of which 76% lived in the Campos Gerais region. In recent years, courses offered by the Company have benefited 127 professionals in the city of Ortigueira alone, with over 80% hired in operational units in the region. For the startup of MP27, Klabin hired 384 professionals. In the Forestry area, Klabin hired 75 professionals to work in harvesting and logistics, mainly in Itararé, Itapeva and Ortigueira.

To hire more people from the region, Klabin invested in technical training, with three technical courses offered to the communities of Ortigueira and Telêmaco Borba: Pulp & Paper Technician, Mechanics Technician and a refresher course for Pulp and Paper technicians,

PAGE NO

02/01/19

benefiting a total of 127 people. To date, among those hired or in the process of being hired, 80% of trained professionals were hired in operational positions in Klabin's Puma and Monte Alegre units, in Ortigueira and Telêmaco Borba.

In the area of influence of the Puma II Project, Klabin develops social projects in 12 municipalities: Ortigueira, Telêmaco Borba, Imbaú, Tibagi, Cândido de Abreu, Congonhinhas, Curiúva, Reserva, Rio Branco do Ivaí, Sapopema, São Jerônimo da Serra and Ventania. Over these two years, around R\$12 million was invested in areas such as education, family farming, support for public management planning, solid waste, entrepreneurship and actions to combat violence against children and women.

The Puma II Project has a strong Risk Management project applied to all contractor companies and oriented to prevent adverse events in the construction and operations of the Puma Unit. This management encompasses measures to reduce the frequency and minimize the consequences of such events. To prevent, minimize and manage the social, economic and environmental impacts of the construction of the Puma I and Puma II Projects in Ortigueira, Telêmaco Borba and Imbaú, in 2013, Klabin created the Population Monitoring Committee, which is maintained by the Company. Composed by municipal and state representatives from the areas of Social Action, Education, Health and Public Safety, the group holds monthly meetings to analyze data on equipment use, public services and safety, aiming to avoid impacts and carry out integrated actions.

About Klabin

Klabin is Brazil's largest producer and exporter of packaging paper, the only company in the country to offer one-stop shop solutions in hardwood, softwood and fluff pulp, and the leader in the corrugated board packaging and industrial bags markets. Founded in 1899, it has 24 industrial units in Brazil and one in Argentina.

Its entire management is guided by Sustainable Development, pursuing integrated and responsible growth that combines profitability, social development and environmental commitment. Since 2014, Klabin has been a component of the Corporate Sustainability Index (ISE) of the São Paulo Stock Exchange (B3) and in 2020 it was included in two portfolios of the Down Jones Sustainability Index: World Index and Emerging Markets Index. A signatory to the

United Nations Global Compact and to the Brazilian Pact to Eradicate Slave Labor, Klabin seeks suppliers and business partners that share its values of ethics, transparency and respect for sustainability principles.

For further information visit: [Klabin.com.br](https://klabin.com.br) (<https://klabin.com.br/>)

To feature your company on Paper Technology International News please visit our website <https://papertechnologyinternational.com> (<https://papertechnologyinternational.com>) or email your press release to info@papertechnologyinternational.com (<mailto:info@papertechnologyinternational.com>)

TAGS: [KLABIN \(HTTPS://PAPERTECHNOLOGYINTERNATIONAL.COM/TAG/KLABIN/\)](https://papertechnologyinternational.com/tag/klabin/)

← [Previous Post](#)

[Klabin invests R\\$ 40 million to improve sustainable barrier in paperboard](https://papertechnologyinternational.com/klabin-invests-r-40-million-to-improve-sustainable-barrier-in-paperboard/)
(<https://papertechnologyinternational.com/klabin-invests-r-40-million-to-improve-sustainable-barrier-in-paperboard/>)

[Next Post](#) →

[Valmet's OptiConcept M kraft making line successfully started up at Klabin's Puma Project in Brazil](https://papertechnologyinternational.com/valmets-opticoncept-m-kraft-making-line-successfully-started-up-at-klabins-puma-project-in-brazil/)
(<https://papertechnologyinternational.com/valmets-opticoncept-m-kraft-making-line-successfully-started-up-at-klabins-puma-project-in-brazil/>)

➤ YOU MIGHT ALSO LIKE



(<https://papertechnologyinternational.com/andritz-receives-order-for-a-major-disc-filter-rebuild-from-sca-pulp->



(<https://papertechnologyinternational.com/valmet-to-rebuild-cooking-fiberline-and-evaporation-plant-for-andhra->



(<https://papertechnologyinternational.com/stora-enso-survey-finds-physical-books-still-outperform-e-books/>)

Date	Description	Amount
1912	Jan 1	100.00
1912	Feb 1	200.00
1912	Mar 1	300.00
1912	Apr 1	400.00
1912	May 1	500.00
1912	Jun 1	600.00
1912	Jul 1	700.00
1912	Aug 1	800.00
1912	Sep 1	900.00
1912	Oct 1	1000.00
1912	Nov 1	1100.00
1912	Dec 1	1200.00
1913	Jan 1	1300.00
1913	Feb 1	1400.00
1913	Mar 1	1500.00

1

Annexure-M

PAGE NO

11-20-2024

11-20-2024

▲ India: Extension of definitive antidumping duty on imports of uncoated copier paper from Indonesia and Singapore (Termination of duty on imports from Thailand)

INVESTIGATION PROGRESS		IMPLEMENTATION LEVEL	AFFECTED FLOW
		National	Inflow
Date	Status		
03 Mar 2022	Termination		
27 Aug 2021	Extended duty		
19 May 2021	Review		
04 Dec 2018	Definitive duty		
02 Nov 2017	Initiation		
ANNOUNCED AS TEMPORARY		NON-TRADE-RELATED RATIONALE	ELIGIBLE FIRMS
Yes		No	all
JUMBO	TARIFF PEAK		
No	No		

← back to the state act

Inception date: 04 Dec 2018 | Removal date: open ended

▲ Anti-dumping

The antidumping investigation was initiated on 2 November 2017. The products subject to investigation are classified under HS code 4802. The investigation follows the application lodged by JK Paper Limited, JK Paper Limited, The West Coast Paper Mills Ltd., Tamil Nadu Newsprint and Papers Limited Ltd and Ballarpur Industries Limited.

On 4 December 2018, the Indian authorities imposed a definitive anti-dumping duty on imports of uncoated copier paper from Indonesia, Thailand and Singapore. The rate of duty on imports from Thailand, Indonesia or Singapore is USD 855.01 per metric tonne. The duty is in force for a period of three years.

On 19 May 2021, the Indian authorities announced the initiation of a sunset review of the definitive duty imposed on imports of the subject good from Indonesia, Thailand and Singapore. This follows the application lodged by JK Paper Limited.

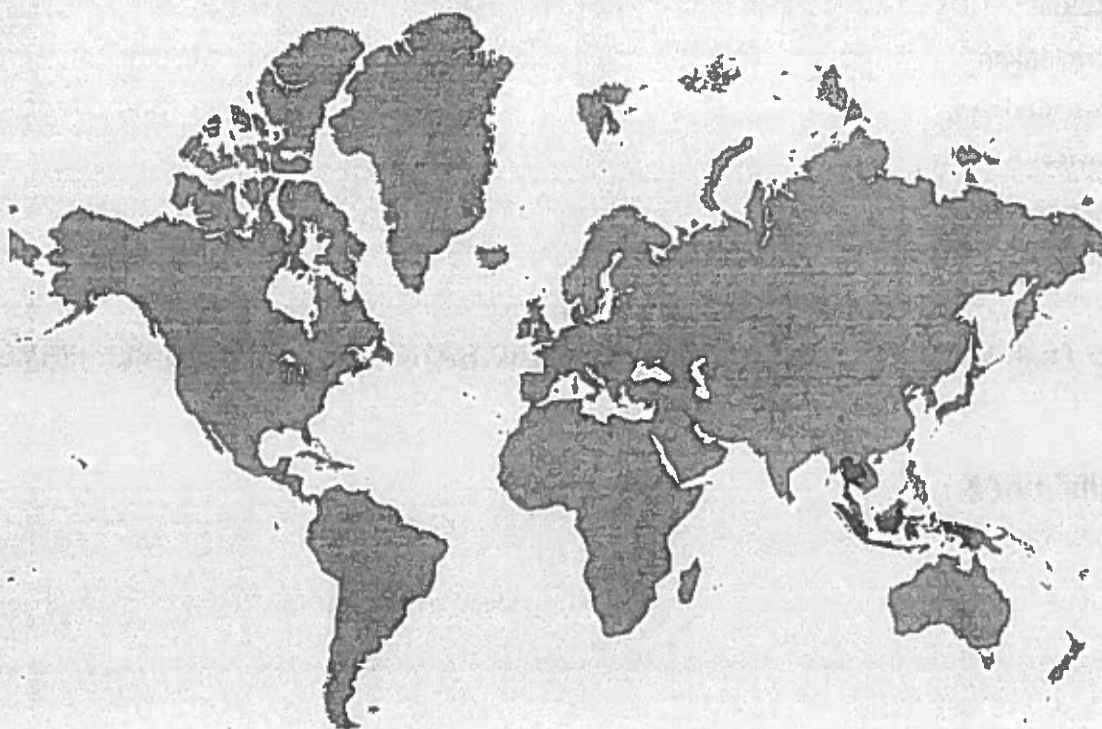
On 27 August 2021, the Department of Revenue of India extended the definitive duty on imports of the subject good from Indonesia and Singapore until 28 February 2022 following the initiation of the sunset review.

On 26 November 2021, the Indian Directorate General of Trade Remedies issued its final findings of the sunset review. It recommended the continuation of the existing antidumping duty.

On 3 December 2021, the definitive duty on imports from Thailand was terminated.

On 3 March 2022, the Indian authorities issued a notice extending the definitive duty imposed on imports of uncoated copier paper from Indonesia, Thailand and Singapore following the conclusion of the sunset review. The rate of duty is maintained in USD 855.01 per metric tonne.

AFFECTED COUNTRIES (3)



AFFECTED SECTORS AND PRODUCTS

321

Pulp, paper & paperboard

4802 Uncoated paper and paperboard, of a kind used for writing, printing or other graphic purposes, and non perforated punch cards and punch tape paper, in rolls or rectangular (including square) sheets, of any size, other than paper of heading 48.01 or 48.03

- 480220 Paper and paperboard of a kind used as a base for photosensitive, heatsensitive or electrosensitive paper or paperboard
- 480254 Weighing less than 40 g/m²
- 480255 Weighing 40 g/m² or more but not more than 150 g/m², in rolls
- 480256 Weighing 40 g/m² or more but not more than 150 g/m², in sheets with one side not exceeding 435 mm and the other side not exceeding 297 mm in the unfolded state
- 480257 Other, weighing 40 g/m² or more but not more than 150 g/m²
- 480258 Weighing more than 150 g/m²
- 480261 In rolls

▶ Please report this page in case you detect an inaccuracy in its content.

DATE	AMOUNT	TAX	TOTAL
1-1-78	100.00	2.00	102.00
1-15-78	200.00	4.00	204.00
2-1-78	150.00	3.00	153.00
2-15-78	300.00	6.00	306.00
3-1-78	250.00	5.00	255.00
3-15-78	400.00	8.00	408.00
4-1-78	350.00	7.00	357.00
4-15-78	500.00	10.00	510.00
5-1-78	450.00	9.00	459.00
5-15-78	600.00	12.00	612.00
6-1-78	550.00	11.00	561.00
6-15-78	700.00	14.00	714.00
7-1-78	650.00	13.00	663.00
7-15-78	800.00	16.00	816.00
8-1-78	750.00	15.00	765.00
8-15-78	900.00	18.00	918.00
9-1-78	850.00	17.00	867.00
9-15-78	1000.00	20.00	1020.00
10-1-78	950.00	19.00	969.00
10-15-78	1100.00	22.00	1122.00
11-1-78	1050.00	21.00	1071.00
11-15-78	1200.00	24.00	1224.00
12-1-78	1150.00	23.00	1173.00
12-15-78	1300.00	26.00	1326.00
TOTAL	12000.00	240.00	12240.00

STATE OF CALIFORNIA
DEPARTMENT OF REVENUE
SALES TAX REPORT

STATE OF CALIFORNIA
DEPARTMENT OF REVENUE
SALES TAX REPORT

Annexure-N

PAGE NO

AMERICAN

7

①

1911

▲ Australia: Definitive anti-dumping duty on imports of A4 copy paper from Brazil, China, Indonesia and Thailand and definitive countervailing duty on imports from China

INVESTIGATION PROGRESS		IMPLEMENTATION LEVEL	AFFECTED FLOW
		National	Inflow
Date	Status		
02 Jul 2021	Review		
19 Apr 2017	Definitive duty		
9 Sep 2016	Preliminary duty		
12 Apr 2016	Initiation		
ANNOUNCED AS TEMPORARY		NON-TRADE-RELATED RATIONALE	ELIGIBLE FIRMS
No		No	all
JUMBO	TARIFF PEAK		
No	No		

○ - back to the state act

Inception date: 29 Sep 2016 | Removal date: open ended

▲ Anti-dumping

On 12 April 2016, the Commissioner of the Australian Anti-Dumping Commission initiated an antidumping investigation on imports of A4 copy paper exported from Brazil, China, Indonesia and Thailand (Anti-dumping Notice No. 2016/33, 12.04.2016). The product subject to investigation is classified under the following HS code subheading: 4802.56.10. The complaint was lodged on 24 February 2016 by Paper Australia Pty Ltd.

An anti-subsidy investigation was also initiated (see measure 11776)

On 29 September 2016, the Commissioner of the Australian Anti-Dumping Commission imposed provisional anti-dumping duties on imports of A4 copy paper from China and Thailand (Anti-dumping Notice No. 2016/100). The rate of the duty imposed on imports from China is between 4% and 17.8% depending on the company. The rate of the duty imposed on imports from Thailand is between 18.4% and 23.1% depending on the company. The measure is calculated on the basis of an ad valorem duty method. There is no duty applied on imports from Indonesia and Brazil.

On 7 November 2016, the Commissioner of the Australian Anti-Dumping Commission imposed provisional anti-dumping duties on imports of A4 copy paper from Indonesia and Brazil. The rate of duty on imports from Brazil is

2.9% or 31.9% depending on the company. The rate of duty on imports from Indonesia is between 4.4% and 86.6% depending on the company. Additionally, the Commissioner of the Australian Anti-Dumping Commission amended the provisional anti-dumping duties on imports of A4 copy paper from China and Thailand. The rate of the duty imposed on imports from China is 34.4% or 40% depending on the company. The rate of the duty imposed on imports from Thailand is between 13.4% and 23.7% depending on the company. The duties imposed on imports from Indonesia, China and Thailand are calculated on the basis of a combination duty method, whilst the measure imposed on imports from Brazil is calculated on the basis of an ad valorem duty method.

On 19 April 2017, the Australian authorities imposed a definitive duty on imports of the subject good from Brazil, China, Indonesia and Thailand. The rate of duty on imports from Brazil is 2.9%. The rate of duty on imports from China is 3.1% or 34.4% depending on the company. The rate of duty on imports from Indonesia is between 12.6% and 45.1% depending on the company. The rate of duty on imports from Thailand is between 13.4% and 23.2%.

On 9 July 2021, the Australian authorities amended the definitive anti-dumping duty imposed in April 2017. The amended duty on imports from Brazil is 8.1%. The amended duty on imports from China ranges from 3% to 10%. The amended duty on imports from Indonesia ranges from 14.7 to 19.2%. The amended duty on imports from Thailand is 0.9%. The notice amending the definitive duty was issued on 9 July 2021.

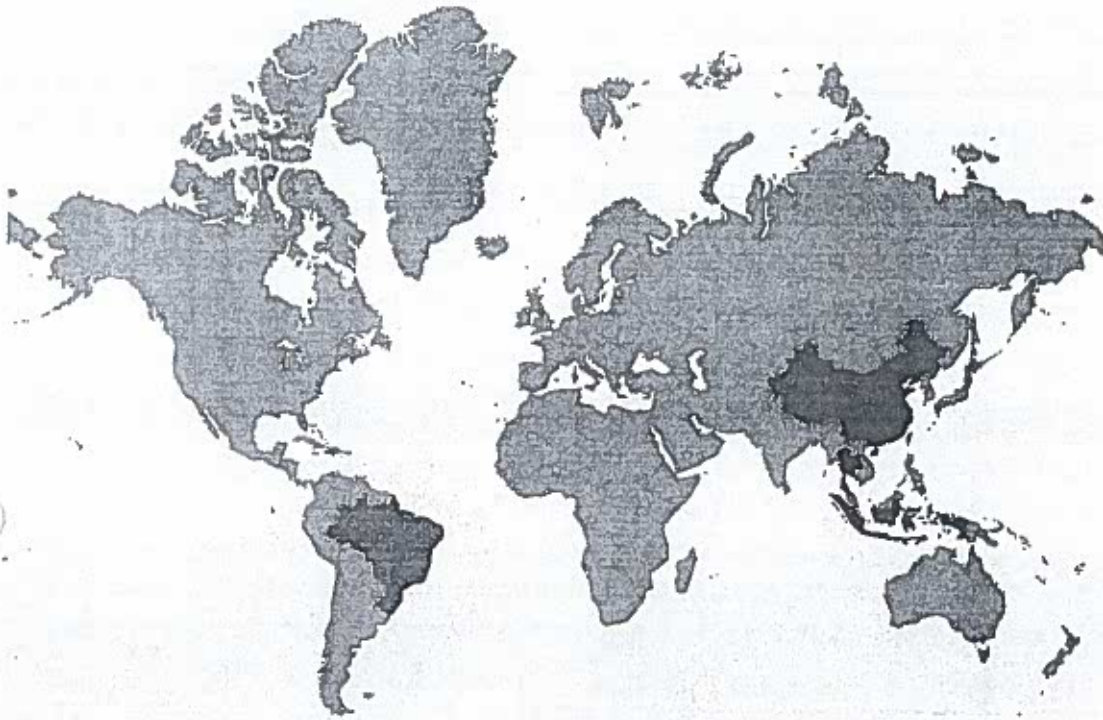
On 16 April 2020, the Australian authority announced the initiation of an administrative review of the definitive duty imposed on imports of the subject good from Brazil, China, Indonesia and Thailand.

On 2 July 2021 the Australian authority announced the initiation of a sunset review of the definitive duty imposed on imports of the subject good from Brazil, China, Indonesia and Thailand.

On 9 July 2021, the Australian authorities issued a regulation modifying the definitive duty imposed on imports of A4 copy paper exported from Brazil, China, Indonesia and Thailand following the conclusion of the administrative review. The rate of duty on imports from Brazil is 8.1%. The rate of duty on imports from China ranges from 3% to 10% depending on the company. The rate of duty on imports from Indonesia ranges from 14.7% to 19.2% depending on the company. The rate of duty on imports from Thailand is 0.9%.

PAGE 5/10

AFFECTED COUNTRIES (4)



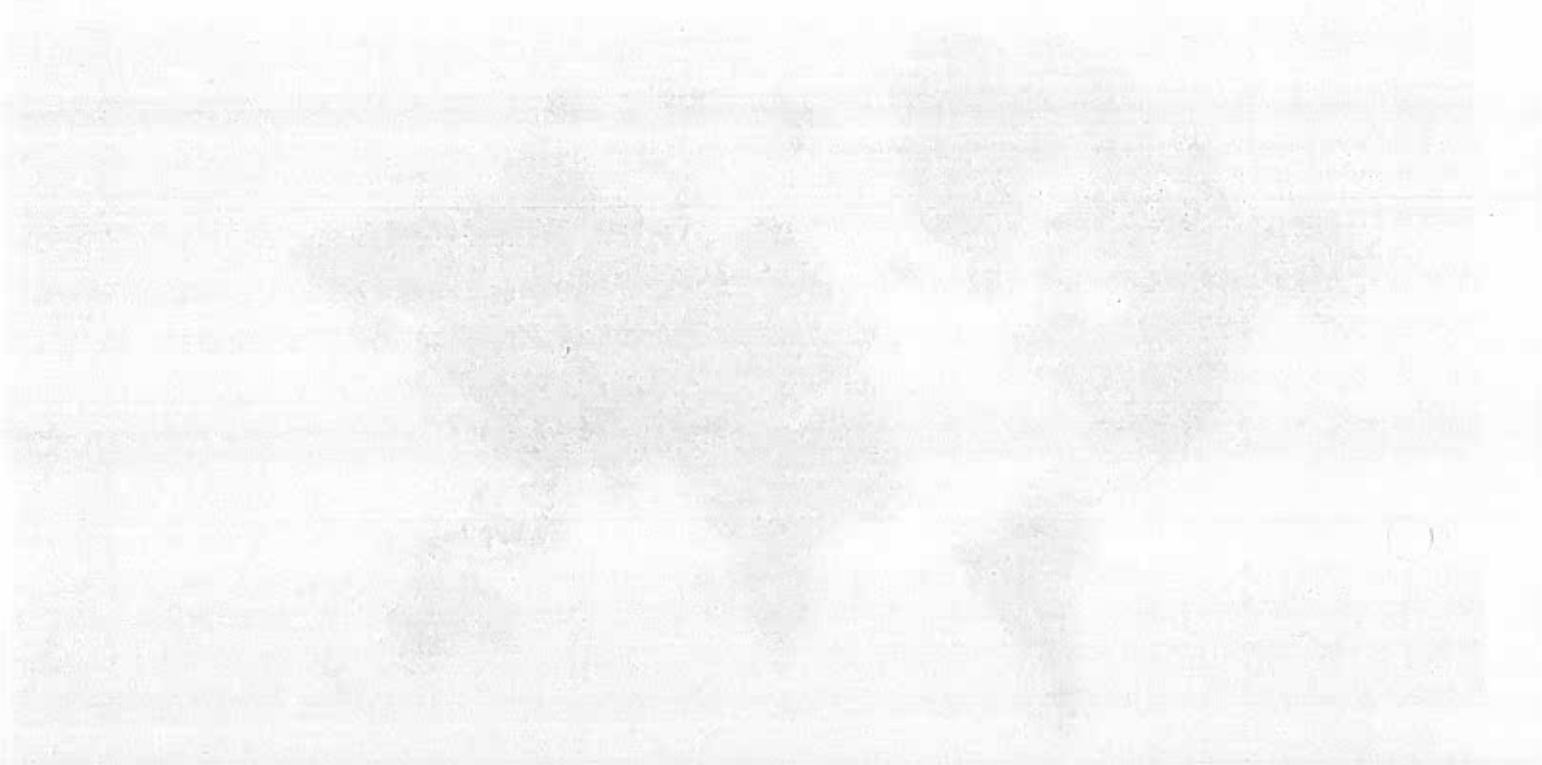
AFFECTED SECTORS AND PRODUCTS

321 Pulp, paper & paperboard

4802 Uncoated paper and paperboard, of a kind used for writing, printing or other graphic purposes, and non perforated punch cards and punch tape paper, in rolls or rectangular (including square) sheets, of any size, other than paper of heading 48.01 or 48.03

480256 Weighing 40 g/m² or more but not more than 150 g/m², in sheets with one side not exceeding 435 mm and the other side not exceeding 297 mm in the unfolded state

▶ Please [report this page](#) in case you detect an inaccuracy in its content.



REFLECTED BEAMS AND PRODUCTS

1987

1987
1987
1987
1987

1987
1987

1987

1987

Annexure-0

PAGE NO

ALPHACIN-C

**A-570-073 and C-570-074: Common Alloy Aluminum Sheet From China**

Requestor: Valeo Group and its affiliates. The T-series aluminum sheet imported by Valeo Group and its affiliates is covered by the scope of the antidumping and countervailing duty orders on common alloy aluminum sheet from China because it is a flat aluminum product having a thickness of 6.3 mm or less, but greater than 0.2 mm, is a multi-alloy, clad aluminum sheet produced from a 3XXX-series core. Commerce found that an unregistered alloy (*i.e.*, a proprietary alloy) is still covered by the scope of the orders if it corresponds to one of the one-digit alloy series identified in the scope language, *i.e.*, series 1XXX, 3XXX, or 5XXX; October 15, 2021.

Anti-Circumvention Made October 1, 2021, Through December 31, 2021

Brazil**A-351-842: Certain Uncoated Paper From Brazil**

Requestors: Domtar Corporation; Packaging Corporation of America; North Pacific Paper Company; Finch Paper LLC; and United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union. Certain uncoated paper rolls that are commonly, but not exclusively, known as "sheeter rolls" from Brazil that are further processed in the United States into individual sheets of uncoated paper are subject to the order (*i.e.*, paper that weighs at least 40 grams per square meter but not more than 150 grams per square meter; and that either is a white paper with a GE brightness level of 83 +/- 1% or higher or is a colored paper (as defined in the scope of the order)). The uncoated paper rolls covered by the order are converted into sheets of uncoated paper using specialized cutting machinery prior to printing, and are typically, but not exclusively, between 52 and 103 inches wide and 50 inches in diameter. These uncoated paper rolls are classified under HTSUS category 4802.55; December 14, 2021.

China**A-570-943 and C-570-944: Oil Country Tubular Goods From China**

Requestor: Self-initiated. Imports of welded oil country tubular goods completed in Brunei or the Philippines using inputs manufactured in China are circumventing the antidumping and countervailing duty orders on welded oil country tubular goods from China; November 26, 2021.

A-570-022 and C-570-023: Certain Uncoated Paper From China

Requestors: Domtar Corporation; Packaging Corporation of America; North Pacific Paper Company; Finch Paper LLC; and United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union. Certain uncoated paper rolls that are commonly, but not exclusively, known as "sheeter rolls" from China that are further processed in the United States into individual sheets of uncoated paper are subject to the order (*i.e.*, paper that weighs at least 40 grams per square meter but not more than 150 grams per square meter; and that either is a white paper with a GE brightness level of 83 +/- 1% or higher or is a colored paper (as defined in the scope of the order)). The uncoated paper rolls covered by the order are converted into sheets of uncoated paper using specialized cutting machinery prior to printing, and are typically, but not exclusively, between 52 and 103 inches wide and 50 inches in diameter. These uncoated paper rolls are classified under HTSUS category 4802.55; December 14, 2021.

Indonesia**A-560-828 and C-560-829: Certain Uncoated Paper From Indonesia**

Requestors: Domtar Corporation; Packaging Corporation of America; North Pacific Paper Company; Finch Paper LLC; and United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union. Certain uncoated paper rolls that are commonly, but not exclusively, known as "sheeter rolls" from Indonesia that are further processed in the United States into individual sheets of uncoated paper are subject to the order (*i.e.*, paper that weighs at least 40 grams per square meter but not more than 150 grams per square meter; and that either is a white paper with a GE brightness level of 83 +/- 1% or higher or is a colored paper (as defined in the scope of the order)). The uncoated paper rolls covered by the order are converted into sheets of uncoated paper using specialized cutting machinery prior to printing, and are typically, but not exclusively, between 52 and 103 inches wide and 50 inches in diameter. These uncoated paper rolls are classified under HTSUS category 4802.55; December 14, 2021.

Notification to Interested Parties

Interested parties are invited to comment on the completeness of this list of completed scope inquiries and anti-circumvention determinations

made during the period October 1, 2021 through December 31, 2021. Any comments should be submitted to the Deputy Assistant Secretary for AD/CVD Operations, Enforcement and Compliance, International Trade Administration, via email to CommerceCLU@trade.gov.

This notice is published in accordance with 19 CFR 351.225(o).

Dated: February 3, 2022.

James Maeder,

Deputy Assistant Secretary for Antidumping and Countervailing Duty Operations.

[FR Doc. 2022-02851 Filed 2-8-22; 8:45 am]

BILLING CODE 3510-05-P

DEPARTMENT OF COMMERCE**International Trade Administration**

[A-602-807; A-351-842; A-570-022; A-560-828; A-471-807; C-570-023; C-560-829]

Certain Uncoated Paper From Australia, Brazil, the People's Republic of China, Indonesia, and Portugal: Continuation of Antidumping Duty and Countervailing Duty Orders

AGENCY: Enforcement and Compliance, International Trade Administration, Department of Commerce.

SUMMARY: As a result of the determinations by the Department of Commerce (Commerce) and the International Trade Commission (ITC) that revocation of the antidumping duty (AD) orders on certain uncoated paper (uncoated paper) from Australia, Brazil, the People's Republic of China (China), Indonesia, and Portugal, and the countervailing duty (CVD) orders on uncoated paper from China and Indonesia, would likely lead to a continuation or recurrence of dumping, net countervailable subsidies, and material injury to an industry in the United States, Commerce is publishing a notice of continuation of these AD and CVD orders.

DATES: Applicable February 9, 2022.

FOR FURTHER INFORMATION CONTACT: Patrick Barton, AD/CVD Operations, Office III, Enforcement and Compliance, International Trade Administration, U.S. Department of Commerce, 1401 Constitution Avenue NW, Washington, DC 20230; telephone: (202) 482-0012.

SUPPLEMENTARY INFORMATION:

Background

On March 3, 2016, Commerce published AD orders on uncoated paper from Australia, Brazil, China, Indonesia, and Portugal, and CVD orders on uncoated paper from China and

7426 20

Indonesia.¹ On February 1, 2021, Commerce initiated the first five-year (sunset) reviews of the *Orders* pursuant to section 751(c) of the Tariff Act of 1930, as amended (the Act).² As a result of its reviews, Commerce determined that revocation of the *AD Orders* would likely lead to a continuation or recurrence of dumping and that revocation of the *CVD Orders* would likely lead to the continuation or recurrence of countervailable subsidies. Therefore, Commerce notified the ITC of the magnitude of the margins and net countervailable subsidy rates likely to prevail should the *Orders* be revoked.³ On February 3, 2022, the ITC published its determination, pursuant to section 751(c) of the Act, that revocation of the *Orders* would likely lead to a continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.⁴

Scope of the Orders

The scope of the *Orders* includes uncoated paper in sheet form; weighing at least 40 grams per square meter but not more than 150 grams per square meter; that either is a white paper with a GE brightness level 3 of 85 or higher or is a colored paper; whether or not surface-decorated, printed (except as described below), embossed, perforated, or punched; irrespective of the smoothness of the surface; and irrespective of dimensions (Certain Uncoated Paper).

¹ See *Certain Uncoated Paper from Australia, Brazil, Indonesia, the People's Republic of China, and Portugal: Amended Final Affirmative Antidumping Determinations for Brazil and Indonesia and Antidumping Duty Orders*, 81 FR 11174 (March 3, 2016) (*AD Orders*); see also *Certain Uncoated Paper from Indonesia and the People's Republic of China: Amended Final Affirmative Countervailing Duty Determination and Countervailing Duty Order (Indonesia) and Countervailing Duty Order (People's Republic of China)*, 81 FR 11187 (March 3, 2016) (*CVD Orders*) (collectively, *Orders*).

² See *Initiation of Five-Year (Sunset) Reviews*, 86 FR 7709 (February 1, 2021).

³ See *Uncoated Paper from Australia, Brazil, the People's Republic of China, Indonesia, and Portugal: Final Results of the Expedited First Sunset Reviews of the Antidumping Duty Orders*, 86 FR 29248 (June 1, 2021), and accompanying issues and Decision Memorandum (IDM); *Certain Uncoated Paper from Indonesia: Final Results of the Expedited Five-Year Sunset Review of the Countervailing Duty Order*; 86 FR 29243 (June 1, 2021), and accompanying IDM; and *Certain Uncoated Paper from the People's Republic of China: Final Results of the Expedited Five-Year Sunset Review of the Countervailing Duty Order*; 86 FR 30280 (June 7, 2021), and accompanying IDM.

⁴ See *Uncoated Paper from Australia, Brazil, China, Indonesia, and Portugal*, 87 FR 8203 (February 3, 2022); see also *Uncoated Paper from Australia, Brazil, China, Indonesia, and Portugal* (Inv. Nos. 701-TA-528-529 and 731-TA-1284-1286 (Review), USITC Publication 5275, January 2022).

Certain Uncoated Paper includes: (a) Uncoated free sheet paper that meets this scope definition; (b) uncoated ground wood paper produced from bleached chemi-thermo-mechanical pulp (BCTMP) that meets this scope definition; and (c) any other uncoated paper that meets this scope definition regardless of the type of pulp used to produce the paper.

Specifically excluded from the scope are: (1) Paper printed with final content of printed text or graphics; and (2) lined paper products, typically school supplies, composed of paper that incorporates straight horizontal and/or vertical lines that would make the paper unsuitable for copying or printing purposes. For purposes of this scope definition, paper shall be considered "printed with final content" where at least one side of the sheet has printed text and/or graphics that cover at least five percent of the surface area of the entire sheet.

On December 14, 2021, Commerce determined that imports of certain uncoated paper rolls that are commonly, but not exclusively, known as "sheeter rolls" from Brazil, China, and Indonesia that are further processed in the United States into individual sheets of uncoated paper that would be subject to the *Orders* (*i.e.*, paper that weighs at least 40 grams per square meter but not more than 150 grams per square meter; and that either is a white paper with a GE brightness level of 83 +/- 1% or higher or is a colored paper (as defined above)). The uncoated paper rolls covered by the scope of these *Orders* are converted into sheets of uncoated paper using specialized cutting machinery prior to printing, and are typically, but not exclusively, between 52 and 103 inches wide and 50 inches in diameter. For clarity, we herein refer to "subject-paper rolls" when referencing the certain uncoated paper rolls that may be converted into subject merchandise. Subject-paper rolls are classified under HTSUS category 4802.55.

Certain importers of the subject-paper rolls that are not converted into subject merchandise may certify that the rolls will not be further processed into subject merchandise covered by the scope of these *Orders*. Failure to comply with the requisite certification requirement may result in the merchandise being found subject to AD and CVD duties.⁵

⁵ See *Certain Uncoated Paper from Brazil, the People's Republic of China, and Indonesia: Affirmative Final Determinations of Circumvention of the Antidumping Duty Orders and Countervailing Duty Orders for Certain Uncoated Paper Rolls*, 86 FR 71025 (December 14, 2021).

Imports of the subject merchandise are provided for under Harmonized Tariff Schedule of the United States (HTSUS) categories 4802.55.1000, 4802.55.2000, 4802.55.3000, 4802.55.4000, 4802.55.6000, 4802.55.7020, 4802.55.7040, 4802.56.1000, 4802.56.2000, 4802.56.3000, 4802.56.4000, 4802.56.6000, 4802.56.7020, 4802.56.7040, 4802.57.1000, 4802.57.2000, 4802.57.3000, and 4802.57.4000. Some imports of subject merchandise may also be classified under 4802.62.1000, 4802.62.2000, 4802.62.3000, 4802.62.5000, 4802.62.6020, 4802.62.6040, 4802.69.1000, 4802.69.2000, 4802.69.3000, 4811.90.8050 and 4811.90.9080. While HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of the *Orders* is dispositive.

Continuation of the Orders

As a result of the determinations by Commerce and the ITC that revocation of the *Orders* would likely lead to a continuation or recurrence of dumping, countervailable subsidies, and material injury to an industry in the United States, pursuant to section 751(d)(2) of the Act, Commerce hereby orders the continuation of the AD orders on uncoated paper from Australia, Brazil, China, Indonesia, and Portugal, and the continuation of the CVD orders on uncoated paper from China and Indonesia. U.S. Customs and Border Protection will continue to collect AD and CVD cash deposits at the rates in effect at the time of entry for all imports of subject merchandise. The effective date of the continuation of the *Orders* will be the date of publication in the Federal Register of this notice of continuation. Pursuant to section 751(c)(2) of the Act, Commerce intends to initiate the next five-year reviews of the *Orders* not later than 30 days prior to the fifth anniversary of the effective date of continuation.

Administrative Protective Order

This notice also serves as the only reminder to parties subject to administrative protective order (APO) of their responsibility concerning the return/destruction or conversion to judicial protective order of proprietary information disclosed under APO in accordance with 19 CFR 351.305(a)(3). Failure to comply is a violation of the APO which may be subject to sanctions.

Notification to Interested Parties

These five-year (sunset) reviews and this notice are in accordance with

section 751(c) of the Act and published pursuant to section 777(i)(1) of the Act.

Dated: February 3, 2022.

Lisa W. Wang,
Assistant Secretary for Enforcement and Compliance.

[FR Doc. 2022-02686 Filed 2-8-22; 8:45 am]

BILLING CODE 3510-DS-P

DEPARTMENT OF COMMERCE

International Trade Administration

[A-570-896]

Magnesium Metal From the People's Republic of China: Final Results of Antidumping Duty Administrative Review; 2020-2021

AGENCY: Enforcement and Compliance, International Trade Administration, Department of Commerce.

SUMMARY: The Department of Commerce (Commerce) continues to find that Tianjin Magnesium International, Co., Ltd. (TMI) and Tianjin Magnesium Metal, Co., Ltd. (TMM) had no shipments of subject merchandise covered by the antidumping duty order on magnesium metal from the People's Republic of China (China) for the period of review (POR) April 1, 2020, through March 31, 2021.

DATES: Applicable February 9, 2022.

FOR FURTHER INFORMATION CONTACT: Deborah Cohen, AD/CVD Operations, Office III, Enforcement and Compliance, International Trade Administration, U.S. Department of Commerce, 1401 Constitution Avenue NW, Washington, DC 20230; telephone: (202) 482-4521.

SUPPLEMENTARY INFORMATION:

Background

On October 13, 2021, Commerce published the *Preliminary Results* of this administrative review in the *Federal Register*.¹ No interested party submitted comments concerning the *Preliminary Results* or requested a hearing in this administrative review. Commerce conducted this administrative review in accordance with section 751 of the Tariff Act of 1930, as amended (the Act).

Scope of the Order²

The product covered by the *Order* is magnesium metal from China, which

includes primary and secondary alloy magnesium metal, regardless of chemistry, raw material source, form, shape, or size. Magnesium is a metal or alloy containing by weight primarily the element magnesium. Primary magnesium is produced by decomposing raw materials into magnesium metal. Secondary magnesium is produced by recycling magnesium-based scrap into magnesium metal. The magnesium covered by the *Order* includes blends of primary and secondary magnesium. The subject merchandise includes the following alloy magnesium metal products made from primary and/or secondary magnesium including, without limitation, magnesium cast into ingots, slabs, rounds, billets, and other shapes; magnesium ground, chipped, crushed, or machined into rasping, granules, turnings, chips, powder, briquettes, and other shapes; and products that contain 50 percent or greater, but less than 99.8 percent, magnesium, by weight, and that have been entered into the United States as conforming to an "ASTM Specification for Magnesium Alloy"³ and are thus outside the scope of the existing antidumping orders on magnesium from China (generally referred to as "alloy" magnesium).

The scope of the *Order* excludes: (1) All forms of pure magnesium, including chemical combinations of magnesium and other material(s) in which the pure magnesium content is 50 percent or greater, but less than 99.8 percent, by weight, that do not conform to an "ASTM Specification for Magnesium Alloy;"⁴ (2) magnesium that is in liquid or molten form; and (3) mixtures containing 90 percent or less magnesium in granular or powder form by weight and one or more of certain non-magnesium granular materials to make magnesium-based reagent mixtures, including lime, calcium metal, calcium silicon, calcium carbide, calcium carbonate, carbon, slag coagulants, fluorspar, nepheline syenite, feldspar, alumina (Al₂O₃), calcium aluminate, soda ash, hydrocarbons, graphite, coke, silicon, rare earth

³ The meaning of this term is the same as that used by the American Society for Testing and Materials in its Annual Book for ASTM Standards: Volume 01.02 Aluminum and Magnesium Alloys.

⁴ The material is already covered by existing antidumping orders. See *Notice of Antidumping Duty Orders: Pure Magnesium from the People's Republic of China, the Russian Federation and Ukraine, Notice of Amended Final Determination of Sales at Less Than Fair Value: Antidumping Duty Investigation of Pure Magnesium from the Russian Federation*, 60 FR 25691 (May 12, 1995); and *Antidumping Duty Order: Pure Magnesium in Granular Form from the People's Republic of China*, 66 FR 57936 (November 19, 2001).

metals/mischmetal, cryolite, silica/fly ash, magnesium oxide, periclase, ferroalloys, dolomite lime, and colemanite.⁵ The merchandise subject to this *Order* is classifiable under items 8104.19.00, and 8104.30.00 of the Harmonized Tariff Schedule of the United States (HTSUS). Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the merchandise is dispositive.

Final Determination of No Shipments

In the *Preliminary Results*, Commerce determined TMI and TMM had no shipments of subject merchandise to the United States during the POR.⁶ As noted in the *Preliminary Results*, we received no-shipment statements from TMI and TMM,⁷ and the statements were consistent with the information we received from U.S. Customs and Border Protection (CBP).⁸ Because Commerce did not receive any comments on its preliminary finding, Commerce continues to find that TMI and TMM did not have any shipments of subject merchandise during the POR.

Assessment Rates

Based on record evidence, we have determined that TMI and TMM had no shipments of subject merchandise during the POR, and, therefore, pursuant to Commerce's assessment practice, any suspended entries entered under their case numbers will be liquidated at the China-wide entity rate.⁹

Commerce intends to issue assessment instructions to CBP no earlier than 35 days after the date of

⁵ This third exclusion for magnesium-based reagent mixtures is based on the exclusion for reagent mixtures in the 2000-2001 investigations of magnesium from China, Israel, and Russia. See *Final Determination of Sales at Less Than Fair Value: Pure Magnesium in Granular Form from the People's Republic of China*, 66 FR 49345 (September 27, 2001); see also *Final Determination of Sales at Less Than Fair Value: Pure Magnesium from Israel*, 66 FR 49349 (September 27, 2001); and *Final Determination of Sales at Not Less Than Fair Value: Pure Magnesium from the Russian Federation*, 66 FR 49347 (September 27, 2001). These mixtures are not magnesium alloys, because they are not combined in liquid form and cast into the same ingot.

⁶ See *Preliminary Results*, 66 FR at 56892.

⁷ *Id.*, 66 FR at 56893.

⁸ See Memorandum, "Antidumping Duty Administrative Review of Magnesium Metal from the People's Republic of China, 04/01/2020-03/31/2021: Entry Data and No Shipment Inquiry," dated July 14, 2021. On June 23, 2021, Commerce issued a no shipment inquiry to U.S. Customs and Border Protection (CBP) with respect to TMI and TMM. On July 6, 2021, CBP responded that it had no evidence of shipments of magnesium metal from China exported by TMI and TMM during the POR.

⁹ See *Non-Market Economy Antidumping Proceedings: Assessment of Antidumping Duties*, 76 FR 65694 (October 24, 2011).

PAGE NO.

<p>1. The first section of the document discusses the importance of maintaining accurate records for all transactions. It emphasizes that every entry must be supported by a valid receipt or invoice to ensure transparency and accountability.</p> <p>2. The second section outlines the specific procedures for recording income and expenses. It details how to categorize different types of transactions and provides examples of how to correctly enter data into the accounting system.</p> <p>3. The third section addresses the process of reconciling bank statements with the company's internal records. It explains the steps to identify and resolve any discrepancies, ensuring that the books are balanced and accurate.</p>	<p>4. The fourth section discusses the role of the accounting department in providing financial insights to management. It highlights how regular reporting and analysis can help identify trends, control costs, and improve overall business performance.</p> <p>5. The fifth section covers the requirements for external audits and the importance of maintaining a clean audit trail. It provides guidance on how to prepare for an audit and how to respond to any findings or recommendations.</p> <p>6. The sixth section discusses the use of technology in modern accounting. It explores how software solutions can streamline processes, reduce errors, and provide real-time access to financial data.</p>	<p>7. The seventh section discusses the importance of staying up-to-date with changes in tax laws and regulations. It emphasizes the need for continuous education and professional development for all accounting staff.</p> <p>8. The eighth section provides a summary of the key points discussed in the document and offers final thoughts on the importance of a strong financial foundation for long-term success.</p>
<p>9. The ninth section discusses the importance of maintaining accurate records for all transactions. It emphasizes that every entry must be supported by a valid receipt or invoice to ensure transparency and accountability.</p> <p>10. The tenth section outlines the specific procedures for recording income and expenses. It details how to categorize different types of transactions and provides examples of how to correctly enter data into the accounting system.</p> <p>11. The eleventh section addresses the process of reconciling bank statements with the company's internal records. It explains the steps to identify and resolve any discrepancies, ensuring that the books are balanced and accurate.</p>	<p>12. The twelfth section discusses the role of the accounting department in providing financial insights to management. It highlights how regular reporting and analysis can help identify trends, control costs, and improve overall business performance.</p> <p>13. The thirteenth section covers the requirements for external audits and the importance of maintaining a clean audit trail. It provides guidance on how to prepare for an audit and how to respond to any findings or recommendations.</p> <p>14. The fourteenth section discusses the use of technology in modern accounting. It explores how software solutions can streamline processes, reduce errors, and provide real-time access to financial data.</p>	<p>15. The fifteenth section discusses the importance of staying up-to-date with changes in tax laws and regulations. It emphasizes the need for continuous education and professional development for all accounting staff.</p> <p>16. The sixteenth section provides a summary of the key points discussed in the document and offers final thoughts on the importance of a strong financial foundation for long-term success.</p>

Annexure-P

1-2-1984

1

1

219 3/2/84

▲ Mexico: Extension of definitive antidumping duties on imports of bond paper from Brazil

INVESTIGATION PROGRESS		IMPLEMENTATION LEVEL	AFFECTED FLOW
Date	Status	National	Inflow
25 Mar 2019	Renewal		
05 Mar 2018	Review		
12 Mar 2013	Definitive duty		
14 Aug 2012	Preliminary duty		
12 Oct 2011	Initiation		

ANNOUNCED AS TEMPORARY	NON-TRADE-RELATED RATIONALE	ELIGIBLE FIRMS
No	No	all

JUMBO	TARIFF PEAK
No	No

 back to the state act

Inception date: 04 Aug 2012 | Removal date: open ended

▲ Anti-dumping

On 11 October 2011, the Government of Mexico initiated an anti-dumping investigation on bond paper, weighing 40 g/m² or more but not more than 150 g/m², in sheets with one side not exceeding 435 mm and the other side not exceeding 297 mm in the unfolded state, from Brazil.

This investigation was requested by Bio Pappel Printing S.A. de C.V., Grupo Papelero Scribe S.A. de C.V., Michoacana Industrial Papelera S.A. de C.V., and Pondercel S.A. de C.V. These Mexican enterprises account for 100% of Mexico's production of this type of paper.

The product subject to investigation is classified under the following item of Mexico's Harmonized System: 4802.56.01 and 4823.9099.

In accordance with the Mexican legislation, 90 days after the initiation of the investigation the authorities must issue a preliminary determination: (a) adopting preliminary anti-dumping duties, (b) announcing the continuance of the investigation without imposing preliminary duties or (c) concluding the investigation due to lack of evidence.

In all cases, 210 days after the initiation of the procedures the Mexican authorities must issue a final determination. Through this decision, the Government will announce if this kind of products from Brazil will face final anti-dumping duties.

On 3 August 2012, the Government imposed provisional duties on imports of the subject product, with the dumping margin calculated as between 51.29 and 62.37%.

On 11 March 2013, the Government of Mexico adopted anti-dumping duties against imports of bond paper from Brazil. The measure consists of anti-dumping duties of 37.78% for all imports of bond paper from Brazil.

On 6 March 2018, the Mexican authorities initiated a sunset review of the antidumping duty imposed on imports of the subject good from Brazil. This review follows the request lodged on 26 January 2018 by Bio Pappel Scribe, S.A. de C.V. and Pondercel, S.A. de C.V. The existing anti-dumping measure remains in force during the review. The Resolution was issued on 5 March 2018.

On 25 March 2019, the Mexican authorities extended the definitive duty imposed on imports of certain bond paper from Brazil following the conclusion of the above sunset review. The rate of duty is 37.78%. The duty is in force for a period of five years retrospectively in force from 12 March 2018.

AFFECTED COUNTRIES (1)



AFFECTED SECTORS AND PRODUCTS

321

Pulp, paper & paperboard

PAGE NO

4802 Uncoated paper and paperboard, of a kind used for writing, printing or other graphic purposes, and non perforated punch cards and punch tape paper, in rolls or rectangular (including square) sheets, of any size, other than paper of heading 48.01 or 48.03

480256 Weighing 40 g/m² or more but not more than 150 g/m², in sheets with one side not exceeding 435 mm and the other side not exceeding 297 mm in the unfolded state

4823 Other paper, paperboard, cellulose wadding and webs of cellulose fibres, cut to size or shape; other articles of paper pulp, paper, paperboard, cellulose wadding or webs of cellulose fibres.

482390 Other

▶ Please report this page in case you detect an inaccuracy in its content.

Faint, illegible text at the top of the page, possibly a header or introductory paragraph.

Main body of faint, illegible text, appearing to be several paragraphs of a document.

On 1/1/19

Annexure-Q

PAGE NO

Annexure-0



MoverDB.com

US: 1-888-573-8609
UK: +44 203 885 2990

I am moving **from**
Enter your own postcode, address, or city..

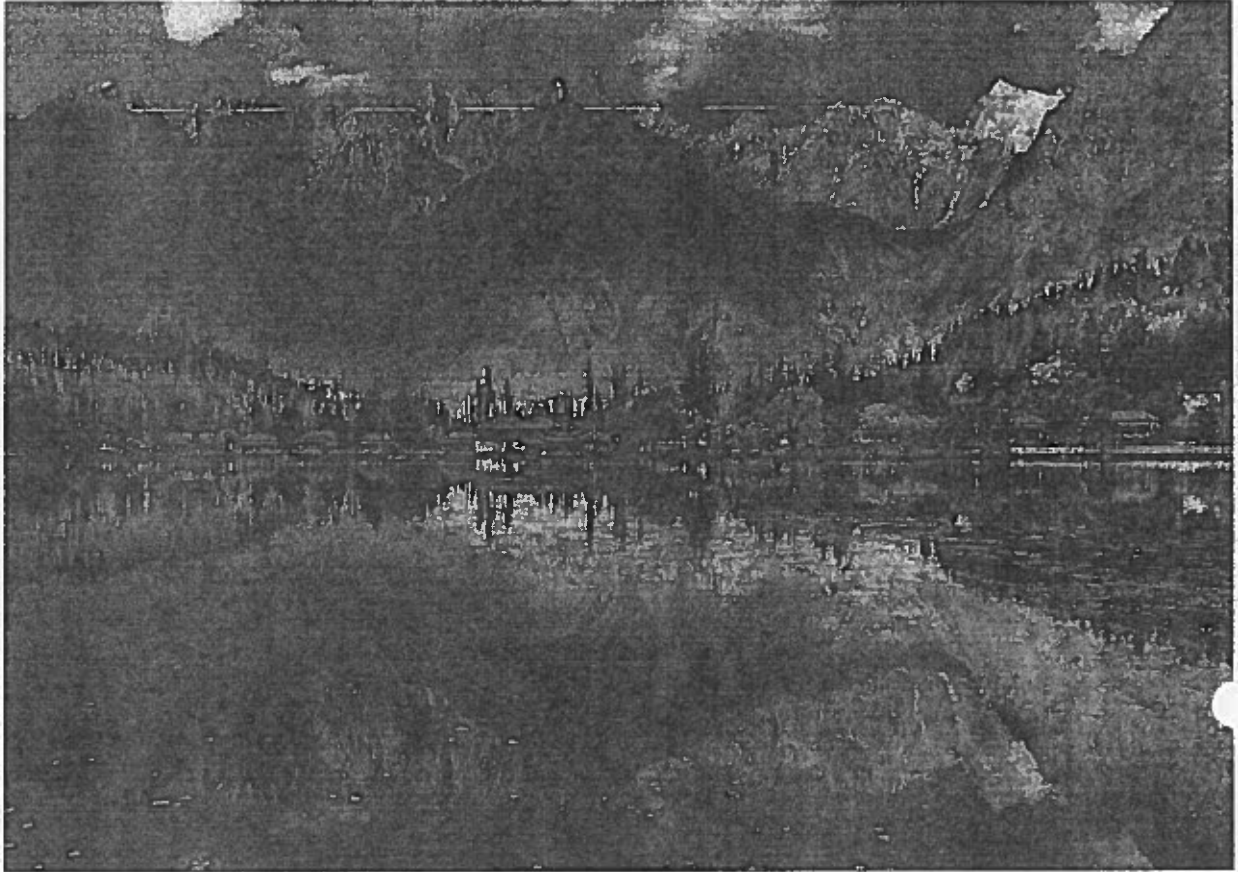
I am moving **to**
Enter the address or city..

REQUEST QUOTES

2023 Sea Freight Container Shipping Rates To & From Pakistan

PAGE NO

 English



If you crave something different, **Pakistan** might be a decent choice to spend a part of your life in. The country is usually not among the top choices when it comes to desirable expat destinations, but it certainly has a lot to offer.

Primarily, Pakistan is attractive because it possesses unmatched natural beauty and of a very low cost of living – it's one of the cheapest places on Earth. Additionally, Pakistan's culture is rich and people are warm and friendly.

On top of that, moving to Pakistan is fairly easy as the country has a big sea port that allows freight shipping. To transport your household items via this type of shipping, you can hire a 20-foot or 40-foot shipping container to Karachi.

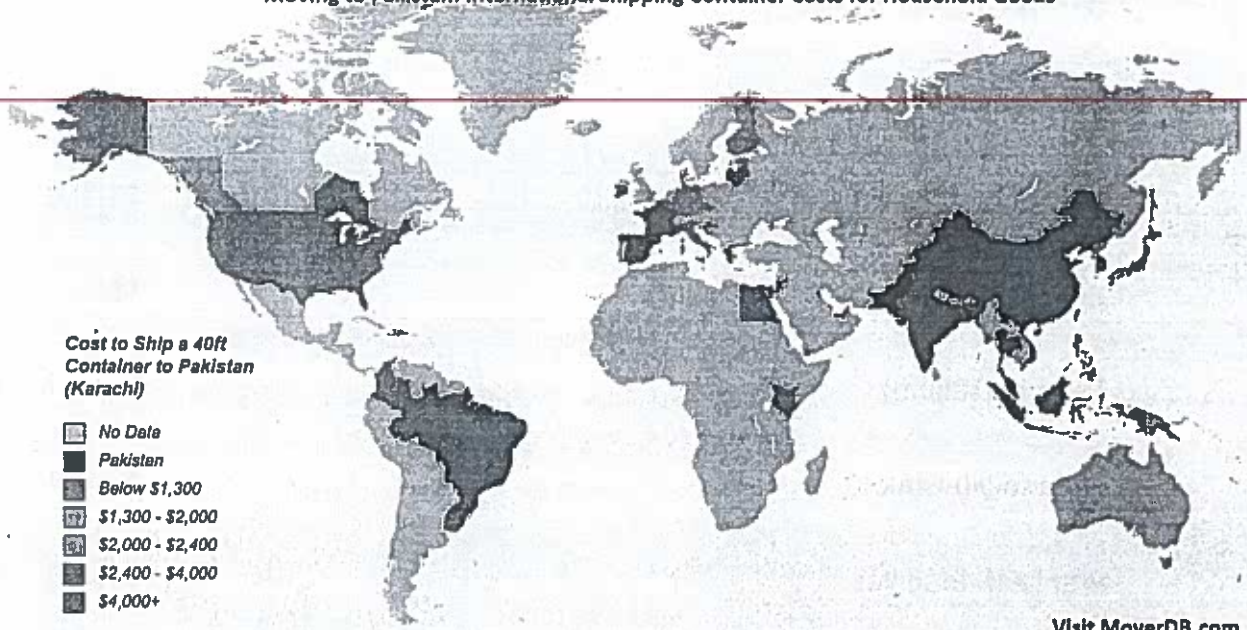
The tables below explain the lowest Pakistan container shipping rates. If you want to go one step further, you can use our quote tool and seek a custom quote for your home location.

Shipping Container Costs to Pakistan (Karachi)

PAGE 10

English

Moving to Pakistan: International Shipping Container Costs for Household Goods



Visit MoverDB.com

DESTINATION COUNTRY (PORT/CITY)	20FT	40FT
Andorra (Andorra la Vella)	\$1,864	\$2,318
Antigua and Barbuda (St John's)	\$814	\$1,298
Bahrain (Manama)	\$1,045	\$1,995
Bangladesh (Chittagong)	\$3,808	N/A
Belgium (Antwerp)	\$2,512	\$2,208
Brazil (Santos)	\$5,500	\$5,250
British Virgin Islands (Road Town)	\$1,133	\$1,586
Canada (Toronto)	\$1,626	\$1,225
Canada (Vancouver)	\$1,258	\$1,628
China (Beijing)	\$2,371	\$3,777
China (Shanghai)	\$2,755	\$4,314
Colombia (Barranquilla)	\$688	\$809
Croatia (Rijeka)		\$1,021

Czech Republic (Prague)	\$2,001	\$1,389
Denmark (Copenhagen)	\$1,243	\$1,628
Dominican Republic (Santo Domingo)	\$1,760	\$2,457
Egypt (Alexandria)	\$605	\$840
Estonia (Tallinn)	\$2,211	\$2,300
Finland (Helsinki)	\$2,121	\$2,300
France (Marseilles)	\$1,493	\$1,200
Germany (Hamburg)	\$1,991	\$2,021
Gibraltar	\$1,155	\$1,575
Greece (Piraeus)	\$880	\$1,019
Guernsey (St Peter Port)	\$1,953	\$1,759
Haiti (Port-au-Prince)	\$1,760	\$2,457
Hong Kong (Hong Kong)	\$2,200	\$3,360
India (Mumbai)	\$660	\$1,155
Indonesia (Jakarta)	\$2,420	\$3,360
Ireland (Dublin)	\$1,727	\$1,838
Isle of Man (Douglas)	\$1,727	\$1,838
Italy (Trieste)	\$1,755	\$2,162
Japan (Tokyo)	\$2,811	\$4,197
Jersey (St Helier)	\$1,953	\$1,759
Jordan (Aqaba)	\$1,594	\$1,594

 English

Kenya (Mombasa)	\$297	\$300
Kuwait (Shuwaikh)	\$484	\$551
Latvia (Riga)	\$2,255	\$2,654
Liechtenstein (Vaduz)	\$1,755	\$2,224
Lithuania (Klaipeda)	\$2,151	\$2,654
Luxembourg	\$2,063	\$2,018
Malaysia (Port Kelang)	\$2,420	\$4,104
Philippines (Manila)	\$2,120	\$4,330
Qatar (Doha)	\$1,045	\$2,052
Singapore	\$1,100	\$1,404
South Korea (Busan)	\$3,960	\$5,940
Spain (Valencia)	\$2,244	\$2,430
Taiwan (Kaohsiung)	\$4,140	\$5,160
Thailand (Laem Chabang)	\$1,650	\$3,780
UAE (Jebel Ali)	\$770	\$575
Uruguay (Montevideo)	\$3,922	\$3,921
US (Los Angeles)	\$835	\$1,035
US (New York)	\$1,381	\$1,237
Vietnam (Saigon)	\$1,760	\$3,456

Shipping Container Costs from Pakistan (Karachi)

Moving from Pakistan: International Shipping Container Costs for Household Goods



DESTINATION COUNTRY (PORT/CITY)	20FT	40FT
Andorra (Andorra la Vella)	\$7,599	\$13,579
Antigua and Barbuda (St John's)	\$9,396	\$12,200
Argentina (Buenos Aires)	\$9,373	\$11,660
Aruba (Oranjestad)	\$9,373	\$11,660
Australia (Sydney)	\$2,511	\$12,312
Austria (Vienna)	N/A	\$12,750
Bahrain (Manama)	\$1,540	\$3,024
Bangladesh (Chittagong)	\$1,870	\$3,609
Belgium (Antwerp)	\$6,600	\$7,236
Belize (Belize City)	\$2,662	\$4,431
Brazil (Santos)	\$	English 994

British Virgin Islands (Road Town)	\$5,632	\$5,586
Canada (Toronto)	\$12,018	\$14,852
Canada (Vancouver)	\$15,950	\$18,900
Chile (San Antonio)	\$2,178	\$2,757
China (Beijing)	\$253	\$452
China (Shanghai)	\$440	\$420
Colombia (Barranquilla)	\$7,057	\$5,896
Costa Rica (Limon)	\$4,015	\$4,200
Croatia (Rijeka)	\$2,668	\$3,413
Cyprus (Limassol)	\$1,617	\$2,880
Czech Republic (Prague)	\$6,129	\$21,150
Denmark (Copenhagen)	\$7,300	N/A
Dominican Republic (Santo Domingo)	\$2,321	\$4,106
Egypt (Alexandria)	\$2,341	\$2,502
Estonia (Tallinn)	\$1,562	\$1,733
Finland (Helsinki)	\$1,562	\$1,733
France (Marseilles)	\$2,425	\$2,885
Germany (Hamburg)	\$7,000	N/A
Gibraltar	\$3,131	\$3,812
Greece (Piraeus)	\$1,936	\$1,938
Guatemala (Guatemala City)	\$1,746	

 English

Guernsey (St Peter Port)	\$7,260	\$7,350
Haiti (Port-au-Prince)	\$2,321	\$4,106
Hong Kong (Hong Kong)	\$358	\$525
Iceland (Reykjavik)	\$2,233	\$2,793
Indonesia (Jakarta)	\$825	\$683
Ireland (Dublin)	\$2,283	\$3,203
Isle of Man (Douglas)	\$2,668	\$3,413
Israel (Haifa)	\$2,063	\$2,880
Italy (Trieste)	\$2,668	\$3,413
Japan (Tokyo)	\$544	\$384
Jersey (St Helier)	\$7,260	\$7,350
Jordan (Aqaba)	\$796	\$509
Kenya (Mombasa)	\$4,400	\$6,156
Kuwait (Shuwaikh)	\$2,152	\$4,212
Latvia (Riga)	\$1,540	\$2,160
Lebanon (Beirut)	\$1,617	\$2,657
Liechtenstein (Vaduz)	\$1,788	\$2,376
Lithuania (Klaipeda)	\$2,860	\$3,780
Luxembourg	\$7,260	\$7,560
Malaysia (Port Kelang)	\$193	\$216
Maldives (Male)	\$7,400	\$1,200

 English

Monaco	\$5,830	\$6,480
Netherlands (Rotterdam)	\$6,600	\$7,236
Nigeria (Lagos)	\$5,655	\$7,082
Qatar (Doha)	\$1,265	\$2,268
Saudi Arabia (Jeddah)	\$2,300	\$2,375
Singapore	\$55	\$108
South Africa (Durban)	\$4,840	\$6,804
South Korea (Busan)	\$1,080	\$1,855
Spain (Valencia)	\$4,512	\$6,142
Switzerland (Geneva)	\$5,830	\$6,372
Taiwan (Kaohsiung)	\$808	\$1,586
Tanzania (Dar es Salaam)	\$4,950	\$6,696
Thailand (Laem Chabang)	\$55	\$105
Trinidad and Tobago (Port of Spain)	\$9,839	\$10,678
UAE (Jebel Ali)	\$550	\$972
US (Los Angeles)	\$5,062	\$6,048
US (New York)	\$8,637	\$11,160
Vietnam (Saigon)	\$1,210	\$1,458

Notes about data:

- All \$ figures in United States Dollars (USD);
- Rates accurate as of late 2022;

PAGE NO

English

- The maps in this article were created using <https://www.mapchart.net> You are free share the maps so long as you provide an attribution link back to MoverDB;
- The rates above are estimates only and may have changed since the time this arti was published (September 2022). They are based on the lowest estimated rate fr either <https://www.searates.com> or <https://www.gocomet.com>;
- To get a more accurate idea of the cost for you, please use the quote form at the of this page;
- Please also see our guide to international container shipping.

Moving internationally? Receive up to 5 FREE quotes!

1 2 3 **Get a quote**

Fill in the form and you will receive up to 5 free quotes from moving companies.

Where are you moving from?

I am moving from*

Enter your ZIP code, address or city

Where are you moving to?

I am moving to*


Enter your ZIP code, address or city

Continue

SEARCH THIS WEBSITE

PAGE NO



 English

2023 International Container Shipping Rates & Costs



Top 25 International Moving Companies Online



International Moving Costs: 9 Things You Can't Ignore



Freight Forwarder & NVOCC International Cost & Companies Guide

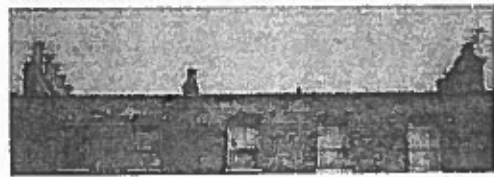


International Moving Quotes: 12 Questions To Ask Your Mover

 English



Top 10 International Container Shipping Companies



Top 13 International Removals Companies In The UK

Compare International Moving Quotes

Select countries

I am moving from

- select country -

I am moving to

- select country -

 English

PAGE NO



[BLOG](#) · [ABOUT](#) · [CONTACT](#) · [PRIVACY POLICY](#) · [TERMS OF USE](#) · [FACEBOOK](#) · [TWITTER](#)
COPYRIGHT © 2023 MOVERDB.COM

PAGE NO

