SUGARS AND SIRUPS FROM CANADA

Second Redetermination of
Material Injury in Investigation
No. 731-TA-3 (Final) Under
the Tariff Act of 1930

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UNITED STATES INTERNATIONAL TRADE COMMISSION

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C O N T E N T S

Note.--Information which would disclose confidential operations of individual concerns may not be published and therefore have been deleted from this report. Deletions are indicated by asterisks.

UNITED STATES INTERNATIONAL TRADE COMMISSION
Washington, D.C.

731-TA-3 (Final)

SUGARS AND SIRUPS FROM CANADA

Determination

Based on the record 1/ developed in investigation No. 731-TA-3 (Final), the Commission determines 2/ that as of March 6, 1980, the date of the Commission's initial determination regarding sugars and sirups from Canada, producers of all, or almost all of the production within the Northeastern regional market were materially injured by reason of the importation of sugars and sirups from Canada sold, or likely to be sold, at less than fair value (LTFV). The determination in this matter is made pursuant to the order of the U.S. Court of International Trade entered December 28, 1981, in the case of Atlantic Sugar, Ltd., et al. v. United States.

Background--First Remand

In March 1980 the Commission determined that an industry in the United States is being materially injured by reason of imports of sugars and sirups from Canada which the Department of the Treasury had determined are being, or are likely to be, sold in the United States at less than fair value. The Commission's determination was appealed to the United States Customs Court (now known as the U.S. Court of International Trade) on May 6, 1980.

1/ The "record" is defined in sec. 207.2(i) of the Commission's Rules of Practice and Procedures, 47 F.R. 6190, February 10, 1982.

2/ Commissioners Frank and Haggart did not participate.

Vice Chairman Calhoun affirms his earlier determination that an industry in the United States is materially injured by reason of the importation of sugars and sirups from Canada sold, or likely to be sold, at LTFV.

Commissioner Stern determines that as of March 6, 1980, Revere Sugar Corp. was materially injured by reason of the importation of sugars and sirups from Canada sold, or likely to be sold, at LTFV. Commissioner Stern also affirms her earlier determination that circumstances were not appropriate for consideration of the Northeastern geographic area as a separate and isolated region and that an industry in the United States was not materially injured or threatened with material injury by reason of the importation of sugars and sirups from Canada sold, or likely to be sold, at LTFV.

Subsequent to the Commission's determination and the appeal of that determination to the Court of International Trade, errors were discovered in the information considered by the Commission relating to (1) the regional demand supplied by domestic productive facilities located outside the Northeastern States region, and (2) the financial performance of one of the sugar producers located in the region in question.

In an order issued on July 8, 1981, the Court of International Trade directed that within 90 days the Commission--

> issue a new determination after considering the corrected data regarding the regional demand supplied from elsewhere and, if it is reached, the evidence regarding the profitability of the producers in the region 3/

On October 5, 1981, the Commission affirmed its prior determination (Commissioner Stern dissenting and Commissioners Bedell, Eckes, and Frank not participating) that as of March 6, 1980, an industry in the United States was materially injured by reason of the importation of sugars and sirups from Canada sold, or likely to be sold, at LTFV.

Second remand

On December 28, 1981, the Court of International Trade remanded the case to the Commission for a second time and directed the Commission to--

> determine whether the Revere Sugar Corp. suffered injury within the meaning of this statute and if not, whether there is any reason to conclude that those who were injured are the producers of all or almost all the production in the region. The ITC shall report its determination to the Court within 120 days of the date of entry of this order.

3/ Atlantic Sugar, Ltd., et al. v. United States, Slip Op. 81-62, 15 Cust. Bull. & Decisions 69, 75-76 (Ct. Int'l. Trade 1981), July 8, 1981.

In arriving at its determination in response to the second remand, the Commission gave due consideration to information obtained during the course of investigation No. 731-TA-3 (Final), as later corrected.

By order of the Commission.

Kenneth R. Mason
Secretary

Issued: April 26, 1982

VIEWS OF CHAIRMAN BILL ALBERGER, VICE CHAIRMAN MICHAEL J. CALHOUN, AND COMMISSIONER ALFRED ECKES 4/

These views are submitted in response to the December 28, 1981, order of the United States Court of International Trade 5/ remanding to the Commission investigation No. 731-TA-3 (Final), Sugars and Sirups from Canada. In October of 1981, the Commission 6/ 7/ on the basis of corrected data affirmed its original determination that there was a regional industry in the Northeastern states region. Although the corrected data demonstrated that the Revere Sugar Corporation, one of the largest producers in the region, had a profit rather than a loss, the Commission went on to reaffirm its original finding that the producers of all or almost all of the production within the region were materially injured. The Commission found that the reported aggregate profits for the seven regional producers had continued to decline, noting that the decline had simply not been as steep as the original data had indicated. 8/ The Commission also took the position that in determining whether the producers of all or almost all of the production within a regional market are materially injured, it can rely on aggregate data.

4/ Commissioner Stern joins in the finding that the Revere Sugar Corporation is materially injured by reason of the subject imports and in its additional views on regional industry, making these findings unanimous. Commissioner Stern dissents from the majority finding that the producers in the Northeastern states geographical area constitute an appropriate regional industry for the purposes of this investigation and reaches a negative determination with respect to the national industry.

Commissioners Frank and Haggart did not participate in this determination.

5/ Atlantic Sugar, Inc. v. United States, Slip Op. 81-119, Dec. 28, 1981.

6/ Commissioner Eckes did not participate in that determination or the original determination.

7/ Commissioner Stern dissenting.

8/ Sugars and Sirups From Canada, Inv. No. 731-TA-3 (Final), October 1981 (hereinafter cited as October 1981 decision) at 14.

On December 28, 1981, the Court of International Trade affirmed the Commission's determination that a Northeastern states region exists, but took exception with the Commission's analysis regarding material injury. Specifically, the Court (per Judge Watson) disagreed with the Commission's use of aggregate data to determine whether producers of all or almost all of the production within the region were materially injured. Instead the Court determined that in a regional industry case the Commission must make an individual injury determination for each producer within the region and then determine whether the injured producers are the producers of all or almost all of the production within the region.

> Injury to an industry cannot be determined without first finding injury to individual producers. That is the unalterable and logical progression of the statutory determination. . . . It seems to the Court that individual firm data are the foundation of this determination and it is only when the facts show injury to individual producers that they may be utilized for broader conclusions about the industry. Furthermore, a conclusion about injury to the industry cannot be made until it is determined that those who are injured individually are, in the aggregate, the producers of "all or almost all" of the region's production. Thus, the only aggregation permitted by the law is that of the production of those who have been injured individually. If their production represents all or almost all of the region's production then the industry has been injured within the meaning of the law. [Emphasis in the original.] 9/

The Court went on to order the Commission to determine specifically whether the Revere Sugar Corporation was materially injured by Canadian imports. The Court also stated that, if the Commission determines that Revere was materially injured, "it may be linked with those other producers who were

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9/ Atlantic Sugar v. United States, supra, at 9, 10.

injured. If the entire injured group produces all or almost all of the production, then a finding of injury to the industry is proper." 10/

In response to this order, we will first separately examine the individual producers within the region to determine whether each was materially injured. We will then combine the data for the injured producers and determine whether they account for all or almost all of the production within the region. We will then discuss our interpretation of the statute.

Revere Sugar Corporation was materially injured by reason of less-than-fair-value (LTFV) imports from Canada 11/

On December 28, 1981, the Court of International Trade ordered the Commission to determine whether as of March 6, 1980, the Revere Sugar Corporation was materially injured by reason of Canadian LTFV imports of sugars and sirups. We determine that Revere was materially injured.

The data in the record concerning injury to Revere covers a period of only two years--1978 and 1979. Profit-and-loss data for 1978 covered the partial accounting year from December 15, 1977, to July 1, 1978, and for 1979 the full accounting year from July 2, 1978, to June 30, 1979.

* * * * 12/ 13/ 14/

10/ Id. at 11.

11/ Commissioner Stern joins the majority in this section of the views.

12/ The data for production, capacity, person-hours worked, worker production and profits from Revere's questionnaire include data for Revere's Chicago plant.

13/ Revere Sugar Corporation acquired the business of the Sweetener Division of Sucrest Corporation on Dec. 14, 1977, under the terms of an agreement dated July 30, 1977. After the sale, Sucrest changed its name to the Ingredient Technology Corporation. Revere responded to the Commission's questionnaire, but only provided data for operations subsequent to this acquisition. Although the staff made inquiries concerning operations prior to the acquisition, Revere officials indicated that data for operations prior to acquisition were not available and probably were still being held by Ingredient Technology Corporation.

14/ There is no alternative to this estimate as Revere did not give the Commission data that could be broken down by month or quarter which would enable the Commission to make a six month comparison.

Revere was consistently undersold by one or both of the Canadian producers from 1978 to 1980, sometimes by substantial margins. This indicates that Canadian imports were a cause of the material injury experienced by Revere. 15/ Revere also argued strongly that it was being materially injured by Canadian imports. 16/

The Canadian producers have argued that Revere's prices were the lowest in the market and the cause of injury to the domestic industry, and have alleged that Revere's ability to reduce prices was due to an agreement with the Philippine Exchange Company, Inc. (Philex) for a 5-year period which allegedly guaranteed Revere a profit. The auditors' report attached to the Revere questionnaire noted * * * * It is not at all clear that Revere was guaranteed a profit by the terms of the agreement. This state of affairs, in combination with the actual prices of both the Canadian producers and Revere, indicate that Revere was, in fact, not the price leader.

15/ Commissioner Stern notes: I have reached the above finding regarding Revere to satisfy the Court's remand order. My finding that the Canadian imports are a causal factor of material injury to Revere depends in part on the fact that both the Canadian imports and Revere are competing in the same Northeastern states geographical area. As explained in my separate views which follow, I do not believe that the circumstances are appropriate for a regional industry treatment.

16/ Letter of Leroy Gross, Vice President & Controller, Revere Sugar Corp., to Mr. Fry, Director of Investigations, USITC, dated January 11, 1980 with attached telex (Exhibit 11 of public documents submitted to U.S. Court of International Trade).

Amstar Corporation was materially injured by reason of LTFV imports from Canada

* * * * This combined with substantial margins of underselling by the Canadian producers and confirmed lost sales indicate that Amstar was materially injured by reason of Canadian LTFV imports.

* * * * 17/

When weighted average prices are examined for 1978 and 1979, it is apparent that both Canadian producers consistently undersold Amstar by substantial margins. Sales lost by Amstar to Canadian sugar were also confirmed.

National Sugar Refining Co. was materially injured by reason of LTFV imports from Canada

We determine that National Sugar Refining Co. was materially injured by reason of Canadian LTFV imports because * * * * Causation is demonstrated by the substantial margins of underselling and confirmed lost sales.

* * * * 18/

During 1978 and 1979 both Canadian producers undersold National by substantial margins and lost sales were confirmed to Canadian producers.

Refined Syrups and Sugars, Inc. was materially injured by reason of LTFV imports from Canada

We determine that Refined Syrups and Sugars (Refined Sugars) was materially injured by reason of Canadian LTFV imports because of * * * * and the fact that the two Canadian producers consistently undersold Refined Sugars by substantial margins.

17/ Profits for Amstar's sugar operations include its cane sugar operations outside the Northeastern region.

18/ The 1976 figures include data for only 10 months.

* * * * Furthermore, during 1978 and 1979 both Canadian producers consistently undersold Refined Sugars by substantial margins. We conclude, therefore, that Refined Sugars was materially injured by Canadian LTFV imports.

Michigan Sugar Co. was not materially injured or threatened with material injury by reason of Canadian LTFV imports

* * * * The Commission concludes that this company was not materially injured by reason of Canadian LTFV imports. There is nothing on the record to suggest a threat of material injury to the Michigan Sugar Co. by reason of Canadian LTFV imports.

Monitor Sugar Co. was not materially injured or threatened with material injury by reason of Canadian LTFV imports

* * * * The Monitor Sugar Co., therefore, was not materially injured by Canadian LTFV imports. There is nothing on the record to suggest threat of material injury to Monitor Sugar Co.

Northern Ohio Sugar Co. was materially injured by reason of LTFV imports from Canada

* * * *

Although we do not have any specific price information from Northern Ohio, during October 1978 to March 1979, the Canadian producers were the consistent price leaders in the region. 19/ We, therefore, conclude that Canadian imports caused material injury to Northern Ohio.

19/ Northern Ohio did not supply requested information on production, pricing, capacity, employment, wages, inventories, capital expenditures, and research and development expenditures.

Producers of all or almost all of the production within the regional market were materially injured

Revere, Amstar, National, Refined Syrups and Sugars and Northern Ohio which account for over * * * percent of the production within the region were materially injured by Canadian imports. Therefore, we determine that producers of all or almost all of the production within the region were materially injured. The only two companies that were not materially injured or threatened with material injury were Michigan and Monitor Sugar Companies which are located on the perimeter of the Northeastern Region and account for less than *** percent of the production within the region. 20/

Additional views on regional industry analysis 21/

Having addressed what we understand to have been the Court's request of us, we nevertheless feel obliged to express our strong reservation regarding the Court's interpretation of Section 771(4)(c). In its reading, the Court has found that the language ". . . producers of all, or almost all, of the production within that market are being materially injured . . ." requires us first to determine whether each individual producer in the region is materially injured by reason of LTFV imports, then to combine the injured producers to determine whether they account for all or almost all of the production within the region. Clearly, this methodology is consistent with the statutory language.

The language of section 771(4)(c), however, may also be read as permitting a somewhat different analytical approach. This alternative

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20/ * * * *

21/ Commissioner Stern joins the majority in this section of the views.

methodology is to examine the aggregate data from the various combinations of producers which represent all or almost all of the production in the region and determine whether, as a group, they suffer material injury by reason of imports. This is the approach we have used in each of our regional industry investigations thus far. Not only do we find that this approach is also consistent with the statutory language and the legislative history, 22/ it is, as well, free of the administrative burdens and conflicts with other statutory provisions which accompany the Court's approach.

Indeed, in our view, the Court's reading of section 771(4)(C) presents three serious problems. First, all of our determinations prior to the 1979 Trade Agreements Act relied on aggregate data. 23/ We strongly believe that this approach, while greatly different from the Court's view, does no violence to the language of the statute. If the Congress wanted that practice to change in order to make individual determinations in regional cases, it would have made its intent clearer in the statutory language and would have addressed the change in Commission reports which address other significant changes. Instead, the Congress indicated its concern for other policy considerations, including the need for a speedy, open decisionmaking process with a minimum burden on both the Commission and the public. Second, the

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22/ The Reports of the Ways and Means and Senate Finance Committees address this issue only by way of reciting the statutory language. See Committee on Ways and Means, U.S. House of Representatives, Report No. 96-317, 96th Cong., 1st Sess., p. 73, and Committee on Finance, U.S. Senate, Report No. 96-249, 96th Cong., 1st Sess., p. 83.

23/ Chairman Alberger notes that in the Commission's historical practice of primarily relying on aggregate data, it often looks at data from individual producers to help assess the impact of LTFV or subsidized imports on the domestic industry. Aberrations from aggregate trends often provide valuable insights into the overall problems facing an industry.

Court's analysis poses a substantial administrative burden on the Commission and on the public. Third, it has a serious adverse impact on the Commission's mandate to undertake an open decisionmaking process.

Regarding the second point, in a case such as this in which there are fewer than ten producers in the region, the individual determinations required by the Court's interpretation can usually be made. But in those regional cases in which there are a greater number of producers, it may become administratively impossible to make such individual determinations. For example, in Fish, Fresh, Chilled, or Frozen, Whether or Not Whole, But Not Otherwise Prepared or Preserved, From Canada, Inv. No. 701-TA-40 (Final), USITC Pub. 1066, the Commission found an Eastern regional industry consisting of 700 New England fishing vessels and 71 Atlantic Coast processing firms. Plainly, it would have been prohibitive as a practical matter for the Commission to make individual material injury and causation determinations for 700 separate fishing vessels and 71 separate fish processors in the preliminary and final investigations. 24/ Even if this analysis could be made, the statutory time constraints and the unavailability of data would have made such a task impossible.

A number of other cases involving a large number of domestic producers in which regional considerations were present demonstrate even further the frequency and magnitude of the potential problem with the Court's analysis causes. In Tomato Products from the European Community, Inv. Nos. 701-TA-42-50, USITC Pub. 1076, the domestic tomato processing industry

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24/ In the entire United States, there were more than 1,000 fishing vessels and 100 fish processors.

consisted of more than 200 firms, and in Fresh Cut Roses from the Netherlands, Inv. No. 701-TA-21, USITC Pub. 1041, the domestic rose industry consisted of over 400 individual producers.

It has long been accepted Commission practice that in cases with a large number of producers, such as Fresh Cut Roses, our data are gathered by sampling. Sampling lessens the administrative burden on both the Commission and the public. It allows us to conduct as complete and factual an analysis as is possible given the statutory deadlines within which we must reach these determinations. The Court's interpretation of our responsibilities in regional cases would deny us this investigative tool.

In addition, injury and causation determinations for individual producers create a burden on the public. Producers which account for only a fraction of a percent of the production within the region would be required to answer questionnaires even though it is clear that only a few of the domestic producers account for the bulk, but not "all or almost all," of the production within the region. The recently enacted Paperwork Reduction Act charges the Commission with reducing the administrative burden on the public. Section 3507(a)(1)(B) states: "An agency shall not conduct or sponsor the collection of information unless, in advance of the adoption or revision of the request for collection of such information--the agency has taken actions . . . to reduce to the extent practicable and appropriate the burden on persons who will provide information to the public." 25/ It is our experience that the Court's requirement is in direct conflict with this provision. Since individual injury and causation determinations for each producer effectively

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25/ Public Law 96-511, 94 Stat. 2820 (Dec. 11, 1980).

preclude the use of sampling, the Court's decision will significantly increase rather than decrease the volume of information required from the public.

Furthermore, there are instances during an investigation in which producers, often the smaller companies, do not respond to Commission questionnaires and the Commission often cannot, within the short statutory time limits, utilize its subpoena authority. 26/ When questionnaires are not returned in preliminary cases, the Commission relies on the best information available, that is the aggregate data. Under the regional industry standard compelled in this remand, if the Commission does not receive data from producers of all or almost all of the production, the entire industry might be deprived of relief because of the recalcitrance of a few producers.

In our view, given the strict time limitations imposed by the Trade Agreements Act of 1979 and in the absence of clearly compelling language to the contrary, the drafters of the Act surely did not intend to hamper the Commission with the requirement of numerous separate individual determinations in regional industry investigations. An administrative agency always has the authority to respond to the administrative difficulties of implementing the commands of the substantive statute. As the United States Court of Appeals for the District of Columbia has stated:

> Considerations of administrative necessity may be a basis for finding implied authority for an administrative approach not explicitly provided in the statute. The relevance of such considerations to the regulatory process has long been recognized. Courts frequently uphold streamlined agency approaches or procedures where the conventional course, typically case-by-case determinations, would, as a practical matter, prevent the agency from carrying out the mission assigned to it by Congress. 27/

26/ See Fish, Fresh, Chilled, or Frozen, Whether or Not Whole, But Not Otherwise Prepared or Preserved, From Canada, Inv. No. 701-TA-40 (Final), USITC PUb. 1066, at 11.

27/ Alabama Power Co. v. Costle, 636 F.2d, 323, 358 (D.C. Cir. 1979).

In this connection, because of administrative impracticality and the added burden on the public, we have in all regional industry cases relied on aggregate data from questionnaires. In some instances, this data has represented fewer than all of the producers within the regional industry. As a practical matter, without such a practice, we may not be able to carry out the statutory mandate.

The third problem the Court's requirement poses is that it runs afoul of one of the goals of the Trade Agreements Act of 1979. From the legislative history it is clear that in passing this legislation Congress attempted to balance the public and the international interest in open hearings against the interest in keeping business information confidential. The Senate Committee on Finance Report states that one of the principal elements of both the Subsidy and Antidumping Agreements was:

> Provisions for "transparency" in all phases of a countervailing duty or dumping case, including publication of laws and regulations, investigations, and decisions, and access to information on which decisions are based, subject to protection of legitimately confidential information, S. Rep. No. 96-249, 96th Cong., 1st Sess. at 41.

Furthermore, section 774(b) provides: "Procedures--Any hearing required or permitted under this title shall be conducted after notice published in the Federal Register, and a transcript of the hearing shall be prepared and made available to the public." [Emphasis added.] Thus, Congress intended that hearings in antidumping and countervailing duty cases be open to the public. Derogations ought to be exceptional in nature and few in number.

If, as the Court has suggested, individual determinations are required in regional industry cases, most of the conferences and hearings now open would

have to be closed to the public. Commission reports would contain substantial amounts of confidential data. Commission opinions would be equally limited. Such a circumstance would be contrary to the United States position in our trade negotiations with foreign countries in which the executive branch has been advocating greater transparency in the decisionmaking process. Closing the decisionmaking process would also be inconsistent with Congressional intent. We cannot believe that Congress could have intended such a result without specifying more clearly the changes in Commission practice it desired.

VIEWS OF COMMISSIONER PAULA STERN

In response to the December 28, 1981, order of the United States Court of International Trade, 28/ I have determined that as of March 6, 1980, the Revere Sugar Corporation was materially injured by reason of the importation of sugars and sirups from Canada sold, or likely to be sold, at less than fair value.

I also reiterate my earlier conclusion that circumstances are not appropriate for the consideration of the Northeastern geographic area as a separate and isolated region. 29/ Accordingly, I reaffirm my previous determination that an industry in the United States was not materially injured or threatened with material injury by reason of the importation of sugars and sirups from Canada.

Revere Sugar Corporation is materially injured

On December 28, 1981, the Court of International Trade ordered the Commission to determine whether as of March 6, 1980, the Revere Sugar Corporation was materially injured by reason of Canadian imports of sugars and sirups. I determine that Revere was materially injured. I have fully joined the majority analysis on this finding and will not repeat it here. I also concur in the "Additional views on regional industry analysis" of the majority. 30/

28/ Atlantic Sugar, Inc. v. United States, Slip Op. 81-119, Dec. 28, 1981.
29/ See Sugar and Sirups from Canada, Inv. No. 731-TA-3(Final), October 1981, Views of Commissioner Stern (hereinafter cited as October 1981 decision) at 18.
30/ See "Views of the Commission" at pp. 3-5 and pp. 9-14.

Reaffirmation of previous determination

In my October 1981 decision, I determined that the Northeastern area was not a separate and isolated regional market and therefore, went on to examine the entire nation's sugar production as a whole. In that opinion, I stated:

> A careful reexamination of the regional industry issue in light of the corrected data has been primarily responsible for my negative determination in the remanded case. Because U.S. producers in the Northeastern states area are not sufficiently separate or isolated to constitute a regional industry, the relevant domestic industry should encompass the entire nation and not the region found by the Commission in the original case or the majority in the present one. 31/
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> * * *
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> I have found that no natural or commercial reasons outside the control of the sugar producers themselves severely limit the quantities of sugar that can flow between geographical areas. Rather, the pattern of supply seems to reflect the historical distribution practice which in and of itself is not a sufficient basis to find that the market is isolated or separate as required by law. [Emphasis in original.] 32/

In his December 28 opinion, however, Judge Watson did not determine that the Northeastern states are a separate and isolated region. Rather, he determined that the majority's finding of a region was supported by substantial evidence and not at variance with the law. Therefore, my original finding on regionality was not at variance with the Court's order.

Under section 771(4)(C) the application of a regional industry definition is discretionary. The language of the section provides that "In appropriate circumstances . . . the producers within each market may be treated as if they were a separate industry . . . ." [emphasis added]. The Commission does not have a statutory obligation to make a regional industry finding even in cases where "appropriate circumstances" for such a finding exist. As I noted in my

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31/ October 1981 decision at 18.
32/ Id. at 19.

October 1981 determination, I do not believe appropriate circumstances for regional industry treatment exist in this case where the sole basis for the geographic distribution of supply is historical marketing practices.

Accordingly, my analysis of injury and causation have once again been made on a national basis. The national data have not changed in any significant fashion. (Corrections to the data primarily affected only the results for the Northeastern states geographic area.) Therefore, the analysis I made in the two prior determinations remains intact: although the raw sugar processing industry was injured, Canadian imports were not a cause of material injury to the nationwide domestic industry, as I continue to believe that industry is most appropriately defined.

A report (USITC Publication 1047) containing the information developed in investigation No. 731-TA-3, Sugar and Sirups from Canada, was released in March 1980. Copies of this report are available from the Office of the Secretary, U.S. International Trade Commission, 701 E Street, NW., Washington, D.C. 20436.

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