

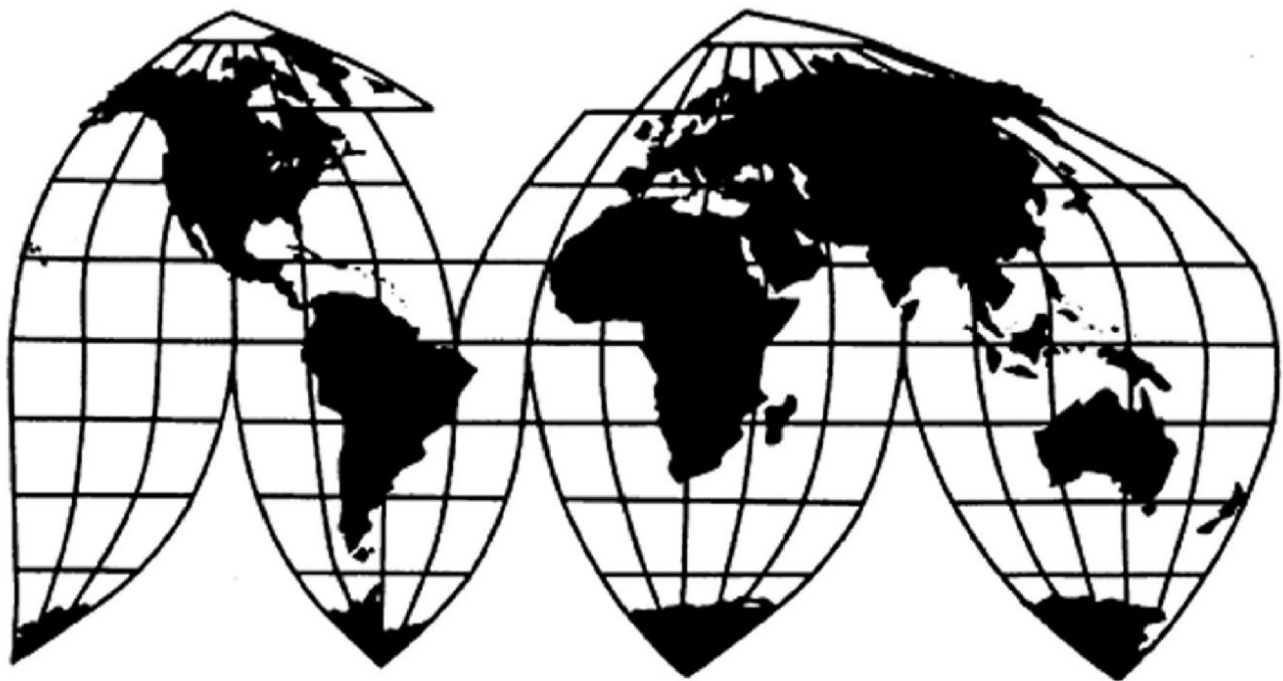
Paper Plates from China, Thailand, and Vietnam

Investigation Nos. 701-TA-704–705 and 731-TA-1664–1666 (Final)

Publication 5595

March 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Note.—Information that would reveal confidential operations of individual firms may not be published.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.

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-704-705 and 731-TA-1664-1666 (Final)

Paper Plates from China, Thailand, and Vietnam

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 paper plates from China, Thailand, and Vietnam, provided for in subheading 4823.69.00 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 that have been found to be subsidized by the governments of China and Vietnam.^{2 3}

BACKGROUND

The Commission instituted these investigations effective January 25, 2024, following receipt of petitions filed with the Commission and Commerce by the American Paper Plate Coalition, which is comprised of AJM Packaging Corporation, Bloomfield Hills, Michigan, Aspen Products, Inc., Kansas City, Missouri, Dart Container Corporation, Mason, Michigan, Hoffmaster Group, Inc., Oshkosh, Wisconsin, Huhtamaki Americas, Inc., De Soto, Kansas, and Unique Industries, Inc., Philadelphia, Pennsylvania. The final phase of the investigations was scheduled

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 8271; 90 FR 8262; 90 FR 8265; 90 FR 8281; 90 FR 8258 (January 28, 2025).

³ The Commission also finds that imports subject to Commerce’s affirmative critical circumstances determinations are likely to undermine seriously the remedial effect of the countervailing and antidumping duty orders on paper plates from China (Commissioner David S. Johanson dissenting), and are not likely to undermine seriously the remedial effect of the antidumping duty order on paper plates from Thailand or the countervailing and antidumping duty orders on paper plates from Vietnam (Commissioner Jason E. Kearns dissenting on Vietnam).

by the Commission following notification of preliminary determinations by Commerce that imports of paper plates from China and Vietnam were subsidized within the meaning of section 703(b) of the Act (19 U.S.C. 1671b(b)) and imports of paper plates from China, Thailand, and Vietnam were sold at LTFV within the meaning of 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 *Federal Register* on September 18, 2024 (89 FR 76508). Since one interested party requested cancellation of the hearing after no other parties submitted a request to appear at the hearing, the public hearing in connection with the investigations, originally scheduled for January 23, 2025, was cancelled (90 FR 8142, January 24, 2025).

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 paper plates from China, Thailand, and Vietnam found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value and imports of paper plates from China and Vietnam found by Commerce to be subsidized by the governments of China and Vietnam. We find that critical circumstances exist with respect to imports of paper plates from China that are subject to Commerce’s final affirmative critical circumstances determinations.¹ We also find that critical circumstances do not exist with respect to imports of paper plates from Thailand and Vietnam that are subject to Commerce’s final affirmative critical circumstances determinations.²

I. Background

The petitions in these investigations were filed on January 25, 2024, by the American Paper Plate Coalition (“APPC”), a coalition consisting of six domestic producers of paper plates in the United States.³ The APPC submitted a prehearing brief, posthearing brief, and final comments.⁴

¹ Commissioner Johanson has made a negative critical circumstances finding with respect to imports of paper plates from China. See Separate Views of Commissioner David S. Johanson.

² Commissioner Kearns has made an affirmative critical circumstances finding with respect to imports of paper plates from Vietnam. See Separate Views of Commissioner Jason E. Kearns.

³ The six domestic producers that constitute the APPC are: AJM Packaging Corporation (“AJM”); Aspen Products, Inc. (“Aspen”); Dart Container Corporation (“Dart Container”); Hoffmaster Group, Inc. (“Hoffmaster”); Huhtamaki Americas, Inc. (“Huhtamaki”); and Unique Industries, Inc. (“Unique Industries”). Confidential Staff Report, INV-XX-020 (Feb. 11, 2025) (“CR”) at I-1; *Certain Paper Plates from China, Thailand, and Vietnam*, Inv. Nos. 701-TA-704-705 and 731-TA-1664-1666 (Final), USITC Pub. 5595 (March 2025) (“PR”) at I-1.

⁴ APPC Prehearing Br., EDIS Doc. 841169 (Jan. 15, 2025); APPC Posthearing Br., EDIS Doc. 842273 (January 30, 2025); APPC Final Comments, EDIS Doc. 843875 (Feb. 19, 2025). On January 17, 2025, counsel for the APPC requested that the Commission cancel the hearing in connection with these investigations scheduled for January 23, 2025. Given that no parties other than the APPC had requested to appear, the APPC withdrew its request to appear at the hearing and expressed its willingness to submit written responses to any Commission questions in lieu of a hearing. APPC Withdrawal of Request to Appear at Hearing, EDIS Doc. 841301 (Jan. 17, 2025). Because no party to the investigations requested to participate in the hearing, the Commission cancelled the hearing, and instead, issued written questions to the parties. *Paper Plates from China, Thailand, and Vietnam: Cancellation of hearing for final phase antidumping and countervailing duty investigations*, 90 Fed. Reg. 8142 (Jan. 24, 2025).

Five respondent entities participated in the final phase of the investigations: Target General Merchandise, Inc. (“Target”), Acadian Crossing Consumer Products, LLC (“Acadian”), the Cannon Group Inc. (“Cannon Group”), Hallmark Cards, Inc. (“Hallmark”), and Sophistiplate LLC (“Sophistiplate”), U.S. importers of subject merchandise.⁵ Target and Acadian each submitted prehearing briefs and posthearing briefs.⁶ The Cannon Group submitted a prehearing brief.⁷ Hallmark and Sophistiplate jointly submitted a posthearing brief.⁸

U.S. industry data are based on the questionnaire responses of eight U.S. producers that accounted for the vast majority of domestic production of paper plates in 2023.⁹ U.S. import data are based on the questionnaire responses of 26 U.S. importers accounting for *** percent of paper plate imports from China, *** paper plate imports from Thailand, *** paper plate imports from Vietnam, *** percent of nonsubject imports, and *** percent of total imports of paper plates classified under HTS statistical reporting number 4823.69.0040.¹⁰ Foreign industry data and related information are based on the questionnaire responses of four firms, *** of which are producers/exporters in China estimated to have accounted for *** percent of paper plate production in China and *** percent of U.S. imports of paper plates from China in 2023; *** producer/exporter in Thailand estimated to have accounted for *** percent of paper plate production in Thailand and *** percent of U.S. imports of paper plates from Thailand in 2023; and *** producer/exporter in Vietnam estimated to have accounted for *** percent of paper plate production in Vietnam and *** percent of U.S. imports of paper plates from Vietnam in 2023.¹¹

⁵ During the period of investigation, Target imported subject paper plates from ***; Acadian imported subject paper plates from ***; Cannon Group imported subject paper plates from ***; Hallmark imported subject paper plates from ***; and Sophistiplate imported subject paper plates from ***. Target U.S. Importer Questionnaire Response; Acadian U.S. Importer Questionnaire Response; Cannon Group U.S. Importer Questionnaire Response; Hallmark U.S. Importer Questionnaire Response; and Sophistiplate U.S. Importer Questionnaire Response.

⁶ Target Prehearing Br., EDIS Doc. 841166 (Jan. 15, 2025); Target Posthearing Br., EDIS Doc. 842284 (Jan. 30, 2025); Acadian Prehearing Br., EDIS Doc. 841175 (Jan. 15, 2025); Acadian Posthearing Br., EDIS Doc. 842210 (Jan. 30, 2025).

⁷ Cannon Group Prehearing Br., EDIS Doc. 841173 (Jan. 15, 2025).

⁸ Hallmark Posthearing Br., EDIS Doc. 84228 (Jan. 30, 2025).

⁹ CR/PR at III-1.

¹⁰ CR/PR at IV-1. These data may understate the data coverage afforded by importers questionnaire responses because HTS statistical reporting number 4823.69.0040 is a basket category that includes both in-scope paper plates and out-of-scope merchandise (*e.g.*, ***). The volume of nonsubject imports may also be ***. *See id.* at n.4.

¹¹ CR/PR at Table VII-1.

II. Domestic Like Product

A. In General

In determining whether an industry in the United States is materially injured or threatened with material injury by reason of imports of subject merchandise, the Commission first defines the “domestic like product” and the “industry.”¹² Section 771(4)(A) of the Tariff Act of 1930, as amended (“the Tariff Act”), defines the relevant domestic industry as the “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”¹³ In turn, the Tariff Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation.”¹⁴

By statute, the Commission’s “domestic like product” analysis begins with the “article subject to an investigation,” *i.e.*, the subject merchandise as determined by Commerce.¹⁵ Therefore, Commerce’s determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value is “necessarily the starting point of the Commission’s like product analysis.”¹⁶ The Commission then defines the domestic like product in light of the imported articles Commerce has identified.¹⁷ The decision regarding the appropriate domestic like product(s) in an investigation is a factual determination, and the Commission has applied the statutory standard of “like” or “most similar in characteristics and

¹² 19 U.S.C. § 1677(4)(A).

¹³ 19 U.S.C. § 1677(4)(A).

¹⁴ 19 U.S.C. § 1677(10).

¹⁵ 19 U.S.C. § 1677(10). The Commission must accept Commerce’s determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value. *See, e.g., USEC, Inc. v. United States*, 34 Fed. App’x 725, 730 (Fed. Cir. 2002) (“The ITC may not modify the class or kind of imported merchandise examined by Commerce.”); *Algoma Steel Corp. v. United States*, 688 F. Supp. 639, 644 (Ct. Int’l Trade 1988), *aff’d*, 865 F.3d 240 (Fed. Cir.), *cert. denied*, 492 U.S. 919 (1989).

¹⁶ *Cleo Inc. v. United States*, 501 F.3d 1291, 1298 (Fed. Cir. 2007); *see also Hitachi Metals, Ltd. v. United States*, Case No. 19-1289, slip op. at 8-9 (Fed. Circ. Feb. 7, 2020) (the statute requires the Commission to start with Commerce’s subject merchandise in reaching its own like product determination).

¹⁷ *Cleo*, 501 F.3d at 1298 n.1 (“Commerce’s {scope} finding does not control the Commission’s {like product} determination.”); *Hosiden Corp. v. Advanced Display Mfrs.*, 85 F.3d 1561, 1568 (Fed. Cir. 1996) (the Commission may find a single like product corresponding to several different classes or kinds defined by Commerce); *Torrington Co. v. United States*, 747 F. Supp. 744, 748–52 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (affirming the Commission’s determination defining six like products in investigations where Commerce found five classes or kinds).

uses” on a case-by-case basis.¹⁸ No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.¹⁹ The Commission looks for clear dividing lines among possible like products and disregards minor variations.²⁰

B. Product Description

Commerce defined the imported merchandise within the scope of these investigations as follows:

. . . {C}ertain paper plates. Paper plates subject to this investigation may be cut from rolls, sheets, or other pieces of paper and/or paper board. Paper plates subject to this investigation have a depth up to and including two (2.0) inches, as measured vertically from the base to the top of the lip, or the edge if the plate has no lip. Paper plates subject to this investigation may be uncolored, white, colored, or printed. Printed paper plates subject to this investigation may have any type of surface finish, and may be printed by any means with images, text and/or colors on one or both surfaces. Colored paper plates subject to this investigation may be colored by any method, including but not limited to printing, beater-dyeing, and dip-dyeing. Paper plates subject to this investigation may be produced from paper of any type (including, but not limited to, bamboo, straws, bagasse, hemp, kenaf, jute, sisal, abaca, cotton inters and reeds, or from non-plant sources, such as synthetic resin (petroleum)-based resins), may have any caliper or basis weight, may have any shape or size, may have one or more than one section, may

¹⁸ See, e.g., *Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Dep’t of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int’l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Torrington Co. v. United States*, 747 F. Supp. 744, 749 n.3 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (“every like product determination ‘must be made on the particular record at issue’ and the ‘unique facts of each case’”). The Commission generally considers a number of factors, including the following: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions of the products; (5) common manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price. See *Nippon*, 19 CIT at 455 n.4; *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996).

¹⁹ See, e.g., S. Rep. No. 96-249 at 90-91 (1979).

²⁰ *Nippon*, 19 CIT at 455; *Torrington*, 747 F. Supp. at 748-49; see also S. Rep. No. 96-249 at 90-91 (Congress has indicated that the like product standard should not be interpreted in “such a narrow fashion as to permit minor differences in physical characteristics or uses to lead to the conclusion that the product and article are not ‘like’ each other, nor should the definition of ‘like product’ be interpreted in such a fashion as to prevent consideration of an industry adversely affected by the imports under consideration.”).

be embossed, may have foil or other substances adhered to their surface, and/or may be uncoated or coated with any type of coating.

The paper plates subject to this investigation remain covered by the scope of this investigation whether imported alone, or in any combination of subject and non-subject merchandise. When paper plates subject to this investigation are imported in combination with non-subject merchandise, only the paper plates subject to this investigation are subject merchandise.

The paper plates subject to this investigation include paper plates matching the above description that have been finished, packaged, or otherwise processed in a third country by performing finishing, packaging, or processing that would not otherwise remove the merchandise from the scope of the investigation if performed in the country of manufacture of the paper plates. Examples of finishing, packaging, or other processing in a third country that would not otherwise remove the merchandise from the scope of the investigation if performed in the country of manufacture of the paper plates include, but are not limited to, printing, application of other surface treatments such as coatings, repackaging, embossing, and application of foil surface treatments.

Excluded from the scope of this investigation are paper plates molded or pressed directly from paper pulp (including but not limited to unfelted pulp), which are currently classifiable under subheading 4823.70.0020 of the Harmonized Tariff Schedule of the United States (HTSUS).

Also excluded from the scope of this investigation are articles that otherwise would be covered but which exhibit the following two physical characteristics: (a) depth (measured vertically from the base to the top of the lip, or edge if no lip) equal to or greater than 1.25 inches but less than two (2.0) inches, and (b) a base not exceeding five (5.0) inches in diameter if round, or not exceeding 20 square inches in area if any other shape.

Also excluded from the scope of this investigation are paper bowls, paper buckets, and paper food containers with closeable lids.²¹

²¹ *Certain Paper Plates from the People's Republic of China: Final Affirmative Determination of Sales at Less than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 90 Fed. Reg. 8271 (Jan. 28, 2025); *Certain Paper Plates from the People's Republic of China: Final Affirmative Countervailing Duty Determination and Final Affirmative Determination of Critical* (Continued...)

Paper plates are used as tableware for casual dinners, picnics, large formal gatherings, or any event where the plate is to be discarded after eating.²² They are produced from paper or paperboard and can have any thickness or basis weight and can be any size or shape.²³ They may be white, colored, or printed and/or laminated with images, text, and/or colors on one or both surfaces.²⁴ They also can have one or more sections, be fluted or unfluted, and be uncoated or have any surface finish, including but not limited to coating, laminating, cold-stamping, hot-stamping, die-cutting, and/or embossing.²⁵

C. Arguments

The APPC argues that the Commission should define a single domestic like product consisting of paper plates, coextensive with the scope, as it did in the preliminary phase of the investigations.²⁶ No respondent party raised any argument regarding the definition of the domestic like product.

D. Analysis

In its preliminary determinations, the Commission defined a single domestic like product consisting of all paper plates, coextensive with Commerce's scope.²⁷ The Commission found that all paper plates covered by the scope shared the same basic physical characteristics and end uses, were manufactured using the same facilities, processes, and employees, and could be used interchangeably. In addition, all in-scope paper plates were sold primarily to retailers,

(...Continued)

Circumstances, in Part, 90 Fed. Reg. 8281 (Jan. 28, 2025); *Certain Paper Plates from Thailand: Final Affirmative Determination of Sales at Less than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 90 Fed. Reg. 8262 (Jan. 28, 2025); *Certain Paper Plates from the Socialist Republic of Vietnam: Final Affirmative Determination of Sales at Less than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 90 Fed. Reg. 8265 (Jan. 28, 2025); and *Certain Paper Plates from the Socialist Republic of Vietnam: Final Affirmative Countervailing Duty Determination and Final Affirmative Determination of Critical Circumstances, in Part*, 90 Fed. Reg. 8258 (Jan. 28, 2025).

²² CR/PR at I-11.

²³ CR/PR at I-11.

²⁴ CR/PR at I-11.

²⁵ CR/PR at I-11.

²⁶ APPC Prehearing Br. at 5.

²⁷ *Paper Plates from China, Thailand, and Vietnam*, Inv. Nos. 701-TA-704-705 and 731-TA-1664-1666 (Preliminary), USITC Pub. 5499 at 8-11 (March 2024) ("Preliminary Determinations").

were perceived as a single category of products by customers and producers, and fell within a range of prices depending on product features.²⁸

The Commission also declined to include out-of-scope liquid fiber paper plates in the domestic like product because the record indicated that a clear dividing line separated such plates from in-scope paper plates. While recognizing that out-of-scope liquid fiber paper plates could be used interchangeably with in-scope paper plates and were similar to in-scope paper plates in terms of end uses and channels of distribution, the Commission found that the two products differed in terms of their manufacturing facilities, production processes, and production workers. The record also indicated that customers and producers viewed in-scope paper plates and out-of-scope liquid fiber paper plates to be separate product categories, and that out-of-scope liquid fiber paper plates were priced at a premium relative to in-scope paper plates.²⁹

The record in the final phase of these investigations does not contain any new information or argument concerning the characteristics and uses of paper plates suggesting that the Commission should revisit its definition of the domestic like product from the preliminary determinations.³⁰ Accordingly, we again define a single domestic like product consisting of paper plates, coextensive with the scope.

III. Domestic Industry

The domestic industry is defined as the domestic “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”³¹ In defining the domestic industry, the Commission’s general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

We must determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to section 771(4)(B) of the Tariff Act. This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise

²⁸ Preliminary Determinations, USITC Pub. 5499 at 8-11.

²⁹ Preliminary Determinations, USITC Pub. 5499 at 8-11.

³⁰ See *generally* CR/PR at I-9-14.

³¹ 19 U.S.C. § 1677(4)(A).

or which are themselves importers.³² Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.³³

The record indicates that two U.S. producers, *** and ***, are subject to possible exclusion under the related parties provision because each firm imported subject merchandise during the January 2021-June 2024 period of investigation ("POI").³⁴ In addition, *** reported that it is related ***.³⁵ The APPC argues that appropriate circumstances do not exist to exclude either firm from the definition of the domestic industry because the primary interest of each firm lies in domestic production.³⁶ No respondent party raised any argument regarding the definition of the domestic industry. We analyze below whether appropriate circumstances exist to exclude either domestic producer from the domestic industry.

***. *** accounted for *** percent of U.S. production of paper plates in 2023 and was the *** of the eight reporting U.S. producers that year in terms of U.S. production volume.³⁷ It

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

³³ The primary factors the Commission has examined in deciding whether appropriate circumstances exist to exclude a related party include the following:

- (1) the percentage of domestic production attributable to the importing producer;
- (2) the reason the U.S. producer has decided to import the product subject to investigation (whether the firm benefits from the LTFV sales or subsidies or whether the firm must import in order to enable it to continue production and compete in the U.S. market);
- (3) whether inclusion or exclusion of the related party will skew the data for the rest of the industry;
- (4) the ratio of import shipments to U.S. production for the imported product; and
- (5) whether the primary interest of the importing producer lies in domestic production or importation. *Changzhou Trina Solar Energy Co. v. USITC*, 100 F. Supp.3d 1314, 1326-31 (Ct. Int'l. Trade 2015), *aff'd*, 879 F.3d 1377 (Fed. Cir. 2018); see also *Torrington Co. v. United States*, 790 F. Supp. at 1168.

³⁴ CR/PR at Tables III-11-12.

³⁵ CR/PR at Table III-2. The record does not contain any other information regarding this relationship, including percentage ownership. Consequently, there is no information on the record concerning whether there is a sufficient degree of control over *** and *** for *** to qualify as a related party based upon this relationship. However, as described below, even if *** were to qualify as a related party, there is no information on the record to suggest that its inclusion in the domestic industry would mask injury.

³⁶ APPC Prehearing Br. at 6-7.

³⁷ APPC Prehearing Br. at 6-7.

³⁷ CR/PR at Table III-1.

***.³⁸ *** imported subject merchandise from *** throughout the POI.³⁹ *** imports of subject merchandise during the POI totaled *** paper plates in 2021, *** paper plates in 2022, *** paper plates in 2023, and *** paper plates in interim 2024, compared with *** paper plates in interim 2023.⁴⁰ *** U.S. production of paper plates decreased from *** paper plates in 2021 to *** paper plates in 2023; its U.S. production was *** paper plates in interim 2024, compared with *** paper plates in interim 2023.⁴¹ The ratio of *** subject imports to its domestic production was *** percent in 2021, *** percent in 2022, and *** percent in 2023; it was *** percent in January-June 2024 (“interim 2024”), compared with *** percent in January-June 2023 (“interim 2023”).⁴² *** indicates that it was ***. It further indicates that it imports ***.⁴³

Given that *** ratio of subject imports to domestic production remained very low throughout the POI, its primary interest appears to be in domestic production. There is also no information on the record that *** domestic production operations benefitted from the imports to such an extent that its inclusion in the domestic industry would skew industry data or mask injury. In light of this, and in the absence of any contrary argument, we find that appropriate circumstances do not exist to exclude *** from the domestic industry.

***. *** accounted for *** percent of U.S. production of paper plates in 2023 and was the *** of the eight reporting U.S. producers that year in terms of U.S. production volume.⁴⁴ It ***.⁴⁵ *** reported importing subject merchandise from *** throughout the POI. *** imports of subject merchandise during the POI totaled *** paper plates in 2021, *** paper plates in 2022, *** paper plates in 2023, and *** paper plates in interim 2024, compared with *** paper plates in interim 2023.⁴⁶ *** U.S. production of paper plates increased from *** paper plates in 2021 to *** paper plates in 2022, before decreasing to *** paper plates in 2023; its U.S. production was *** paper plates in interim 2024, compared with *** paper plates in interim 2023.⁴⁷ The ratio of *** subject imports to its domestic production was *** percent in 2021, *** percent in 2022, and *** percent in 2023; it was *** percent in interim 2024, compared

³⁸ CR/PR at Table III-1.

³⁹ CR/PR at Table III-11.

⁴⁰ CR/PR at Table III-11.

⁴¹ CR/PR at Table III-11.

⁴² CR/PR at Table III-11.

⁴³ CR/PR at Table III-13.

⁴⁴ CR/PR at Table III-1.

⁴⁵ CR/PR at Table III-1.

⁴⁶ CR/PR at Table III-12.

⁴⁷ CR/PR at Table III-12.

with *** percent in interim 2023.⁴⁸ Unique Industries explains that it had imported subject paper plates ***, but that ***.⁴⁹ The firm reported capital expenditures of \$*** in 2021, \$*** in 2022, \$*** in 2023, and \$*** in interim 2024, compared with \$*** in interim 2023.⁵⁰ *** operating income to net sales ratio was *** than the domestic industry average in each full year of the POI and in both interim periods.⁵¹

*** ratio of subject imports to domestic production fluctuated but increased overall from 2021 to 2023 as its domestic production decreased and its subject imports increased. However, when the firm *** in interim 2024, its ratio of subject imports to domestic production was much lower compared with interim 2023, as its domestic production was higher and its subject imports were lower. Its capital investments were substantial in 2021 and interim 2024, when ***.⁵² These factors, along with its ***, indicate that *** primary interest is in domestic production.⁵³ The record also does not indicate that *** was shielded from subject import competition by virtue of its *** or that its domestic production operations benefitted from its imports of subject merchandise to such an extent that its inclusion in the domestic industry would skew industry data or mask injury.⁵⁴ In light of this, and in the absence of any contrary argument, we find that appropriate circumstances do not exist to exclude *** from the domestic industry.

Accordingly, consistent with our definition of the domestic like product, we define the domestic industry to include all domestic producers of paper plates.

IV. Negligibility

Pursuant to section 771(24) of the Tariff Act, imports from a subject country of merchandise corresponding to a domestic like product shall be deemed negligible if they account for less than three percent (or four percent in the case of a developing country in a countervailing duty investigation) of all such merchandise imported into the United States

⁴⁸ CR/PR at Table III-12.

⁴⁹ CR/PR at Table III-13; *** U.S. Importer Questionnaire Response at II-13.

⁵⁰ CR/PR at Table VI-5.

⁵¹ *** operating income to net sales ratio was *** percent in 2021, *** percent in 2022, *** percent in 2023, and *** percent in interim 2024, compared with *** percent in interim 2023. CR/PR at Table VI-3.

⁵² CR/PR at Table VI-6.

⁵³ CR/PR at Table III-1.

⁵⁴ Indeed, although *** imported subject merchandise to avoid lost sales prior to the purchase of ***, *** reported *** throughout the POI, except for interim 2024 when it *** and increased domestic production. CR/PR at Table VI-3.

during the most recent 12 months for which data are available preceding the filing of the petition.⁵⁵

The Commission's questionnaire response data indicate that from January 2023 through December 2023, the most recent 12-month period for which data are available preceding the filing of the petitions, subject imports from China accounted for *** percent of total imports, subject imports from Thailand accounted for *** percent of total imports, and subject imports from Vietnam accounted for *** percent of total imports.^{56 57} As subject imports from China, Thailand, and Vietnam are above the statutory threshold, we find that imports from China and Vietnam subject to antidumping and countervailing duty investigations, and imports from Thailand subject to the antidumping duty investigation, are not negligible.

V. Cumulation

For purposes of evaluating the volume and effects for a determination of material injury by reason of subject imports, section 771(7)(G)(i) of the Tariff Act requires the Commission to cumulate subject imports from all countries as to which petitions were filed and/or investigations self-initiated by Commerce on the same day, if such imports compete with each other and with the domestic like product in the U.S. market. In assessing whether subject imports compete with each other and with the domestic like product, the Commission generally has considered four factors:

- (1) the degree of fungibility between subject imports from different countries and between subject imports and the domestic like product, including consideration of specific customer requirements and other quality related questions;
- (2) the presence of sales or offers to sell in the same geographic markets of subject imports from different countries and the domestic like product;
- (3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and

⁵⁵ 19 U.S.C. §§ 1677(24)(A)(i) and 1677(24)(A)(ii). China and Vietnam, the sources of paper plate imports subject to countervailing duty investigations, are not on USTR's list of developing or least-developed countries and therefore not subject to the 4 percent negligibility limit. *See Designations of Developing Countries and Least-Developed Countries Under the Countervailing Duty Law*, 85 Fed. Reg. 7613 (Feb. 10, 2020).

⁵⁶ CR/PR at Table IV-4. No party argues that the Commission should rely on official import statistics for HTSUS subheading 4823.69.0040, which is a basket category that includes in-scope paper plates and out-of-scope paper merchandise, to assess negligibility.

⁵⁷ Subject import volumes from China and Vietnam are the same with respect to the antidumping and countervailing duty investigations.

(4) whether the subject imports are simultaneously present in the market.⁵⁸

While no single factor is necessarily determinative, and the list of factors is not exclusive, these factors are intended to provide the Commission with a framework for determining whether the subject imports compete with each other and with the domestic like product.⁵⁹ Only a “reasonable overlap” of competition is required.⁶⁰

The APPC argues that the Commission should cumulate subject imports from all three subject countries for its analysis of present material injury by reason of subject imports. It contends that paper plates are a fungible commodity product regardless of source, and that subject imports from all three subject countries and the domestic like product competed in the same geographic markets, shared the same channels of distribution, and were simultaneously present in the U.S. market during the POI.⁶¹ No respondent party raised any argument regarding cumulation.

The statutory threshold for cumulation is satisfied in these investigations because the APPC filed the antidumping and countervailing duty petitions with respect to China, Thailand, and Vietnam on the same day, January 25, 2024. In addition, we find a reasonable overlap of competition among imports from all three subject countries, and between subject imports from each source and the domestic like product, for the reasons discussed below.

Fungibility. The record indicates that there is a substantial degree of fungibility between and among domestically produced paper plates and imports from each subject country. Most responding U.S. producers, importers, and purchasers reported that paper plates from domestic and subject sources were always or frequently interchangeable with each other.⁶²

In addition, majorities of responding purchasers reported that domestically produced paper plates and paper plates from each subject country were comparable with respect to most

⁵⁸ See *Certain Cast-Iron Pipe Fittings from Brazil, the Republic of Korea, and Taiwan*, Inv. Nos. 731-TA-278-280 (Final), USITC Pub. 1845 (May 1986), *aff'd*, *Fundicao Tupy, S.A. v. United States*, 678 F. Supp. 898 (Ct. Int'l Trade), *aff'd*, 859 F.2d 915 (Fed. Cir. 1988).

⁵⁹ See, e.g., *Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int'l Trade 1989).

⁶⁰ The Statement of Administrative Action (SAA) to the Uruguay Round Agreements Act (URAA), expressly states that “the new section will not affect current Commission practice under which the statutory requirement is satisfied if there is a reasonable overlap of competition.” H.R. Rep. No. 103-316, Vol. I at 848 (1994) (*citing Fundicao Tupy, S.A. v. United States*, 678 F. Supp. at 902; *see Goss Graphic Sys., Inc. v. United States*, 33 F. Supp. 2d 1082, 1087 (Ct. Int'l Trade 1998) (“cumulation does not require two products to be highly fungible”); *Wieland Werke, AG*, 718 F. Supp. at 52 (“Completely overlapping markets are not required.”)).

⁶¹ APPC Prehearing Br. at 8-14.

⁶² CR/PR at Tables II-12-14.

of the 15 purchasing factors. Specifically, in comparisons of domestically produced paper plates and subject imports from China, majorities of purchasers reported that they were comparable with respect to 13 factors.⁶³ In the limited number of comparisons of domestically produced paper plates and subject imports from Thailand, majorities of purchasers reported that they were comparable with respect to eight factors,⁶⁴ and in comparisons of domestically produced paper plates and subject imports from Vietnam, majorities of purchasers reported that they were comparable with respect to 11 factors.⁶⁵

Furthermore, domestically produced paper plates and paper plates from each subject country overlapped in terms of paper plate widths, color, and branding type.⁶⁶ Specifically, in 2023, there were substantial U.S. shipments of the domestic like product and paper plates from each subject country in all three width categories (*i.e.*, ≤ 7.5 inches, >7.5 inches to ≤ 9.0 , and >9.0 inches).⁶⁷ In addition, there were substantial U.S. shipments of the domestic like product and paper plates from each subject country that were “special occasion” paper plates and “other colors.”⁶⁸ Finally, there were substantial U.S. shipments of the domestic like product and paper plates from each subject country that were private label paper plates.^{69 70}

⁶³ CR/PR at Table II-11. A majority of purchasers reported that the domestic like product was superior to subject imports from China with respect to delivery time. Regarding price, an equal number of purchasers reported that the domestic like product was inferior or comparable to subject imports from China. *See id.*

⁶⁴ CR/PR at Table II-11. Majorities of purchasers reported that the domestic like product was superior to subject imports from Thailand with respect to delivery time and U.S. transportation costs. Equal numbers of purchasers reported that the domestic like product was superior, comparable, or inferior to subject imports from Thailand with respect to availability, delivery terms, price, and reliability of supply. In addition, equal numbers of purchasers reported that the domestic like product was superior or comparable to subject imports from Thailand with respect to technical support/service. *See id.*

⁶⁵ CR/PR at Table II-11. A plurality of purchasers reported that the domestic like product was superior to subject imports from Vietnam with respect to delivery time. With respect to availability, price, and reliability of supply, equal numbers of purchasers reported that the domestic like product was inferior or comparable to subject imports from Vietnam. *See id.*

⁶⁶ CR/PR at Tables IV-11-13.

⁶⁷ CR/PR at Table IV-11. In 2023, U.S. producers’ shipments of paper plates that were ≤ 7.5 inches accounted for 4.9 percent of their total U.S. shipments, paper plates that were >7.5 inches to ≤ 9.0 inches accounted for 55.9 percent, and paper plates that were >9.0 inches accounted for 39.2 percent. U.S. importers’ U.S. shipments of paper plate imports from China that were ≤ 7.5 inches accounted for *** percent of their total U.S. shipments, paper plate imports that were >7.5 inches to ≤ 9.0 inches accounted for *** percent, and paper plate imports that were >9.0 inches accounted for *** percent. U.S. importers’ U.S. shipments of paper plate imports from Thailand that were ≤ 7.5 inches accounted for *** percent of their total U.S. shipments, paper plates that were >7.5 inches to ≤ 9.0 inches accounted for *** percent, and paper plate imports that were >9.0 inches accounted for *** (Continued...)

Thus, the record indicates that there is a sufficient degree of fungibility between and among subject imports from each country and the domestic like product for purposes of cumulation.

Channels of Distribution. During the POI, responding U.S. producers and importers of paper plates from all three subject countries reporting selling paper plates primarily to retailers.⁷¹ Thus, the record indicates that there is overlap between and among subject imports from all three sources and domestically produced paper plates in sales to the retailer channel of distribution.

Geographic Overlap. Responding U.S. producers reported selling paper plates to all regions in the United States during the POI, as did importers of paper plates from all three

(...Continued)

percent. U.S. importers' U.S. shipments of paper plate imports from Vietnam that were ≤ 7.5 inches accounted for *** percent, paper plate imports that were > 7.5 inches to ≤ 9.0 inches accounted for *** percent, and paper plate imports that were > 9.0 inches accounted for *** percent. *See id.*

⁶⁸ CR/PR at Table IV-12. In 2023, U.S. producers' shipments of paper plates that were "special occasion" accounted for 12.4 percent of their total U.S. shipments and paper plates that were "other color" accounted for 69.9 percent, while paper plates that were "solid white" accounted for 17.8 percent. U.S. importers' U.S. shipments of paper plates from China that were "special occasion" accounted for *** percent of their total U.S. shipments and paper plates that were "other color" accounted for *** percent, while paper plates that were "solid white" accounted for *** percent. U.S. importers' U.S. shipments of paper plates from Thailand that were "special occasion" accounted for *** percent of their total U.S. shipments and paper plates that were "other color" accounted for *** percent. U.S. importers' U.S. shipments of paper plates from Vietnam that were "special occasion" accounted for *** percent of their total U.S. shipments and paper plates that were "other color" accounted for *** percent. *See id.*

⁶⁹ CR/PR at Table IV-13. Private label paper plates are those that are sold under a purchaser's own private brand. *Id.* at II-1. In 2023, U.S. producers' shipments of private label paper plates accounted for *** percent of their total U.S. shipments, while branded paper plates accounted for *** percent. U.S. importers' U.S. shipments of private label paper plate imports from China accounted for *** percent of their total U.S. shipments, while branded paper plate imports accounted for *** percent. U.S. importers' U.S. shipments of private label paper plate imports from Thailand accounted for *** percent of their total U.S. shipments. U.S. importers' U.S. shipments of private label paper plate imports from Vietnam accounted for *** percent of their total U.S. shipments, while branded label paper plate imports accounted for *** percent. *Id.* at Table IV-13.

⁷⁰ Consistent with the APPC's claim that paper plates from subject and domestic sources are produced to the same customer specifications and interchangeably sold under the same private label brands, 16 of 18 responding purchasers reported purchasing paper plates from both domestic and subject sources. APPC Prehearing Br. at 10-11; CR/PR at Table V-15.

⁷¹ CR/PR at Table II-1. U.S. producers and importers of product from all three subject countries reported selling private label paper plates to retailers throughout the POI. U.S. producers and importers of product from China and Vietnam also reported selling branded paper plates to retailers, while importers of product from Thailand did not. *See id.*

subject countries.⁷² Official import statistics also indicate that imports from each subject country entered the United States through all four borders of entry (*i.e.*, East, North, South, and West) in 2023.⁷³

Simultaneous Presence in Market. As reflected by the pricing data, the domestic like product was present in the U.S. market throughout the POI.⁷⁴ Imports from all three subject sources were also present in the U.S. market throughout the POI, including in every month of the 2022-2023 period and interim 2024.⁷⁵

Conclusion. The record indicates that subject imports from China, Thailand, and Vietnam are fungible with the domestic like product and each other. The record also indicates that imports from each of the subject countries and the domestic like product were sold in the same channel of distribution and overlapping geographic markets and were simultaneously present in the U.S. market during the POI. Because the record indicates that there was a reasonable overlap of competition between and among imports from each subject country and domestically produced paper plates, we cumulate subject imports from China, Thailand, Vietnam for our analysis of material injury by reason of subject imports.

VI. Material Injury by Reason of Subject Imports

Based on the record in the final phase of this investigation, we find that an industry in the United States is materially injured by reason of imports of paper plates from China, Thailand, and Vietnam found by Commerce to be sold in the United States at less than fair value and imports of paper plates from China and Vietnam found by Commerce to be subsidized by the governments of China and Vietnam.

A. Legal Standards

In the final phase of antidumping and countervailing duty investigations, the Commission determines whether an industry in the United States is materially injured or threatened with material injury by reason of the imports under investigation.⁷⁶ In making this

⁷² CR/PR at Table II-2.

⁷³ CR/PR at Table IV-14.

⁷⁴ CR/PR at Tables V-4 to V-7.

⁷⁵ CR/PR at Table IV-15. Subject imports from China were reported in all months of the POI. Subject imports from Thailand were reported in 1 out of 12 months in 2021, all 12 months in 2022 and 2023, and all 6 months of interim 2024. Subject imports from Vietnam were reported in all but one month of the POI. *See id.*

⁷⁶ 19 U.S.C. §§ 1671d(b), 1673d(b).

determination, the Commission must consider the volume of subject imports, their effect on prices for the domestic like product, and their impact on domestic producers of the domestic like product, but only in the context of U.S. production operations.⁷⁷ The statute defines “material injury” as “harm which is not inconsequential, immaterial, or unimportant.”⁷⁸ In assessing whether the domestic industry is materially injured by reason of subject imports, we consider all relevant economic factors that bear on the state of the industry in the United States.⁷⁹ No single factor is dispositive, and all relevant factors are considered “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”⁸⁰

Although the statute requires the Commission to determine whether the domestic industry is “materially injured or threatened with material injury by reason of” unfairly traded imports,⁸¹ it does not define the phrase “by reason of,” indicating that this aspect of the injury analysis is left to the Commission’s reasonable exercise of its discretion.⁸² In identifying a causal link, if any, between subject imports and material injury to the domestic industry, the Commission examines the facts of record that relate to the significance of the volume and price effects of the subject imports and any impact of those imports on the condition of the domestic industry. This evaluation under the “by reason of” standard must ensure that subject imports are more than a minimal or tangential cause of injury and that there is a sufficient causal, not merely a temporal, nexus between subject imports and material injury.⁸³

⁷⁷ 19 U.S.C. § 1677(7)(B). The Commission “may consider such other economic factors as are relevant to the determination” but shall “identify each {such} factor ... and explain in full its relevance to the determination.” 19 U.S.C. § 1677(7)(B).

⁷⁸ 19 U.S.C. § 1677(7)(A).

⁷⁹ 19 U.S.C. § 1677(7)(C)(iii).

⁸⁰ 19 U.S.C. § 1677(7)(C)(iii).

⁸¹ 19 U.S.C. §§ 1671d(b), 1673d(b).

⁸² *Angus Chemical Co. v. United States*, 140 F.3d 1478, 1484-85 (Fed. Cir. 1998) (“{T}he statute does not ‘compel the commissioners’ to employ {a particular methodology}.”), *aff’g*, 944 F. Supp. 943, 951 (Ct. Int’l Trade 1996).

⁸³ The Federal Circuit, in addressing the causation standard of the statute, observed that “{a}s long as its effects are not merely incidental, tangential, or trivial, the foreign product sold at less than fair value meets the causation requirement.” *Nippon Steel Corp. v. USITC*, 345 F.3d 1379, 1384 (Fed. Cir. 2003). This was further ratified in *Mittal Steel Point Lisas Ltd. v. United States*, 542 F.3d 867, 873 (Fed. Cir. 2008), where the Federal Circuit, quoting *Gerald Metals, Inc. v. United States*, 132 F.3d 716, 722 (Fed. Cir. 1997), stated that “this court requires evidence in the record ‘to show that the harm occurred ‘by reason of’ the LTFV imports, not by reason of a minimal or tangential contribution to material harm caused by LTFV goods.’” *See also Nippon Steel Corp. v. United States*, 458 F.3d 1345, 1357 (Fed. Cir. 2006); *Taiwan Semiconductor Industry Ass’n v. USITC*, 266 F.3d 1339, 1345 (Fed. Cir. 2001).

In many investigations, there are other economic factors at work, some or all of which may also be having adverse effects on the domestic industry. Such economic factors might include nonsubject imports; changes in technology, demand, or consumer tastes; competition among domestic producers; or management decisions by domestic producers. The legislative history explains that the Commission must examine factors other than subject imports to ensure that it is not attributing injury from other factors to the subject imports, thereby inflating an otherwise tangential cause of injury into one that satisfies the statutory material injury threshold.⁸⁴ In performing its examination, however, the Commission need not isolate the injury caused by other factors from injury caused by unfairly traded imports.⁸⁵ Nor does the “by reason of” standard require that unfairly traded imports be the “principal” cause of injury or contemplate that injury from unfairly traded imports be weighed against other factors, such as nonsubject imports, which may be contributing to overall injury to an industry.⁸⁶ It is

⁸⁴ SAA at 851-52 (“{T}he Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.”); S. Rep. 96-249 at 75 (1979) (the Commission “will consider information which indicates that harm is caused by factors other than less-than-fair-value imports.”); H.R. Rep. 96-317 at 47 (1979) (“in examining the overall injury being experienced by a domestic industry, the ITC will take into account evidence presented to it which demonstrates that the harm attributed by the petitioner to the subsidized or dumped imports is attributable to such other factors;” those factors include “the volume and prices of nonsubsidized imports or imports sold at fair value, contraction in demand or changes in patterns of consumption, trade restrictive practices of and competition between the foreign and domestic producers, developments in technology and the export performance and productivity of the domestic industry”); *accord Mittal Steel*, 542 F.3d at 877.

⁸⁵ SAA at 851-52 (“{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports.”); *Taiwan Semiconductor Industry Ass’n*, 266 F.3d at 1345 (“{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports . . . Rather, the Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.” (emphasis in original)); *Asociacion de Productores de Salmon y Trucha de Chile AG v. United States*, 180 F. Supp. 2d 1360, 1375 (Ct. Int’l Trade 2002) (“{t}he Commission is not required to isolate the effects of subject imports from other factors contributing to injury” or make “bright-line distinctions” between the effects of subject imports and other causes.); *see also Softwood Lumber from Canada*, Inv. Nos. 701-TA-414 and 731-TA-928 (Remand), USITC Pub. 3658 at 100-01 (Dec. 2003) (Commission recognized that “{i}f an alleged other factor is found not to have or threaten to have injurious effects to the domestic industry, *i.e.*, it is not an ‘other causal factor,’ then there is nothing to further examine regarding attribution to injury”), *citing Gerald Metals*, 132 F.3d at 722 (the statute “does not suggest that an importer of LTFV goods can escape countervailing duties by finding some tangential or minor cause unrelated to the LTFV goods that contributed to the harmful effects on domestic market prices.”).

⁸⁶ S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47.

clear that the existence of injury caused by other factors does not compel a negative determination.⁸⁷

Assessment of whether material injury to the domestic industry is “by reason of” subject imports “does not require the Commission to address the causation issue in any particular way” as long as “the injury to the domestic industry can reasonably be attributed to the subject imports.”⁸⁸ The Commission ensures that it has “evidence in the record” to “show that the harm occurred ‘by reason of’ the LTFV imports,” and that it is “not attributing injury from other sources to the subject imports.”⁸⁹ The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed “rigid adherence to a specific formula.”⁹⁰

The question of whether the material injury threshold for subject imports is satisfied notwithstanding any injury from other factors is factual, subject to review under the substantial evidence standard.⁹¹ Congress has delegated this factual finding to the Commission because of the agency’s institutional expertise in resolving injury issues.⁹²

B. Conditions of Competition

The following conditions of competition inform our analysis of whether there is material injury by reason of subject imports.

⁸⁷ See *Nippon Steel Corp.*, 345 F.3d at 1381 (“an affirmative material-injury determination under the statute requires no more than a substantial-factor showing. That is, the ‘dumping’ need not be the sole or principal cause of injury.”).

⁸⁸ *Mittal Steel*, 542 F.3d at 876, 878; see also *id.* at 873 (“While the Commission may not enter an affirmative determination unless it finds that a domestic industry is materially injured ‘by reason of’ subject imports, the Commission is not required to follow a single methodology for making that determination ... {and has} broad discretion with respect to its choice of methodology.”), citing *United States Steel Group v. United States*, 96 F.3d 1352, 1362 (Fed. Cir. 1996) and S. Rep. 96-249 at 75. In its decision in *Swiff-Train v. United States*, 793 F.3d 1355 (Fed. Cir. 2015), the Federal Circuit affirmed the Commission’s causation analysis as comporting with the Court’s guidance in *Mittal*.

⁸⁹ *Mittal Steel*, 542 F.3d at 873 (quoting from *Gerald Metals*, 132 F.3d at 722), 877-79. We note that one relevant “other factor” may involve the presence of significant volumes of price-competitive nonsubject imports in the U.S. market, particularly when a commodity product is at issue. In appropriate cases, the Commission collects information regarding nonsubject imports and producers in nonsubject countries in order to conduct its analysis.

⁹⁰ *Nucor Corp. v. United States*, 414 F.3d 1331, 1336, 1341 (Fed. Cir. 2005); see also *Mittal Steel*, 542 F.3d at 879 (“*Bratsk* did not read into the antidumping statute a Procrustean formula for determining whether a domestic injury was ‘by reason’ of subject imports.”).

⁹¹ We provide in our discussion below a full analysis of other factors alleged to have caused any material injury experienced by the domestic industry.

⁹² *Mittal Steel*, 542 F.3d at 873; *Nippon Steel Corp.*, 458 F.3d at 1350, citing *U.S. Steel Group*, 96 F.3d at 1357; S. Rep. 96-249 at 75 (“The determination of the ITC with respect to causation is ... complex and difficult, and is a matter for the judgment of the ITC.”).

1. Demand

Paper plates are used as tableware for casual dinners, picnics, large formal gatherings or any event where the paper plate is to be discarded after eating.⁹³ The APPC argues that demand for paper plates depends on “various factors, which may in some cases have offsetting effects.”⁹⁴ It claims, for instance, that the COVID-19 pandemic led to increased paper plate usage at home, but likely caused a decline in usage at some restaurants.⁹⁵ According to the APPC, apparent U.S. consumption was “virtually flat” between 2021 to 2023, before increasing in interim 2024.⁹⁶ It anticipates that demand for paper plates will increase further in the future as consumers shift away from plastic and Styrofoam to more sustainable materials.⁹⁷ Consistent with APPC’s experience, most responding U.S. producers reported an increase in U.S. demand for paper plates since January 1, 2021.⁹⁸ However, U.S. importers were split between those reporting that demand had increased or not changed, while most U.S. purchasers reported that demand had decreased.⁹⁹

In addition, most market participants (six of eight U.S. producers, 16 of 26 U.S. importers, and 12 of 18 U.S. purchasers) reported that the U.S. paper plate market is subject to seasonal business cycles, usually based on major holidays.¹⁰⁰ Those U.S. producers, importers, and purchasers reporting seasonal demand and sales trends indicated that demand for paper plates increased in the summer and during the holidays, including Halloween, Thanksgiving, Christmas, Super Bowl, and Valentine’s Day.¹⁰¹

Apparent U.S. consumption by quantity was relatively flat between 2021 and 2023, increasing from *** paper plates in 2021 to *** paper plates in 2022, before decreasing to *** paper plates in 2023.¹⁰² It was higher at *** paper plates in interim 2024, compared with *** paper plates in interim 2023.¹⁰³

⁹³ CR/PR at I-11.

⁹⁴ APPC Prehearing Br. at 16.

⁹⁵ APPC Prehearing Br. at 16.

⁹⁶ APPC Prehearing Br. at 16-17.

⁹⁷ APPC Prehearing Br. at 17.

⁹⁸ CR/PR at Table II-5.

⁹⁹ CR/PR at Table II-5.

¹⁰⁰ CR/PR at II-13.

¹⁰¹ CR/PR at II-13.

¹⁰² CR/PR at Tables IV-10 and C-1.

¹⁰³ CR/PR at Tables IV-16 and C-1.

2. Supply

The domestic industry was the largest supplier to the U.S. market throughout POI, although its share of apparent U.S. consumption declined by *** percentage points between 2021 and 2023, and was *** percentage points lower in interim 2024 compared to interim 2023. The industry's share of apparent U.S. consumption fell from *** percent in 2021 to *** percent in 2022 and *** percent in 2023.¹⁰⁴ Its market share was lower at *** percent in interim 2024, compared with *** percent in interim 2023.¹⁰⁵

The domestic industry has multiple production facilities located in all regions of the United States and the capacity to supply the entirety of apparent U.S. consumption.¹⁰⁶ During the POI, several domestic producers made substantial capital expenditures to expand their practical production capacity over the POI.¹⁰⁷ Collectively, the domestic industry's practical paper plate production capacity increased by 11.9 percent between 2021 and 2023, increasing from 73.4 billion paper plates in 2021 to 77.3 billion paper plates in 2022 and 82.1 billion paper plates in 2023.¹⁰⁸ The industry's practical paper plate production capacity was higher at 41.2 billion paper plates in interim 2024, compared with 40.2 billion paper plates in interim 2023.¹⁰⁹ The domestic industry operated at practical capacity utilization rates ranging between 59.8 and 71.8 percent during the POI.¹¹⁰

Subject imports were the second-largest source of supply to the U.S. market, gaining *** percentage points in market share during the POI. Their share of apparent U.S. consumption increased from *** percent in 2021 to *** percent in 2022 and *** percent in 2023.¹¹¹ Their market share was higher at *** percent in interim 2024, compared with *** percent in interim 2023.¹¹²

¹⁰⁴ CR/PR at Tables IV-16 and C-1.

¹⁰⁵ CR/PR at Tables IV-16 and C-1.

¹⁰⁶ CR/PR at Tables III-1, III-4, and IV-16.

¹⁰⁷ CR/PR at Tables III-4 and VI-5-6.

¹⁰⁸ CR/PR at Tables III-7 and C-1. The increase in practical paper plates capacity was largely driven by *** and Georgia-Pacific, which expanded its Darlington, South Carolina facility in 2023 and opened a new facility in Jackson, Tennessee in the summer of 2024. *See id.* at III-7.

¹⁰⁹ CR/PR at Tables III-5 and C-1.

¹¹⁰ CR/PR at Table III-5. The domestic industry's practical capacity utilization rate was 71.8 percent in 2021, 68.7 percent in 2022, 59.8 percent in 2023, and 64.9 percent in interim 2024, compared with 60.2 percent in interim 2023. *Id.*

¹¹¹ CR/PR at Tables IV-16 and C-1.

¹¹² CR/PR at Tables IV-10 and C-1.

Nonsubject imports were the smallest source of supply to the U.S. market, accounting for *** percent of apparent U.S. consumption throughout the POI.¹¹³

The APPC states that early in the POI, the domestic industry experienced COVID-19 pandemic-related supply constraints and shortages of paperboard, the primary raw material used to produce paper plates. It maintains, however, that these challenges were resolved later in the POI, as evidenced by the smaller number of U.S. producers that reported experiencing such constraints in 2023 and interim 2024.¹¹⁴ All seven responding U.S. producers and 13 of 18 U.S. purchasers reported supply constraints in 2021 and 2022, with U.S. producers reportedly placing customers on allocations and not accepting new customers.¹¹⁵ *** reported that the supply shortages stemmed from constraints in paperboard, while *** indicated that their supply shortages were driven by volatility, disruption, and wage increases.¹¹⁶ In 2023, however, only three U.S. producers and two purchasers continued to report supply constraints, and by interim 2024, only one U.S. producer and one purchaser reported such constraints.¹¹⁷ Meanwhile, most U.S. importers reported no supply constraints during the POI, and those that did described, amongst other things, difficulty obtaining space on ocean carrier ships.¹¹⁸

3. Substitutability and Other Conditions

We find that there is at least a moderate-to-high degree of substitutability between domestically produced paper plates and subject imports.¹¹⁹ Most responding U.S. producers, importers, and purchasers reported that paper plates from domestic sources and each of the subject sources were always or frequently interchangeable.¹²⁰ In addition, as previously discussed, when asked for a country-by-country comparison with respect to 15 factors that influence purchasing decisions, majorities of responding purchasers reported that domestically produced paper plates and paper plates from each subject country were comparable with

¹¹³ CR/PR at Table IV-16. As previously noted, the volume of nonsubject imports may be ***. *See id.* at IV-1 n.4.

¹¹⁴ APPC Prehearing Br. at 19-20.

¹¹⁵ CR/PR at Table II-4, II-8-10. *** noted that their supply constraints persisted only until mid-2022. *See id.* at II-9-10.

¹¹⁶ CR/PR at II-9.

¹¹⁷ CR/PR at Table II-4, II-10. Since January 25, 2024, *** indicated that it had a few items on allocation, and U.S. purchaser *** reported that ***. *Id.* at II-11.

¹¹⁸ CR/PR at II-9-11 and Table II-4.

¹¹⁹ CR/PR at II-15-16.

¹²⁰ CR/PR at Tables II-12-14.

respect to most of the 15 listed purchasing factors.¹²¹ Differences in the product range of paper plates with certain design features available from different country sources, however, may have limited substitutability to some extent during the POI.¹²²

We find that price is an important factor in purchasing decisions for paper plates, along with availability and quality. Indeed, responding purchasers ranked price among the top three factors influencing their purchasing decisions more often than any other factor. Price, along with quality, were the most frequently cited as being the first-most important factor, followed by availability.¹²³ Price was also cited by 12 of 17 purchasers as being very important to their purchasing decisions.¹²⁴ In addition, most domestic producers indicated that differences other than price were never significant in sales of the domestic like product and subject imports from each source; majorities of importers reported that nonprice differences were sometimes or never significant, with the exception of Vietnam, for which more importers reported that nonprice differences were always or frequently significant; and majorities of purchasers reported that nonprice differences were sometimes or never significant, with the exception of Thailand, for which more purchasers reported that nonprice differences were always or frequently significant.¹²⁵

U.S. producers primarily sold paper plates produced-to-order whereas importers primarily sold paper plates from their inventories. Domestic producers reported that *** percent of their commercial shipments were produced-to-order, with lead times averaging *** days. The remaining *** percent of their commercial shipments were from inventories, with lead times averaging *** days.¹²⁶ Responding U.S. importers reported that *** percent of their commercial shipments were from inventories, with lead times averaging *** days. The remaining *** percent of their commercial shipments were produced-to-order, with lead times averaging *** days.¹²⁷

¹²¹ CR/PR at Table II-11.

¹²² CR/PR at II-16.

¹²³ CR/PR at Table II-7.

¹²⁴ CR/PR at Table II-8.

¹²⁵ CR/PR at Tables II-15-17. Importers reported manufacturing capabilities or process, bundling, volume/quantity/capacity, specific printing or stamping, product availability, technical support, responsiveness, and supplier relationships as significant nonprice differences. Purchasers cited product availability, flexibility for changes, lead times, and capability to produce specific designs as significant nonprice differences. *See id.* at II-31.

¹²⁶ CR/PR at II-19.

¹²⁷ CR/PR at II-19.

U.S. producers reported selling a majority of their paper plates in the spot market, while U.S. importers reported selling most of their paper plates through long-term contracts.¹²⁸ U.S. producers' spot sales accounted for *** percent of their commercial U.S. shipments, while long-term contracts accounted for *** percent, annual contracts accounted for *** percent, and short-term contracts accounted for *** percent.¹²⁹ In contrast, U.S. importers' spot sales accounted for only *** percent of their commercial U.S. shipments, while long-term contracts accounted for *** percent, annual contracts accounted for *** percent, and short-term contracts accounted for *** percent.¹³⁰ U.S. producers' and importers' contracts varied, with some contracts fixing price and sometimes quantity, some contracts allowing for price renegotiation, and some contracts indexed to raw material costs.¹³¹

Paperboard is the principal raw material used to produce paper plates.¹³² According to the producer price index ("PPI") for paperboard, paperboard prices increased over 32 percent from January 2021 to November 2022. After November 2022, paperboard prices decreased and then remained stable at approximately 20 percent above prices in January 2021.¹³³ Domestic producers also reported increases in their raw material costs during the POI.¹³⁴ Raw materials accounted for the largest share of the domestic industry's cost of goods sold ("COGS") for paper plates throughout the POI, ranging from 59.4 percent to 61.8 percent during the 2021-2023 period; they accounted for 58.6 percent of the industry's COGS in interim 2024, compared with 59.6 percent in interim 2023.¹³⁵

During the POI, paper plates from China were subject to duties under section 301 of the Trade Act of 1974. Specifically, effective September 24, 2018, paper plates from China became subject to an additional 10 percent *ad valorem* duty under, and on May 10, 2019, the section 301 duty for paper plates was increased to 25 percent.¹³⁶

¹²⁸ CR/PR at Table V-3.

¹²⁹ CR/PR at Table V-3.

¹³⁰ CR/PR at Table V-3.

¹³¹ CR/PR at V-6.

¹³² CR/PR at V-1.

¹³³ CR/PR at V-1.

¹³⁴ CR/PR at Table VI-1. Domestic producers' unit cost of raw materials increased from \$20.26 per 1,000 paper plates in 2021 to \$25.04 per 1,000 paper plates in 2022 and \$26.93 per 1,000 paper plates in 2023; they were lower at \$24.29 per 1,000 paper plates in interim 2024, compared with \$27.14 per 1,000 paper plates in interim 2023. *Id.*

¹³⁵ CR/PR at Table VI-1.

¹³⁶ CR/PR at I-10.

C. Volume of Subject Imports

Section 771(7)(C)(i) of the Tariff Act provides that the “Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States, is significant.”¹³⁷

The volume of cumulated subject imports increased by *** percent between 2021 and 2023, increasing from *** in 2021 to *** paper plates in 2022, before declining to *** paper plates in 2023. Cumulated subject import volume was *** percent higher at *** paper plates in interim 2024, compared with *** paper plates in interim 2023.¹³⁸

Cumulated subject imports as a share of apparent U.S. consumption increased from *** percent in 2021 to *** percent in 2022 and *** percent in 2023, for an overall increase of *** percentage points.¹³⁹ Their market share was *** percentage points higher in interim 2024, at *** percent, compared with interim 2023, at *** percent.¹⁴⁰

Accordingly, we find that volume of cumulated subject imports and the increase in that volume are significant both in absolute terms and relative to consumption in the United States.

D. Price Effects of the Subject Imports

Section 771(7)(C)(ii) of the Tariff Act provides that, in evaluating the price effects of the subject imports, the Commission shall consider whether

(I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and

(II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.¹⁴¹

As previously discussed in section V.B.3, we find that there is at least a moderate-to-high degree of substitutability between cumulated subject imports and the domestic like product, and that price is an important factor in purchasing decisions, along with availability and quality.

¹³⁷ 19 U.S.C. § 1677(7)(C)(i).

¹³⁸ CR/PR at Tables IV-2-3.

¹³⁹ CR/PR at Tables IV-10 and C-1.

¹⁴⁰ CR/PR at Tables IV-10 and C-1.

¹⁴¹ 19 U.S.C. § 1677(7)(C)(ii).

We have examined several sources of data in our underselling analysis, including pricing data, import purchase cost data, and information concerning lost sales. With respect to pricing data, the Commission collected quarterly quantity and f.o.b. value data on sales of four pricing products shipped by U.S. producers and importers to unrelated U.S. customers during the POI.¹⁴² Eight U.S. producers and two importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.¹⁴³ The pricing data reported by these firms accounted for approximately 17.7 percent of U.S. producers' U.S. commercial shipments of domestically produced paper plates, 2.0 percent of U.S. commercial shipments of subject imports from China, 26.8 percent of U.S. commercial shipments of subject imports from Thailand, and 21.3 percent of U.S. commercial shipments of subject imports from Vietnam in 2023.¹⁴⁴

The pricing data show that cumulated subject imports undersold the domestic like product in 23 of 35 quarterly comparisons, or 65.7 percent of the time, with underselling margins ranging from 0.1 percent to 24.3 percent, and averaging 8.8 percent.¹⁴⁵ Cumulated subject imports oversold the domestic like product in the remaining 12 quarterly comparisons, or 34.3 percent of the time, with overselling margins ranging from 0.6 percent to 42.9 percent, and averaging 11.2 percent.¹⁴⁶ Quarters in which there was underselling accounted for 79.0 percent of total reported cumulated subject import sales volume (340.1 million paper plates) covered by the Commission's pricing data during the POI, and quarters in which there was overselling accounted for 21.0 percent of total reported cumulated subject import sales volume (90.6 million paper plates).¹⁴⁷

The pricing data show that as the volume and market share of cumulated subject imports increased over the POI, the number of quarterly comparisons in which cumulated

¹⁴² CR/PR at V-8. The four pricing products are: (1) Product 1 – 8.375”-9.0” round uncoated white paper plates, 0.010-0.012 inch caliper, 90-120 count per package, in shrink wrap and/or bags for individual sale; (2) Product 2 – 8.375” – 8.75” round coated and printed paper plates, 0.013-0.016 inch caliper, printed with 35 percent or less ink coverage, 90-120 count per package, packaged in shrink wrap and/or bags for individual sale; (3) Product 3 – 10.0” – 10.25” round coated and printed paper plates, 0.018-0.022 inch caliper, printed with 35 percent or less ink coverage, 43-50 count per package, packaged in shrink wrap and/or bags for individual sale; and (4) Product 4 – 7.0” round solid (non-metallic) color paper plates, 0.012-0.015 inch caliper, 24 count per package, packaged in shrink wrap and/or bags for individual sale. *Id.*

¹⁴³ CR/PR at V-8.

¹⁴⁴ CR/PR at V-8.

¹⁴⁵ CR/PR at Table V-10.

¹⁴⁶ CR/PR at Table V-10.

¹⁴⁷ CR/PR at Table V-10.

subject imports undersold the domestic like product also increased. Specifically, the pricing data show that the percentage of quarterly comparisons involving underselling increased from *** percent in 2021 to *** percent in interim 2024.¹⁴⁸ The volume of reported cumulated subject import sales in quarterly comparisons in which there was underselling increased from *** paper plates in 2021 to *** paper plates in interim 2024.¹⁴⁹

The Commission also collected import purchase cost data for the same four pricing products from firms that imported these products from subject sources for retail sale.¹⁵⁰ Purchase cost data was reported by one firm, ***, and accounted for *** percent of subject imports from China in 2023.¹⁵¹ The import purchase cost data show that the landed duty-paid (“LDP”) costs for subject imports were higher than the sales price for the domestic like product in all eight quarterly comparisons, at price-cost differentials ranging from 6.9 percent to 34.0 percent, and averaging 21.3 percent.¹⁵² There were *** paper plates from China in the quarters where subject imports had higher LDP costs than the sales prices of the domestic product.¹⁵³

We recognize that the import purchase cost data may not reflect the total cost of importing and therefore requested that importers for retail sale provide additional information regarding the costs and benefits of directly importing paper plates. The one importer providing import purchase cost data, ***, reported that it incurred additional costs of *** beyond the LDP costs associated with importing paper plates.¹⁵⁴

Although the purchase cost data show that the subject imports’ purchase costs were *** higher than sales prices for the domestic like product, we note that *** reported in its questionnaire response that it saved an estimated *** percent of the purchaser price by importing paper plates rather than purchasing from a U.S. producer.¹⁵⁵ Consistent with these reported savings, *** also reported purchasing subject imports instead of the domestic like

¹⁴⁸ CR/PR at Table V-12. Cumulated subject imports undersold the domestic like product in *** of *** quarterly comparisons in 2021, *** of *** quarterly comparisons in 2022, *** of *** quarterly comparisons in 2023, and *** of *** quarterly comparisons in interim 2023. *See id.*

¹⁴⁹ CR/PR at Table V-12.

¹⁵⁰ CR/PR at V-18-19 and Table V-8.

¹⁵¹ CR/PR at V-18.

¹⁵² CR/PR at Table V-14.

¹⁵³ CR/PR at Table V-13.

¹⁵⁴ CR/PR at V-18.

¹⁵⁵ CR/PR at V-19. *** also estimated that it saved *** percent of the purchase price by importing paper plates rather than purchasing from a U.S. importer. *Id.*

product during the POI and indicated that subject import prices were lower than those of the domestic like product.¹⁵⁶

We have also considered lost sales information. Of the 18 responding purchasers, 14 purchasers reported that, since 2021, they had purchased subject imports instead of domestically produced paper plates, and 11 of these responding purchasers reported that subject import prices were lower than U.S. prices.¹⁵⁷ Moreover, three of those purchasers also reported that price was a primary reason for their decision to purchase subject imports rather than the domestic like product, and two estimated that they purchased *** subject paper plates instead of domestically produced paper plates due to price.¹⁵⁸ The volume of confirmed lost sales was equivalent to *** of purchasers' total reported purchases and imports of subject imports during the POI.

Based on the at least moderate-to-high degree of substitutability between domestically produced paper plates and subject imports, the importance of price in purchasing decisions, the predominant subject import underselling, and other information reviewed above that subject imports are lower priced than the domestic like product, we find that cumulated subject imports undersold the domestic like product to a significant degree during the POI. The underselling contributed to cumulated subject imports gaining *** percentage points in market share between 2021 and 2023, and an additional *** percentage points in market share in interim 2024 compared to interim 2023, at the domestic industry's expense.¹⁵⁹

We have also examined price trends during the POI. Between January 2021 and June 2024, the domestic industry's sales prices for paper plates generally increased overall. The industry's sales price increases ranged from 12.4 percent to 48.2 percent, depending on the product.¹⁶⁰ Due to the lack of quarterly pricing and purchase cost data of subject imports across the entire POI, there are no price or purchase cost trends for cumulated subject imports available on the record of the final phase of these investigations.¹⁶¹

We have also considered whether cumulated subject imports prevented price increases for domestically produced paper plates which otherwise would have occurred

¹⁵⁶ CR/PR at Table V-16.

¹⁵⁷ CR/PR at Table V-16.

¹⁵⁸ CR/PR at Tables V-16-17.

¹⁵⁹ CR/PR at Tables IV-16 and C-1. Responding purchasers also reported that purchases of subject imports increased as a share of their total purchases by *** percentage points from January 2021 to June 2024 while purchases of the domestic like product declined as a share of their total purchases by *** percentage points. CR/PR at Table V-15.

¹⁶⁰ CR/PR at Table V-9.

¹⁶¹ CR/PR at Table V-9. ***. CR/PR at V-21.

to a significant degree. The domestic industry's ratio of COGS to net sales increased by 1.3 percentage points between 2021 and 2023, decreasing from 77.8 percent in 2021 to 77.4 percent in 2022, before increasing to 79.0 percent in 2023.¹⁶² The domestic industry's ratio of COGS to net sales was lower at 75.4 percent in interim 2024, compared with 80.1 percent in interim 2023.¹⁶³

The increase in domestic industry's COGS to net sales ratio from 2021 to 2023 occurred as increases to the industry's unit COGS outpaced increases to the average unit value ("AUV") of its net sales.¹⁶⁴ Between 2021 and 2023, the domestic industry's COGS per 1,000 paper plates increased by \$12.03, or 36.1, percent,¹⁶⁵ driven by increases in raw material costs of \$6.67, or 32.9 percent, per 1,000 paper plates¹⁶⁶ and other factory costs of \$5.18, or 53.9 percent, per 1,000 paper plates, both of which accounted for substantial portions of the industry's COGS.¹⁶⁷ ¹⁶⁸ Direct labor costs, which accounted for the smallest portion of COGS, also experienced increases of \$0.18, or 5.3 percent, per 1,000 paper plates.¹⁶⁹ ¹⁷⁰ At the same time, the domestic industry's net sales AUV increased by \$14.54, or 34.0 percent, per 1,000 paper plates.¹⁷¹

The domestic industry's COGS to net sales ratio was lower in interim 2024 compared to interim 2023, however, as declines in the industry's unit COGS outpaced declines in its net sales AUV.¹⁷² Specifically, in interim 2024 compared to interim 2023, the domestic industry's COGS per 1,000 paper plates was lower by \$4.10, or 9.0 percent, while its net sales value per 1,000

¹⁶² CR/PR at Tables VI-1 and C-1.

¹⁶³ CR/PR at Tables VI-1 and C-1.

¹⁶⁴ CR/PR at Table VI-2.

¹⁶⁵ CR/PR at Tables VI-1 and VI-2. The domestic industry's COGS per 1,000 paper plates increased from \$33.28 in 2021 to \$40.50 in 2022 and \$45.31 in 2023. CR/PR at Table VI-1.

¹⁶⁶ CR/PR at Tables VI-1 and VI-2. The domestic industry's raw material costs per 1,000 paper plates increased from \$20.26 in 2021 to \$25.04 in 2022 and \$26.93 in 2023. CR/PR at Table VI-1.

¹⁶⁷ CR/PR at Tables VI-1 and VI-2. The domestic industry's other factory costs per 1,000 paper plates increased from \$9.61 in 2021 to \$11.62 in 2022 and \$14.78 in 2023. CR/PR at Table VI-1. ***. CR/PR at VI-20.

¹⁶⁸ Raw material costs comprised the largest portion of COGS in 2023, at 59.4 percent, followed by other factory costs, which accounted for 32.6 percent. CR/PR at Table VI-1.

¹⁶⁹ CR/PR at Tables VI-1 and VI-2. The domestic industry's direct labor costs per 1,000 paper plates increased from \$3.41 in 2021 to \$3.85 in 2022 and \$3.60 in 2023. CR/PR at Table VI-1.

¹⁷⁰ Direct labor costs accounted for 7.9 percent of COGS in 2023. CR/PR at Table VI-1.

¹⁷¹ CR/PR at Tables VI-1 and VI-2. The domestic industry's net sales AUV per 1,000 paper plates increased from \$42.80 in 2021 to \$52.34 in 2022 and \$57.34 in 2023. CR/PR at Table VI-1.

¹⁷² CR/PR at Table VI-2.

paper plates was lower by only \$1.91, or 3.4 percent.¹⁷³ Raw material costs per 1,000 paper plates were lower by \$2.85, or 10.5 percent; direct labor costs per 1,000 paper plates were higher by \$0.19, or 5.1 percent; and other factory costs per 1,000 paper plates were lower by \$1.44, or 9.8 percent.¹⁷⁴

In sum, we find that cumulated subject imports significantly undersold the domestic like product, causing the domestic industry to lose market share to subject imports. We accordingly find that the cumulated subject imports had significant price effects.

E. Impact of the Subject Imports¹⁷⁵

Section 771(7)(C)(iii) of the Tariff Act provides that examining the impact of subject imports, the Commission “shall evaluate all relevant economic factors which have a bearing on the state of the industry.”¹⁷⁶ These factors include output, sales, inventories, capacity utilization, market share, employment, wages, productivity, gross profits, net profits, operating profits, cash flow, return on investment, return on capital, ability to raise capital, ability to service debts, research and development (“R&D”), and factors affecting domestic prices. No

¹⁷³ CR/PR at Table VI-2.

¹⁷⁴ CR/PR at Table VI-2.

¹⁷⁵ The statute instructs the Commission to consider the “magnitude of the dumping margin” in an antidumping proceeding as part of its consideration of the impact of imports. 19 U.S.C. § 1677(7)(C)(iii)(V). In its final determinations of sales at less value on imports from China, Thailand, and Vietnam, Commerce found antidumping duty margins ranging from 267.63 percent to 515.40 percent for imports from China, from 5.57 percent to 73.17 percent for imports from Thailand, and from 30.42 percent and 165.27 percent for imports from Taiwan. *Certain Paper Plates from the People’s Republic of China: Final Affirmative Determination of Sales at Less than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 90 Fed. Reg. at 8272; *Certain Paper Plates from Thailand: Final Affirmative Determination of Sales at Less than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 90 Fed. Reg. at 8262; and *Certain Paper Plates from the Socialist Republic of Vietnam: Final Affirmative Determination of Sales at Less than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 90 Fed. Reg. at 8266. We take into account in our analysis the fact that Commerce has made final findings that all subject producers in China, Thailand, and Taiwan are selling subject imports in the United States at less than fair value. Further, our analysis of the significant underselling of subject imports, described in both the price effects discussion and below, is particularly probative to an assessment of the impact of the subject imports.

¹⁷⁶ 19 U.S.C. § 1677(7)(C)(iii); see also SAA at 851 and 885 (“In material injury determinations, the Commission considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they also may demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.”).

single factor is dispositive and all relevant factors are considered “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”¹⁷⁷

Although the domestic industry’s financial performance generally improved between 2021 and 2023 as its net sales AUVs increased, the domestic industry’s production, U.S. shipments, and net sales quantity declined as subject imports increased and gained *** percentage points in market share at the direct expense of the domestic industry. These trade-related indicators improved in interim 2024 compared to interim 2023, but the increases in the domestic industry’s production, U.S. shipments, and net sales lagged behind the *** percent increase in apparent U.S. consumption between the interim periods, and the industry lost *** percentage points in market share to subject imports.

Most of the domestic industry’s trade-related indicators declined between 2021 and 2023, but improved in interim 2024, compared with interim 2023. The domestic industry’s production capacity increased from 73.4 billion paper plates in 2021 to 77.2 billion paper plates in 2022 and 82.1 billion paper plates in 2023; it was higher at 41.1 billion paper plates in interim 2024, compared with 40.2 billion paper plates in interim 2023.¹⁷⁸ The industry’s production increased from 52.7 billion paper plates to 53.1 billion paper plates, before decreasing to 49.0 billion paper plates, a level 6.9 percent lower than in 2021; it was higher at 26.7 billion paper plates in interim 2024, compared with 24.2 billion paper plates in interim 2023.¹⁷⁹ The industry’s capacity utilization rate decreased 71.8 percent in 2021 to 68.7 percent in 2022 and 59.8 percent in 2023; it was higher at 64.9 percent in interim 2024, compared with 60.2 percent in interim 2023.¹⁸⁰

The domestic industry’s employment-related indicators generally declined from 2021 to 2023, and improved in interim 2024, compared with interim 2023. Its number of production-related workers (“PRWs”) increased from 4,887 PRWs to 5,146 PRWs, before declining to 4,804 PRWs; it was higher at 4,964 PRWs in interim 2024, compared with 4,832 PRWs in interim 2023.¹⁸¹ Total hours worked increased from 11.2 million hours in 2021 to 11.7 million hours in 2022, before declining to 10.9 million hours in 2023; they were higher at 5.6 million hours in interim 2024, compared with 5.4 million hours in interim 2023.¹⁸² Total wages paid increased

¹⁷⁷ 19 U.S.C. § 1677(7)(C)(iii).

¹⁷⁸ CR/PR at Tables III-7 and C-1.

¹⁷⁹ CR/PR at Tables III-7 and C-1.

¹⁸⁰ CR/PR at Tables III-7 and C-1.

¹⁸¹ CP/PR at Tables III-14 and C-1.

¹⁸² CP/PR at Tables III-14 and C-1.

from \$226.8 million in 2021 to \$255.6 million in 2022, before decreasing to \$242.9 million in 2023; they were higher at \$128.6 million in interim 2024, compared with \$119.3 million in interim 2023.¹⁸³ Hourly wages increased from \$20.26 in 2021 to \$21.79 in 2022 and \$22.19 in 2023; they were higher at \$22.81 in interim 2024, compared with \$22.23 in interim 2023.¹⁸⁴ Productivity as measured in units per hour decreased from 4,704 paper plates in 2021 to 4,529 paper plates in 2022 and 4,480 paper plates in 2023; it was higher at 4,740 paper plates in interim 2024, compared with 4,511 paper plates in interim 2023.¹⁸⁵

The domestic industry's U.S. shipments decreased from 52.5 billion paper plates in 2021 to 50.7 billion paper plates in 2022 and 50.1 billion paper plates in 2023, a level 4.6 percent lower than in 2021; it was higher at 26.2 billion paper plates in interim 2024, compared with 25.0 billion paper plates in interim 2023.¹⁸⁶ While apparent U.S. consumption remained stable from 2021 to 2023, the domestic industry's U.S. shipments declined, causing the domestic industry's share of apparent U.S. consumption to decline from *** percent in 2021 to *** percent in 2022 and *** percent in 2023.¹⁸⁷ Although apparent U.S. consumption was higher in interim 2024 compared to interim 2023, the domestic industry's U.S. shipments did not rise to the same extent, and as a result, the domestic industry's share of apparent U.S. consumption was lower at *** percent in interim 2024, compared with *** percent in interim 2023.¹⁸⁸

The domestic industry's end-of-period inventories increased irregularly by 27.0 percent from 2021 to 2023, increasing from 3.7 billion paper plates in 2021 to 6.0 billion paper plates in 2022, before decreasing to 4.7 billion paper plates; they were roughly the same at 5.1 billion paper plates in interim 2023 and interim 2024.¹⁸⁹ As a ratio of total shipments, the domestic industry's end-of-period inventories increased from 7.1 percent in 2021 to 11.7 percent in 2022, before decreasing to 9.4 percent in 2023; they were lower at 9.7 percent in interim 2024, compared with 10.1 percent in interim 2023.¹⁹⁰

Most of the domestic industry's financial performance indicators improved over the full years of the POI, and were stronger in interim 2024 compared with interim 2023. The domestic industry's net sales revenue increased by 27.9 percent from 2021 to 2023, from \$2.3 billion in

¹⁸³ CP/PR at Tables III-14 and C-1.

¹⁸⁴ CP/PR at Tables III-14 and C-1.

¹⁸⁵ CP/PR at Tables III-14 and C-1.

¹⁸⁶ CR/PR at Tables III-9 and C-1.

¹⁸⁷ CR/PR at Tables IV-16 and C-1.

¹⁸⁸ CR/PR at Tables IV-16 and C-1.

¹⁸⁹ CR/PR at Tables III-10 and C-1.

¹⁹⁰ CR/PR at Table III-10.

2021 to \$2.7 billion in 2022, and \$2.9 billion in 2023; it was roughly the same at \$1.4 billion in interim 2023 and interim 2024.¹⁹¹ The domestic industry's gross profits increased from \$501.3 million in 2021 to \$602.4 million in 2022 and \$604.7 million in 2023; it was higher at \$355.7 million in interim 2024, compared with \$283.6 million in interim 2023.¹⁹² The domestic industry's operating income increased from \$354.1 million in 2021 to \$441.0 million in 2022, before decreasing to \$416.4 million in 2023; it was higher at \$259.9 million in interim 2024, compared with \$190.1 million in interim 2023.¹⁹³ Its net income similarly increased from \$*** in 2021 to \$*** in 2022, before decreasing to \$*** in 2023; it was higher at \$*** in interim 2024, compared with \$*** in interim 2023.¹⁹⁴ Its operating and net income margins both declined irregularly from 2021 to 2023, but were higher in interim 2024, compared with interim 2023.¹⁹⁵

The domestic industry's capital expenditures increased from \$*** in 2021 to \$*** in 2022 and \$*** in 2023; they were lower at \$*** in interim 2024, compared with \$*** in interim 2023.¹⁹⁶ The domestic industry's research and development expenses declined from \$*** in 2021 to \$*** in 2022 and \$*** in 2023; they were higher at \$*** in interim 2024, compared with \$*** in interim 2023.¹⁹⁷ The domestic industry's return on assets improved from *** percent in 2021 to *** percent in 2022, before declining to *** percent in 2023.¹⁹⁸ The domestic industry also reported negative effects on investment and on growth and development due to subject imports.¹⁹⁹

From 2021 to 2023, significant and increasing volumes of low-priced cumulated subject imports captured *** percentage points of market share from the domestic industry.²⁰⁰ As the domestic industry lost market share to subject imports during a period of stable demand, the

¹⁹¹ CR/PR at Tables VI-1 and C-1.

¹⁹² CR/PR at Tables VI-1 and C-1.

¹⁹³ CR/PR at Tables VI-1 and C-1.

¹⁹⁴ CR/PR at Tables VI-1 and C-1.

¹⁹⁵ CR/PR at Tables VI-1 and C-1. The domestic industry's operating income margin increased from 15.7 percent in 2021 to 16.6 percent in 2022, before decreasing to 14.5 percent in 2023; it was higher at 18.0 percent in interim 2024, compared with 13.3 percent in interim 2023. Its net income margin increased from *** percent in 2021 to *** percent in 2022, before decreasing to *** percent in 2023; it was higher at *** percent in interim 2024, compared with *** percent in interim 2023. *See id.*

¹⁹⁶ CR/PR at Tables VI-5 and C-1.

¹⁹⁷ CR/PR at Tables VI-7 and C-1.

¹⁹⁸ CR/PR at Table VI-10.

¹⁹⁹ CR/PR at Table VI-12.

²⁰⁰ CR/PR at Tables IV-16 and C-1.

industry's production declined by 6.9 percent and its U.S. shipments declined by 4.6 percent.²⁰¹ Although the domestic industry experienced supply constraints in 2021 and 2022, the record shows that the domestic industry's practical capacity utilization rate declined from 71.8 percent in 2021 to 68.7 percent in 2022 and domestic producers reported an increasing volume of end-of-period inventories.²⁰² Even after the resolution of most of the domestic industry's supply constraints in 2023, subject imports did not retreat from the U.S. market, but rather proceeded to increase and capture additional market share from the domestic industry. Moreover, while the domestic industry's performance improved in interim 2024 compared with interim 2023, as apparent U.S. consumption increased by *** percent, the industry was unable to fully benefit from the increase in apparent U.S. consumption as increasing volumes of low-priced cumulated subject imports continued to take sales and an additional *** percentage points of market share from the domestic industry.²⁰³ As the domestic industry lost market share to cumulated subject imports during the POI, the industry's production, capacity utilization, employment, U.S. shipments, sales, market share, and profits were lower than they otherwise would have been.

Some purchasers and importers indicated that certain colors, sizes, or shapes/designs are only available from certain country sources.²⁰⁴ However, most purchasers reported that the domestic like product and paper plates from each subject country were comparable with respect to product range.²⁰⁵ Consistent with this, the record indicates that domestically produced paper plates and subject imports were sold in overlapping widths and colors, and were sold both as branded paper plates and private label paper plates, customized to the specifications of specific purchasers.²⁰⁶

We have also considered whether there are other factors that may have had an adverse impact on the domestic industry during the POI to ensure that we are not attributing injury from such other factors to subject imports. As discussed above, nonsubject imports maintained

²⁰¹ CR/PR at Tables IV-6 and C-1.

²⁰² Practical paper capacity is the level of production of paper plates that a domestic producer could reasonably have expected to attain, accounting for existing labor force and availability of material inputs. See U.S. Producer Questionnaire Response at II-3a.

²⁰³ We note that the petitions were filed on January 25, 2024, at the beginning of the interim 2024 period. CR/PR at Table I-1.

²⁰⁴ CR/PR at II-17, II-29. For instance, *** stated that some U.S. suppliers ***; four purchasers indicated that some grades are only available from a single source; *** reported that design features such as shine, holographic prints, and shaped plates are not available from domestic sources; and *** stated that stamping and die cut products are not available from domestic sources. See *id.*

²⁰⁵ CR/PR at Table II-11.

²⁰⁶ CR/PR at Tables IV-11-13.

a very small presence in the U.S. market during the POI and accordingly cannot explain the shift in market share from the domestic industry to subject imports during the POI.²⁰⁷

For the reasons discussed above, we find that cumulated subject imports had a significant impact on the domestic industry.

VII. Critical Circumstances

A. Legal Standards

On January 28, 2025, Commerce issued its final determinations in its antidumping and countervailing duty investigations of paper plates from China, Thailand, and Vietnam.²⁰⁸ In its final antidumping duty determination on subject imports from China, Commerce found that critical circumstances exist for paper plates from non-selected companies eligible for a separate rate, the China-wide entity, and Fuzhou Hengli Paper Co., Ltd. (“Fuzhou Hengli”) and its unaffiliated producers.²⁰⁹ In its final countervailing duty determination on subject imports from China, Commerce found that critical circumstances exist for paper plates from Fuzhou Hengli, non-responsive companies, and all other producers/exporters.²¹⁰ In its final antidumping duty determination on subject imports from Thailand, Commerce found that critical circumstances

²⁰⁷ CR/PR at Tables IV-16 and C-1. Although the volume of nonsubject imports may be ***, *id.* at IV-1 n.4, the record contains no evidence indicating that nonsubject imports were present in the U.S. market in any significant volumes during the POI.

²⁰⁸ *Certain Paper Plates from the People’s Republic of China: Final Affirmative Determination of Sales at Less than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 90 Fed. Reg. 8271; *Certain Paper Plates from the People’s Republic of China: Final Affirmative Countervailing Duty Determination and Final Affirmative Determination of Critical Circumstances, in Part*, 90 Fed. Reg. 8281; *Certain Paper Plates from Thailand: Final Affirmative Determination of Sales at Less than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 90 Fed. Reg. 8262; *Certain Paper Plates from the Socialist Republic of Vietnam: Final Affirmative Determination of Sales at Less than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 90 Fed. Reg. 8265; and *Certain Paper Plates from the Socialist Republic of Vietnam: Final Affirmative Countervailing Duty Determination and Final Affirmative Determination of Critical Circumstances, in Part*, 90 Fed. Reg. 8258.

²⁰⁹ *Certain Paper Plates from the People’s Republic of China: Final Affirmative Determination of Sales at Less than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 90 Fed. Reg. 8271. In addition, Commerce determined that critical circumstances do not exist with respect to dumped paper plates from Jinhua. *See id.*

²¹⁰ *Certain Paper Plates from the People’s Republic of China: Final Affirmative Countervailing Duty Determination and Final Affirmative Determination of Critical Circumstances, in Part*, 90 Fed. Reg. 8281. In addition, Commerce determined that critical circumstances do not exist with respect to subsidized paper plates from Jinhua. *See id.*

exist for paper plates from the seven non-responsive companies, including ABC Digital Technology Co Ltd; Beeconconscious Co; Dester Co; Pimplapas Printing Co., Ltd; Sincerely Cargo, Thai Coconut Co Ltd, and Thai Union Manufacturing Co., Ltd.²¹¹ In its final antidumping duty determination on subject imports from Vietnam, Commerce found that critical circumstances exist for paper plates from the Vietnam-wide entity.²¹² In its final countervailing duty determinations on subject imports from Vietnam, Commerce found that critical circumstances exist for paper plates from Xie Li Vietnam International Company Limited, non-responsive companies (Innovative Sonic Vietnam International, Ningbo Changya Plastic Vietnam Company, Ningbo Changya Plastic Vietnam, and SCG Vietnam), and all other producers and exporters.²¹³ ²¹⁴ Because we have determined that the domestic industry is materially injured by reason of subject imports from China, Thailand, and Vietnam, 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.”²¹⁵

The 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."²¹⁶ The legislative history for the critical circumstances provision indicates that the provision was designed "to deter exporters whose

²¹¹ *Certain Paper Plates from Thailand: Final Affirmative Determination of Sales at Less than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 90 Fed. Reg. 8262. In addition, Commerce determined that critical circumstances do not exist with respect to dumped paper plates from Thai Paper, the three responsive companies (Nirvana Foods & Commerce International Co., Ltd.; Pandora Production Co; and SNC Cup Co., Ltd.), and all other producers/exporters. *See id.*

²¹² *Certain Paper Plates from the Socialist Republic of Vietnam: Final Affirmative Determination of Sales at Less than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 90 Fed. Reg. 8265. In addition, Commerce determined that critical circumstances do not exist with respect to dumped paper plates from Go-Pak Paper Products Vietnam Co., Ltd. (“Go-Pak”). *See id.*

²¹³ *Certain Paper Plates from the Socialist Republic of Vietnam: Final Affirmative Countervailing Duty Determination and Final Affirmative Determination of Critical Circumstances, in Part*, 90 Fed. Reg. 8258. In addition, Commerce determined that critical circumstances do not exist with respect to subsidized paper plates from Go-Pak. *See id.*

²¹⁴ The volumes of dumped and subsidized subject imports from China and dumped and subsidized subject imports from Vietnam for which Commerce made affirmative critical circumstances determinations are the same.

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

²¹⁶ SAA at 877.

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}."²¹⁷ An affirmative critical circumstances determination by the Commission, in conjunction with an affirmative determination of material injury by reason of subject imports, 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.²¹⁸

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.²¹⁹

In considering the timing and volume of subject imports, the Commission's practice is to consider import quantities prior to the filing of the petitions with those subsequent to the filing of the petitions using monthly statistics on the record regarding those firms for which Commerce has made an affirmative critical circumstances determination.²²⁰

B. Party Arguments

Petitioner's Arguments. The APPC argues that the Commission should make affirmative critical circumstances determinations with respect to paper plates from China, Thailand, and Vietnam subject to Commerce's affirmative critical circumstances findings.²²¹ According to the APPC, post-petition imports from each country represented a deliberate effort to enter paper plates into the U.S. market in substantial and increasing volumes before the imposition of provisional measures.²²²

²¹⁷ *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).

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

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

²²⁰ 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).

²²¹ APPC Prehearing Br. at 39-48; APPC Posthearing Br. at 6; APPC Final Comments at 2.

²²² APPC Prehearing Br. at 39-48; APPC Posthearing Br. at 6-15; APPC Final Comments at 2.

The APPC maintains that, contrary to certain respondents' claims, seasonality fails to explain the increases in subject imports in the post-petition period. It emphasizes that although seasonal increases in demand occur in the summer, including June which falls within the post-petition period, demand also increases during Halloween, Thanksgiving, and Christmas, major winter holidays that fall within the pre-petition period. It additionally points to import data from the prior years, which it claims show declining volumes of subject imports from China in the corresponding five-month February-June 2023 period compared with subject imports in the five-month September 2022-January 2023 period. There were, according to the APPC, only small increases in the volume of subject imports from Vietnam between these two periods and in the volume of subject imports from Thailand between the six-month August 2022-January 2023 period and February 2023-July 2023 periods.²²³

The APPC additionally claims that the increased volumes of subject imports from China and Vietnam resulted in increased inventories in the post-petition period, creating a stockpile of imports prior to imposition of such measures that would undermine seriously the remedial effects of the orders.²²⁴ Regarding the *** monthly inventories of subject imports from Thailand reported by ***, the APPC maintains that ***.²²⁵ According to the APPC, other factors such as subject import underselling of the domestic like product and price depressing and suppressing effects in interim 2024 also support affirmative critical circumstances determinations.^{226 227}

Respondents' Arguments. Respondents argue that the record does not support affirmative critical circumstances findings for paper plates from China and Vietnam subject to Commerce's affirmative critical circumstances findings.²²⁸ With respect to imports from China

²²³ APPC Posthearing Br. at 13-14; APPC Final Comments at 2-3.

²²⁴ APPC Prehearing Br. at 39-48; APPC Posthearing Br. at 6-15.

²²⁵ APPC Final Comments at 3.

²²⁶ APPC Posthearing Br. at 6-15.

²²⁷ The APPC identified certain errors in the Commission's tabulation of paper plate imports from Thailand subject to Commerce's affirmative critical circumstances finding in the prehearing report, which Staff corrected in the final report. APPC Posthearing Br. at 9.

²²⁸ Target Prehearing Br. & Posthearing Br. (addressing imports from China and Vietnam subject to Commerce's final affirmative critical circumstances determinations); Acadian Prehearing Br. & Posthearing Br. (addressing critical circumstances with respect to only Chinese imports Jinhua P&P Product Co., Ltd. ("Jinhua")); Cannon Group Prehearing Br. (addressing imports from Vietnam subject to Commerce's final affirmative critical circumstances determinations); and Hallmark Posthearing Br. (addressing imports from China and Vietnam subject to Commerce's final affirmative critical circumstances determinations). No respondent party has argued against finding critical circumstances regarding subject imports from Thailand.

subject to Commerce’s final affirmative critical circumstances determinations, Target, Hallmark, and Sophistiplate contend that the Commission should consider the seasonality in demand for paper plates, and find that the timing and volume of subject imports do not support an affirmative critical circumstances finding.²²⁹ They claim that, in any event, the percentile increase in subject imports in the post-petition period does not constitute the type of “massive surge” that the Commission has previously found sufficient to undermine the remedial effect of an order.²³⁰ They further argue that the increase in U.S. importers’ inventory levels in the post-petition period was equivalent to a *** percent of apparent U.S. consumption in interim 2024, and that such *** inventory levels could not seriously undermine the effectiveness of the order.^{231 232}

With respect to imports from Vietnam subject to Commerce’s final affirmative critical circumstances determinations, Target, Cannon Group, and Hallmark contend that the increase in such imports in the post-petition period was not significant because the volume of the increase was equivalent to only *** percent of apparent U.S. consumption in interim 2024.²³³ Observing that the market share of subject imports from Vietnam was consistently *** over the POI, they argue that the *** increase in market share in interim 2024 compared to interim 2023, would not undermine the remedial effect of the orders.²³⁴ In addition, they note that the

²²⁹ Target Prehearing Br. at 11; Target Posthearing Br. at 3-4; Hallmark Posthearing Br. at 5. Specifically, Target maintains that subject imports *** following the filing of the petitions, and that much of the increase in subject imports in the post-petition period was due to a seasonal increase of imports in ***, consistent with reports of higher demand in the late spring and summer reported by most responding U.S. producers and importers. Target Prehearing Br. at 11-15; Target Posthearing Br. at 4. For their part, Hallmark and Sophistiplate argue that import volumes simply ebbed and flowed in response to seasonal demand for paper plates, increasing in months with holidays such as October 2023 (Halloween and football), February 2024 (Valentines Day), and June 2024 (peak summertime). Hallmark Posthearing Br. at 6-7.

²³⁰ Target Prehearing Br. at 14-15; Target Posthearing Br. at 4; Hallmark Posthearing Br. at 3-5, 7.

²³¹ Target Prehearing Br. at 16; Target Posthearing Br. at 4-5; Hallmark Posthearing Br. at 11-12.

²³² Acadian states that although Commerce preliminarily found critical circumstances to exist for Jinhua in the antidumping duty investigation on paper plates from China, Commerce reversed course and issued a final negative critical circumstances finding with respect to Jinhua. It contends that as a result, the Commission should not include Jinhua’s imports as part of its critical circumstances analysis. Acadian Posthearing Br. We do not include Jinhua’s imports in our critical circumstances analysis.

²³³ Target Prehearing Br. at 17; Target Posthearing Br. at 7-8; Cannon Group Prehearing Br. at 4-5; Hallmark Posthearing Br. at 8. The Cannon Group notes that the percentile increase in subject imports was large primarily because the pre-petition volumes of relevant imports were so small. Cannon Group Prehearing Br. at 4.

²³⁴ Target Prehearing Br. at 18; Target Posthearing Br. at 7-8; Cannon Group Prehearing Br. at 5; Hallmark Posthearing Br. at 8. Also according to the Cannon Group, this small increase in import volume (Continued...)

increase in inventory levels in the post-petition period was equivalent to only *** percent of apparent U.S. consumption in interim 2024, and that such a small volume of inventories did not create a “stockpile” that could undermine the remedial effect of the orders, particularly within the context of the overall U.S. market.²³⁵

C. Analysis

The petitions in these investigations were filed on January 25, 2024.²³⁶ We first consider the appropriate period for comparisons in our critical circumstances analysis. The Commission frequently relies on six-month comparison periods, 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.²³⁷ With respect to the antidumping duty investigation on subject imports from Thailand, Commerce issued its preliminary affirmative determination on September 5, 2024, after the sixth month following the filing of the petition.²³⁸ Therefore, for our analysis of critical circumstances with respect to subject imports from Thailand, we will compare the volume of subject imports in the six months prior to the filing of the petitions (August 2023 – January 2024) with the volume of subject imports in the six months after the filing of the petitions (February 2024 – July 2024). However, with respect to the antidumping and countervailing duty investigations on subject imports from China and Vietnam, Commerce issued its preliminary countervailing duty determinations on July 1, 2024, during the sixth month of the post-petition period of February 2024-July 2024.²³⁹ Therefore, for our analysis of critical circumstances with respect to subject imports from China and Vietnam, we will compare the volume of subject imports in the five months prior to the filing of the petitions (September 2023 – January 2024) with the volume of subject imports in the five months after the filing of the petitions (February 2024 – June 2024).^{240 241}

(...Continued)

does not merit an affirmative critical circumstances finding in light of increasing apparent U.S. consumption during this time period. Cannon Group Prehearing Br. at 6.

²³⁵ Target Prehearing Br. at 18; Target Posthearing Br. at 8-9; Cannon Group Prehearing Br. at 9-10; Hallmark Posthearing Br. at 12.

²³⁶ CR/PR at Table I-1.

²³⁷ 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).

(Continued...)

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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).

²³⁸ CR/PR at Table I-1; *Certain Paper Plates from Thailand: Preliminary Affirmative Determination of Sales at Less than Fair Value, Preliminary Affirmative Determination of Critical Circumstances, in Part, Postponement of Final Determination, and Extension of Provisional Measures*, 89 Fed. Reg. 72,370 (Sept. 5, 2024). Because the petitions were filed very late in the month of January 2024, that month is included in the pre-petition period, per standard Commission practice.

²³⁹ CR/PR at Table I-1; *Certain Paper Plates from the People's Republic of China: Preliminary Affirmative Countervailing Duty Determination, Preliminary Affirmative Determination of Critical Circumstances, in Part, and Alignment of Final Determination with Antidumping Duty Determination*, 89 Fed. Reg. 54,432 (July 1, 2024); *Certain Paper Plates from the Socialist Republic of Vietnam: Preliminary Affirmative Countervailing Duty Determination, Preliminary Affirmative Determination of Critical Circumstances, in Part, and Alignment of Final Determination with Antidumping Duty Determination*, 89 Fed. Reg. 54,429 (July 1, 2024).

²⁴⁰ CR/PR at Table IV-8. Commerce's preliminary critical circumstance determinations with respect to the antidumping duty investigations on subject imports from China and Vietnam were rendered on September 5, 2024, subsequent to six months after the filing of the petitions. CR/PR at Table I-1; *Certain Paper Plates from the People's Republic of China: Preliminary Affirmative Determination of Sales at Less than Fair Value, Preliminary Affirmative Determination of Critical Circumstances, in Part, Postponement of Final Determination, and Extension of Provisional Measures*, 89 Fed. Reg. 72,367 (Sept. 5, 2024); *Certain Paper Plates from the Socialist Republic of Vietnam: Preliminary Affirmative Determination of Sales at Less than Fair Value, Preliminary Affirmative Determination of Critical Circumstances, in Part, Postponement of Final Determination, and Extension of Provisional Measures*, 89 Fed. Reg. 76,508 (Sept. 5, 2024). However, consistent with previous cases, we use the same pre- and post-petition periods for both antidumping and countervailing duty critical circumstances analyses. *See e.g., Small Vertical Shaft Engines from China*, Inv. Nos. 701-TA-643 and 731-TA-1493 (Final) USITC Pub. 5185 (Apr. 2021) at 43 n.243; *Corrosion-Resistant Steel Products from China, India, Italy, Korea, and Taiwan*, Inv. Nos. 701-TA-534-538 and 731-TA-1274-1278 (Final), USITC pub. 4620 (Jul. 2016) at 35-36. Both the APPC and respondents agree with the use of 5-month comparison periods for the analysis with respect to the antidumping and countervailing duty investigations on subject imports from China and Vietnam. APPC Prehearing Br. at 42 n.178; Target Prehearing Br. at 7; Cannon Group Prehearing Br. at 3; Hallmark Posthearing Br. at 3.

²⁴¹ The Commission may also use different periods when the product is seasonal. *See 1,1,1,2--Tetrafluoroethane (R-134a) from China*, Inv. No. 731-TA-1313 (Final), USITC Pub. 4679 at 25 (April 2017) (seasonal product); *Certain Polyester Staple Fiber from China*, Inv. No. 731-TA-1104 (Final), USITC Pub. 3922 at 35 (June 2007) (declining to analyze different periods absent seasonality). The record indicates that sales of paper plates in the U.S. market is subject to seasonal business cycles. Six of seven U.S. producers indicated that the market was subject to seasonal demand and sales trends, with increases in sales and demand for paper plates occurring during the summer, and five of those six producers noted that demand for paper plates also increases around the holidays, especially in November and December. Twelve of 18 U.S. importers also acknowledged that the market was subject to business cycles, usually based on major holidays, and 12 of 18 purchasers indicated that summer and holiday periods (such as Thanksgiving, Christmas, Super Bowl, Valentines Day, and Halloween) experienced higher demand. (Continued...)

1. China Investigations

Subject imports from China subject to Commerce’s affirmative critical circumstances determinations in the antidumping and countervailing duty investigations increased from *** paper plates in the pre-petition period to *** paper plates in the post-petition period, an increase of *** percent.²⁴² End-of-period U.S. inventories of the relevant subject imports from China increased from *** paper plates at the end of the pre-petition period to *** paper plates at the end of the post-petition period, an increase of *** percent.²⁴³

The volume of imports in the post-petition period was substantial. The volume of the increase, *** paper plates, was equivalent to *** percent of apparent U.S. consumption in interim 2024, and the total volume of these imports was equivalent to *** percent of apparent U.S. consumption in interim 2024.²⁴⁴ Due in large part to this surge in subject imports in the post-petition period, the total volume of subject imports from China in interim 2024 (*** paper plates) was higher than their volume in full year 2021 (*** paper plates), *** percent of their volume in full year 2022 (*** paper plates), and *** percent of their volume in full year 2023 (*** paper plates).²⁴⁵ And while apparent U.S. consumption in interim 2024 was higher by *** percent compared to interim 2023, U.S. shipments of subject imports from China were higher by a much greater *** percent, as subject imports from China captured *** percentage points of market share over the interim periods, more than doubling their share from interim 2023 to interim 2024.²⁴⁶

(...Continued)

CR/PR at II-13. However, no parties advocated for the use of different periods to analyze critical circumstances based upon seasonality.

²⁴² CR/PR at Table IV-5.

²⁴³ CR/PR at Table IV-6.

²⁴⁴ CR/PR Tables IV-5 and IV-16 (comparing the increase of post-petition imports (*** paper plates) from February 2024 to July 2024 to apparent U.S. consumption in interim 2024 (*** paper plates)). Notwithstanding the post-petition increase in volume, subject imports’ share of apparent U.S. consumption in interim 2024 was lower by *** percentage point at *** percent, compared to *** percent in interim 2023. *See id.* at Table IV-16.

²⁴⁵ CR/PR at Tables IV-2.

²⁴⁶ CR/PR at Tables C-1 and IV-16. We are unpersuaded by respondents’ contention that the increase in post-petition import volume does not constitute the type of “massive surge” that the Commission has previously found to undermine the remedial effect of an order. *See, e.g., Target Prehearing Br.* at 14. As an initial matter, each Commission determination is *sui generis*. *See Committee for Fair Beam Imports v. United States*, 27 CIT 932, 942 (2003), *aff’d per curiam*, 95 Fed. Appx. 347 (Fed. Cir. 2004). In any event, the Commission has, in fact, made affirmative critical circumstances findings involving similar increases in subject import volume in the post-petition period compared to the pre-petition period, particularly when the increase was appreciable relative to apparent U.S. consumption. (Continued...)

The post-petition increase in the volume of subject imports from China not only allowed subject imports to capture additional market share as they increased their U.S. shipments, but also resulted in increasing end-of-period inventories. End-of-period inventories of the relevant subject imports from China were higher by *** paper plates, or by *** percent, in the post-petition period.²⁴⁷

With respect to pricing, prices of subject imports from China for pricing product 4 declined from the first quarter of 2024 to the second quarter of 2024 as subject imports undersold the domestic like product in both quarterly comparisons.²⁴⁸ The vast majority of reported sales of subject imports from China, *** percent, were sales of product 4. The pricing data show that underselling of the domestic like product by subject imports intensified in interim 2024, with the average underselling margin increasing from *** percent in 2023 to *** percent in interim 2024.²⁴⁹ Consistent with this, AUVs of subject imports from China dropped by *** percent over the interim periods.²⁵⁰

In addition to the foregoing, the Commission views the timing of the increase in subject imports from China in the post-petition period as instructive. The quantity of the relevant subject imports in four of the five months of the post-petition period (February, March, May and June) exceeded the volume of subject imports recorded in any month during the pre-petition period, peaking in June 2024 at *** paper plates.²⁵¹ Given that the *** largest U.S.

(...Continued)

See, e.g., Mattresses from Bosnia and Herzegovina, Bulgaria, Burma, Italy, Philippines, Poland, Slovenia, and Taiwan, Inv. Nos. 731-TA-1629-1631, 1633, 1636-1638, and 1640 (Final), USITC Pub. 5520 at 68-69 (June 2024) (finding that affirmative critical circumstances existed for subject imports from Burma, which increased by 101.6 percent, with the volume involved in the increase equivalent to 2.3 percent of apparent U.S. consumption in 2023); *Raw Honey from Argentina, Brazil, India, and Vietnam*, Inv. Nos. 731-TA-1560-1562 and 1564 (Final), USITC Pub. 5327 at 46-47 (May 2022) (finding that critical circumstances existed for subject imports from Vietnam, which increased by 83.2 percent in the post-petition period, resulting in total post-petition volumes equivalent to 18.9 percent of apparent U.S. consumption in the interim period).

²⁴⁷ CR/PR at Table IV-6.

²⁴⁸ CR/PR at Table V-7. The two largest importers of subject imports from China were *** and ***, which accounted for *** percent of imports from China in 2023. CR/PR at Table IV-1. Both confirmed that subject imports from China were lower-priced than the domestic like product. CR/PR at V-16. As noted earlier, Walmart reported that it saved an estimated *** percent of the purchaser price by importing paper plates rather than purchasing from a U.S. producer. CR/PR at V-19.

²⁴⁹ CR/PR at Table V-12.

²⁵⁰ CR/PR at Table C-1. While recognizing that average unit values (“AUVs”) may be affected by changes in product mix, we note that AUVs of subject imports from China dropped from *** in interim 2023 to *** in interim 2024, or by *** percent. *Id.*

²⁵¹ CR/PR at Tables IV-5 and IV-15.

importers accounting for the bulk of the relevant subject imports made *** percent of their sales produced-to-order, with lead times averaging *** days and *** days, respectively, subject imports arriving in May and June would have been ordered in the weeks immediately following the filing of the petitions on January 25, 2024, consistent with a deliberate effort to increase imports prior to the effective date of relief.²⁵²

We are not persuaded by respondents' argument that the increase in subject imports from China in the post-petition period was in response to increased seasonal demand for paper plates.²⁵³ Indeed, the data do not support such a claim. Specifically, the aggregate volume of imports from all sources and U.S. shipments of the domestic like product did not increase during the months corresponding to the post-petition period compared to the months corresponding to the pre-petition period in prior years of the POI.²⁵⁴ Moreover, to the extent that seasonality affects demand for paper plates in specific months, market participants reported that there is increased demand during the fall and winter holidays (including Thanksgiving and Christmas) as well as in the summer,²⁵⁵ yet monthly quantities of the relevant subject imports in November 2023 and December 2023 covered by the pre-petition period were lower than quantities in each month of the post-petition period.²⁵⁶

In light of the foregoing, we find the adverse impact of the subject imports from China subject to Commerce's affirmative critical circumstances determinations on the domestic industry is likely to undermine seriously the effect of the antidumping and countervailing duty orders. Accordingly, we determine that critical circumstances exist with respect to subject imports from China.

²⁵² *** , which accounted for *** percent of subject imports from China in 2023, reported that *** percent of its sales of paper plates from China were produced-to-order, with lead times average *** days. *** , which accounted for *** percent of subject imports from China in 2023, also reported that *** percent of its sales of paper plates from China were produced-to-order with lead times averaging *** days. CR/PR at Table IV-1; *** U.S. Importer Questionnaire Response at III-9; *** U.S. Importer Questionnaire Response at III-9. We note that *** days and *** days after the filing of the petitions on January 25, 2024 would be April 25, 2024 and May 25, 2024, respectively.

²⁵³ Target Prehearing Br. at 11-15; Target Posthearing Br. at 4; Hallmark Posthearing Br. at 6-7.

²⁵⁴ *Derived from* CR/PR at Table IV-15. The total quantity of U.S. shipments of the domestic like product and U.S. imports from all sources in September 2021-January 2022 and February 2022-June 2022 was approximately the same, and the total quantity declined by two percent from September 2022-January 2023 to February 2023-June 2023. *See id.*

²⁵⁵ CR/PR at II-13.

²⁵⁶ CR/PR at Table IV-5.

2. Thailand Investigation

Subject imports from Thailand subject to Commerce’s affirmative critical circumstances determination in the antidumping investigation increased from *** paper plates in the pre-petition period to *** paper plates in the post-petition period, an increase of *** percent.²⁵⁷ End-of-period U.S. inventories of the relevant subject imports from Thailand were *** paper plates throughout the pre-petition and post-petition periods.²⁵⁸

Although the volume of subject imports from Thailand was higher in the post-petition period as compared to the pre-petition period, the increase in imports compared to the pre-petition period, *** paper plates, was exceedingly small in relation to the U.S. market, equivalent to *** percent of apparent U.S. consumption in interim 2024.²⁵⁹ That end-of-period inventories remained *** throughout the pre- and post-petition periods indicates that there no stockpiling of subject imports from Thailand after the filing of the petition.²⁶⁰

In light of these considerations, we do not find that the subject imports from Thailand subject to Commerce’s critical circumstances determination are likely to undermine seriously the remedial effect of the antidumping duty order. Accordingly, we determine that critical circumstances do not exist with respect to subject imports from Thailand.

3. Vietnam Investigations

Subject imports from Vietnam subject to Commerce’s affirmative critical circumstances determinations in the antidumping and countervailing duty investigations increased from ***

²⁵⁷ CR/PR at Table IV-7.

²⁵⁸ CR/PR at Table IV-8. Contrary to the APPC’s argument that ***, APPC Final Comments at 3, *** complied with the questionnaire’s instructions to report merchandise shipped to retail establishments as internal consumption rather than as inventories. U.S. Importer Questionnaire Response at page 10, “Definitions.”

²⁵⁹ CR/PR Tables IV-7 and IV-16 (comparing the increase of post-petition imports (***) paper plates) from February 2024 to July 2024 to apparent U.S. consumption in interim 2024 (***) paper plates)). Notwithstanding the post-petition increase in volume, subject imports’ share of apparent U.S. consumption in interim 2024 was lower by *** percentage point at *** percent, compared to *** percent in interim 2023. *See id.* at Table IV-16. The total volume of these imports was equivalent to *** percent of apparent U.S. consumption in interim 2024. *See id.*

²⁶⁰ CR/PR at Table IV-8. With respect to pricing in the post-petition period, prices for subject imports from Thailand for pricing product 2 increased in the first two quarters of the 2024 as subject imports undersold the domestic like product in one of two quarterly comparisons and prices for subject imports from Thailand for pricing product 3 decreased as subject imports undersold the domestic like product in both quarterly comparisons. CR/PR at Tables V-5-6. No pricing data for subject imports from Thailand were reported for pricing products 1 and 4. CR/PR at Tables V-4 and V-7.

paper plates in the pre-petition period to *** pounds in the post-petition period, an increase of *** percent.²⁶¹ End-of-period U.S. inventories of the relevant subject imports from Vietnam increased from *** paper plates at the end of the pre-petition period to *** paper plates at the end of the post-petition period.²⁶²

Although the volume of subject imports from Vietnam was higher in the post-petition period as compared to the pre-petition period, the increase in imports compared to the pre-petition period, *** paper plates, was exceedingly small in relation to the U.S. market, equivalent to just *** percent of apparent U.S. consumption in interim 2024.²⁶³ While end-of-period inventories of subject imports from Vietnam were *** percent higher in the post-petition period than in the pre-petition period, the increase was equivalent to only *** percent of apparent U.S. consumption in interim 2024, indicating that there was no meaningful stockpiling of subject imports from Vietnam after the filing of the petitions.²⁶⁴

In light of these considerations, we do not find that imports from Vietnam subject to Commerce's critical circumstances determinations are likely to undermine seriously the remedial effect of the antidumping and countervailing duty orders. Accordingly, we determine that critical circumstances do not exist with respect to subject imports from Vietnam.

VIII. Conclusion

For the reasons stated above, we determine that an industry in the United States is materially injured by reason of imports of paper plates from China, Thailand, and Vietnam that are sold in the United States at less than fair value and imports of paper plates from China and Vietnam that are subsidized by the governments of China and Vietnam. We find that critical circumstances exist with respect to imports of paper plates from China that are subject to

²⁶¹ CR/PR at Table IV-9.

²⁶² CR/PR at Table IV-10.

²⁶³ CR/PR Tables IV-9 and IV-16 (comparing the increase of post-petition imports (*** paper plates) from February 2024 to June 2024 to apparent U.S. consumption in interim 2024 (*** paper plates)). In interim 2024, subject imports' share of apparent U.S. consumption was higher by only *** percentage points at *** percent, compared to *** percent in interim 2023. *See id.* The total volume of these imports was equivalent to *** percent of apparent U.S. consumption in interim 2024. *See id.*

²⁶⁴ CR/PR at Table IV-10. With respect to pricing in the post-petition period, prices for subject imports from Vietnam for pricing product 3 remained the same in the first two quarters of the 2024 as subject imports undersold the domestic like product in both quarterly comparisons. Subject imports undersold the domestic like product in the only quarterly comparison available for pricing product 4. CR/PR at Tables V-6-7. No pricing data for subject imports from Vietnam were reported for pricing products 1 and 2. CR/PR at Tables V-4-5.

Commerce's final affirmative critical circumstances determinations.²⁶⁵ We also find that critical circumstances do not exist with respect to imports of paper plates from Thailand and Vietnam that are subject to Commerce's final affirmative critical circumstances determinations.²⁶⁶

²⁶⁵ Commissioner David S. Johanson dissenting.

²⁶⁶ Commissioner Jason E. Kearns dissenting.

Separate Views of Commissioner David S. Johanson

I join the Commission's Views on material injury in their entirety, but I write separately as I do not join the Commission's affirmative determination of critical circumstances regarding China. I instead make a negative critical circumstances determination regarding paper plates from that country. I also join, however, the majority's discussion of the legal standards and the parties' arguments regarding critical circumstances (Sections VII.A and VII.B) as well as the majority's reasoning regarding the use of a 5-month period of comparison and the majority's negative critical circumstances determination regarding paper plate imports from Thailand and Vietnam (Sections VII.C.1 and VII.C.2).

As discussed below, I do not find that the increase in imports and inventories of subject paper plates from China in the post-petition comparison period would be likely to "undermine seriously the remedial effect" of the antidumping and countervailing duty orders because (1) the increase in volume of subject imports was small in relation to U.S. consumption and to U.S. production and sales; (2) the increase in inventories of these imports was even less substantial; (3) the domestic industry earned high profits and increased its shipments after the Petitions were filed despite the increase in subject import volume; and (4) increased importation of imports by *** importers, which accounted for *** of subject imports, were less likely to seriously undermine the remedial effect of the orders in light of evidence that the imports were made for non-price reasons and that the alternative to these imports was nonsubject imports, not the domestic like product.

I. Unfairly traded imports from China in the post-petition period were small in relation to U.S. producers' production and shipments and the U.S. market

A. The volume of imports was not large enough to seriously undermine the remedial effects of the orders

During the five months following the filing of the petitions, imports from China subject to Commerce's affirmative final critical circumstances determinations measured *** paper plates, an increase of *** percent or *** billion paper plates relative to the five previous months.¹

¹ Calculated from CR/PR at Table IV-5.

Although Commerce found that increases of subject imports were massive, the statute requires the Commission separately to assess the timing and volume of the imports subject to Commerce’s affirmative critical circumstances finding.²

In this case, Commerce suspended liquidation of entries of subject paper plates from China on July 1, 2024, and will issue an order following transmission to Commerce of the Commission’s final determination in March 2025.³ The U.S. industry produced 26.7 billion paper plates in the first half of 2024, the period that encompasses the post-petition surge, and shipped 26.2 billion paper plates in the U.S. market.⁴ The increase in volume between the pre-petition and post-petition periods of *** paper plates, or “surge,” amounted to only *** percent of the U.S. industry’s production and U.S. shipments in the most proximate half-year period, the first half of 2024, and only *** percent of apparent U.S. consumption in the first half of 2024.⁵

Looking forward, these historical data likely overstate the relative importance of the surge volume because U.S. consumption has recently been increasing, the domestic industry’s market share also is likely to be larger than in the past following the newly imposed orders, and Petitioner states that demand is generally expected to continue to improve as consumers switch from plastic and Styrofoam to more sustainable materials such as paper.⁶

Accordingly, seen in the context of the strong and improving production, shipments, and demand that the domestic industry has experienced and is likely to experience as it benefits from the orders, I do not find that the volume of imports subject to Commerce’s critical circumstances determination weighs in favor of finding that the import surge is likely to seriously undermine the orders’ remedial effects.

² The statute directs Commerce to consider whether there have been “massive imports of the subject merchandise over a relatively short period”; Commerce may consider an increase of 15 percent or more to be “massive.” 19 U.S.C. 1671d(a)(2)(B); 19 U.S.C. 1673d(a)(2)(B); 19 C.F.R. 351.206(h)(2). I take Commerce’s findings that import surges were “massive” as a given for purposes of the Commission’s task of assessing the likelihood the surge will seriously undermine the orders’ remedial effect.

³ “Certain Paper Plates From the People’s Republic of China: Final Affirmative Countervailing Duty Determination and Final Affirmative Determination of Critical Circumstances, in Part,” 90 Fed. Reg. 8281, 8282 (Dep’t Commerce Jan. 28, 2025).

⁴ CR/PR at Table C-1.

⁵ Calculated from CR/PR at Tables IV-5 and C-1.

⁶ APPC Prehearing Br. 17.

B. The timing of the surge does not indicate that it will seriously undermine the orders' remedial effects

In addition to considering the volume of the surge in imports the statute also directs us to consider their timing.⁷

As noted above, respondents argue that the increase in subject imports following the filing of the petitions was seasonal, reflecting higher demand in the summer, or seasonal patterns of holidays such as Halloween or Valentine's Day.⁸

Petitioner denies that the surges reflect seasonal patterns, asserting that subject imports in prior years did not follow the patterns that respondents claim are seasonal.⁹ Rather, Petitioner argues that "the post-petition imports were not simply serving increased demand but rather represented a deliberate effort to enter product into the U.S. market in *** volumes before the imposition of provisional measures."¹⁰ They also argue that the critical circumstances provision is meant to deter foreign exporters and U.S. importers from attempting to circumvent the trade remedy laws by increasing shipments immediately after a petition but before imposition of preliminary trade relief.¹¹

Whether a given volume of imports arrives during seasonal peaks or troughs may influence their impact on a domestic industry that must compete against them during high or low seasons, but given the numerous seasons and holidays that influence paper plate demand¹² I do not see any clear seasonal pattern in this record.

At the same time, I do not find that the intent of importers is material to whether a massive surge will or will not seriously undermine the remedial effect of an order: a surge may undermine an order even if importers had no intention to do so, or may not undermine an order even if they did. The statute does not incorporate an intent test or requirement.

Accordingly, I do not find that the timing of the import surge indicates that the surge is likely to seriously undermine the remedial effect of the orders.

II. The post-petition increase in inventories of subject imports from China was small and not likely to seriously overhang the U.S. market

The statute also directs the Commission to consider "any rapid increase in inventories of the imports" subject to Commerce's critical circumstances determination.

⁷ 19 U.S.C. 1671d(b)(4)(A), 1673d(b)(4)(A).

⁸ Target Prehearing Br. 11-15; Target Posthearing Br. 4; Hallmark Posthearing Br. at 6-7.

⁹ APPC Posthearing Br. at 13-14; APPC Final Comments at 2-3.

¹⁰ APPC Posthearing Br. 7.

¹¹ APPC Prehearing Br. 41.

¹² See CR/PR at II-13.

The post-petition increase in U.S. importers' inventories of subject merchandise from China subject to Commerce's critical circumstances determinations was rapid but was nevertheless small in the context of U.S. production and shipments, and thus unlikely to linger and seriously overhang the market over the course of the order. From the end of January 2024 to the end of June 2024 these inventories increased from *** paper plates to *** paper plates, an increase of *** percent or *** paper plates.¹³ That increase of *** paper plates corresponded to only *** percent of U.S. apparent consumption in the first half of 2024 alone, however.¹⁴ This increase in inventories is nugatory, particularly considering that some of the inventories of plates imported between the petitions and the suspension of liquidation have likely been consumed and destroyed by now.¹⁵

III. The domestic industry's performance is improving

The statute also directs the Commission to consider "other factors it considers relevant."¹⁶

One factor I consider relevant is that the domestic industry's performance improved by most measures in the first half of 2024, immediately after the petitions were filed.

The domestic industry's profits did decrease from 2021 along with its U.S. market share, and in the first half of 2024 the domestic industry's share of the growing U.S. market was smaller than in the first half of 2023.¹⁷

Yet, it is also true that domestic producers' performance in other ways was better in the first half of 2024 than in the first half of 2023. Its production was 10.4 percent larger, its capacity 2.4 percent greater, its U.S. shipments and U.S. sales each 5.0 percent greater by quantity and 1.5 percent greater by value, its workforce was 132 workers or 2.7 percent larger, its gross profits 25.4 percent higher, its operating income 36.7 percent greater, its net income *** percent higher, and its ratio of operating income to sales was 18.0 percent.¹⁸ The domestic industry decided to add practical production capacity in every period of the POI including the first half of 2024, indicating confidence in the future.¹⁹

¹³ Calculated from CR/PR at Table IV-6.

¹⁴ Calculated from CR/PR at Table C-1.

¹⁵ Paper plates are typically discarded after use. CR/PR at I-11.

¹⁶ 19 U.S.C. 1671d(b)(4)(ii), 1673d(b)(4)(ii).

¹⁷ CR/PR at Table C-1.

¹⁸ CR/PR at Table C-1.

¹⁹ CR/PR at Table C-1.

This improving performance does not indicate that the domestic industry will be unable to avail itself of the remedial effects of the orders. With orders in place, moreover, these positive trends are likely to be strengthened.

I recognize that several *** U.S. producers reported having significant difficulties during the period of investigation. *** of eight producers were profitable *** on an operating basis and the industry as a whole reported 36.7 percent higher operating profits in the first half of 2024 than in the first half of 2023, along with steadily increasing capacity.²⁰ Yet *** reported net losses in ***.²¹ ***.²² ***.²³

Nevertheless, ***.²⁴ The record does not indicate that even these producers will be unable to benefit from the remedial effect of the orders, let alone that the remedial effect of the orders will be seriously undermined for the industry as a whole.

IV. Subject imports or purchases by * that would have been replaced by nonsubject imports did not displace domestic plates in the market**

Another relevant factor relates to the role of nonsubject imports as alternatives to subject imports in some instances.

From January 2021 through June 2024, ***.²⁵ ***.²⁶

These two firms both reported that they purchased subject imports instead of domestic like products for nonprice reasons.²⁷ Both also reported replacing imports of subject imports from China largely with nonsubject imports in their arranged imports through 2025. ***.²⁸ ***.²⁹ Similarly, ***.³⁰

A surge of subject imports may undermine the remedial effect of an order by displacing domestic products or having other price effects on the domestic industry. Yet, to the extent a surge in subject imports merely replaces nonsubject imports that would otherwise have been imported or that would have had similar price effects, that surge does not impact the order's remedial effect on domestic industry production, shipments, or prices.

²⁰ CR/PR at Tables VI-3 & C-1.

²¹ CR/PR at Table VI-3. *** CR/PR at Table III-1.

²² CR/PR at Table VI-13.

²³ CR/PR at Table VI-13.

²⁴ CR/PR at Tables VI-3, VI-5.

²⁵ Calculated from CR/PR at Table V-15.

²⁶ CR/PR at Table IV-1.

²⁷ ***. CR/PR at Table V-16.

²⁸ ***.

²⁹ Email from ***.

³⁰ ***.

I find that there are indications that in the case of these two *** importers and purchasers at least some of the surge in subject imports or purchases of subject imports would have substituted for nonsubject imports, and that this substitution would make it less likely that the orders' remedial effect would be seriously undermined.

V. Conclusion

For the reasons stated above I conclude that imports from China that are subject to Commerce's affirmative critical circumstances determination are not likely to undermine seriously the remedial effect of the antidumping and countervailing duty orders to be issued on paper plates from China.

Separate Views of Commissioner Jason E. Kearns on Critical Circumstances

While I join the Commission's Views on material injury in their entirety, I write separately as I do not join the Commission's negative finding of critical circumstances regarding Vietnam and instead make an affirmative critical circumstances finding with regard to paper plates from that country. I join, however, the majority's discussion of the legal standards and the parties' arguments regarding critical circumstances (Sections VII.A. and VII.B.) as well as the majority's reasoning regarding the length of the periods of comparison (Section VII.C.), and its affirmative critical circumstances determination regarding paper plates from China (Section VII.C.1.) and negative critical circumstances determinations regarding paper plates from Thailand (Section VII.C.2.).

As discussed below, I find that the dramatic increase in subject imports from Vietnam and increase in inventories in the post-petition period is likely to undermine seriously the remedial effects of the order. These data point to a "rush" to import substantial volumes of product into the U.S. market at low prices before a deposit requirement takes effect. I differ from my colleagues in that I do not place as much weight on the share that these imports account for in the U.S. market.

I. Extremely High Increase in Post-Petition Imports and Large Increase in Inventories

The increase in imports from Vietnam subject to the affirmative critical circumstances determination by Commerce¹ is extraordinary in this case. Imports increased from *** paper plates to *** paper plates, an increase of *** paper plates, or *** percent between the five-month periods before and after the petition was filed, with an average of *** paper plates imported monthly in the pre-petition period (September 2023 to January 2024) and an average of *** paper plates imported monthly in the post-petition period (February 2024 to June 2024).² For comparison, the post-petition import surges in recent affirmative critical circumstances findings by the Commission were *** percent for China in the current

¹ On January 28, 2025, Commerce determined "critical circumstances" exist with regard to subsidized imports of paper plates from Vietnam for Xie Li Vietnam International Company ("Xie Li"), all other producers and exporters, and companies that were not responsive to Commerce's quantity and value (Q&V) questionnaire (Innovative Sonic Vietnam International, Ningbo Changya Plastic Vietnam Company, Ningbo Changya Plastic Vietnam, and SCG Vietnam), but not for Go-Pak Paper Products ("Go-Pak"). 90 FR 8258, January 28, 2025. On the same date, Commerce determined that "critical circumstances" exist with regard to imports of paper plates from Vietnam sold at LTFV for the Vietnam-Wide entity, but not for Go-Pak. 90 FR 8265, January 28, 2025.

² CR/PR at Table IV-9. Indeed, including all producers in Vietnam, including Go-Pak, in the first two months of the post-petition period (February and March 2024), the monthly volume of subject imports from Vietnam was the highest recorded at any point in the POI. CR/PR at Table IV-15.

investigation and 83.2 percent for Vietnam in *Raw Honey from Argentina, Brazil, India, and Vietnam*.³ The post-petition spike in critical circumstances imports from Vietnam helped drive a *** percent overall increase in subject imports from Vietnam between interim 2023 (January to June 2023) and interim 2024 (January to June 2024).⁴

There are cases where an unsophisticated importer may place a large new order, unaware that those imports are under investigation, and in those cases the increase in subject imports is an aberrational and merely coincidental blip that, depending on the circumstances, is unlikely to seriously undermine the remedial effect of the order. This is not such a case. The importers most responsible for the increase in pre- to post-petition imports were *** and ***. Of the *** paper plates increase in post-petition imports, *** was responsible for *** percent and *** was responsible for *** percent. *** is, of course, a top U.S. retailer accounting for over \$100 billion in retail sales in 2023.⁵ *** is a multinational company with ***.⁶ *** and *** have both imported merchandise within the scope of other recent investigations on which antidumping and countervailing duty orders have been placed.⁷

The statute also instructs the Commission to consider inventories in the post-petition period.⁸ A large increase in inventories can suggest that importers are stockpiling in advance of cash deposit requirements being imposed. In the case of Vietnam, end-of-period inventories nearly *** in the post-petition period, growing from *** paper plates to *** paper plates, an increase of *** percent.⁹

Respondents note that Vietnam has a small share of apparent U.S. consumption such that the increase in Vietnamese imports and in the inventories of subject imports from Vietnam during the post-petition period would not realistically be able to impact the U.S. market.^{10 11} As

³ CR/PR at Table IV-6; *Raw Honey from Argentina, Brazil, India, and Vietnam*, USITC Pub. 5327 at Table IV-8.

⁴ CR/PR at Table C-1.

⁵ National Retail Federation, <https://nrf.com/research-insights/top-retailers/top-100-retailers/top-100-retailers-2024-list>

⁶ ***

⁷ For example, *** was a respondent or responding importer on numerous antidumping/countervailing duty proceedings over the last five years, including one in which critical circumstances was alleged on Vietnam. See, e.g., *Paper Shopping Bags from Cambodia, China, Colombia, India, Malaysia, Portugal, Taiwan, Turkey, and Vietnam*, Inv. Nos. 701-TA-690-691 and 731-TA-1619-1627, USITC Pub. 5522 at 12. *** was a responding importer on *Non-Refillable Steel Cylinders from China*, Inv. Nos. 701-TA-644 and 731-TA-1494 (Final), USITC Pub. 5188 at Table IV-1, and *Non-Refillable Steel Cylinders from India*, Inv. Nos. 701-TA-689 and 731-TA-1618 (Final), USITC Pub. 5509 at Table IV-1.

⁸ Statutory factors to consider are listed at 19 U.S.C. §§ 1671d(b)(4)(A)(ii), 1673d(b)(4)(A)(ii).

⁹ CR/PR at Table IV-10.

¹⁰ For example, Target notes that the *** in imports in the post-petition period as compared to the pre-petition period and *** imports in the post-petition period amounted to only *** percent and

noted in my dissent on critical circumstances in *Mattresses from Bosnia and Herzegovina, Bulgaria, Burma, India, Indonesia, Italy, Kosovo, Mexico, Philippines, Poland, Slovenia, Spain, and Taiwan* (“*Mattresses III*”), that, in my view, is not how Congress views negligibility, or for that matter critical circumstances.¹² Instead, Congress has recognized that material injury can be caused by many small countries – what might be called “death by a thousand cuts” – and therefore instructs the Commission to aggregate countries that would individually be deemed to account for a negligible share of imports.¹³ While Congress does not instruct the Commission to also aggregate countries for critical circumstances determinations, that is because it requires the Commission to evaluate whether an increase in subject imports from one country would seriously undermine the remedial effect of “the order” *on that individual country* – not the remedial effect of “the orders” in the aggregate.^{14 15} I therefore put greater

*** of apparent consumption, respectively, during interim 2024. Target also notes that the overall U.S. market share of subject imports from Vietnam across the POI was ***, ranging from *** percent in 2021 to *** percent in interim 2024. Target Prehearing brief at 17-18. *See, also*, Cannon pre-hearing brief, at 4-6, and Hallmark and Sophistiplate post-hearing brief at 8. As for inventories, Target notes that the *** in inventories during the post-petition period represented only *** percent of apparent consumption during the interim 2024 period and that the end-of-month inventory for June 30, 2024, was equivalent to *** percent of apparent consumption for the interim 2024 period. Target Prehearing brief at 18. *See, also*, Cannon pre-hearing brief at 12 and Hallmark and Sophistiplate post-hearing brief at 12.

¹¹ Cannon notes that the percentage increase in subject imports in the post-petition period was inflated by the smaller baseline during the pre-petition period when excluding Go-Pak. Including Go-Pak, Cannon notes that the increase in the post-petition period is not as large. Cannon pre-hearing brief, at 5. However, the metric that we are statutorily required to analyze is the increase in post-petition imports among those producers subject to Commerce’s affirmative critical circumstance determination.

¹² Respondent *** recognized the similarities between the facts for Vietnam in this case and Bosnia in the *Mattresses III* case, in which the majority of Commissioners reached a negative critical circumstances determination on Bosnia. *See* Cannon pre-hearing brief at 7-8. I similarly dissented on Bosnia, finding that subject imports from Bosnia during the post-petition period seriously undermined the remedial effect of the order on Bosnia. *See* Separate Views of Commissioner Jason E. Kearns on Critical Circumstances, USITC Pub. 5520.

¹³ 19 U.S.C. § 1677(24)(A)(ii). Congress has also done so in instructing the Commission to cumulate subject countries under certain conditions for the purposes of the material injury analysis. 19 U.S.C. §§ 1677 (G)(i)

¹⁴ 19 U.S.C. §§ 1671d(b)(4)(A)(i), 1673d(b)(4)(A)(i). The statute requires a consideration of whether “the imports subject to the affirmative determination...are likely to undermine seriously the remedial effect of the {antidumping duty/countervailing duty} order to be issued. . .” The order here is each order issued only on imports from Vietnam (i.e. the antidumping order and the countervailing duty order).

¹⁵ Consider, for example, imports from 10 countries that individually account for a minor share of the U.S. market, but imports from each increased massively in the post-petition period. It would be inconsistent to find that the order would be seriously undermined if the aggregate imports were from one country, but not if they come from 10 separate countries. Similarly, using market share as a primary metric means that the smaller the presence in the market of *total* U.S. imports from all countries the

weight, at least in an extreme case such as this one, on the magnitude of the increase in imports from the pre-petition to the post-petition period than on the share of apparent consumption represented by the increase in post-petition imports, total post-petition imports, or overall subject imports from Vietnam.

II. Increasing Underselling in the Post-Petition Period

Only two importers provided pricing data for sales of requested products, but these data on pricing products indicate that importers sold the surging subject imports from Vietnam into the U.S. market at increasing margins of underselling in the first half of 2024 (a period roughly equivalent to the five-month post-petition period). With respect to pricing product 3 that contains nearly all the pricing comparisons for Vietnam over the POI, prices of U.S. shipments of subject imports from Vietnam stayed at low levels in 2024 but at increasing margins of underselling. From the second quarter of 2023 through the second quarter of 2024, the average unit price held steady at \$***, the lowest point of the POI.¹⁶ While this was *** percent lower than the U.S. price in the second quarter of 2023, it was *** percent lower than the U.S. price in the first quarter of 2024.¹⁷ As for pricing product 4, subject imports from Vietnam suddenly emerged in the U.S. market in the second quarter of 2024, at virtually the same price as subject imports from China, underselling the U.S. domestic like product by *** percent.¹⁸

Given what we know about this market, including the importance of price in purchasing decisions, the degree of substitutability between subject imports and the domestic like product, combined with the dramatic increase in imports from Vietnam, build-up of inventories, and the increasing underselling of the domestic like product in the post-petition period, I find that the remedial effect of both the antidumping and countervailing duty order with respect to subject imports from Vietnam will likely be seriously undermined. I therefore make an affirmative critical circumstances finding with respect to subject imports from Vietnam.

less likely it is to find affirmative critical circumstances on subject imports from any one country, regardless of the trends in the imports from that country.

¹⁶ CR/PR at Table V-6.

¹⁷ CR/PR at Table V-6.

¹⁸ CR/PR at Table V-7. While recognizing that average unit values (“AUVs”) may be affected by changes in the product mix, I also note that the AUVs of U.S. shipments of subject imports from Vietnam declined from \$*** in interim 2023 to \$*** in interim 2024, or by *** percent. CR/PR at Table C-1.

Part I: 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 the American Paper Plate Coalition (“APPC”), which is comprised of AJM Packaging Corporation (“AJM Packaging”), Bloomfield Hills, Michigan; Aspen Products, Inc. (“Aspen Products”), Kansas City, Missouri; Dart Container Corporation (“Dart Container”), Mason, Michigan; Hoffmaster Group, Inc. (“Hoffmaster”), Oshkosh, Wisconsin; Huhtamaki Americas, Inc. (“Huhtamaki Americas”), De Soto, Kansas; and Unique Industries, Inc. (“Unique Industries”), Philadelphia, Pennsylvania on January 25, 2024, alleging that an industry in the United States is materially injured and threatened with material injury by reason of subsidized imports of paper plates¹ from China and Vietnam and less-than-fair-value (“LTFV”) imports of paper plates from China, Thailand, and Vietnam. Table I-1 presents information relating to the background of these investigations.^{2 3}

Table I-1
Paper plates: Information relating to the background and schedule of this proceeding

Effective date	Action
January 25, 2024	Petitions filed with Commerce and the Commission; institution of the Commission's investigations (89 FR 6130, January 31, 2024)
February 14, 2024	Commerce's notice of initiation for CVD investigations (89 FR 13043, February 21, 2024)
February 14, 2024	Commerce's notice of initiation for AD investigations (89 FR 14046, February 26, 2024)
March 11, 2024	Commission's preliminary determinations (89 FR 18970, March 15, 2024)
July 1, 2024	Commerce's preliminary CVD determinations (89 FR 54429, 89 FR 54432, July 1, 2024)
September 5, 2024	Commerce's preliminary AD determinations (89 FR 72367, 89 FR 72370, 89 FR 72375, September 5, 2024); scheduling of final phase of Commission investigations (89 FR 76508, September 18, 2024)

¹ See the section entitled “The subject merchandise” in Part I 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 the Federal Register notice cancelling the Commission's hearing.

Effective date	Action
January 23, 2025	Scheduled date for the Commission’s hearing. This hearing was subsequently cancelled (90 FR 8142, January 24, 2025)
January 28, 2025	Commerce’s final determinations (90 FR 8258, 90 FR 8262, 90 FR 8265, 90 FR 8271, and 90 FR 8281, January 28, 2025)
February 24, 2025	Commission’s vote
March 13, 2025	Commission’s views

Statutory criteria

Section 771(7)(B) of the Tariff Act of 1930 (the “Act”) (19 U.S.C. § 1677(7)(B)) provides that in making its determinations of injury to an industry in the United States, the Commission--

shall consider (I) the volume of imports of the subject merchandise, (II) the effect of imports of that merchandise on prices in the United States for domestic like products, and (III) the impact of imports of such merchandise on domestic producers of domestic like products, but only in the context of production operations within the United States; and. . . may consider such other economic factors as are relevant to the determination regarding whether there is material injury by reason of imports.

Section 771(7)(C) of the Act (19 U.S.C. § 1677(7)(C)) further provides that--⁴

In evaluating the volume of imports of merchandise, the Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States is significant. . . In evaluating the effect of imports of such merchandise on prices, the Commission shall consider whether. . . (I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and (II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree. . . In examining the impact required to be considered under subparagraph (B)(i)(III), the Commission shall evaluate (within the context of the business cycle and conditions of competition that are distinctive to the affected industry) all relevant economic factors which have a bearing on the state of the industry in the United States, including, but not limited to. . . (I) actual and potential decline in output, sales,

⁴ Amended by PL 114-27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.

market share, gross profits, operating profits, net profits, ability to service debt, productivity, return on investments, return on assets, and utilization of capacity, (II) factors affecting domestic prices, (III) actual and potential negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment, (IV) actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and (V) in {an antidumping investigation}, the magnitude of the margin of dumping.

In addition, Section 771(7)(J) of the Act (19 U.S.C. § 1677(7)(J)) provides that—⁵

(J) EFFECT OF PROFITABILITY.—The Commission may not determine that there is no material injury or threat of material injury to an industry in the United States merely because that industry is profitable or because the performance of that industry has recently improved.

Organization of report

Part I of this report presents information on the subject merchandise, subsidy/dumping margins, and domestic like product. Part II of this report presents information on conditions of competition and other relevant economic factors. Part III presents information on the condition of the U.S. industry, including data on capacity, production, shipments, inventories, and employment. Parts IV and V present the volume of subject imports and pricing of domestic and imported products, respectively. Part VI presents information on the financial experience of U.S. producers. Part VII presents the statutory requirements and information obtained for use in the Commission's consideration of the question of threat of material injury as well as information regarding nonsubject countries.

Market summary

Paper plates are generally used as tableware for casual dinners, picnics, large formal gatherings, or any event where the plate is to be discarded after eating, including certain foodservice establishments and takeout meals. The leading U.S. producers of paper plates are ***, while leading subject producers of paper plates include *** of Thailand and

⁵ Amended by PL 114-27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.

***.^{6 7} The leading U.S. importers of paper plates from China are ***, while the leading importers of paper plates from Thailand are ***, and the leading importer of paper plates from Vietnam is ***. Leading importers of paper plates from nonsubject countries (primarily Mexico and India) include ***. U.S. purchasers of paper plates are firms that purchase paper plates from U.S. producers and U.S. importers of product; leading purchasers include ***.

Apparent U.S. consumption of paper plates totaled approximately *** paper plates (\$***) in 2023. Currently, eight firms are known to produce paper plates in the United States. U.S. producers' U.S. shipments of paper plates totaled 50.1 billion paper plates (\$2.9 billion) in 2023, and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. imports from subject sources totaled *** paper plates (\$***) in 2023 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. imports from nonsubject sources totaled *** paper plates (\$***) and accounted for *** percent of apparent U.S. consumption by quantity and by value.

Summary data and data sources

A summary of data collected in these investigations is presented in appendix C, table C-1.⁸ Except as noted, U.S. industry data are based on questionnaire responses of eight firms that accounted for the vast majority of U.S. production of paper plates during 2023. U.S. imports are based on questionnaire respondents of 26 U.S. importers of paper plates representing a *** U.S. imports of paper plates from China and *** U.S. imports of paper plates from Thailand and Vietnam.

⁶ ***.

⁷ A questionnaire response was received from only one producer in China, which reported representing *** percent of 2023 paper plate production in China.

⁸ Note: 1,000 units represent 1,000 paper plates in tables in this report.

Previous and related investigations

Paper plates have not been the subject of any prior countervailing or antidumping duty investigations in the United States.

Nature and extent of subsidies and sales at LTFV

Subsidies

On January 28, 2025, Commerce published a notice in the Federal Register of its final determinations of countervailable subsidies for producers and exporters of paper plates from China⁹ and Vietnam.¹⁰ Tables I-2 and I-3 present Commerce’s findings of subsidization of paper plates in China and Vietnam.

Table I-2
Paper plates: Commerce’s final subsidy determination with respect to imports from China

Entity	Final countervailable subsidy rate (percent)
Fuzhou Hengli Paper Co., Ltd	11.38
Jinhua P&P Product Co., Ltd	4.47
Ningbo Artcool Co., Ltd	295.08
Ningbo Fenghua Yongfa Printing Stationery Co., Ltd	295.08
Zhejiang Kingsun Eco-Pack Co., Ltd	295.08
Zhejiang Lingrong Crafts Co., Ltd	295.08
All others	10.61

Source: 90 FR 8281, January 28, 2025.

Note: For further information on programs determined to be countervailable, see Commerce’s associated Issues and Decision Memorandum.

⁹ 90 FR 8281, January 28, 2025.

¹⁰ 90 FR 8258, January 28, 2025.

Table I-3

Paper plates: Commerce’s final subsidy determination with respect to imports from Vietnam

Entity	Final countervailable subsidy rate (percent)
Go-Pak Paper Products Vietnam Co., Ltd	5.53
Innovative Sonic Vietnam International	225.90
Ningbo Changya Plastic Vietnam Company	225.90
Ningbo Changya Plastic Vietnam	225.90
SCG Vietnam	225.90
Xie Li	225.90
All others	5.53

Source: 90 FR 8258, January 28, 2025.

Note: For further information on programs determined to be countervailable, see Commerce’s associated Issues and Decision Memorandum.

Sales at LTFV

On January 28, 2025, Commerce published a notice in the Federal Register of its final determinations of sales at LTFV with respect to imports from China,¹¹ Thailand,¹² and Vietnam.¹³ Tables I-4, I-5, and I-6 present Commerce’s dumping margins with respect to imports of product from China, Thailand, and Vietnam.

Table I-4

Paper plates: Commerce’s final weighted-average LTFV margins with respect to imports from China

Exporter	Producer	Final dumping margin (percent)	Cash deposit rate (adjusted for subsidy offsets) (percent)
Guangdong Ecosource Environmental Technology Co., Ltd	Fuzhou Hengli Paper Co., Ltd	515.40	504.86
Ningbo Hongtai Package New Material Technology Co., Ltd	Fuzhou Hengli Paper Co., Ltd	515.40	504.86
Jinhua P&P Products Co., Ltd	Jinhua P&P Products Co., Ltd	267.63	267.63

¹¹ 90 FR 8271, January 28, 2025.

¹² 90 FR 8262, January 28, 2025.

¹³ 90 FR 8265, January 28, 2025.

Exporter	Producer	Final dumping margin (percent)	Cash deposit rate (adjusted for subsidy offsets) (percent)
Festa Party Products Mfy. (Zhongshan) Co., Ltd	Festa (Guangzhou) Co., Ltd	267.63	267.63
Top Printing Paper Products (Zhongshan) Co., Ltd	Festa (Guangzhou) Co., Ltd	267.63	267.63
Festa Party Products Mfy. (Zhongshan) Co., Ltd	Festa Limited	267.63	267.63
Top Printing Paper Products (Zhongshan) Co., Ltd	Festa Limited	267.63	267.63
Jieyang Weikangda Paper Co., Ltd	Fujian Putian Zhonghao Trade Co., Ltd	267.63	267.63
Dongyang Founder Paper Product Co., Ltd	Fujian Putian Zhonghao Trade Co., Ltd	267.63	267.63
Fuzhou Nicrolandee Arts & Craft Co., Ltd	Fuzhou Nicrolandee Arts & Craft Co., Ltd	267.63	267.63
Zhejiang Lanweier Paper Products Co., Ltd	Hangzhou Enli Paper Products Co. Ltd	267.63	267.63
Landward Color Printing Co., Ltd	Landward Color Printing Co., Ltd	267.63	267.63
Ningbo Hongtai Package New Material Technology Co., Ltd	Ningbo Feisuo Import & Export Co., Ltd	267.63	267.63
Ningbo Homelink Eco-Itech Co., Ltd	Ningbo Homelink Eco-Itech Co., Ltd	267.63	267.63
Ningbo Hongtai Package New Material Technology Co., Ltd	Ningbo Hongtai Package New Material Technology Co., Ltd	267.63	267.63
Ningbo Kosda New Material Technology Co., Ltd	Ningbo Kosda New Material Technology Co., Ltd	267.63	267.63
Ningbo Goldland Industry and Technology Co., Ltd	Ningbo Qtop Import & Export Co., Ltd	267.63	267.63
Zhejiang Lingrong Crafts Co., Ltd	Ningbo Qtop Import & Export Co., Ltd	267.63	267.63
Qingdao Robana Paper Product Co., Ltd	Qingdao Gold Top Trade Co. Ltd	267.63	267.63
Qingdao Wonderful Industry and Trade Co. Ltd	Qingdao Wonderful Industry and Trade Co. Ltd	267.63	267.63
Shandong Boao Package Co., Ltd	Shandong Boao Package Co., Ltd	267.63	267.63
Festa Party Products Mfy.	Xanadu Industrial Limited	267.63	267.63

Exporter	Producer	Final dumping margin (percent)	Cash deposit rate (adjusted for subsidy offsets) (percent)
(Zhongshan) Co., Ltd			
Top Printing Paper Products (Zhongshan) Co., Ltd	Xanadu Industrial Limited	267.63	267.63
Hangzhou Enli Paper Products Co., Ltd	Yeko Trading Limited	267.63	267.63
China-Wide Entity		515.40	515.40

Source: 90 FR 8271, January 28, 2025.

Table I-5
Paper plates: Commerce’s final weighted-average LTFV margins with respect to imports from Thailand

Exporter/producer	Final dumping margin (percent)
Thai Paper Co., Ltd.	5.57
Nirvana Foods & Commerce International Co., Ltd.	5.57
Pandora Production Co	5.57
SNC Cup Co., Ltd.	5.57
ABC Digital Technology Co Ltd	73.17
Beeconconscious Co	73.17
Dester Co, Ltd	73.17
Pimlapas Printing Co., Ltd	73.17
Sincerely Cargo	73.17
Thai Coconut Co Ltd	73.17
Thai Union Manufacturing Co., Ltd.	73.17
All others	5.57

Source: 90 FR 8262, January 28, 2025.

Table I-6
Paper plates: Commerce’s final weighted-average LTFV margins with respect to imports from Vietnam

Exporter	Producer	Preliminary dumping margin (percent)	Cash deposit rate (adjusted for export subsidy offset) (percent)
Go-Pak Paper Products Vietnam Co., Ltd.	Go-Pak Paper Products Vietnam Co., Ltd.	30.42	24.89
Vietnam-Wide Entity		165.27	159.74

Source: 90 FR 8265, January 28, 2025.

The subject merchandise

Commerce's scope

In the current proceeding, Commerce has defined the scope as follows:¹⁴

The merchandise subject to this investigation is certain paper plates. Paper plates subject to this investigation may be cut from rolls, sheets, or other pieces of paper and/or paper board. Paper plates subject to this investigation have a depth up to and including two (2.0) inches, as measured vertically from the base to the top of the lip, or the edge if the plate has no lip. Paper plates subject to this investigation may be uncolored, white, colored, or printed. Printed paper plates subject to this investigation may have any type of surface finish, and may be printed by any means with images, text and/or colors on one or both surfaces. Colored paper plates subject to this investigation may be colored by any method, including but not limited to printing, beater-dyeing, and dip-dyeing. Paper plates subject to this investigation may be produced from paper of any type (including, but not limited to, bamboo, straws, bagasse, hemp, kenaf, jute, sisal, abaca, cotton inters and reeds, or from non-plant sources, such as synthetic resin (petroleum)-based resins), may have any caliper or basis weight, may have any shape or size, may have one or more than one section, may be embossed, may have foil or other substances adhered to their surface, and/or may be uncoated or coated with any type of coating.

The paper plates subject to this investigation remain covered by the scope of this investigation whether imported alone, or in any combination of subject and non-subject merchandise. When paper plates subject to this investigation are imported in combination with non-subject merchandise, only the paper plates subject to this investigation are subject merchandise.

The paper plates subject to this investigation include paper plates matching the above description that have been finished, packaged, or otherwise processed in a third country by performing finishing, packaging, or processing that would not otherwise remove the merchandise from the scope of the investigation if performed in the country of manufacture of the paper plates. Examples of finishing, packaging, or other processing in a third country that would not otherwise remove the merchandise from the scope of the investigation if performed in the country of manufacture

¹⁴ 90 FR 8258, 90 FR 8262, 90 FR 8265, 90 FR 8271, and 90 FR 8281, January 28, 2025.

of the paper plates include, but are not limited to, printing, application of other surface treatments such as coatings, repackaging, embossing, and application of foil surface treatments.

Excluded from the scope of this investigation are paper plates molded or pressed directly from paper pulp (including but not limited to unfelted pulp), which are currently classifiable under subheading 4823.70.0020 of the Harmonized Tariff Schedule of the United States (HTSUS).

Also excluded from the scope of this investigation are articles that otherwise would be covered but which exhibit the following two physical characteristics: (a) depth (measured vertically from the base to the top of the lip, or edge if no lip) equal to or greater than 1.25 inches but less than two (2.0) inches, and (b) a base not exceeding five (5.0) inches in diameter if round, or not exceeding 20 square inches in area if any other shape.

Also excluded from the scope of this investigation are paper bowls, paper buckets, and paper food containers with closeable lids.

Tariff treatment

Paper plates are currently imported under statistical reporting number 4823.69.0040 of the Harmonized Tariff Schedule of the United States (“HTS”).¹⁵ The 2024 general rate of duty for subheading 4823.69.00 is “free.” Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection. Effective September 24, 2018, products covered by statistical reporting number 4823.69.0040 originating in China became subject to an additional 10 percent ad valorem duty, which was later increased to 25 percent in 2019, under Section 301 of the Trade Act of 1974.¹⁶

¹⁵ This tariff classification contains other products outside the scope of these investigations.

¹⁶ The U.S. Trade Representative imposed the tariffs under Section 301 of the Trade Act of 1974 after determining that certain acts, policies, and practices of China are unreasonable or discriminatory and burden or restrict U.S. commerce. 82 FR 40213, August 24, 2017, and 83 FR 14906, April 6, 2018. The products included in the third enumeration (“Tranche 3”) of goods produced in China are subject to additional Section 301 duties. Tranche 3 tariffs with a duty rate of 10 percent were put in place September 24, 2018 (83 FR 47974, September 21, 2018). On May 10, 2019, tranche 3 tariffs were increased to 25 percent ad valorem (84 FR 20459, May 9, 2019). If a Tranche 3 good was exported from China to the United States prior to May 10, 2019, and entered the United States prior to June 1, 2019, it was not subject to the escalated 25 percent duty (84 FR 21892, May 15, 2019). See HTS heading 9903.88.03 and U.S. notes 20 (e) and (f) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTS (2024) Rev. 10, Pub. 5569, November 2024, pp. 99-III-28, 99-III-29, 99-III-42.

The product¹⁷

Description and applications

Paper plates are used as tableware for casual dinners, picnics, large formal gatherings, or any event where the plate is to be discarded after use, including by certain foodservice establishments and for takeout meals.

Paper plates may be white (Figure I-1), colored (Figure I-2), and/or printed, and if printed, may be printed and/or laminated with images (Figure I-3), text and/or colors on one or both surfaces. Colored paper plates may be colored by, including but not limited to, printing, beater-dyeing¹⁸, and dip-dyeing. Paper plates may be produced from paper and/or paperboard¹⁹ of any type, have any thickness or basis weight, have any size or shape, have one or more sections, be fluted or unfluted, and be uncoated or have any surface finish, including but not limited to coating, laminating, cold-stamping, hot-stamping, die-cutting, and/or embossing.

Figure I-1
White paper plate



Source: Huhtamaki, <https://www.huhtamaki.com/en-us/north-america/foodservice/product-catalog/tableware/plates/6-white-uncoated-pl/>, retrieved December 3, 2024.

¹⁷ Unless otherwise noted, the information in this section is based on Paper Plates from China, Thailand, and Vietnam, Investigation Nos. 701-TA-704-705 and 731-TA-1664-1666 (Preliminary), USITC Publication 5499, March 2024.

¹⁸ Beater-dyeing is a process for making colored paper in which the dye is mixed into the raw material pulp using a beater. Paper Source, “How It’s Made: Lagoon Paper”, <https://www.papersource.com/blog/at-ps/made-lagoon-paper/>, retrieved December 11, 2024.

¹⁹ According to ISO, a paper product exceeding 200 g/m² in weight is called paperboard. “Differences between paper and paperboard,” <https://www.iggesund.com/insights/paperboard-know-how/about-paperboard/differences-between-paper-and-paperboard/>, retrieved December 12, 2024.

Figure I-2
Black paper plate



Source: Hoffmaster, <https://www.hoffmaster.com/solid-color-round-paper-platepl7096.html>, retrieved December 9, 2024.

Figure I-3
Printed paper plates



Source: Huhtamaki, <https://www.huhtamaki.com/en-us/north-america/retail/product-catalog/tableware/decorated-plates/8-58-heavy-dutyultra-plate/>, retrieved December 9, 2024.

Paper plates are sold by shape, grade, size, coating, quantity, pattern, and colors. Grades of paper plates range from uncoated “economy” or “value” plates to heavy duty paper plates, which often are colored or are decorated with a pattern. Packages of paper plates are typically sold containing only one size, pattern, color, shape, and grade. Paper plates can also be marketed by use, which can refer to a subset of paper plates within a certain size tolerance, such as round “dinner” plates measuring between 8.5 inches and 10 inches in diameter.

Manufacturing processes

The overall process of manufacturing paper plates involves feeding paperboard from master rolls into a printing press for designs and/or coatings, if necessary, then onto a forming press where plates are dye-cut and pressed into final size, shape, and form.

The paperboard used in the production of paper plates is made from mechanical pulp, chemical pulp, and/or recycled paper pulp, as well as additional fillers and additives. Most of the paperboard used for producing paper plates is from virgin paper rather than recycled paper. Pulping is the process of breaking down wood or existing paper into its individual fiber strands.

Mechanical pulping breaks the solid wood apart into wood fibers. Typically, the thermomechanical process is used, where logs are processed into small, uniformly sized chips in a woodchipper. These wood chips are then placed into refiners that use two rotating disks to apply heat and pressure to break apart the chips into fibers.

Chemical pulping breaks the wood apart into fibers using chemicals. Specifically, wood logs are chipped, then those chips are placed in a pressurized digester cooking vessel with water and chemicals to separate out cellulose fibers.

Recycled pulp takes used paper products and breaks them down into cellulose fiber strands using water, chemicals, and heat. The resulting fibers from these processes are then washed and bleached before being used to make paperboard.

The two main types of virgin paperboard used to produce paper plates are folding box board (“FBB”) and sulphate bleached stock (“SBS”). FBB is typically made from layers of mechanical pulp sandwiched between layers of bleached chemical pulp. The top layer is pigment coated. SBB is made from bleached chemical pulp, usually has a pigment coated top surface, and can also be pigment-coated on the back. SBS is denser than FBB. SBS and FBB process differently in paper plate machines; SBS runs faster, is less dusty, and the machine blades do not have to be sharpened as frequently. Thus, SBS is preferred to FBB in producing paper plates.

Once created, the wet pulp is then sprayed onto a moving mesh screen where water is removed through suction and squeegees. After nearly all the water is removed, the resulting sheet of paper is hot-rolled, pressed and squeezed into layers of paper, which are then combined and given a clay coating to provide strength, resulting in paperboard. The paperboard is then wound onto rolls and cut to a specific width. The paperboard caliper (thickness) established during this process is based on customer preferences for their paper plates.

The paperboard rolls are then delivered to paper plate plants. The paperboard rolls are converted directly into paper plates or, as an interim and optional step, printed on a large multi-deck printing press to add designs and printing. The interim step also adds coatings for strength and liquid resistance. Moreover, when printed, plates must be coated to allow for direct contact with food.

The paperboard roll is then fed into a paper plate making machine production line for conversion into paper plates. The paperboard is cut into the desired plate shape and size, and then “scored” (indentions added) for structural stability. Depending on how deep a plate is, the paperboard may be micro-scored around the edges before dye-cutting to aid in forming the plate. The cut and scored flat paper disc is then molded into the finished paper plate product. According to the petitioners, their scrap paper does not reach a waste stream and is recycled as a pulp substitute in paper mills to make more paper.

Upon completion, the finished paper plates are collated, bagged, packaged, and shipped (Figure I-4 is an example of a package of paper plates for retail sale).

Figure I-4
Packaged paper plates



Source: Dixie, <https://www.dixie.com/products/dixie-paper-plates-cups>, retrieved December 9, 2024.

Domestic like product issues

No issues with respect to domestic like product have been raised in these investigations. The petitioner proposes defining a single domestic like product consisting of paper plates coextensive with the scope of the investigations.²⁰ In the preliminary phase of these investigations, the Commission defined a single domestic like product consisting of all paper plates, coextensive with the scope.²¹ In the final phase of these investigations, no parties argued for a different domestic like product definition.

²⁰ Petitioners’ postconference brief, p. 6 and petitioners’ posthearing brief, p. 5.

²¹ Paper Plates from China, Thailand, and Vietnam, Investigation Nos. 701-TA-704-705 and 731-TA-1664-1666 (Preliminary), USITC Publication 5499, March 2024, pp. 8, 11.

Part II: Conditions of competition in the U.S. market

U.S. market characteristics

Multiple U.S. producers produce and sell paper plates, mostly to retailers. Importers of subject paper plates also sell product in the U.S. market, also mostly to retailers. Paper plates can be sold under a producer's brand or under a purchaser's private label brand.¹ U.S. producer Hoffmaster indicated that large retailer purchasers work with both domestic producers and foreign suppliers to ensure that private label designs can be quickly implemented.² The dominant U.S. producer brand is Dixie, owned by U.S. producer Georgia-Pacific, a vertically integrated producer (i.e., producing both the raw material paperboard and paper plates).³

Petitioners described paper plate demand as having increased steadily before 2020 and then increasing sharply in 2020 due to the COVID-19 pandemic, which caused many consumers to eat more meals at home. Petitioners also indicated that during the COVID-19 pandemic, health concerns and government actions caused labor constraints and supply chain disruptions, which in turn led to some raw material (paperboard) suppliers putting paper plate producers on allocation, especially in 2021. During this period, some purchasers turned to paper plate suppliers in Asia. U.S. producer Aspen Products described the U.S. paper plates market as historically not served by Asian suppliers because paperboard (the primary raw material used in paper plate production) is historically priced similarly or more expensively in Asia.⁴ Petitioners described U.S. paper plate demand as now having normalized at levels higher than prior to 2020 while paperboard supply has become plentiful, albeit at higher prices.⁵ However, purchasers continue to purchase subject imports.

Most U.S. producers (6 of 8), importers (18 of 26), and purchasers (16 of 18) indicated that the paper plates market was not subject to distinctive conditions of competition. Among the two U.S. producers reporting that there were distinct conditions, *** reported that price was the most important factor, followed by service and quality, while ***⁶ reported that low-priced imports from subject countries has "generated much more aggressive competition." The eight importers and two purchasers reporting distinct

¹ Conference transcript, pp. 46-48 (Epstein and Novak). Retailers' private labels may be supplied by multiple suppliers. Conference transcript, p. 48 (Gordon).

² Conference transcript, p. 54 (White).

³ Conference transcript, pp. 64-64 (Epstein and Biggins).

⁴ Conference transcript, pp. 55 (Biggins). See also postconference brief of Retail Industry Leaders Association, pp. 1-2.

⁵ Conference transcript, pp. 7-8 (Bay), 13-15 (Biggins), and 74 (Hoffmaster).

⁶ ***.

conditions mentioned the following as distinctive conditions of competition in the paper plates market: an increasing number of suppliers, price changes with wood pulp prices, and paper plate designs and themes. In addition, importer *** stated that marketing based on recycling claims, breadth of supplier portfolio, printing flexibility, ability to bundle with other products, custom package sizes, inventories to support demand surges, and retailer promotions are distinctive conditions of competition. It added that ***.

U.S. producers and importers were asked if there had been any changes to the product mix, range, or marketing of paper plates since January 1, 2021. Five U.S. producers and 21 importers indicated that there had been no change. Three U.S. producers and five importers indicated that there had been. U.S. producer *** indicated that there has been a demand shift away from 8.5-inch coated plates to 10-inch coated plates, as well as a demand shift away from 9-inch fluted plates. U.S. producer *** stated that there had been increase in product offerings and marketing strategies. U.S. producer *** stated that there has been substitution away from foam plates to paper plates. Importer *** stated that new Chinese suppliers have begun selling on Amazon, increasing competition “dramatically.” Importer *** described changes including new certified compostable plates, increased club store demand for larger club-pack sizes, and supply constraints causing an end to retailer consumer price promotions. Importer *** stated that it constantly creates new designs for paper plates to satisfy consumer demand. Importer *** indicated that it had moved to a *** for its product.

Apparent U.S. consumption of paper plates was virtually unchanged from 2021 to 2023, rising *** percent from 2021 to 2022 and then decreasing back to 2021 levels in 2023. It was *** percent higher in interim 2024 than in interim 2023.

U.S. purchasers

The Commission received 18 usable questionnaire responses from firms that had purchased paper plates during January 2021-June 2024.⁷ ⁸ ⁹ Fourteen responding purchasers are retailers, three are distributors, one is a restaurant chain, and two are others (***).¹⁰ The responding purchasers mostly represented the retail grocery industry. Large purchasers of paper plates include ***. Purchasers *** also submitted importers' questionnaires.

Channels of distribution

U.S. producers and importers sold paper plates mainly to retailers (table II-1), although U.S. producers were more likely to sell branded product than importers after 2021. All 12 responding purchasers (including the three distributors and two others) indicated that they did not compete with their suppliers for sales of paper plates, and most responding purchasers indicated that they either sold to end-use consumers or (less often) to wholesalers or cooperative members.

⁷ The following firms provided purchaser questionnaire responses: ***.

⁸ Of the 18 responding purchasers, 17 purchased domestic paper plates, 12 purchased imports of the subject merchandise from China, 2 (***) purchased imports of the subject merchandise from Thailand, 6 purchased subject imports from Vietnam, and 14 purchased imports of paper plates from other sources (including Bangladesh, India, Mexico, and Taiwan). ***.

⁹ Eighteen purchasers indicated they had marketing/pricing knowledge of domestic product, 15 of China product, 5 of Thai product, 9 of Vietnamese product, and 9 of product from nonsubject countries (including Cambodia, India, Malaysia, Mexico, and Taiwan).

¹⁰ ***.

Table II-1
Paper plates: Share of U.S. shipments by source, channel of distribution, branding type, and period

Shares in percent

Source	Channel	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
United States	Distributor, branded	***	***	***	***	***
United States	Distributor, private	***	***	***	***	***
United States	Retailers, branded	***	***	***	***	***
United States	Retailers, private	***	***	***	***	***
China	Distributor, branded	***	***	***	***	***
China	Distributor, private	***	***	***	***	***
China	Retailers, branded	***	***	***	***	***
China	Retailers, private	***	***	***	***	***
Thailand	Distributor, branded	***	***	***	***	***
Thailand	Distributor, private	***	***	***	***	***
Thailand	Retailers, branded	***	***	***	***	***
Thailand	Retailers, private	***	***	***	***	***
Vietnam	Distributor, branded	***	***	***	***	***
Vietnam	Distributor, private	***	***	***	***	***
Vietnam	Retailers, branded	***	***	***	***	***
Vietnam	Retailers, private	***	***	***	***	***
Subject sources	Distributor, branded	***	***	***	***	***
Subject sources	Distributor, private	***	***	***	***	***
Subject sources	Retailers, branded	***	***	***	***	***
Subject sources	Retailers, private	***	***	***	***	***
Nonsubject sources	Distributor, branded	***	***	***	***	***
Nonsubject sources	Distributor, private	***	***	***	***	***
Nonsubject sources	Retailers, branded	***	***	***	***	***
Nonsubject sources	Retailers, private	***	***	***	***	***
All import sources	Distributor, branded	***	***	***	***	***
All import sources	Distributor, private	***	***	***	***	***
All import sources	Retailers, branded	***	***	***	***	***
All import sources	Retailers, private	***	***	***	***	***

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

Note: "Distributor" includes food service companies. "Retailers" includes end users and restaurants. "Private" refers to private label sales.

Geographic distribution

U.S. producers and importers generally reported selling paper plates to all regions in the United States (table II-2). For the eight U.S. producers, *** percent of sales were within 100 miles of their production facility, *** percent were between 101 and 1,000 miles, and *** percent were over 1,000 miles. Importers sold *** percent within 100 miles of their U.S. point of shipment, *** percent between 101 and 1,000 miles, and *** percent over 1,000 miles.

Table II-2**Paper plates: Count of U.S. producers' and U.S. importers' geographic markets**

Region	U.S. producers	China	Thailand	Vietnam	Subject sources
Northeast	8	19	3	10	21
Midwest	8	20	3	10	22
Southeast	8	19	3	10	21
Central Southwest	8	20	3	10	22
Mountain	8	18	2	10	20
Pacific Coast	8	21	3	10	23
Other	6	14	1	6	14
All regions (except Other)	8	18	2	10	20
Reporting firms	8	23	3	10	25

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

Note: Other U.S. markets include AK, HI, PR, and VI.

Supply and demand considerations

U.S. supply

Table II-3 provides a summary of the supply factors regarding paper plates from U.S. producers and from subject countries. Responding producers in all four countries reported an increase in capacity for the production of paper plates between 2021 and 2023. All three subject countries saw an increase in their capacity utilization, with Vietnam seeing the greatest increase in capacity utilization. The United States, however, saw a fall in capacity utilization despite a growth in overall capacity between 2021 and 2023.

Table II-3
Paper plates: Supply factors that affect the ability to increase shipments to the U.S. market, by country

Quantity in 1,000 units; ratio and share in percent

Factor	Measure	United States	China	Thailand	Vietnam
Capacity 2021	Quantity	73,350,403	***	***	***
Capacity 2023	Quantity	82,066,293	***	***	***
Capacity utilization 2021	Ratio	71.8	***	***	***
Capacity utilization 2023	Ratio	59.8	***	***	***
Inventories to total shipments 2021	Ratio	7.1	***	***	***
Inventories to total shipments 2023	Ratio	9.4	***	***	***
Home market shipments 2023	Share	99.6	***	***	***
Non-US export market shipments 2023	Share	0.4	***	***	***
Ability to shift production (firms reporting “yes”)	Count	5 of 8	***	***	***

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

Note: Responding U.S. producers accounted for the vast majority of U.S. production of paper plates in 2023. Responding foreign producer/exporter firms accounted for a very small share of Chinese and Vietnamese production of paper plates during 2023, but most Thai production of paper plates. For additional data on the number of responding firms and their share of U.S. production and of U.S. imports from each subject country, please refer to Part I, “Summary Data and Data Sources.”

Domestic production

Based on available information, U.S. producers of paper plates have the ability to respond to changes in demand with large changes in the quantity of shipments of U.S.-produced paper plates to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity and inventories, and some ability to shift production to or from alternate products. Factors mitigating responsiveness of supply include limited ability to shift shipments from alternate markets.

Subject imports from China

Limited information is available on the paper plates industry in China (see Part VII). One *** Chinese producer and one reseller that exports paper plates to the United States provided a response to the Commission’s questionnaire. As shown in Part VII, China is a large exporter to markets other than the United States of the broader 6-digit HS category covering paper plates (4823.69), suggesting Chinese producers may have a large ability to

increase shipments of paper plates to the U.S. market. At the conference, petitioners indicated that Chinese producers may also be opening affiliate production facilities in Thailand and Vietnam.¹¹ Additionally, petitioners described the Chinese government as subsidizing Chinese paper plate exports.¹²

Subject imports from Thailand

Based on available information, producers of paper plates from Thailand have the ability to respond to changes in demand with large changes in the quantity of shipments of paper plates to the U.S. market. One Thai producer responded to the Commission's questionnaire. The main contributing factors to this degree of responsiveness of supply include ***, and U.S. imports of Thai paper plates went from ***, suggesting an ability to increase shipments to the U.S. market through increases in capacity.¹³

Subject imports from Vietnam

Based on available information, producers of paper plates from Vietnam have the ability to respond to changes in demand with moderate-to-large changes in the quantity of shipments of paper plates to the U.S. market. One Vietnamese producer, Go-Pak, responded to the Commission's questionnaires. The main contributing factor to this degree of responsiveness of supply is the ***. Moreover, Vietnamese shipments to the U.S. market increased by over *** times in the same period. Additionally, petitioners described the Vietnamese government as subsidizing Vietnamese paper plate exports.¹⁴ These points suggest that Vietnamese producers have the ability to add capacity and increase shipments to the U.S. market.

¹¹ Conference transcript pp. 58-59 (Novak, Gordon).

¹² Petitioners' prehearing report, p. 53.

¹³ These trends are even higher than trends based on 2022 data, such as those used in the preliminary-phase staff report.

¹⁴ Petitioners' prehearing brief, pp. 52-53.

Imports from nonsubject sources

Nonsubject imports accounted for a very small share (for example, *** percent in 2023) of total reported imports during the period. (See Part IV).

Supply constraints

At the conference, petitioners described the COVID-19 pandemic as causing disruptions to their production because of labor constraints, health concerns, government restrictions on production, and the inability of their raw material (paperboard) suppliers to supply sufficient paperboard.¹⁵ U.S. producer Aspen Products indicated that during the COVID-19 pandemic, it tried to acquire paperboard from Asia, but learned that Asian paperboard suppliers were experiencing the same production difficulties as U.S. paperboard suppliers.¹⁶

U.S. producers and importers were asked to describe any supply constraints they experienced between January 2021 until January 25, 2024 (before the filing of the petition in these investigations); and since January 25, 2024 (after the filing of the petition). Additionally, purchasers were asked if any of their suppliers had experienced constraints during the same periods. Firms' responses are summarized in table II-4 and the discussion following.

Table II-4
Paper plates: Count of responding firms' responses regarding timing of supply constraints, by firm type

Count in number of firms indicating that there were supply constraints out of all firms responding to the question for that period.

Firm type	Source	2021	2022	2023	January 1 – January 25, 2024	January 25, 2024 – present
U.S. producers	Domestic	7 of 7	7 of 7	3 of 7	1 of 7	1 of 7
Importers	Imported	4 of 24	5 of 24	3 of 24	5 of 24	8 of 23
Purchasers	Domestic	13 of 17	13 of 17	2 of 18	1 of 17	1 of 16
Purchasers	Imported	2 of 17	2 of 17	0 of 18	0 of 17	0 of 16

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

¹⁵ Conference transcript, pp. 14-17 (Biggins) and 75 (Epstein and Novak).

¹⁶ Conference transcript, pp. 13-14 (Biggins), 16-17 (Novak), 55-56 (Biggins), 75 (Epstein), and 75-76 (Novak).

2021

Most U.S. producers and purchasers experienced supply constraints in 2021. Specifically, 7 U.S. producers, 4 importers and 13 purchasers¹⁷ indicated that they had experienced supply constraints. Twenty importers and three purchasers indicated that they did not experience any supply constraints in 2021.

Among firms experiencing supply constraints, U.S. producers reported that in 2021 customers were placed on allocations and new customers could not be accepted due to supply shortages. Most U.S. producers (***) noted that the supply shortages came from constraints in the raw materials (paperboard) market. Two producers (***) indicated that their supply shortages were driven by volatility, disruptions, and wage increases they faced in their labor force.

Two importers (***) described constraints in acquiring U.S.-produced paper plates. Importer *** described having difficulty obtaining space on ocean carrier ships. Importer *** stated that it received feedback from customers that its prices were too high and declined to reduce prices. It added that it also had experienced supply constraints.

Nine purchasers described supply constraints (including being placed on allocation) with AJM Packaging, four with Georgia-Pacific, two with Dart Container, and one each with Aspen Products, Hoffmaster, and Unique Industries. Some purchasers attributed the supply constraints to the COVID-19 pandemic and paperboard shortages.

2022

For the year 2022, again most U.S. producers and purchasers described supply constraints. Specifically, 7 U.S. producers, 5 importers, and 13 purchasers indicated that they had experienced supply constraints. Nineteen importers and three purchasers indicated that they did not experience any supply constraints in 2022.

Similar to their responses for 2021, U.S. producers indicated that in 2022 customers were placed on allocations and new customers could not be accepted due to supply shortages. Four producers (***) reported that constraints in the paperboard market continued to drive supply shortages of paper plates in 2022. Two producers (***), however, noted that customer

¹⁷ Two purchasers, ***, indicated that they experienced supply constraints with foreign supply. *** stated that, as a result, ***.

allocations and supply constraints persisted only until mid-2022, lessening particularly between mid-2022 and mid-2023.

Three importers (***) described constraints in acquiring U.S.-produced paper plates, with *** indicating that the problem had been with *** and has since been resolved. *** described the same constraints as they experienced in 2021.

Eight purchasers indicated that they had experienced 2022 supply constraints with AJM Packaging, three with Georgia-Pacific, two with Dart Container, two with Aspen Products, and one each with Hoffmaster and Unique Industries. Purchasers again attributed these constraints mostly to lingering supply chain problems from the COVID-19 pandemic.

2023

For the year 2023, fewer firms reported supply constraints. Three U.S. producers and 3 importers indicated that they had experienced supply constraints. Twenty-one importers and 16 purchasers indicated that they did not experience any supply constraints in 2023.

By 2023, two of the three U.S. producers who indicated they faced supply constraints in 2023 noted that their constraints began to resolve as market normalization returned; one producer *** reported supply constraints ending by March 2023, while the second producer *** reported its constraints and disruptions resolved by the end of 2023. However, U.S. producer *** reported that it faced supply constraints in the fourth quarter of 2023 due to unplanned higher demand and had to consequently ***.

Importer *** described the constraints it experienced in 2021 as lessening from the middle of 2022 to the middle of 2023, with all constraints gone by late 2023. *** indicated that the manufacturer from which it imported could no longer support demand. *** described the same constraints as they experienced in 2020 and 2021. Purchaser *** stated that ***.

2024

For the period between January 1 and January 25, 2024, 19 importers and 16 purchasers indicated that they did not experience any supply constraints. However, one U.S. producer, five importers, and one purchaser (***) indicated that they had experienced supply constraints between January 1 and January 25, 2024.

The only U.S. producer (***) to report supply constraints between January 1 and January 25, 2024, explained that ***. Importers reporting supply constraints cited the same reasons they had in earlier years or general problems with suppliers.¹⁸

For the period since January 25, 2024, 15 importers and 15 purchasers indicated that they did not experience any supply constraints. However, one U.S. producer, eight importers, and one purchaser (***) indicated that they had experienced supply constraints after January 25, 2024.

The only U.S. producer (***) to report supply constraints since January 25, 2024, indicated that it has a few items on allocation, but did not provide an explanation or further clarification as to the cause behind it. Among importers reporting constraints, *** stated that it had to pivot its supply chain outside of China, causing fines and forced discounts from customers. *** described having difficulty finding new suppliers. The other importers with supply constraints cited the same issues as they had for previous years or general problems with suppliers. Purchaser *** stated that ***.

Availability of supply

Purchasers were also asked if the availability of domestic paper plates, subject imports, or nonsubject imports had changed since January 1, 2021. Thirteen purchasers indicated that they had experienced changes in the availability of U.S. supply, and five indicated that they had not. On the other hand, for both subject and nonsubject imports, 12 purchasers indicated that they had not experienced changes in availability. Three purchasers indicated that they had, for subject imports (and not for nonsubject imports).

In additional comments, eight purchasers¹⁹ described U.S. producers as having issues with the availability of paper plates during the COVID-19 pandemic and into 2022. For example, *** indicated that it experienced shortages of supply from *** that caused *** to lose consumer sales, but that these issues were resolved by January 1, 2023. Four purchasers indicated that the U.S. producers' shortages were due to shortages of paperboard

¹⁸ One of these importers cited these investigations, which had not yet begun.

¹⁹ These eight purchasers are ***.

or raw materials. Additionally, *** stated that U.S. producers do not supply certain types of paper plates (e.g., particular colors, designs, and shapes). *** stated that consumer demand had decreased.

Purchasers had fewer comments on the availability of subject imports. *** described availability as improving due to easing of freight costs and more availability of raw materials since the end of the COVID-19 pandemic. *** described subject import availability as inconsistent. *** described subject imports as steadily available, and *** indicated that subject import supply had increased.

New suppliers

Twelve of 18 purchasers indicated that no new suppliers entered the U.S. market since January 1, 2021. Six purchasers named new suppliers. Two of these purchasers named importer Acadian Crossing, and two named Mexican producers. Purchaser *** named six foreign producers in China, Indonesia, Mexico, and Vietnam, and described these firms as entering during the COVID-19 pandemic when U.S. producers were placing customers on allocation.

U.S. demand

Based on available information, the overall demand for paper plates is likely to experience moderate changes in response to changes in price. Factors supporting a larger change are the availability of substitute products (although some consumers have environmental concerns over some substitutes) and the nature of paper plates as having somewhat seasonal demand and not being a necessity for consumers. However, paper plates also represent a small cost of an entire meal, lessening the demand response to changes in price.²⁰

End uses

Paper plates are generally an end use consumer product, used typically for holding food during consumption and then discarding the paper plate. However, paper plates may also be used for the same purpose in restaurants and institutions. Petitioners noted that paper plates

²⁰ The prehearing staff report estimated that the elasticity of demand for paper plates was moderate-to-large. This estimate has been changed with the addition of information and analysis, especially the relative cost of a paper plate compared to an entire meal, as provided in Petitioners' prehearing brief, p. 17.

are usually a small cost (for example, 4.3 cents per plate) relative to the cost of an entire meal.²¹

Business cycles

Most (6 of 8) responding U.S. producers, a majority (16 of 26) of responding importers, and a majority (12 of 18) purchasers indicated that the market was subject to business cycles, usually based on major holidays. The six U.S. producers indicated that the paper plates market was subject to seasonal demand and sales trends, with increases in sales and demand for paper plates occurring during the summer. Five of those six U.S. producers noted that demand for paper plates also increases around the holidays, especially in November and December. One producer (***) also noted that business cycles for paper plates is counter-cyclical during economic downturns as consumers shift towards discount stores. Two U.S. producers (***) noted that holiday celebrations and/or retailer product reviews were lower during the COVID-19 pandemic, with *** adding that demand was trending back toward pre-COVID-19 pandemic levels. Twelve purchasers indicated that “holidays” and summer are periods of higher demand, with “holidays” including not only Thanksgiving and Christmas but also the Super Bowl, Valentine’s Day, and Halloween. Five importers *** described holidays as periods of greater demand for paper plates with specialty designs and/or indicated that they shifted their specialty designs based on holiday promotions. *** indicated that commodity paper plates are not subject to business cycles but that specialty paper plates have business cycles associated with seasonal holidays.

Demand trends

Most U.S. producers reported an increase in U.S. demand for paper plates since January 1, 2021 (table II-5), while importers were roughly split between those noting an increase and those describing no change. Purchasers mostly described a decrease in demand.

²¹ Petitioners’ prehearing brief, p. 17.

Table II-5
Paper plates: Count of firms' responses regarding overall domestic and foreign demand, by firm type

Count in number of firms reporting

Market	Firm type	Steadily Increase	Fluctuate Up	No change	Fluctuate Down	Steadily Decrease
Domestic demand	U.S. producers	5	3	0	2	0
Domestic demand	Importers	5	5	10	3	3
Domestic demand	Purchasers	1	4	2	7	4
Foreign demand	U.S. producers	2	0	0	0	0
Foreign demand	Importers	3	0	6	0	1
Foreign demand	Purchasers	0	0	0	2	0

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

Note: ***.

In additional comments, two U.S. producers noted that U.S. domestic demand for paper plates trended upwards during the COVID-19 pandemic due to increased food consumption at home, but after the pandemic, demand has come down as the lockdown dynamic reversed. Three producers, however, indicated that domestic demand has increased as consumers, retailers, and legislators look to shift away from foam and plastic plates, opting for more sustainable products instead. Two other producers described demand as growing somewhat due to consumer disposable income, convenience, and affordability.

Among importers, *** reported that according to ***, paper plate consumption trends were as follows: a 1.7 percent increase from 2020 to 2021 (due to the COVID-19 pandemic); a 9.3 percent decrease from 2021 to 2022 (due to supply constraints); and a 0.4 percent decrease from 2022 to 2023 (***). *** described demand as increasing during the COVID-19 pandemic due to increased food consumption at home, but levelling off after the pandemic. Other importers described demand as affected by consumer substitution away from foam plates, by seasonal demand changes, by retail macroeconomic conditions, by growth in specific markets (such as ***), and by the COVID-19 pandemic.

Regarding foreign demand for paper plates, two U.S. producers (including ***) noted that environmental pressures, particularly the ban on plastic and foam plates in European nations, Australia, and other countries, has affected foreign demand for paper plates.

Among purchasers, *** described demand as either rising during the COVID-19 pandemic, decreasing after that, or

both. Other purchasers described demand increases or decreases specific to their firm, e.g., opening new locations or demand growth in their region of the country (e.g., ***). *** described decreased demand due to consumer pullbacks, inflation, or overall economic conditions.

Substitute products

Eight U.S. producers, 11 importers, and 12 purchasers reported that there were substitutes for paper plates, while 14 importers and 5 purchasers stated that there were not. Producers listed plastic plates, foam plates, and fiber plates as substitutes for paper plates. U.S. producers describe changes in the price of these substitutes as having no effect on the prices of paper plates. Plastic plates and fiber plates are priced at a premium to paper plates, while foam plates are priced lower due to lower functionality when compared to paper plates (i.e., not cut resistance or microwave safe). Plastic plates and foam plates also face environmental concerns among consumers, while fiber plates are priced to target environmentally conscious consumers.

Importers and purchasers listed plastic, molded fiber, ceramic, and foam plates as substitutes. Like U.S. producers, importers and purchasers described changes in the price of these substitutes as having limited or no effect on the prices of paper plates because either the substitutes (such as plastic) are more expensive than paper plates or the substitutes (such as foam) are not suitable for microwave uses and have perceived environmental problems, resulting in consumer reticence or government regulation. Purchaser *** stated that an increase in the pricing of fiber plates had shifted consumer preferences toward paper plates.

Substitutability issues

This section assesses the degree to which U.S.-produced paper plates and imports of paper plates from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of paper plates from domestic and imported sources based on those factors. Based on available data, staff believes that there is a moderate-to-high degree of substitutability between domestically produced paper plates and paper plates imported from subject sources.²² A majority of U.S. producers, importers, and

²² The degree of substitution between domestic and imported paper plates depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced paper plates to the paper plates imported from subject countries (or vice versa) when prices change. The degree of substitution may include such factors as quality differences (e.g., grade standards, defect rates, etc.), and differences in sales

(continued...)

purchasers described paper plates from different sources as always or frequently interchangeable. Nonetheless, some importers and purchasers described some factors other than price, particularly design features such as stamping, foil printing, shape, and die cut, as important and at least sometimes a reason why they imported or purchased subject paper plates rather than purchase U.S. paper plates.

Factors affecting purchasing decisions

Purchaser decisions based on source

As shown in table II-6, most purchasers and their customers never make purchasing decisions based on the producer or country of origin. Those purchasers responding that they at least sometimes base decisions on producer described reasons why they do so, reasons including quality standards, customer demand, pricing, design, supplier relationship, timely delivery, service, and supplier capacity. *** added that foreign suppliers do not have the same minimum quantity requirements that domestic suppliers do. The few purchasers that indicated that their customers make decisions based on producer described some consumers as being brand oriented. Regarding why some purchasers indicated they may at least sometimes make decisions based on country of origin, purchasers described lead times, supplier capacity, consumer demand, logistics, quality, and a preference for domestic product, especially on patriotic-themed plates. *** elaborated that shipping times were shorter for domestic product, but that the most important factor was the ability to make the plates it demanded. Purchasers that indicated their customers made decisions based on country of origin stated that their customers did so preferring patriotic-themed plates made in the United States.

Table II-6

Paper plates: Count of purchasers' responses regarding frequency of purchasing decisions based on producer and country of origin

Count in number of firms reporting

Firm making decision	Decision based on	Always	Usually	Sometimes	Never
Purchaser	Producer	1	1	7	9
Customer	Producer	1	0	3	12
Purchaser	Country	0	1	6	11
Customer	Country	0	1	3	12

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

conditions (e.g., lead times between order and delivery dates, reliability of supply, product services, etc.).

Importance of purchasing domestic product

Seventeen purchasers reported that all of their purchases did not require purchasing U.S.-produced product. *** stated that 85 percent of its purchases are required by its customers to be domestic product.

Twelve of 18 purchasers indicated that neither they nor their customers prefer to order paper plates from a specific country over other sources of supply. Six stated that they did, with five of those citing some customers' (or its customers' customers') preferences for U.S. product, for reasons including lower delivery costs, speed of delivery, and/or supply chain challenges with imports. *** added that its customers prefer to buy U.S. product, but that price is ultimately more important than U.S. origin. *** stated that it prefers ***.

Thirteen of 17 responding purchasers indicated that there are not certain colors/sizes/shapes/printing styles of paper plates that are only available from certain country sources. One of those 13, ***, added that some U.S. suppliers ***. Four purchasers indicated that some grades are only available from a single source, with all four citing foil printing as not available from all suppliers, especially U.S. suppliers, or available particularly from China. *** added that design features such as shine, holographic prints, and shaped plates are not available from U.S. suppliers, and *** stated that stamping and die cut products are not.

Most important purchase factors

The most often cited top three factors firms consider in their purchasing decisions for paper plates were price (14 firms), quality (13 firms), and availability (12 firms), as shown in table II-7. Price and quality were the most frequently cited first-most important factors (cited by 4 firms each), followed by availability. In addition to the responses in the table, *** stated that for commodity paper plates, the major factors are first, quality; second, cost; and third reliability. It continued that for party/occasional plates, the major factors are first, design and quality; second, cost; and third, reliability.

Table II-7
Paper plates: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor

Count in number of firms reporting

Factor	First	Second	Third	Total
Price/cost	4	5	5	14
Quality	4	6	3	13
Availability/capacity/supply	4	4	4	12
Product line/range/design/embellishment	2	1	0	3
Service	1	2	0	3
Traditional supplier	0	0	2	2
Customer demand	1	0	0	1

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

Note: Other factors (listed after the top three) include domestic distribution system as well as the factors listed above.

Note: *** responses are not included above, but are summarized in the paragraph above.

Note: Purchasers described quality as based on numerous factors including durability, leakage, size, strength, thickness, soak-through performance, microwaveability, color, oil penetration, and compliance with government regulations.

Nine purchasers reported that they sometimes purchase the lowest-priced product, while six indicated they usually do, and three indicated they never do.

Importance of specified purchase factors

Purchasers were asked to rate the importance of 15 factors in their purchasing decisions (table II-8). Seventeen purchasers rated availability and reliability as very important, 16 reported that consistency was, 14 reported quality meeting industry standards was, and 14 indicated that delivery time was. Price was listed as very important by 12 purchasers.

Table II-8**Paper plates: Count of purchasers' responses regarding importance of purchase factors, by factor**

Factor	Very important	Somewhat important	Not important
Availability	17	1	0
Delivery terms	11	7	0
Delivery time	14	4	0
Discounts offered	4	12	2
Minimum quantity requirements	13	2	3
Packaging	8	9	1
Payment terms	6	12	0
Price	12	6	0
Product consistency	16	1	0
Product range	6	11	1
Quality meets industry standards	14	4	0
Quality exceeds industry standards	4	12	2
Reliability of supply	17	1	0
Technical support/service	4	10	4
U.S. transportation costs	4	10	4

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

Lead times

Paper plates are primarily produced-to-order. U.S. producers reported that *** percent of their commercial shipments were produced-to-order, with lead times averaging *** days. The remaining *** percent of their commercial shipments came from inventories, with lead times averaging *** days. Importers reported that *** percent of their commercial orders came from U.S. inventories, with lead times averaging *** days. The remaining *** percent were produced to order, with lead times averaging *** days.

Supplier certification

Ten of 18 responding purchasers require their suppliers to become certified or qualified to sell paper plates to their firm. Purchasers reported that the time to qualify a new supplier usually ranged from 30 to 90 days.²³ Purchasers indicated that qualification procedures can include social compliance audits (e.g., forestry and recycling certifications), capacity audits, specification reviews, plant audits, quality reviews, testing, and financial audits. Seventeen purchasers reported that no domestic or foreign supplier had failed in its attempt to qualify paper plates, or had lost its approved status since 2021. However, *** indicated that a *** producer had not yet ***.

²³ One purchaser, ***, indicated that qualification could take one year.

Minimum quality specifications

As can be seen from table II-9, a majority of responding purchasers reported that domestic paper plates and subject imports from China always or usually met minimum quality specifications. However, most purchasers did not know about the ability of Thai and Vietnamese suppliers to meet such specifications.

Table II-9
Paper plates: Count of purchasers' responses regarding suppliers' ability to meet minimum quality specifications, by source

Source of purchases	Always	Usually	Sometimes	Rarely or never	Don't Know
United States	8	8	1	0	1
China	6	4	1	0	7
Thailand	2	3	0	0	13
Vietnam	5	3	0	0	9
Nonsubject sources	2	0	1	0	10

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

Note: Purchasers were asked how often domestically produced or imported paper plates meets minimum quality specifications for their own or their customers' uses.

Note: Nonsubject sources in this table refer to imports from Cambodia, India, and Malaysia.

Changes in purchasing patterns

Twelve purchasers reported that they had changed suppliers since January 1, 2021, while six reported that they had not. Among those purchasers reporting changes, *** stated that it changed due to unavailable supplies from domestic producers. *** stated that it added suppliers due to demand exceeding its suppliers' capacity during the COVID-19 pandemic. *** reported adding *** in 2023. *** reported adding ***. *** reported that its supplier changes were based on trying to keep up with demand, and *** indicated that it added Chinese producers due to seasonal requirements and those suppliers' design capabilities.

Purchasers were also asked about changes in their purchasing patterns from different countries since January 1, 2021 (table II-10). A plurality of purchasers reported decreased purchases of U.S.-produced product, although some purchasers also reported increases and no

changes. Purchasers reported a wide variety of changes in their purchases of Chinese product and general increases in their purchases of Vietnamese product. Few (three) purchasers reported purchases of Thai product.

Overall, most purchaser responses described all or part of a history in which purchasers purchased more subject (especially Chinese) imports during the COVID-19 pandemic when U.S. producers were putting purchasers on allocation but demand for paper plates was rising (for most, but not all, purchasers). After the COVID-19 pandemic’s end, there has been both a reported reduction in demand and a restoration of U.S. supply. (Individual purchaser responses may have only fit parts of this overall history). Additionally, *** described the above narrative as fitting commodity paper plates, but added that it needed to purchase paper plates with specialty designs from subject countries. *** indicated that it purchased its Vietnamese plates ***.

Table II-10
Paper plates: Count of purchasers’ responses regarding changes in purchase patterns from U.S., subject, and nonsubject countries

Count in number of firms reporting

Source of purchases	Steadily Increase	Fluctuate Up	No change	Fluctuate Down	Steadily Decrease	Did not purchase
United States	1	5	6	6	3	0
China	2	5	2	3	4	2
Thailand	1	1	0	1	0	11
Vietnam	4	3	1	1	0	6
Nonsubject sources	1	1	1	2	3	6
Sources unknown	0	0	0	0	1	7

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

Note: Purchaser *** reported that its purchases from U.S. sources fluctuated up, fluctuated down, and were unchanged, and that its purchases from Vietnam steadily increased and were unchanged, all depending on time period.

Purchase factor comparisons of domestic products, subject imports, and nonsubject imports

Purchasers were asked a number of questions comparing paper plates produced in the United States, subject countries, and nonsubject countries. First, purchasers were asked for a country-by-country comparison on the same 15 factors (table II-11) for which they were asked to rate the importance. In comparing U.S. and Chinese product, a majority of purchasers generally described U.S. and Chinese product as interchangeable on most factors, except for delivery time (in which a majority described U.S. product as superior) and price (in which an equal number of purchasers described U.S. product as comparable and inferior). Few purchasers made comparisons of Thai product with any product from any other source, and the

limited comparisons of U.S. and Thai product showed a wide variety of results. In comparing U.S. and Vietnamese product, a majority of purchasers responded that U.S. and Vietnamese product were comparable in most factors. However, a plurality also found that U.S. product was superior to Vietnamese product in delivery time, and purchasers were evenly split on whether U.S. product was comparable or inferior to Vietnamese product in availability, price, and reliability of supply. Majorities of purchasers also generally reported that subject product from different countries was comparable in most factors.

Table II-11
Paper plates: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Count in number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. China	0	11	3
Delivery terms	U.S. v. China	5	8	1
Delivery time	U.S. v. China	9	4	1
Discounts offered	U.S. v. China	1	11	1
Minimum quantity requirements	U.S. v. China	3	7	2
Packaging	U.S. v. China	1	13	0
Payment terms	U.S. v. China	2	12	0
Price	U.S. v. China	2	6	6
Product consistency	U.S. v. China	1	13	0
Product range	U.S. v. China	1	8	4
Quality meets industry standards	U.S. v. China	1	13	0
Quality exceeds industry standards	U.S. v. China	3	8	1
Reliability of supply	U.S. v. China	1	12	1
Technical support/service	U.S. v. China	3	9	1
U.S. transportation costs	U.S. v. China	4	9	0

Table continued.

Table II-11 Continued**Paper plates: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Count in number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. Thailand	1	1	1
Delivery terms	U.S. v. Thailand	1	1	1
Delivery time	U.S. v. Thailand	2	0	1
Discounts offered	U.S. v. Thailand	0	2	0
Minimum quantity requirements	U.S. v. Thailand	0	2	0
Packaging	U.S. v. Thailand	0	3	0
Payment terms	U.S. v. Thailand	0	3	0
Price ¹	U.S. v. Thailand	1	1	1
Product consistency	U.S. v. Thailand	0	3	0
Product range	U.S. v. Thailand	0	2	1
Quality meets industry standards	U.S. v. Thailand	0	3	0
Quality exceeds industry standards	U.S. v. Thailand	0	2	0
Reliability of supply	U.S. v. Thailand	1	1	1
Technical support/service	U.S. v. Thailand	1	1	0
U.S. transportation costs	U.S. v. Thailand	2	0	0

Table continued.

Table II-11 Continued**Paper plates: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Count in number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. Vietnam	0	4	4
Delivery terms	U.S. v. Vietnam	2	5	1
Delivery time	U.S. v. Vietnam	4	3	1
Discounts offered	U.S. v. Vietnam	0	7	0
Minimum quantity requirements	U.S. v. Vietnam	0	5	2
Packaging	U.S. v. Vietnam	0	8	0
Payment terms	U.S. v. Vietnam	0	6	2
Price	U.S. v. Vietnam	0	4	4
Product consistency	U.S. v. Vietnam	0	8	0
Product range	U.S. v. Vietnam	0	5	3
Quality meets industry standards	U.S. v. Vietnam	0	8	0
Quality exceeds industry standards	U.S. v. Vietnam	1	5	1
Reliability of supply	U.S. v. Vietnam	0	4	4
Technical support/service	U.S. v. Vietnam	0	6	1
U.S. transportation costs	U.S. v. Vietnam	0	4	3

Table continued.

Table II-11 Continued**Paper plates: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Count in number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. Nonsubject	0	3	1
Delivery terms	U.S. v. Nonsubject	1	2	1
Delivery time	U.S. v. Nonsubject	2	1	1
Discounts offered	U.S. v. Nonsubject	0	2	0
Minimum quantity requirements	U.S. v. Nonsubject	0	3	0
Packaging	U.S. v. Nonsubject	0	4	0
Payment terms	U.S. v. Nonsubject	0	3	1
Price	U.S. v. Nonsubject	0	1	3
Product consistency	U.S. v. Nonsubject	0	4	0
Product range	U.S. v. Nonsubject	0	3	1
Quality meets industry standards	U.S. v. Nonsubject	0	4	0
Quality exceeds industry standards	U.S. v. Nonsubject	1	1	1
Reliability of supply	U.S. v. Nonsubject	0	2	2
Technical support/service	U.S. v. Nonsubject	0	3	0
U.S. transportation costs	U.S. v. Nonsubject	0	2	1

Table continued.

Table II-11 Continued**Paper plates: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Count in number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	China v. Thailand	0	1	0
Delivery terms	China v. Thailand	0	1	0
Delivery time	China v. Thailand	0	1	0
Discounts offered	China v. Thailand	0	1	0
Minimum quantity requirements	China v. Thailand	0	1	0
Packaging	China v. Thailand	0	1	0
Payment terms	China v. Thailand	0	1	0
Price	China v. Thailand	0	1	0
Product consistency	China v. Thailand	0	1	0
Product range	China v. Thailand	0	1	0
Quality meets industry standards	China v. Thailand	0	1	0
Quality exceeds industry standards	China v. Thailand	0	1	0
Reliability of supply	China v. Thailand	0	1	0
Technical support/service	China v. Thailand	0	1	0
U.S. transportation costs	China v. Thailand	0	1	0

Table continued.

Table II-11 Continued**Paper plates: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Count in number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	China v. Vietnam	0	4	0
Delivery terms	China v. Vietnam	0	4	0
Delivery time	China v. Vietnam	0	4	0
Discounts offered	China v. Vietnam	0	4	0
Minimum quantity requirements	China v. Vietnam	0	4	0
Packaging	China v. Vietnam	0	4	0
Payment terms	China v. Vietnam	0	4	0
Price	China v. Vietnam	0	4	0
Product consistency	China v. Vietnam	0	4	0
Product range	China v. Vietnam	0	4	0
Quality meets industry standards	China v. Vietnam	0	4	0
Quality exceeds industry standards	China v. Vietnam	0	4	0
Reliability of supply	China v. Vietnam	0	4	0
Technical support/service	China v. Vietnam	0	4	0
U.S. transportation costs	China v. Vietnam	0	4	0

Table continued.

Table II-11 Continued**Paper plates: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Count in number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	China v. Nonsubject	1	2	0
Delivery terms	China v. Nonsubject	0	3	0
Delivery time	China v. Nonsubject	0	2	1
Discounts offered	China v. Nonsubject	0	3	0
Minimum quantity requirements	China v. Nonsubject	0	3	0
Packaging	China v. Nonsubject	0	3	0
Payment terms	China v. Nonsubject	0	3	0
Price	China v. Nonsubject	0	3	0
Product consistency	China v. Nonsubject	0	3	0
Product range	China v. Nonsubject	1	2	0
Quality meets industry standards	China v. Nonsubject	0	3	0
Quality exceeds industry standards	China v. Nonsubject	0	3	0
Reliability of supply	China v. Nonsubject	1	2	0
Technical support/service	China v. Nonsubject	0	3	0
U.S. transportation costs	China v. Nonsubject	0	3	0

Table continued.

Table II-11 Continued**Paper plates: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Count in number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	Thailand v. Vietnam	0	2	0
Delivery terms	Thailand v. Vietnam	0	2	0
Delivery time	Thailand v. Vietnam	0	2	0
Discounts offered	Thailand v. Vietnam	0	2	0
Minimum quantity requirements	Thailand v. Vietnam	0	2	0
Packaging	Thailand v. Vietnam	0	2	0
Payment terms	Thailand v. Vietnam	0	2	0
Price	Thailand v. Vietnam	0	2	0
Product consistency	Thailand v. Vietnam	0	2	0
Product range	Thailand v. Vietnam	0	2	0
Quality meets industry standards	Thailand v. Vietnam	0	2	0
Quality exceeds industry standards	Thailand v. Vietnam	0	2	0
Reliability of supply	Thailand v. Vietnam	0	2	0
Technical support/service	Thailand v. Vietnam	0	2	0
U.S. transportation costs	Thailand v. Vietnam	0	2	0

Table continued.

Table II-11 Continued**Paper plates: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Count in number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	Thailand v. Nonsubject	0	0	0
Delivery terms	Thailand v. Nonsubject	0	0	0
Delivery time	Thailand v. Nonsubject	0	0	0
Discounts offered	Thailand v. Nonsubject	0	0	0
Minimum quantity requirements	Thailand v. Nonsubject	0	0	0
Packaging	Thailand v. Nonsubject	0	0	0
Payment terms	Thailand v. Nonsubject	0	0	0
Price	Thailand v. Nonsubject	0	0	0
Product consistency	Thailand v. Nonsubject	0	0	0
Product range	Thailand v. Nonsubject	0	0	0
Quality meets industry standards	Thailand v. Nonsubject	0	0	0
Quality exceeds industry standards	Thailand v. Nonsubject	0	0	0
Reliability of supply	Thailand v. Nonsubject	0	0	0
Technical support/service	Thailand v. Nonsubject	0	0	0
U.S. transportation costs	Thailand v. Nonsubject	0	0	0

Table continued.

Table II-11 Continued
Paper plates: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair

Count in number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	Vietnam v. Nonsubject	1	1	0
Delivery terms	Vietnam v. Nonsubject	0	2	0
Delivery time	Vietnam v. Nonsubject	0	1	1
Discounts offered	Vietnam v. Nonsubject	0	2	0
Minimum quantity requirements	Vietnam v. Nonsubject	0	2	0
Packaging	Vietnam v. Nonsubject	0	2	0
Payment terms	Vietnam v. Nonsubject	0	2	0
Price	Vietnam v. Nonsubject	1	2	0
Product consistency	Vietnam v. Nonsubject	0	2	0
Product range	Vietnam v. Nonsubject	1	1	0
Quality meets industry standards	Vietnam v. Nonsubject	0	2	0
Quality exceeds industry standards	Vietnam v. Nonsubject	0	2	0
Reliability of supply	Vietnam v. Nonsubject	1	1	0
Technical support/service	Vietnam v. Nonsubject	0	2	0
U.S. transportation costs	Vietnam v. Nonsubject	0	2	0

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

Note: With respect to cost/price factors, a rating of superior means that cost/price for the first source in the country pair is generally lower. For example, if a firm reported "U.S. superior," it meant that the U.S. product was generally priced lower than the imported product.

Comparison of U.S.-produced and imported paper plates

In order to determine whether U.S.-produced paper plates can generally be used in the same applications as imports from China, Thailand, and/or Vietnam, U.S. producers, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in tables II-12 to II-14, most U.S. producers, importers, and purchasers responded that U.S.-produced paper plates can always or frequently be used interchangeably with product from both subject and nonsubject sources.

Table II-12**Paper plates: Count of U.S. producers reporting the interchangeability between product produced in the United States and in other countries, by country pair**

Count in number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. China	5	1	1	0
U.S. vs. Thailand	5	1	1	0
U.S. vs. Vietnam	5	1	1	0
U.S. vs. Other	4	1	1	0
China vs. Thailand	5	1	0	0
China vs. Vietnam	5	1	0	0
Thailand vs. Vietnam	5	1	0	0
China vs. Other	4	1	0	0
Thailand vs. Other	4	1	0	0
Vietnam vs. Other	4	1	0	0

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

Table II-13**Paper plates: Count of importers reporting the interchangeability between product produced in the United States and in other countries, by country pair**

Count in number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. China	7	3	5	2
U.S. vs. Thailand	6	0	2	1
U.S. vs. Vietnam	7	2	3	1
U.S. vs. Other	6	2	2	2
China vs. Thailand	6	0	1	1
China vs. Vietnam	7	2	2	1
Thailand vs. Vietnam	5	0	1	1
China vs. Other	5	3	2	0
Thailand vs. Other	4	0	1	1
Vietnam vs. Other	5	2	1	1

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

Table II-14**Paper plates: Count of purchasers reporting the interchangeability between product produced in the United States and in other countries, by country pair**

Count in number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. China	6	6	2	0
U.S. vs. Thailand	3	1	0	0
U.S. vs. Vietnam	4	2	3	0
U.S. vs. Other	4	1	3	0
China vs. Thailand	2	0	0	0
China vs. Vietnam	3	1	1	0
Thailand vs. Vietnam	1	0	1	0
China vs. Other	3	2	2	0
Thailand vs. Other	1	0	1	0
Vietnam vs. Other	2	1	1	0

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

In additional comments, one U.S. producer (***) stated that the paper plates imported from China, Thailand, and Vietnam are of lower quality, while plates produced in the United States (***) are typically sturdier and possess attributes like ***. U.S. producer *** stated that most subject imports are light or medium weight paper plates that are frequently interchangeable with U.S. product. Importer *** described commodity white paper plates as not interchangeable with highly designed but still disposable paper plates. Importer *** stated that fully printed, hot-stamped, and/or shaped plates are not typically available from U.S. suppliers. Importer *** stated that no U.S. producers produce the paper plates with special molds, designs, and finishes that it supplies. Importer *** stated that U.S., Chinese, and Vietnamese paper plates have the same customer end use but only sometimes have similar design capabilities. Among purchasers, *** stated that U.S. product was only sometimes interchangeable with product from China and Vietnam because it stated that U.S. producers were unable to produce certain design elements for occasional paper plates. Purchaser *** stated that it has not been able to find a domestic producer that has the capability to produce ***. Importer *** stated that it was not aware of U.S. producers that produced ***.

In addition, U.S. producers, importers, and purchasers were asked to assess how often differences other than price were significant in sales of paper plates from the United States, subject, or nonsubject countries. As seen in tables II-15 to II-17, all U.S. producers indicated that factors other than price were sometimes or never significant in sales of paper plates from

different sources. Majorities of importers indicated that factors other than price were sometimes or never significant in sales of paper plates from different sources (except for comparisons of U.S. and Vietnamese product and comparisons of Chinese and Vietnamese product. Majorities of purchasers also indicated that factors other than price were sometimes or never significant in sales of paper plates from different sources (except for most comparisons involving product from Thailand).

Table II-15
Paper plates: Count of U.S. producers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair

Count in number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. China	0	0	3	4
U.S. vs. Thailand	0	0	3	4
U.S. vs. Vietnam	0	0	3	4
U.S. vs. Other	0	0	3	3
China vs. Thailand	0	0	2	4
China vs. Vietnam	0	0	2	4
Thailand vs. Vietnam	0	0	2	4
China vs. Other	0	0	2	3
Thailand vs. Other	0	0	2	3
Vietnam vs. Other	0	0	2	3

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

Table II-16
Paper plates: Count of importers reporting the significance of differences between product produced in the United States and in other countries, by country pair

Count in number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. China	2	6	6	4
U.S. vs. Thailand	2	1	4	1
U.S. vs. Vietnam	2	5	3	3
U.S. vs. other	1	2	4	4
China vs. Thailand	1	1	4	2
China vs. Vietnam	2	4	3	3
Thailand vs. Vietnam	1	0	3	3
China vs. Other	1	3	2	3
Thailand vs. Other	1	0	2	2
Vietnam vs. Other	1	2	2	3

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

Table II-17

Paper plates: Count of purchasers reporting the significance of differences between product produced in the United States and in other countries, by country pair

Count in number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
U.S. vs. China	2	4	6	2
U.S. vs. Thailand	2	1	1	0
U.S. vs. Vietnam	1	3	4	1
U.S. vs. Other	1	2	2	3
China vs. Thailand	1	0	1	0
China vs. Vietnam	1	1	2	1
Thailand vs. Vietnam	1	0	2	0
China vs. Other	1	2	2	2
Thailand vs. Other	1	0	1	0
Vietnam vs. Other	1	1	1	1

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

In additional comments, U.S. producers noted the quality of paper plates as a significant factor other than price. One producer *** indicated that paper plates imported from other countries are sometimes of lower quality in design and material. Another producer (***) mirrored these statements.

Importers indicated that important factors other than price include manufacturing capabilities or process, bundling, volume/quantity/capacity, specific printing or stamping, product availability, technical support, responsiveness, and supplier relationships. Among purchasers, *** stated that product availability from U.S. producers is “significantly” lower than availability from China, Thailand, and Vietnam. *** stated that Chinese prices are less expensive than U.S. prices until transportation costs are taken into account, after which they are more expensive than prices for U.S. product. *** stated that U.S. producers provide more flexibility for changes than imported product does, and U.S. suppliers also provide quicker lead times and turnaround (production to shelf times). Purchasers *** reiterated their comments from interchangeability, i.e., that U.S. producers were unable to make certain designs of paper plates.

Elasticity estimates

This section discusses elasticity estimates; parties were encouraged to comment on these estimates in their prehearing or posthearing briefs. Only petitioners did so, as discussed below.

U.S. supply elasticity

The domestic supply elasticity for paper plates measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of paper plates. The elasticity of domestic supply depends on several factors including the level of excess capacity, the ease with which producers can alter capacity, producers' ability to shift to production of other products, the existence of inventories, and the availability of alternate markets for U.S.-produced paper plates. Analysis of these factors above indicates that the U.S. industry has the ability to greatly increase or decrease shipments to the U.S. market; an estimate in the range of 6 to 10 is suggested.²⁴

U.S. demand elasticity

The U.S. demand elasticity for paper plates measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of paper plates. This estimate depends on factors discussed above such as the existence, availability, and commercial viability of substitute products, as well as the component share of the paper plates in consumer meals. Based on the available information, the aggregate demand for paper plates is likely to be moderately inelastic; a range of -0.5 to -1.5 is suggested.²⁵

Substitution elasticity

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.²⁶ Product differentiation, in turn, depends upon such factors as quality (e.g., chemistry, appearance, etc.) and conditions of sale (e.g., availability, sales terms/discounts/promotions, etc.). Based on available information, the elasticity of substitution between U.S.-produced paper plates and imported paper plates is likely to be in the range of 3 to 6.²⁷ A majority of U.S. producers, importers, and purchasers described paper plates from different sources as always or frequently interchangeable.

²⁴ Petitioners agreed with the staff estimate for elasticity of supply. Petitioners' prehearing brief, p. 19.

²⁵ This estimate has been changed from the prehearing report; see "Demand" above and petitioners' prehearing brief, p. 17.

²⁶ The substitution elasticity measures the responsiveness of the relative U.S. consumption levels of the subject imports and the domestic like products to changes in their relative prices. This reflects how easily purchasers switch from the U.S. product to the subject products (or vice versa) when prices change.

²⁷ Petitioners stated that they believe the elasticity of substitution is in the "highest end" of this range. Petitioners' prehearing brief, p. 15.

Nonetheless, some importers and purchasers described some factors other than price, including design features such as stamping, foil printing, shape, and die cut, as important, somewhat constraining substitutability.

Part III: U.S. producers' production, shipments, and employment

The Commission analyzes a number of factors in making injury determinations (see 19 U.S.C. §§ 1677(7)(B) and 1677(7)(C)). Information on the subsidies and dumping margins was presented in Part I of this report and information on the volume and pricing of imports of the subject merchandise is presented in Part IV and Part V. Information on the other factors specified is presented in this section and/or Part VI and (except as noted) is based on the questionnaire responses of eight firms that accounted for the vast majority of U.S. production of paper plates during 2023.

U.S. producers

The Commission issued a U.S. producer questionnaire to 12 firms based on information contained in the petition, and through staff research. Eight firms provided a response on their operations. Table III-1 lists U.S. producers of paper plates, their production locations, positions on the petition, and shares of total production. *** and *** accounted for the largest shares of U.S. production of paper plates in 2023, *** percent and *** percent, respectively.

Table III-1

Paper plates: U.S. producers, their positions on the petition, production locations, and shares of reported production, 2023

Shares in percent

Firm	Position on petition	Production location(s)	Share of production
AJM Packaging	Petitioner	Detroit, MI Folkston, GA Vineland, NJ Joplin, MO Southgate, MI El Cajon, CA	***
Aspen Products	Petitioner	Kansas City, MO Richmond, VA Macon, GA	***
Dart Container	Petitioner	Federalsburg, MD Chicago, IL	***
Georgia-Pacific	***	Darlington, SC Fort Smith, AR Bowling Green, KY Jackson, TN	***
Hoffmaster	Petitioner	Clintonville, WI Appleton, WI Neenah, WI Green Bay, WI Joliet, IL Oshkosh, WI	***
Huhtamaki Americas	Petitioner	Marion, IN Batavia, OH Goodyear, AZ Albertville, AL	***
Pactiv	***	Columbus, OH	***
Unique Industries	Petitioner	Montoursville, PA Louisville, KY	***
All firms	Various	Various	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Table III-2 presents information on U.S. producers' ownership, related and/or affiliated firms.

Table III-2
Paper plates: U.S. producers' ownership, related and/or affiliated firms

Reporting firm	Relationship type and related firm	Details of relationship
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

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

Note: ***.

As indicated in table III-2, one U.S. producer, ***, is related to foreign importer/exporter of the subject merchandise, ***. In addition, as discussed in greater detail below, *** U.S. producers (***) directly imported subject merchandise during the period of investigations. No U.S. producers reported purchasing subject merchandise from U.S. importers.

Table III-3 presents events in the U.S. industry since January 1, 2021.

Table III-3
Paper plates: Important industry events since 2021

Item	Firm	Event
Plant Expansion	Georgia-Pacific	In October 2023, Georgia-Pacific completed a \$175 million investment at its Dixie facility in Darlington, South Carolina to expand its plate and bowl production operations. Construction on the expansion began in March 2020. The expansion includes additional printing capability, state of the art plate presses, and a new warehouse for finished goods. The expansion created 100 new full-time jobs.
New Product	Dart Container	In May 2024, Dart Container announced a new line of SOLO heavyweight paper plates called SOLO Bold Hold.
Plant Opening	Georgia-Pacific	In July 2024, Georgia-Pacific began production at its new \$425 million Dixie facility in Jackson, Tennessee. The facility includes a printer, associated plate-forming converting assets, and other state of the art manufacturing technology. Construction on the building continued through October 2024. The facility created more than 200 jobs.

Sources: Georgia-Pacific, "Georgia-Pacific Completes \$175 Million Investment at Darlington, South Carolina, Dixie Facility" <https://news.gp.com/2023/10/georgia-pacific-completes-175-million-investment-at-darlington-south-carolina-dixie-facility>, October 12, 2023. Dart Container, "SOLO Bold Hold: A New Era in Paper Plate Innovation" <https://www.dartcontainer.com/resources/media/news/solo-bold-hold-a-new-era-in-paper-plate-innovation>, May 14, 2024. Georgia-Pacific, "New Cutting-Edge Dixie Plant Begins Production of Premium Paper Plates" <https://news.gp.com/2024/07/new-cutting-edge-dixie-plant-begins-production-of-premium-paper-plates>, July 8, 2024. Georgia-Pacific, "Georgia-Pacific Cuts the Ribbon on New \$425 Million Dixie Tableware Facility in Jackson, Tennessee" <https://news.gp.com/2024/10/georgia-pacific-cuts-the-ribbon-on-new-425-million-dixie-tableware-facility-in-jackson-tennessee>, October 9, 2024.

Producers in the United States were asked to report any change in the character of their operations or organization relating to the production of paper plates since 2021. *** U.S. producers indicated in their questionnaires that they had experienced such changes. Table III-4 presents the changes identified by these producers. During the period of investigations, *** U.S. producers reported that they had experienced production curtailments at some point and *** U.S. producers reported expansions and/or plant openings during the same period.

Table III-4

Paper plates: U.S. producers' reported changes in operations, since January 1, 2021

Item	Firm name and narrative response on changes in operations
Plant openings	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***
Production curtailments	***

Table continued.

Table III-4 Continued

Paper plates: U.S. producers' reported changes in operations, since January 1, 2021

Item	Firm name and narrative response on changes in operations
Expansions	***
Expansions	***
Expansions	***
Expansions	***
Expansions	***
Acquisitions	***
Weather-related or force majeure events	***
Other	***

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

U.S. production, capacity, and capacity utilization

Table III-5 presents U.S. producers' installed and practical capacity and production on the same equipment. During 2021-23 reported installed overall capacity, practical overall capacity, and practical paper plates capacity increased by 14.3 percent, 12.8 percent, and 11.9 percent, respectively. This increase was largely driven by *** and Georgia-Pacific completing an expansion of its Darlington, South Carolina facility in 2023 and opening a new facility in Jackson, Tennessee in the summer of 2024.¹ During the same period overall production and paper plate production decreased by 7.0 percent and 6.9 percent, respectively, though both were over ten percent higher in January-June 2024 ("interim 2024") compared to January-June 2023 ("interim 2023").² During 2021-23, installed overall capacity utilization decreased from 63.6 percent to 51.8 percent, practical overall capacity utilization decreased from 72.1 percent to 59.4 percent, and reported practical paper plates capacity utilization decreased from 71.8 percent to 59.8 percent. Capacity utilization for all three categories was higher in interim 2024 compared to interim 2023.

Table III-5
Paper plates: U.S. producers' installed and practical capacity and production on the same equipment as in-scope production, by period

Capacity and production in 1,000 units; utilization in percent

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Installed overall	Capacity	84,126,152	89,364,550	96,197,678	47,262,881	47,434,622
Installed overall	Production	53,530,876	54,106,813	49,783,013	24,557,178	27,093,877
Installed overall	Utilization	63.6	60.5	51.8	52.0	57.1
Practical overall	Capacity	74,275,097	78,302,635	83,759,087	41,059,660	41,918,309
Practical overall	Production	53,530,876	54,106,813	49,783,013	24,557,178	27,093,877
Practical overall	Utilization	72.1	69.1	59.4	59.8	64.6
Practical paper plates	Capacity	73,350,403	77,265,023	82,066,293	40,213,263	41,181,358
Practical paper plates	Production	52,665,368	53,119,386	49,046,653	24,206,853	26,734,735
Practical paper plates	Utilization	71.8	68.7	59.8	60.2	64.9

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

¹ One U. S. producer, ***, reported a decrease in capacity during 2021-23, citing a need to ***.

² *** were the only U.S. producers to report an increase in production during 2021-23.

Table III-6 presents U.S. producers’ reported narratives regarding practical capacity constraints. Four U.S. producers cited “supply of material inputs” as a constraint while “existing labor force” was mentioned by three U.S. producers.

Table III-6
Paper plates: U.S. producers’ reported capacity constraints since January 1, 2021

Item	Firm name and narrative response on constraints to practical overall capacity
Existing labor force	***
Existing labor force	***
Existing labor force	***
Supply of material inputs	***
Supply of material inputs	***
Supply of material inputs	***
Supply of material inputs	***
Other constraints	***
Other constraints	***

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

Table III-7 and figure III-1 present U.S. producers’ production, capacity, and capacity utilization for paper plates. Practical capacity increased by 11.9 percent during 2021-23 and was 2.4 percent higher in interim 2024 than in interim 2023. Paper plates production decreased by 6.9 percent during 2021-23 but was 10.4 percent higher in interim 2024 than in interim 2023. Capacity utilization decreased from 71.8 percent to 59.8 percent from 2021 to 2023 but was 4.7 percentage points higher in interim 2024 compared to interim 2023.

Table III-7
Paper plates: U.S. producers' output, by firm and period

Practical capacity

Capacity in 1,000 units

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Pactiv	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	73,350,403	77,265,023	82,066,293	40,213,263	41,181,358

Table continued.

Table III-7 Continued
Paper plates: U.S. producers' output, by firm and period

Production

Production in 1,000 units

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Pactiv	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	52,665,368	53,119,386	49,046,653	24,206,853	26,734,735

Table continued.

Table III-7 Continued
Paper plates: U.S. producers' output, by firm and period

Capacity utilization

Capacity utilization in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Pactiv	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	71.8	68.7	59.8	60.2	64.9

Note: Capacity utilization ratio represents the ratio of the U.S. producer's production to its production capacity.

Table continued.

Table III-7 Continued
Paper plates: U.S. producers' output, by firm and period

Share of production

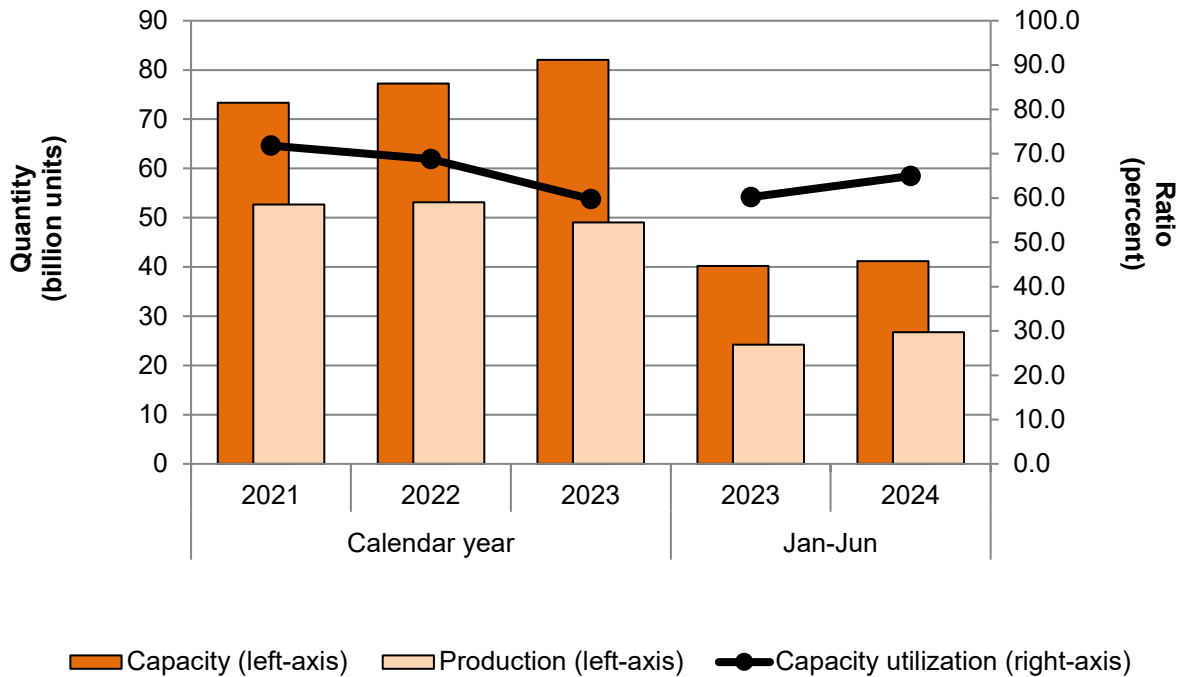
Share in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Pactiv	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure III-1
Paper plates: U.S. producers' capacity, production, and capacity utilization, by period



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

Alternative products

As shown in table III-8, *** percent of the product produced during 2021-23 by U.S. producers was paper plates. *** U.S. producers, ***, reported that they produce *** on the same equipment that is used to produce paper plates.

Table III-8
Paper plates: U.S. producers' overall production on the same equipment as in-scope production, by period

Quantity in 1,000 units; shares in percent

Product type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Paper plates	Quantity	52,665,368	53,119,386	49,046,653	24,206,853	26,734,735
Other products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
Paper plates	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
All products	Share	100.0	100.0	100.0	100.0	100.0

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

U.S. producers' U.S. shipments and exports

Table III-9 presents U.S. producers' U.S. shipments, export shipments, and total shipments of paper plates. U.S. shipments decreased 4.6 percent by quantity during 2021-23 but were 5.0 percent higher in interim 2024 than in interim 2023.³ During the same period, the value of U.S. shipments increased by 27.9 percent and were 1.5 percent higher in interim 2024 than in interim 2023. The unit value of U.S. shipments increased by 34.0 percent during 2021-23 but were 3.4 percent lower in interim 2024 than in interim 2023.

U.S. producers' export shipments of paper plates accounted for between 0.3 percent and 0.4 percent of total shipments of paper plates during 2021-23 and the interim periods. Export shipment by quantity decreased irregularly by 1.1 percent during 2021-23 but were 8.0 percent higher in interim 2024 than in interim 2023. During the same period, the value of export shipments increased by 26.6 percent and was 9.7 percent higher in interim 2024 than in interim 2023. The unit value of U.S. producers' export shipments was generally comparable to those of their U.S. shipments during the period of investigations. U.S. producers reported all their shipments of paper plates as commercial shipments with none reported as internal consumption or transfers to related firms.

Table III-9
Paper plates: U.S. producers' shipments, by destination and period

Quantity in 1,000 units; value in 1,000 dollars; unit value in dollars per 1,000 units; shares in percent

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
U.S. shipments	Quantity	52,471,202	50,716,568	50,071,508	24,974,584	26,230,272
Export shipments	Quantity	180,528	185,964	178,540	101,400	109,487
Total shipments	Quantity	52,651,730	50,902,532	50,250,048	25,075,984	26,339,759
U.S. shipments	Value	2,245,358	2,654,288	2,871,044	1,420,230	1,441,263
Export shipments	Value	8,198	9,825	10,378	5,770	6,332
Total shipments	Value	2,253,556	2,664,113	2,881,422	1,426,000	1,447,595
U.S. shipments	Unit value	42.79	52.34	57.34	56.87	54.95
Export shipments	Unit value	45.41	52.83	58.13	56.90	57.83
Total shipments	Unit value	42.80	52.34	57.34	56.87	54.96
U.S. shipments	Share of quantity	99.7	99.6	99.6	99.6	99.6
Export shipments	Share of quantity	0.3	0.4	0.4	0.4	0.4
Total shipments	Share of quantity	100.0	100.0	100.0	100.0	100.0
U.S. shipments	Share of value	99.6	99.6	99.6	99.6	99.6
Export shipments	Share of value	0.4	0.4	0.4	0.4	0.4
Total shipments	Share of value	100.0	100.0	100.0	100.0	100.0

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

³ *** in each full- and partial- year period.

U.S. producers' inventories

Table III-10 presents U.S. producers' end-of-period inventories and the ratio of these inventories to U.S. producers' production, U.S. shipments, and total shipments. U.S. producers' inventories increased by 59.6 percent from 2021 to 2022 before declining by 20.5 percent in 2023 for an overall increase of 27.0 percent during 2021-23, and were 1.2 percent higher in interim 2024 compared to interim 2023. Inventories as a ratio to U.S. production increased by 4.1 percentage points from 2021 to 2022 before declining by 1.6 percentage points in 2023 for an overall increase of 2.6 percentage points during 2021-23 but were 0.9 percentage points lower in interim 2024 than in interim 2023. U.S. producers' inventories as a ratio to U.S. and total shipments both increased by 4.6 percentage points from 2021 to 2022 before declining by 2.3 percentage points for both in 2023 for an overall increase of 2.4 and 2.3 percentage points, respectively, during 2021-23 but were lower in interim 2024 compared to interim 2023.

Table III-10

Paper plates: U.S. producers' inventories and their ratio to select items, by period

Quantity in 1,000 units; ratio in percent

Item	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
End-of-period inventory quantity	3,737,804	5,966,092	4,745,870	5,067,854	5,130,379
Inventory ratio to U.S. production	7.1	11.2	9.7	10.5	9.6
Inventory ratio to U.S. shipments	7.1	11.8	9.5	10.1	9.8
Inventory ratio to total shipments	7.1	11.7	9.4	10.1	9.7

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

U.S. producers' imports from subject sources

U.S. producers' imports of paper plates are presented in tables III-11 and III-12. Two U.S. producers (***) reported importing paper plates directly from subject sources during every period for which the Commission collected data. *** reasons for importing paper plates are presented in table III-13. ***'s U.S. imports of subject merchandise from *** decreased irregularly by *** percent during 2021-23 but were *** percent higher in interim 2024 compared to interim 2023. It's ratio of subject imports from *** to U.S. production of paper plates decreased from *** percent in 2021 to *** percent in 2022 before increasing to *** percent in 2023 but was *** percent in interim 2024 compared to *** percent in interim 2023.

*** U.S. imports of subject merchandise from *** and *** increased irregularly by *** percent during 2021-23 but were *** percent lower in interim 2024 compared to interim 2023. Its ratio of subject imports from *** and *** to U.S. production of paper plates decreased from *** percent in 2021 to *** percent in 2022 before increasing to *** percent in 2023 but was *** percent in interim 2024 compared to *** percent in interim 2023.

Table III-11

Paper plates: *'s U.S. production, subject imports, and ratio of subject imports to production, by source and period**

Quantity in 1,000 units; ratio in percent

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
U.S. production	Quantity	***	***	***	***	***
Imports from ***	Quantity	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***

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

Table III-12

Paper plates: *'s U.S. production, subject imports, and ratio of subject imports to production, by source and period**

Quantity in 1,000 units; ratio in percent

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
U.S. production	Quantity	***	***	***	***	***
Imports from ***	Quantity	***	***	***	***	***
Imports from ***	Quantity	***	***	***	***	***
Imports from subject sources	Quantity	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***
Imports from *** to U.S. production	Ratio	***	***	***	***	***
Imports from subject sources to U.S. production	Ratio	***	***	***	***	***

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

Table III-13
Paper plates: U.S. producers' reasons for importing

Item	Narrative response on reasons for importing
***'s reason for importing	***
***'s reason for importing	***

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

U.S. producers' purchases of imports from subject sources

No responding U.S. producer reported purchases of paper plates during 2021-23 and both interim periods.

U.S. employment, wages, and productivity

Table III-14 shows U.S. producers' employment-related data. The number of production and related workers ("PRWs") reported by U.S. producers increased from 4,887 in 2021 to 5,146 in 2022 before decreasing to 4,804 in 2023 but were 4,964 in interim 2024 compared to 4,832 in interim 2023.⁴ Total hours worked and wages paid also increased by 4.8 percent and 12.7 percent, respectively, from 2021 to 2022 before decreasing by 6.6 percent and 4.9 percent, respectively, in 2023. Total hours worked per PRW remained steady during 2021-23 and the interim periods. During 2021-23, the average hourly wage increased from \$20.26 per hour in 2021 to \$22.19 per hour in 2023, an increase of 9.5 percent, and it was 2.6 percent higher at \$22.81 per hour in interim 2024 than in interim 2023. Productivity decreased by 4.8 percent during 2021-23, but was 5.1 percent higher in interim 2024 than in interim 2023. Unit

⁴ *** were the only two U.S. producers that added PRWs during 2021-23.

labor costs increased by 15.0 percent during 2021-23 but were 2.3 percent lower in interim 2024 than in interim 2023.⁵

Table III-14
Paper plates: U.S. producers' employment related information, by period

Item	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Production and related workers (PRWs) (number)	4,887	5,146	4,804	4,832	4,964
Total hours worked (1,000 hours)	11,196	11,728	10,949	5,366	5,640
Hours worked per PRW (hours)	2,291	2,279	2,279	1,111	1,136
Wages paid (\$1,000)	226,803	255,591	242,948	119,276	128,640
Hourly wages (dollars per hour)	\$20.26	\$21.79	\$22.19	\$22.23	\$22.81
Productivity (units per hour)	4,704	4,529	4,480	4,511	4,740
Unit labor costs (dollars per 1,000 units)	\$4.31	\$4.81	\$4.95	\$4.93	\$4.81

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

⁵ ***'s productivity metrics were notably higher and unit labor costs were notably lower than the industry average in all periods where data was collected. It was *** in those categories.

Part IV: U.S. imports, apparent U.S. consumption, and market shares

U.S. importers

The Commission issued importer questionnaires to 154 firms believed to be importers of subject paper plates, as well as to all U.S. producers of paper plates.¹ Usable questionnaire responses were received from 26 companies², representing the following percentages of U.S. imports from China, Thailand, Vietnam, and other sources in 2023 under HTS statistical reporting number 4823.69.0040, a “basket” category.³

- China: *** percent
- Thailand: ***
- Vietnam: ***
- Subject Sources: *** percent
- Nonsubject sources: *** percent⁴
- All import sources: *** percent

Table IV-1 lists all responding U.S. importers of paper plates from China, Thailand, Vietnam and other sources, their locations, and their shares of U.S. imports, in 2023.

¹ The Commission issued questionnaires to those firms identified in the petitions; staff research; and proprietary, Census-edited Customs’ import records.

² Sixteen firms responded that they did not import paper plates into the United States at any time since January 1, 2021.

³ Firms reported importing other products under this HTS statistical reporting number, including ***.

⁴ The coverage figures provided for nonsubject sources may be ***.

Table IV-1
Paper plates: U.S. importers, their headquarters, and share of imports within each source, 2023

Shares in percent

Firm	Headquarters	China	Thailand	Vietnam	Subject sources	Nonsubject sources	All import sources
Acadian Crossing	San Antonio, TX	***	***	***	***	***	***
Amscan	Woodcliff Lake, NJ	***	***	***	***	***	***
Best Brands	Edison, NJ	***	***	***	***	***	***
Brand Buzz	New York, NY	***	***	***	***	***	***
Cannon Group	Westerville, OH	***	***	***	***	***	***
Coterie	Chevy Chase, MD	***	***	***	***	***	***
Design Group Americas	Atlanta, GA	***	***	***	***	***	***
Discount Party	Jackson, MI	***	***	***	***	***	***
Dollar General	Goodlettsville, TN	***	***	***	***	***	***
Dollar Tree	Chesapeake, VA	***	***	***	***	***	***
Hallmark Cards	Kansas City, MO	***	***	***	***	***	***
Haynes Besco	Franklin, TN	***	***	***	***	***	***
HEB Grocery	San Antonio, TX	***	***	***	***	***	***
Hoffmaster	Oshkosh, WI	***	***	***	***	***	***
Infinite Commerce	Seattle, WA	***	***	***	***	***	***
Meijer	Grand Rapids, MI	***	***	***	***	***	***
My Mind's Eye	North Salt Lake, UT	***	***	***	***	***	***
Serabeena	Cheung Sha Wan, Hong Kong	***	***	***	***	***	***
Sophistiplate	Laguna Beach, CA	***	***	***	***	***	***
SP Richards	Atlanta, GA	***	***	***	***	***	***
Talking Tables	New York, NY	***	***	***	***	***	***
Target	Minneapolis, MN	***	***	***	***	***	***
Tzumi Electronics	New York, NY	***	***	***	***	***	***
Unique Industries	Philadelphia, PA	***	***	***	***	***	***
Veyer	Boca Raton, FL	***	***	***	***	***	***
Walmart	Bentonville, AR	***	***	***	***	***	***
All firms	Various	100.0	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

U.S. imports

Tables IV-2, IV-3, and figure IV-1 present data for U.S. imports of paper plates from China, Thailand, and Vietnam, and all other sources. Subject imports, by quantity, increased by *** percent from 2021 to 2022 before decreasing by *** percent in 2023, for an overall increase of *** percent during 2021-23, and were *** percent higher in interim 2024 compared to interim 2023. Subject imports, by value, increased by *** percent from 2021 to 2022 before decreasing by *** percent in 2023, for an overall increase of *** percent during 2021-23, and were *** percent higher in interim 2024 compared to interim 2023. Unit values for subject import decreased by *** percent during 2021-23 and were *** percent lower in interim 2024 compared to interim 2023. Subject sources' share of imports, based on quantity and by value, increased during 2021-23, and were higher in interim 2024 compared to interim 2023.

U.S. subject imports of paper plates from China increased irregularly by *** percent during 2021-23, and were *** percent higher in interim 2024 compared to interim 2023. Unit values decreased by *** percent during 2021-23 and were *** percent lower in interim 2024 compared to interim 2023. They decreased, on a quantity basis, as a share of total imports from *** percent in 2021 to *** percent in 2023 but were *** percent in interim 2024 compared to *** percent in interim 2023.

U.S. subject imports of paper plates from Thailand increased by *** during 2021-23, and were *** percent higher in interim 2024 compared to interim 2023. Unit values increased irregularly by *** percent during 2021-23 and were *** percent lower in interim 2024 compared to interim 2023. They increased, on a quantity basis, as a share of total imports from *** percent in 2021 to *** percent in 2023 but were *** percent in interim 2024 compared to *** percent in interim 2023.

U.S. subject imports of paper plates from Vietnam increased by *** percent during 2021-23, and were *** percent higher in interim 2024 compared to interim 2023. Unit values decreased by *** percent during 2021-23 and were *** percent lower in interim 2024 compared to interim 2023. They decreased irregularly, on a quantity basis, as a share of total imports from *** percent in 2021 to *** percent in 2023 but were *** percent in interim 2024 compared to *** percent in interim 2023.

During 2021-23, as a ratio to U.S. production, U.S. subject imports of paper plates from China, Thailand and Vietnam increased from *** percent to *** percent, *** percent to *** percent, and from *** percent to *** percent, respectively. They were higher for each subject country, as a share of U.S. production, in interim 2024 compared to interim 2023.

Table IV-2
Paper plates: U.S. imports, by source and period

Quantity in 1,000 units; value in 1,000 dollars; unit value in dollars per 1,000 units

Source	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
China	Quantity	***	***	***	***	***
Thailand	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
China	Value	***	***	***	***	***
Thailand	Value	***	***	***	***	***
Vietnam	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
China	Unit value	***	***	***	***	***
Thailand	Unit value	***	***	***	***	***
Vietnam	Unit value	***	***	***	***	***
Subject sources	Unit value	***	***	***	***	***
Nonsubject sources	Unit value	***	***	***	***	***
All import sources	Unit value	***	***	***	***	***

Table continued.

Table IV-2 Continued
Paper plates: Share of U.S. imports by source and period

Shares and ratios in percent; Ratios represent the ratio to U.S. production

Source	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
China	Share of quantity	***	***	***	***	***
Thailand	Share of quantity	***	***	***	***	***
Vietnam	Share of quantity	***	***	***	***	***
Subject sources	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	100.0	100.0	100.0	100.0	100.0
China	Share of value	***	***	***	***	***
Thailand	Share of value	***	***	***	***	***
Vietnam	Share of value	***	***	***	***	***
Subject sources	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	100.0	100.0	100.0	100.0	100.0
China	Ratio	***	***	***	***	***
Thailand	Ratio	***	***	***	***	***
Vietnam	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "--". Share of quantity is the share of U.S. imports by quantity; share of value is the share of U.S. imports by value; ratio are U.S. imports to production.

Table IV-3
Paper plates: Changes in import quantity, values, and unit values between comparison periods

Changes (Δ) in percent

Source	Measure	2021-23	2020-21	2022-23	Jan-Jun 2023-24
China	% Δ Quantity	▲***	▲***	▼***	▲***
Thailand	% Δ Quantity	▲***	▲***	▲***	▲***
Vietnam	% Δ Quantity	▲***	▲***	▲***	▲***
Subject sources	% Δ Quantity	▲***	▲***	▼***	▲***
Nonsubject sources	% Δ Quantity	▼***	▲***	▼***	▲***
All import sources	% Δ Quantity	▲***	▲***	▼***	▲***
China	% Δ Value	▲***	▲***	▼***	▲***
Thailand	% Δ Value	▲***	▲***	▲***	▲***
Vietnam	% Δ Value	▲***	▲***	▼***	▲***
Subject sources	% Δ Value	▲***	▲***	▼***	▲***
Nonsubject sources	% Δ Value	▼***	▲***	▼***	▲***
All import sources	% Δ Value	▲***	▲***	▼***	▲***
China	% Δ Unit value	▼***	▼***	▼***	▼***
Thailand	% Δ Unit value	▲***	▲***	▼***	▼***
Vietnam	% Δ Unit value	▼***	▼***	▼***	▼***
Subject sources	% Δ Unit value	▼***	▼***	▼***	▼***
Nonsubject sources	% Δ Unit value	▲***	▲***	▲***	▼***
All import sources	% Δ Unit value	▼***	▼***	▼***	▼***

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

Note: Percent changes shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure IV-1
Paper plates: U.S. import quantities and average unit values, by source and period

* * * * *

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

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.⁵ 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.⁶ Table IV-4 presents information on imports from China, Thailand, and Vietnam and all other sources in the 12-month period preceding the filing of the petition (i.e., January 2023 through December 2023). Imports from China, Thailand, and Vietnam accounted for *** percent, *** percent, and *** percent of total imports of paper plates by quantity during this period, respectively.

Table IV-4

Paper plates: U.S. imports in the twelve-month period preceding the filing of the petition, January 2023 through December 2023

Quantity in 1,000 units; share in percent

Source of imports	Quantity	Share of quantity
China	***	***
Thailand	***	***
Vietnam	***	***
Subject sources	***	***
Nonsubject sources	***	***
All import sources	***	100.0

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

⁵ 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)).

⁶ Section 771 (24) of the Act (19 U.S.C § 1677(24)).

Critical circumstances

China

On January 28, 2025, Commerce issued its final determination that “critical circumstances” exist with regard to subsidized imports of paper plates from China for Fuzhou Hengli Paper Co., Ltd. (“Fuzhou Hengli”), non-responsive companies,⁷ and all other producers and/or exporters.⁸ In addition, Commerce determined that critical circumstances do not exist with respect to subsidized imports of paper plates from Jinhua P&P Product Co., Ltd (“Jinhua P&P”). In this investigation, if both Commerce and the Commission make affirmative final critical circumstances determinations, certain subject imports may be subject to countervailing duties retroactive by 90 days from July 1, 2024, the effective date of Commerce’s preliminary affirmative CVD determination. Tables IV-5, IV-6, and figure IV-2 present data on Commerce’s final affirmative critical circumstances determination in the China countervailing duty investigation.

On January 28, 2025, Commerce also issued its final determination that “critical circumstances” exist with regard to imports of paper plates from China sold at LTFV for Fuzhou Hengli and its unaffiliated producers, non-selected companies eligible for a separate rate, and the China-wide entity.⁹ In addition, Commerce determined that critical circumstances do not

⁷ The companies that failed to respond to Commerce's Q&V questionnaire are: (1) Ningbo Artcool Co., Ltd.; (2) Ningbo Fenghua Yongfa Printing Stationery Co., Ltd.; (3) Zhejiang Kingsun Eco-Pack Co., Ltd.; and (4) Zhejiang Lingrong Crafts Co., Ltd.

⁸ 90 FR 8281, January 28, 2025, referenced in app. A. When petitioners file timely allegations of critical circumstances in CVD investigations, Commerce examines whether there is a reasonable basis to believe or suspect that (1) either there is a history of subsidization and material injury by reason of 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 subsidized subject merchandise 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.

⁹ 90 FR 8271, January 28, 2025, referenced in app. A. When petitioners file timely allegations of critical circumstances in AD investigations, Commerce examines whether there is a reasonable basis to believe or suspect that (1) either there is a history of dumping and material injury by reason of dumped 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 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.

exist with respect to LTFV imports of paper plates from Jinhua P&P. In this investigation, 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 September 5, 2024, the effective date of Commerce’s preliminary affirmative LTFV determination. Tables IV-5, IV-6, and figure IV-2 present this data.

Table IV-5
Paper plates: U.S. imports from China subject to Commerce’s affirmative final critical circumstances determinations in its AD/CVD investigations, by month

Quantity in 1,000 units

Month	Relation to petition	Quantity
September 2023	Before	***
October 2023	Before	***
November 2023	Before	***
December 2023	Before	***
January 2024	Before	***
February 2024	After	***
March 2024	After	***
April 2024	After	***
May 2024	After	***
June 2024	After	***

Table continued.

Table IV-5 Continued
Paper plates: U.S. imports from China subject to Commerce’s final affirmative critical circumstances determinations in its AD/CVD investigations, by differing number of months before and after the filing of the petition

Quantity in 1,000 units; difference in percent

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	***	***	***

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

Note: In its CVD investigation, Commerce in its final determination found critical circumstances exist for subject imports of paper plates from Fuzhou Hengli, all-other producers and/or exporters, and the non-responsive companies, and do not exist with respect to imports of subject merchandise for Jinhua P&P. In its AD investigation, Commerce in its final determination found critical circumstances exist for imports of paper plates from Fuzhou Hengli and its unaffiliated producers, the non-selected companies eligible for a separate rate, and the China-wide entity but that critical circumstances do not exist for Jinhua.

Figure IV-2

Paper plates: U.S. imports from China subject to Commerce’s final affirmative critical circumstances determinations in its AD/CVD investigations, by month

* * * * *

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

Note: In its CVD investigation, Commerce in its final determination found critical circumstances exist for subject imports of paper plates from Fuzhou Hengli, all-other producers and/or exporters, and the non-responsive companies, and do not exist with respect to imports of subject merchandise for Jinhua P&P. In its AD investigation, Commerce in its final determination found critical circumstances exist for imports of paper plates from Fuzhou Hengli and its unaffiliated producers, the non-selected companies eligible for a separate rate, and the China-wide entity but that critical circumstances do not exist for Jinhua.

Table IV-6

Paper plates: U.S. importers' U.S. inventories of imports from China for analysis in relation to Commerce’s final affirmative critical circumstances determinations in its AD/CVD investigations, by date

Quantity in 1,000 units; Index in percent where January 31, 2024 = 100.0 percent

Date	Quantity	Index
January 31, 2024	***	100.0
February 29, 2024	***	***
March 31, 2024	***	***
April 30, 2024	***	***
May 31, 2024	***	***
June 30, 2024	***	***

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

Note: In its CVD investigation, Commerce in its final determination found critical circumstances exist for subject imports of paper plates from Fuzhou Hengli, all-other producers and/or exporters, and the non-responsive companies, and do not exist with respect to imports of subject merchandise for Jinhua P&P. In its AD investigation, Commerce in its final determination found critical circumstances exist for imports of paper plates from Fuzhou Hengli and its unaffiliated producers, the non-selected companies eligible for a separate rate, and the China-wide entity but that critical circumstances do not exist for Jinhua.

Thailand

On January 28, 2025, Commerce issued its final determination that “critical circumstances” exist with regard to imports of paper plates from Thailand sold at LTFV for the seven companies that were non-responsive to the quantity and value (Q&V) questionnaire (i.e., ABC Digital Technology Co Ltd, Beeconscious Co, Dester Co, Ltd, Pimlapas Printing Co., Ltd, Sincerely Cargo, Thai Coconut Co Ltd, and Thai Union Manufacturing Co., Ltd.) to which Commerce applied adverse inferences.¹⁰ In addition, Commerce determined that critical circumstances do not exist with respect to LTFV imports of paper plates from Thai Paper, the three companies responsive to the Q&V questionnaire (i.e., Nirvana Foods & Commerce International Co., Ltd. (“Nirvana”), Pandora Production Co (“Pandora”), and SNC Cup Co., Ltd. (“SNC Cup”)), and all other producers/exporters.

In this investigation, 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 September 5, 2024, the effective date of Commerce’s final affirmative LTFV determination. Tables IV-7, IV-8, and figure IV-3 present this data.

¹⁰ 90 FR 8262, January 28, 2025, referenced in app. A. When petitioners file timely allegations of critical circumstances in AD investigations, Commerce examines whether there is a reasonable basis to believe or suspect that (1) either there is a history of dumping and material injury by reason of dumped 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 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.

Table IV-7**Paper plates: U.S. imports from Thailand subject to Commerce’s affirmative final critical circumstances determination in its AD investigation, by month**

Quantity in 1,000 units

Month	Relation to petition	Quantity
August 2023	Before	***
September 2023	Before	***
October 2023	Before	***
November 2023	Before	***
December 2023	Before	***
January 2024	Before	***
February 2024	After	***
March 2024	After	***
April 2024	After	***
May 2024	After	***
June 2024	After	***
July 2024	After	***

Table continued.

Table IV-7 Continued**Paper plates: U.S. imports from Thailand subject to Commerce’s affirmative final critical circumstances determination in its AD investigation, by differing number of months before and after the filing of the petition**

Quantity in 1,000 units; difference in percent

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: In its AD investigation, Commerce in its final determination found critical circumstances exist for imports sold at LTFV from ABC Digital Technology Co Ltd, Beeconscious Co, Dester Co, Ltd, Pimlapas Printing Co., Ltd, Sincerely Cargo, Thai Coconut Co Ltd, and Thai Union Manufacturing Co., Ltd., but do not exist with respect to such imports from Thai Paper, Nirvana, Pandora, SNC Cup, and all other producers/exporters.

Note: ***.

Figure IV-3

Paper plates: U.S. imports from Thailand subject to final affirmative Commerce critical circumstances determination in its AD investigation, by month

* * * * *

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

Note: In its AD investigation, Commerce in its final determination found critical circumstances exist for imports sold at LTFV from ABC Digital Technology Co Ltd, Beeconconscious Co, Dester Co, Ltd, Pimlapas Printing Co., Ltd, Sincerely Cargo, Thai Coconut Co Ltd, and Thai Union Manufacturing Co., Ltd., but do not exist with respect to such imports from Thai Paper, Nirvana, Pandora, SNC Cup, and all other producers/exporters.

Table IV-8

Paper plates: U.S. importers' U.S. inventories of imports from Thailand for analysis in relation to a final affirmative Commerce critical circumstances determination in its AD investigation, by date

Quantity in 1,000 units; Index in percent where January 31, 2024 = 100.0 percent

Date	Quantity	Index
January 31, 2024	***	100.0
February 29, 2024	***	***
March 31, 2024	***	***
April 30, 2024	***	***
May 31, 2024	***	***
June 30, 2024	***	***
July 31, 2024	***	***

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

Note: In its AD investigation, Commerce in its final determination found critical circumstances exist for imports sold at LTFV from ABC Digital Technology Co Ltd, Beeconconscious Co, Dester Co, Ltd, Pimlapas Printing Co., Ltd, Sincerely Cargo, Thai Coconut Co Ltd, and Thai Union Manufacturing Co., Ltd., but do not exist with respect to such imports from Thai Paper, Nirvana, Pandora, SNC Cup, and all other producers/exporters.

Vietnam

On January 28, 2025, Commerce issued its final determination that “critical circumstances” exist with regard to subsidized imports of paper plates from Vietnam for Xie Li Vietnam International Company (“Xie Li”), all other producers and exporters, and companies that were not responsive to Commerce's quantity and value (Q&V) questionnaire (Innovative Sonic Vietnam International, Ningbo Changya Plastic Vietnam Company, Ningbo Changya Plastic Vietnam, and SCG Vietnam).¹¹ In addition, Commerce determined that critical circumstances do not exist with respect to subsidized imports of paper plates from Go-Pak Paper Products Vietnam Co., Ltd. (“Go-Pak”). In this investigation, if both Commerce and the Commission make affirmative final critical circumstances determinations, certain subject imports may be subject to countervailing duties retroactive by 90 days from July 1, 2024, the effective date of Commerce’s preliminary affirmative LTFV determination.

On January 28, 2025, Commerce issued its final determination that “critical circumstances” exist with regard to imports of paper plates from Vietnam sold at LTFV for the Vietnam-Wide entity but not for Go-Pak.¹² In this investigation, 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 September 5, 2024, the effective date of Commerce’s preliminary affirmative LTFV determination. Tables IV-9, IV-10, and figure IV-4 present data on Commerce’s final affirmative critical circumstances determinations in the Vietnam countervailing and antidumping duty investigations.

¹¹ 90 FR 8258, January 28, 2025, referenced in app. A. When petitioners file timely allegations of critical circumstances in CVD investigations, Commerce examines whether there is a reasonable basis to believe or suspect that (1) either there is a history of subsidization and material injury by reason of 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 subsidized subject merchandise 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.

¹² 90 FR 8265, January 28, 2025, referenced in app. A. When petitioners file timely allegations of critical circumstances in AD investigations, Commerce examines whether there is a reasonable basis to believe or suspect that (1) either there is a history of dumping and material injury by reason of dumped 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 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.

Table IV-9**Paper plates: U.S. imports from Vietnam subject to Commerce’s final affirmative critical circumstances determinations in the AD/CVD investigations, by month**

Quantity in 1,000 units

Month	Relation to petition	Quantity
September 2023	Before	***
October 2023	Before	***
November 2023	Before	***
December 2023	Before	***
January 2024	Before	***
February 2024	After	***
March 2024	After	***
April 2024	After	***
May 2024	After	***
June 2024	After	***

Table continued.

Table IV-9 Continued**Paper plates: U.S. imports from Vietnam subject to Commerce’s final affirmative critical circumstances determinations in the AD/CVD investigations, by differing number of months before and after the filing of the petition**

Quantity in 1,000 units; difference in percent

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	***	***	***

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

Note: In its AD/CVD investigations, Commerce in its final determinations found critical circumstances exist with regard to subsidized imports of paper plates from Vietnam sold at LTFV for the Vietnam-Wide entity but not for Go-Pak.

Figure IV-4

Paper plates: U.S. imports from Vietnam subject to Commerce’s final affirmative critical circumstances determinations in the AD/CVD investigations, by month

* * * * *

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

Note: In its AD/CVD investigations, Commerce in its final determinations found critical circumstances exist with regard to subsidized imports of paper plates from Vietnam sold at LTFV for the Vietnam-Wide entity but not for Go-Pak.

Table IV-10

Paper plates: U.S. importers' U.S. inventories of imports from Vietnam for analysis in relation to final affirmative Commerce critical circumstances determinations in the AD/CVD investigations, by date

Quantity in 1,000 units; Index in percent where January 31, 2024 = 100.0 percent

Date	Quantity	Index
January 31, 2024	***	100.0
February 29, 2024	***	***
March 31, 2024	***	***
April 30, 2024	***	***
May 31, 2024	***	***
June 30, 2024	***	***

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

Note: In its AD/CVD investigations, Commerce in its final determinations found critical circumstances exist with regard to subsidized imports of paper plates from Vietnam sold at LTFV for the Vietnam-Wide entity but not for Go-Pak.

Cumulation considerations

In assessing whether imports should be cumulated, the Commission determines whether U.S. imports from the subject countries compete with each other and with the domestic like product and has generally considered four factors: (1) fungibility, (2) presence of sales or offers to sell in the same geographical markets, (3) common or similar channels of distribution, and (4) simultaneous presence in the market. Information regarding channels of distribution, market areas, and interchangeability appear in Part II. Additional information concerning fungibility, geographical markets, and simultaneous presence in the market is presented below.

Fungibility

Table IV-11 and figure IV-5 present information on U.S. producers' and U.S. importers' U.S. shipments in 2023 of paper plates by source and width – less than or equal to 7.5 inch paper plates, greater than 7.5 inch to 9.0 inch paper plates, and greater than 9.0 inch paper plates. U.S. producers and U.S. importers shipped paper plates in all three width ranges during 2023. For both U.S. producers and U.S. importers, U.S. shipments of paper plates greater than 7.5 inches in width accounted for the vast majority of U.S. shipments in 2023. Additional data on U.S. producers' and U.S. importers' U.S. shipments by source and width are presented in appendix E.

Table IV-11
Paper plates: U.S. producers' and U.S. importers' U.S. shipments, by source and width, 2023

Quantity in 1,000 units

Source	≤7.5 inches	>7.5 inches to ≤9.0 inches	>9.0 inches	All widths
U.S. producers	2,437,821	27,987,311	19,646,374	50,071,506
China	***	***	***	***
Thailand	***	***	***	***
Vietnam	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	***	***	***	***

Table continued.

Table IV-11 Continued

Paper plates: U.S. producers' and U.S. importers' U.S. shipments, by source and width, 2023

Share across in percent

Source	≤7.5 inches	>7.5 inches to ≤9.0 inches	>9.0 inches	All widths
U.S. producers	4.9	55.9	39.2	100.0
China	***	***	***	100.0
Thailand	***	***	***	100.0
Vietnam	***	***	***	100.0
Subject sources	***	***	***	100.0
Nonsubject sources	***	***	***	100.0
All import sources	***	***	***	100.0
All sources	***	***	***	100.0

Table continued.

Table IV-11 Continued

Paper plates: U.S. producers' and U.S. importers' U.S. shipments, by source and width, 2023

Share down in percent

Source	≤7.5 inches	>7.5 inches to ≤9.0 inches	>9.0 inches	All widths
U.S. producers	***	***	***	***
China	***	***	***	***
Thailand	***	***	***	***
Vietnam	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure IV-5
Paper plates: U.S. producers' and U.S. importers' U.S. shipments, by source and width, 2023

* * * * *

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

The Commission also collected information on U.S. producers' and U.S. importers' U.S. shipments of paper plates during 2023 by source and by color—solid white, special occasion,¹³ or other colors. These data are presented in table IV-12 and figure IV-6. U.S. producers shipped paper plates in all colors during 2023. U.S. importers' U.S. shipments of *** and ***. For U.S. producers and subject U.S. importers, U.S. shipments of paper plates *** accounted for the largest share of U.S. shipments of paper plates during 2023. Additional data on U.S. producers' and U.S. importers' U.S. shipments by source and color are presented in appendix E.

¹³ Includes customized seasonal, holiday, or special occasion-themed products.

Table IV-12
Paper plates: U.S. producers' and U.S. importers' U.S. shipments, by source and color, 2023

Quantity in 1,000 units

Source	Solid white	Special occasion	Other colors	All colors
U.S. producers	8,895,115	6,197,428	34,978,963	50,071,506
China	***	***	***	***
Thailand	***	***	***	***
Vietnam	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	***	***	***	***

Table continued.

Table IV-12 Continued
Paper plates: U.S. producers' and U.S. importers' U.S. shipments, by source and color, 2023

Share across in percent

Source	Solid white	Special occasion	Other colors	All colors
U.S. producers	17.8	12.4	69.9	100.0
China	***	***	***	100.0
Thailand	***	***	***	100.0
Vietnam	***	***	***	100.0
Subject sources	***	***	***	100.0
Nonsubject sources	***	***	***	100.0
All import sources	***	***	***	100.0
All sources	***	***	***	100.0

Table continued.

Table IV-12 Continued
Paper plates: U.S. producers' and U.S. importers' U.S. shipments, by source and color, 2023

Share down in percent

Source	Solid white	Special occasion	Other colors	All colors
U.S. producers	***	***	***	***
China	***	***	***	***
Thailand	***	***	***	***
Vietnam	***	***	***	***
Subject sources	***	***	***	***
Nonsubject sources	***	***	***	***
All import sources	***	***	***	***
All sources	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure IV-6
Paper plates: U.S. producers' and U.S. importers' U.S. shipments, by source and color, 2023

* * * * *

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

The Commission also collected information on U.S. producers' and U.S. importers' U.S. shipments of paper plates during 2023¹⁴ by source and branding types—private label or branded label. These data are presented in table IV-13 and figure IV-7. U.S. producers and U.S. importers, ***, shipped both private label and branded label paper plates during 2023. U.S. producers and *** importers' 2023 U.S. shipments were *** while *** importers shipped predominantly *** paper plates. Shipments of imports from nonsubject sources were predominantly *** paper plates. Additional data on U.S. producers' and U.S. importers' U.S. shipments by branding type are presented in appendix D.

¹⁴ Additional data on U.S. producers' and U.S. importers' reported range of average unit values (AUVs) are presented in appendix F.

Table IV-13**Paper plates: U.S. producers' and U.S. importers' U.S. shipments, by source and branding types, 2023**

Quantity in 1,000 units

Source	Branded	Private label	All branding types
U.S. producers	***	***	***
China	***	***	***
Thailand	***	***	***
Vietnam	***	***	***
Subject sources	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***
All sources	***	***	***

Table continued.

Table IV-13 Continued**Paper plates: U.S. producers' and U.S. importers' U.S. shipments, by source and branding types, 2023**

Share across in percent

Source	Branded	Private label	All branding types
U.S. producers	***	***	100.0
China	***	***	100.0
Thailand	***	***	100.0
Vietnam	***	***	100.0
Subject sources	***	***	100.0
Nonsubject sources	***	***	100.0
All import sources	***	***	100.0
All sources	***	***	100.0

Table continued.

Table IV-13 Continued**Paper plates: U.S. producers' and U.S. importers' U.S. shipments, by source and branding types, 2023**

Share down in percent

Source	Branded	Private label	All branding types
U.S. producers	***	***	***
China	***	***	***
Thailand	***	***	***
Vietnam	***	***	***
Subject sources	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***
All sources	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "--".

Figure IV-7
Paper plates: U.S. producers' and U.S. importers' U.S. shipments, by source and branding types, 2023

* * * * *

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

Geographical markets

Paper plates produced in the United States are shipped nationwide.¹⁵ In 2023, official U.S. import statistics, as presented in table IV-14, show that imports from all sources entered through all four borders of entry (i.e., East, North, South, and West). More than half of U.S. imports of paper or paperboard trays, dishes, plates, cups, and the like¹⁶ from subject sources entered through the Eastern border of entry of the United States, followed by the Western and Northern borders of entry with 25.6 and 11.7 percent, respectively. The Eastern border of entry of the United States was the biggest border of entry for imports of paper plates from each subject country.

¹⁵ See Part II for additional information on geographic markets.

¹⁶ Statistical reporting number 4823.69.0040 is a “basket” category that includes paper plates and out-of-scope products such as paper or paperboard trays, dishes, cups, and the like.

Table IV-14**Paper or paperboard trays, dishes, plates, cups, and the like: U.S. imports, by source and by border of entry, 2023**

Quantity in 1,000 pounds

Source	East	North	South	West	All borders
China	68,549	15,239	14,986	33,574	132,349
Thailand	1,878	1,116	662	856	4,513
Vietnam	4,146	575	720	2,771	8,212
Subject sources	74,573	16,930	16,369	37,201	145,073
Nonsubject sources	9,252	1,787	4,253	19,429	34,721
All import sources	83,825	18,717	20,622	56,630	179,793

Table continued.

Table IV-14 Continued**Paper or paperboard trays, dishes, plates, cups, and the like: U.S. imports, by source and by border of entry, 2023**

Share across in percent

Source	East	North	South	West	All borders
China	51.8	11.5	11.3	25.4	100.0
Thailand	41.6	24.7	14.7	19.0	100.0
Vietnam	50.5	7.0	8.8	33.7	100.0
Subject sources	51.4	11.7	11.3	25.6	100.0
Nonsubject sources	26.6	5.1	12.2	56.0	100.0
All import sources	46.6	10.4	11.5	31.5	100.0

Table continued.

Table IV-14 Continued**Paper or paperboard trays, dishes, plates, cups, and the like: U.S. imports, by source and by border of entry, 2023**

Share down in percent

Source	East	North	South	West	All borders
China	81.8	81.4	72.7	59.3	73.6
Thailand	2.2	6.0	3.2	1.5	2.5
Vietnam	4.9	3.1	3.5	4.9	4.6
Subject sources	89.0	90.5	79.4	65.7	80.7
Nonsubject sources	11.0	9.5	20.6	34.3	19.3
All import sources	100.0	100.0	100.0	100.0	100.0

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 4823.69.0040, accessed September 10, 2024. Imports are based on the imports for consumption data series.

Note: Data are likely overstated due to out-of-scope products under the HTS statistical reporting number.

Presence in the market

Table IV-15 and figures IV-8 and IV-9 present U.S. producers' monthly shipments of paper plates and monthly U.S. imports of paper plates for subject countries and nonsubject sources. U.S. producers reported U.S. shipments of paper plates in every month and U.S. imports of paper plates from China and from nonsubject sources were present every month from January 2021 to June 2024. During the same period, U.S. imports of paper plates from Thailand were present every month since December 2021 and U.S. imports of paper plates from Vietnam were present every month except May 2021.

Table IV-15
Paper plates: U.S. producers' U.S. shipments, U.S. importers' U.S. imports, by month and source

Quantity in 1,000 units

Year	Month	U.S. producers	China	Thailand	Vietnam
2021	January	***	***	***	***
2021	February	***	***	***	***
2021	March	***	***	***	***
2021	April	***	***	***	***
2021	May	***	***	***	***
2021	June	***	***	***	***
2021	July	***	***	***	***
2021	August	***	***	***	***
2021	September	***	***	***	***
2021	October	***	***	***	***
2021	November	***	***	***	***
2021	December	***	***	***	***
2022	January	***	***	***	***
2022	February	***	***	***	***
2022	March	***	***	***	***
2022	April	***	***	***	***
2022	May	***	***	***	***
2022	June	***	***	***	***
2022	July	***	***	***	***
2022	August	***	***	***	***
2022	September	***	***	***	***
2022	October	***	***	***	***
2022	November	***	***	***	***
2022	December	***	***	***	***

Table continued.

Table IV-15 Continued

Paper plates: U.S. producers' U.S. shipments, U.S. importers' U.S. imports, by month and source

Quantity in 1,000 units

Year	Month	Subject sources	Nonsubject sources	All import sources	All sources
2021	January	***	***	***	***
2021	February	***	***	***	***
2021	March	***	***	***	***
2021	April	***	***	***	***
2021	May	***	***	***	***
2021	June	***	***	***	***
2021	July	***	***	***	***
2021	August	***	***	***	***
2021	September	***	***	***	***
2021	October	***	***	***	***
2021	November	***	***	***	***
2021	December	***	***	***	***
2022	January	***	***	***	***
2022	February	***	***	***	***
2022	March	***	***	***	***
2022	April	***	***	***	***
2022	May	***	***	***	***
2022	June	***	***	***	***
2022	July	***	***	***	***
2022	August	***	***	***	***
2022	September	***	***	***	***
2022	October	***	***	***	***
2022	November	***	***	***	***
2022	December	***	***	***	***

Table continued.

Table IV-15 Continued

Paper plates: U.S. producers' U.S. shipments, U.S. importers' U.S. imports, by month and source

Quantity in 1,000 units

Year	Month	U.S. producers	China	Thailand	Vietnam
2023	January	***	***	***	***
2023	February	***	***	***	***
2023	March	***	***	***	***
2023	April	***	***	***	***
2023	May	***	***	***	***
2023	June	***	***	***	***
2023	July	***	***	***	***
2023	August	***	***	***	***
2023	September	***	***	***	***
2023	October	***	***	***	***
2023	November	***	***	***	***
2023	December	***	***	***	***
2024	January	***	***	***	***
2024	February	***	***	***	***
2024	March	***	***	***	***
2024	April	***	***	***	***
2024	May	***	***	***	***
2024	June	***	***	***	***

Table continued.

Table IV-15 Continued

Paper plates: U.S. producers' U.S. shipments, U.S. importers' U.S. imports, by month and source

Quantity in 1,000 units

Year	Month	Subject sources	Nonsubject sources	All import sources	All sources
2023	January	***	***	***	***
2023	February	***	***	***	***
2023	March	***	***	***	***
2023	April	***	***	***	***
2023	May	***	***	***	***
2023	June	***	***	***	***
2023	July	***	***	***	***
2023	August	***	***	***	***
2023	September	***	***	***	***
2023	October	***	***	***	***
2023	November	***	***	***	***
2023	December	***	***	***	***
2024	January	***	***	***	***
2024	February	***	***	***	***
2024	March	***	***	***	***
2024	April	***	***	***	***
2024	May	***	***	***	***
2024	June	***	***	***	***

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

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

Figure IV-8

Paper plates: U.S. imports from individual subject sources, by source and by month

* * * * *

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

Figure IV-9

Paper plates: U.S. imports from aggregated subject and nonsubject sources, by month

* * * * *

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

Apparent U.S. consumption and market shares

Quantity

Table IV-16 and figure IV-10 present data on apparent U.S. consumption and U.S. market shares by quantity for paper plates. U.S. consumption, by quantity, remained stable during 2021-23, but was *** percent higher in interim 2024 compared to interim 2023. U.S. producers' market share decreased from *** percent to *** percent during 2021-23 and was *** percent in interim 2024 compared to *** percent in interim 2023. The market share of subject imports increased from *** percent to *** percent during 2021-23 and was *** percent in interim 2024 compared to *** percent in interim 2023. During 2021-23, the market shares of subject import from China increased by *** percentage points, while the market shares of subject imports from Thailand and Vietnam increased by *** percentage points and *** percentage points, respectively. Nonsubject imports of paper plates accounted for *** percent share of quantity during 2021-22 and during the interim periods.

Table IV-16
Paper plates: Apparent U.S. consumption and market shares based on quantity, by source and period

Quantity in 1,000 units; shares in percent

Source	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
U.S. producers	Quantity	52,471,202	50,716,568	50,071,508	24,974,584	26,230,272
China	Quantity	***	***	***	***	***
Thailand	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Thailand	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure IV-10
Paper plates: Apparent U.S. consumption based on quantity, by source and period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires

Table IV-17 and figure IV-11 present data on apparent U.S. consumption and U.S. market shares by quantity for paper plates on a monthly basis from January 2021 to June 2024. Between January 2021 and April 2022 U.S. producers' market share ranged from *** percent to *** percent and subsequently, U.S. producers' market share reached that range in one month, April 2023 (*** percent).

Table IV-17

Paper plates: Shares of U.S. producers' U.S. shipments and U.S. importers' U.S. imports, by month and source

Shares in percent

Year	Month	U.S. producers	Subject sources	Nonsubject sources	All import sources	All sources
2021	January	***	***	***	***	100.0
2021	February	***	***	***	***	100.0
2021	March	***	***	***	***	100.0
2021	April	***	***	***	***	100.0
2021	May	***	***	***	***	100.0
2021	June	***	***	***	***	100.0
2021	July	***	***	***	***	100.0
2021	August	***	***	***	***	100.0
2021	September	***	***	***	***	100.0
2021	October	***	***	***	***	100.0
2021	November	***	***	***	***	100.0
2021	December	***	***	***	***	100.0
2022	January	***	***	***	***	100.0
2022	February	***	***	***	***	100.0
2022	March	***	***	***	***	100.0
2022	April	***	***	***	***	100.0
2022	May	***	***	***	***	100.0
2022	June	***	***	***	***	100.0
2022	July	***	***	***	***	100.0
2022	August	***	***	***	***	100.0
2022	September	***	***	***	***	100.0
2022	October	***	***	***	***	100.0
2022	November	***	***	***	***	100.0
2022	December	***	***	***	***	100.0

Table continued.

Table IV-17 Continued

Paper plates: Shares of U.S. producers' U.S. shipments and U.S. importers' U.S. imports, by month and source

Shares in percent

Year	Month	U.S. producers	Subject sources	Nonsubject sources	All import sources	All sources
2023	January	***	***	***	***	100.0
2023	February	***	***	***	***	100.0
2023	March	***	***	***	***	100.0
2023	April	***	***	***	***	100.0
2023	May	***	***	***	***	100.0
2023	June	***	***	***	***	100.0
2023	July	***	***	***	***	100.0
2023	August	***	***	***	***	100.0
2023	September	***	***	***	***	100.0
2023	October	***	***	***	***	100.0
2023	November	***	***	***	***	100.0
2023	December	***	***	***	***	100.0
2024	January	***	***	***	***	100.0
2024	February	***	***	***	***	100.0
2024	March	***	***	***	***	100.0
2024	April	***	***	***	***	100.0
2024	May	***	***	***	***	100.0
2024	June	***	***	***	***	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure IV-11

Paper plates: U.S. producers' U.S. importers' market shares, by month and source

* * * * *

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

Value

Table IV-18 and figure IV-12 present data on apparent U.S. consumption and U.S. market shares by value for paper plates. U.S. consumption, by value, increased by *** percent during 2021-23 and was *** percent higher in interim 2024 compared to interim 2023. U.S. producers' market share decreased from *** percent in 2021 to *** percent in 2022 before increasing to *** percent in 2023 and was *** percent in interim 2024 compared to *** percent in interim 2023. The market share of subject imports increased from *** percent in 2021 to *** percent in 2022 before decreasing to *** percent in 2023 and was *** percent in interim 2024 compared to *** percent in interim 2023. During 2021-23, the market shares of subject import from China increased irregularly by *** percentage points, while the market shares of subject imports from Thailand and Vietnam increased by *** percentage points and *** percentage points, respectively. Nonsubject imports of paper plates accounted for *** percent share of quantity during 2021-22 and during the interim periods.

Table IV-18**Paper plates: Apparent U.S. consumption and market shares based on value, by source and period**

Value in 1,000 dollars; shares in percent

Source	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
U.S. producers	Value	2,245,358	2,654,288	2,871,044	1,420,230	1,441,263
China	Value	***	***	***	***	***
Thailand	Value	***	***	***	***	***
Vietnam	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
All sources	Value	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Thailand	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure IV-12
Paper plates: Apparent U.S. consumption based on value, by source and period

* * * * *

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

Part V: Pricing data

Factors affecting prices

Raw material costs

Raw materials account for a large share of U.S. producers' cost of producing paper plates. During 2021 to 2023, raw materials as a percentage of cost of goods sold usually accounted for roughly 60 percent of the costs of goods sold (60.9 percent in 2021, 61.8 percent in 2022, and 59.4 percent in 2023). Raw materials as a percentage of costs of goods sold were 58.6 percent in January-June 2024, down slightly from 59.6 percent in January-June 2023.

The principal raw material used in production of paper plates is paperboard.¹ The producer price index ("PPI") for paperboard is shown in table V-1 and figure V-1. This PPI rose over 32 percent from January 2021 to November 2022. After November 2022, it decreased and then was mostly stable at approximately 20 percent above its January 2021 level.²

¹ Petition, p. 6.

² These trends are similar to but not the same as ***. See petitioners' postconference brief, *** and petitioners' prehearing brief, exhibit 3.

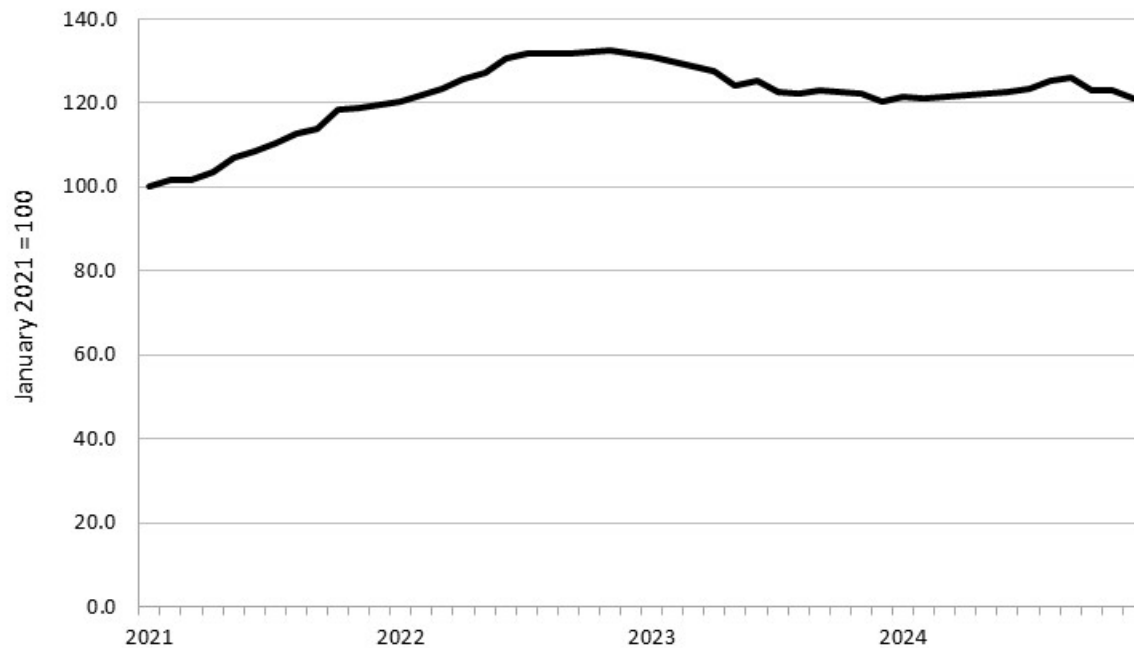
Table V-1
Raw materials: Paperboard, producer price index, monthly, not seasonally adjusted,
January 2021-December 2024

Index, January 2021=100.0

Month	2021	2022	2023	2024
January	100.0	120.2	131.1	121.4
February	101.5	121.8	129.8	121.2
March	101.8	123.4	128.6	121.4
April	103.7	125.8	127.5	121.9
May	106.9	127.1	124.3	122.3
June	108.5	130.8	125.5	122.7
July	110.4	131.7	122.8	123.3
August	112.6	131.7	122.4	125.3
September	114.0	131.8	123.0	125.9
October	118.4	132.1	122.5	123.0
November	118.6	132.5	122.4	122.9
December	119.5	131.8	120.5	121.0

Source: Bureau of Labor Statistics via Federal Reserve Bank of St. Louis, retrieved January 31, 2025 and November 5, 2024, and staff calculations. <https://fred.stlouisfed.org/series/WPU0914>

Figure V-1
Raw materials: Producer price index, paperboard, January 2021-December 2024



Source: Bureau of Labor Statistics via Federal Reserve Bank of St. Louis, retrieved January 31, 2025 and November 5, 2024, and staff calculations. <https://fred.stlouisfed.org/series/WPU0914>

U.S. producers and importers were asked about the trends in raw material costs since January 1, 2021. Four U.S. producers and six importers described raw material costs as increasing steadily. Four U.S. producers and 12 importers described raw material costs as increasing with fluctuations. Firms attributed cost increases to inflation, the COVID-19 pandemic, or wood pulp cost increases. Three U.S. producers estimated that paperboard costs increased somewhere between 45 to 60 percent since January 1, 2021. *** described the costs of paperboard as spiking upwards in 2022 and 2023. It also described the costs of film and wrapping as having increased since 2021.

Three U.S. producers (***) and importers *** also stated that they were unable to increase paper plate prices to cover the increased costs of raw materials due to competition from subject imports. One U.S. producer (***) also noted that the raw material costs are changing more than what it can afford to change the selling price of its paper plates. U.S. producer *** stated that it increased its sales prices of paper plates to cover increased raw material costs. Importer *** described the raw material used for U.S. paper plates as solid bleach sulfates (SBS) paperboard, while Asian paper plates are made from folding box board (FBB). It described FBB as having higher yield for paper plate production but similar performance for paper plate use. It continued that North American SBS costs have risen, while Asian FBB costs have not.³

In additional comments, importer *** described paperboard costs as increasing from \$*** per ton in January 2021 to \$*** per ton in January 2023 before leveling off at \$*** per ton in June 2024. U.S. producer *** described current raw material costs as approximately 15 percent lower than at their peak. Additionally, three importers indicated that such costs had decreased with fluctuations since January 1, 2021, two importers described raw material costs as unchanged, and one (***) described costs as fluctuating both up and down.

U.S. producers and importers reporting using raw material indexes in their contracts included U.S. producers *** and importers ***. All these firms reported using RISI data for pulp and/or paperboard.

Purchasers were asked if they were familiar with the costs of raw materials used in the production of paper plates. Ten responded that they were, seven indicated that they were not,

³ See also ***.

and *** responded that it was familiar with the raw materials for commodity paper plates but not for specialty paper plates. Firms that indicated they were familiar were asked if information on raw materials had affected their negotiations or contracts to purchase paper plates since January 1, 2021. Six purchasers (plus one that had indicated it was not familiar with raw material costs) responded that such information had, while four (plus five that indicated that they were not familiar with raw material costs) indicated that such information had not. *** stated that price negotiations include the costs of paper pulp. *** described itself as aware of costs when negotiating. *** stated that paper plate prices fluctuate based on paperboard costs. *** stated that raw material costs have fluctuated, resulting in some paper plate suppliers requesting mid-contract offsetting price increases. *** described paperboard costs as having increased in 2021 and 2022 due to paperboard demand exceeding supply before falling in 2023. *** continued that in 2021 and 2022, paper plates prices had risen in response to rising paperboard prices, while it asked for and received price reductions in 2023. *** stated that information on raw material costs provides baseline data to negotiate paper plates prices. *** described paperboard costs as steadily increasing through 2023 before decreasing in 2024, and its paper plates supplier (***) passed on the cost savings.

Transportation costs to the U.S. market

Transportation costs for paper plates shipped from subject countries to the United States averaged 13.3 percent for China, 9.2 percent for Thailand, and 11.2 percent for Vietnam during 2023. These estimates were derived from official import data and represent the transportation and other charges on imports.⁴

U.S. inland transportation costs

Seven responding U.S. producers and 18 importers reported that they typically arrange transportation to their customers. One U.S. producer (***) and seven importers stated that their purchasers do.⁵ All eight responding U.S. producers reported that their U.S. inland transportation costs ranged from 2.6 to 8.0 percent while 15 importers reported costs of

⁴ The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2023 and then dividing by the customs value based on the HTS statistical reporting number HTS statistical reporting number 4823.69.0040, accessed October 8, 2024.

⁵ Some retailer importers (e.g. ***) reported they arranged transportation, and other retailer importers (e.g., ***) reported that their purchasers do.

0.1 to 7.0 percent. Five importers reported U.S. inland transportation costs of 10.0 to 20.0 percent. Twenty-three importers stated that they shipped paper plates from a storage facility while two (***) stated that they shipped from their point of importation.

Pricing practices

Pricing methods

U.S. producers and importers reported setting prices using multiple methods, including transaction-by-transaction negotiations, contracts, and price lists (table V-2).

Table V-2
Paper plates: Count of U.S. producers' and importers' reported price setting methods

Method	U.S. producers	Importers
Transaction-by-transaction	5	10
Contract	5	9
Set price list	6	13
Other	0	4
Responding firms	8	26

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

Note: The sum of responses down may not add up to the total number of responding firms as each firm was instructed to check all applicable price setting methods employed. Firms that indicated "other" generally described retail pricing to consumers.

U.S. producers reported selling the majority of their paper plates in the spot market but also had sales under contracts of multiple lengths (table V-3). Importers sold the majority of their paper plates under long-term contracts but also sold some paper plates using annual contracts and spot sales.

Table V-3
Paper plates: U.S. producers' and importers' shares of commercial U.S. shipments by type of sale, 2023

Share in percent

Type of sale	U.S. producers	Subject importers
Long-term contracts	***	***
Annual contracts	***	***
Short-term contracts	***	***
Spot sales	***	***
Total	100.0	100.0

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

Note: Because of rounding, figures may not add to the totals shown.

Four U.S. producers indicated that their short-term contracts ranged from 90 to 273 days, allowed price renegotiation for two U.S. producers (and not for two others), fixed price and quantity (two U.S. producers) or just price (one U.S. producer), and were not indexed to raw material costs (three U.S. producers) or were (one U.S. producer).

Responding importers reported that their short-term contracts ranged from 30 to 180 days, did not allow price renegotiation, fixed price (two importers) or price and quantity (two importers), were indexed to raw material costs (two importers) or were not (two importers).

U.S. producers indicated that their annual contracts allowed price renegotiation for two U.S. producers (and not for one other), fixed price (two U.S. producers) or price and quantity (one U.S. producer), and were not indexed to raw material costs (three U.S. producers) or were (two U.S. producers).

Responding importers reported that their annual contracts allowed price renegotiation (four importers) or did not allow price renegotiation (two importers), fixed price (five importers), were indexed to raw material costs (two importers) or were not (two importers).

U.S. producers indicated that their long-term contracts ranged from two to four years (although three of five indicated only two years), allowed price renegotiation for two U.S. producers (and not for two others), fixed price and quantity (one U.S. producer) or only price (one U.S. producer), and were indexed to raw material costs (five U.S. producers).

Importers reported that their long-term contracts were for two years, allowed price renegotiation (one importer) or did not allow price renegotiation (another importer), fixed price (two importers), were indexed to raw material costs (one importer) or were not (another importer).

Eight purchasers reported that they purchase product daily, seven purchase weekly, three purchase monthly, one purchases quarterly, one purchases annually, and three reported another purchase frequency. Of purchasers reporting another purchasing frequency, two reported purchasing on an as-needed basis, and two reported purchasing on a one-time basis. *** stated that its purchase frequency varies by type of paper plates (e.g., seasonal) purchased. It added that it purchases some paper plates daily, domestic paper plates *** imported paper plates ***, and seasonal paper plates annually. Seventeen purchasers reported that their purchasing frequency had not changed since 2021. *** stated that its purchasing frequency had changed based on demand.

Eight purchasers contact two to eight suppliers before making a purchase, while five indicated that they may contact as few as one supplier, and two indicated that they may contact more than eight.

Fourteen purchasers indicated that their purchases involve negotiations with suppliers, while four stated that they did not. Those purchasers that negotiated stated that negotiations were based on numerous factors including quality, service, price/cost, supplier capacity, and lead times. *** stated that it negotiated ***. Five purchasers stated that they did not share competing prices with suppliers.

Sales terms and discounts

Eight U.S. producers and eight importers typically quote prices on a delivered basis, while two U.S. producers and 19 importers quoted prices on a f.o.b. basis.⁶

Three U.S. producers and 20 importers indicated that they typically offered no discounts. Four U.S. producers and two importers offered annual volume discounts. *** and three importers offered quantity discounts. Other discounts included customer-specific discounts and discounts for early payment terms.

Price leadership

Thirteen purchasers indicated that there was at least one price leader in the paper plates market. Five purchasers listed retailer Walmart as a price leader, three listed AJM Packaging, three listed Georgia-Pacific, and two listed Dart Container. Other firms listed by one purchaser each as price leaders included retailer Aldi, Amscan, Aspen Products, retailer Dollar General, Hoffmaster, Huhtamaki Americas, and retailer Target. Purchaser *** described Georgia-Pacific as leading because it is one of the largest suppliers, while purchaser *** described Georgia-Pacific as leading not only through the large Dixie brand, but also by offering the lowest price with customization. Purchaser *** described Dart Container as offering the “best price per plate,” and purchaser *** described Hoffmaster as offering the lowest cost while meeting the same specifications as other suppliers. Purchaser *** described AJM Packaging as leading by raising prices “almost quarterly” in 2021 and 2022, while purchaser *** described AJM Packaging as leading through transparency in paperboard prices. Purchasers citing retailers as price leaders, especially ***, described such retailers as leading through low sales prices to consumers.

⁶ Two U.S. producers and two importers reported both f.o.b. and delivered sales. Many of the importers reporting f.o.b. sales were retailers.

Price and purchase cost data

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following paper plates products shipped to unrelated U.S. customers during January 2021-June 2024. Firms that imported these products from China, Thailand, and/or Vietnam for retail sale were requested to provide import purchase cost data.

Product 1.--8.375"-9.0" round uncoated white paper plates, 0.010-0.012 inch caliper, 90-120 count per package, in shrink wrap and/or bags for individual sale.

Product 2.--8.375" – 8.75" round coated and printed paper plates, 0.013-0.016 inch caliper, printed with 35 percent or less ink coverage, 90-120 count per package, packaged in shrink wrap and/or bags for individual sale.

Product 3.--10.0" – 10.25" round coated and printed paper plates, 0.018-0.022 inch caliper, printed with 35 percent or less ink coverage, 43-50 count per package, packaged in shrink wrap and/or bags for individual sale.

Product 4.--7.0" round solid (non-metallic) color paper plates, 0.012-0.015 inch caliper, 24 count per package, packaged in shrink wrap and/or bags for individual sale.

Price data

Eight U.S. producers and two importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.⁷ Pricing data reported by these firms accounted for approximately 17.7 percent of U.S. producers' shipments of paper plates, 2.0 percent of subject imports from China, 26.8 percent of subject imports from Thailand, and 21.3 percent of subject imports from Vietnam in 2023. In

⁷ Per-unit pricing data are calculated from total quantity and total value data provided by U.S. producers and importers. The precision and variation of these figures may be affected by rounding, limited quantities, and producer or importer estimates. When firms reported number of paper plates in a quarter less than 500 as 0, staff deleted data for these quarters of data. ***. ***. ***.

their posthearing brief, petitioners noted that paper plates are available in a wide variety of sizes and packaging, making it difficult to have higher coverage of the entire market with a measured number of pricing products.⁸

Price data for products 1-4 are presented in tables V-4 to V-7 and figures V-2 to V-5.

Table V-4
Paper plates: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by quarter

Price in dollars per 1,000 units, quantity in 1,000 units, margin in percent.

Period	U.S. price	U.S. quantity
2021 Q1	***	***
2021 Q2	***	***
2021 Q3	***	***
2021 Q4	***	***
2022 Q1	***	***
2022 Q2	***	***
2022 Q3	***	***
2022 Q4	***	***
2023 Q1	***	***
2023 Q2	***	***
2023 Q3	***	***
2023 Q4	***	***
2024 Q1	***	***
2024 Q2	***	***

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

Note: Product 1: 8.375"-9.0" round uncoated white paper plates, 0.010-0.012 inch caliper, 90-120 count per package, in shrink wrap and/or bags for individual sale. No data were received for imports from subject countries.

⁸ Petitioners' posthearing brief, exhibit 1, pp. 1-2, 4.

Figure V-2
Paper plates: Weighted-average prices and quantities of domestic and imported product 1, by quarter

Price of product 1

* * * * *

Volume of product 1

* * * * *

Compiled from data submitted in response to Commission questionnaires.

Note: Product 1: 8.375"-9.0" round uncoated white paper plates, 0.010-0.012 inch caliper, 90-120 count per package, in shrink wrap and/or bags for individual sale.

Table V-5**Paper plates: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by quarter**

Price in dollars per 1,000 units, quantity in 1,000 units, margin in percent.

Period	U.S. price	U.S. quantity	China price	China quantity	China margin	Thailand price	Thailand quantity	Thailand margin
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***	***	***
2024 Q2	***	***	***	***	***	***	***	***

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

Note: Product 2: 8.375" – 8.75" round coated and printed paper plates, 0.013-0.016 inch caliper, printed with 35 percent or less ink coverage, 90-120 count per package, packaged in shrink wrap and/or bags for individual sale. No data were received for imports from Vietnam.

Figure V-3
Paper plates: Weighted-average prices and quantities of domestic and imported product 2, by quarter

Price of product 2

* * * * *

Volume of product 2

* * * * *

Compiled from data submitted in response to Commission questionnaires.

Note: Product 2: 8.375" – 8.75" round coated and printed paper plates, 0.013-0.016 inch caliper, printed with 35 percent or less ink coverage, 90-120 count per package, packaged in shrink wrap and/or bags for individual sale.

Table V-6

Paper plates: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by quarter

Price in dollars per 1,000 units, quantity in 1,000 units, margin in percent.

Period	U.S. price	U.S. quantity	China price	China quantity	China margin	Thailand price	Thailand quantity	Thailand margin
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***	***	***
2024 Q2	***	***	***	***	***	***	***	***

Period	Vietnam price	Vietnam quantity	Vietnam margin
2021 Q1	***	***	***
2021 Q2	***	***	***
2021 Q3	***	***	***
2021 Q4	***	***	***
2022 Q1	***	***	***
2022 Q2	***	***	***
2022 Q3	***	***	***
2022 Q4	***	***	***
2023 Q1	***	***	***
2023 Q2	***	***	***
2023 Q3	***	***	***
2023 Q4	***	***	***
2024 Q1	***	***	***
2024 Q2	***	***	***

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

Note: Product 3: 10.0” – 10.25” round coated and printed paper plates, 0.018-0.022 inch caliper, printed with 35 percent or less ink coverage, 43-50 count per package, packaged in shrink wrap and/or bags for individual sale.

Note: Importer ***

Figure V-4

Paper plates: Weighted-average prices and quantities of domestic and imported product 3, by quarter

Price of product 3

* * * * *

Volume of product 3

* * * * *

Compiled from data submitted in response to Commission questionnaires.

Note: Product 3: 10.0" – 10.25" round coated and printed paper plates, 0.018-0.022 inch caliper, printed with 35 percent or less ink coverage, 43-50 count per package, packaged in shrink wrap and/or bags for individual sale.

Table V-7**Paper plates: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by quarter**

Price in dollars per 1,000 units, quantity in 1,000 units, margin in percent.

Period	U.S. price	U.S. quantity	China price	China quantity	China margin	Vietnam price	Vietnam quantity	Vietnam margin
2021 Q1	***	***	***	***	***	***	***	***
2021 Q2	***	***	***	***	***	***	***	***
2021 Q3	***	***	***	***	***	***	***	***
2021 Q4	***	***	***	***	***	***	***	***
2022 Q1	***	***	***	***	***	***	***	***
2022 Q2	***	***	***	***	***	***	***	***
2022 Q3	***	***	***	***	***	***	***	***
2022 Q4	***	***	***	***	***	***	***	***
2023 Q1	***	***	***	***	***	***	***	***
2023 Q2	***	***	***	***	***	***	***	***
2023 Q3	***	***	***	***	***	***	***	***
2023 Q4	***	***	***	***	***	***	***	***
2024 Q1	***	***	***	***	***	***	***	***
2024 Q2	***	***	***	***	***	***	***	***

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

Note: Product 4: 7.0" round solid (non-metallic) color paper plates, 0.012-0.015 inch caliper, 24 count per package, packaged in shrink wrap and/or bags for individual sale. No data were received for imports from Thailand.

Figure V-5
Paper plates: Weighted-average prices and quantities of domestic and imported product 4, by quarter

Price of product 4

* * * * *

Volume of product 4

* * * * *

Compiled from data submitted in response to Commission questionnaires.

Note: Product 4: 7.0" round solid (non-metallic) color paper plates, 0.012-0.015 inch caliper, 24 count per package, packaged in shrink wrap and/or bags for individual sale.

Import purchase cost data

One importer, ***, reported useable import purchase cost data for product 1.⁹ Purchase cost data reported by *** accounted for *** percent of imports from China in 2023. Landed duty paid purchase cost data for imports from China are presented in table V-8 and figure V-6, along with U.S. producers' sales prices.¹⁰

Importers reporting import purchase cost data were asked to provide additional information regarding the costs and benefits of directly importing paper plates.

*** reported that it incurred additional costs beyond landed duty-paid costs by importing paper plates directly. These costs were ***.

Firms were also asked to describe how these additional costs incurred by importing paper plates directly compares with additional costs incurred when purchasing from a U.S. producer or U.S. importer. ***. Similarly, ***.

*** identified benefits from importing paper plates directly instead of purchasing from U.S. producers or importers, including ***

⁹ ***. See email from ***, ***. Importer ***. Staff contacted both ***. See emails from ***.

¹⁰ LDP import value does not include any potential additional costs that a purchaser may incur by importing rather than purchasing from another importer or U.S. producer. Price-cost differences are based on LDP import values whereas margins of underselling/overselling are based on importer sales prices.

***.

Firms were also asked whether the import cost (both excluding and including additional costs) of paper plates they imported are lower than the price of purchasing paper plates from a U.S. producer or importer.

*** estimated that it saved *** percent of the purchase price by importing paper plates rather than purchasing from a U.S. importer. It added that it saved *** percent compared to purchasing the product from a U.S. producer.¹¹

Table V-8
Paper plates: Import landed duty-paid purchase costs and domestic prices, quantities of product 1, and price-cost differentials, by quarter

Price and LDP value in dollars per 1,000 units, quantity in 1,000 units, price-cost differential in percent.

Period	U.S. price	U.S. quantity	China LDP unit cost	China quantity	China Price-cost differential
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***
2023 Q3	***	***	***	***	***
2023 Q4	***	***	***	***	***
2024 Q1	***	***	***	***	***
2024 Q2	***	***	***	***	***

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

Note: Product 1: 8.375"-9.0" round uncoated white paper plates, 0.010-0.012 inch caliper, 90-120 count per package, in shrink wrap and/or bags for individual sale.

Note: U.S. producer price data are the same as those presented in table V-4.

¹¹ *** reported that *** based *** estimates on ***.

Figure V-6

Paper plates: U.S. producer prices and import purchase costs, and quantities, of product 1, by quarter

U.S. price and import purchase cost of product 1

* * * * *

Volume of product 1

* * * * *

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

Note: Product 1: 8.375"-9.0" round uncoated white paper plates, 0.010-0.012 inch caliper, 90-120 count per package, in shrink wrap and/or bags for individual sale.

Price and purchase cost trends

In general, prices increased during January 2021-June 2024. Table V-9 summarizes the price trends, by country and by product. As shown in the table, domestic price increases ranged from 12.4 to 48.2 percent during January 2021-June 2024. There were no import price or landed-duty paid cost trends that exceeded 9 quarters for any subject country. ***.

Table V-9
Paper plates: Summary of price and cost data, by product and source

Volume in 1,000 units, price and cost in dollars per 1,000 units, change in percent

Product	Source	Number of quarters	Volume of shipments	Low price/cost	High price/cost	First quarter price/cost	Last quarter price/cost	Percent change in price/cost over period
Product 1	United States	***	***	***	***	***	***	***
Product 1	China price	***	***	***	***	***	***	***
Product 1	China cost	***	***	***	***	***	***	***
Product 1	Thailand price	***	***	***	***	***	***	***
Product 1	Thailand cost	***	***	***	***	***	***	***
Product 1	Vietnam price	***	***	***	***	***	***	***
Product 1	Vietnam cost	***	***	***	***	***	***	***
Product 2	United States	***	***	***	***	***	***	***
Product 2	China price	***	***	***	***	***	***	***
Product 2	China cost	***	***	***	***	***	***	***
Product 2	Thailand price	***	***	***	***	***	***	***
Product 2	Thailand cost	***	***	***	***	***	***	***
Product 2	Vietnam price	***	***	***	***	***	***	***
Product 2	Vietnam cost	***	***	***	***	***	***	***
Product 3	United States	***	***	***	***	***	***	***
Product 3	China price	***	***	***	***	***	***	***
Product 3	China cost	***	***	***	***	***	***	***
Product 3	Thailand price	***	***	***	***	***	***	***
Product 3	Thailand cost	***	***	***	***	***	***	***
Product 3	Vietnam price	***	***	***	***	***	***	***
Product 3	Vietnam cost	***	***	***	***	***	***	***
Product 4	United States	***	***	***	***	***	***	***
Product 4	China price	***	***	***	***	***	***	***
Product 4	China cost	***	***	***	***	***	***	***
Product 4	Thailand price	***	***	***	***	***	***	***
Product 4	Thailand cost	***	***	***	***	***	***	***
Product 4	Vietnam price	***	***	***	***	***	***	***
Product 4	Vietnam cost	***	***	***	***	***	***	***

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

Note: Percentage change from the first quarter in which data were available in 2021 to the last quarter in which data were available in 2024.

Price and purchase cost comparisons

Price comparisons

As shown in tables V-10 to V-12, prices for product imported from subject countries were below those for U.S.-produced product in 23 of 35 instances (340 million paper plates); margins of underselling ranged from 0.1 to 24.3 percent. In the remaining 12 instances (91 million paper plates), prices for product from subject countries were between 0.6 and 42.9 percent above prices for the domestic product.

Over half of the underselling occurred in ***. Volumes and instances of underselling exceeded overselling ***.

Table V-10
Paper plates: Instances of underselling and overselling and the range and average of margins, by product

Quantity in 1,000 units; margin in percent

Product	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	***	***	***	***	***
Product 2	Underselling	***	***	***	***	***
Product 3	Underselling	***	***	***	***	***
Product 4	Underselling	***	***	***	***	***
Total	Underselling	23	340,144	8.8	0.1	24.3
Product 1	Overselling	***	***	***	***	***
Product 2	Overselling	***	***	***	***	***
Product 3	Overselling	***	***	***	***	***
Product 4	Overselling	***	***	***	***	***
Total	Overselling	12	90,619	(11.2)	(0.6)	(42.9)

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

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Table V-11**Paper plates: Instances of underselling and overselling and the range and average of margins, by source**

Quantity in 1,000 units; margin in percent

Source	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
China	Underselling	***	***	***	***	***
Thailand	Underselling	***	***	***	***	***
Vietnam	Underselling	***	***	***	***	***
Total	Underselling	23	340,144	8.8	0.1	24.3
China	Overselling	***	***	***	***	***
Thailand	Overselling	***	***	***	***	***
Vietnam	Overselling	***	***	***	***	***
Total	Overselling	12	90,619	(11.2)	(0.6)	(42.9)

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

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Table V-12**Paper plates: Instances of underselling and overselling and the range and average of margins, by period**

Quantity in 1,000 units; margin in percent

Period	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
2021	Underselling	***	***	***	***	***
2022	Underselling	***	***	***	***	***
2023	Underselling	***	***	***	***	***
January-June 2024	Underselling	***	***	***	***	***
Total, all periods	Underselling	23	340,144	8.8	0.1	24.3
2021	Overselling	***	***	***	***	***
2022	Overselling	***	***	***	***	***
2023	Overselling	***	***	***	***	***
January-June 2024	Overselling	***	***	***	***	***
Total, all periods	Overselling	12	90,619	(11.2)	(0.6)	(42.9)

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

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Price-cost comparisons

As shown in table V-13 to V-14, landed duty-paid costs for paper plates imported from China were between *** and *** percent above sales prices for the domestic product.

Table V-13
Paper plates: Instances of lower and higher import purchase costs and the range and average of price-cost differentials, by product

Quantity in 1,000 units; price-cost differential in percent

Product	Type	Number of quarters	Quantity	Average price-cost differential	Min price-cost differential	Max price-cost differential
Product 1	Lower than U.S. price	***	***	***	***	***
Total	Lower than U.S. price	***	***	***	***	***
Product 1	Higher than U.S. price	***	***	***	***	***
Total	Higher than U.S. price	***	***	***	***	***

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

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Table V-14
Paper plates: Instances of lower and higher import purchase costs and the range and average of price-cost differentials, by period

Quantity in 1,000 units; price-cost differential in percent

Period	Type	Number of quarters	Quantity	Average price-cost differential	Min price-cost differential	Max price-cost differential
2021	Lower than U.S. price	***	***	***	***	***
2022	Lower than U.S. price	***	***	***	***	***
2023	Lower than U.S. price	***	***	***	***	***
January-June 2024	Lower than U.S. price	***	***	***	***	***
Total, all periods	Lower than U.S. price	***	***	***	***	***
2021	Higher than U.S. price	***	***	***	***	***
2022	Higher than U.S. price	***	***	***	***	***
2023	Higher than U.S. price	***	***	***	***	***
January-June 2024	Higher than U.S. price	***	***	***	***	***
Total, all periods	Higher than U.S. price	8	163,388	(21.3)	(6.9)	(34.0)

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

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Lost sales and lost revenue

In the preliminary phase of these investigations, the Commission requested that U.S. producers of paper plates report purchasers with which they experienced instances of lost sales or revenue due to competition from imports of paper plates from China, Thailand, and/or Vietnam during January 2020-September 2023.

Six U.S. producers submitted lost sales and lost revenue allegations. The six responding U.S. producers identified 17 firms with which they lost sales or revenue (1 consisting of lost sales allegations, 1 consisting of lost revenue allegations, and 15 consisting of both types of allegations). China was listed as a subject country in allegations involving 16 of the 17 purchasers, Vietnam was listed in allegations involving 3 purchasers, and Thailand was listed in allegations involving 1 purchaser.

In the final phase of the investigations, of the eight responding U.S. producers, *** reported that they had to either reduce prices or roll back announced price increases, and *** firms reported that they had lost sales.

Staff contacted approximately 45 purchasers and received responses from 18 purchasers.¹² Responding purchasers reported purchasing and importing 132.8 billion paper plates during January 2021-June 2024 (table V-15).

As shown in table V-16, of the 18 responding purchasers, 14 reported that, since 2021, they had purchased imported paper plates from subject countries instead of U.S.-produced product. Eleven listed China, three listed Thailand, and seven listed Vietnam. Eleven of these purchasers reported that subject import prices were lower than U.S.-produced product, and three (***) of these purchasers reported that price was a primary reason for the decision to purchase imported product rather than U.S.-produced product.

Two purchasers estimated the quantity of paper plates from subject countries purchased instead of domestic product; quantities ranged from *** paper plates to *** paper plates (table V-17). Purchasers identified surety of supply, special designs, specific sizes and shapes, and lack of domestic availability as non-price reasons for purchasing imported rather than U.S.-produced product.

Of the 17 responding purchasers, 3 reported that U.S. producers had reduced prices in order to compete with lower-priced imports from subject countries; five reported that they did

¹² Purchaser *** submitted a lost sales lost revenue survey response in the preliminary phase but did not submit a purchaser questionnaire response in the final phase.

Table V-16
Paper plates: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Quantity in 1,000 units

Purchaser	Purchased subject imports instead of domestic	Imports priced lower	Choice based on price	Quantity	Explanation
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	*** ***
***	***	***	***	***	***
***	***	***	***	***	***

Table continued.

Table V-16 Continued.

Paper plates: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Quantity in 1,000 units

Purchaser	Purchased subject imports instead of domestic	Imports priced lower	Choice based on price	Quantity	Explanation
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

Table continued.

Table V-16 Continued.

Paper plates: Purchasers' responses to purchasing subject imports instead of domestic product, by firm

Quantity in 1,000 units

Purchaser	Purchased subject imports instead of domestic	Imports priced lower	Choice based on price	Quantity	Explanation
***	***	***	***	***	***
***	***	***	***	***	***
All firms	Yes--14; No--4	Yes--11; No--2	Yes--3; No--11	***	NA

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

Note: ***

Table V-17

Paper plates: Purchasers' responses to purchasing subject imports instead of domestic product, by source

Quantity in 1,000 units

Source	Count of purchasers reporting subject imports instead of domestic	Count of purchasers reported that imports were priced lower	Count of purchasers reporting that price was a primary reason for shift	Quantity
China	11	10	2	***
Thailand	3	2	---	***
Vietnam	7	6	1	***
Any subject source	14	11	3	***

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

Table V-19**Paper plates: Purchasers' responses to U.S. producer price reductions, by source**

Source	Count of purchasers reporting U.S. producers reduced prices	Average percent of estimated U.S. price reduction	Range of percent of estimated U.S. price reductions
China	1	***	***
Thailand	---	***	***
Vietnam	3	***	***
Total / average	3	***	***

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

Note: See text for discussion of ***.

Part VI: Financial experience of U.S. producers

Background¹

Eight U.S. producers provided financial results on their paper plate operations. All U.S. producers reported financial data on a calendar-year basis and seven of the responding U.S. producers provided their financial data on the basis of GAAP.^{2 3}

Figure VI-1 presents each firm's share of the total reported net sales quantity in 2023. As shown in the figure *** is the largest U.S. producer by net sales quantity, followed by ***. Collectively, these four companies accounted for *** percent of total net sales volume in 2023.

¹ The following abbreviations are used in the tables and/or text of this section: generally accepted accounting principles ("GAAP"), fiscal year ("FY"), net sales ("NS"), cost of goods sold ("COGS"), selling, general, and administrative expenses ("SG&A expenses"), average unit values ("AUVs"), research and development expenses ("R&D expenses"), and return on assets ("ROA").

² ***. U.S. producer questionnaire responses, sections III-2 A.1. and III-2 B.4.

³ Staff verified the results of Dart Container with its corporate records and all adjustments were incorporated into this report. Dart Container's U.S. producer questionnaire response was revised as follows: ***. Staff verification report, Dart Container, January 24, 2025.

Figure VI-1
Paper plates: U.S. producers' share of net sales quantity in 2023, by firm

* * * * *

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

Note: ***.

Operations on paper plates

Table VI-1 presents aggregated data on U.S. producers' operations in relation to paper plates, while table VI-2 presents corresponding changes in AUVs. Table VI-3 presents selected company-specific financial data.

Table VI-1
Paper plates: U.S. producers' results of operations, by item and period

Quantity in 1,000 units; value in 1,000 dollars; ratios in percent

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Total net sales	Quantity	52,651,730	50,902,531	50,250,048	25,075,984	26,339,659
Total net sales	Value	2,253,556	2,664,113	2,881,423	1,426,010	1,447,594
COGS: Raw materials	Value	1,066,652	1,274,405	1,353,255	680,590	639,691
COGS: Direct labor	Value	179,765	195,779	180,651	94,167	103,908
COGS: Other factory	Value	505,804	591,526	742,812	367,633	348,298
COGS: Total	Value	1,752,221	2,061,710	2,276,718	1,142,390	1,091,897
Gross profit or (loss)	Value	501,335	602,403	604,705	283,620	355,697
SG&A expenses	Value	147,243	161,449	188,312	93,567	95,810
Operating income or (loss)	Value	354,092	440,954	416,393	190,053	259,887
Interest expense	Value	***	***	***	***	***
All other expenses	Value	***	***	***	***	***
All other income	Value	***	***	***	***	***
Net income or (loss)	Value	***	***	***	***	***
Depreciation/amortization	Value	***	***	***	***	***
Cash flow	Value	***	***	***	***	***
COGS: Raw materials	Ratio to NS	47.3	47.8	47.0	47.7	44.2
COGS: Direct labor	Ratio to NS	8.0	7.3	6.3	6.6	7.2
COGS: Other factory	Ratio to NS	22.4	22.2	25.8	25.8	24.1
COGS: Total	Ratio to NS	77.8	77.4	79.0	80.1	75.4
Gross profit	Ratio to NS	22.2	22.6	21.0	19.9	24.6
SG&A expense	Ratio to NS	6.5	6.1	6.5	6.6	6.6
Operating income or (loss)	Ratio to NS	15.7	16.6	14.5	13.3	18.0
Net income or (loss)	Ratio to NS	***	***	***	***	***

Table continued.

Table VI-1 Continued
Paper plates: U.S. producers' results of operations, by item and period

Shares in percent; unit values in dollars per 1,000 units; count in number of firms reporting

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
COGS: Raw materials	Share of COGS	60.9	61.8	59.4	59.6	58.6
COGS: Direct labor	Share of COGS	10.3	9.5	7.9	8.2	9.5
COGS: Other factory	Share of COGS	28.9	28.7	32.6	32.2	31.9
COGS: Total	Share of COGS	100.0	100.0	100.0	100.0	100.0
Total net sales	Unit value	42.80	52.34	57.34	56.87	54.96
COGS: Raw materials	Unit value	20.26	25.04	26.93	27.14	24.29
COGS: Direct labor	Unit value	3.41	3.85	3.60	3.76	3.94
COGS: Other factory	Unit value	9.61	11.62	14.78	14.66	13.22
COGS: Total	Unit value	33.28	40.50	45.31	45.56	41.45
Gross profit or (loss)	Unit value	9.52	11.83	12.03	11.31	13.50
SG&A expenses	Unit value	2.80	3.17	3.75	3.73	3.64
Operating income or (loss)	Unit value	6.73	8.66	8.29	7.58	9.87
Net income or (loss)	Unit value	***	***	***	***	***
Operating losses	Count	***	***	***	***	***
Net losses	Count	***	***	***	***	***
Data	Count	***	***	***	***	***

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

Table VI-2
Paper plates: Changes in AUVs between comparison periods

Changes in percent

Item	2021-23	2021-22	2022-23	Jan-Jun 2023-24
Total net sales	▲34.0	▲22.3	▲9.6	▼(3.4)
COGS: Raw materials	▲32.9	▲23.6	▲7.6	▼(10.5)
COGS: Direct labor	▲5.3	▲12.7	▼(6.5)	▲5.1
COGS: Other factory	▲53.9	▲21.0	▲27.2	▼(9.8)
COGS: Total	▲36.1	▲21.7	▲11.9	▼(9.0)

Table continued.

Table VI-2 Continued
Paper plates: Changes in AUVs between comparison periods

Changes in dollars per 1,000 units

Item	2021-23	2021-22	2022-23	Jan-Jun 2023-24
Total net sales	▲14.54	▲9.54	▲5.00	▼(1.91)
COGS: Raw materials	▲6.67	▲4.78	▲1.89	▼(2.85)
COGS: Direct labor	▲0.18	▲0.43	▼(0.25)	▲0.19
COGS: Other factory	▲5.18	▲2.01	▲3.16	▼(1.44)
COGS: Total	▲12.03	▲7.22	▲4.80	▼(4.10)
Gross profit or (loss)	▲2.51	▲2.31	▲0.20	▲2.19
SG&A expense	▲0.95	▲0.38	▲0.58	▼(0.09)
Operating income or (loss)	▲1.56	▲1.94	▼(0.38)	▲2.29
Net income or (loss)	▲***	▲***	▼***	▲***

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

Note: Percentages and unit values shown as “0.0” or “0.00” represent values greater than zero, but less than “0.05” or “0.005,” respectively. 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.

Table VI-3
Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales quantity

Quantity in 1,000 units

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Pactiv	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	52,651,730	50,902,531	50,250,048	25,075,984	26,339,659

Table continued.

Table VI-3 Continued
Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales value

Value in 1,000 dollars

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Pactiv	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	2,253,556	2,664,113	2,881,423	1,426,010	1,447,594

Table continued.

Table VI-3 Continued**Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period****COGS**

Value in 1,000 dollars

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Pactiv	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	1,752,221	2,061,710	2,276,718	1,142,390	1,091,897

Table continued.

Table VI-3 Continued**Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Gross profit or (loss)**

Value in 1,000 dollars

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Pactiv	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	501,335	602,403	604,705	283,620	355,697

Table continued.

Table VI-3 Continued**Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period****SG&A expenses**

Value in 1,000 dollars

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Pactiv	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	147,243	161,449	188,312	93,567	95,810

Table continued.

Table VI-3 Continued**Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Operating income or (loss)**

Value in 1,000 dollars

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Pactiv	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	354,092	440,954	416,393	190,053	259,887

Table continued.

Table VI-3 Continued**Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Net income or (loss)**

Value in 1,000 dollars

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Pactiv	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued**Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period****COGS to net sales ratio**

Ratios in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Pactiv	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	77.8	77.4	79.0	80.1	75.4

Table continued.

Table VI-3 Continued**Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Gross profit or (loss) to net sales ratio**

Ratios in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Pactiv	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	22.2	22.6	21.0	19.9	24.6

Table continued.

Table VI-3 Continued**Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period****SG&A expenses to net sales ratio**

Ratios in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Pactiv	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	6.5	6.1	6.5	6.6	6.6

Table continued.

Table VI-3 Continued**Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Operating income or (loss) to net sales ratio**

Ratios in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Pactiv	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	15.7	16.6	14.5	13.3	18.0

Table continued.

Table VI-3 Continued**Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Net income or (loss) to net sales ratio**

Ratios in percent

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Pactiv	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	***	***	***	***	***

Table continued.

Table VI-3 Continued**Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit net sales value**

Unit values in dollars per 1,000 units

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Pactiv	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	42.80	52.34	57.34	56.87	54.96

Table continued.

Table VI-3 Continued**Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit raw material costs**

Unit values in dollars per 1,000 units

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Pactiv	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	20.26	25.04	26.93	27.14	24.29

Table continued.

Table VI-3 Continued**Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit direct labor costs**

Unit values in dollars per 1,000 units

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Pactiv	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	3.41	3.85	3.60	3.76	3.94

Table continued.

Table VI-3 Continued**Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit other factory costs**

Unit values in dollars per 1,000 units

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Pactiv	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	9.61	11.62	14.78	14.66	13.22

Table continued.

Table VI-3 Continued**Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit COGS**

Unit values in dollars per 1,000 units

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Pactiv	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	33.28	40.50	45.31	45.56	41.45

Table continued.

Table VI-3 Continued**Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit gross profit or (loss)**

Unit values in dollars per 1,000 units

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Pactiv	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	9.52	11.83	12.03	11.31	13.50

Table continued.

Table VI-3 Continued**Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit SG&A expenses**

Unit values in dollars per 1,000 units

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Pactiv	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	2.80	3.17	3.75	3.73	3.64

Table continued.

Table VI-3 Continued**Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit operating income or (loss)**

Unit values in dollars per 1,000 units

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Pactiv	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	6.73	8.66	8.29	7.58	9.87

Table continued.

Table VI-3 Continued**Paper plates: U.S. producers' sales, costs/expenses, and profitability, by firm and period****Unit net income or (loss)**

Unit values in dollars per 1,000 units

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Pactiv	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	***	***	***	***	***

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

Note: As previously noted, ***.

Net sales

Net sales quantity decreased from 52.7 billion units in 2021 to 50.3 billion units in 2023 but was higher in interim 2024 (26.3 billion units) than in interim 2023 (25.1 billion units). The combined net sales value increased from \$2.3 billion in 2021 to \$2.9 billion in 2023 and was higher in interim 2024 (\$1.45 billion) than in interim 2023 (\$1.43 billion). As shown in table VI-3, six of the U.S. producers reported an overall decrease in their net sales quantity between 2021 and 2023, and six reported a net sales quantity in interim 2024 that was higher than in interim 2023.⁴ Seven of the U.S. producers reported an overall increase in net sales revenue between 2021 and 2023, and five reported higher net sales revenue in interim 2024 than in interim 2023.⁵

4 ***.

5 ***.

The industry's net sales AUV increased from \$42.80 per 1,000 units in 2021 to \$57.34 per 1,000 units in 2023 but was lower in interim 2024, at \$54.96 per 1,000 units, than in interim 2023, at \$56.87 per 1,000 units. All U.S. producers reported an overall increase in their net sales AUVs between 2021 and 2023, while three reported net sales AUVs in interim 2024 that were higher than in interim 2023.⁶

There was a relatively wide range of net sales AUVs among the U.S. producers, with *** having the lowest sales AUV in 2023, at \$*** per 1,000 units, and *** having the highest, at \$*** per 1,000 units. Some of the factors that affected the companies' net sales AUVs include paper plate size, whether they were branded or private label, and whether they were considered highly decorated specialty plates.

*** throughout the period examined, which were typically *** than those of the other U.S. producers.⁷ The majority of these *** producers' 2023 U.S. shipments were for private label brands and they reported *** shares of their 2023 U.S. shipments for each of the three size categories.⁸

Hoffmaster and Unique Industries produce paper plates that are considered highly-decorated party or occasion plates.⁹ Hoffmaster's net sales AUVs ***, while Unique Industries' sales AUVs were ***.¹⁰

⁶ While all U.S. producers reported an increase in their net sales AUVs between 2021 and 2023, the magnitude of the increase varied among the U.S. producers. For the industry overall, the net sales AUV increased by \$*** between 2021 and 2023, while ***. In response to a question about changes in operations, the company reported that it was ***. *** U.S. producer questionnaire, section II-2a.

⁷ ***.

⁸ U.S. producer questionnaires, sections II-9 and II-10.

⁹ Conference transcript, pp. 29-30 (White) and petitioners' postconference brief, Exh. 1, pp. A-15-16.

¹⁰ Hoffmaster and Unique Industries reported that *** and *** percent, respectively of their 2023 U.S. shipments, by quantity, were of *** products. However, while both companies are producers of highly-decorated party or occasion plates, the ***. The majority of ***. *** U.S. producer questionnaires, sections II-9 and II-10.

Lastly, ***.¹¹ At the staff conference, witnesses testified that Georgia-Pacific's Dixie branded paper plates received a 20 to 25 percent price premium over other paper plates.¹²

Cost of goods sold and gross profit or loss

Raw material costs comprised the largest portion of COGS in 2023, at 59.4 percent. Despite the decrease in net sales volume between 2021 and 2023, total raw material costs for the industry increased from \$1.1 billion in 2021 to \$1.4 billion in 2023. This reflects the increase in the raw material cost AUV over this period, which rose from \$20.26 per 1,000 units in 2021 to \$26.93 in 2023. Between the comparable interim periods the trend was the reverse. Despite a higher net sales volume, total raw material costs for the industry were lower in interim 2024 (\$639.7 million) than in interim 2023 (\$680.6 million), reflecting a lower raw material cost AUV in interim 2024 (\$24.29 per 1,000 units) than in interim 2023 (\$27.14 per 1,000 units).

On a company-specific basis the directional trends were mostly uniform amongst the U.S. producers. As shown in table VI-3, all firms experienced an increase in raw material cost AUVs between 2021 and 2023, and all but one company experienced raw material cost AUVs that were lower in interim 2024 than in interim 2023.¹³

¹¹ *** U.S. producer questionnaires, section II-9.

¹² Conference transcript, pp. 64-65 (Epstein) and pp. 78-79 (Cappell). ***. U.S. producer questionnaires, section II-10.

¹³ ***. ***. *** U.S. producer questionnaire, section II-2a.

Table VI-4 presents raw materials, by type.¹⁴ The table shows that paperboard is the primary raw material input for paper plates and accounted for *** percent of the total cost of raw materials in 2023. In addition to paperboard, *** U.S. producers reported using other raw material inputs which represented *** percent of the industry’s total raw material costs. These other raw material inputs were described as ***.¹⁵

Table VI-4
Paper plates: U.S. producers’ raw material costs in 2023

Value in 1,000 dollars; unit values in dollars per 1,000 units; share of value in percent

Item	Value	Unit value	Share of value
Paperboard	***	***	***
Other material inputs	***	***	***
Total, raw materials	1,353,255	26.93	100.0

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

Direct labor was the smallest component of COGS, accounting for 7.9 percent in 2023. The combined direct labor AUV fluctuated within a relatively narrow range when compared with the other components of COGS. It increased irregularly from \$3.41 per 1,000 units in 2021 to \$3.60 per 1,000 units in 2023 and was higher in the first half of 2024, at \$3.94 per 1,000 units, than in the first half of 2023, when it was \$3.75 per 1,000 units.¹⁶

¹⁴ ***. ***’s U.S. producers’ questionnaire response, sections III-6 and III-7a.

¹⁵ U.S. producer questionnaire responses, section III-9c.

¹⁶ ***. Email from ***.

The last component, other factory costs, accounted for 32.6 percent of total COGS in 2023. The combined other factory cost AUV increased from \$9.61 per 1,000 units in 2021 to \$14.78 per 1,000 units in 2023 but was lower in the first half of 2024 (\$13.22 per 1,000 units), than in the first half of 2023 (\$14.66 per 1,000 units). *** accounted for the largest company-specific increases between 2021 and 2023.^{17 18}

On an actual basis, total COGS increased from 2021 to 2023 but was lower in interim 2024 than in interim 2023. The industry's COGS AUV increased from \$33.28 per 1,000 units in 2021 to \$45.31 per 1,000 units in 2023 but was lower in interim 2024 (at \$41.45 per 1,000 units) than in interim 2023 (at \$45.56 per 1,000 units). The COGS to net sales ratio increased irregularly from 77.8 percent in 2021 to 79.0 percent in 2023, as COGS increased at a faster rate than the combined net sales value. The COGS to net sales ratio was lower in interim 2024 (at 75.4 percent) than in interim 2023 (at 80.1 percent) as total COGS decreased while the combined net sales value increased.

Between 2021 and 2023, net sales revenue increased more than COGS resulting in gross profit increasing from \$501.3 million in 2021 to \$604.7 million in 2023. Gross profit was also higher in interim 2024 (\$355.7 million) than it was in interim 2023 (\$283.6 million) as revenue increased slightly and total COGS decreased between the comparable interim periods.^{19 20}

17 ***. Email from ***.

18 ***. Email from ***.

19 ***.

20 ***.

SG&A expenses and operating income or loss

The industry's SG&A expenses increased between 2021 and 2023, from \$147.2 million to \$188.3 million, and were higher in interim 2024, at \$95.8 million, than they were in interim 2023, at \$93.6 million. The industry's SG&A expense ratio (the ratio of SG&A expenses to net sales value) decreased from 6.5 percent in 2021 to 6.1 percent in 2022 but returned to 6.5 percent in 2023. It was 6.6 percent in both interim periods.^{21 22}

The industry's operating income increased irregularly from \$354.1 million in 2021 to \$416.4 million in 2023 and was higher in January-June 2024, at \$259.9 million, than during the same period in 2023, when it was \$190.1 million. Six of the firms reported an improvement in operating income from 2021 to 2023 and six reported an improvement in operating income in interim 2024 relative to interim 2023.²³

²¹ ***. Email from ***. ***. Email from ***.

²² ***. Email from ***.

²³ ***.

All other expenses and net income or loss

Classified below the operating income level are interest expense, other expense, and other income, which are usually allocated to the product line from high levels in the corporation. Interest expense, which was the largest of these line items in each period examined, increased from \$*** in 2021 to \$*** in 2024 and was higher in interim 2024, at \$***, than in interim 2023, at \$***.²⁴ All other expenses increased irregularly from \$*** in 2021 to \$*** in 2023 but were lower in interim 2024 (\$***) than in interim 2023 (\$***).²⁵ All other income increased from \$*** in 2021 to \$*** in 2023 and was higher in interim 2024, at \$***, than in interim 2023, at \$***.

The industry's net income increased irregularly from \$*** in 2021 to \$*** in 2023 and was higher in interim 2024, at \$***, than in interim 2023, when it was \$***.^{26 27}

²⁴ ***. Email from ***.

²⁵ ***.

²⁶ ***.

²⁷ A variance analysis is not shown due to the large variation in the product mix and cost structures among the reporting firms.

Capital expenditures and research and development expenses

Table VI-5 presents capital expenditures, by firm, and table VI-7 presents R&D expenses, by firm. Tables VI-6 and VI-8 present the firms' narrative explanations of the nature, focus, and significance of their capital expenditures and R&D expenses, respectively.

The industry's capital expenditures increased from \$*** in 2021 to \$*** in 2023 but were lower in interim 2024 (\$***) than in interim 2023 (\$***). ***.²⁸

The industry's R&D expenses decreased between 2021 and 2023, from \$*** to \$*** but were higher in interim 2024 (\$***) than in interim 2023 (\$***). ***.

Table VI-5
Paper plates: U.S. producers' capital expenditures, by firm and period

Value in 1,000 dollars

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Pactiv	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	***	***	***	***	***

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

²⁸ As shown in table VI-6, ***, ***, ***'s U.S. producer questionnaire response, section II-2a.

Table VI-6**Paper plates: U.S. producers' narrative descriptions of their capital expenditures, by firm**

Firm	Narrative on capital expenditures
AJM Packaging	***
Aspen Products	***
Dart Container	***
Georgia-Pacific	***
Hoffmaster	***
Huhtamaki Americas	***
Pactiv	***
Unique Industries	***

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

Table VI-7**Paper plates: U.S. producers' R&D expenses, by firm and period**

Value in 1,000 dollars

Firm	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
AJM Packaging	***	***	***	***	***
Aspen Products	***	***	***	***	***
Dart Container	***	***	***	***	***
Georgia-Pacific	***	***	***	***	***
Hoffmaster	***	***	***	***	***
Huhtamaki Americas	***	***	***	***	***
Pactiv	***	***	***	***	***
Unique Industries	***	***	***	***	***
All firms	***	***	***	***	***

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

Table VI-8
Paper plates: U.S. producers' narrative descriptions of their R&D expenses, by firm

Firm	Narrative on R&D expenses
AJM Packaging	***
Aspen Products	***
Dart Container	***
Georgia-Pacific	***
Hoffmaster	***
Huhtamaki Americas	***
Pactiv	***
Unique Industries	***

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

Assets and return on assets

Table VI-9 presents data on the U.S. producers' total assets for paper plates while table VI-10 presents their operating ROA.²⁹ Table VI-11 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time. Total assets increased from \$*** in 2021 to \$*** in 2023. ***. The industry's ROA increased irregularly from *** percent in 2021 to *** percent in 2023.

²⁹ The operating ROA is calculated as operating income divided by total assets. With respect to a firm's overall operations, the total asset value reflects an aggregation of a number of assets which are generally not product specific. Thus, high-level allocations are generally required in order to report a total asset value on a product-specific basis.

Table VI-9
Paper plates: U.S. producers' total net assets, by firm and period

Value in 1,000 dollars

Firm	2021	2022	2023
AJM Packaging	***	***	***
Aspen Products	***	***	***
Dart Container	***	***	***
Georgia-Pacific	***	***	***
Hoffmaster	***	***	***
Huhtamaki Americas	***	***	***
Pactiv	***	***	***
Unique Industries	***	***	***
All firms	***	***	***

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

Table VI-10
Paper plates: U.S. producers' ROA, by firm and period

Ratio in percent

Firm	2021	2022	2023
AJM Packaging	***	***	***
Aspen Products	***	***	***
Dart Container	***	***	***
Georgia-Pacific	***	***	***
Hoffmaster	***	***	***
Huhtamaki Americas	***	***	***
Pactiv	***	***	***
Unique Industries	***	***	***
All firms	***	***	***

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

Table VI-11

Paper plates: U.S. producers' narrative descriptions of their total net assets, by firm

Firm	Narrative on assets
AJM Packaging	***
Aspen Products	***
Dart Container	***
Georgia-Pacific	***
Hoffmaster	***
Huhtamaki Americas	***
Pactiv	***
Unique Industries	***

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

Capital and investment

The Commission requested U.S. producers of paper plates to describe any actual or potential negative effects of imports of paper plates from China, Thailand, and/or Vietnam on their firms' growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table VI-12 presents the number of firms reporting an impact in each category and table VI-13 provides the U.S. producers' narrative responses.

Table VI-12

Paper plates: Count of firms indicating actual and anticipated negative effects of imports from subject sources on investment, growth, and development since January 1, 2021, by effect

Number of firms reporting

Effect	Category	Count
Cancellation, postponement, or rejection of expansion projects	Investment	***
Denial or rejection of investment proposal	Investment	***
Reduction in the size of capital investments	Investment	***
Return on specific investments negatively impacted	Investment	***
Other investment effects	Investment	***
Any negative effects on investment	Investment	***
Rejection of bank loans	Growth	***
Lowering of credit rating	Growth	***
Problem related to the issue of stocks or bonds	Growth	***
Ability to service debt	Growth	***
Other growth and development effects	Growth	***
Any negative effects on growth and development	Growth	***
Anticipated negative effects of imports	Future	***

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

Table VI-13

Paper plates: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2021, by firm and effect

Item	Firm name and narrative on impact of imports
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued.

Table VI-13 Continued

Paper plates: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2021, by firm and effect

Item	Firm name and narrative on impact of imports
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

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

Part VII: Threat considerations and information on nonsubject countries

Section 771(7)(F)(i) of the Act (19 U.S.C. § 1677(7)(F)(i)) provides that—

In determining whether an industry in the United States is threatened with material injury by reason of imports (or sales for importation) of the subject merchandise, the Commission shall consider, among other relevant economic factors¹--

- (I) if a countervailable subsidy is involved, such information as may be presented to it by the administering authority as to the nature of the subsidy (particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement), and whether imports of the subject merchandise are likely to increase,*
- (II) any existing unused production capacity or imminent, substantial increase in production capacity in the exporting country indicating the likelihood of substantially increased imports of the subject merchandise into the United States, taking into account the availability of other export markets to absorb any additional exports,*
- (III) a significant rate of increase of the volume or market penetration of imports of the subject merchandise indicating the likelihood of substantially increased imports,*
- (IV) whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices, and are likely to increase demand for further imports,*
- (V) inventories of the subject merchandise,*

¹ Section 771(7)(F)(ii) of the Act (19 U.S.C. § 1677(7)(F)(ii)) provides that “The Commission shall consider {these factors} . . . as a whole in making a determination of whether further dumped or subsidized imports are imminent and whether material injury by reason of imports would occur unless an order is issued or a suspension agreement is accepted under this title. The presence or absence of any factor which the Commission is required to consider . . . shall not necessarily give decisive guidance with respect to the determination. Such a determination may not be made on the basis of mere conjecture or supposition.”

- (VI) *the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products,*
- (VII) *in any investigation under this title which involves imports of both a raw agricultural product (within the meaning of paragraph (4)(E)(iv)) and any product processed from such raw agricultural product, the likelihood that there will be increased imports, by reason of product shifting, if there is an affirmative determination by the Commission under section 705(b)(1) or 735(b)(1) with respect to either the raw agricultural product or the processed agricultural product (but not both),*
- (VIII) *the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and*
- (IX) *any other demonstrable adverse trends that indicate the probability that there is likely to be material injury by reason of imports (or sale for importation) of the subject merchandise (whether or not it is actually being imported at the time).²*

Information on the nature of the subsidies was presented earlier in this report; information on the volume and pricing of imports of the subject merchandise is presented in Parts IV and V; and information on the effects of imports of the subject merchandise on U.S. producers' existing development and production efforts is presented in Part VI. Information on inventories of the subject merchandise; foreign producers' operations, including the potential for "product-shifting;" any other threat indicators, if applicable; and any dumping in third-country markets, follows. Also presented in this section of the report is information obtained for consideration by the Commission on nonsubject countries.

² Section 771(7)(F)(iii) of the Act (19 U.S.C. § 1677(7)(F)(iii)) further provides that, in antidumping investigations, ". . . the Commission shall consider whether dumping in the markets of foreign countries (as evidenced by dumping findings or antidumping remedies in other WTO member markets against the same class or kind of merchandise manufactured or exported by the same party as under investigation) suggests a threat of material injury to the domestic industry."

Subject countries

The Commission issued foreign producers' or exporters' questionnaires to 150 firms believed to produce and/or export paper plates from China, Thailand, and Vietnam.³ Usable responses to the Commission's questionnaire were received from four firms in total.⁴

Table VII-1 presents the number of producers/exporters in each subject country that responded to the Commission's questionnaire, their exports to the United States as a share of U.S. imports by each subject country in 2023, and their estimated share of total production of paper plates in each subject country during 2023.

Table VII-1
Paper plates: Number of responding producers/exporters, approximate share of production, and exports to the United States as a share of U.S. imports, by subject foreign industry, 2023

Country	Number of reporting firms	Approximate share of production (percent)	Exports as a share of U.S. imports from subject country (percent)
China	***	***	***
Thailand	***	***	***
Vietnam	***	***	***

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

Note: "Approximate share of production" reflects the responding firms' estimates of their production as a share of total country production of mattresses in 2023. Since not all firms have perfect knowledge of the industry in their home market, different firms might use different denominators in estimating their firm's share of the total requested. For countries in which more than one firm responded, the average denominator for reasonably reported estimates is used in the share presented. Approximate shares are rounded to the nearest whole number.

Note: "Exports as a share of U.S. imports" reflects a comparison of export data reported by firms in response to the Commission's foreign producer/exporter questionnaire with official Commerce import statistics using HTS statistical reporting number 4823.69.0040, accessed September 10, 2024, adjusted to remove merchandise certified as out-of-scope in response to Commission questionnaires using proprietary, Census-edited Customs import records.

³ These firms were identified through a review of information submitted in the petition and presented in third-party sources.

⁴ One of the four respondents, ***, does not produce paper plates but is a reseller that exports paper plates to the United States from ***. One firm submitted a certified response that they have not produced or exported paper plates since January 1, 2021.

Table VII-2 presents information on the paper plates operations of the responding producers and exporters in China, Thailand, and Vietnam (or the responding subject producers/exporters, by firm) and table VII-3 presents summary information on responding resellers of subject paper plates.⁵

Table VII-2
Paper plates: Summary data on responding subject foreign producers in 2023, by firm

Subject foreign industry: Producer	Production (1,000 units)	Share of reported production (percent)	Exports to the United States (1,000 units)	Share of reported exports to the United States (percent)	Total shipments (1,000 units)	Share of firm's total shipments exported to the United States (percent)
China: Dong Hui	***	***	***	***	***	***
Thailand: Thai Paper	***	***	***	***	***	***
Vietnam: Go-Pak	***	***	***	***	***	***
All individual producers	***	100.0	***	100.0	***	***

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

Table VII-3
Paper plates: Summary data for subject resellers in 2023

Subject foreign industry: Reseller	Resales exported to the United States (1,000 units)	Share of resales exported to the United States (percent)
China: ***	***	***
All individual resellers	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

No significant industry events were found in the subject countries since January 1, 2021.

⁵ *** exports to the United States as a reseller in 2023.

Changes in operations

Subject producers were asked to report any change in the character of their operations or organization relating to the production of paper plates since 2021. Two of three producers indicated in their questionnaires that they had experienced such changes. Tables VII-5 and VII-6 presents the changes identified by these producers.

Table VII-5
Paper plates: Count of reported changes in operations since January 1, 2021, by change and subject foreign industry

Count in number of firms reporting

Type of change in operation	China	Thailand	Vietnam	Subject foreign industries
Plant openings	***	***	***	***
Plant closings	***	***	***	***
Prolonged shutdowns	***	***	***	***
Production curtailments	***	***	***	***
Relocations	***	***	***	***
Expansions	***	***	***	***
Acquisitions	***	***	***	***
Consolidations	***	***	***	***
Weather-related or force majeure events	***	***	***	***
Other	***	***	***	***
Any change	***	***	***	***

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

Table VII-6
Paper plates: Reported changes in operations in the subject countries since January 1, 2021, by change, subject industry, and firm

Item	Subject foreign industry, firm and accompanying narrative response regarding changes in operations
Relocations	***
Expansions	***
Weather-related or force majeure events	***

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

Responding subject producers did not report any anticipated changes in operations relating to the production of paper plates in the future.

Installed and practical overall capacity

Table VII-7 presents data on subject producers’ installed capacity, practical overall capacity, and practical paper plates capacity and production on the same equipment. During 2021-23, installed overall, practical overall, and practical paper plates capacity increased by *** percent, *** percent, and *** percent, respectively, and were higher in interim 2024 compared to interim 2023. Following a similar trend, reported practical overall and practical paper plates production both increased by close to *** percent during 2021-23 and were higher in interim 2024 compared to interim 2023.⁶ Installed overall, practical overall, and practical paper plates capacity utilization all increased from 2021 to 2022 before decreasing in 2023 and were higher in interim 2024 than in interim 2023.

Table VII-7
Paper plates: Subject producers’ installed and practical capacity and production on the same equipment as in-scope production, by period

Capacity and utilization in 1,000 units; utilization in percent

Item	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical paper plates	Capacity	***	***	***	***	***
Practical paper plates	Production	***	***	***	***	***
Practical paper plates	Utilization	***	***	***	***	***

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

Constraints on capacity

Tables VII-8 and VII-9 present subject producers’ reported production and capacity constraints since January 1, 2021. The most commonly reported capacity constraints were “production bottlenecks” and “storage capacity” (reported by two firms each).

⁶ The increase in capacity and production was reported by ***.

Table VII-8
Paper plates: Production constraints by subject foreign industry

Count in number of firms reporting

Item	China	Thailand	Vietnam	Subject sources
Production bottlenecks	***	***	***	***
Existing labor force	***	***	***	***
Supply of material inputs	***	***	***	***
Fuel or energy	***	***	***	***
Storage capacity	***	***	***	***
Logistics/transportation	***	***	***	***
Other constraints	***	***	***	***

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

Table VII-9
Paper plates: Subject producers' reported constraints to practical overall capacity since January 1, 2021, by constraint and firm

Item	Subject foreign industry, firm and narrative response on constraints to practical overall capacity
Production bottlenecks	***
Production bottlenecks	***
Existing labor force	***
Storage capacity	***
Storage capacity	***
Logistics/transportation	***
Other constraints	***

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

Operations on paper plates

Aggregate paper plates operations in the subject foreign industries

Table VII-10 presents information on the paper plates operations of the responding producers/exporters (aggregate data for all subject foreign industries). Between 2021 and 2023, subject producers' combined capacity and production of paper plates increased by *** percent and *** percent, respectively.⁷ Although reported capacity is projected to level off in 2024 and 2025, paper plate production is projected to increase by *** percent in 2024 and a further *** percent in 2025. Capacity utilization increased from *** percent in 2021 to *** percent in 2022 before decreasing to *** percent in 2023 and was higher in interim 2024 than in interim 2023, and is projected to increase in 2024 and 2025.

Subject producers' exports to the United States, which increased by *** percent during 2021-23, accounted for *** percent of subject producers' total shipments in 2021, *** percent in 2022 and *** percent in 2023, and are projected to continue to account for *** of total shipments in 2024 and 2025.

Table VII-10
Paper Plates: Data on subject foreign industries, by item and period

Quantity in 1,000 units

Item	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024	Projection 2024	Projection 2025
Capacity	***	***	***	***	***	***	***
Production	***	***	***	***	***	***	***
End-of-period inventories	***	***	***	***	***	***	***
Internal consumption	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Home market shipments	***	***	***	***	***	***	***
Exports to the United States	***	***	***	***	***	***	***
Exports to all other markets	***	***	***	***	***	***	***
Export shipments	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***
Resales exported to the United States	***	***	***	***	***	***	***
Total exports to the United States	***	***	***	***	***	***	***

Table continued.

⁷ Though each responding foreign producer reported increases in paper plate capacity and production, *** was the foreign producer responsible for the substantial majority of the increases.

Table VII-10 Continued
Paper Plates: Data on subject foreign industries, by item and period

Ratio and share in percent

Item	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024	Projection 2024	Projection 2025
Capacity utilization ratio	***	***	***	***	***	***	***
Inventory ratio to production	***	***	***	***	***	***	***
Inventory ratio to total shipments	***	***	***	***	***	***	***
Internal consumption share	***	***	***	***	***	***	***
Commercial home market shipments share	***	***	***	***	***	***	***
Home market shipments share	***	***	***	***	***	***	***
Exports to the United States share	***	***	***	***	***	***	***
Exports to all other markets share	***	***	***	***	***	***	***
Export shipments share	***	***	***	***	***	***	***
Total shipments share	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Resales exported to the United States	***	***	***	***	***	***	***
Total exports to the United States	***	***	***	***	***	***	***

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

Practical paper plates capacity and production

Table III-11 presents information on subject producers' production, capacity, and capacity utilization by subject country. During 2021-23, responding Chinese producers' paper plates capacity and production both increased, by *** percent and *** percent, respectively, and were higher in interim 2024 than in interim 2023. While capacity was projected to remain close to 2023 levels in 2024 and 2025, production was projected to be similar in 2024 compared to 2023 before decreasing by *** percent in 2025. Capacity utilization increased from *** percent in 2021 to *** percent in 2023 and was *** percent in interim 2024 compared to *** percent in interim 2023.

During 2021-23, responding Thai producers' paper plates capacity and production both increased, by *** percent and *** percent, respectively, and were higher in interim 2024 than in interim 2023. While capacity was projected to decrease by *** percent in 2024 and 2025 compared to the 2023 level, production was projected to increase by *** percent in 2024 and *** percent in 2025. Capacity utilization increased irregularly from *** percent in 2021 to *** percent in 2023 and was *** percent in interim 2024 compared to *** percent in interim 2023.

Responding Vietnamese producers' paper plates capacity and production both increased by *** percent and *** percent, respectively, during 2021-23, and while capacity was the same, production was higher in interim 2024 than in interim 2023. While

capacity was projected to remain steady to 2023 levels in 2024 and 2025, production was projected to decrease by *** percent in 2024 before increasing by *** percent in 2025. Capacity utilization increased from *** percent in 2021 to *** percent in 2023 and was *** percent in interim 2024 compared to *** percent in interim 2023.

Table VII-11
Paper plates: Subject producers' output: Practical capacity, by source and period

Practical capacity

Capacity in 1,000 units

Subject foreign industry	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024	Projection 2024	Projection 2025
China	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Table continued.

Table VII-11 Continued
Paper plates: Subject producers' output: Production, by source and period

Production

Production in 1,000 units

Subject foreign industry	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024	Projection 2024	Projection 2025
China	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Table continued.

Table VII-11 Continued
Paper plates: Subject producers' output: Capacity utilization, by source and period

Capacity utilization

Capacity utilization in percent

Subject foreign industry	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024	Projection 2024	Projection 2025
China	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Table continued.

Note: Capacity utilization ratio represents the ratio of the subject producer's production to its production capacity.

Table VII-11 Continued

Paper plates: Subject producers' output: Share of production, by source and period

Share of production

Share in percent

Subject foreign industry	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024	Projection 2024	Projection 2025
China	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All subject foreign industries	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

Paper plates exports, by subject country

Table VII-12 presents information on subject producers' (and resellers) exports of paper plates by subject country. Chinese and Vietnamese subject producers' exports to the United States increased by *** percent and *** percent, respectively, while Thai producers' exports to the United States increase by *** percent from 2022 to 2023 ***. The share of exports to the United States to total shipments increased from *** percent in 2021 to *** percent for Chinese exporters, and they accounted for *** of total shipments of Thai exporters and *** for Vietnamese exporters.

Table VII-12

Paper plates: Subject producers' (and resellers') exports: Exports to the United States, by source and period

Exports to the United States

Quantity in 1,000 units

Subject foreign industry	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024	Projection 2024	Projection 2025
China	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

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

Table VII-12 Continued

Paper plates: Subject producers' (and resellers') exports to the United States: Share of total shipments, by source and period

Share of total shipments exported to the United States

Share in percent

Subject foreign industry	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024	Projection 2024	Projection 2025
China	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

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

Table VII-12 Continued

Paper plates: Subject producers' (and resellers') exports: Exports to all destination markets, by source and period

Total exports

Quantity in 1,000 units

Subject foreign industry	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024	Projection 2024	Projection 2025
China	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

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

Table VII-12 Continued

Paper plates: Subject producers' (and resellers') exports: Share of total shipments exported to all destination markets, by source and period

Share of total shipments exported

Share in percent

Subject foreign industry	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024	Projection 2024	Projection 2025
China	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

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

Paper Plates inventories, by subject foreign industry

Table VII-13 presents information on subject producers' (and resellers) inventories of paper plates by subject country. Subject producers' (and resellers) inventories of paper plates increased by *** percent from 2021 to 2022 before decreasing by *** percent in 2023 and were *** percent higher in interim 2024 compared to interim 2023. Inventories in China and Vietnam *** irregularly between 2021 and 2023 while inventories in Thailand *** irregularly during the same period and were projected to be *** in 2024 and 2025.

Subject producers' (and resellers) ratios of inventories to total shipments exported decreased from *** percent in 2021 to *** percent in 2023, was *** percent in interim 2024 compared to *** percent in interim 2023, and was projected to be *** percent in 2024 and *** percent in 2025.

Table VII-13

Paper plates: Subject foreign industries' ending inventories, by subject foreign industry and period

Quantity in 1,000 units

Subject foreign industry	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024	Projection 2024	Projection 2025
China	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

Table continued.

Table VII-13--Continued

Paper plates: Subject foreign industries' ratios of inventories to total shipments exported, by subject foreign industry and period

Shares in percent

Subject foreign industry	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024	Projection 2024	Projection 2025
China	***	***	***	***	***	***	***
Thailand	***	***	***	***	***	***	***
Vietnam	***	***	***	***	***	***	***
All subject foreign industries	***	***	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Alternative products

As shown in table VII-14, responding foreign producers in subject countries produced other products on the same equipment and machinery used to produce paper plates. Paper plates accounted for between *** percent and *** percent of overall production across all periods for which the Commission collected information. Other reported produced on the same equipment as paper plates included ***.

Table VII-14
Paper plates: Subject producers' overall production on the same equipment as in-scope production, by product type and period

Quantity in 1,000 units; share in percent

Product type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Paper plates	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
All products	Quantity	***	***	***	***	***
Paper plates	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
All products	Share	100.0	100.0	100.0	100.0	100.0

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

Exports

Table VII-15 presents Global Trade Atlas (“GTA”) data for exports, by value, of paper or paperboard trays, dishes, plates, cups, and the like from subject countries to the United States and to all destination markets. Such exports from all three subject sources to the United States and to all destination markets increased from 2021 to 2023.⁸ During this period, the share of such exports from subject countries exported to the United States increased irregularly from 26.7 percent to 29.2 percent. In terms of value, exports from each subject country to the United States were higher in 2023 than in 2021. Exports from subject countries to the United States collectively decreased from 2022 to 2023, which was entirely attributable to a decrease in China’s exports. Exports from China to the United States increased from 2021-2022 but decreased from 2022-2023, though the value and share of China’s 2023 exports remained higher than 2021 exports. The largest relative increase during 2021-23 was Thailand, whose exports of paper and paperboard products to all destination markets nearly tripled in value. The share of Thailand’s exports to the United States during that period increased by over 500 percent.

⁸ Exports from China increased from 2021 to 2022 before decreasing in 2023.

Table VII-15**Paper or paperboard trays, dishes, plates, cups, and the like: Global exports from subject exporters: Exports to the United States, by exporter and period**

Value in 1,000 dollars

Exporter	Measure	2021	2022	2023
China	Value	420,700	697,887	593,515
Thailand	Value	477	7,431	9,085
Vietnam	Value	10,966	20,022	27,170
Subject exporters	Value	432,142	725,339	629,769

Table continued.

Table VII-15**Paper or paperboard trays, dishes, plates, cups, and the like: Global exports from subject exporters: Exports to all destination markets, by exporter and period**

Value in 1,000 dollars

Exporter	Measure	2021	2022	2023
China	Value	1,573,510	2,242,585	2,069,222
Thailand	Value	5,098	13,439	15,147
Vietnam	Value	42,488	56,996	71,435
Subject exporters	Value	1,621,096	2,313,020	2,155,803

Table continued.

Table VII-15 Continued**Paper or paperboard trays, dishes, plates, cups, and the like: Global exports from subject exporters: Share of exports exported to the United States, by exporter and period**

Share in percent

Exporter	Measure	2021	2022	2023
China	Share	26.7	31.1	28.7
Thailand	Share	9.4	55.3	60.0
Vietnam	Share	25.8	35.1	38.0
Subject exporters	Share	26.7	31.4	29.2

Source: Official exports statistics and official global imports statistics from Vietnam (constructed exports) under HS subheadings 4823.69 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed September 10, 2024.

Note: Shares represent the shares of value exported to the United States out of all destination markets.

U.S. inventories of imported merchandise

Table VII-16 presents information on subject producers' (and resellers) inventories of paper plates by subject country. U.S. importers' inventories of imports from subject sources increased by *** percent during 2021-23 and were *** percent higher in interim 2024 compared to interim 2023. *** accounted for a substantial majority of these inventories during 2021-23. U.S. importers' inventories of imports from each subject source (China, Thailand and Vietnam) increased from 2021 to 2023 and were higher in the interim 2024 than in interim 2023.⁹ U.S. importers' inventories of imports from nonsubject sources also increased, by *** percent during 2021-23, but were lower in interim 2024 compared to interim 2023.

⁹ There were *** in 2021.

Table VII-16

Paper plates: Subject foreign industries' ending inventories: Ending inventories, by subject foreign industry and period

Quantity in 1,000 units; ratios in percent

Measure	Source	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Inventories quantity	China	***	***	***	***	***
Ratio to imports	China	***	***	***	***	***
Ratio to U.S. shipments of imports	China	***	***	***	***	***
Ratio to total Shipments of imports	China	***	***	***	***	***
Inventories quantity	Thailand	***	***	***	***	***
Ratio to imports	Thailand	***	***	***	***	***
Ratio to U.S. shipments of imports	Thailand	***	***	***	***	***
Ratio to total Shipments of imports	Thailand	***	***	***	***	***
Inventories quantity	Vietnam	***	***	***	***	***
Ratio to imports	Vietnam	***	***	***	***	***
Ratio to U.S. shipments of imports	Vietnam	***	***	***	***	***
Ratio to total Shipments of imports	Vietnam	***	***	***	***	***
Inventories quantity	Subject sources	***	***	***	***	***
Ratio to imports	Subject sources	***	***	***	***	***
Ratio to U.S. shipments of imports	Subject sources	***	***	***	***	***
Ratio to total Shipments of imports	Subject sources	***	***	***	***	***
Inventories quantity	Nonsubject sources	***	***	***	***	***
Ratio to imports	Nonsubject sources	***	***	***	***	***
Ratio to U.S. shipments of imports	Nonsubject sources	***	***	***	***	***
Ratio to total Shipments of imports	Nonsubject sources	***	***	***	***	***
Inventories quantity	All	***	***	***	***	***
Ratio to imports	All	***	***	***	***	***
Ratio to U.S. shipments of imports	All	***	***	***	***	***
Ratio to total Shipments of imports	All	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "--".

U.S. importers’ outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of paper plates from China, Thailand and Vietnam after June 30, 2024. Their reported data are presented in table VII-17. The leading individual source of U.S. importers’ total arranged subject imports was Thailand, which accounted for *** of arranged subject imports of paper plates, followed by China and Vietnam. Arranged imports of paper plates from nonsubject source accounted for *** percent of all reported arranged imports of paper plates after June 30, 2024.¹⁰

Table VII-17
Paper plates: U.S. importers’ arranged imports, by source and period

Quantity in 1,000 units

Source	Jul-Sep 2024	Oct-Dec 2024	Jan-Mar 2025	Apr-Jun 2025	Total
China	***	***	***	***	***
Thailand	***	***	***	***	***
Vietnam	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

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

Third-country trade actions

Based on available information, paper plates from China, Thailand, and Vietnam have not been subject to any other import relief proceedings outside the United States.¹¹

Information on nonsubject countries

Table VII-18 presents global export data for paper or paperboard trays, dishes, plates, cups, and the like, a category that includes paper plates and out-of-scope products. The largest global exporter was China, representing 49.8 percent of global exports by value in 2023, with exports of \$2.1 billion. The next five leading exporters by value in 2023 were Italy, the United States, Germany, Poland, and Taiwan.

¹⁰ *** accounted for the substantial majority of arranged imports from nonsubject sources.

¹¹ World Trade Organization (“WTO”), “Database of anti-dumping investigations,” <https://trade-remedies.wto.org/en/antidumping/investigations>, retrieved December 5, 2024; and WTO, “Database of countervailing duty investigations,” <https://trade-remedies.wto.org/en/countervailing/investigations>, retrieved December 5, 2024.

Table VII-18**Paper or paperboard trays, dishes, plates, cups, and the like: Global exports, by reporting country and period**

Value in 1,000 dollars: Shares in percent

Exporting country	Measure	2021	2022	2023
United States	Value	211,632	268,758	282,867
China	Value	1,573,510	2,242,585	2,069,222
Thailand	Value	5,098	13,439	15,147
Vietnam	Value	42,488	56,996	71,435
Subject exporters	Value	1,621,096	2,313,020	2,155,803
Italy	Value	286,421	317,005	310,772
Germany	Value	112,734	143,492	144,169
Poland	Value	75,665	105,996	109,555
Taiwan	Value	105,463	125,179	107,468
Turkey	Value	105,009	131,755	99,763
Netherlands	Value	68,532	95,226	98,363
Spain	Value	79,566	105,342	85,913
Mexico	Value	15,232	49,556	53,249
Canada	Value	43,656	55,596	52,557
Finland	Value	39,234	54,809	52,545
Nonsubject exporters	Value	931,513	1,183,957	1,114,354
All other exporters	Value	571,244	671,830	598,548
All reporting exporters	Value	3,335,486	4,437,564	4,151,572
United States	Share of value	6.3	6.1	6.8
China	Share of value	47.2	50.5	49.8
Thailand	Share of value	0.2	0.3	0.4
Vietnam	Share of value	1.3	1.3	1.7
Subject exporters	Share of value	48.6	52.1	51.9
Italy	Share of value	8.6	7.1	7.5
Germany	Share of value	3.4	3.2	3.5
Poland	Share of value	2.3	2.4	2.6
Taiwan	Share of value	3.2	2.8	2.6
Turkey	Share of value	3.1	3.0	2.4
Netherlands	Share of value	2.1	2.1	2.4
Spain	Share of value	2.4	2.4	2.1
Mexico	Share of value	0.5	1.1	1.3
Canada	Share of value	1.3	1.3	1.3
Finland	Share of value	1.2	1.2	1.3
Nonsubject exporters	Share of value	27.9	26.7	26.8
All other exporters	Share of value	17.1	15.1	14.4
All reporting exporters	Share of value	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 4823.69 as reported by various national statistical authorities in the Global Trade Atlas Suite database, accessed September 10, 2024.

Note: United States is shown at the top followed by the countries under investigation, all remaining top exporting countries in descending order of 2023 data.

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 6130, January 31, 2024	<i>Paper Plates From China, Thailand, and Vietnam; Institution of Antidumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2024-01-31/pdf/2024-01881.pdf
89 FR 13043, February 21, 2024	<i>Certain Paper Plates From the People's Republic of China and the Socialist Republic of Vietnam: Initiation of Countervailing Duty Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2024-02-21/pdf/2024-03527.pdf
89 FR 14046, February 26, 2024	<i>Certain Paper Plates From the People's Republic of China, Thailand, and the Socialist Republic of Vietnam: Initiation of Less-Than-Fair-Value Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2024-02-26/pdf/2024-03863.pdf
89 FR 18970, March 15, 2024	<i>Paper Plates From China, Thailand, and Vietnam; Determinations</i>	https://www.govinfo.gov/content/pkg/FR-2024-03-15/pdf/2024-05470.pdf
89 FR 49833, June 12, 2024	<i>Certain Paper Plates From the People's Republic of China, Thailand, and the Socialist Republic of Vietnam: Postponement of Preliminary Determinations in the Less-Than-Fair-Value Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2024-06-12/pdf/2024-12832.pdf
89 FR 54432, July 1, 2024	<i>Certain Paper Plates From the People's Republic of China: Preliminary Affirmative Countervailing Duty Determination, Preliminary Affirmative Determination of Critical Circumstances, in Part, and Alignment of Final Determination With Final Antidumping Duty Determination</i>	https://www.govinfo.gov/content/pkg/FR-2024-07-01/pdf/2024-14405.pdf

Citation	Title	Link
89 FR 54429, July 1, 2024	<i>Certain Paper Plates From the Socialist Republic of Vietnam: Preliminary Affirmative Countervailing Duty Determination, Preliminary Affirmative Determination of Critical Circumstances, in Part, and Alignment of Final Determination With Antidumping Duty Determination</i>	https://www.govinfo.gov/content/pkg/FR-2024-07-01/pdf/2024-14406.pdf
89 FR 72367, September 5, 2024	<i>Certain Paper Plates From the People's Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Affirmative Determination of Critical Circumstances, in Part, Postponement of Final Determination, and Extension of Provisional Measures</i>	https://www.govinfo.gov/content/pkg/FR-2024-09-05/pdf/2024-19975.pdf
89 FR 72375, September 5, 2024	<i>Certain Paper Plates From the Socialist Republic of Vietnam: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Affirmative Determination of Critical Circumstances, in Part, Postponement of Final Determination, and Extension of Provisional Measures</i>	https://www.govinfo.gov/content/pkg/FR-2024-09-05/pdf/2024-19964.pdf
89 FR 72370, September 5, 2024	<i>Certain Paper Plates From Thailand: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Affirmative Determination of Critical Circumstances, in Part, and Postponement of Final Determination and Extension of Provisional Measures</i>	https://www.govinfo.gov/content/pkg/FR-2024-09-05/pdf/2024-19972.pdf

Citation	Title	Link
89 FR 76508, September 18, 2024	<i>Paper Plates From China, Thailand, and Vietnam; Scheduling of the Final Phase of Countervailing Duty and Antidumping Duty Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2024-09-18/pdf/2024-21146.pdf
90 FR 8142, January 24, 2025	<i>Paper Plates From China, Thailand, and Vietnam; Cancellation of Hearing for Final Phase Antidumping and Countervailing Duty Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2025-01-24/pdf/2025-01646.pdf
90 FR 8281, January 28, 2025	<i>Certain Paper Plates From the People's Republic of China: Final Affirmative Countervailing Duty Determination and Final Affirmative Determination of Critical Circumstances, in Part</i>	https://www.govinfo.gov/content/pkg/FR-2025-01-28/pdf/2025-01808.pdf
90 FR 8258, January 28, 2025	<i>Certain Paper Plates From the Socialist Republic of Vietnam: Final Affirmative Countervailing Duty Determination and Final Affirmative Determination of Critical Circumstances, in Part</i>	https://www.govinfo.gov/content/pkg/FR-2025-01-28/pdf/2025-01810.pdf
90 FR 8271, January 28, 2025	<i>Certain Paper Plates From the People's Republic of China: Final Affirmative Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part</i>	https://www.govinfo.gov/content/pkg/FR-2025-01-28/pdf/2025-01807.pdf
90 FR 8262, January 28, 2025	<i>Certain Paper Plates From Thailand: Final Affirmative Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part</i>	https://www.govinfo.gov/content/pkg/FR-2025-01-28/pdf/2025-01809.pdf
90 FR 8265, January 28, 2025	<i>Certain Paper Plates From the Socialist Republic of Vietnam: Final Affirmative Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part</i>	https://www.govinfo.gov/content/pkg/FR-2025-01-28/pdf/2025-01806.pdf

APPENDIX B

NOTICE OF CANCELTION OF HEARING

reviews and that have provided individually adequate responses to the notice of institution,² and any party other than an interested party to the reviews may file written comments with the Secretary on what determinations the Commission should reach in the reviews. Comments are due on or before 5:15 p.m. on March 13, 2025, and may not contain new factual information. Any person that is neither a party to the five-year reviews nor an interested party may submit a brief written statement (which shall not contain any new factual information) pertinent to the reviews by March 13, 2025. However, should the Department of Commerce (“Commerce”) extend the time limit for its completion of the final results of its reviews, the deadline for comments (which may not contain new factual information) on Commerce’s final results is three business days after the issuance of Commerce’s results. If comments contain business proprietary information (BPI), they must conform with the requirements of §§ 201.6, 207.3, and 207.7 of the Commission’s rules. The Commission’s *Handbook on Filing Procedures*, available on the Commission’s website at https://www.usitc.gov/documents/handbook_on_filing_procedures.pdf, elaborates upon the Commission’s procedures with respect to filings.

In accordance with §§ 201.16(c) and 207.3 of the rules, each document filed by a party to the reviews must be served on all other parties to the reviews (as identified by either the public or BPI service list), and a certificate of service must be timely filed. The Secretary will not accept a document for filing without a certificate of service.

Determination.—The Commission has determined these reviews are extraordinarily complicated and therefore has determined to exercise its authority to extend the review period by up to 90 days pursuant to 19 U.S.C. 1675(c)(5)(B).

Authority: These reviews are being conducted under authority of title VII of the Act; this notice is published pursuant to § 207.62 of the Commission’s rules.

By order of the Commission.
Issued: January 17, 2025.

Lisa Barton,

Secretary to the Commission.

[FR Doc. 2025–01651 Filed 1–23–25; 8:45 am]

BILLING CODE 7020–02–P

² The Commission has found the response submitted on behalf of Lumimove Inc. d/b/a WPC Technologies to be adequate. Comments from other interested parties will not be accepted (*see* 19 CFR 207.62(d)(2)).

INTERNATIONAL TRADE COMMISSION

[Investigation Nos. 701–TA–704–705 and 731–TA–1664–1666 (Final)]

Paper Plates From China, Thailand, and Vietnam; Cancellation of Hearing for Final Phase Antidumping and Countervailing Duty Investigations

AGENCY: United States International Trade Commission.

ACTION: Notice.

DATES: January 17, 2025.

FOR FURTHER INFORMATION CONTACT: Stamen Borisson ((202) 205–3125), Office of Investigations, U.S. International Trade Commission, 500 E Street SW, Washington, DC 20436. Hearing-impaired persons can obtain information on this matter by contacting the Commission’s TDD terminal on 202–205–1810. Persons with mobility impairments who will need special assistance in gaining access to the Commission should contact the Office of the Secretary at 202–205–2000. General information concerning the Commission may also be obtained by accessing its internet server (<http://www.usitc.gov>). The public record for these reviews may be viewed on the Commission’s electronic docket (EDIS) at <http://edis.usitc.gov>.

SUPPLEMENTARY INFORMATION: Effective September 5, 2024, the Commission established a schedule for the final phase of these investigations (89 FR 76508, September 18, 2024). On January 16, 2025, counsel for the American Paper Plate Coalition filed its request to appear at the hearing. No other parties submitted a request to appear at the hearing. On January 17, 2025, counsel withdrew their request to appear at the hearing. Counsel indicated a willingness to submit written responses to any Commission questions in lieu of an actual hearing. Consequently, the public hearing in connection with these investigations, scheduled to begin at 9:30 a.m. on Thursday, January 23, 2025, is cancelled. Parties to these investigations should respond to any written questions posed by the Commission in their posthearing briefs, which are due to be filed on January 30, 2025.

For further information concerning these investigations see the Commission’s notice cited above and the Commission’s Rules of Practice and Procedure, part 201, subparts A through E (19 CFR part 201), and part 207, subparts A and C (19 CFR part 207).

Authority: These investigations are being conducted under authority of title

VII of the Tariff Act of 1930; this notice is published pursuant to section 207.21 of the Commission’s rules.

By order of the Commission.

Issued: January 17, 2025.

Lisa Barton,

Secretary to the Commission.

[FR Doc. 2025–01646 Filed 1–23–25; 8:45 am]

BILLING CODE 7020–02–P

JUDICIAL CONFERENCE OF THE UNITED STATES

Advisory Committee on Civil Rules; Meeting of the Judicial Conference

AGENCY: Judicial Conference of the United States.

ACTION: Advisory Committee on Civil Rules; notice of open meeting.

SUMMARY: The Advisory Committee on Civil Rules will hold an in-person meeting in hybrid format with remote attendance options on April 1, 2025 in Atlanta, GA. The meeting is open to the public for observation but not participation. Please see the Supplementary Information section in this notice for instructions on observing the meeting.

DATES: April 1, 2025 (meeting date) and March 25, 2025 (registration deadline for in-person observation).

ADDRESSES: An agenda and supporting materials will be posted at least 7 days in advance of the meeting at: <https://www.uscourts.gov/forms-rules/records-rules-committees/agenda-books>.

FOR FURTHER INFORMATION CONTACT: Shelly Cox, Rules Committee Staff, Administrative Office of the U.S. Courts, Thurgood Marshall Federal Judiciary Building, One Columbus Circle NE, Suite 7–300, Washington, DC 20544, Phone (202) 502–1820, RulesCommittee_Secretary@ao.uscourts.gov.

SUPPLEMENTARY INFORMATION: To observe the meeting in person, individuals must contact the office listed above by 5 p.m. (eastern time) on March 25, 2025. After this deadline, only remote observation is permitted. Remote registration is available until the meeting date, provided it is completed before the projected end time.

(Authority: 28 U.S.C. 2073.)

Dated: January 21, 2025.

Shelly L. Cox,

Management Analyst, Rules Committee Staff.

[FR Doc. 2025–01708 Filed 1–23–25; 8:45 am]

BILLING CODE 2210–55–P

APPENDIX C
SUMMARY DATA

Table C-1

Paper plates: Summary data concerning the U.S. market, by item and period

Quantity=1,000 units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per 1,000 units; Period changes=percent--exceptions noted

Item	Reported data					Period changes			
	Calendar year		2023	Jan-Jun		Comparison years			Jan-Jun
	2021	2022		2023	2024	2021-23	2021-22	2022-23	2023-24
U.S. consumption quantity:									
Amount.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Producers' share (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Importers' share (fn1):									
China.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Thailand.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Vietnam.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Subject sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	***	***	▼***	▲***	▼***	▲***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
U.S. consumption value:									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Producers' share (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▼***
Importers' share (fn1):									
China.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Thailand.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Vietnam.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Subject sources.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Nonsubject sources.....	***	***	***	***	***	▼***	▲***	▼***	▲***
All import sources.....	***	***	***	***	***	▲***	▲***	▼***	▲***
U.S. importers' U.S. shipments of imports from:									
China:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Thailand:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Vietnam:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Subject 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

Paper plates: Summary data concerning the U.S. market, by item and period

Quantity=1,000 units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per 1,000 units; Period changes=percent--exceptions noted

Item	Reported data					Period changes			
	Calendar year		Jan-Jun			Comparison years			Jan-Jun
	2021	2022	2023	2023	2024	2021-23	2021-22	2022-23	2023-24
U.S. producers':									
Practical capacity quantity.....	73,350,403	77,265,023	82,066,293	40,213,263	41,181,358	▲11.9	▲5.3	▲6.2	▲2.4
Production quantity.....	52,665,368	53,119,386	49,046,653	24,206,853	26,734,735	▼(6.9)	▲0.9	▼(7.7)	▲10.4
Capacity utilization (fn1).....	71.8	68.7	59.8	60.2	64.9	▼(12.0)	▼(3.1)	▼(9.0)	▲4.7
U.S. shipments:									
Quantity.....	52,471,202	50,716,568	50,071,508	24,974,584	26,230,272	▼(4.6)	▼(3.3)	▼(1.3)	▲5.0
Value.....	2,245,358	2,654,288	2,871,044	1,420,230	1,441,263	▲27.9	▲18.2	▲8.2	▲1.5
Unit value.....	\$42.79	\$52.34	\$57.34	\$56.87	\$54.95	▲34.0	▲22.3	▲9.6	▼(3.4)
Export shipments:									
Quantity.....	180,528	185,964	178,540	101,400	109,487	▼(1.1)	▲3.0	▼(4.0)	▲8.0
Value.....	8,198	9,825	10,378	5,770	6,332	▲26.6	▲19.8	▲5.6	▲9.7
Unit value.....	\$45.41	\$52.83	\$58.13	\$56.90	\$57.83	▲28.0	▲16.3	▲10.0	▲1.6
Ending inventory quantity.....	3,737,804	5,966,092	4,745,870	5,067,854	5,130,379	▲27.0	▲59.6	▼(20.5)	▲1.2
Inventories/total shipments (fn1).....	7.1	11.7	9.4	10.1	9.7	▲2.3	▲4.6	▼(2.3)	▼(0.4)
Production workers.....	4,887	5,146	4,804	4,832	4,964	▼(1.7)	▲5.3	▼(6.6)	▲2.7
Hours worked (1,000s).....	11,196	11,728	10,949	5,366	5,640	▼(2.2)	▲4.8	▼(6.6)	▲5.1
Wages paid (\$1,000).....	226,803	255,591	242,948	119,276	128,640	▲7.1	▲12.7	▼(4.9)	▲7.9
Hourly wages (dollars per hour).....	\$20.26	\$21.79	\$22.19	\$22.23	\$22.81	▲9.5	▲7.6	▲1.8	▲2.6
Productivity (units per hour).....	4,704	4,529	4,480	4,511	4,740	▼(4.8)	▼(3.7)	▼(1.1)	▲5.1
Unit labor costs.....	\$4.31	\$4.81	\$4.95	\$4.93	\$4.81	▲15.0	▲11.7	▲2.9	▼(2.3)
Net sales:									
Quantity.....	52,651,730	50,902,531	50,250,048	25,075,984	26,339,659	▼(4.6)	▼(3.3)	▼(1.3)	▲5.0
Value.....	2,253,556	2,664,113	2,881,423	1,426,010	1,447,594	▲27.9	▲18.2	▲8.2	▲1.5
Unit value.....	\$42.80	\$52.34	\$57.34	\$56.87	\$54.96	▲34.0	▲22.3	▲9.6	▼(3.4)
Cost of goods sold (COGS).....	1,752,221	2,061,710	2,276,718	1,142,390	1,091,897	▲29.9	▲17.7	▲10.4	▼(4.4)
Gross profit or (loss) (fn2).....	501,335	602,403	604,705	283,620	355,697	▲20.6	▲20.2	▲0.4	▲25.4
SG&A expenses.....	147,243	161,449	188,312	93,567	95,810	▲27.9	▲9.6	▲16.6	▲2.4
Operating income or (loss) (fn2).....	354,092	440,954	416,393	190,053	259,887	▲17.6	▲24.5	▼(5.6)	▲36.7
Net income or (loss) (fn2).....	***	***	***	***	***	▲***	▲***	▼***	▲***
Unit COGS.....	\$33.28	\$40.50	\$45.31	\$45.56	\$41.45	▲36.1	▲21.7	▲11.9	▼(9.0)
Unit SG&A expenses.....	\$2.80	\$3.17	\$3.75	\$3.73	\$3.64	▲34.0	▲13.4	▲18.2	▼(2.5)
Unit operating income or (loss) (fn2).....	\$6.73	\$8.66	\$8.29	\$7.58	\$9.87	▲23.2	▲28.8	▼(4.3)	▲30.2
Unit net income or (loss) (fn2).....	***	***	***	***	***	▲***	▲***	▼***	▲***
COGS/sales (fn1).....	77.8	77.4	79.0	80.1	75.4	▲1.3	▼(0.4)	▲1.6	▼(4.7)
Operating income or (loss)/sales (fn1).....	15.7	16.6	14.5	13.3	18.0	▼(1.3)	▲0.8	▼(2.1)	▲4.6
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 containing these data are contained in parts III, IV, VI, and VII of this report.

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.

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.

APPENDIX D

U.S. SHIPMENTS AND MARKET BY CUSTOMER TYPE AND BRANDING

Table D-1

Paper plates: U.S. producers' U.S. shipments by customer type, branding type, and period

Quantity in 1,000 units; Value in 1,000 dollars; Unit values in dollars per 1,000 units; Shares in percent

Customer type	Branding type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Distributors	Branded	Quantity	***	***	***	***	***
Distributors	Private label	Quantity	***	***	***	***	***
Distributors	All branding types	Quantity	***	***	***	***	***
Distributors	Branded	Value	***	***	***	***	***
Distributors	Private label	Value	***	***	***	***	***
Distributors	All branding types	Value	***	***	***	***	***
Distributors	Branded	Unit value	***	***	***	***	***
Distributors	Private label	Unit value	***	***	***	***	***
Distributors	All branding types	Unit value	***	***	***	***	***
Distributors	Branded	Share of quantity	***	***	***	***	***
Distributors	Private label	Share of quantity	***	***	***	***	***
Distributors	All branding types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Distributors	Branded	Share of value	***	***	***	***	***
Distributors	Private label	Share of value	***	***	***	***	***
Distributors	All branding types	Share of value	100.0	100.0	100.0	100.0	100.0
Retailers / end users	Branded	Quantity	***	***	***	***	***
Retailers / end users	Private label	Quantity	***	***	***	***	***
Retailers / end users	All branding types	Quantity	***	***	***	***	***
Retailers / end users	Branded	Value	***	***	***	***	***
Retailers / end users	Private label	Value	***	***	***	***	***
Retailers / end users	All branding types	Value	***	***	***	***	***
Retailers / end users	Branded	Unit value	***	***	***	***	***
Retailers / end users	Private label	Unit value	***	***	***	***	***
Retailers / end users	All branding types	Unit value	***	***	***	***	***
Retailers / end users	Branded	Share of quantity	***	***	***	***	***
Retailers / end users	Private label	Share of quantity	***	***	***	***	***
Retailers / end users	All branding types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Retailers / end users	Branded	Share of value	***	***	***	***	***
Retailers / end users	Private label	Share of value	***	***	***	***	***
Retailers / end users	All branding types	Share of value	100.0	100.0	100.0	100.0	100.0

Table continued.

Table D-1 Continued

Paper plates: U.S. producers' U.S. shipments by customer type, branding type, and period

Quantity in 1,000 units; Value in 1,000 dollars; Unit values in dollars per 1,000 units; Shares in percent

Customer type	Branding type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
All customer types	Branded	Quantity	***	***	***	***	***
All customer types	Private label	Quantity	***	***	***	***	***
All customer types	All branding types	Quantity	***	***	***	***	***
All customer types	Branded	Value	***	***	***	***	***
All customer types	Private label	Value	***	***	***	***	***
All customer types	All branding types	Value	***	***	***	***	***
All customer types	Branded	Unit value	***	***	***	***	***
All customer types	Private label	Unit value	***	***	***	***	***
All customer types	All branding types	Unit value	***	***	***	***	***
All customer types	Branded	Share of quantity	***	***	***	***	***
All customer types	Private label	Share of quantity	***	***	***	***	***
All customer types	All branding types	Share of quantity	100.0	100.0	100.0	100.0	100.0
All customer types	Branded	Share of value	***	***	***	***	***
All customer types	Private label	Share of value	***	***	***	***	***
All customer types	All branding types	Share of value	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table D-2

Paper plates: U.S. importers' U.S. shipments of imports from China by customer type, branding type, and period

Quantity in 1,000 units; Value in 1,000 dollars; Unit values in dollars per 1,000 units; Shares in percent

Customer type	Branding type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Distributors	Branded	Quantity	***	***	***	***	***
Distributors	Private label	Quantity	***	***	***	***	***
Distributors	All branding types	Quantity	***	***	***	***	***
Distributors	Branded	Value	***	***	***	***	***
Distributors	Private label	Value	***	***	***	***	***
Distributors	All branding types	Value	***	***	***	***	***
Distributors	Branded	Unit value	***	***	***	***	***
Distributors	Private label	Unit value	***	***	***	***	***
Distributors	All branding types	Unit value	***	***	***	***	***
Distributors	Branded	Share of quantity	***	***	***	***	***
Distributors	Private label	Share of quantity	***	***	***	***	***
Distributors	All branding types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Distributors	Branded	Share of value	***	***	***	***	***
Distributors	Private label	Share of value	***	***	***	***	***
Distributors	All branding types	Share of value	100.0	100.0	100.0	100.0	100.0
Retailers / end users	Branded	Quantity	***	***	***	***	***
Retailers / end users	Private label	Quantity	***	***	***	***	***
Retailers / end users	All branding types	Quantity	***	***	***	***	***
Retailers / end users	Branded	Value	***	***	***	***	***
Retailers / end users	Private label	Value	***	***	***	***	***
Retailers / end users	All branding types	Value	***	***	***	***	***
Retailers / end users	Branded	Unit value	***	***	***	***	***
Retailers / end users	Private label	Unit value	***	***	***	***	***
Retailers / end users	All branding types	Unit value	***	***	***	***	***
Retailers / end users	Branded	Share of quantity	***	***	***	***	***
Retailers / end users	Private label	Share of quantity	***	***	***	***	***
Retailers / end users	All branding types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Retailers / end users	Branded	Share of value	***	***	***	***	***
Retailers / end users	Private label	Share of value	***	***	***	***	***
Retailers / end users	All branding types	Share of value	100.0	100.0	100.0	100.0	100.0

Table continued.

Table D-2 Continued

Paper plates: U.S. importers' U.S. shipments of imports from China by customer type, branding type, and period

Quantity in 1,000 units; Value in 1,000 dollars; Unit values in dollars per 1,000 units; Shares in percent

Customer type	Branding type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
All customer types	Branded	Quantity	***	***	***	***	***
All customer types	Private label	Quantity	***	***	***	***	***
All customer types	All branding types	Quantity	***	***	***	***	***
All customer types	Branded	Value	***	***	***	***	***
All customer types	Private label	Value	***	***	***	***	***
All customer types	All branding types	Value	***	***	***	***	***
All customer types	Branded	Unit value	***	***	***	***	***
All customer types	Private label	Unit value	***	***	***	***	***
All customer types	All branding types	Unit value	***	***	***	***	***
All customer types	Branded	Share of quantity	***	***	***	***	***
All customer types	Private label	Share of quantity	***	***	***	***	***
All customer types	All branding types	Share of quantity	100.0	100.0	100.0	100.0	100.0
All customer types	Branded	Share of value	***	***	***	***	***
All customer types	Private label	Share of value	***	***	***	***	***
All customer types	All branding types	Share of value	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table D-3

Paper plates: U.S. importers' U.S. shipments of imports from Thailand by customer type, branding type, and period

Quantity in 1,000 units; Value in 1,000 dollars; Unit values in dollars per 1,000 units; Shares in percent

Customer type	Branding type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Distributors	Branded	Quantity	***	***	***	***	***
Distributors	Private label	Quantity	***	***	***	***	***
Distributors	All branding types	Quantity	***	***	***	***	***
Distributors	Branded	Value	***	***	***	***	***
Distributors	Private label	Value	***	***	***	***	***
Distributors	All branding types	Value	***	***	***	***	***
Distributors	Branded	Unit value	***	***	***	***	***
Distributors	Private label	Unit value	***	***	***	***	***
Distributors	All branding types	Unit value	***	***	***	***	***
Distributors	Branded	Share of quantity	***	***	***	***	***
Distributors	Private label	Share of quantity	***	***	***	***	***
Distributors	All branding types	Share of quantity	***	***	***	***	***
Distributors	Branded	Share of value	***	***	***	***	***
Distributors	Private label	Share of value	***	***	***	***	***
Distributors	All branding types	Share of value	***	***	***	***	***
Retailers / end users	Branded	Quantity	***	***	***	***	***
Retailers / end users	Private label	Quantity	***	***	***	***	***
Retailers / end users	All branding types	Quantity	***	***	***	***	***
Retailers / end users	Branded	Value	***	***	***	***	***
Retailers / end users	Private label	Value	***	***	***	***	***
Retailers / end users	All branding types	Value	***	***	***	***	***
Retailers / end users	Branded	Unit value	***	***	***	***	***
Retailers / end users	Private label	Unit value	***	***	***	***	***
Retailers / end users	All branding types	Unit value	***	***	***	***	***
Retailers / end users	Branded	Share of quantity	***	***	***	***	***
Retailers / end users	Private label	Share of quantity	***	***	***	***	***
Retailers / end users	All branding types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Retailers / end users	Branded	Share of value	***	***	***	***	***
Retailers / end users	Private label	Share of value	***	***	***	***	***
Retailers / end users	All branding types	Share of value	100.0	100.0	100.0	100.0	100.0

Table continued.

Table D-3 Continued

Paper plates: U.S. importers' U.S. shipments of imports from Thailand by customer type, branding type, and period

Quantity in 1,000 units; Value in 1,000 dollars; Unit values in dollars per 1,000 units; Shares in percent

Customer type	Branding type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
All customer types	Branded	Quantity	***	***	***	***	***
All customer types	Private label	Quantity	***	***	***	***	***
All customer types	All branding types	Quantity	***	***	***	***	***
All customer types	Branded	Value	***	***	***	***	***
All customer types	Private label	Value	***	***	***	***	***
All customer types	All branding types	Value	***	***	***	***	***
All customer types	Branded	Unit value	***	***	***	***	***
All customer types	Private label	Unit value	***	***	***	***	***
All customer types	All branding types	Unit value	***	***	***	***	***
All customer types	Branded	Share of quantity	***	***	***	***	***
All customer types	Private label	Share of quantity	***	***	***	***	***
All customer types	All branding types	Share of quantity	100.0	100.0	100.0	100.0	100.0
All customer types	Branded	Share of value	***	***	***	***	***
All customer types	Private label	Share of value	***	***	***	***	***
All customer types	All branding types	Share of value	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table D-4**Paper plates: U.S. importers' U.S. shipments of imports from Vietnam by customer type, branding type, and period**

Quantity in 1,000 units; Value in 1,000 dollars; Unit values in dollars per 1,000 units; Shares in percent

Customer type	Branding type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Distributors	Branded	Quantity	***	***	***	***	***
Distributors	Private label	Quantity	***	***	***	***	***
Distributors	All branding types	Quantity	***	***	***	***	***
Distributors	Branded	Value	***	***	***	***	***
Distributors	Private label	Value	***	***	***	***	***
Distributors	All branding types	Value	***	***	***	***	***
Distributors	Branded	Unit value	***	***	***	***	***
Distributors	Private label	Unit value	***	***	***	***	***
Distributors	All branding types	Unit value	***	***	***	***	***
Distributors	Branded	Share of quantity	***	***	***	***	***
Distributors	Private label	Share of quantity	***	***	***	***	***
Distributors	All branding types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Distributors	Branded	Share of value	***	***	***	***	***
Distributors	Private label	Share of value	***	***	***	***	***
Distributors	All branding types	Share of value	100.0	100.0	100.0	100.0	100.0
Retailers / end users	Branded	Quantity	***	***	***	***	***
Retailers / end users	Private label	Quantity	***	***	***	***	***
Retailers / end users	All branding types	Quantity	***	***	***	***	***
Retailers / end users	Branded	Value	***	***	***	***	***
Retailers / end users	Private label	Value	***	***	***	***	***
Retailers / end users	All branding types	Value	***	***	***	***	***
Retailers / end users	Branded	Unit value	***	***	***	***	***
Retailers / end users	Private label	Unit value	***	***	***	***	***
Retailers / end users	All branding types	Unit value	***	***	***	***	***
Retailers / end users	Branded	Share of quantity	***	***	***	***	***
Retailers / end users	Private label	Share of quantity	***	***	***	***	***
Retailers / end users	All branding types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Retailers / end users	Branded	Share of value	***	***	***	***	***
Retailers / end users	Private label	Share of value	***	***	***	***	***
Retailers / end users	All branding types	Share of value	100.0	100.0	100.0	100.0	100.0

Table continued.

Table D-4 Continued

Paper plates: U.S. importers' U.S. shipments of imports from Vietnam by customer type, branding type, and period

Quantity in 1,000 units; Value in 1,000 dollars; Unit values in dollars per 1,000 units; Shares in percent

Customer type	Branding type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
All customer types	Branded	Quantity	***	***	***	***	***
All customer types	Private label	Quantity	***	***	***	***	***
All customer types	All branding types	Quantity	***	***	***	***	***
All customer types	Branded	Value	***	***	***	***	***
All customer types	Private label	Value	***	***	***	***	***
All customer types	All branding types	Value	***	***	***	***	***
All customer types	Branded	Unit value	***	***	***	***	***
All customer types	Private label	Unit value	***	***	***	***	***
All customer types	All branding types	Unit value	***	***	***	***	***
All customer types	Branded	Share of quantity	***	***	***	***	***
All customer types	Private label	Share of quantity	***	***	***	***	***
All customer types	All branding types	Share of quantity	100.0	100.0	100.0	100.0	100.0
All customer types	Branded	Share of value	***	***	***	***	***
All customer types	Private label	Share of value	***	***	***	***	***
All customer types	All branding types	Share of value	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table D-5

Paper plates: U.S. importers' U.S. shipments of imports from subject sources by customer type, branding type, and period

Quantity in 1,000 units; Value in 1,000 dollars; Unit values in dollars per 1,000 units; Shares in percent

Customer type	Branding type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Distributors	Branded	Quantity	***	***	***	***	***
Distributors	Private label	Quantity	***	***	***	***	***
Distributors	All branding types	Quantity	***	***	***	***	***
Distributors	Branded	Value	***	***	***	***	***
Distributors	Private label	Value	***	***	***	***	***
Distributors	All branding types	Value	***	***	***	***	***
Distributors	Branded	Unit value	***	***	***	***	***
Distributors	Private label	Unit value	***	***	***	***	***
Distributors	All branding types	Unit value	***	***	***	***	***
Distributors	Branded	Share of quantity	***	***	***	***	***
Distributors	Private label	Share of quantity	***	***	***	***	***
Distributors	All branding types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Distributors	Branded	Share of value	***	***	***	***	***
Distributors	Private label	Share of value	***	***	***	***	***
Distributors	All branding types	Share of value	100.0	100.0	100.0	100.0	100.0
Retailers / end users	Branded	Quantity	***	***	***	***	***
Retailers / end users	Private label	Quantity	***	***	***	***	***
Retailers / end users	All branding types	Quantity	***	***	***	***	***
Retailers / end users	Branded	Value	***	***	***	***	***
Retailers / end users	Private label	Value	***	***	***	***	***
Retailers / end users	All branding types	Value	***	***	***	***	***
Retailers / end users	Branded	Unit value	***	***	***	***	***
Retailers / end users	Private label	Unit value	***	***	***	***	***
Retailers / end users	All branding types	Unit value	***	***	***	***	***
Retailers / end users	Branded	Share of quantity	***	***	***	***	***
Retailers / end users	Private label	Share of quantity	***	***	***	***	***
Retailers / end users	All branding types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Retailers / end users	Branded	Share of value	***	***	***	***	***
Retailers / end users	Private label	Share of value	***	***	***	***	***
Retailers / end users	All branding types	Share of value	100.0	100.0	100.0	100.0	100.0

Table continued.

Table D-5 Continued

Paper plates: U.S. importers' U.S. shipments of imports from subject sources by customer type, branding type, and period

Quantity in 1,000 units; Value in 1,000 dollars; Unit values in dollars per 1,000 units; Shares in percent

Customer type	Branding type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
All customer types	Branded	Quantity	***	***	***	***	***
All customer types	Private label	Quantity	***	***	***	***	***
All customer types	All branding types	Quantity	***	***	***	***	***
All customer types	Branded	Value	***	***	***	***	***
All customer types	Private label	Value	***	***	***	***	***
All customer types	All branding types	Value	***	***	***	***	***
All customer types	Branded	Unit value	***	***	***	***	***
All customer types	Private label	Unit value	***	***	***	***	***
All customer types	All branding types	Unit value	***	***	***	***	***
All customer types	Branded	Share of quantity	***	***	***	***	***
All customer types	Private label	Share of quantity	***	***	***	***	***
All customer types	All branding types	Share of quantity	100.0	100.0	100.0	100.0	100.0
All customer types	Branded	Share of value	***	***	***	***	***
All customer types	Private label	Share of value	***	***	***	***	***
All customer types	All branding types	Share of value	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table D-6

Paper plates: U.S. importers' U.S. shipments of imports from nonsubject sources by customer type, branding type, and period

Quantity in 1,000 units; Value in 1,000 dollars; Unit values in dollars per 1,000 units; Shares in percent

Customer type	Branding type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Distributors	Branded	Quantity	***	***	***	***	***
Distributors	Private label	Quantity	***	***	***	***	***
Distributors	All branding types	Quantity	***	***	***	***	***
Distributors	Branded	Value	***	***	***	***	***
Distributors	Private label	Value	***	***	***	***	***
Distributors	All branding types	Value	***	***	***	***	***
Distributors	Branded	Unit value	***	***	***	***	***
Distributors	Private label	Unit value	***	***	***	***	***
Distributors	All branding types	Unit value	***	***	***	***	***
Distributors	Branded	Share of quantity	***	***	***	***	***
Distributors	Private label	Share of quantity	***	***	***	***	***
Distributors	All branding types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Distributors	Branded	Share of value	***	***	***	***	***
Distributors	Private label	Share of value	***	***	***	***	***
Distributors	All branding types	Share of value	100.0	100.0	100.0	100.0	100.0
Retailers / end users	Branded	Quantity	***	***	***	***	***
Retailers / end users	Private label	Quantity	***	***	***	***	***
Retailers / end users	All branding types	Quantity	***	***	***	***	***
Retailers / end users	Branded	Value	***	***	***	***	***
Retailers / end users	Private label	Value	***	***	***	***	***
Retailers / end users	All branding types	Value	***	***	***	***	***
Retailers / end users	Branded	Unit value	***	***	***	***	***
Retailers / end users	Private label	Unit value	***	***	***	***	***
Retailers / end users	All branding types	Unit value	***	***	***	***	***
Retailers / end users	Branded	Share of quantity	***	***	***	***	***
Retailers / end users	Private label	Share of quantity	***	***	***	***	***
Retailers / end users	All branding types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Retailers / end users	Branded	Share of value	***	***	***	***	***
Retailers / end users	Private label	Share of value	***	***	***	***	***
Retailers / end users	All branding types	Share of value	100.0	100.0	100.0	100.0	100.0

Table continued.

Table D-6 Continued

Paper plates: U.S. importers' U.S. shipments of imports from nonsubject sources by customer type, branding type, and period

Quantity in 1,000 units; Value in 1,000 dollars; Unit values in dollars per 1,000 units; Shares in percent

Customer type	Branding type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
All customer types	Branded	Quantity	***	***	***	***	***
All customer types	Private label	Quantity	***	***	***	***	***
All customer types	All branding types	Quantity	***	***	***	***	***
All customer types	Branded	Value	***	***	***	***	***
All customer types	Private label	Value	***	***	***	***	***
All customer types	All branding types	Value	***	***	***	***	***
All customer types	Branded	Unit value	***	***	***	***	***
All customer types	Private label	Unit value	***	***	***	***	***
All customer types	All branding types	Unit value	***	***	***	***	***
All customer types	Branded	Share of quantity	***	***	***	***	***
All customer types	Private label	Share of quantity	***	***	***	***	***
All customer types	All branding types	Share of quantity	100.0	100.0	100.0	100.0	100.0
All customer types	Branded	Share of value	***	***	***	***	***
All customer types	Private label	Share of value	***	***	***	***	***
All customer types	All branding types	Share of value	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table D-7

Paper plates: U.S. importers' U.S. shipments of imports from all import sources by customer type, branding type, and period

Quantity in 1,000 units; Value in 1,000 dollars; Unit values in dollars per 1,000 units; Shares in percent

Customer type	Branding type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
Distributors	Branded	Quantity	***	***	***	***	***
Distributors	Private label	Quantity	***	***	***	***	***
Distributors	All branding types	Quantity	***	***	***	***	***
Distributors	Branded	Value	***	***	***	***	***
Distributors	Private label	Value	***	***	***	***	***
Distributors	All branding types	Value	***	***	***	***	***
Distributors	Branded	Unit value	***	***	***	***	***
Distributors	Private label	Unit value	***	***	***	***	***
Distributors	All branding types	Unit value	***	***	***	***	***
Distributors	Branded	Share of quantity	***	***	***	***	***
Distributors	Private label	Share of quantity	***	***	***	***	***
Distributors	All branding types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Distributors	Branded	Share of value	***	***	***	***	***
Distributors	Private label	Share of value	***	***	***	***	***
Distributors	All branding types	Share of value	100.0	100.0	100.0	100.0	100.0
Retailers / end users	Branded	Quantity	***	***	***	***	***
Retailers / end users	Private label	Quantity	***	***	***	***	***
Retailers / end users	All branding types	Quantity	***	***	***	***	***
Retailers / end users	Branded	Value	***	***	***	***	***
Retailers / end users	Private label	Value	***	***	***	***	***
Retailers / end users	All branding types	Value	***	***	***	***	***
Retailers / end users	Branded	Unit value	***	***	***	***	***
Retailers / end users	Private label	Unit value	***	***	***	***	***
Retailers / end users	All branding types	Unit value	***	***	***	***	***
Retailers / end users	Branded	Share of quantity	***	***	***	***	***
Retailers / end users	Private label	Share of quantity	***	***	***	***	***
Retailers / end users	All branding types	Share of quantity	100.0	100.0	100.0	100.0	100.0
Retailers / end users	Branded	Share of value	***	***	***	***	***
Retailers / end users	Private label	Share of value	***	***	***	***	***
Retailers / end users	All branding types	Share of value	100.0	100.0	100.0	100.0	100.0

Table continued.

Table D-7 Continued

Paper plates: U.S. importers' U.S. shipments of imports from all import sources by customer type, branding type, and period

Quantity in 1,000 units; Value in 1,000 dollars; Unit values in dollars per 1,000 units; Shares in percent

Customer type	Branding type	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
All customer types	Branded	Quantity	***	***	***	***	***
All customer types	Private label	Quantity	***	***	***	***	***
All customer types	All branding types	Quantity	***	***	***	***	***
All customer types	Branded	Value	***	***	***	***	***
All customer types	Private label	Value	***	***	***	***	***
All customer types	All branding types	Value	***	***	***	***	***
All customer types	Branded	Unit value	***	***	***	***	***
All customer types	Private label	Unit value	***	***	***	***	***
All customer types	All branding types	Unit value	***	***	***	***	***
All customer types	Branded	Share of quantity	***	***	***	***	***
All customer types	Private label	Share of quantity	***	***	***	***	***
All customer types	All branding types	Share of quantity	100.0	100.0	100.0	100.0	100.0
All customer types	Branded	Share of value	***	***	***	***	***
All customer types	Private label	Share of value	***	***	***	***	***
All customer types	All branding types	Share of value	100.0	100.0	100.0	100.0	100.0

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure D-1

Paper plates: Average unit values of U.S. producers' and U.S. importers' U.S. shipments of branded product to distributors, by source and period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires, as shown in tables D-1, D -2, D -3, D -4, and D -6.

Figure D-2

Paper plates: Average unit values of U.S. producers' and U.S. importers' U.S. shipments of private label product to distributors, by source and period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires, as shown in tables D-1, D -2, D -3, D -4, and D -6.

Figure D-3

Paper plates: Average unit values of U.S. producers' and U.S. importers' U.S. shipments of branded product to retailers / end users, by source and period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires, as shown in tables D-1, D -2, D -3, D -4, and D -6.

Figure D-4

Paper plates: Average unit values of U.S. producers' and U.S. importers' U.S. shipments of private label product to retailers / end users, by source and period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires, as shown in tables D-1, D -2, D -3, D -4, and D -6.

Table D-8**Paper plates: U.S. producers' and U.S. importers' branded U.S. shipments to distributors, by source and period**

Quantity in 1,000 units; Shares and ratios in percent; Ratios are to overall apparent consumption quantity

Source	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
Thailand	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Thailand	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0
U.S. producers	Ratio	***	***	***	***	***
China	Ratio	***	***	***	***	***
Thailand	Ratio	***	***	***	***	***
Vietnam	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***
All sources	Ratio	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". Ratios are to overall apparent consumption quantity.

Table D-9**Paper plates: U.S. producers' and U.S. importers' branded U.S. shipments to retailers and end users, by source and period**

Quantity in 1,000 units; Shares and ratios in percent; Ratios are to overall apparent consumption quantity

Source	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
Thailand	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Thailand	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0
U.S. producers	Ratio	***	***	***	***	***
China	Ratio	***	***	***	***	***
Thailand	Ratio	***	***	***	***	***
Vietnam	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***
All sources	Ratio	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". Ratios are to overall apparent consumption quantity.

Table D-10**Paper plates: U.S. producers' and U.S. importers' branded U.S. shipments, by source and period**

Quantity in 1,000 units; Shares and ratios in percent; Ratios are to overall apparent consumption quantity

Source	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
Thailand	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Thailand	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0
U.S. producers	Ratio	***	***	***	***	***
China	Ratio	***	***	***	***	***
Thailand	Ratio	***	***	***	***	***
Vietnam	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***
All sources	Ratio	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". Ratios are to overall apparent consumption quantity.

Table D-11

Paper plates: Market for U.S. shipments of private labels to distributors, by source and period

Quantity in 1,000 units; Shares and ratios in percent; Ratios are to overall apparent consumption quantity

Source	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
Thailand	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Thailand	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0
U.S. producers	Ratio	***	***	***	***	***
China	Ratio	***	***	***	***	***
Thailand	Ratio	***	***	***	***	***
Vietnam	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***
All sources	Ratio	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "--". Ratios are to overall apparent consumption quantity.

Table D-12

Paper plates: Market for U.S. shipments of private labels to retailers / end users, by source and period

Quantity in 1,000 units; Shares and ratios in percent; Ratios are to overall apparent consumption quantity

Source	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
Thailand	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Thailand	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0
U.S. producers	Ratio	***	***	***	***	***
China	Ratio	***	***	***	***	***
Thailand	Ratio	***	***	***	***	***
Vietnam	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***
All sources	Ratio	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". Ratios are to overall apparent consumption quantity.

Table D-13
Paper plates: Market for U.S. shipments of private labels, by source and period

Quantity in 1,000 units; Shares and ratios in percent; Ratios are to overall apparent consumption quantity

Source	Measure	2021	2022	2023	Jan-Jun 2023	Jan-Jun 2024
U.S. producers	Quantity	***	***	***	***	***
China	Quantity	***	***	***	***	***
Thailand	Quantity	***	***	***	***	***
Vietnam	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share	***	***	***	***	***
China	Share	***	***	***	***	***
Thailand	Share	***	***	***	***	***
Vietnam	Share	***	***	***	***	***
Subject sources	Share	***	***	***	***	***
Nonsubject sources	Share	***	***	***	***	***
All import sources	Share	***	***	***	***	***
All sources	Share	100.0	100.0	100.0	100.0	100.0
U.S. producers	Ratio	***	***	***	***	***
China	Ratio	***	***	***	***	***
Thailand	Ratio	***	***	***	***	***
Vietnam	Ratio	***	***	***	***	***
Subject sources	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***
All sources	Ratio	***	***	***	***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". Ratios are to overall apparent consumption quantity.

APPENDIX E

U.S. SHIPMENTS BY SIZE AND PRODUCT TYPE

Table E-1
Paper plates: U.S. producers' U.S. shipments in 2023, by size and product type

Quantity in 1,000 units; Shares in percent

Size	Measure	Solid white	Special occasion	Other	All colors
≤7.5 inches	Quantity	***	***	***	***
>7.5 inches to ≤9.0 inches	Quantity	***	***	***	***
>9.0 inches	Quantity	***	***	***	***
All sizes	Quantity	8,895,115	6,197,428	34,978,963	50,071,506
≤7.5 inches	Share down	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down	***	***	***	***
>9.0 inches	Share down	***	***	***	***
All sizes	Share down	100.0	100.0	100.0	***
≤7.5 inches	Share across	***	***	***	***
>7.5 inches to ≤9.0 inches	Share across	***	***	***	***
>9.0 inches	Share across	***	***	***	***
All sizes	Share across	17.8	12.4	69.9	100.0
≤7.5 inches	Share down and across	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down and across	***	***	***	***
>9.0 inches	Share down and across	***	***	***	***
All sizes	Share down and across	***	***	***	100.0

Table continued.

Table E-1 Continued

Paper plates: U.S. producers' U.S. shipments in 2023, by size and product type

Value in 1,000 dollars; Shares in percent

Size and branding type	Measure	Solid white	Special occasion	Other	All colors
≤7.5 inches	Value	***	***	***	***
>7.5 inches to ≤9.0 inches	Value	***	***	***	***
>9.0 inches	Value	***	***	***	***
All sizes	Value	252,989	403,765	2,214,299	2,871,053
≤7.5 inches	Share down	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down	***	***	***	***
>9.0 inches	Share down	***	***	***	***
All sizes	Share down	***	***	***	***
≤7.5 inches	Share across	***	***	***	***
>7.5 inches to ≤9.0 inches	Share across	***	***	***	***
>9.0 inches	Share across	***	***	***	***
All sizes	Share across	8.8	14.1	77.1	100.0
≤7.5 inches	Share down and across	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down and across	***	***	***	***
>9.0 inches	Share down and across	***	***	***	***
All sizes	Share down and across	***	***	***	100.0

Table continued.

Table E-1 Continued

Paper plates: U.S. producers' U.S. shipments in 2023, by size and product type

Unit value in dollars per 1,000 plates

Size and branding type	Measure	Solid white	Special occasion	Other	All colors
≤7.5 inches	Unit value	***	***	***	***
>7.5 inches to ≤9.0 inches	Unit value	***	***	***	***
>9.0 inches	Unit value	***	***	***	***
All sizes	Unit value	28.44	65.15	63.30	57.34
≤7.5 inches	Difference down	▼***	▼***	▼***	▼***
>7.5 inches to ≤9.0 inches	Difference down	▼***	▼***	▼***	▼***
>9.0 inches	Difference down	▲***	▲***	▲***	▲***
All sizes	Difference down	***	***	***	***
≤7.5 inches	Difference across	▼***	▲***	▲***	***
>7.5 inches to ≤9.0 inches	Difference across	▼***	▲***	▲***	***
>9.0 inches	Difference across	▼***	▲***	▼***	***
All sizes	Difference across	▼***	▲***	▲***	***
≤7.5 inches	Difference down and across	▼***	▼***	▼***	▼***
>7.5 inches to ≤9.0 inches	Difference down and across	▼***	▼***	▼***	▼***
>9.0 inches	Difference down and across	▲***	▲***	▲***	▲***
All sizes	Difference down and across	▼***	▲***	▲***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table E-2**Paper plates: U.S. importers' U.S. shipments of imports from China in 2023, by size and product type**

Quantity in 1,000 units; Shares in percent

Size and branding type	Measure	Solid white	Special occasion	Other	All colors
≤7.5 inches	Quantity	***	***	***	***
>7.5 inches to ≤9.0 inches	Quantity	***	***	***	***
>9.0 inches	Quantity	***	***	***	***
All sizes	Quantity	***	***	***	***
≤7.5 inches	Share down	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down	***	***	***	***
>9.0 inches	Share down	***	***	***	***
All sizes	Share down	100.0	100.0	100.0	100.0
≤7.5 inches	Share across	***	***	***	100.0
>7.5 inches to ≤9.0 inches	Share across	***	***	***	100.0
>9.0 inches	Share across	***	***	***	100.0
All sizes	Share across	***	***	***	100.0
≤7.5 inches	Share down and across	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down and across	***	***	***	***
>9.0 inches	Share down and across	***	***	***	***
All sizes	Share down and across	***	***	***	100.0

Table continued.

Table E-2 Continued

Paper plates: U.S. importers' U.S. shipments of imports from China in 2023, by size and product type

Value in 1,000 dollars; Shares in percent

Size and branding type	Measure	Solid white	Special occasion	Other	All colors
≤7.5 inches	Value	***	***	***	***
>7.5 inches to ≤9.0 inches	Value	***	***	***	***
>9.0 inches	Value	***	***	***	***
All sizes	Value	***	***	***	***
≤7.5 inches	Share down	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down	***	***	***	***
>9.0 inches	Share down	***	***	***	***
All sizes	Share down	100.0	100.0	100.0	100.0
≤7.5 inches	Share across	***	***	***	100.0
>7.5 inches to ≤9.0 inches	Share across	***	***	***	100.0
>9.0 inches	Share across	***	***	***	100.0
All sizes	Share across	***	***	***	100.0
≤7.5 inches	Share down and across	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down and across	***	***	***	***
>9.0 inches	Share down and across	***	***	***	***
All sizes	Share down and across	***	***	***	100.0

Table continued.

Table E-2 Continued

Paper plates: U.S. importers' U.S. shipments of imports from China in 2023, by size and product type

Unit value in dollars per 1,000 plates

Size and branding type	Measure	Solid white	Special occasion	Other	All colors
≤7.5 inches	Unit value	***	***	***	***
>7.5 inches to ≤9.0 inches	Unit value	***	***	***	***
>9.0 inches	Unit value	***	***	***	***
All sizes	Unit value	***	***	***	***
≤7.5 inches	Difference down	▼***	▼***	▼***	▼***
>7.5 inches to ≤9.0 inches	Difference down	▲***	▲***	▼***	▼***
>9.0 inches	Difference down	▲***	▲***	▲***	▲***
All sizes	Difference down	***	***	***	***
≤7.5 inches	Difference across	▼***	▼***	▲***	***
>7.5 inches to ≤9.0 inches	Difference across	▼***	▲***	▼***	***
>9.0 inches	Difference across	▼***	▲***	▼***	***
All sizes	Difference across	▼***	▲***	▼***	***
≤7.5 inches	Difference down and across	▼***	▼***	▼***	▼***
>7.5 inches to ≤9.0 inches	Difference down and across	▼***	▲***	▼***	▼***
>9.0 inches	Difference down and across	▲***	▲***	▲***	▲***
All sizes	Difference down and across	▼***	▲***	▼***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table E-3**Paper plates: U.S. importers' U.S. shipments of imports from Thailand in 2023, by size and product type**

Quantity in 1,000 units; Shares in percent

Size and branding type	Measure	Solid white	Special occasion	Other	All colors
≤7.5 inches	Quantity	***	***	***	***
>7.5 inches to ≤9.0 inches	Quantity	***	***	***	***
>9.0 inches	Quantity	***	***	***	***
All sizes	Quantity	***	***	***	***
≤7.5 inches	Share down	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down	***	***	***	***
>9.0 inches	Share down	***	***	***	***
All sizes	Share down	100.0	100.0	100.0	100.0
≤7.5 inches	Share across	***	***	***	100.0
>7.5 inches to ≤9.0 inches	Share across	***	***	***	100.0
>9.0 inches	Share across	***	***	***	100.0
All sizes	Share across	***	***	***	100.0
≤7.5 inches	Share down and across	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down and across	***	***	***	***
>9.0 inches	Share down and across	***	***	***	***
All sizes	Share down and across	***	***	***	100.0

Table continued.

Table E-3 Continued

Paper plates: U.S. importers' U.S. shipments of imports from Thailand in 2023, by size and product type

Value in 1,000 dollars; Shares in percent

Size and branding type	Measure	Solid white	Special occasion	Other	All colors
≤7.5 inches	Value	***	***	***	***
>7.5 inches to ≤9.0 inches	Value	***	***	***	***
>9.0 inches	Value	***	***	***	***
All sizes	Value	***	***	***	***
≤7.5 inches	Share down	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down	***	***	***	***
>9.0 inches	Share down	***	***	***	***
All sizes	Share down	100.0	100.0	100.0	100.0
≤7.5 inches	Share across	***	***	***	100.0
>7.5 inches to ≤9.0 inches	Share across	***	***	***	100.0
>9.0 inches	Share across	***	***	***	100.0
All sizes	Share across	***	***	***	100.0
≤7.5 inches	Share down and across	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down and across	***	***	***	***
>9.0 inches	Share down and across	***	***	***	***
All sizes	Share down and across	***	***	***	100.0

Table continued.

Table E-3 Continued

Paper plates: U.S. importers' U.S. shipments of imports from Thailand in 2023, by size and product type

Unit value in dollars per 1,000 plates

Size and branding type	Measure	Solid white	Special occasion	Other	All colors
≤7.5 inches	Unit value	***	***	***	***
>7.5 inches to ≤9.0 inches	Unit value	***	***	***	***
>9.0 inches	Unit value	***	***	***	***
All sizes	Unit value	***	***	***	***
≤7.5 inches	Difference down	***	▼***	▼***	▼***
>7.5 inches to ≤9.0 inches	Difference down	***	▼***	▼***	▼***
>9.0 inches	Difference down	***	▲***	▲***	▲***
All sizes	Difference down	***	***	***	***
≤7.5 inches	Difference across	▼***	***	▼***	***
>7.5 inches to ≤9.0 inches	Difference across	▼***	▼***	▲***	***
>9.0 inches	Difference across	▼***	▼***	▲***	***
All sizes	Difference across	▼***	▼***	▲***	***
≤7.5 inches	Difference down and across	▼***	▼***	▼***	▼***
>7.5 inches to ≤9.0 inches	Difference down and across	▼***	▼***	▼***	▼***
>9.0 inches	Difference down and across	▼***	▲***	▲***	▲***
All sizes	Difference down and across	▼***	▼***	▲***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table E-4**Paper plates: U.S. importers' U.S. shipments of imports from Vietnam in 2023, by size and product type**

Quantity in 1,000 units; Shares in percent

Size and branding type	Measure	Solid white	Special occasion	Other	All colors
≤7.5 inches	Quantity	***	***	***	***
>7.5 inches to ≤9.0 inches	Quantity	***	***	***	***
>9.0 inches	Quantity	***	***	***	***
All sizes	Quantity	***	***	***	***
≤7.5 inches	Share down	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down	***	***	***	***
>9.0 inches	Share down	***	***	***	***
All sizes	Share down	100.0	100.0	100.0	100.0
≤7.5 inches	Share across	***	***	***	100.0
>7.5 inches to ≤9.0 inches	Share across	***	***	***	100.0
>9.0 inches	Share across	***	***	***	100.0
All sizes	Share across	***	***	***	100.0
≤7.5 inches	Share down and across	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down and across	***	***	***	***
>9.0 inches	Share down and across	***	***	***	***
All sizes	Share down and across	***	***	***	100.0

Table continued.

Table E-4 Continued

Paper plates: U.S. importers' U.S. shipments of imports from Vietnam in 2023, by size and product type

Value in 1,000 dollars; Shares in percent

Size and branding type	Measure	Solid white	Special occasion	Other	All colors
≤7.5 inches	Value	***	***	***	***
>7.5 inches to ≤9.0 inches	Value	***	***	***	***
>9.0 inches	Value	***	***	***	***
All sizes	Value	***	***	***	***
≤7.5 inches	Share down	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down	***	***	***	***
>9.0 inches	Share down	***	***	***	***
All sizes	Share down	100.0	100.0	100.0	100.0
≤7.5 inches	Share across	***	***	***	100.0
>7.5 inches to ≤9.0 inches	Share across	***	***	***	100.0
>9.0 inches	Share across	***	***	***	100.0
All sizes	Share across	***	***	***	100.0
≤7.5 inches	Share down and across	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down and across	***	***	***	***
>9.0 inches	Share down and across	***	***	***	***
All sizes	Share down and across	***	***	***	100.0

Table continued.

Table E-4 Continued

Paper plates: U.S. importers' U.S. shipments of imports from Vietnam in 2023, by size and product type

Unit value in dollars per 1,000 plates

Size and branding type	Measure	Solid white	Special occasion	Other	All colors
≤7.5 inches	Unit value	***	***	***	***
>7.5 inches to ≤9.0 inches	Unit value	***	***	***	***
>9.0 inches	Unit value	***	***	***	***
All sizes	Unit value	***	***	***	***
≤7.5 inches	Difference down	***	▼***	▼***	▼***
>7.5 inches to ≤9.0 inches	Difference down	***	▲***	▼***	▼***
>9.0 inches	Difference down	***	▲***	▲***	▲***
All sizes	Difference down	***	***	***	***
≤7.5 inches	Difference across	▼***	▲***	▼***	***
>7.5 inches to ≤9.0 inches	Difference across	▼***	▲***	▼***	***
>9.0 inches	Difference across	▼***	▲***	▼***	***
All sizes	Difference across	▼***	▲***	▼***	***
≤7.5 inches	Difference down and across	▼***	▲***	▼***	▼***
>7.5 inches to ≤9.0 inches	Difference down and across	▼***	▲***	▼***	▼***
>9.0 inches	Difference down and across	▼***	▲***	▲***	▲***
All sizes	Difference down and across	▼***	▲***	▼***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table E-5**Paper plates: U.S. importers' U.S. shipments of imports from subject sources in 2023, by size and product type**

Quantity in 1,000 units; Shares in percent

Size and branding type	Measure	Solid white	Special occasion	Other	All colors
≤7.5 inches	Quantity	***	***	***	***
>7.5 inches to ≤9.0 inches	Quantity	***	***	***	***
>9.0 inches	Quantity	***	***	***	***
All sizes	Quantity	***	***	***	***
≤7.5 inches	Share down	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down	***	***	***	***
>9.0 inches	Share down	***	***	***	***
All sizes	Share down	100.0	100.0	100.0	100.0
≤7.5 inches	Share across	***	***	***	100.0
>7.5 inches to ≤9.0 inches	Share across	***	***	***	100.0
>9.0 inches	Share across	***	***	***	100.0
All sizes	Share across	***	***	***	100.0
≤7.5 inches	Share down and across	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down and across	***	***	***	***
>9.0 inches	Share down and across	***	***	***	***
All sizes	Share down and across	***	***	***	100.0

Table continued.

Table E-5 Continued

Paper plates: U.S. importers' U.S. shipments of imports from subject sources in 2023, by size and product type

Value in 1,000 dollars; Shares in percent

Size and branding type	Measure	Solid white	Special occasion	Other	All colors
≤7.5 inches	Value	***	***	***	***
>7.5 inches to ≤9.0 inches	Value	***	***	***	***
>9.0 inches	Value	***	***	***	***
All sizes	Value	***	***	***	***
≤7.5 inches	Share down	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down	***	***	***	***
>9.0 inches	Share down	***	***	***	***
All sizes	Share down	100.0	100.0	100.0	100.0
≤7.5 inches	Share across	***	***	***	100.0
>7.5 inches to ≤9.0 inches	Share across	***	***	***	100.0
>9.0 inches	Share across	***	***	***	100.0
All sizes	Share across	***	***	***	100.0
≤7.5 inches	Share down and across	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down and across	***	***	***	***
>9.0 inches	Share down and across	***	***	***	***
All sizes	Share down and across	***	***	***	100.0

Table continued.

Table E-5 Continued

Paper plates: U.S. importers' U.S. shipments of imports from subject sources in 2023, by size and product type

Unit value in dollars per 1,000 plates

Size and branding type	Measure	Solid white	Special occasion	Other	All colors
≤7.5 inches	Unit value	***	***	***	***
>7.5 inches to ≤9.0 inches	Unit value	***	***	***	***
>9.0 inches	Unit value	***	***	***	***
All sizes	Unit value	***	***	***	***
≤7.5 inches	Difference down	▼***	▼***	▼***	▼***
>7.5 inches to ≤9.0 inches	Difference down	▲***	▼***	▼***	▼***
>9.0 inches	Difference down	▲***	▲***	▲***	▲***
All sizes	Difference down	***	***	***	***
≤7.5 inches	Difference across	▼***	▼***	▲***	***
>7.5 inches to ≤9.0 inches	Difference across	▼***	▲***	▼***	***
>9.0 inches	Difference across	▼***	▲***	▼***	***
All sizes	Difference across	▼***	▲***	▼***	***
≤7.5 inches	Difference down and across	▼***	▼***	▼***	▼***
>7.5 inches to ≤9.0 inches	Difference down and across	▼***	▲***	▼***	▼***
>9.0 inches	Difference down and across	▼***	▲***	▲***	▲***
All sizes	Difference down and across	▼***	▲***	▼***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table E-6**Paper plates: U.S. importers' U.S. shipments of imports from nonsubject sources in 2023, by size and product type**

Quantity in 1,000 units; Shares in percent

Size and branding type	Measure	Solid white	Special occasion	Other	All colors
≤7.5 inches	Quantity	***	***	***	***
>7.5 inches to ≤9.0 inches	Quantity	***	***	***	***
>9.0 inches	Quantity	***	***	***	***
All sizes	Quantity	***	***	***	***
≤7.5 inches	Share down	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down	***	***	***	***
>9.0 inches	Share down	***	***	***	***
All sizes	Share down	100.0	100.0	100.0	100.0
≤7.5 inches	Share across	***	***	***	100.0
>7.5 inches to ≤9.0 inches	Share across	***	***	***	100.0
>9.0 inches	Share across	***	***	***	100.0
All sizes	Share across	***	***	***	100.0
≤7.5 inches	Share down and across	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down and across	***	***	***	***
>9.0 inches	Share down and across	***	***	***	***
All sizes	Share down and across	***	***	***	100.0

Table continued.

Table E-6 Continued

Paper plates: U.S. importers' U.S. shipments of imports from nonsubject sources in 2023, by size and product type

Value in 1,000 dollars; Shares in percent

Size and branding type	Measure	Solid white	Special occasion	Other	All colors
≤7.5 inches	Value	***	***	***	***
>7.5 inches to ≤9.0 inches	Value	***	***	***	***
>9.0 inches	Value	***	***	***	***
All sizes	Value	***	***	***	***
≤7.5 inches	Share down	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down	***	***	***	***
>9.0 inches	Share down	***	***	***	***
All sizes	Share down	100.0	100.0	100.0	100.0
≤7.5 inches	Share across	***	***	***	100.0
>7.5 inches to ≤9.0 inches	Share across	***	***	***	100.0
>9.0 inches	Share across	***	***	***	100.0
All sizes	Share across	***	***	***	100.0
≤7.5 inches	Share down and across	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down and across	***	***	***	***
>9.0 inches	Share down and across	***	***	***	***
All sizes	Share down and across	***	***	***	100.0

Table continued.

Table E-6 Continued

Paper plates: U.S. importers' U.S. shipments of imports from nonsubject sources in 2023, by size and product type

Unit value in dollars per 1,000 plates

Size and branding type	Measure	Solid white	Special occasion	Other	All colors
≤7.5 inches	Unit value	***	***	***	***
>7.5 inches to ≤9.0 inches	Unit value	***	***	***	***
>9.0 inches	Unit value	***	***	***	***
All sizes	Unit value	***	***	***	***
≤7.5 inches	Difference down	***	▼***	▼***	▼***
>7.5 inches to ≤9.0 inches	Difference down	***	▲***	▲***	▲***
>9.0 inches	Difference down	***	▼***	▼***	▼***
All sizes	Difference down	***	***	***	***
≤7.5 inches	Difference across	▼***	▲***	▼***	***
>7.5 inches to ≤9.0 inches	Difference across	▼***	▲***	▼***	***
>9.0 inches	Difference across	▼***	***	▼***	***
All sizes	Difference across	▼***	▲***	▼***	***
≤7.5 inches	Difference down and across	▼***	▼***	▼***	▼***
>7.5 inches to ≤9.0 inches	Difference down and across	▼***	▲***	▼***	▲***
>9.0 inches	Difference down and across	▼***	▼***	▼***	▼***
All sizes	Difference down and across	▼***	▲***	▼***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table E-7**Paper plates: U.S. importers' U.S. shipments of imports from all imports sources in 2023, by size and product type**

Quantity in 1,000 units; Shares in percent

Size and branding type	Measure	Solid white	Special occasion	Other	All colors
≤7.5 inches	Quantity	***	***	***	***
>7.5 inches to ≤9.0 inches	Quantity	***	***	***	***
>9.0 inches	Quantity	***	***	***	***
All sizes	Quantity	***	***	***	***
≤7.5 inches	Share down	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down	***	***	***	***
>9.0 inches	Share down	***	***	***	***
All sizes	Share down	100.0	100.0	100.0	100.0
≤7.5 inches	Share across	***	***	***	100.0
>7.5 inches to ≤9.0 inches	Share across	***	***	***	100.0
>9.0 inches	Share across	***	***	***	100.0
All sizes	Share across	***	***	***	100.0
≤7.5 inches	Share down and across	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down and across	***	***	***	***
>9.0 inches	Share down and across	***	***	***	***
All sizes	Share down and across	***	***	***	100.0

Table continued.

Table E-7 Continued

Paper plates: U.S. importers' U.S. shipments of imports from all imports sources in 2023, by size and product type

Value in 1,000 dollars; Shares in percent

Size and branding type	Measure	Solid white	Special occasion	Other	All colors
≤7.5 inches	Value	***	***	***	***
>7.5 inches to ≤9.0 inches	Value	***	***	***	***
>9.0 inches	Value	***	***	***	***
All sizes	Value	***	***	***	***
≤7.5 inches	Share down	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down	***	***	***	***
>9.0 inches	Share down	***	***	***	***
All sizes	Share down	100.0	100.0	100.0	100.0
≤7.5 inches	Share across	***	***	***	100.0
>7.5 inches to ≤9.0 inches	Share across	***	***	***	100.0
>9.0 inches	Share across	***	***	***	100.0
All sizes	Share across	***	***	***	100.0
≤7.5 inches	Share down and across	***	***	***	***
>7.5 inches to ≤9.0 inches	Share down and across	***	***	***	***
>9.0 inches	Share down and across	***	***	***	***
All sizes	Share down and across	***	***	***	100.0

Table continued.

Table E-7 Continued

Paper plates: U.S. importers' U.S. shipments of imports from all imports sources in 2023, by size and product type

Unit value in dollars per 1,000 plates

Size and branding type	Measure	Solid white	Special occasion	Other	All colors
≤7.5 inches	Unit value	***	***	***	***
>7.5 inches to ≤9.0 inches	Unit value	***	***	***	***
>9.0 inches	Unit value	***	***	***	***
All sizes	Unit value	***	***	***	***
≤7.5 inches	Difference down	▼***	▼***	▼***	▼***
>7.5 inches to ≤9.0 inches	Difference down	▲***	▼***	▼***	▼***
>9.0 inches	Difference down	▲***	▲***	▲***	▲***
All sizes	Difference down	***	***	***	***
≤7.5 inches	Difference across	▼***	▲***	▲***	***
>7.5 inches to ≤9.0 inches	Difference across	▼***	▲***	▼***	***
>9.0 inches	Difference across	▼***	▲***	▼***	***
All sizes	Difference across	▼***	▲***	▼***	***
≤7.5 inches	Difference down and across	▼***	▼***	▼***	▼***
>7.5 inches to ≤9.0 inches	Difference down and across	▼***	▲***	▼***	▼***
>9.0 inches	Difference down and across	▼***	▲***	▲***	▲***
All sizes	Difference down and across	▼***	▲***	▼***	***

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

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure E-1

Paper plates: Average unit values of U.S. shipments in 2023, by source, size, and product type

* * * * *

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

Figure E-2

Paper plates: Quantity of U.S. shipments in 2023, by source, size, and product type

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires

APPENDIX F

U.S. PRODUCERS AND IMPORTERS RANGE OF AUVS

Table F-1

Paper plates: U.S. producers' reported range of average unit values (AUVs), by firm and AUV type

Firm	AUV type	AUV (dollars per 1,000 units)	Narrative description
***	All U.S. shipments	***	***
***	Lowest AUV product	***	***
***	Highest volume product	***	***
***	Highest AUV product	***	***
***	All U.S. shipments	***	***
***	Lowest AUV product	***	***
***	Highest volume product	***	***
***	Highest AUV product	***	***
***	All U.S. shipments	***	***
***	Lowest AUV product	***	***
***	Highest volume product	***	***
***	Highest AUV product	***	***
***	All U.S. shipments	***	***
***	Lowest AUV product	***	***
***	Highest volume product	***	***
***	Highest AUV product	***	***
***	All U.S. shipments	***	***
***	Lowest AUV product	***	***
***	Highest volume product	***	***
***	Highest AUV product	***	***
***	All U.S. shipments	***	***
***	Lowest AUV product	***	***
***	Highest volume product	***	***
***	Highest AUV product	***	***
***	All U.S. shipments	***	***
***	Lowest AUV product	***	***
***	Highest volume product	***	***
***	Highest AUV product	***	***
***	All U.S. shipments	***	***
***	Lowest AUV product	***	***
***	Highest volume product	***	***
***	Highest AUV product	***	***

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

Note: The average unit value for all U.S. shipments reflects the reported 2023 data while responses for lowest AUV, highest volume, and highest AUV product are reported on a 2021-23 basis.

Firm	AUV type	AUV (dollars per 1,000 units)	Narrative description
***	Highest volume product	***	***
***	Highest AUV product	***	***
***	All U.S. shipments	***	***
***	Lowest AUV product	***	***
***	Highest volume product	***	***
***	Highest AUV product	***	***
***	All U.S. shipments	***	***
***	Lowest AUV product	***	***
***	Highest volume product	***	***
***	Highest AUV product	***	***
***	All U.S. shipments	***	***
***	Lowest AUV product	***	***
***	Highest volume product	***	***
***	Highest AUV product	***	***
***	All U.S. shipments	***	***
***	Lowest AUV product	***	***
***	Highest volume product	***	***
***	Highest AUV product	***	***
***	All U.S. shipments	***	***
***	Lowest AUV product	***	***
***	Highest volume product	***	***
***	Highest AUV product	***	***
***	All U.S. shipments	***	***
***	Lowest AUV product	***	***
***	Highest volume product	***	***
***	Highest AUV product	***	***
***	All U.S. shipments	***	***
***	Lowest AUV product	***	***
***	Highest volume product	***	***
***	Highest AUV product	***	***
***	All U.S. shipments	***	***
***	Lowest AUV product	***	***
***	Highest volume product	***	***
***	Highest AUV product	***	***
***	All U.S. shipments	***	***
***	Lowest AUV product	***	***
***	Highest volume product	***	***
***	Highest AUV product	***	***
***	All U.S. shipments	***	***
***	Lowest AUV product	***	***
***	Highest volume product	***	***
***	Highest AUV product	***	***
***	All U.S. shipments	***	***
***	Lowest AUV product	***	***
***	Highest volume product	***	***
***	Highest AUV product	***	***
***	All U.S. shipments	***	***
***	Lowest AUV product	***	***

Firm	AUV type	AUV (dollars per 1,000 units)	Narrative description
***	Highest volume product	***	***
***	Highest AUV product	***	***
***	All U.S. shipments	***	***
***	Lowest AUV product	***	***
***	Highest volume product	***	***
***	Highest AUV product	***	***
***	All U.S. shipments	***	***
***	Lowest AUV product	***	***
***	Highest volume product	***	***
***	Highest AUV product	***	***
***	All U.S. shipments	***	***
***	Lowest AUV product	***	***
***	Highest volume product	***	***
***	Highest AUV product	***	***

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

Note: The average unit value for all U.S. shipments reflects the reported 2023 data while responses for lowest AUV, highest volume, and highest AUV product are reported on a 2021-23 basis.

