

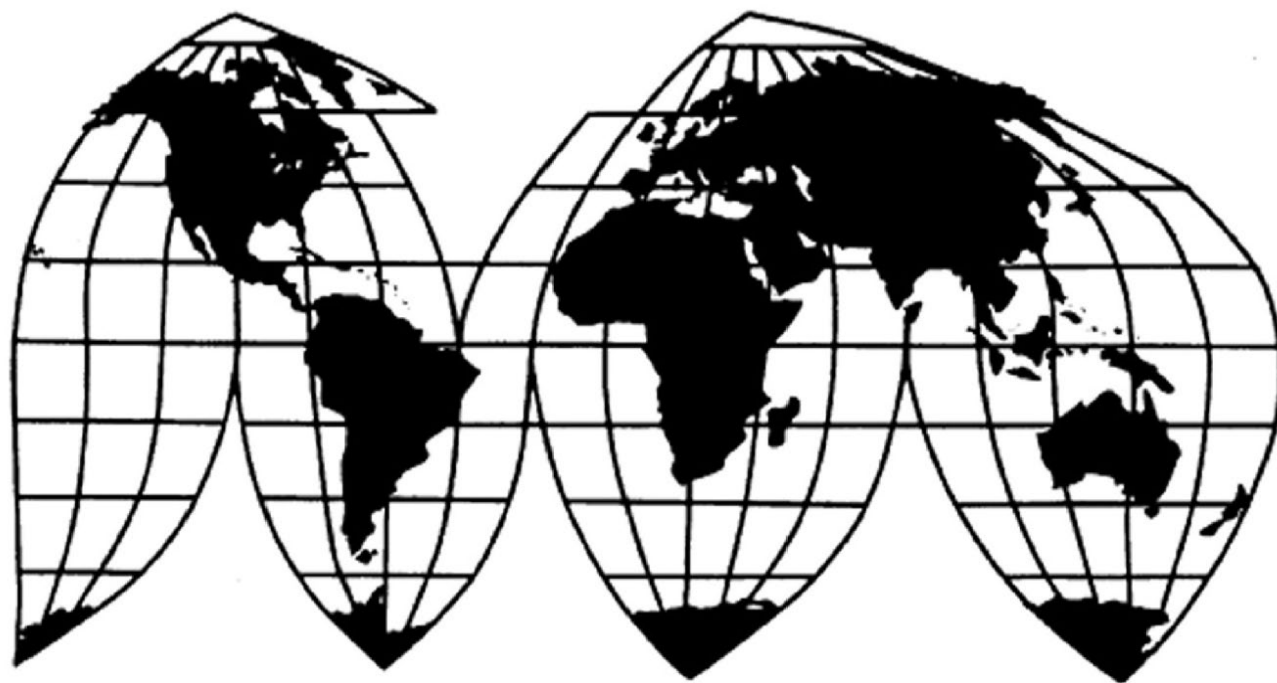
Hexamine (Hexamethylenetetramine) from Germany, India, and Saudi Arabia

Investigation Nos. 701-TA-738 and 731-TA-1713–1715 (Final)

Publication 5693

December 2025

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

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Note.—Information that would reveal confidential operations of individual firms may not be published. Such information is identified by brackets ([]) in confidential reports and is deleted and replaced with asterisks (***) in public reports. Zeroes, null values, and undefined calculations are suppressed and shown as em dashes (—) in tables. If using a screen reader, we recommend increasing the verbosity setting.

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-738 and 731-TA-1713–1715 (Final)

Hexamine (Hexamethylenetetramine) from Germany, India, and Saudi Arabia

DETERMINATIONS

On the basis of the record¹ developed in the subject investigations, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that an industry in the United States is materially injured by reason of imports of hexamine from Germany, India, and Saudi Arabia, provided for in subheading 2933.69.50 of the Harmonized Tariff Schedule of the United States, that have been found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value (“LTFV”) and subsidized by the government of India.^{2 3 4}

BACKGROUND

The Commission instituted these investigations effective September 30, 2024, following receipt of petitions filed with the Commission and Commerce by Bakelite Synthetics (Atlanta, Georgia). The Commission scheduled the final phase of the investigations following notification of preliminary determinations by Commerce that imports of hexamine from China were subsidized within the meaning of section 703(b) of the Act (19 U.S.C. 1671b(b)) and sold at LTFV within the meaning of section 733(b) of the Act (19 U.S.C. 1673b(b)). Notice of the scheduling of the final phase of the Commission’s investigations 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

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

² 90 FR 45728, 45725, 45723, and 45720 (September 23, 2025).

³ Commissioner David S. Johanson determines that an industry in the United States is threatened with material injury by reason of imports of hexamine from Germany, India, and Saudi Arabia that have been found by Commerce to be sold in the United States at LTFV and subsidized by the government of India.

⁴ The Commission also finds that imports subject to Commerce’s affirmative critical circumstances determinations with respect to Germany and India are not likely to undermine seriously the remedial effect of the antidumping duty order on hexamine from Germany or the antidumping duty and countervailing duty orders on hexamine from India.

Federal Register on May 22, 2025 (90 FR 21948 and as revised in 90 FR 31241, July 14, 2025). The Commission conducted its hearing on July 18, 2025. All persons who requested the opportunity were permitted to participate.

The investigation schedules became staggered when Commerce did not align its antidumping and countervailing duty investigations with respect to China with its antidumping duty investigations with respect to Germany, India, and Saudi Arabia, and its countervailing duty investigation with respect to India, and reached earlier final antidumping and countervailing duty determinations with respect to China. On September 3, 2025, the Commission issued final affirmative determinations in its antidumping and countervailing duty investigations of hexamine from China (90 FR 43234, September 8, 2025). Following notification of final determinations by Commerce that imports of hexamine from Germany, India, and Saudi Arabia were being sold at LTFV within the meaning of section 735(a) of the Act (19 U.S.C. 1673d(a)) and that imports of hexamine from India were being subsidized within the meaning of section 703(b) of the Act (19 U.S.C. 1671b(b)), notice of the supplemental scheduling of the final phase of the Commission's antidumping duty investigations with respect to Germany, India, and Saudi Arabia and its countervailing duty investigation with respect to India 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 October 1, 2025 (90 FR 47327).⁵

⁵ Due to the lapse in appropriations and ensuing cessation of Commission operations, the Commission tolled its schedule for this proceeding. The schedule was revised in a subsequent notice published in the *Federal Register* on November 20, 2025 (90 FR 52436).

Views of the Commission

Based on the record in the final phase of these investigations, we determine that an industry in the United States is materially injured by reason of imports of hexamethylenetetramine (“hexamine”) from Germany, India, and Saudi Arabia found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value (“LTFV”) and imports of hexamine from India found by Commerce to be subsidized by the government of India.¹ We also find that critical circumstances do not exist with respect to imports of hexamine from India that are subject to Commerce’s final affirmative critical circumstances determinations in its countervailing duty investigation and with respect to imports of hexamine from Germany and India that are subject to Commerce’s final affirmative critical circumstances determinations in its antidumping duty investigations.

I. Background

Although the antidumping duty petitions for hexamine from China, Germany, India, and Saudi Arabia and the countervailing duty petitions for hexamine from China and India were all filed on the same day, September 30, 2024, the investigation schedules became staggered when Commerce did not postpone the final determinations for its antidumping and countervailing duty investigations regarding China,² but did postpone its final determinations for its antidumping duty investigations regarding the other three subject countries,³ and aligned the final determination for its countervailing duty investigation regarding India with that of its corresponding antidumping duty investigation.⁴ This necessitated earlier

¹ As explained below, Commissioner Johanson finds instead that an industry in the United States is threatened with material injury by reason of imports of hexamine from Germany, India, and Saudi Arabia. He joins Sections I and II of the Commission’s opinion below but not Sections III-V.

² *Hexamethylenetetramine From the People’s Republic of China: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination*, 90 Fed. Reg. 11,508 (Mar. 7, 2025).

³ *Hexamethylenetetramine From India: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination and Extension of Provisional Measures*, 90 Fed. Reg. 19,178 (May 6, 2025); *Hexamethylenetetramine From the Kingdom of Saudi Arabia: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures*, 90 Fed. Reg. 19,180 (May 6, 2025); *Hexamethylenetetramine From Germany: Preliminary Affirmative Determination of Sales at Less-Than-Fair-Value, Postponement of Final Determination, and Extension of Provisional Measures*, 90 Fed. Reg. 19,186 (May 6, 2025).

⁴ *Hexamethylenetetramine From India: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination*, 90 Fed. Reg. 11,512, 11,514 (March 7, 2025).

(Continued...)

Commission determinations in the final phase antidumping and countervailing duty investigations on hexamine from China than in the trailing investigations.⁵ The Commission reached affirmative determinations in those leading investigations on September 3, 2025.⁶

Pursuant to the statutory provision on staggered investigations, the record for the current trailing investigations regarding hexamine from Germany, India, and Saudi Arabia closed on August 11, 2025, except that Commerce’s final antidumping duty determinations on subject imports of hexamine from Germany, India, and Saudi Arabia and final countervailing duty determination on subject imports of hexamine from India have been added to the record.⁷

Commerce also aligned its countervailing duty investigation regarding China with that of its corresponding antidumping duty investigation. *Hexamethylenetetramine From the People's Republic of China: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination*, 90 Fed. Reg. 11,508 (Mar. 7, 2025).

⁵ Commerce issued its final antidumping duty determinations in the trailing investigations regarding Germany, India, and Saudi Arabia, and final countervailing duty determination in the trailing investigation regarding India on September 23, 2025. See *Hexamethylenetetramine From India: Final Affirmative Countervailing Duty Determination and Final Affirmative Critical Circumstances Determination, in Part*, 90 Fed. Reg. 45,720 (Sept. 23, 2025); *Hexamethylenetetramine From the Kingdom of Saudi Arabia: Final Affirmative Determination of Sales at Less Than Fair Value and Final Negative Determination of Critical Circumstances*, 90 Fed. Reg. 45,723 (Sept. 23, 2025); *Hexamethylenetetramine from India: Final Affirmative Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 90 Fed. Reg. 45,725 (Sept. 23, 2025); *Hexamethylenetetramine From Germany: Final Affirmative Determination of Sales at Less-Than-Fair-Value and Final Affirmative Determination of Critical Circumstances*, 90 Fed. Reg. 45,728 (Sept. 23, 2025).

⁶ *Hexamine (Hexamethylenetetramine) From China*, 90 Fed. Reg. 43,234 (Sept. 8, 2025).

⁷ See 19 U.S.C. § 1677(7)(G)(iii). Consistent with the statute, imports of hexamine from China subject to the affirmative determination in the leading investigations remain eligible for cumulation for purposes of the trailing investigations on hexamine from Germany, India, and Saudi Arabia. See *Grain-Oriented Electrical Steel from China, Czech Republic, Korea, and Russia*, Inv. Nos. 701-TA-505, 731-TA-1231-32, 1235, and 1237 (Final), USITC Pub. 4500 at 4-5 (Nov. 2014); *Certain Steel Threaded Rod from India*, Inv. Nos. 701-TA-498, 731-TA-1213 (Final), USITC Pub. 4487 at 4-5 (Aug. 2014). The statutory provisions concerning investigations that start out together, but then become staggered, were designed to ensure that cumulation is based on the petition filing date, not the date of the ultimate vote. The statute provides that, in the subsequent investigations, the Commission shall make its determination “based on the record compiled in the first investigation in which it makes a final determination,” with the addition of information and argument on Commerce’s final margins for the later investigations. See 19 U.S.C. § 1677(7)(G)(iii). This provision enables the Commission to continue to cumulate subject imports in the later investigations, using the record (properly modified) compiled in the leading investigation(s).

Parties did not file supplemental comments on Commerce’s final antidumping and countervailing duty determinations.⁸

II. Negligible Imports

Pursuant to Section 771(24) of the Tariff Act, imports from a subject country of merchandise corresponding to a domestic like product that account for less than 3 percent of all such merchandise imported into the United States during the most recent 12 months for which data are available preceding the filing of the petition shall generally be deemed negligible.⁹ The statute further provides that subject imports from a single country which comprise less than 3 percent of total such imports of the product may not be considered negligible if there are several countries subject to investigation with negligible imports and the sum of such imports from all those countries collectively accounts for more than 7 percent of the volume of all such merchandise imported into the United States.¹⁰ In the case of countervailing duty investigations involving developing countries (as designated by the United States Trade Representative), the statute indicates that the negligibility limits are 4 percent and 9 percent, rather than 3 percent and 7 percent.¹¹

As previously stated, the petitions for the antidumping duty investigations on hexamine from Germany, India, and Saudi Arabia and the countervailing duty investigation of hexamine from India were filed on the same day, September 30, 2024. Based on questionnaire responses, during the most recent 12-month period for which data are available preceding the filing of the petitions, September 2023 through August 2024, subject imports from Germany accounted for *** percent of total imports, subject imports from India accounted for *** percent of total imports, and subject imports from Saudi Arabia accounted for *** percent of total imports.¹² Because subject imports from Germany, India, and Saudi Arabia exceed the

⁸ Supplemental Confidential Report, INV-XX-138 (Dec. 2, 2025) (“Supplemental CR”) at 1.2 n.5; Supplemental Public Report, *Hexamine (Hexamethylenetetramine) from Germany, India, and Saudi Arabia*, Inv. Nos. 701-TA-738 and 731-TA-1713–1715 (Final), USITC Pub. 5693 (Dec. 2025) (“Supplemental PR”) at 1.2 n.5.

⁹ 19 U.S.C. § 1677(24)(A)(i).

¹⁰ 19 U.S.C. § 1677(24)(A)(ii).

¹¹ 19 U.S.C. § 1677(24)(B). India, the only source of imports subject to a countervailing duty investigation in these trailing proceedings, is not on USTR’s list of developing countries for purposes of applicability of the 4 percent and 9 percent negligibility limits. *See Designations of Developing Countries and Least Developed Countries Under the Countervailing Duty Law*, 85 Fed. Reg. 7613 (USTR Feb. 10, 2020).

¹² Supplemental CR/PR at Table 1.6.

three percent negligibility threshold for all investigations, we find that imports from each subject country are not negligible.

III. Material Injury by Reason of Cumulated Subject Imports

Section 771(7)(G)(iii) of the Tariff Act of 1930, as amended (“the Act”), provides that the Commission must make its material injury determinations in the instant trailing investigations on the basis of the same record as that in the leading investigation, with the additions discussed above.¹³ Therefore, in these investigations, we adopt the findings and analyses from our determination and views in the leading investigations with respect to the issues of domestic like product, domestic industry, cumulation, conditions of competition, and material injury by reason of cumulated subject imports.^{14 15}

¹³ 19 U.S.C. § 1677(7)(G)(iii).

¹⁴ The statute additionally instructs the Commission to consider the “magnitude of the dumping margin” in an antidumping duty proceeding as part of its consideration of the impact of subject imports. 19 U.S.C. § 1677(7)(C)(iii)(V). In its final antidumping duty determination regarding Germany, Commerce calculated dumping margins of 52.29 percent for Prefere Paraform GmbH & Co Kg, 102.14 percent for Fiberpipe GFK Vertriebsgesellschaft, and 59.29 percent for all other producers and exporters not individually examined (“all others”). Supplemental CR/PR at Table 1.3; *Hexamethylenetetramine From Germany: Final Affirmative Determination of Sales at Less-Than-Fair-Value and Final Affirmative Determination of Critical Circumstances*, 90 Fed. Reg. 45,728 (Sept. 23, 2025). In its final antidumping duty determination regarding India, Commerce calculated dumping margins of 5.11 percent for Kanoria Chemicals and Industries Limited (“Kanoria”), 105.76 percent for four entities (Horizon Chemicals; Micro Labs Limited; Shreenathji Rasayan Private Limited; and Rajsha Chemicals Pvt. Ltd), and 5.11 percent for all others. Supplemental CR/PR at Table 1.4; *Hexamethylenetetramine from India: Final Affirmative Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 90 Fed. Reg. 45,725 (Sept. 23, 2025). In its final antidumping duty determination regarding Saudi Arabia, Commerce calculated dumping margins of 6.13 percent for Methanol Chemicals Company and all others. Supplemental CR/PR at Table 1.5; *Hexamethylenetetramine From the Kingdom of Saudi Arabia: Final Affirmative Determination of Sales at Less Than Fair Value and Final Negative Determination of Critical Circumstances*, 90 Fed. Reg. 45,723 (Sept. 23, 2025).

We take into account in our analysis the fact that Commerce has made final findings that subject imports from Germany, India, and Saudi Arabia are sold in the United States at LTFV, as well as the magnitude of the margins of dumping found by Commerce. In addition to this consideration, other factors that support our analysis from the leading determination remain unchanged and do not require modification; for example, our analysis of the significant price effects of cumulated subject imports found in the leading determination is probative to our assessment of the impact of such imports, including subject imports from Germany, India, and Saudi Arabia. *See generally* Confidential Views of the Commission in Hexamine from China, EDIS Doc. No. 861189 (Sept. 3, 2025) at 6-49; *Hexamine (Hexamethylenetetramine) from China, Germany, India, and Saudi Arabia*, USITC Pub. 5660 (Sept. 2025) at 5-37.

¹⁵ Commissioner Johanson adopts the findings and analyses of the Commission as set out his separate views in the leading investigation, including his views regarding cumulation. *See generally* (Continued...)

IV. Critical Circumstances

A. Legal Standards

Commerce reached final affirmative critical circumstances findings with respect to subject imports shipped by all producers/exporters from Germany and subject imports from India shipped by all other producers/exporters not individually examined in the antidumping and countervailing duty investigations.¹⁶ Commerce reached final negative critical circumstances findings with respect to subject imports shipped by Indian producer/exporter Kanoria and all producers/exporters from Saudi Arabia.¹⁷

Because we have determined that the domestic industry is materially injured by reason of subject imports from Germany and India, we must further determine "whether the imports subject to the affirmative {Commerce critical circumstances} determination ... are likely to undermine seriously the remedial effect of the antidumping {and/or countervailing duty} order{s} to be issued."¹⁸

The Statement of Administrative Action to the Uruguay Round Agreements Act ("SAA") indicates that the Commission is to determine "whether, by massively increasing imports prior to the effective date of relief, the importers have seriously undermined the remedial effect of the order" and specifically "whether the surge in imports prior to the suspension of liquidation, rather than the failure to provide retroactive relief, is likely to seriously undermine the remedial effect of the order."¹⁹ The legislative history for the critical circumstances provision indicates that the provision was designed "to deter exporters whose merchandise is subject to an investigation from circumventing the intent of the law by increasing their exports to the United States during the period between initiation of an investigation and a preliminary determination by {Commerce}."²⁰ An affirmative critical circumstances determination by the Commission, in conjunction with an affirmative determination of material injury by reason of subject imports,

Separate Views of Commissioner David S. Johanson in Hexamine from China, EDIS Doc. No. 861190 (Sept. 4, 2025); *Hexamine (Hexamethylenetetramine) from China, Germany, India, and Saudi Arabia*, USITC Pub. 5660 (Sept. 2025). For the reasons explained in those separate views he finds that an industry in the United States is threatened with material injury by reason of imports of hexamine from Germany, India, and Saudi Arabia.

¹⁶ Supplemental CR/PR at 1.6.

¹⁷ Supplemental CR/PR at 1.6.

¹⁸ 19 U.S.C. §§ 1671d(b)(4)(A)(i), 1673d(b)(4)(A)(i).

¹⁹ H.R. Rep. No. 103-316, Vol. I at 877 (1994).

²⁰ *ICC Industries, Inc. v United States*, 812 F.2d 694, 700 (Fed. Cir. 1987), quoting H.R. Rep. No. 96-317 at 63 (1979), *aff'g* 632 F. Supp. 36 (Ct. Int'l Trade 1986). See 19 U.S.C. §§ 1671b(e)(2), 1673b(e)(2).

would normally result in the retroactive imposition of duties for those imports subject to the affirmative Commerce critical circumstances determination for a period 90 days prior to the suspension of liquidation.²¹

The statute provides that, in making this determination, the Commission shall consider, among other factors it considers relevant,

- (I) the timing and the volume of the imports,
- (II) a rapid increase in inventories of the imports, and
- (III) any other circumstances indicating that the remedial effect of the {order} will be seriously undermined.²²

In considering the timing and volume of subject imports, the Commission's practice is to consider import quantities prior to the filing of the petition with those subsequent to the filing of the petition using monthly statistics on the record regarding those firms for which Commerce has made an affirmative critical circumstances determination.²³

B. Analysis

As an initial matter, we note that in these investigations, Petitioner, Bakelite LLC, filed critical circumstance allegations with Commerce after the record closed in the Commission's leading investigations.²⁴ Accordingly, the Commission did not collect certain information relevant to critical circumstances that it typically collects but nonetheless has used the best information available to analyze Bakelite's assertion of critical circumstances.

We first consider the appropriate period for comparisons in our critical circumstances analysis of pre-petition and post-petition levels of subject imports from Germany and India. The petitions in these investigations were filed on September 30, 2024.²⁵ Because the petition was filed at the end of the month, September 2024 constitutes the last month of the pre-petition period. Commerce's preliminary determinations in the countervailing duty investigation with respect to India was issued on March 7, 2025 and its preliminary determinations in the antidumping duty investigations with respect to Germany and India were issued on May 6, 2025.²⁶ The Commission frequently relies on comparisons of the six-month

²¹ 19 U.S.C. §§ 1671b(e)(2), 1673b(e)(2).

²² 19 U.S.C. §§ 1671d(b)(4)(A)(ii), 1673d(b)(4)(A)(ii).

²³ See *Lined Paper School Supplies from China, India, and Indonesia*, Inv. Nos. 701-TA-442-43, 731-TA-1095-97, USITC Pub. 3884 at 46-48 (Sept. 2006); *Carbazole Violet Pigment from China and India*, Inv. Nos. 701-TA-437 and 731-TA-1060-61 (Final), USITC Pub. 3744 at 26 (Dec. 2004); *Certain Frozen Fish Fillets from Vietnam*, Inv. No. 731-TA-1012 (Final), USITC Pub. 3617 at 20-22 (Aug. 2003).

²⁴ Supplemental CR/PR at 1.6 n.16, 1.8 n.17.

²⁵ Supplemental CR/PR at Table 1.1.

²⁶ Supplemental CR/PR at Table 1.1.

periods preceding and following filing of the petition, but has relied on shorter periods when Commerce’s preliminary determination applicable to the country at issue fell within the six-month post-petition period the Commission typically considers.²⁷ Therefore, we will, with respect to the India countervailing duty investigation, compare the volume of subject imports in the five months prior to the filing of the petition (May – September 2024) with the volume of subject imports in the five month period after the filing of the petition (October 2024 – February 2025) and, with respect to the India and Germany antidumping duty investigations, compare the volume of subject imports in the six months prior to the filing of the petition (April – September 2024) with the volume of subject imports in the six months after the filing of the petition (October 2024 – March 2025).²⁸

1. India AD and CVD Investigations

At the outset, we note that no party to these investigations presented any arguments to the Commission regarding critical circumstances with respect to subject imports from India.

All the reported subject imports from India during the pre-and post-petition periods were sourced from ***, who is not subject to Commerce’s affirmative critical circumstances determinations.²⁹ Accordingly, there were no reported imports of hexamine from India during

²⁷ See *Certain Hot-Rolled Steel Flat Products from Australia, Brazil, Japan, Korea, the Netherlands, Turkey, and the United Kingdom*, Inv. Nos. 701-TA-545-547, 731-TA-1291-1297 (Final), USITC Pub. 4638 at 49-50 (Sept. 2016); *Certain Corrosion-Resistance Steel Products from China, India, Italy, Korea, and Taiwan*, Inv. No. 701-TA-534-537 and 731-TA-1274-1278 (Final), USITC Pub. 4630 at 35-40 (July 2016); *Carbon and Certain Steel Wire Rod from China*, Inv. Nos. 701-TA-512, 731-TA-1248 (Final), USITC Pub. 4509 at 25-26 (Jan. 2015) (using five-month periods because preliminary Commerce countervailing duty determination was during the sixth month after the petition).

We note that the Commission is not required to examine the same periods that Commerce examined in performing the critical circumstances analysis. See *Certain Polyester Staple Fiber from China*, Inv. No. 731-TA-1104 (Final), USITC Pub. 3922 at 35 (June 2007); *Steel Concrete Reinforcing Bars from Turkey*, Inv. No. 731-TA-745 (Final), USITC Pub. 3034 at 34 (Apr. 1997).

Commerce’s preliminary determination in the countervailing duty investigation of imports of hexamine from India – issued March 7, 2025 – occurred during the final month of the six-month post-petition comparison period. We note that our ultimate finding would have been the same even if we examined a six-month comparison period, as a comparison of those periods indicates that imports from India subject to Commerce’s affirmative critical circumstances finding ***. Supplemental CR/PR at 1.6. Commerce determined that critical circumstances do not exist with respect to imports of hexamine shipped by ***. *Id.*

²⁸ Supplemental CR/PR at Tables 1.7.

²⁹ Supplemental CR/PR at 1.8. U.S. importers *** were the only firms that reported U.S. imports of hexamine from India during the pre-and post-petition periods. *Id.* With respect to inventories, because Bakelite’s allegations of critical circumstances were raised after the record in these investigations closed, the record does not contain data on inventories for the pre- or post-petition; (Continued...)

the pre-or post-petition periods subject to Commerce’s affirmative critical circumstances determinations for the India antidumping and countervailing duty investigations.

We therefore make negative findings with respect to subject imports from India subject to Commerce’s affirmative determination of critical circumstances in the antidumping duty and countervailing duty investigations.

2. Germany AD Investigation

At the outset, we note that no party to these investigations presented any arguments to the Commission regarding critical circumstances with respect to subject imports from Germany.

Subject imports from Germany subject to Commerce’s affirmative critical circumstances determination increased from *** pounds in the pre-petition period to *** pounds in the post-petition period, an increase of *** percent.³⁰ However, there is no indication that the volume increase was a response to a potential order, as the monthly volumes of subject imports from Germany during the post-petition period fluctuated and the peak levels were below or consistent with other months of the period of investigation, including February 2022, March 2022, August 2022, May 2023, December 2023, and July 2024.³¹ Indeed, the volume of imports from Germany at *** pounds in the corresponding period twelve-months earlier than the post-petition period (*i.e.*, October 2023-March 2024), was greater than the volume recorded over the post-petition period of October 2024 – March 2025, at *** pounds.³²

The record does not contain pre- and post-petition period comparisons of inventories of subject imports for Germany subject to Commerce’s affirmative critical circumstances determination because Petitioner, Bakelite LLC, filed its critical circumstance allegations with

however, the record does contain end of period inventories of U.S. imports for December 2024 and March 2025. That data show that inventories of subject imports reported by U.S. importers in December 2024 and March 2025 were all held by U.S. importer ***. *Id.* at 1.8 n.17.

³⁰ Supplemental CR/PR at Table 1.7.

³¹ Confidential Report, INV-XX-105 (Aug. 6, 2025) (“CR”) at Figure 4.3. We also note that the volume of the increase, of *** pounds, was relatively small in relation to the U.S. market, equivalent to only *** percent of apparent U.S. consumption in 2024. *Compare* Supplemental CR/PR at Table 1.7 with Table C.1.

³² *Derived from* CR/PR at Table 4.7. We further note that the volume data do not clearly indicate a “rush” to enter product prior to the period that would be covered by the retroactive application of duties resulting from an affirmative critical circumstances determination (*i.e.*, 90 days prior to May 6, 2025): the volume in the first half of the post-petition period (*i.e.*, October – December 2024, which would fall outside the retroactive period for application of duties) at *** pounds, was lower than the volume recorded during the second half of the post-petition period (January – March 2025), at *** pounds.

Commerce after the Commission’s record closed on August 11, 2025.³³ The record information concerning inventories is limited to U.S. importers’ end-of-period inventories for 2024 and interim period 2025, which do not correspond to the pre- and post-petition periods and is therefore of limited probative value.³⁴

Finally, with respect to pricing in the post-petition period, subject imports from Germany generally undersold the domestic like product in the two pricing products for which comparisons were available in the last two quarters of the period of investigation.³⁵ However, we observe that the trends for subject imports from Germany were mixed, with the underselling margin increasing for pricing product 1 and decreasing for pricing product 2.³⁶ Moreover, the average unit values (“AUVs”) of U.S. shipments of subject imports from Germany were higher in the interim 2025 period than in both the interim 2024 period and for the full year 2024.³⁷

In light of these considerations, and in the absence of party arguments, we do not find that subject imports from Germany in the post-petition period are of such a magnitude as to seriously undermine the remedial effect of the order. Consequently, we make a negative finding with respect to subject imports from Germany subject to Commerce’s affirmative determination of critical circumstances in the antidumping duty investigation.

³³ Supplemental CR/PR at 1.6 n.16, 1.8 n.17. The Commission makes its final determinations based on the record compiled in the leading investigations and the record may only be supplemented in these trailing investigations with Commerce’s subsequently completed final determinations and any party comments on Commerce’s final determinations. 19 U.S.C. § 1677(7)(G)(iii).

³⁴ Supplemental CR/PR at Table 1.6 n.16 and Table C.1. The available record information indicates that end-of-period U.S. inventories of subject imports from Germany were *** pounds in December 2024 and *** pounds in March 2025. Supplemental CR/PR at Table 1.6, n.16. Although of limited probative value, we note that the record indicates that inventories of subject imports from Germany increased by *** percent from the end of 2024 to the second half of the post-petition period (January-March 2025, which corresponds to the interim 2025 period in these investigations) but the inventories held at the end of March 2025 only amounted to *** percent of subject imports from Germany in 2024. Compare Supplemental CR/PR at 1.6 n.16 with Confidential Report, INV-XX-105 (Aug. 6, 2025) (“CR”) at Table 4.2. Moreover, end-of-period inventories from Germany as of March 2025 (*** pounds) were *** percent lower than at the end of March 2024 (*** pounds), indicating that there was no meaningful stockpiling of subject imports from Germany after the filing of the petitions. Supplemental CR/PR at Table 1.6 n.16.

³⁵ CR at Tables 5.4-5.5, Figures 5.2-5.3.

³⁶ CR at Table 5.7.

³⁷ Supplemental CR/PR at Table C.1.

V. Conclusion

For the reasons stated above, we determine that an industry in the United States is materially injured by reason of subject imports of hexamine from Germany, India, and Saudi Arabia found by Commerce to be sold in the United States at LTFV and imports of hexamine from India found by Commerce to be subsidized by the government of India.

We also find that critical circumstances do not exist with respect to imports of hexamine from India that are subject to Commerce's final affirmative critical circumstances determinations in its countervailing duty investigation and with respect to imports of hexamine from Germany and India that are subject to Commerce's final affirmative critical circumstances determinations in its antidumping duty investigations.

Part 1: Introduction

Background

These investigations result from petitions filed with the U.S. Department of Commerce (“Commerce”) and the U.S. International Trade Commission (“USITC” or “Commission”) by Bakelite Synthetics (Atlanta, Georgia) on September 30, 2024, alleging that an industry in the United States is materially injured and threatened with material injury by reason of subsidized imports of hexamine (hexamethylenetetramine)¹ from China and India and less-than-fair-value (“LTFV”) imports from China, Germany, India, and Saudi Arabia. Table 1.1 presents information relating to the background of these investigations.^{2 3}

Table 1.1 Hexamine: Information relating to the background and schedule of this proceeding

Effective date	Action
September 30, 2024	Petitions filed with Commerce and the Commission; institution of the Commission investigations (89 FR 80929, October 4, 2024)
October 21, 2024	Commerce’s notices of initiation (89 FR 87545 and 87560, November 4, 2024)
November 14, 2024	Commission’s preliminary determinations (89 FR 91786, November 20, 2024)
March 7, 2025	Commerce’s preliminary CVD determinations with respect to China and India, and alignment of final CVD determinations with final AD determinations (90 FR 11508 and 11512)
May 6, 2025	Commerce’s preliminary AD determinations with respect to China, Germany, India, and Saudi Arabia; postponement of final determinations with respect to Germany, India, and Saudi Arabia (90 FR 19182, 19186, 19178, and 19180); scheduling of final phase of Commission investigations (90 FR 21948, May 22, 2025)
July 18, 2025	Commerce’s final China AD and CVD determinations (90 FR 33922 and 33923)
July 18, 2025	Commission’s hearing
August 15, 2025	Commission’s China AD and CVD votes
September 3, 2025	Commission’s China AD and CVD views
September 23, 2025	Commerce’s final CVD determination with respect to India (90 FR 45720) and final AD determinations with respect to Germany, India, and Saudi Arabia (90 FR 45728, 45725, and 45723)

¹ See the section entitled “The subject merchandise” in Part 1 of this report for a complete description of the merchandise subject in this proceeding.

² Pertinent Federal Register notices are referenced in appendix A and may be found at the Commission’s website (www.usitc.gov).

³ Appendix B presents witnesses who appeared at the Commission’s hearing.

Effective date	Action
September 23, 2025	Scheduling of final phase of Commission's trailing India CVD and Germany, India, and Saudi Arabia AD investigations (90 FR 47327, October 1, 2025)
November 17, 2025	Revised scheduling of final phase of Commission's trailing India CVD and Germany, India, and Saudi Arabia AD investigations due to lapse in appropriations and ensuing cessation of Commission operations (90 FR 52436, November 20, 2025)
December 10, 2025	Commission's vote (India CVD and Germany, India, and Saudi Arabia AD investigations)
December 22, 2025	Commission's views (India CVD and Germany, India, and Saudi Arabia AD investigations)

Note: Due to the lapse in appropriations and ensuing cessation of Commission operations, the Commission revised its schedule for this proceeding.

The information contained in this report is intended to be used in conjunction with data presented in the Commission's report on *Hexamine (Hexamethylenetetramine) from China*, Investigation Nos. 701-TA-737 and 731-TA-1712 (Final), USITC Publication 5660, September 2025, and its corresponding confidential report contained in memorandum No. INV-XX-105, *Hexamine (Hexamethylenetetramine) from China, Germany, India, and Saudi Arabia*, Investigation Nos. 701-TA-737-738 and 731-TA-1712-1715 (Final).⁴ No new information is included in the record for these proceedings except for Commerce's final determinations of subsidization of hexamine in India and Commerce's final LTFV determinations concerning hexamine from Germany, India, and Saudi Arabia.⁵

⁴ Appendix C of this report reproduces summary data referenced in the Commission's views.

⁵ Parties were given a deadline of 5:15 p.m. on November 19, 2025, for filing supplemental comments on Commerce's final countervailing duty and antidumping duty determinations; however, no additional comments from parties were received.

Nature and extent of subsidies and sales at LTFV

Subsidies

On September 23, 2025, Commerce published a notice in the Federal Register of its final determinations of countervailable subsidies for producers and exporters of hexamine from India.⁶ Table 1.2 presents Commerce’s findings of subsidization of hexamine in India.

Table 1.2 Hexamine: Commerce’s final subsidy determinations with respect to imports from India

Entity	Final countervailable subsidy rate (percent)
Kanoria Chemicals and Industries Limited	2.34
Horizon Chemicals	139.57
Micro Labs Ltd	139.57
Shreenathji Rasayan Private Limited	139.57
Rajsha Chemicals Pvt. Ltd	139.57
All Others	2.34

Source: 90 FR 45720, September 23, 2025.

Note: Commerce continues to find that Vardhan Limited is cross-owned with Kanoria Chemicals and Industries Limited. Rates for Horizon Chemicals, Micro Labs Ltd., Shreenathji Rasayan Private Limited, and Rajsha Chemicals Pvt. Ltd are based on facts available with adverse inferences. For further information on programs determined to be countervailable, see Commerce’s associated Issues and Decision Memorandum.

Sales at LTFV

On September 23, 2025, Commerce published a notice in the Federal Register of its final determinations of sales at LTFV with respect to imports from Germany,⁷ India,⁸ and Saudi Arabia.⁹ Tables 1.3 through 1.5 present Commerce’s dumping margins with respect to imports of hexamine from Germany, India, and Saudi Arabia.

⁶ 90 FR 45720, September 23, 2025.

⁷ 90 FR 45728, September 23, 2025.

⁸ 90 FR 45725, September 23, 2025.

⁹ 90 FR 45723, September 23, 2025.

Table 1.3 Hexamine: Commerce’s final weighted-average LTFV margins with respect to imports from Germany

Exporter/producer	Final estimated weighted-average dumping margin (percent)
Prefere Paraform GmbH & Co Kg	52.29
Fiberpipe GFK Vertriebsgesellschaft	102.14
All Others	59.29

Source: 90 FR 45728, September 23, 2025.

Note: The rate for Fiberpipe GFK Vertriebsgesellschaft is based on facts available with adverse inferences.

Table 1.4 Hexamine: Commerce’s final weighted-average LTFV margins with respect to imports from India

Exporter/producer	Final weighted-average dumping margin (percent)	Final cash deposit rate (adjusted for subsidy offset(s)) (percent)
Kanoria Chemicals and Industries Limited	5.11	3.12
Horizon Chemicals	105.76	103.77
Micro Labs Limited	105.76	103.77
Shreenathji Rasayan Private Limited	105.76	103.77
Rajsha Chemicals Pvt. Ltd	105.76	103.77
All Others	5.11	3.12

Source: 90 FR 45725, September 23, 2025.

Note: Weighted-average dumping margins for Horizon Chemicals, Micro Labs Limited, Shreenathji Rasayan Private Limited, and Rajsha Chemicals Pvt. Ltd. are based on facts available with adverse inferences. The cash deposit rates for Kanoria and all others are adjusted for export subsidies of 1.99 percent (comprised of 1.19 percent for the duty drawback program, and 0.80 percent for the remissions of duties and taxes on export products program).

Table 1.5 Hexamine: Commerce’s final weighted-average LTFV margins with respect to imports from Saudi Arabia

Exporter/producer	Final weighted-average dumping margin (percent)
Methanol Chemicals Company	6.13
All Others	6.13

Source: 90 FR 45723, September 23, 2025.

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.¹⁰ Negligible imports are generally defined in the Act, as amended, as imports from a country of merchandise corresponding to a domestic like product where such imports account for less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which data are available that precedes the filing of the petition or the initiation of the investigation. However, if there are imports of such merchandise from a number of countries subject to investigations initiated on the same day that individually account for less than 3 percent of the total volume of the subject merchandise, and if the imports from those countries collectively account for more than 7 percent of the volume of all such merchandise imported into the United States during the applicable 12-month period, then imports from such countries are deemed not to be negligible.¹¹

As shown in table 1.6, U.S. imports from Germany accounted for *** percent, U.S. imports from India accounted for *** percent, and U.S. imports from Saudi Arabia accounted for *** percent of total U.S. imports of hexamine, by quantity, from September 2023 through August 2024. U.S. imports from subject sources accounted for *** percent of total U.S. imports of hexamine by quantity during the negligibility period.

Table 1.6 Hexamine: U.S. imports in the twelve-month period preceding the filing of the petitions, September 2023 through August 2024

Quantity in 1,000 pounds; share in percent

Source of imports	Quantity	Share of quantity
China	***	***
Germany	***	***
India	***	***
Saudi Arabia	***	***
Russia	***	***
All other sources	***	***
All sources	***	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

¹⁰ Sections 703(a)(1), 705(b)(1), 733(a)(1), and 735(b)(1) of the Act (19 U.S.C. §§ 1671b(a)(1), 1671d(b)(1), 1673b(a)(1), and 1673d(b)(1)).

¹¹ Section 771 (24) of the Act (19 U.S.C § 1677(24)).

Critical circumstances

On September 23, 2025, Commerce found in the context of the Germany AD investigation that critical circumstances exist for Prefere, Fiberpipe GFK Vertriebsgesellschaft (Fiberpipe), and all other producers and exporters.¹² Additionally, Commerce issued its final determinations in the context of both the AD and CVD investigations with respect to India that critical circumstances do not exist for Kanoria and all other producers and exporters not individually examined but that critical circumstances do exist for non-responsive producers and exporters (i.e., Horizon Chemicals, Micro Labs Ltd., Shreenathji Rasayan Private Limited, and Rajsha Chemicals Pvt. Ltd.).¹³ Lastly, on September 23, 2025, Commerce issued its final determination in the context of the AD investigation with respect to Saudi Arabia that critical circumstances do not exist for Methanol Chemicals Company (Chemanol), and all other companies not individually examined with respect to allegations of critical circumstances made.^{14 15}

In these investigations, if both Commerce and the Commission make affirmative final critical circumstances determinations, certain subject imports may be subject to antidumping duties retroactive by 90 days from March 7, 2025, the effective date of Commerce's preliminary affirmative subsidy determinations with respect to India and retroactive by 90 days from May 6, 2025, the effective date of Commerce's preliminary affirmative LTFV determinations with respect to Germany and India. Table 1.7 and figure 1.1 present U.S. import data for hexamine from Germany during the six month period covering before and after the filing of the petition for the Commission's critical circumstances analysis with respect to Germany.¹⁶

¹² 90 FR 45728, September 23, 2025, referenced in app. A.

¹³ 90 FR 45725 and 45720, September 23, 2025, referenced in app. A.

¹⁴ 90 FR 45723, September 23, 2025, referenced in app. A.

¹⁵ When petitioners file timely allegations of critical circumstances, Commerce examines whether there is a reasonable basis to believe or suspect that (1) either there is a history of dumping or subsidization and material injury by reason of dumped or subsidized imports in the United States or elsewhere of the subject merchandise, or the person by whom, or for whose account, the merchandise was imported knew or should have known that the exporter was selling the subject merchandise at LTFV or that the exporter was benefitting from countervailable subsidies and that there was likely to be material injury by reason of such sales; and (2) there have been massive imports of the subject merchandise over a relatively short period.

¹⁶ Monthly inventories of U.S. imports are not presented as the petitioner made allegations of critical circumstances after the closing of the record in the Commission's proceeding, and inventory data by month was not collected in the Commission's questionnaires. Based on questionnaire responses, inventories of U.S. imports from Germany were *** pounds at the end of the 2024 period (December 2024) and were *** pounds at the end of the interim 2025 period (March 2025).

Table 1.7 Hexamine: U.S. imports from Germany subject to final Commerce critical circumstances determination in the AD investigation, by month

Quantity in 1,000 pounds

Month	Relation to petition	Quantity
April 2024	Before	***
May 2024	Before	***
June 2024	Before	***
July 2024	Before	***
August 2024	Before	***
September 2024	Before	***
October 2024	After	***
November 2024	After	***
December 2024	After	***
January 2025	After	***
February 2025	After	***
March 2025	After	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table 1.7 Continued Hexamine: U.S. imports from Germany subject to final Commerce critical circumstances determination in the AD investigation, by month

Quantity in 1,000 pounds

Comparison pre-post petition period	Cumulative before period quantity	Cumulative after period quantity	Difference in percent
1 month	***	***	***
2 months	***	***	***
3 months	***	***	***
4 months	***	***	***
5 months	***	***	***
6 months	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “—”.

Figure 1.1 Hexamine: U.S. imports from Germany subject to final Commerce critical circumstances determination in the AD investigation, by month

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

***¹⁷

Data for Saudi Arabia is not presented as Commerce reached a final negative determination of critical circumstances with respect to Saudi Arabia.

¹⁷ As previously noted, monthly inventories of U.S. imports are not presented as the petitioner made allegations of critical circumstances after the closing of the record in the Commission's proceeding, and inventory data by month was not collected in the Commission's questionnaires. Based on questionnaire responses, ***.

APPENDIX A
FEDERAL REGISTER NOTICES

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
89 FR 80929, October 4, 2024	<i>Hexamine (Hexamethylenetetramine) From China, Germany, India, and Saudi Arabia; Notice of Institution of Antidumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2024-10-04/pdf/2024-22956.pdf
89 FR 87545, November 4, 2024	<i>Hexamethylenetetramine From the People's Republic of China, Germany, India, and Saudi Arabia: Initiation of Less-Than-Fair-Value Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2024-11-04/pdf/2024-25525.pdf
89 FR 87560, November 4, 2024	<i>Hexamethylenetetramine From the People's Republic of China and India: Initiation of Countervailing Duty Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2024-11-04/pdf/2024-25524.pdf
89 FR 91786, November 20, 2024	<i>Hexamine (Hexamethylenetetramine) From China, Germany, India, and Saudi Arabia; Determinations</i>	https://www.govinfo.gov/content/pkg/FR-2024-11-20/pdf/2024-26998.pdf
90 FR 11508, March 7, 2025	<i>Hexamethylenetetramine From the People's Republic of China: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination</i>	https://www.govinfo.gov/content/pkg/FR-2025-03-07/pdf/2025-03639.pdf
90 FR 11512, March 7, 2025	<i>Hexamethylenetetramine From India: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination</i>	https://www.govinfo.gov/content/pkg/FR-2025-03-07/pdf/2025-03644.pdf
90 FR 19182, May 6, 2025	<i>Hexamethylenetetramine From the People's Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2025-05-06/pdf/2025-07802.pdf
90 FR 19186, May 6, 2025	<i>Hexamethylenetetramine From Germany: Preliminary Affirmative Determination of Sales at Less-Than-Fair-Value, Postponement of Final Determination, and Extension of Provisional Measures</i>	https://www.govinfo.gov/content/pkg/FR-2025-05-06/pdf/2025-07803.pdf
90 FR 19178, May 6, 2025	<i>Hexamethylenetetramine From India: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination and Extension of Provisional Measures</i>	https://www.govinfo.gov/content/pkg/FR-2025-05-06/pdf/2025-07804.pdf

Citation	Title	Link
90 FR 19180, May 6, 2025	<i>Hexamethylenetetramine From the Kingdom of Saudi Arabia: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures</i>	https://www.govinfo.gov/cont ent/pkg/FR-2025-05-06/pdf/2025-07805.pdf
90 FR 21948, May 22, 2025	<i>Hexamine From China, Germany, India, and Saudi Arabia; Scheduling of the Final Phase of Countervailing Duty and Antidumping Duty Investigations</i>	https://www.govinfo.gov/cont ent/pkg/FR-2025-05-22/pdf/2025-09157.pdf
90 FR 33922, July 18, 2025	<i>Hexamethylenetetramine From the People's Republic of China: Final Affirmative Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/cont ent/pkg/FR-2025-07-18/pdf/2025-13563.pdf
90 FR 33923, July 18, 2025	<i>Hexamethylenetetramine From the People's Republic of China: Final Affirmative Countervailing Duty Determination</i>	https://www.govinfo.gov/cont ent/pkg/FR-2025-07-18/pdf/2025-13564.pdf
90 FR 45720, September 23, 2025	<i>Hexamethylenetetramine from India: Final Affirmative Countervailing Duty Determination and Final Affirmative Critical Circumstances Determination, In Part</i>	https://www.govinfo.gov/cont ent/pkg/FR-2025-09-23/pdf/2025-18442.pdf
90 FR 45725, September 23, 2025	<i>Hexamethylenetetramine from India: Final Affirmative Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part</i>	https://www.govinfo.gov/cont ent/pkg/FR-2025-09-23/pdf/2025-18441.pdf
90 FR 45728, September 23, 2025	<i>Hexamethylenetetramine from Germany: Final Affirmative Determination of Sales at Less-Than-Fair-Value and Final Affirmative Determination of Critical Circumstances</i>	https://www.govinfo.gov/cont ent/pkg/FR-2025-09-23/pdf/2025-18440.pdf
90 FR 45723, September 23, 2025	<i>Hexamethylenetetramine from the Kingdom of Saudi Arabia: Final Affirmative Determination of Sales at Less Than Fair Value and Final Negative Determination of Critical Circumstances</i>	https://www.govinfo.gov/cont ent/pkg/FR-2025-09-23/pdf/2025-18443.pdf
90 FR 52436, November 20, 2025	<i>Hexamine from Germany, India, and Saudi Arabia; Revised Schedule for the Subject Proceeding</i>	https://www.govinfo.gov/cont ent/pkg/FR-2025-11-20/pdf/2025-20341.pdf

APPENDIX B

LIST OF HEARING WITNESSES

CALENDAR OF PUBLIC HEARING

Those listed below appeared in the United States International Trade Commission's hearing:

Subject: Hexamine (Hexamethylenetetramine) from China, Germany, India, and Saudi Arabia

Inv. Nos.: 701-TA-737-738 and 731-TA-1712-1715 (Final)

Date and Time: July 18, 2025 - 9:30 a.m.

Sessions were held in connection with these investigations in the Main Hearing Room (Room 101), 500 E Street, SW., Washington, DC.

OPENING REMARKS:

In Support of Imposition (**Matthew L. Kanna**, Greenberg Traurig, LLP)
In Opposition to Imposition (**Matthew W. Solomon**, White & Case LLP)

In Support of the Imposition of the Antidumping and Countervailing Duty Orders:

Greenberg Traurig, LLP
Washington, DC
on behalf of

Bakelite LLC ("Bakelite")

Jesse L. Neese, Director, Strategy and Regulatory Affairs, Bakelite

Jaret Brochmann, Vice President, Sales and Technical Services, Bakelite

Laura Boninsegni, Vice President, FP&A and Regional Finance Leader,
Bakelite

Brad Roderick, Director, Bakelite

Ronald Bazinet, Plant Manager, Bakelite

Stephanie Velez, Assistant Director, Greenberg Traurig, LLP

**In Support of the Imposition of the
Antidumping and Countervailing Duty Orders (continued):**

Ana Leme, Paralegal, Greenberg Traurig, LLP

Jennifer Lutz, Partner, Ion Economics, LLC

Cara Groden, Senior Economic Consultant, Ion Economics, LLC

Matthew L. Kanna)
) – OF COUNSEL
Claudia D. Hartleben)

**In Opposition to the Imposition of the
Antidumping and Countervailing Duty Orders:**

White & Case LLP
Washington, DC
on behalf of

General Authority for Foreign Trade (“GAFT”)

Jay C. Campbell)
) – OF COUNSEL
Matthew W. Solomon)

REBUTTAL/CLOSING REMARKS:

In Support of Imposition (**Claudia D. Hartleben**, Greenberg Traurig, LLP)
In Opposition to Imposition (**Jay C. Campbell**, White & Case LLP)

APPENDIX C
SUMMARY DATA

Total market

Table C.1

Hexamine: Summary data concerning the U.S. total market, by item and period

Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound; Period changes=percent--exceptions noted; Interim period is January through

Item	Reported data					Period change comparisons				
	Calendar year			Interim		Calendar year			Interim	
	2022	2023	2024	2024	2025	2022-24	2022-23	2023-24	2024-25	
U.S. total market consumption quantity:										
Amount.....	***	***	***	***	***	▼***	▼***	▼***	▼***	
Producers' share (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***	
Importers' share (fn1):										
China.....	***	***	***	***	***	▲***	▲***	▼***	▼***	
Germany.....	***	***	***	***	***	▲***	▼***	▲***	▲***	
India.....	***	***	***	***	***	▲***	▼***	▲***	▲***	
Saudi Arabia.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
Subject sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
Russia.....	***	***	***	***	***	▼***	▼***	▼***	▼***	
All other sources.....	***	***	***	***	***	▲***	▼***	▲***	▲***	
Nonsubject sources.....	***	***	***	***	***	▼***	▼***	▼***	▼***	
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
U.S. total market consumption value:										
Amount.....	***	***	***	***	***	▼***	▼***	▼***	▼***	
Producers' share (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▼***	
Importers' share (fn1):										
China.....	***	***	***	***	***	▼***	▲***	▼***	▼***	
Germany.....	***	***	***	***	***	▲***	▼***	▲***	▲***	
India.....	***	***	***	***	***	▲***	▼***	▲***	▲***	
Saudi Arabia.....	***	***	***	***	***	▲***	▲***	▲***	▼***	
Subject sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
Russia.....	***	***	***	***	***	▼***	▲***	▼***	▼***	
All other sources.....	***	***	***	***	***	▲***	▼***	▲***	▲***	
Nonsubject sources.....	***	***	***	***	***	▼***	▲***	▼***	▼***	
All import sources.....	***	***	***	***	***	▲***	▲***	▼***	▲***	
U.S. importers' U.S. shipments of imports from:										
China:										
Quantity.....	***	***	***	***	***	▼***	▲***	▼***	▼***	
Value.....	***	***	***	***	***	▼***	▲***	▼***	▼***	
Unit value.....	***	***	***	***	***	▼***	▼***	▲***	▼***	
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***	
Germany:										
Quantity.....	***	***	***	***	***	▼***	▼***	▲***	▼***	
Value.....	***	***	***	***	***	▼***	▼***	▲***	▲***	
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***	
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***	
India:										
Quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***	
Value.....	***	***	***	***	***	▲***	▼***	▲***	▲***	
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▲***	
Ending inventory quantity.....	***	***	***	***	***	▼***	***	▼***	▲***	
Saudi Arabia:										
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***	
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***	
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▼***	
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***	
Subject sources:										
Quantity.....			4,353	825	880	▲186.7	▲10.9	▲158.6	▲6.8	
Value.....	1,518	1,683	4,255	784	866	▲174.5	▲18.1	▲132.4	▲10.4	
Unit value.....	\$1.02	\$1.09	\$0.98	\$0.95	\$0.98	▼(4.2)	▲6.6	▼(10.1)	▲3.5	
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▼***	▲***	
Russia:										
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***	
Value.....	***	***	***	***	***	▼***	▼***	▼***	▼***	
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▲***	
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***	
All other sources:										
Quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***	
Value.....	***	***	***	***	***	▲***	▼***	▲***	▲***	
Unit value.....	***	***	***	***	***	▼***	▼***	▲***	▲***	
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	***	▼***	
Nonsubject sources:										
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***	
Value.....	***	***	***	***	***	▼***	▼***	▼***	▼***	
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***	
All import sources:										
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***	
Value.....	***	***	***	***	***	▼***	▲***	▼***	▼***	
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▲***	
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***	

Table continued.

Table C.1 Continued

Hexamine: Summary data concerning the U.S. total market, by item and period

Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per pound; Period changes=percent--exceptions noted; Interim period is January through

Item	Reported data					Period change comparisons				
	Calendar year			Interim		Calendar year			Interim	
	2022	2023	2024	2024	2025	2022-24	2022-23	2023-24	2024-25	
U.S. producers:										
Practical capacity quantity.....	***	***	***	***	***	***	***	***	***	
Production quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***	
Capacity utilization (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***	
U.S. shipments:										
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***	
Value.....	***	***	***	***	***	▼***	▼***	▼***	▼***	
Unit value.....	***	***	***	***	***	▼***	▼***	▲***	▲***	
Export shipments:										
Quantity.....	***	***	***	***	***	▼***	▼***	▲***	▼***	
Value.....	***	***	***	***	***	▼***	▼***	▲***	▲***	
Unit value.....	***	***	***	***	***	▼***	▼***	▲***	▲***	
Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***	
Inventories/total shipments (fn1).....	***	***	***	***	***	▲***	▼***	▲***	▲***	
Production workers.....	***	***	***	***	***	***	***	***	***	
Hours worked (1,000s).....	***	***	***	***	***	***	***	***	***	
Wages paid (\$1,000).....	***	***	***	***	***	▲***	***	▲***	▲***	
Hourly wages (dollars per hour).....	***	***	***	***	***	▲***	***	▲***	▲***	
Productivity (pounds per hour).....	***	***	***	***	***	▼***	▼***	▼***	▼***	
Unit labor costs.....	***	***	***	***	***	▲***	▲***	▲***	▲***	
Net sales:										
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***	
Value.....	***	***	***	***	***	▼***	▼***	▼***	▼***	
Unit value.....	***	***	***	***	***	▼***	▼***	▲***	▲***	
Cost of goods sold (COGS).....	***	***	***	***	***	▼***	▼***	▼***	▼***	
Gross profit or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▲***	
SG&A expenses.....	***	***	***	***	***	▲***	▼***	▲***	▲***	
Operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***	
Net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***	
Unit COGS.....	***	***	***	***	***	▼***	▼***	▲***	▲***	
Unit SG&A expenses.....	***	***	***	***	***	▲***	▼***	▲***	▲***	
Unit operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▲***	
Unit net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***	
COGS/sales (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***	
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***	
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***	
Capital expenditures.....	***	***	***	***	***	▲***	▼***	▲***	▲***	
Research and development expenses....	***	***	***	***	***	▲***	▼***	▲***	***	
Total assets.....	***	***	***	***	***	▼***	▼***	▼***	***	

Source: Compiled from data submitted in response to Commission questionnaires. 508-compliant tables for these data are contained in parts 3, 4, 6, and 7 of this report.

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.

Note.--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). Zeroes, 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.

