

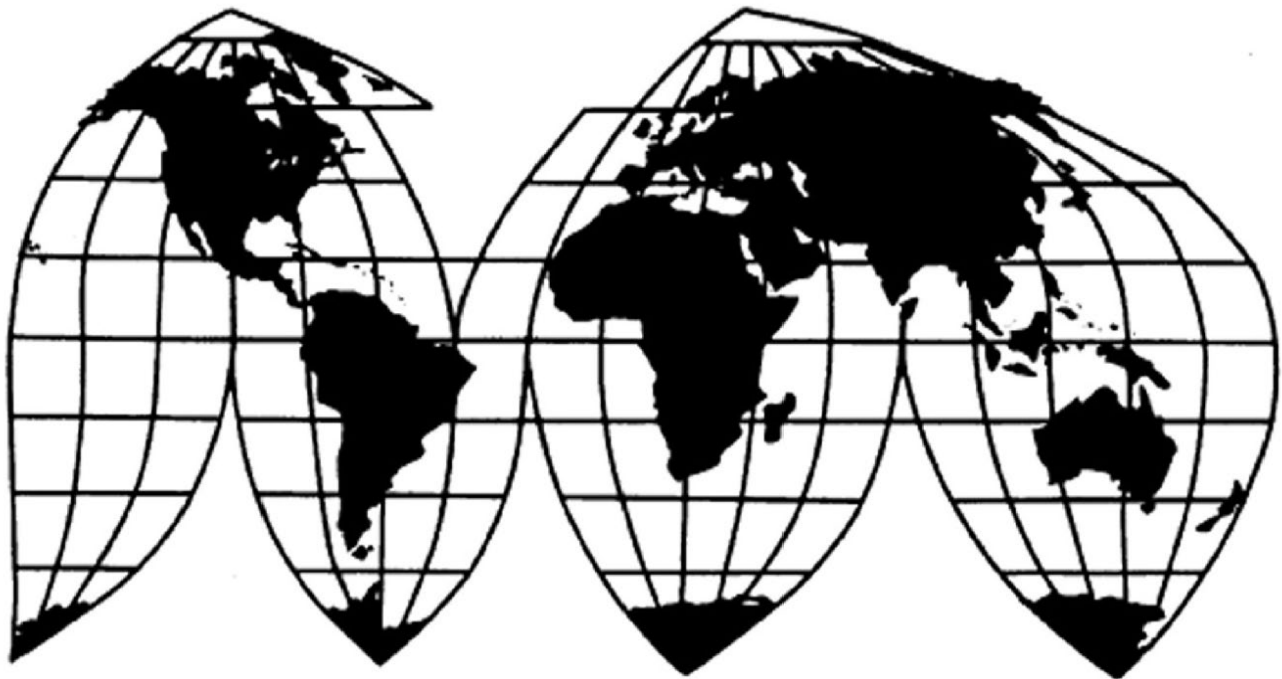
Melamine from India

Investigation Nos. 701-TA-707 and 731-TA-1668 (Final)

Publication 5603

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Note.—Information that would reveal confidential operations of individual firms may not be published.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. Zeroes, null values, and undefined calculations are suppressed and shown as em dashes (—) in tables. If using a screen reader, we recommend increasing the verbosity setting.

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-707 and 731-TA-1668 (Final)

Melamine from India

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 melamine from India, provided for in subheading 2933.61.00 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 subsidized by the government of India.^{2 3}

BACKGROUND

The Commission instituted these investigations effective February 14, 2024, following receipt of petitions filed with the Commission and Commerce by Cornerstone Chemical Company, Waggaman, Louisiana. The Commission scheduled the final phase of the investigations following notification of preliminary determinations by Commerce that imports of melamine are being subsidized by the governments of Germany, India, Qatar, and Trinidad and Tobago within the meaning of section 703(b) of the Act (19 U.S.C. 1671b(b)) and imports of melamine from Germany, India, Japan, Netherlands, Qatar, and Trinidad and Tobago are being sold at LTFV within the meaning of section 733(b) of the Act (19 U.S.C. 1673b(b)). Notice of the scheduling of the final phase of the Commission’s investigations and of a public hearing to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice

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 9413 and 9415, February 12, 2025.

³ The Commission also finds that imports subject to Commerce's affirmative critical circumstances determinations are not likely to undermine seriously the remedial effect of the antidumping and countervailing duty orders on India.

in the *Federal Register* of September 30, 2024 (89 FR 79637). The Commission conducted its hearing on December 3, 2024. All persons who requested the opportunity were permitted to participate.

The investigation schedules became staggered when Commerce postponed the final determination for its antidumping duty investigation regarding India, and aligned the final determination for its countervailing duty investigation regarding India with the corresponding antidumping duty investigation, but did not postpone the final determinations in the remaining antidumping duty and countervailing duty investigations. Following notification of final determinations by Commerce that imports of melamine from India were being subsidized by the government of India within the meaning of section 703(b) of the Act (19 U.S.C. 1671b(b)) and sold at LTFV within the meaning of section 735(a) of the Act (19 U.S.C. 1673d(a)), notice of the supplemental scheduling of the final phase of the Commission's countervailing duty and antidumping duty investigations 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* of February 21, 2025 (90 FR 10083).

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 melamine from India found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value (“LTFV”) and imports of melamine found by Commerce to be subsidized by the government of India. We also find that critical circumstances do not exist with respect to imports of melamine from India that are subject to Commerce’s final affirmative critical circumstances determinations.

I. Background

The antidumping duty petitions for melamine from Germany, India, Japan, the Netherlands, Qatar, and Trinidad and Tobago and the countervailing duty petitions for melamine from Germany, India, Qatar, and Trinidad and Tobago were filed on February 14, 2024, by Cornerstone Chemical Company (“Petitioner”), the only known domestic producer of melamine.¹ The investigation schedules became staggered when the U.S. Department of Commerce (“Commerce”) postponed the final determination for its antidumping duty investigation regarding India, and aligned the final determination for its countervailing duty investigation regarding India with the corresponding antidumping duty investigation, but did not postpone the final determinations in the remaining antidumping and countervailing duty investigations.² This necessitated earlier determinations by the Commission in the final phase

¹ Confidential Staff Report, INV-XX-028 (Mar. 12, 2025) (“Supplemental CR”); *Melamine from India*, Inv. Nos. 701-TA-707 and 731-TA-1668 (Final), USITC Pub. 5603 (Mar. 2025) (“Supplemental PR”) (together, “Supplemental CR/PR”) at 1.1.

² *Melamine from India: Preliminary Affirmative Countervailing Duty Determination, Preliminary Affirmative Critical Circumstances Determination, and Alignment of Final Determination with the Final* (Continued...)

antidumping duty investigations on melamine from Germany, Japan, the Netherlands, and Trinidad and Tobago and the countervailing duty investigations on melamine from Germany, Qatar, and Trinidad and Tobago. The Commission reached affirmative determinations in those investigations on January 7, 2025.³

Subsequent to the Commission's determinations in the leading investigations, Commerce issued final affirmative antidumping and countervailing duty determinations with respect to imports of melamine from India on February 12, 2025.⁴ As a result, the Commission must now make its determinations in the antidumping and countervailing duty investigations of

Antidumping Duty Determination, 89 Fed. Reg. 59055 (July 22, 2024); *Melamine from India: Preliminary Affirmative Determination of Sales at Less Than Fair Value and Affirmative Determination of Critical Circumstances, in Part*, 89 Fed. Reg. 77832 (Sep. 24, 2024); *Melamine from India: Postponement of Final Determination of Sales at Less Than Fair Value Investigation*, 89 Fed. Reg. 84533 (Oct. 23, 2024); *Melamine from Germany: Final Affirmative Determination of Sales at Less Than Fair Value*, 89 Fed. Reg. 97584 (Dec. 9, 2024); *Melamine from Germany: Final Affirmative Countervailing Duty Determination*, 89 Fed. Reg. 97586 (Dec. 9, 2024); *Melamine from the Netherlands: Final Affirmative Determination of Sales at Less Than Fair Value*, 89 Fed. Reg. 97590 (Dec. 9, 2024); *Melamine from Qatar: Final Negative Determination of Sales at Less Than Fair Value and Final Negative Determination of Critical Circumstances*, 89 Fed. Reg. 97592 (Dec. 9, 2024); *Melamine from Qatar: Final Affirmative Countervailing Duty Determination and Final Negative Critical Circumstances Determination*, 89 Fed. Reg. 97593 (Dec. 9, 2024); *Melamine from Qatar; Termination of Investigation*, 89 Fed. Reg. 104206 (Dec. 20, 2024); *Melamine from Trinidad and Tobago: Final Affirmative Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part*, 89 Fed. Reg. 97598 (Dec. 9, 2024); *Melamine from Trinidad and Tobago: Final Affirmative Determination in the Countervailing Duty Investigation*, 89 Fed. Reg. 97599 (Dec. 9, 2024); *Melamine from Japan: Final Affirmative Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances, In Part*, 89 Fed. Reg. 97601 (Dec. 9, 2024).

³ *Melamine from Germany, Japan, Netherlands, Qatar, and Trinidad and Tobago*, 90 Fed. Reg. 8405 (Jan. 29, 2025); *Melamine from Germany, Japan, Netherlands, Qatar, and Trinidad and Tobago*, Inv. Nos. 701-TA-706, 708-709 and 731-TA-1667, 1669-1670, 1672 (Final), USITC Pub. 5577 (Jan. 2025).

⁴ *Melamine from India: Final Affirmative Countervailing Duty Determination and Critical Circumstances Determination*, 90 Fed. Reg. 9413 (Feb. 12, 2025); *Melamine from India: Final Affirmative Determination of Sales at Less Than Fair Value and Affirmative Determination of Critical Circumstances, In Part*, 90 Fed. Reg. 9415 (Feb. 12, 2025).

melamine from India (the “trailing investigations”).⁵ Pursuant to the statutory provision on staggered investigations, 19 U.S.C. § 1677(7)(G)(iii), the record for the trailing investigations closed on December 27, 2024, except that Commerce’s final determinations on subject imports from India and the parties’ final comments concerning those determinations have been added to the record.⁶

Petitioner filed supplemental final comments with respect to antidumping and countervailing duty investigations of melamine from India.⁷ Two respondent parties—Gujarat State Fertilizers and Chemicals Limited (“GSFC”),⁸ an Indian producer of melamine, and BMK

⁵ *Melamine from India: Preliminary Affirmative Countervailing Duty Determination, Preliminary Affirmative Critical Circumstances Determination, and Alignment of Final Determination with the Final Antidumping Duty Determination*, 88 Fed. Reg. 59055 (July 22, 2024); *Melamine from India: Postponement of Final Determination of Sales at Less Than Fair Value Investigation*, 89 Fed. Reg. 84533 (Oct. 23, 2024).

⁶ See 19 U.S.C. § 1677(7)(G)(iii). Consistent with the statute, imports of melamine from India subject to the affirmative determinations in the earlier antidumping and countervailing duty investigations remain eligible for cumulation for purposes of the antidumping duty petitions for melamine from Germany, Japan, the Netherlands, and Trinidad and Tobago and the countervailing duty petitions for melamine from Germany, Qatar, and Trinidad and Tobago. See *Grain-Oriented Electrical Steel from China, Czech Republic, Korea, and Russia*, Inv. Nos. 701-TA-505, 731-TA-1231-32, 1235, and 1237 (Final), USITC Pub. 4500 at 4-5 (Nov. 2014); *Certain Steel Threaded Rod from India*, Inv. Nos. 701-TA-498, 731-TA-1213 (Final), USITC Pub. 4487 at 4-5 (Aug. 2014). The statutory provisions concerning investigations that start out together, but then become staggered, were designed to ensure that cumulation is based on the petition filing date, not the date of the ultimate vote. The statute provides that, in the subsequent investigations, the Commission shall make its determination “based on the record compiled in the first investigation in which it makes a final determination,” with the addition of information and argument on Commerce’s final margins for the later investigations. See 19 U.S.C. § 1677(7)(G)(iii). This provision enables the Commission to continue to cumulate subject imports in the later investigations, using the record (properly modified) compiled in the leading investigation.

⁷ Petitioner’s Supplemental Final Comments, EDIS Doc. 844166 (Confidential) & 844168 (Public) (Feb. 24, 2025).

⁸ BMK America’s Supplemental Final Comments, EDIS Doc. 844279 (Confidential) & 844280 (Public) (Feb. 24, 2025).

Americas LLC (“BMK Americas”),⁹ a U.S. importer of melamine from India during the period of investigation (POI)—also filed supplemental final comments.

II. Negligible Imports

Pursuant to Section 771(24) of the Tariff Act, imports from a subject country of merchandise corresponding to a domestic like product that account for less than 3 percent of all such merchandise imported into the United States during the most recent 12 months for which data are available preceding the filing of the petition shall generally be deemed negligible.¹⁰ In the case of countervailing duty investigations involving developing countries (as designated by the United States Trade Representative (“USTR”)), the statute indicates that the negligibility limits are 4 percent and 9 percent, rather than 3 percent and 7 percent.¹¹

Petitioner and Respondents GSFC and BMK Americas do not address negligibility in their supplemental final comments.

As previously stated, the petitions for the antidumping duty petitions for melamine from Germany, India, Japan, the Netherlands, Qatar, and Trinidad and Tobago and the countervailing duty petitions for melamine from Germany, India, Qatar, and Trinidad and Tobago were all filed on the same day, February 14, 2024. During the 12-month period prior to the filing of the petitions (February 2023 through January 2024), imports of melamine from India subject to the antidumping and countervailing duty investigations accounted for *** percent of total

⁹ GSFC’s Supplemental Final Comments, EDIS Doc. 844213 (Confidential) & 844214 (Public) (Feb. 24, 2025).

¹⁰ 19 U.S.C. § 1677(24)(A)(i).

¹¹ India is not on USTR’s list of developing countries for purposes of applicability of the 4 percent and 9 percent negligibility limits. *See Designations of Developing Countries and Least Developed Countries Under the Countervailing Duty Law*, 85 Fed. Reg. 7613 (USTR Feb. 10, 2020).

imports.¹² Because subject imports from India exceed the 3 percent statutory negligibility threshold, we find that imports of melamine from India subject to the antidumping and countervailing duty investigations are not negligible.

III. Material Injury by Reason of Cumulated Subject Imports

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

¹² Supplemental CR/PR at Table 1.4.

¹³ 19 U.S.C. § 1677(7)(G)(iii).

¹⁴ The statute additionally instructs the Commission to consider the “magnitude of the dumping margin” in an antidumping duty proceeding as part of its consideration of the impact of subject imports. 19 U.S.C. § 1677(7)(C)(iii)(V). In its final antidumping duty determination regarding imports of melamine from India, Commerce found a 632.74 percent dumping margin for GSFC and a 513.28 percent dumping margin for all others. *Melamine from India: Final Affirmative Determination of Sales at Less Than Fair Value and Affirmative Determination of Critical Circumstances, In Part*, 90 Fed. Reg. 9415 (Feb. 12, 2025).

We take into account in our analysis the fact that Commerce has made a final determination that subject imports from India are sold in the United States at LTFV, including the magnitude of the margins of dumping found by Commerce. In addition to this consideration, other factors that support our analysis from the leading determination remain unchanged and do not require modification. For example, our analysis of the significant price effects of cumulated subject imports found in the leading determination is probative to our assessment of the impact of such imports, including subject imports from India. *See Melamine from Germany, Japan, Netherlands, Qatar, and Trinidad and Tobago*, USITC Pub. 5577 at 38-46.

IV. Critical Circumstances

A. Legal Standards

In its final antidumping duty determination for India, Commerce found that critical circumstances exist with respect to imports of melamine from India produced and exported by GSFC.¹⁵ Commerce did not find that critical circumstances exist with respect to imports of melamine produced and exported by any other producers or exporters of melamine from India.¹⁶ In its final countervailing duty determination, Commerce determined that critical circumstances exist with respect to imports of melamine from GSFC and all other producers/exporters of melamine in India.¹⁷ Because we have determined that the domestic industry is materially injured by reason of subject imports from India, we must further determine “whether the imports subject to the affirmative {Commerce critical circumstances} determination ... are likely to undermine seriously the remedial effect of the antidumping {and/or countervailing duty} order{s} to be issued.”¹⁸

The Statement of Administrative Action (“SAA”) to the Uruguay Round Agreements Act (“URAA”) 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

¹⁵ *Melamine from India: Final Affirmative Determination of Sales at Less Than Fair Value and Affirmative Determination of Critical Circumstances, In Part*, 90 Fed. Reg. 9415 (Feb. 12, 2025).

¹⁶ *Melamine from India: Final Affirmative Determination of Sales at Less Than Fair Value and Affirmative Determination of Critical Circumstances, In Part*, 90 Fed. Reg. 9415 (Feb. 12, 2025).

¹⁷ *Melamine from India: Final Affirmative Countervailing Duty Determination and Critical Circumstances Determination*, 90 Fed. Reg. 9413 (Feb. 12, 2025).

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

seriously undermine the remedial effect of the order."¹⁹ The legislative history for the critical circumstances provision indicates that the provision was designed "to deter exporters whose merchandise is subject to an investigation from circumventing the intent of the law by increasing their exports to the United States during the period between initiation of an investigation and a preliminary determination by {Commerce}."²⁰ An affirmative critical circumstances determination by the Commission, in conjunction with an affirmative determination of material injury by reason of subject imports, 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.

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.²¹

In considering the timing and volume of subject imports, the Commission's practice is to consider import quantities prior to the filing of the petition with those subsequent to the filing

¹⁹ SAA at 877.

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

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

of the petition using monthly statistics on the record regarding those firms for which Commerce has made an affirmative critical circumstances determination.²²

B. Party Arguments

Petitioner's Arguments. Petitioner argues that the appropriate comparison period is the five-month pre-petition period of September 2023 to January 2024 and the five-month post-petition period of February 2024 to June 2024.²³ According to petitioner, pricing data support the conclusion that subject imports from India are likely to undermine seriously the remedial effects of the antidumping and countervailing duty orders.²⁴ Further, the petitioner argues that the Commission should “account for the fact that the domestic industry is highly vulnerable to GSFC’s efforts to undermine relief, given {its} severely injured state and its vulnerability to further material injury.”²⁵

Respondents' Arguments. Respondent BMK Americas argues that the timing and volume of imports from India reflect normal seasonal fluctuations; and that, in any event, the post-petition increase in subject imports from India was not massive enough to seriously undermine a potential order because those imports were a small percentage of apparent U.S. consumption.²⁶ It also argues that the inventory trends during the pre- and post-petition periods do not indicate any increase that would undermine the remedial effect of any order

²² See *Lined Paper School Supplies from China, India, and Indonesia*, Inv. Nos. 701-TA-442-443 and 731-TA-1095-1097, USITC Pub. 3884 at 46-48 (Sept. 2006); *Carbazole Violet Pigment from China and India*, Inv. Nos. 701-TA-437 and 731-TA-1060-1061 (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).

²³ Petitioner’s Supplemental Final Comments, EDIS Doc. 844166 at 3-4; Petitioner’s Prehearing Brief, EDIS Doc. 838058 at 60.

²⁴ Petitioner’s Supplemental Final Comments, EDIS Doc. 844166 at 4; Petitioner’s Prehearing Brief, EDIS Doc. 838058 at 60-61.

²⁵ Petitioner’s Supplemental Final Comments, EDIS Doc. 844166 at 4-5.

²⁶ BMK America’s Supplemental Final Comments, EDIS Doc. 844279 at 3-4.

imposed.²⁷ Respondent GSFC argues that the increase in the volume of actual imports was not large enough to undermine seriously the remedial effects of any imposed order.²⁸

C. Analysis

We first consider the appropriate periods for comparison of pre-petition and post-petition levels of subject imports from India. The petitions in these investigations were filed on February 14, 2024.²⁹ The Commission frequently relies on comparisons of the six-month periods preceding and following the filing of the petitions.³⁰ However, the Commission has relied on shorter periods where the timing of the initial preliminary Commerce determination authorizing the imposition of provisional duties could have reduced subject import volume in the sixth month of the post-petition period.³¹ Commerce made its preliminary critical

²⁷ BMK America's Supplemental Final Comments, EDIS Doc. 844279 at 4-5.

²⁸ GSFC's Supplemental Final Comments, EDIS Doc. 844213 at 2-4. *See also* Kronospan Prehearing Brief, EDIS Doc. 838136 at 16-17; S.A.F.E. Chemical Prehearing Brief, EDIS Doc. 838068 at 3-4. Respondent GSFC also alleges that the Commission should "should heavily discount, if not ignore" Commerce's critical circumstances determinations regarding GSFC's imports because they were "based upon {adverse facts available} and not based on actual imports." GSFC's Supplemental Final Comments, EDIS Doc. 844213 at 1, 4; GSFC's Prehearing Brief, EDIS Doc. 838064 at 5-6. Sections 1671d(b)(4)(A)(i) and 1673d(b)(4)(A)(1) call on the Commission to make a determination with respect to critical circumstances in the event that Commerce makes an affirmative critical circumstances determination in the relevant countervailing duty or antidumping determination. The statute does not call on the Commission to weigh the reliability of that determination or permit the Commission to discount or disregard Commerce's findings.

²⁹ Supplemental CR/PR at Table 1.1.

³⁰ *Pentafluoroethane (R-125) from China*, Inv. Nos. 701-TA-662 and 731-TA-1554 (Final), USITC Pub. 5281 at 41 & n.221 (Feb. 2022) (relying on six-month comparison periods where Commerce's preliminary countervailing duty determination was made at the very end of the six-month post-petition period); *Thermal Paper from Germany, Japan, Korea, and Germany*, Inv. Nos. 731-TA-1546-1549 (Final), USITC Pub. 5237 at 55 & n.284 (Nov. 2021) (relying on six-month comparison periods for antidumping duty investigations for both Germany and Korea where Commerce's preliminary determinations were after the six-month post-petition periods).

³¹ *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- (Continued...)

circumstances determination in the countervailing duty investigation of melamine from India on July 22, 2024.³² Petitioner argues for a five-month comparison period because Commerce's preliminary countervailing duty determination falls within the six-month period the Commission normally uses in critical circumstances determinations.³³ Respondents, on the other hand, base their arguments upon a six-month comparison period.³⁴

Considering the timing of Commerce's preliminary affirmative countervailing duty determination, which occurred in the latter third of July, and that of the petition, which was filed in mid-February, we will compare the volume of subject imports six months prior to the filing of the petition (August 2023 through January 2024) with the volume of subject imports in the six months after the filing of the petition (February through July 2024) in our critical circumstances analysis of imports from India subject to these investigations.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 Commerce's preliminary countervailing duty determination occurred during the sixth month after the petition).

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).

³² Supplemental CR/PR at Table 1.1.

³³ Petitioner's Supplemental Final Comments, EDIS Doc. 844166 at 3 fn. 13; Petitioner's Prehearing Brief, EDIS Doc. 838058 at 60.

³⁴ See GSFC's Supplemental Final Comments, EDIS Doc. 844213 at 2-3; GSFC's Prehearing Brief, EDIS Doc. 838064 at 3-5; BMK America's Supplemental Final Comments, EDIS Doc. 844279 at 3-5.

³⁵ If a petition is filed within the first half of a month, it is Commission practice to consider that month in the post-petition period. See, e.g., *Pentafluoroethane (R-125) from China*, Inv. Nos. 701-TA-662 and 731-TA-1554 (Final), USITC Pub. 5281 (Feb. 2022) at 1, 41-42. Therefore, because the petition was filed on February 14, less than halfway through February, February is considered post-petition. See *Melamine from Germany, Japan, the Netherlands, Qatar, and Trinidad and Tobago*, USITC Pub. 5577 at 82 fn. 354.

Commerce's preliminary critical circumstance determinations with respect to the countervailing duty investigation and antidumping duty investigation were rendered on July 22, 2024, and September 24, 2024, respectively. Supplemental CR/PR at Table 1.1; *Melamine from India: Preliminary Affirmative Countervailing Duty Determination, Preliminary Affirmative Critical Circumstances Determination, and* (Continued...)

Subject imports from India subject to Commerce’s affirmative critical circumstances determination in the countervailing duty investigation increased from *** pounds in the pre-petition period to *** pounds in the post-petition period, an increase of *** percent.³⁶ The difference in the volume of subject imports subject to the countervailing duty investigation between the pre-petition and the post-petition periods was *** pounds, which is roughly ***

Alignment of Final Determination with the Final Antidumping Duty Determination, 88 Fed. Reg. 59055 (July 22, 2024); *Melamine from India: Preliminary Affirmative Determination of Sales at Less Than Fair Value and Affirmative Determination of Critical Circumstances, in Part*, 89 Fed. Reg. 77832 (Sep. 24, 2024). Consistent with previous cases, we use the same pre- and post-petition periods for both antidumping and countervailing duty critical circumstances analyses. See *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.

If Commerce’s preliminary determination occurs in the latter part of a month, the Commission has the discretion to include that month in the post-petition period, depending upon the circumstances of the case. See, e.g., *MTD Products, Inc. v. United States*, 2023 Ct. Int’l Trade LEXIS 37, Slip Op. 2023-34 at 5-6 (Ct. Int’l Trade, March 16, 2023) (affirming a five-month November 2019 to March 2020 pre-petition period and an April to August 2020 post-petition period as reasonable where Commerce’s initial preliminary determination was issued on August 24, 2020, at the end of the fifth month after the petitions were filed); *Pentafluoroethane (R-125) from China*, Inv. No. 701-TA-662 and 731-TA-1554 (Final), USITC Pub. 5281 (Feb. 2022) at 41-42 (using a six-month comparison period when the petition was filed on January 12 and Commerce’s preliminary countervailing duty and antidumping duty determinations were filed on June 25, 2021, and August 17, 2021, respectively); *Utility Scale Wind Towers from Canada, Indonesia, Korea, and Vietnam*, Inv. Nos. 701-TA-627-629 and 731-TA-1458-1461 (Final), USITC Pub. 5101 at 49 & n.265 (Aug. 2020) (comparing five-month periods in its critical circumstances analyses involving subject imports from Indonesia and Vietnam where Commerce’s initial preliminary determination occurred in the middle of the sixth month after the petitions were filed); *Carbon and Certain Alloy 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 caused reduction of subject import volume in sixth month).

We note that our ultimate finding would have been the same if we examined five-month comparison periods (February through June 2024 compared to September 2023 through January 2024). The percentage increases in imports subject to the affirmative determinations were less for the five-month post-petition period than the comparable increases in the six-month post-petition period (*** versus *** percent for the countervailing duty determination, and *** versus *** percent for the antidumping determination). Supplemental PR/CR at Tables 1.5 and 1.7. Inventories with respect to both determinations were *** in June 2024 as in July 2024 and were minimal as a percentage of imports. Supplemental PR/CR at Tables 1.6 and 1.8. Our conclusions below with respect to changes in pricing apply equally with respect to five-month comparison periods.

³⁶ Supplemental CR/PR at Table 1.5.

percent of apparent U.S. consumption in interim 2024.³⁷ End-of-period U.S. inventories of the relevant subject imports from India held by U.S. importers were *** pounds at the end of the pre-petition period and *** pounds at the end of the post-petition period, a decrease of *** percent.³⁸ The post-petition volume of U.S. inventories of the relevant subject imports from India was equivalent to roughly *** percent of apparent U.S. consumption in interim 2024, and the volume of U.S. inventories of the relevant subject imports did not increase post-petition.³⁹

Subject imports from India subject to Commerce’s affirmative critical circumstances determination in the antidumping duty investigation increased from *** pounds in the pre-petition period to *** pounds in the post-petition period, an increase of *** percent.⁴⁰ The difference in the volume of subject imports subject to the antidumping duty investigation between the pre-petition and the post-petition periods was *** pounds, which is roughly *** percent of apparent U.S. consumption in interim 2024.⁴¹ End-of-period U.S. inventories of the relevant subject imports from India held by U.S. importers were *** pounds at the end of the pre-petition period and *** pounds at the end of the post-petition period, a decrease of *** percent.⁴² The post-petition volume of U.S. inventories of subject imports from India was

³⁷ Compare Supplemental CR/PR at Table 1.5, with Table C.1 (comparing the increase in post-petition imports (*** pounds) from pre-petition imports (*** pounds) to apparent U.S. consumption in interim 2024 (*** pounds)).

³⁸ Supplemental CR/PR at Table 1.6.

³⁹ Compare Supplemental CR/PR Table 1.6, with Table C.1 (comparing post-petition inventories of imports (*** pounds to apparent U.S. consumption in interim 2024 *** pounds)).

⁴⁰ Supplemental CR/PR at Table 1.7.

⁴¹ Compare Supplemental CR/PR at Table 1.7, with Table C.1 (comparing the increase in post-petition imports (*** pounds) from pre-petition imports (*** pounds) to apparent U.S. consumption in interim 2024 (*** pounds)).

⁴² Supplemental CR/PR at Tables I.6, I.8.

equivalent to roughly *** percent of apparent U.S. consumption in interim 2024, and the volume of U.S. inventories of the relevant subject imports did not increase post-petition.⁴³

We also take into account the fact that the volume of subject imports from India and their market share was substantially lower in interim 2024 compared to interim 2023, where the interim 2024 period (January-June 2024) nearly entirely overlaps the post-petition period.⁴⁴ Subject import volume in interim 2024 was *** percent lower than in interim 2023 despite a higher in apparent consumption of 13.7 percent, and their market share was *** percentage points lower.⁴⁵ Moreover, there was no buildup of subject import inventories that could be used to undermine the remedial effect of the orders, and apparent U.S. consumption was 13.7 percent higher across interim periods, at 65.5 million pounds in interim 2024 compared to 57.6 million pounds in interim 2023.^{46 47}

Thus, the overall timing, volume, and inventory data do not indicate that subject imports from India subject to Commerce's affirmative critical circumstances determinations are likely to undermine seriously the effect of the antidumping or countervailing duty orders.

⁴³ Compare Supplemental CR/PR Table 1.8, with Table C.1 (comparing post-petition inventories of imports (*** pounds) to apparent U.S. consumption in interim 2024 (*** pounds)).

⁴⁴ While Commerce's critical circumstances finding for the countervailing duty investigation covers all producers and exporters from India and its finding for the antidumping duty investigation covers only GSFC, the pre-petition import volume is identical and the post-petition volume is nearly identical for both investigations, indicating that GSFC accounted for nearly all relevant subject imports. Supplemental CR/PR at Tables 1.5, 1.7.

⁴⁵ Confidential Staff Report, INV-WW-155 (Dec. 19, 2024) ("CR"); *Melamine from Germany, Japan, Netherlands, Qatar, and Trinidad and Tobago*, USITC Pub. 5577 ("PR") (together, "CR/PR") at Table IV-2; Supplemental CR/PR at Table C-1.

⁴⁶ CR/PR at Tables 1.6, 1.8, C.1.

⁴⁷ Chair Karpel also observes that, with respect to the timing of imports, the majority of post-petition imports entered after the 90-day retroactive period of imposition of preliminary duties in the event of an affirmative Commission critical circumstances determination, leaving those imports vulnerable to retroactive application of duties.

This conclusion is further supported by the pricing data. During the transition from the pre-petition to post-petition periods, from the first quarter of 2024 to the second quarter of 2024, prices of subject imports from India for pricing product 2 (the only pricing product with data for India in those quarters) increased (by *** percent), rather than decreased.⁴⁸ Furthermore, Cornerstone's prices for pricing product 2 increased from the quarter covered entirely by the pre-petition period (the fourth quarter of 2023) to the quarter covered entirely by the post-petition period (the second quarter of 2024), by *** percent.⁴⁹ ⁵⁰ Thus, the pricing data do not indicate that subject import pricing was seriously undermining the remedial effects of the order.

In addition to the foregoing, we note two arguments made by respondents regarding the timing of the relevant subject imports from India. First, respondent GSFC alleges that disruptions in global supply chains and maritime shipping through the Red Sea in January and February 2024 resulted in artificially high imports in March 2024.⁵¹ These disruptions may have resulted in some shipments scheduled for delivery in January 2024, the last month of the pre-petition period, arriving during the post-petition period. However, the record on this point is

⁴⁸ CR/PR at Table V-7.

⁴⁹ CR/PR at Tables V-6-8.

⁵⁰ Chair Karpel notes that an increase rather than a decrease in subject import prices in the post-petition period would be inconsistent with the expected behavior of subject importers if they were seeking to rapidly sell product so as to beat imposition of cash deposits and undermine the remedial effect of the order. Thus, Chair Karpel considers that the pricing data do not indicate that the imports subject to Commerce's critical circumstances determination are likely to undermine seriously the remedial effects of the order.

⁵¹ GSFC's Supplemental Final Comments, EDIS Doc. 844213 at 3; GSFC's Prehearing Brief, EDIS Doc. 838064 at 4. *See also* Qatar Melamine Company Prehearing Brief, EDIS Doc. 838121 at 9 (alleging that disruptions in shipping through the Red Sea contributed to supply disruptions later in the POI); S.A.F.E. Chemical Prehearing Brief, EDIS Doc. 838068 at 3-4 (alleging that the War in Gaza caused supply disruptions); Hearing Transcript at 151; Cornerstone Posthearing Brief, EDIS Doc. 838945 at 72.

not well developed and therefore the extent or magnitude of the disruption's impact is unknown.⁵² Second, respondent BMK Americas alleges that, in light of seasonal variations in demand for melamine, the increase in subject imports from India during the post-petition period were not massive enough to seriously undermine a potential order.⁵³ As discussed in the leading investigation, U.S. melamine sales generally experience some seasonality tied to housing construction, with upticks in demand occurring during the warmer months—*i.e.*, the second and third quarters—of a given year.⁵⁴ This could explain some of the increase in imports during the post-petition period. However, the record on this point is also not well developed and therefore the extent or magnitude of any such seasonality is unknown.

In light of the foregoing considerations, particularly the volume and timing of subject imports in the context of apparent U.S. consumption, importer inventories, and subject import price trends, we find that subject imports from India subject to Commerce's affirmative determinations of critical circumstances are not likely to undermine seriously the remedial effects of the antidumping or countervailing duty orders. Consequently, we make negative critical circumstances findings with respect to subject imports from India subject to Commerce's affirmative determinations of critical circumstances.

⁵² See Qatar Melamine Company Prehearing Brief, EDIS Doc. 838121 at 9 (alleging that disruptions in shipping through the Red Sea contributed to supply disruptions later in the POI); S.A.F.E. Chemical Prehearing Brief, EDIS Doc. 838068 at 3-4 (alleging that the War in Gaza caused supply disruptions); Hearing Transcript at 151.

⁵³ BMK America's Supplemental Final Comments, EDIS Doc. 844279 at 3

⁵⁴ *Melamine from Germany, India, Japan, the Netherlands, Qatar, and Trinidad and Tobago*, USITC Pub. 5577 at 29, 82 fn. 355, 84 fn. 363.

V. Conclusion

For the reasons stated above, we determine that an industry in the United States is materially injured by reason of subject imports of melamine from India found by Commerce to be sold in the United States at LTFV and subsidized by the government of India. We also find that critical circumstances do not exist with respect to imports of melamine from India that are subject to Commerce's final affirmative critical circumstances determinations.

Part 1: Introduction

Background

These investigations result from petitions filed with the U.S. Department of Commerce (“Commerce”) and the U.S. International Trade Commission (“USITC” or “Commission”) by Cornerstone Chemical Company (“Cornerstone”), Waggaman, Louisiana, on February 14, 2024, alleging that an industry in the United States is materially injured and threatened with material injury by reason of subsidized imports of melamine¹ from Germany, India, Qatar, and Trinidad and Tobago and less-than-fair-value (“LTFV”) imports of melamine from Germany, India, Japan, the Netherlands, Qatar, and Trinidad and Tobago. Table 1.1 presents information relating to the background of these investigations.^{2 3}

¹ For a complete description of the merchandise subject to this proceeding, see the section entitled “The Subject Merchandise” in Part 1 of Melamine from Germany, Japan, Netherlands, Qatar, and Trinidad and Tobago (Final), USITC Publication 5577, January 2025.

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 a list of witnesses who appeared at the Commission’s hearing.

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

Effective date	Action
February 14, 2024	Petitions filed with Commerce and the Commission; institution of the Commission investigations (89 FR 13090, February 21, 2024)
March 5, 2024	Commerce's notice of initiation of countervailing duty (CVD) and antidumping duty (AD) investigations (89 FR 17381 and 17413, March 11, 2024)
July 22, 2024	Commerce's preliminary CVD determinations and alignment of final CVD determinations with final AD determinations (89 FR 59045, 59053, 59055, and 59057, July 22, 2024)
September 24, 2024	Commerce's preliminary AD determinations (89 FR 77814, 77819, 77822, 77824, 77829, and 77832, September 24, 2024); scheduling of final phase of Commission investigations (89 FR 79637, September 30, 2024)
October 23, 2024	Commerce's postponement of final CVD and AD determination regarding imports from India (89 FR 84533, October 23, 2024)
December 3, 2024	Commission's hearing
December 9, 2024	Commerce's final CVD and AD determinations, except India (89 FR 97584, 97586, 97590, 97592, 97593, 97598, 97599, and 97601, December 9, 2024)
December 9, 2024	Commission's termination of Qatar AD investigation following Commerce's negative final determination (89 FR 104206, December 20, 2024)
January 7, 2025	Commission's vote, except India
January 23, 2025	Commission's views, except India
January 31, 2025	Commerce's CVD and AD orders, except India (90 FR 8698 and 8701, January 31, 2025)
February 12, 2025	Commerce's final CVD and AD determinations regarding imports from India (90 FR 9413 and 9415, February 12, 2025); scheduling of final phase of Commission's investigations regarding imports from India (90 FR 10083, February 21, 2025)
March 19, 2025	Commission's vote (India)
March 31, 2025	Commission's views (India)

The information contained in this report is intended to be used in conjunction with data presented in Melamine from Germany, Japan, Netherlands, Qatar, and Trinidad and Tobago (Final), USITC Publication 5577, January 2025 and its corresponding confidential report contained in memorandum INV-WW-155, December 19, 2024, as revised by memorandum INV-WW-157, December 30, 2024.⁴ No new information except for Commerce’s final affirmative CVD and LTFV determinations concerning melamine from India, and party comments thereon is included in the record for this proceeding.⁵

Nature and extent of subsidies and sales at LTFV

Subsidies

On February 12, 2025, Commerce published a notice in the Federal Register of its final determination of countervailable subsidies for producers and exporters of melamine from India.⁶ Table 1.2 presents Commerce’s finding of subsidization of melamine in India.

Table 1.2 Melamine: Commerce’s final subsidy determination with respect to imports from India

Entity	Final countervailable subsidy rate (percent)
Gujarat State Fertilizers and Chemicals Limited	276.06
All others	276.06

Source: 90 FR 9413, February 12, 2025.

Note: The subsidy rates are based on adverse facts available.

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

⁵ Comments consistent with the statutory limitation for subsequently completed investigations were filed on behalf of Cornerstone Chemical Company, BMK Americas LLC, and Gujarat State Fertilizers and Chemicals Limited.

⁶ 90 FR 9413, February 12, 2025.

Sales at LTFV

On February 12, 2025, Commerce published a notice in the Federal Register of its final determination of sales at LTFV with respect to imports from India.⁷ Table 1.3 presents Commerce's dumping margins with respect to imports of melamine from India.

Table 1.3 Melamine: Commerce's final weighted-average LTFV margins with respect to imports from India

Exporter/Producer	Final dumping margin (percent)
Gujarat State Fertilizers and Chemicals Limited	632.74
All others	513.28

Source: 90 FR 9415, February 12, 2025.

Note: The dumping margin for Gujarat State Fertilizers and Chemicals Limited is based on adverse facts available.

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.⁸ 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.⁹ Imports from India accounted for *** percent of total imports of melamine by quantity during February 2023 through January 2024 (table 1.4).

⁷ 90 FR 9415, February 12, 2025.

⁸ 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)).

⁹ Section 771 (24) of the Act (19 U.S.C § 1677(24)).

Table 1.4 Melamine: U.S. imports in the twelve-month period preceding the filing of the petitions, February 2023 through January 2024

Quantity in 1,000 pounds; share in percent

Source of imports	Quantity	Share of quantity
Germany	***	***
India	***	***
Japan	1,517	***
Netherlands	15,699	***
Qatar	***	***
Trinidad and Tobago	8,378	***
Subject sources	***	***
Subject sources less Trinidad and Tobago	***	***
Nonsubject sources	***	***
All sources less Trinidad and Tobago	***	***
All import sources	***	***

Source: Compiled from official U.S. import statistics of the U.S. Department of Commerce Census Bureau using statistical reporting number 2933.61.0000, accessed October 10, 2024 and adjusted to remove out of scope merchandise *** under the same HTS statistical reporting number and reclassify *** using proprietary, Census-edited Customs records accessed September 26, 2024.

Note: These calculations are based on Commerce’s final CVD and AD determinations from Germany, India, Japan, the Netherlands, Qatar, and Trinidad and Tobago (89 FR 97584, 97586, 97590, 97592, 97593, 97598, 97599, and 97601, December 9, 2024) and CVD and AD determinations for melamine from India (90 FR 9413 and 9415, February 12, 2025) and are unchanged from the calculations in the leading investigations.

Note: Share of quantity is the share of total imports by quantity.

Critical circumstances

On February 12, 2025, Commerce issued its final critical circumstances determinations in its CVD and AD investigations with regard to certain melamine imports from India. In the CVD investigation, Commerce determined that critical circumstances exist with respect to imports of melamine from Gujarat State Fertilizers and Chemicals Limited and all other exporters or producers. In the AD investigation, Commerce determined that critical circumstances exist with respect to imports of melamine from Gujarat State Fertilizers and Chemicals Limited, but do not

exist with respect to all other exporters or producers.¹⁰ In these investigations, if both Commerce and the Commission make affirmative final critical circumstances determinations, certain subject imports may be subject to antidumping duties retroactive by 90 days from the effective date of Commerce’s affirmative preliminary CVD and AD determinations, or July 22, 2024 and September 24, 2024, respectively. Tables 1.5 through 1.8 and figures 1.2 and 1.3 present these data.

Table 1.5 Melamine: U.S. imports from India subject to Commerce’s affirmative final critical circumstances determination in the CVD investigation, by month

Quantity in 1,000 pounds

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.

¹⁰ 90 FR 9413 and 9415, February 12, 2025, referenced in app. A. When petitioners file timely allegations of critical circumstances, Commerce examines whether there is a reasonable basis to believe or suspect that (1) either there is a history of dumping 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 1.5 (Continued) Melamine: U.S. imports from India subject to Commerce’s affirmative final critical circumstances determination in the CVD investigation, by month

Quantity in 1,000 pounds; 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 proprietary, Census-edited Customs records using HTS statistical reporting number 2933.61.0000, accessed on September 26, 2024. Imports are based on the imports for consumption data series.

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 "---".

Note: The Commerce affirmative final CVD critical circumstances determination applies to all producers from India, including Gujarat State Fertilizers and Chemicals Limited.

Figure 1.1 Melamine: U.S. imports from India subject to Commerce’s affirmative final critical circumstances determination in the CVD investigation, by month

* * * * *

Source: Compiled from proprietary, Census-edited Customs records using HTS statistical reporting number 2933.61.0000, accessed on September 26, 2024. Imports are based on the imports for consumption data series.

Note: The Commerce affirmative final CVD critical circumstances determination applies to all producers from India, including Gujarat State Fertilizers and Chemicals Limited.

Table 1.6 Melamine: U.S. importers' U.S. inventories of imports from India subject to Commerce’s affirmative final critical circumstances determination in the CVD investigation, by date

Quantity in 1,000 pounds; index in percent

Inventories on or around	Quantity	Index
January 31, 2024	***	***
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: Index based on end-of-period inventories on January 31, 2024, equal to 100.0 percent.

Note: The Commerce affirmative final CVD critical circumstances determination applies to all producers from India, including Gujarat State Fertilizers and Chemicals Limited.

Table 1.7 Melamine: U.S. imports from India subject to Commerce’s affirmative final critical circumstances determination in the AD investigation, by month

Quantity in 1,000 pounds

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 1.7 (Continued) Melamine: U.S. imports from India subject to Commerce’s affirmative final critical circumstances determination in the AD investigation, by month

Quantity in 1,000 pounds; 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 proprietary, Census-edited Customs records using HTS statistical reporting number 2933.61.0000, accessed on September 26, 2024. Imports are based on the imports for consumption data series.

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 "---".

Note: The Commerce affirmative final AD critical circumstances determination applies to Indian producer Gujarat State Fertilizers and Chemicals Limited.

Figure 1.2 Melamine: U.S. imports from India subject to Commerce’s affirmative final critical circumstances determination in the AD investigation, by month

* * * * *

Source: Compiled from proprietary, Census-edited Customs records using HTS statistical reporting number 2933.61.0000, accessed on September 26, 2024. Imports are based on the imports for consumption data series.

Note: The Commerce affirmative final AD critical circumstances determination applies to Indian producer Gujarat State Fertilizers and Chemicals Limited.

Table 1.8 Melamine: U.S. importers’ U.S. inventories of imports from India subject to Commerce’s affirmative final critical circumstances determination in the AD investigation, by month

Quantity in 1,000 pounds; index in percent

Inventories on or around	Quantity	Index
January 31, 2024	***	***
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: Index based on end-of-period inventories on January 31, 2024, equal to 100.0 percent.

Note: The Commerce affirmative final AD critical circumstances determination applies to Indian producer Gujarat State Fertilizers and Chemicals Limited.

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 13090, February 21, 2024	Melamine From Germany, India, Japan, Netherlands, Qatar, and Trinidad and Tobago; Institution of Antidumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations	https://www.govinfo.gov/content/pkg/FR-2024-02-21/pdf/2024-03497.pdf
89 FR 17381, March 11, 2024	Melamine From Germany, India, Qatar, and Trinidad and Tobago: Initiation of Countervailing Duty Investigations	https://www.govinfo.gov/content/pkg/FR-2024-03-11/pdf/2024-05126.pdf
89 FR 17413, March 11, 2024	Melamine From Germany, India, Japan, the Netherlands, Qatar, and Trinidad and Tobago: Initiation of Less-Than-Fair-Value Investigations	https://www.govinfo.gov/content/pkg/FR-2024-03-11/pdf/2024-05127.pdf
89 FR 59045, July 22, 2024	Melamine From Qatar: Preliminary Affirmative Countervailing Duty Determination, Preliminary Negative Determination of Critical Circumstances, and Alignment of Final Determination With Final Antidumping Duty Determination	https://www.govinfo.gov/content/pkg/FR-2024-07-22/pdf/2024-15978.pdf
89 FR 59053, July 22, 2024	Melamine From Germany: Preliminary Affirmative Countervailing Duty Determination, and Alignment of Final Determination With Final Antidumping Duty Determination	https://www.govinfo.gov/content/pkg/FR-2024-07-22/pdf/2024-15980.pdf
89 FR 59055, July 22, 2024	Melamine From India: Preliminary Affirmative Countervailing Duty Determination, Preliminary Affirmative Critical Circumstances Determination, and Alignment of Final Determination With the Final Antidumping Duty Determination	https://www.govinfo.gov/content/pkg/FR-2024-07-22/pdf/2024-15981.pdf
89 FR 59057, July 22, 2024	Melamine From Trinidad and Tobago: Preliminary Affirmative Countervailing Duty Determination, and Alignment of Final Determination With Final Antidumping Duty Determination	https://www.govinfo.gov/content/pkg/FR-2024-07-22/pdf/2024-15979.pdf
89 FR 77814, September 24, 2024	Melamine From Trinidad and Tobago: Preliminary Affirmative Determination of Sales at Less Than Fair Value and Affirmative Determination of Critical Circumstances, In Part	https://www.govinfo.gov/content/pkg/FR-2024-09-24/pdf/2024-21829.pdf
89 FR 77819, September 24, 2024	Melamine From Japan: Preliminary Affirmative Determination of Sales at Less Than Fair Value and Affirmative Determination of Critical Circumstances, In Part	https://www.govinfo.gov/content/pkg/FR-2024-09-24/pdf/2024-21826.pdf
89 FR 77822, September 24, 2024	Melamine From Germany: Preliminary Affirmative Determination of Sales at Less Than Fair Value	https://www.govinfo.gov/content/pkg/FR-2024-09-24/pdf/2024-21825.pdf

Citation	Title	Link
89 FR 77824, September 24, 2024	Melamine From Qatar: Preliminary Negative Determination of Sales at Less Than Fair Value	https://www.govinfo.gov/content/pkg/FR-2024-09-24/pdf/2024-21828.pdf
89 FR 77829, September 24, 2024	Melamine From the Netherlands: Preliminary Affirmative Determination of Sales at Less Than Fair Value	https://www.govinfo.gov/content/pkg/FR-2024-09-24/pdf/2024-21827.pdf
89 FR 77832, September 24, 2024	Melamine From India: Preliminary Affirmative Determination of Sales at Less Than Fair Value and Affirmative Determination of Critical Circumstances, in Part	https://www.govinfo.gov/content/pkg/FR-2024-09-24/pdf/2024-21824.pdf
89 FR 79637, September 30, 2024	Melamine From Germany, India, Japan, Netherlands, Qatar, and Trinidad and Tobago; Scheduling of the Final Phase of Countervailing Duty and Antidumping Duty Investigations	https://www.govinfo.gov/content/pkg/FR-2024-09-30/pdf/2024-22252.pdf
89 FR 84533, October 23, 2024	Melamine From India: Postponement of Final Determination of Sales at Less Than Fair Value Investigation	https://www.govinfo.gov/content/pkg/FR-2024-10-23/pdf/2024-24499.pdf
89 FR 97584, December 9, 2024	Melamine From Germany: Final Affirmative Determination of Sales at Less Than Fair Value	https://www.govinfo.gov/content/pkg/FR-2024-12-09/pdf/2024-28800.pdf
89 FR 97586, December 9, 2024	Melamine From Germany: Final Affirmative Countervailing Duty Determination	https://www.govinfo.gov/content/pkg/FR-2024-12-09/pdf/2024-28801.pdf
89 FR 97590, December 9, 2024	Melamine From the Netherlands: Final Affirmative Determination of Sales at Less Than Fair Value	https://www.govinfo.gov/content/pkg/FR-2024-12-09/pdf/2024-28795.pdf
89 FR 97592, December 9, 2024	Melamine From Qatar: Final Negative Determination of Sales at Less Than Fair Value and Final Negative Determination of Critical Circumstances	https://www.govinfo.gov/content/pkg/FR-2024-12-09/pdf/2024-28796.pdf
89 FR 97593, December 9, 2024	Melamine From Qatar: Final Affirmative Countervailing Duty Determination and Final Negative Critical Circumstances Determination	https://www.govinfo.gov/content/pkg/FR-2024-12-09/pdf/2024-28797.pdf
89 FR 97598, December 9, 2024	Melamine From Trinidad and Tobago: Final Affirmative Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances, in Part	https://www.govinfo.gov/content/pkg/FR-2024-12-09/pdf/2024-28799.pdf
89 FR 97599, December 9, 2024	Melamine From Trinidad and Tobago: Final Affirmative Determination in the Countervailing Duty Investigation	https://www.govinfo.gov/content/pkg/FR-2024-12-09/pdf/2024-28798.pdf
89 FR 97601, December 9, 2024	Melamine From Japan: Final Affirmative Determination of Sales at Less Than Fair Value and Final Affirmative Determination of Critical Circumstances, In Part	https://www.govinfo.gov/content/pkg/FR-2024-12-09/pdf/2024-28794.pdf
89 FR 104206, December 20, 2024	Melamine From Qatar; Termination of Investigation	https://www.govinfo.gov/content/pkg/FR-2024-12-20/pdf/2024-30445.pdf

Citation	Title	Link
90 FR 8698, January 31, 2025	Melamine From Germany, Qatar, and Trinidad and Tobago: Countervailing Duty Orders	https://www.govinfo.gov/conten/pkg/FR-2025-01-31/pdf/2025-02001.pdf
90 FR 8701, January 31, 2025	Melamine From Germany, Japan, the Netherlands, and Trinidad and Tobago: Antidumping Duty Orders	https://www.govinfo.gov/conten/pkg/FR-2025-01-31/pdf/2025-01999.pdf
90 FR 9413, February 12, 2025	Melamine From India: Final Affirmative Countervailing Duty Determination and Critical Circumstances Determination	https://www.govinfo.gov/conten/pkg/FR-2025-02-12/pdf/2025-02548.pdf
90 FR 9415, February 12, 2025	Melamine From India: Final Affirmative Determination of Sales at Less Than Fair Value and Affirmative Determination of Critical Circumstances, In Part	https://www.govinfo.gov/conten/pkg/FR-2025-02-12/pdf/2025-02547.pdf
90 FR 10083, February 21, 2025	Melamine From India; Supplemental Schedule for the Final Phase of Countervailing Duty and Antidumping Duty Investigations	https://www.govinfo.gov/conten/pkg/FR-2025-02-21/pdf/2025-02884.pdf

APPENDIX B

LIST OF HEARING WITNESSES

CALENDAR OF PUBLIC HEARING

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

Subject: Melamine from Germany, India, Japan, Netherlands, Qatar, and
Trinidad and Tobago

Inv. Nos.: 701-TA-706-709 and 731-TA-1667-1672 (Final)

Date and Time: December 3, 2024 - 9:30 a.m.

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

OPENING REMARKS:

In Support of Imposition (**Stephen J. Orava**, King & Spalding LLP)
In Opposition to Imposition (**Jeremy W. Dutra**, Squire Patton Boggs (US) LLP)

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

King & Spalding LLP
Washington, DC
on behalf of

Cornerstone Chemical Company

Matthew Sokol, Chief Executive Officer, Cornerstone Chemical Company

Thomas Blaser, Chief Financial Officer, Cornerstone Chemical Company

Michael Driscoll, Global Business Manager of Melamine,
Cornerstone Chemical Company

Roland Frank, Vice President and General Manager of Operations,
Cornerstone Chemical Company

Andrew Szamosszegi, Principal, Capital Trade, Incorporated

Stephen J. Orava)
Stephen Vaughn)
) – OF COUNSEL
Patrick McLain)
Kanzanira Thorington)

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

Squire Patton Boggs (US) LLP
Washington, DC
on behalf of

Hexion Inc.

Chelsea Miller, Senior Community Manager, Hexion, Inc.

Steven Sauter, North American Business Director, Hexion, Inc.

Jeremy W. Dutra) – OF COUNSEL

White & Case LLP
Washington, DC
on behalf of

Qatar Melamine Company (“QMC”)

Craig Brook, Associate General Counsel (Corporate Governance and Compliance),
QatarEnergy

Jay Campbell)
) – OF COUNSEL
Ron Kendler)

Morris, Manning & Martin LLP
Washington, DC
on behalf of

OCI Nitrogen B.V. (“OCI Nitrogen”)

Michèl Heutz, Business Manager, OCI Nitrogen

Emma K. Peterson, Director of International Trade Analytics, Morris,
Manning & Martin, LLP

Brady W. Mills) – OF COUNSEL

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

Fox Rothschild LLP
Washington, DC
on behalf of

Wilsonart LLC

Michael Pierce, Global Community Manager, Wilsonart LLC

Lizabeth R. Levinson)
) – OF COUNSEL
Alexander D. Keyser)

Steptoe LLP
Washington, DC
on behalf of

Helm U.S. Corporation
Methanol Holdings (Trinidad) Ltd.

Christian Wulf, Senior Product Manager, Helm U.S. Corporation

Hanna Sukhu-Maharaj, Director of Marketing and Logistics,
Methanol Holdings (Trinidad) Ltd.

Cara Groden, Senior Economic Consultant, ION Economics, LLC

Eric C. Emerson)
Zhu (Judy) Wang) – OF COUNSEL
Mert E. Arkan)

Mayer Brown LLP
Washington, DC
on behalf of

Allnex USA Inc. (“Allnex”)

Philip N. Wilson, Global Sourcing Manager, Allnex

Sydney H. Mintzer) – OF COUNSEL

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

Craven Trade Law LLC
Chicago, IL
on behalf of

S.A.F.E. Chemicals (“S.A.F.E.”)
Gujarat State Fertilizers and Chemicals Limited (“GSFC”)

David J. Craven) – OF COUNSEL

Covington & Burling LLP
Washington, DC
on behalf of

Kronospan USA LLC (“Kronospan”)

Hans Obermaier, Chief Executive Officer, Kronospan

James M. Smith) – OF COUNSEL

Non-Party in Opposition

Squire Patton Boggs (US) LLP
Washington, DC
on behalf of

Prefere Melamine LLC
Egger Wood Products, LLC

Emily Nuber, Vice President Procurement, Prefere Melamine LLC

Raymond Carillon, Jr., Operations Manager, Pefere Melamine LLC

Stefan Wagner, Corporate Chemical Procurement Manager, Egger Group

Jonathan Stephens, Chief Financial Officer, Plant Manager/Finance
Administration, Egger Group

Jeremy W. Dutra) – OF COUNSEL

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

Alston & Bird
Washington, DC
on behalf of

Unilin North America, LLC (“Unilin”)

Marc Monoson, Strategic Purchasing Director, Laminate & Hardwood, Unilin

Lian Yang)
) – OF COUNSEL
Robert Hawes)

White & Case LLP
Washington, DC
on behalf of

ZYP Coatings Inc.

Justin Holcombe, Vice President and General Manager, ZYP Coatings Inc.

Jay Campbell)
) – OF COUNSEL
Ron Kendler)

Morris, Manning & Martin LLP
Washington, DC
on behalf of

LRBG Chemicals (USA) Inc.

James Bennett, President and Chief executive Officer, LRBG
Chemicals (USA) Inc.

Brady W. Mills) – OF COUNSEL

REBUTTAL/CLOSING REMARKS:

In Support of Imposition (**Stephen Vaughn**, King & Spalding LLP)
In Opposition to Imposition (**Jay Campbell and Ron Kendler**, White & Case LLP *and*
Zhu (Judy) Wang, Steptoe LLP)

APPENDIX C
SUMMARY DATA

Table C.1

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

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

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.....	142,227	142,831	115,756	57,612	65,532	▼(18.6)	▲0.4	▼(19.0)	▲13.7
Producers' share (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Importers' share (fn1):									
Germany.....	***	***	***	***	***	▲***	▲***	▼***	▲***
India.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Japan.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Netherlands.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Qatar.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Trinidad and Tobago (TT).....	***	***	***	***	***	▲***	▲***	▼***	▼***
Subject sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Subject sources less TT.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▼***	▼***	▼***	***
All import sources less TT.....	***	***	***	***	***	▲***	▲***	▲***	▼***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
U.S. consumption value:									
Amount.....	144,046	271,156	129,673	83,441	53,857	▼(10.0)	▲88.2	▼(52.2)	▼(35.5)
Producers' share (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Importers' share (fn1):									
Germany.....	***	***	***	***	***	▲***	▲***	▼***	▲***
India.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Japan.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Netherlands.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Qatar.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Trinidad and Tobago (TT).....	***	***	***	***	***	▼***	▲***	▼***	▼***
Subject sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Subject sources less TT.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▼***	▼***	▼***	***
All import sources less TT.....	***	***	***	***	***	▲***	▲***	▲***	▼***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***

Table continued.

Table C.1 (Continued)

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

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

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. importers' U.S. shipments of imports from:									
Germany:									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
India:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Japan:									
Quantity.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Netherlands:									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Qatar:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	***	▲***	***
Trinidad and Tobago:									
Quantity.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Subject sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Subject sources less Trinidad and Tobago:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Nonsubject sources:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	***
Value.....	***	***	***	***	***	▼***	▲***	▼***	***
Unit value.....	***	***	***	***	***	▼***	▲***	▼***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
All import sources less Trinidad and Tobago:									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
All import sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▼***	▲***	▼***	▼***

Table continued.

Table C.1 (Continued)

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

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

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.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Production quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Capacity utilization (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
U.S. shipments:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Export shipments:									
Quantity.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Inventories/total shipments (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Production workers.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Hours worked (1,000s).....	***	***	***	***	***	▲***	▲***	▼***	▼***
Wages paid (\$1,000).....	***	***	***	***	***	▲***	▲***	▼***	▼***
Hourly wages (dollars per hour).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Productivity (pounds per hour).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit labor costs.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Net sales:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Cost of goods sold (COGS).....	***	***	***	***	***	▼***	▲***	▼***	▲***
Gross profit or (loss) (fn2).....	***	***	***	***	***	▲***	▲***	▲***	▲***
SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▲***	▼***	▼***
Net income or (loss) (fn2).....	***	***	***	***	***	▼***	▲***	▼***	▲***
Unit COGS.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▲***	▼***	▲***
Unit net income or (loss) (fn2).....	***	***	***	***	***	▼***	▲***	▼***	▲***
COGS/sales (fn1).....	***	***	***	***	***	▲***	▼***	▲***	▼***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▲***	▼***	▲***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▲***	▼***	▲***
Capital expenditures.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Research and development expenses.....	***	***	***	***	***	▲***	▲***	▼***	***
Total assets.....	***	***	***	***	***	▼***	▼***	▼***	***

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

